

***Shrimp (13 proposals)***  
***Management Plan (6 proposals)***

**PROPOSAL 299**

**5 AAC 31.XXX. New Section. and 5 AAC 55.055 - Prince William Sound Noncommercial Shrimp Fishery Management Plan.**

Develop a Prince William Sound pot shrimp management plan, as follows:

Board action to compel the Department to develop a comprehensive PWS pot shrimp management plan in accordance with 5 AAC 39.200. For example, reference the SE Alaska pot shrimp management plan and the Regional Information report(1J06-08), both Department generated documents.

As a secondary measure, Consider reinstatement of 5 AAC 31.260 Prince William Sound commercial pot shrimp management plan to define management goals.

Implement a shrimp task force similar to the SE Alaska pot shrimp task force approved by the Board of Fish in 2003 (accepted in 2006 \_RIR 1J06-08), which remains un-amended. The purpose of this panel would be to develop and maintain a comprehensive management plan. Having a comprehensive plan would lead to proactive management, in contrast to the current historical reporting method used for regulatory changes, which is reactive (managed by EO).

With a comprehensive Management plan, guidance to fishery managers will exist and can be in place before there is negative resource impact. This will limit the Emergency Order process, resulting in proactive, not a reactive, sustained yield management of PWS pot shrimp.

**What is the issue you would like the board to address and why?** Currently, there is no comprehensive Prince William Sound pot shrimp management plan. The intent of this proposal is to compel the Board of Fisheries and the department of fish and game to develop a Fishery Management Plan (FMP) as supported by regulation.

To date, The PWS pot shrimp fishery is managed and guided by the regulations cited above. These regulations are useful, but not refined enough, which results in management reliance on emergency orders to operate.

These regulations are vague in the context of a FMP and do not define the specific parameters needed to effectively support the Maximum Sustained Yield (MSY) of the resource.

The existing regulations fail to address concerns such as stock assessment, reporting measures, in-season management, conservation goals, and resource access that may not be appropriately weighted, specifically given the intent or involvement of particular user groups. The goal of a comprehensive plan would be to define a framework that outlasts management changes.

A consistent definition (plan) for conservation and MSY management of this precious resource is more than appropriate.

It is necessary to develop a standing body of regulation that considers all aspects of the PWS pot shrimp fishery, for all user groups, and provide guidance for ADF&G management into the future while prosecuting the fishery in perpetuity.

We Are Addressing the Board of Fish to direct the ADF&G to support achievement of the goal defined regulation as follows.

5 AAC 39.200 - Application of fishery management plans

(a) The Board of Fisheries has implemented by regulation fishery management plans that provide the Department of Fish and Game with guidelines to be followed when making management decisions regarding the state's subsistence, commercial, sport and personal use fisheries. The primary goal of these management plans is to protect the sustained yield of the state's fishery resources while at the same time providing an equitable distribution of the available harvest between various users. The regulations contained in this section are intended to aid in the achievement of that goal and therefore will apply to all fishery management plans contained in 5 AAC 03 - 5 AAC 39.

If a Fishery Management Plan is not considered, developed, and implemented for the harvest of PWS spot shrimp, the fishery will continue to be managed in a reactionary fashion, instead of being proactive for conservation and MSY goals. Continuing to operate the fishery in this way will prevent the progressive management of this stock.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** This proposal was developed at length and with considerable input by fishery participants, The Valdez ADF&G Advisory Committee, The Whittier ADF&G Advisory Committee, the staff of the Department of Fish and Game, and ShrimpPros Association.

**PROPOSED BY:** PWS/Valdez and Whittier Advisory Committee (HQ-F24-047)

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**PROPOSAL 300**

**5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan.**

Modify the Prince William Sound noncommercial shrimp fishery management plan, as follows:

Split the TAH for noncommercial into the same areas used as harvest areas for the commercial spot fishery and manage the noncommercial fishery to achieve these individual harvest limits. This will force the noncommercial users to spread their harvest throughout the sound which is what needs to happen if the TAH is to be based on the Sound-wide population.

Modify as follows:

5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan:

(a) The department shall manage the sport and other noncommercial shrimp fisheries in the Prince William Sound Area as follows:

(1) the guideline harvest level for shrimp taken by pot gear in noncommercial fisheries is calculated as 60 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 create three areas for sport fish. The spot shrimp population 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 GH/TAH being based on the population of shrimp in the entire area, but the majority of the harvest occurring in only small sections of the area. Because the noncommercial sector harvests the majority of the shrimp, it is imperative that regulation is in place to prevent this harvest from occurring in too small of an area. We believe this has been happening for years as we've seen evidence of localized depletion of shrimp near ports in areas most accessible to noncommercial users.

