

Chairman Jensen and the Board,

I am writing in support of proposal 99. I have often heard from the sac-roe industry that Fish and Game already manages the Sitka Sound Sac-Roe fishery as conservatively as possible. While Fish and Game certainly does a good job at the task they have been assigned to, there are certainly alternative management strategies that would provide more desirable results. For example, based on midden pile analysis across Southeast Alaska, the amount of harvested herring was on par with harvested salmon over centuries-long periods (see PC83). It is unclear if the Sitka Sound population has reached parity with salmon as a benchmark, however, herring populations in other parts of the region are non-existent or a tiny fraction of their historic levels. There are management strategies, which if properly studied, could lead to increased herring populations in Sitka Sound and beyond. For example, identifying critical brooding areas and closing them to harvest, or laying out additional spawning substrate (ie hemlock branches that would go unharvested) to ensure a bumper crop (see PC83). I often hear fishermen bemoan the fact the Fish and Game have so few tools besides cutting harvest rates. Herring represents an opportunity to study and practice restorative management, giving Fish and Game more tools in the future. In the meantime, given the uncertainty in the model and a poor record of meeting the ANS (only 3 years out of the last 10), the only prudent course is to take a precautionary approach to the fishery by lowering the GHL.

Sincerely,

Matthew Jackson of Sitka