

## ***Commercial (4 proposals)***

### **PROPOSAL 308**

#### **5 AAC 31.223. Lawful shrimp pot gear for Registration Area E.**

Reduce the total number of shrimp pots allowed in the Prince William Sound shrimp pot fishery, as follows:

5 AAC 31.223. Lawful shrimp pot gear for Registration Area E

...

(e) Shrimp pots may only be operated as follows:

(1) the department will announce annually, before the opening of the commercial shrimp pot fishery season, the number of shrimp pots that may be operated from a vessel in the commercial shrimp pot fishery for that season, not to exceed [100] **25** shrimp pots per vessel; in determining the annual pot limit, the department will consider the

**What is the issue you would like the board to address and why?** Currently vessel pot limits in the Prince William Sound commercial shrimp fishery management plan are set to a maximum of 100 pots per vessel. This is a small fishery in a relatively restricted fishing area with very high levels of participation. Department managers have never set a pot limit over 60 pots and we have not had a pot limit of over 40 pots since 2015. In three of the last 5 years we have had a pot limit of 25 pots and the fishery prosecuted quite successfully. Despite the lower pot limits, during the first opening when up to 60+ vessels participate, it feels like there are shrimp pots at every conceivable place you might think to set a shrimp pot. It is often very crowded and complaints about gear conflict are quite common. In areas 1 and 2 the commercial fishery overlaps heavily with the recreational fishery and there are even more pots in the water. Smaller pot limits requiring more targeted fishing are workable in this fishery, and small pot limits allow the department to more precisely target the GHJ as potential volatility in harvest levels is greatly reduced. It goes without saying that higher pot limits also would lead to more lost gear and bottom impacts from pots which is unnecessary in a fishery with a remarkably low social and environmental impact.

In general, I think that this fishery has found a healthy, unique, niche as a low barrier to entry introductory fishery. Slower paced fishing more amenable to direct marketing practices has greatly increased the per pound value by over double relative to other spot prawn fisheries elsewhere in the state. Management practices over the last few years have worked very well, the fishery has thrived, and multiple participants have developed business models working within its unique constraints and still maintaining profitability. I think that moving the regulatory maximum pot limit to numbers more in line with the limits actually used in the modern day fishery is warranted. The current unrealistic maximum pot limit in regulation leads to unknown expectations on gear requirements to participate in the fishery as the first announcement setting pot limits comes out very shortly before the fishery begins. Furthermore the unrealistically high maximum pot limit set in regulations contributes to disruptive efforts to 'over commercialize' and disrupt the orderly operation of this fishery and the unique, high value, low impact advantages that it has by repeated requests from some sectors of the fishery to allow much higher pot limits. I think the BoF should make clear and confirm the unique role this fishery has in the greater overall fisheries eco-system as a low barrier to entry, small boat, low pot limit, direct market fishery.

In general, this fishery is currently in a state of flux and there is a lot of uncertainty surrounding many aspects of it. I have participated extensively in this fishery since its reopening in 2010 and have been heavily involved with the board of fish process regarding the current management plan.

This proposal is part of a suite of proposals in which I attempt to anticipate potential issues that exist currently, may arise during the 2024 season or ongoing CFEC process regarding potential limited entry for this fishery, continued uncertainty from the department regarding the current survey and biometric surplus population model, and narratives coming into the 2025 regulatory meeting. I feel that there is significant likelihood of the need to review and adapt much of the current regulatory plan and am submitting proposals concerning several aspects of the plan in order to foster discussion, and serve as a starting point if the need for serious revision of the plan is thought necessary.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** I have discussed the management of this shrimp fishery with multiple ACs, other participants in both the recreational and commercial fisheries, and ADFG staff many times and will continue to do so leading up to the 2025 meeting.

**PROPOSED BY:** Joseph Person

(EF-F24-072)

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**PROPOSAL 309**

**5 AAC 31.510. Fishing Seasons for Registration Area J.**

Change season dates for Registration Area J commercial shrimp fishery, as follows:

In Registration Area J, shrimp may only be taken from **April 1 through December 31** [JUNE 1 THROUGH FEBRUARY 28] and only under the terms of a permit issued by the department. In the permit, the department may specify

- (1) fishing area;
- (2) logbook requirements;
- (3) biological sample collection requirements;
- (4) reporting requirements;
- (5) time-period specific harvest limits (trip limits); and
- (6) any other conditions that the department determines as necessary for conservation or management of the fishery.

