

Suggested Language:

5AA 27.865. Herring management plan

- (a) When managing the Bristol Bay commercial herring fishery, the primary objectives of the department are to prosecute an orderly and manageable fishery, while striving for the highest level of product value with a minimum waste.
- (b) To ensure that no gear group is totally disadvantaged, the Board of Fisheries directs the department to take the following actions given the specified circumstances:
 - 5) after herring spawn-on-kelp harvest and the Dutch Harbor food bait fishery have been subtracted, the remaining harvestable surplus is allocated to the Togiak District herring fishery; the department shall manage for a removal of 20 percent (30 PERCENT) of that surplus by the gillnet fleet and and 80 percent (70 PERCENT) by the purse seine fleet.

I disagree with the amended language in RC 77 submitted by Robert Heyano. The reason why the Nushagak AC took position on this proposal with the amendments was because they were concerned on loosing part of the quota to the Dutch Harbor Food & Bait Herring Fishery. This action was based on fear and wanted to protect the quota in the event market conditions change for Togiak Herring.

I believe that there should not be any allocation decisions within the commercial Togiak Herring Fishery and Dutch Harbor Food & Bait Herring Fishery. Personally, the un-harvested commercial roe on kelp should be allocated for subsistence purposes. In addition, the un-harvested seine and or gillnet quota, should be left in the water to spawn, not only for subsistence reasons, but also for the health of the ecosystem. This is what we hear from the locals in Togaik, which was highlighted in decisions made by the Togaik AC to oppose all the herring proposals.

Being in contact with Robert
on clarifying language I first
had no problem with his recommendations
until this AM reading them. I
would prefer leaving it alone
no changes ^{vw} allocation w/ subsistence future returns
Jim