



Southeast Alaska Fishermen's Alliance

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March 15, 2022

Alaska Board of Fisheries

Board Support Section

Re: Questions to consider on Proposals #171-174 to change the season date

Dear Chair Carlson-Van Dort and Board of Fisheries members,

Of the approximately 100 active fishery participants (range of 90-110 recently) our members hold approximately 38 of those permits and all of them are active fishermen of those 38 only 2 members asked us to support a summer fishery and both of those are newer entrants to the fishery. We oppose moving the shrimp fishery.

Here are some questions that you might like to ask the Department on the record before making a decision on the changing the shrimp season.

- What effect will there be having the fishery before the survey? How will you adjust for that difference?
- How will you adjust the commercial GHLL's without the weight of the eggs as part of the poundage? What will that differential be?
- Will there be more mortality in a spring/summer season due to handling in the molt and growth stage as was assumed in 1997 in establishing this fishery?
- How will you reconcile the difference in CPUE of the fishery with the different season date of will a lower CPUE automatically be assumed to be lower biomass and not slower to the pot as long-time fishermen that fished summertime believes will happen based on their experience?
- What would be the season length? Will there be a cleanup fishery in the fall and what effect would that have?
- How much effort and in what districts are you seeing any harvest in the spring fishery currently? And if there is so much desire by the fishermen for a spring fishery, why do you think the participation is so low?

- What is the data from the 2018 harvest record for sport and personal use for the years it was in place? What were the number of permits issued? Will this become a conflict between the commercial fishery and the personal use sport fishery as you hear about in the crab fishery?
- Will there be gear conflicts with other commercial fisheries using the same areas (Salmon THA fisheries in the spring and if the fishery is long enough the salmon fisheries as a whole).
- How will you manage the District 7 fishery which currently has an in-season management program and changing GHL based on CPUE/SIZE from the freezer processors?
- How will you manage the fishery that can already be very fast paced if you had a lot of the latent permits become active? (60% latency currently)

Additional information that wasn't provided is that shrimp larvae are free floating and go where they will on the whim of tide, current and wind. They only stay within an area after the juvenile stage.

Please review RC 30 for more detailed information and please read page 2 of RC 30 where the 2002/2003 staff comments are copied as well as the biological considerations that were part of the original 1997 decision on this shrimp fishery. **Biology was one of the main considerations at that time the current fishery management was established and there have not been many new studies since that time.**

You will need to **review the allocation criteria** for these proposals and would remind you that in considering the history of the commercial fishery, you will be displacing long term fishermen that were there when this fishery management plan was developed. The newer participants appear to be those that wish for a season change bought into this fishery as it was established. And with a change in-season you will likely see many more of the permits activated, affecting those already participating in the fishery and dependent upon the income.

The question was asked but not answered, at the time of limited entry the max number was set at 332. 155 transferable permits have been issued, 158 non-transferable permits have been issued and 42 are pending of which only 20 will become a non-transferable permit.

Sincerely,



Kathy Hansen
Executive Director