

RC submitted by Marty Jacques, General Manager of Leader Creek Fisheries.

December 6th, 2015

Comment on Proposal 89. "Delete references to sac roe in the Bristol Bay Herring Management Plan."

Board Members,

The current Togiak Sac Roe fishery in no way resembles the fishery of the 80's and 90's when there was a high demand herring roe. Year after year the demand for this product diminished, both in volume and value. Combining that higher operating costs, shipping costs and a stronger US dollar versus the yen, has made this a very marginal fishery, at best.

The fishing fleet and processing industry have continually worked to gain any little increase in value possible. There have been efforts to be more efficient at the plants. There have been efforts between fleet and markets to improve quality of the product. These efforts have all helped to keep the fishery viable, though barely.

None of these efforts would have been possible without the help of Fish and Game. The department has been very willing to work with the industry, while battling budget cuts. Tim Sands has done an excellent job trying to give all participants the ability to improve, while also working very hard to follow the management guidelines for allocation and sustainability. All this has taken place in a fishery that stretches 120 miles, and in most places is exposed to severe spring weather. It is not an easy fishery to prosecute!

I don't think anyone really knows how this fishery will evolve in the future. New markets and new processing procedures are always being searched out. The fishery could look completely different in 5 years.

The current management guidelines, and the Department's ability to adapt, has given everyone the ability to adapt. The fishery "works" at this time. It also still has all the wording to protect stakeholders, both gear groups and the fishery sustainability. I feel that there are no significant restrictions in the current regulations that will prohibit more adapting in the future.

I believe that the current management plan works, and that until possible future market changes become clearer, we should continue without changes and keep this as a "sac roe fishery." I think that removing "Sac Roe" from the description could open the door for the fishery to be looked on as a forage fishery, which could severely restrict us in the future.

Sincerely,