**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-F24-142)  
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**PROPOSAL 301**

**5 AAC 55.055. Prince William Sound noncommercial shrimp fishery management plan.**

Modify the Prince William Sound noncommercial shrimp fishery management plan, as follows;

Modify 5 AAC 55.055 section (a) by adding:

**(4) The estimated total allowable harvest for the waters described in 5 AAC 31.210(a) must be more than 110,000 pounds of spot shrimp by round weight before a sport or personal use shrimp pot fishery may be opened.**

**What is the issue you would like the board to address and why?** The current spot prawn management plan closes the commercial fishery when the total allowable harvest for both commercial and noncommercial falls below 110,000lbs. It does not have a similar closure requirement for noncommercial, even though they harvest a larger share of the TAH. Allowing sport and personal use harvest when the population is depressed below that which could support a commercial fishery should not be allowed because these user groups have the same priority under law. We propose an identical closure of sport and PU as is regulated for commercial use if the shrimp stocks fall below the 110,000 lb threshold.

**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-F24-139)  
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**PROPOSAL 302**

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

Modify the Prince William Sound shrimp pot fishery guideline harvest level, as follows

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

[~~The estimated total allowable harvest for the waters described in 5 AAC 31.210(a) must be more than 110,000 pounds of spot shrimp by round weight before a commercial shrimp pot fishery may be opened.~~] **The total allowable harvest for the waters described in 5 AAC 31.210(a) is set at**

**150,000 pounds of spot shrimp by round weight.** 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. The department will, to the extent practicable, manage the fishery to allow no more than 50 percent of the guideline harvest level to be taken from any one statistical area. The commissioner will open and close fishing seasons by emergency order, during which pot limits, time, or area may be adjusted to achieve the 50 percent statistical area harvest target.

**What is the issue you would like the board to address and why?** Currently, the PWS total allowable harvest (TAH) is determined each year by a surplus production model. This is difficult to encapsulate in a proposal and I am sure it will be explained and discussed in detail during the Board meeting. The impetus of this proposal is that the model for the TAH is using only as variable inputs 1) Catch per unit effort (CPUE) from the department annual survey, 2) Total Harvest in the Recreational Fishery, and 3) Total harvest in the Commercial Fishery. While at first glance this seems reasonable, a closer investigation reveals that the two most impactful inputs to the model (Recreational and Commercial Harvest) are in fact determined by the model. Theoretically, the model estimates a surplus production, sets a TAH, the fishery is then actively managed to achieve that TAH, which then puts back into the model exactly what it puts out. This is reflected in the TAHs that we have had over the years being remarkably consistent. They seem to be mostly unaffected by changes in survey cpue and in fact almost all the fluctuations in TAH year to year correspond with harvest levels in the previous year sport fishery. This is because the non-commercial fishery is not able to be managed as precisely and consequently fluctuates a good bit. These fluctuations seem to be the primary influence in the TAH. This is problematic as the non-commercial harvest is not really an indice of abundance. It is an indice of angler days on the water which is heavily influenced by weather, fishing opportunities elsewhere in the state, and socio-economic factors. CPUE is consistent year to year for the most part and harvest is subsequently largely a function of effort.

I am not complaining about the model. I have intense investment in this fishery and want it to be managed to the best degree possible in order to preserve the fishery and the resource for years to come. It has been the best available science, and I have always supported it. Recently, fluctuations in the cpue of the department annual survey that have not been observed in the cpue or harvest of the sport and commercial fisheries, along with other existing factors like the one I mentioned in the previous paragraph, have led to discussions with multiple staff members where they have expressed dissatisfaction in the current method of assigning the TAH. It is my hope that by the time of the meeting we will have some sort of an idea as to a better way of assessing shrimp populations in PWS and can move forward with the best available science.

I am putting this proposal in largely as a "placeholder" in the hope that a new and better method for setting the TAH will be brought forward by the department by the time of the meeting. However, if the department no longer has confidence in the current model and a new method has not been decided upon; the best course of action seems to be to set a fixed GHLL the same way we do in most other small state waters fishery without accurate enumeration. This is very common and almost all small state waters fin fish fisheries have GHLLs set in this fashion. Usually this has been done by assessing historical harvests. Fortunately in the PWS shrimp fishery historical harvests have been overall fairly consistent. We can see that setting a TAH of 150,000 pounds, which would then be allocated 60% to the sport fishery and 40% to the commercial fishery as it currently is, would be in line with historical harvests that have been sustainable for the 14 years since the fishery reopened.

