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December 28th, 2017

Alaska Board of Fisheries
John Jensen, Chair
Via email dfg.bof.comments@alaska.gov

RE: 2018 SOUTHEAST FINFISH, BOARD OF FISHERIES HERRING PROPOSALS

Chairman Jensen and members of the Board of Fisheries,

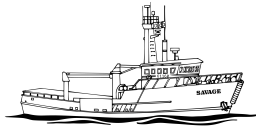
Thank you for the opportunity to comment on herring proposals during the Southeast cycle. I am writing to provide comments on the following:

Support for proposals 94,104, and 107

Oppose proposals 95, 96, 98, 99, 100, 105 & 106

I am the owner/operator of the F/V Savage and have participated in a variety of fisheries from 1981 to current, from Southeast to the Bering Sea. I bought my boat in 1990 when I was 26 years old and have worked hard for the permits that I have fished and have a deep respect for the management of Alaska fisheries. I am a Sitka sac roe permit holder and have participated in the fisheries as a tender and as a permit holder.

I support the ability of the Alaska Department of Fish and Game (ADF&G) to manage harvest opportunity based on sustainability and available biomass. Sitka herring is one of the most studied fisheries managed by the State of Alaska. This is important as it thus includes all stakeholders and takes into account local and indigenous knowledge, this is one of the great strengths of Alaska's management. It is also important to continue to study this fishery, as herring are a vital part of the food chain and as ocean conditions change it is essential to track any modifications to behavior, migration, range, and reproductive patterns. At the Fisheries Climate Change Conference, global experts supported indications that many species were not necessarily decreasing but were moving because of climate change. Therefore, it is imperative that ADF&G is given the management flexibility to effectively study and conduct a sustainable fishery to ensure that fishermen and communities have adequate access to the resource, the science, and the collected knowledge so that the resource is available for the coming years.



PROPOSAL COMMENTS:

Proposal 94, SUPPORT- Reduce the amount of herring spawn reasonably necessary for subsistence in Sitka Sound.

Subsistence harvest of herring eggs is an integral part of Southeast subsistence and indigenous culture, however I oppose using a decline in subsistence participation to justify restraints to management of the commercial fishery.

Proposals 95 & 96, OPPOSE- Repeal the commercial sac roe herring fishery in Sections 15-B and 15-C. Repeal the commercial sac roe herring fishery in Section 11-A.

ADF&G needs to retain the management flexibility to execute sustainable fisheries. Closing an area to commercial harvest will not increase participation in subsistence herring roe harvest, which is the primary reason that subsistence harvest is in question.

Proposals 98, 99 & 100, OPPOSE- Reduce harvest rate for commercial herring fisheries in the Southeastern Alaska Area. Reduce maximum harvest rate used to establish the commercial sac roe herring fishery guideline harvest level in Sections 13-A and 13-B from 20% of the spawning biomass to 10% of the spawning biomass. Amend formula used to calculate guideline harvest levels for the commercial herring sac roe fishery in Sections 11-A, 15-B, and 15-C.

ADF&G has decades of experience and a proven track record for sustainably managing herring. As with all species, there are natural spikes and dips in herring biomass. This is part of the cyclical nature of natural renewable resources. T

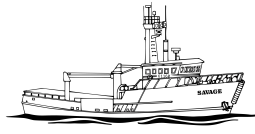
Proposal 104, SUPPORT- Repeal closed waters in the District 13 commercial herring fishery.

The closure of the core area was designed to restrain commercial harvest and restrict ADF&G management ability. Additionally, having an area closed to commercial harvest does not guarantee that herring will spawn in that area.

Proposals 105 & 106, OPPOSE- Expand closed waters in the District 13 commercial herring fishery. Expand closed waters in the District 13 commercial herring fishery.

It is important to note that closing a herring fishing area will not force herring to spawn in that area. ADF&G has decades of information on herring spawn area and deposition that indicates herring will spawn where they want, not where we want them to and changing ocean conditions will continue to impact herring behavior and patterns.

Proposal 107, SUPPORT - Management plan for herring spawn on kelp in pounds fisheries in Sections 3-B, 12-A, and 13-C, and District 7. Establish a herring spawn on kelp commercial fishery in Sections 13-A and 13-B.



I believe that mariculture is important for Alaska, as it allows for responsible resource enhancement. As the farmed seaweed industry grows in Alaska, providing more opportunity for farmed macrocystis to be used in the open pound roe on kelp fisheries will help explore new markets and add value to the fisheries as well as protecting indigenous and traditional seaweed and roe on branch/kelp subsistence harvest.

Thank you for your time,

Sincerely,

A handwritten signature in cursive script that reads "Tomi Marsh". The signature is written in a dark ink and is positioned below the word "Sincerely,".

Tomi Marsh

tomimarsh@mindspring.com