

Brett Wilbanks
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RE: Proposal 248

Honorable Chariman Kluberton and Board of Fish Members,

I submit the following information for your consideration for the Prince William Sound spot shrimp fishery:

- I commercial fish for our regional community of close to 400,000 people
- Of those people, approximately 3100 fish shrimp for themselves with a Department issued sport, personal use, or subsistence permit
- These users claim 60% of the bounty, but represent less than 1% of the local population
- New gallon to pounds formula puts sport, personal use and subsistence harvest at a 5 year average of 117% of GHL (ADF&G study, Maria Wessel, Commercial Fisheries Biologist, ADF&G, Cordova; unpublished data; ADFG rir.2a.2015.01.pdf, Table 245-2.-PWS noncommercial pot shrimp permit information)
- Sport and personal use shrimpers have over harvested 3 of the last 5 years (ADFG rir.2a.2015.01.pdf, Table 245-2.-PWS noncommercial pot shrimp permit information)
- Statistical areas not open to commercial fishing in Whittier and Valdez accounted for 69% of all non-commercial harvest, compared to current limits of 25% GHL from any stat area for commercial operators (ADF&G department data; SP15-03-1.pdf, pg 19)
- Out of 3100 sport, personal use and subsistence permits, up to 20% do not turn in their permits with requisite harvest record. They are allowed to fish the following year.
- Department considers information to be 86% accurate, which is an estimate; there are no field checks mid-season or data to support this assertion
- Department believes estimating the sport, personal use, and subsistence take is good enough, but must have highly accurate, daily information for less than half of the fishery (ADF&G Proposal 257, I support this one in the best interests of the fishery)

Here is Department data for the total spot shrimp harvest in PWS after the corrected gallons to pounds conversions are applied:

TAH	Actual Total Harvest	non-comm GHL	Non-comm pounds	#pots	% of GHL	comm GHL	comm pounds	% of GHL	
2009			90961	5					
2010	137500	187495	82500	142146	8	172	55000	45349	82
2011	131900	148618	79140	95924	5	121	52760	52694	100
2012	128100	111946	76860	90385	5	118	51240	21561	42
2013	165750	147632	99450	85988	5	86	66300	61644	93
2014	166500	157619	99900	89155	5	89	66600	68464	103

The Department says they can use the EO process to make adjustments, but they have nothing to back these actions up. The Department did not act in-season in the past to prevent this over harvest. Catch reporting would provide the data to make those kinds of management decisions, instead of speculation, guesswork and waiting until the following season.

ADFG proposes even more stringent reporting by commercial operators for 40% of the TAH, but states that it would be too difficult and cost prohibitive to have 60% of the catch reported in a timely manner. The Department also state that a technician enters in non-commercial permit data and harvest information when the permits are returned.

- Technically, the amount of data entered is the same, just done over the season instead of at the end of the season
- New options for others to enter the data over the Internet, therefore saving data entry costs
- Allows enforcement of harvest recording on the permit as required by regulation, which otherwise is unenforceable
- Earlier Department estimate errors show flaws in the guessing method
- Unable to react to any environmental, participation or habitat issues
- Threatens sustainability due to continued risk of over-harvest by non-commercial users
- Threatens economic impact by allowing non-commercial over-harvest; potentially closing commercial fishery and access by 99% of the public

Department recognizes need for sport and personal use reporting, as evidenced in their proposal for SE spot shrimp in 11A; requiring harvest information be recorded in response to the collapse of the fishery in that section. This is another good example of slow management reaction due to inaccurate harvest information.

The largest objection by the Department in collecting non-commercial harvest data is the impact of the cost of entering data or the expense of postage stamps to mail in a report. Email or web forms provide a one time cost to develop. Internet access is provided at every public library. The real data is then used for management purposes. If someone can afford to burn fuel to set 5 pots, then they can spend a couple of minutes on their smartphone to enter their catch data.

We did not hire the department to manage 40% of a fishery and guess at the rest. This is evidenced by the board having to take action to reduce the number of sport pots 8 to 5 in 2011. If the Department was managing in-season, then the sport fishermen would not have caught 179% of the GHL in 2010.

If the Board wants to keep people honest, then please SUPPORT proposal 248 to ensure a well managed and sustainable fishery for all users.