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Alaska Department of Fish and Game
Boards Support Section – Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Attn: Alaska Board of Fisheries; Statewide Dungeness Crab, Shrimp, & Miscellaneous Shellfish: March 6-9, 2018

RE: Proposal 225

Given the historical commercial harvest, the current allocation of 60% TAH for non-commercial users represents a significant allocative impact. This allocative matter was not evaluated by the Board at the 2009 Statewide Shellfish Meeting cycle. The statutory allocation criteria does not appear to have been fully applied as outlined in AS 16.05.251(e),

(e) The Board of Fisheries may allocate fishery resources among personal use, sport, guided sport, and commercial fisheries. The board shall adopt criteria for the allocation of fishery resources and shall use the criteria as appropriate to particular allocation decisions. The criteria may include factors such as

(1) the history of each personal use, sport, guided sport, and commercial fishery;

Commercial fishing pot shrimp has a longer documented history in PWS than sport use; see PC-15. Historically, pre-2000, non-commercial use was characterized as 5% or less of the total participation.

(2) the number of residents and nonresidents who have participated in each fishery in the past and the number of residents and nonresidents who can reasonably be expected to participate in the future;

Consistently, there has been 2100 non-commercial participants on average over the last decade. Consistent participation during pot limit adjustments show no detrimental effect of reducing non-commercial gear amounts. There will still be participation with a reallocation and reduced pot numbers, as we have seen in the past.

(3) the importance of each fishery for providing residents the opportunity to obtain fish for personal and family consumption;

Commercial harvest represents the ONLY method for the majority of consumers of PWS spot shrimp. Many other species exist in the sound and represent a larger mass of available protein to the sport angler, so shrimp currently represents a small portion of food available to the sport angler, relative to fin-fish.

(4) the availability of alternative fisheries resources;

Non-commercial users can also sport fish for a variety of other species to eat; there are also other pot fishing opportunities in the sound for crab and octopus.

(5) the importance of each fishery to the economy of the state;

This local, small boat commercial fishery contributes significantly to the state economy, provides fresh shrimp to 5X more people than participate individually non-commercially. This fresh product is documented to reach far into the Alaskan interior, onto the tables of residents across the state.

(6) the importance of each fishery to the economy of the region and local area in which the fishery is located;

Small commercial operators trying to make this fishery work need product to bring to market to meet a healthy demand. Availability of shrimp directly affects the economic impact to these many small operations. Provisioning, fuel, bait, gear, maintenance, moorage, insurance, crew wages, and investments in equipment all directly contribute to the local economy in a significant way.

(7) the importance of each fishery in providing recreational opportunities for residents and nonresidents.

Allocation adjustments will not prevent non-commercial participation. The opportunity to fish for spot shrimp remains. Also, commercial exclusion zones near major ports remain, and ensures exclusive access for non-commercial users.

