

## **PROPOSAL 224**

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

Modify the guideline harvest threshold for the Prince William Sound Area commercial shrimp pot fishery, as follows:

#### **Option A:**

Allow the fishery to continue to be managed for the 60/40 split at lower Total Allowable harvest levels. Thus evenly sharing the burden of conservation between groups. This is my preferred solution. If needed, a smaller number (for example 80,000lbs) could be a trigger point for closure of both fisheries. This is my preferred solution.

#### **Option B:**

Close the fishery entirely for both recreational and commercial fisheries when Total Allowable Harvest is below 110,000 lbs in order to facilitate recovery of the fishery and a return to full fishing for both user groups.

**What is the issue you would like the board to address and why?** Shrimp harvest in Prince William Sound is allocated by the department determining a Total Allowable Harvest and then apportioning on a 60/40 split between the Recreation/Commercial fisheries. However in the case where the TAH is estimated to be less than 110,000 pounds than there is no commercial fishery at all and the entire fishery is allocated to the recreational sector. This is an issue in several ways.

1) This is not an equitable sharing of the burden of conservation. In fact it is not a sharing at all. One user group bears the entirety of it. Furthermore the burden of conservation is supposed between allocative groups in proportion to the groups impact on the resource and in this case the group that has at MOST 40% (in fact lower) of the total harvest is bearing 100% of the burden. In fact in times of conservation this effectively RAISES the allowable harvest for one user group while eliminating all opportunity for the other.

2) This denies access to the resource in years of lower abundance to thousands of Alaskans. This is not a staple food source "fill your freezer" sort of personal use fishery. It is a fairly exclusive, expensive to participate recreational fishery. The vast majority of the commercial harvest is sold in state largely through small direct market operations, and the commercial fishery is the only access most of the population has to this amazing product.

3) In years of low abundance it denies crucial population data to the department. In contrast to the recreational fishery which has significant issues with post-season reporting and a lack of direct management, the commercial fishery is strictly regulated with extensive in-season reporting and logbook requirements. There is not issues with going over harvest quotas in the commercial fishery and it provides a very good indice as to the health of the resource.

Finally, it is worth pointing out that this has not come in to effect in the 7 years the fishery has operated since its re-opening, but it was almost an issue in 2016 and seems appropriate to address it before it actual occurs since the impact on the small, fragile, commercial fishery would be disastrous.

**PROPOSED BY:** Joseph Person

(EF-F17-119)

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