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-F24-073)  
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**PROPOSAL 303**

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

Modify the Prince William Sound shrimp pot fishery guideline harvest level, as follows:

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

~~The estimated total allowable harvest for the waters described in 5 AAC 31.210(a) must be more than 110,000 pounds of spot shrimp by round weight before a commercial shrimp pot fishery may be opened.~~ 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. The department will, to the extent practicable, manage the fishery to allow no more than 50 percent of the guideline harvest level to be taken from any one statistical area. The commissioner will open and close fishing seasons by emergency order, during which pot limits, time, or area may be adjusted to achieve the 50 percent statistical area harvest target.

**What is the issue you would like the board to address and why?** Currently, the total allowable harvest (TAH) must exceed 110,000 lbs in order for the commercial fishery to open, but the recreational fishery is prosecuted at all levels of the TAH. The Sustainable Salmon Fisheries Policy offers a good template for all fisheries with multiple user groups when it states " the burden of conservation shall be shared among all fisheries in close proportion to each fisheries' respective use". This is easily achieved withing the directed shrimp fisheries by merely maintaining the same allocation levels at all TAH levels. If there are available surplus shrimp for harvest, then the commercial fishery should be able to harvest their share of them. Management in the commercial fishery is extremely precise and has a very good track record of managing to their guideline harvest level (GHL). There is no reason why in times of low abundance a smaller more restricted fishery could not take place to harvest the commercial share of the TAH.

The commercial shrimp fishery in Prince William Sound (PWS) is a very unique entry level small boat fishery, and a majority of harvesters direct market their shrimp or otherwise move them through non traditional value added markets. Very few are sold to large scale processors. It would

be extremely damaging to these market streams to have a closed season with zero product available. Being able to offer limited supply to markets during a reduced GHL season in times of lower abundance would be very valuable.

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. Consequently, 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 management 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 contents of this proposal 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-F24-074)

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**PROPOSAL 304**

**5 AAC 55.055 Prince William Sound Noncommercial Shrimp Fishery Management Plan, 5 AAC 55.022 General Provisions for Seasons, Bag, Possession, and Size Limits, and Methods and Means for the Prince William Sound Area, 5 AAC 31.210 Shrimp Pot Fishing Seasons for Registration Area E.**

Delay the season opening by two weeks in the noncommercial and commercial shrimp fisheries, as follows:

A delayed opening of two weeks would bring the percentage of egg-bearing shrimp to the target 5% ratio. This would allow more shrimp eggs to be released, enhance recruitment and increase brood stock, thereby improving the shrimp fishery. This opening date would apply to all user groups to avoid the harvest of egg bearing shrimp. To achieve this, open all pot shrimp fisheries in Prince William Sound on May 1st by regulation.

**5 AAC 55.055(a)(3)(A)** only from **May 1st** [APRIL 15] through September 15;

**5 AAC 55.022(b)(5)(A)** may be taken from **May 1st** [APRIL 15] - September 15;

**5 AAC 31.210(a)** ..., shrimp may be taken from **May 1st** [APRIL 15] through September 15,

**What is the issue you would like the board to address and why?** The current regulatory shrimp season opening date of April 15 allows a significant number of egg-bearing females to be harvested early in the season. This practice may be a significant contributor to the current declines of PWS spot shrimp numbers.

Field observations show a high percentage of egg-bearing shrimp are caught early in the season and late in the season. The data shows a significant harvest of egg-bearing shrimp in the beginning

of the season that exceeds the desired levels. A two-week delay will bring this number down to a target level of less than 5% ratio, as a suggested guideline. Supporting this proposal will create an increased shrimp spawn release before the shrimp fishing season opens by regulation. This provides increased biomass of shrimp over time by not harvesting the spawning females.

Without implementing this change, there will be continued harvest of egg-bearing female shrimp, thereby reducing the amount of shrimp that would ever be able to be harvested.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** ShrimpPros Association members have worked independently and with Department of Fish and Game staff to verify the sampling methods, collect samples and compile data about the number of egg-bearing shrimp that are being harvested. As long term participants in this fishery, ShrimpPros has taken a leadership role and supports regulatory protection for this resource by working with ADF&G staff, and other stakeholders, encouraging changes that demonstrate good resource stewardship and conservation.

**PROPOSED BY:** ShrimpPros Association

(HQ-F24-050)

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