

H. Robin Samuelsen, Chairman
Bristol Bay Economic Development Corporation
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January 25, 2019

Doug Vincent-Lang, Commissioner
Sam Rabung, Director, Commercial Fisheries Division
Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
Sent via email

Subject: Allowable catch and assessment of Togiak Herring, 2019

Dear Commissioner Vincent-Lang and Director Rabung:

We are writing to bring to your attention our concerns with ADF&G's recent Togiak herring forecast released 12/13/18 and the setting of the 2019 allowable catch for the stock. The announcement contained a substantial decrease in the allowable harvest in 2019 and the rationale for doing so was inconsistent with our understanding of events and available information. We ask you reconsider the approach. Our concerns stem from the following.

- Lack of public process and communication with stakeholders prior to a substantial shift in a prescribed allowable exploitation rate.
- Insufficient funding was cited as a reason, despite several offers by stakeholders to provide adequate funding to estimate biomass.
- Assertion that a 30% reduction in exploitation year-over-year is a gradual reduction.

The purpose of this letter is to convey our perspective on the process to this point, and to ask the Department to reconsider its plans for the Togiak herring fishery and stock assessment in 2019. Specifically, we ask you reconsider the exploitation rate that is used to set the allowable catch in 2019 and work with us to ensure that a robust biomass estimate is obtained from the 2019 spawning event.

Public process

The Bristol Bay Board of Fisheries (BOF) meeting had wrapped up immediately prior to the Department's December news release of the Togiak herring forecast. During the BOF meeting in Dillingham, the Department provided a staff report on herring, and several herring proposals were considered by the Board. During the BOF meeting, the Department did not mention their planned decrease in the exploitation rate from 20% to 14% for the upcoming season.

We do not question whether the department has the authority to decrease the exploitation rate based on a conservation concern for the stock. However, in other Alaska herring fisheries the Department has worked with the BOF (through its public process) to adapt/modify the management plan to address changing exploitation rates. For example, in the Southeast herring fisheries the BOF has adopted into regulation a sliding scale harvest rate. See 5AAC 27160 (g)¹.

SLIDING SCALE HARVEST RATE: The allowable harvest is based on a graduated scale that allows for higher harvest rates as a herring population increases relative to the threshold level. This approach maintains annual harvest rates between 10% and 20% of the forecast spawning stock if the forecasted biomass is greater than established threshold levels. When the spawning stock biomass is at the threshold level, a 10% harvest is allowed. The allowable harvest increases an additional 2% for every spawning stock biomass increase of an amount equal to the threshold level and reaches a maximum of 20% when the population is six-times the threshold level.

The Togiak herring stock has a threshold set in regulation at 35,000 short tons of biomass [5AAC 27.060 (c)]. The approach noted for SE herring (above) would translate into an exploitation rate of 20 percent for the 2019 Togiak herring season since the forecasted biomass (217,548 st) is 6.2 times that of the established biomass threshold.

We believe greater public process will lead to better outcomes for the herring stock, the fishery, and the State of Alaska. The good news is that there is still time to achieve these outcomes.

Stakeholder Participation and Intent to Collaborate

The rationale for dropping the exploitation rate substantially was that the Department had been unable to obtain biomass estimates by aerial surveys for the last three years. The Department cites reasons for not achieving an appropriate aerial biomass survey were "... because of budget cuts and poor weather". Poor weather affecting the aerial survey is understandable, although its effects have been mitigated in the past with the aircraft and surveyor stationed in Togiak instead of Dillingham. In any event, citing budget cuts as a primary reason is confusing because our understanding is there was adequate funding. The fishing industry has offered additional resources to ensure a robust herring program for two years and has provided both financial and logistics support in previous years. Our understanding is also that a robust program must include efforts to characterize the age and biomass of fish that arrive after the commercial fishery has wrapped up; yet this has not been included in the scope of several recent annual assessments.

¹ From ADF&G publication <http://www.adfg.alaska.gov/FedAidPDFs/RIR.1J.2018.02.pdf>, page 4.

