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Cordova District Fishermen United

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February 24th, 2022

Alaska Board of Fisheries

PO Box 115526

Juneau, AK 99811-5526

Email dfg.bof.comments@alaska.gov

RE: Comments on herring proposals for Southeast Finfish Meeting, March 10-22, 2022 – Opposition to Proposals 156, 157, & 158; Support for Proposals 159, 160, & 161

Dear Chair Carson-Van Dort and Board of Fish Members:

Cordova District Fishermen United (CDFU) stands in solidarity with the many fisheries associations and commercial fishermen attending the Anchorage Finfish meetings and wish to formally submit our support for Proposals 159, 160 and 161, and provide our strong opposition to Proposals 156, 157, and 158.

CDFU is a non-profit membership organization representing over 900 commercial fishing families who participate in commercial fisheries in Alaska's Area E, which includes Prince William Sound, the Copper River region, and the northern-central Gulf. It is our mission to preserve, promote, and perpetuate the commercial fishing industry in Area E and to promote safety at sea, legislation, conservation, sustainable management for the mutual benefit of all our members. Many of our members participate in the Sitka Sound herring fishery. They depend on that fishery for their livelihood. Modifying the harvest rule, as suggested in Proposals 156 and 157, would be burdensome to fishermen and processor operations and could cause the herring fishery to be unprofitable in some years at a time when the herring biomass is thriving under successful and 3 decade running harvest rules and management. Proposal 158 if in place the past 40 would have eliminated the fishery in six of those years and would certainly do the same in future years. This could occur even when the biomass is exceptionally high. CDFU is not aware of any biological data or evidence that justifies a harvest rate reduction. ADF&G manages the herring fishery conservatively for over five decades and the biomass has risen from 5,000 tons in the 1970's to 55,000 in more recent years, and to an all-time high of 200,000 tons last year. This biomass increase is a testament to ADF&G's sound fishery management.

CDFU strongly supports the subsistence herring egg fishery, however subsistence participation has declined steadily over the past thirty years. Sitka sac roe fishermen have even helped with the harvest of herring eggs on branches in many of the last 15 years, this in itself demonstrates there is a reasonable opportunity in concert with the commercial fishery.

Sincerely,

Gerald McCune

President of the Board, CDFU