

**PROPOSAL 89**

**5 AAC 38.142. Southeastern Alaska Geoduck Fishery Management Plan.**

Modify the method for establishing the guideline harvest level in the Southeastern Alaska Area commercial geoduck fishery, as follows:

(g) The guideline harvest level for each area will be calculated as two percent of the most recent estimated biomass, **using the mid-point of the one-sided 90 percent confidence interval**, per year.

**What is the issue you would like the board to address and why?** The Southeast Alaska Regional Dive Fisheries Association (SARDFA) would like to have ADF&G establish the Guideline Harvest Level for the geoduck clam fishery using the mid-point of the one-sided 90 percent confidence interval based on their assessment surveys. This would allow for a higher GHIL while maintaining a conservatively managed fishery.

*What would happen if nothing is changed?* There would remain annual confusion as to whether ADF&G is managing for the lower end of the confidence level or the mid-point.

*What are other solutions you considered? Why did you reject them?* It is possible to discuss on an annual basis the department’s management goal, however SARDFA believes this would eliminate any confusion on how the fishery is being managed.

**PROPOSED BY:** Southeast Alaska Regional Dive Fisheries Association (HQ-F17-064)

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**PROPOSAL 90**

**5 AAC 38.142. Southeastern Alaska Geoduck Fishery Management Plan.**

Open previously non-surveyed fishing areas to a limited commercial harvest of geoducks without a pre-fishery stock assessment survey, as follows:

(g)(1) The department may open for commercial harvest areas that have not been surveyed in order to identify areas that may have commercially viable geoduck beds.

**What is the issue you would like the board to address and why?** The Southeast Alaska Regional Dive Fisheries Association (SARDFA) would like to work with ADF&G in opening new geoduck clam areas in Southeast Alaska. Geoduck beds are difficult and expensive for ADF&G to survey and open. SARDFA would like for ADF&G to open areas that have not been surveyed to identify where commercially viable beds might be. If after a small controlled fishery it is determined there is a commercially viable geoduck bed ADF&G would do an official assessment survey and establish a Guideline Harvest Level for future years.

*What would happen if nothing is changed?* Status quo remains and it becomes more difficult and expensive to expand the geoduck fishery.

What are other solutions you considered? Why did you reject them? ADF&G or SARDFFA could do exploratory dives to locate beds, but this is expensive and unreliable for both ADF&G and SARDFFA.

**PROPOSED BY:** Southeast Alaska Regional Dive Fisheries Association (HQ-F17-065)

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## **PROPOSAL 91**

### **5 AAC 38.142. Southeastern Alaska Geoduck Fishery Management Plan.**

Establish a weekly geoduck harvest limit of 1,000 pounds per diver in the Southeastern Alaska Area, as follows:

(n) A calendar weekly limit of 1,000 lbs. of geoduck clams harvested and landed per licensed geoduck clam diver is imposed. The calendar week begins on Monday night 12:01 am AST and ends on Sunday night at 11:59 pm AST. A 10% overage is allowed with the sale of the overage deposited in a separate ADFG account which will be used to offset the annual ADFG operating budget for the management of this fishery.

**What is the issue you would like the board to address and why?** The geoduck clam fishery is a small and unique fishery. These large clams are individually harvested by divers. They are harvested, transported and delivered to overseas markets **alive**. Geoducks clams have a limited "shelf life" and the difference in value between a dead, processed clam and a live clam is large. Almost unbelievably so, the difference can be \$1.50/lb. compared to \$15/lb. Our manner of fishing, a 6 hour "free for all," damages the value of our resource and damages Alaska reputation as a leader in high quality seafood.

The problems associated with our current fishery regime have been endemic in our industry for more than a decade. We routinely overwhelm air cargo and its capacity to timely deliver this product to its destination. We overwhelm the boxing facilities and purchasers capacity to effectively transport and sell this live clam due to the production uncertainties of a "free for all" fishery. Every other North American jurisdiction that has a geoduck clam fishery has imposed trip limits, individual fishing quotas, individual vessel quotas or marketing quotas to address the price differential between live and processed and between market demand and supply. The overseas markets demand and will pay top dollar for high quality product. As long as the harvest operates with the understanding, this is a highly perishable product that commands a premium price when intelligently marketed. By imposing these limits, other than a simple time limit, the fishermen, achieve prices that can be **4 to 10 times** greater and not create market disruptions.

These numbers make a tremendous difference in the overall value of our fishery and the fish tax paid to Alaska. We have written into regulation that this is a "live market" fishery because of the substantial market value increase associated with this harvest strategy. This increased value is tremendously important since we self-fund our fishery through SARDFFA. This is an important point, the fishermen, pay for the cost of this fishery. The cost does not come out of the General fund. We have substantial costs associated with the required DEC annual water quality testing, the DEC's weekly PSP testing per area and the ADFG's administrative and survey budget required to open our fishery. There have been prices paid for our harvest that do not meet these costs and it

has been a continual struggle since this fishery's establishment to meet these ongoing and ever increasing regulatory costs.

This proposal seeks to eliminate the other factors in the fishery that contribute to our low prices and poor market reputation. Beyond the desire for intelligent marketing is another and graver concern regarding diver safety. Geoduck clams do not move, most of the beds with the "faster digging" are known to the divers. ADFG's directing a fishery by time, contributes to overcrowding of vessels and divers on these "better" areas with diver entanglements and physical altercations a routine occurrence. By spreading out the harvest time and placing a weekly trip limit on the fishermen the necessity of these unsafe practices will be greatly reduced. Why is that? There are many beds that are small with lower densities or deeper which limit a diver's productivity which aren't utilized due to this "free for all" fishery. This may have the corollary effect in giving ADFG more bed information through our logbook program and the potential to possibly increase quotas via the addition of new beds.

**PROPOSED BY:** Cornelis "Casey" Bakker

(EF-F17-072)

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