The value of the Togiak herring fishery is substantial and hence stakeholders' willingness to assist. ADF&G is a signatory to the Bristol Bay Fisheries Collaborative (BBFC), along with the Bristol Bay Science and Research Institute (BBSRI), a subsidiary of the Bristol Bay Economic Development Corporation (BBEDC). ADF&G and BBSRI recognized the value of the Togiak herring fishery and the importance of obtaining biomass estimates by including Togiak herring assessment in the "core program" of BBFC assessment projects². In addition to the value of the herring fishery on its own, the BBFC working group concluded that a healthy herring fishery benefits the commercial salmon fishery by helping reduce tendering and processing costs in the short-duration salmon fishery. Finally, robust Togiak herring assessments are necessary to provide the best available information to set limits on herring taken as prohibited species in the federal Bering Sea/Aleutian Islands groundfish fisheries.

Through BBFC, BBSRI and industry partners brought financial commitments to conduct a robust herring assessment program the past two years to ensure the Department could estimate the biomass, model recruitment, and set allowable catch. ADF&G responded in each of 2017 and 2018 that it had enough funds to make stakeholder support unnecessary. In both years, stakeholders specifically sought confirmation that ADF&G had enough resources to estimate biomass. The Department further clarified in the 2018 outlook.

"The department has secured funding for the 2018 herring season sufficient to fly aerial surveys and process herring for age, sex, and length samples. This will allow staff to resume the use of the ASA model for forecasting herring biomass."

Hence, our disappointment to learn in mid-December 2018 that the primary reason for the substantial cut to the allowable catch was that ADF&G did not have adequate resources to estimate biomass in previous seasons.

Gradual Approach to Change?

From the 2019 herring forecast (emphasis added):

"A 14% exploitation rate is within the range of current exploitation rates used for herring around Alaska and British Columbia and provides a gradual approach for being more conservative with a multi-year absence of reliable survey biomass information."

Going from 20% to 14% is a 30% reduction in the allowable catch, which does not appear to represent a gradual approach. We appreciate and are concerned as well about the growing uncertainty in the biomass estimates from relying on older data. However, the data that has been gathered the last three years suggests the Togiak herring stock is more likely to be increasing, and certainly not dramatically declining. Gulf of Alaska herring stocks appear to have responded differently in recent years, but it is difficult to see using those events to substantially reduce the outlook for this Bering Sea herring stock.

² See: *Working together to protect the management system for the world's most valuable salmon fishery: a proposal to address eroding financial support to salmon and herring management in Bristol Bay, Alaska*. Available from: www.bbsri.org/bbfc.

The Department has indicated that if a spawning biomass estimate is not obtained in 2019, the exploitation rate will be reduced by a further 2 percentage points in 2020. Going from 14% to 12% will result in a further 15% reduction in harvest in 2020 over the proposed 2019 harvest rate. Combined, this represents a 40% reduction in allowable catch over two years.

Moving Forward

We believe the economic impacts of insufficient assessment of the Togiak herring stock warrant a closer look by the Department. Does all available information on the stock's status warrant a 30% reduction in the allowable harvest in 2019? As importantly, what can be done to ensure that a robust biomass estimate is obtained in 2019? You can appreciate our apprehension with waiting another season with the hope that survey effort and age sampling will be adequate to estimate age-specific biomass across all temporal components of the 2019 spawning event. We ask that the Department consider the following.

1. Reconsider the preseason target and set the exploitation rate and allowable catch to a more reasonable rate given the best available information as to the health of this stock.
2. Develop an adequate and robust survey program for 2019 that maximizes the chance of getting a robust biomass estimate.
3. Be prepared to make inseason adjustments to the allowable catch based on a survey program described in bullet 2 (above).

We appreciate your attention to this matter and, again, offer to assist and collaborate with the Department to obtain a robust assessment for this valuable fish stock.

Sincerely,



H. Robin Samuelson, Chairman, Bristol Bay Economic Development Corporation

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