

PROPOSAL 94

5 AAC 01.716. Customary and traditional subsistence uses of fish stocks and amount necessary for subsistence uses.

Reduce the amount of herring spawn reasonably necessary for subsistence in Sitka Sound, as follows:

The amounts reasonably necessary for subsistence (ANS) should be based on good data which is available. Lower the ANS to 60,000 to 120,000 pounds or recommend a program for further study to corroborate Southeast Herring Conservation Alliance (SHCA) harvest numbers.

What is the issue you would like the board to address and why?

The ANS for Section 13-A and 13-B is based on anecdotal information. There is better information upon which to base the ANS.

Herring eggs on branch harvest has not been well documented by weights and measures during the period from 1970 to 2008. However, in 2009 and 2010, SHCA conducted a herring eggs on branch harvest program with a strict protocols for weights, measures, and mapping. No data are available for 2011. In 2012 through 2017, the program was continued utilizing the same methodology for weighing, measuring, and mapping herring eggs on branches.

During the study period from 2009 to 2017, it is evident that variation in the herring egg branch harvest is not due to the sac roe fishery, but rather timing of spawn, spawn duration, weather, and participation effort. According to the Alaska Department of Fish and Game Subsistence Division, participation in herring egg branch harvest has declined over time. SHCA observations confirm low participation. The SHCA egg harvest program has demonstrated that a harvest of 30,000 to 40,000 pounds saturates the gifting of eggs in Sitka. Additional eggs are certainly harvested by individuals, whom we have also monitored, but there is insufficient effort to harvest more than 50,000 pounds.

SHCA's work provides a basis for the ANS numbers in regulation. The ANS was established decades ago based on anecdotal estimates, yet when SHCA had some of the same harvesters who helped establish those numbers on the subsistence harvest boat, the estimated weights compared to certified scale weights repeatedly demonstrated a factor of 1 to 3.5. For example, the 2009 data show estimated weights were 3 to 4 times higher than the true certified weights. SHCA harvesters found certified scale weights of 3,000 pounds of herring eggs were consistently judged to be 9,000 to 12,000 lbs., an over-estimate of 6 to 9,000 lbs.

The current ANS numbers for herring eggs are not founded on good information. If the current ANS 136,000–237,000 were not being used as a tool to shut down the sac roe herring fishery it would be immaterial, however, the ANS has been artificially inflated for that very reason. The fact is, it is possible to harvest this amount of eggs, although 186,000 pounds, the mid-point of the ANS, based on SHCA's work it would require 300 four inch+ diameter hemlock tree sets, and five or six forty-foot boats with hydraulics to harvest the eggs in the 10 day spawn period.

PROPOSED BY: Southeast Herring Conservation Alliance

(EF-F17-083)
