

The concerns of the Dept. listed in RC2 are listed in chronological order along with my response for proposal 107.

The issue of more spawn on kelp production may have a negative effect on ROK prices:

I believe it is not an issue like what we have now. We are shorting the market every year. There may come a time when the market looks to Canada or even Russia to get more. I don't know if its good to short a market continually. We used to have 4 fisheries now we have 1 and possibly having one more if the right conditions happen. Remember with Salmon, we shorted the market, then came farmed fish.

As for kelp populations:

This fishery here in Sitka is way earlier than Hoonah Sound or Tenakee. But they are not being monitored anymore. And the kelp does not go to Craig. As for an increase in cost of management. This would be in town. The department has lots of boats and biologists staying somewhere while here for Sitka Herring. It would be managed like Craig. It could be close to the same cost as Craig. It would be managed by the same 3 or 4 people, probably a couple of skiffs, planes flying and that is how Craig is managed also.

If a fisherman fishes, he pays raw fish tax to the State.

If a fisherman doesn't fish because of resource problems, he justifiably pays no taxes.

If a fisherman doesn't fish because of bureaucracy that makes no sense.

As for communicable diseases:

All we can look to is after 25 years of pounding close pounds, it has never happened and as for the amount of herring used in all our pound fisheries, the department figures 20 tons is in a pound, so if you have 30 participants, that would be 15 pounds which is 300 tons. If all 100 permit holders were here, that would be 1000 tons.

As for conflict of areas:

This area is big and pound structures are strong and we can go where the department says to go. The question of the department acting quickly, and can they do it. Last year in Craig, the herring never came into the open area after about 4 days. The department closed that area and the next morning, opened the closed area because they had been monitoring the closed area. Same goes for here, the department everyday flies the area they know where the herring are at. I believe they could call a quick opening. They even do it here in Sitka, they tell the guys to standby on 2-hour notice.

As for their last concern in the RC 2 proposal 107, Legal issues:

There is a big paragraph on legal issues. With the CFEC comment on proposal 107 that issue is taken care of. In their comment "such a herring spawn on kelp pound opportunity in Sitka sound is possible under CFEC regulation 20 AAC05. 230(a)(9) which defines the northern southeast spawn on kelp pound areas to include section 13A and 13B. And in the herring regulation book 5AAC27.185, there are 8 pages of gear regulations for ROK fisheries in Southeast Alaska. I believe all the regulations are there. We don't need to reinvent the wheel.

And one public comment was, it would be hard to predict a fishery:

It's just an opportunity and one thing about pound guys is that they know how to get from one place to another if they must. Also, all you have to read is the department updates out of Sitka that come out every day and you will know what is going on. Another comment was about the transition from sac roe to roe on kelp, but that is not what this proposal is about.