**What is the issue you would like the board to address and why?** This proposal addresses a season timing issue for the commercial shrimp fishery in Registration Area J to improve market development, safety, and diversification opportunity. The current fishing season begins at the same time as the salmon fishery, so the small boat fleet that participates in salmon is only able to participate in this shrimp fishery in the fall and winter months with more inclement weather. Moving the start and stop dates forward allows for smaller boats that are busy in the summer months to explore this experimental fishery when the weather is better resulting in increased safety conditions and seasonal opportunity. Furthermore, the current season timing in regulation focuses harvest of shrimp when they are often full of eggs. Developing markets have indicated more demand for shrimp with no or fewer eggs due to meat retention issues, so this proposal change would assist in meeting that demand by working in harmony with processor interest.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** No

**PROPOSED BY:** Christopher Johnson

(HQ-F24-055)

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**PROPOSAL 310**

**5 AAC 31.210 Shrimp pot fishing seasons for Registration Area E.**

Remove the Prince William Sound shrimp pot fishing area rotation, as follows:

We propose doing away with the tri annual rotation and instead opening all three areas each year each with their own separate harvest limits.

5 AAC 31.210. Shrimp pot fishing seasons for Registration Area E

(a) ...Fishing in this area will be [ROTATED ON A TRI-ANNUAL BASIS BETWEEN THE FOLLOWING WATERS] **divided into the following districts**

5 AAC 31.214. Shrimp pot guideline harvest level for Registration Area E

...The guideline harvest level for the commercial pot gear fishery in the waters described in 5 AAC 31.210(a) is 40 percent of the total allowable harvest for the area. **This GHL will be divided between the districts described in 5 AAC 31.210(a) annually based on the pot survey CPUE for each district.**

**What is the issue you would like the board to address and why?** We would like the department to stop the rotation of commercial areas. The spot shrimp population in PWS is in trouble, with decreasing survey results and a large drop off in CPUE in both the commercial and noncommercial fishery. We believe this is in part due to the area rotation on a tri-annual basis that this regulation requires. Under current regulation, the department sets a total allowable harvest every year based on their population model for the entire Sound. It then allows that entire harvest to come from one of three small areas each year. This results in heavy fishing pressure on the less productive areas like area 3 which currently does not have 1/3 the shrimp biomass. Opportunity to best protect the resource is being missed when the department is using this system to set the harvest/ limit the same for the less productive southwestern part of the Sound as it does for the northern areas with robust shrimp populations. The shrimp population would be better protected by taking a small harvest in each area every year, instead of a large harvest in one area every three years.

We hope the department uses this opportunity to propose a more appropriate shrimp management plan with areas based on shrimp population densities and habitat, not the crude square boxes currently being used.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.**

**PROPOSED BY:** Cordova District Fishermen United (CDFU)

(EF-F24-141)

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**PROPOSAL 311**

**5 AAC 31. 2XX. New section.**

Allow vessels participating in the Prince William Sound shrimp pot fishery to also operate as tenders, as follows:

Create new regulatory language that allows boats to act as tenders while also participating in the fishery. That way fishermen could put all of their catch on one boat to take to a processor. Regulation like this is currently in place for the Kodiak District Dungeness fishery.

5 AAC 31.2XX Tenders for Shrimp

**Notwithstanding 5 AAC 31.033, in the Prince William Sound Area, a vessel registered to fish for shrimp may tender shrimp from other registered shrimp vessels. A tender operator must be an authorized agent of a processor. Before using a vessel as a tender under this section, the tender operator shall register as a tender with the department at the department office. A tender operator shall complete an ADF&G fish ticket at the first point of delivery from the catcher vessel.**

**What is the issue you would like the board to address and why?** Allow vessels that are participating in the shrimp fishery to also be used as tender vessels to transport shrimp back to port. Fresh shrimp need to be frozen or sold within three days of harvest. It doesn't make sense for 50 shrimp boats to all run back and forth to town every three days when they could simply consolidate their catch on one boat. The low volume in these fisheries make it difficult to afford a dedicated tender vessel. Allowing participants to tender would greatly increase the profitability of this fishery. It would also enable more access to this resource for local Prince William Sound communities and processors.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.**

**PROPOSED BY:** Cordova District Fishermen United (CDFU)

(EF-F24-140)

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