## **PROPOSAL 240**

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

Modify PWS shrimp pot harvest strategy from a static split, between noncommercial and commercial, to a tiered percentage depending on the total allowable harvest level (TAH), as follows:

I propose a system of three tiers for allocating the guideline harvest level.

- At a total allowable harvest (TAH) of less than 110,000 lbs, the commercial fishery is limited to 30% of the total harvest.
- At a TAH between 110,000 and 200,000 lbs, the commercial fishery is limited to 40% of the total harvest.
- At a TAH greater than 200,000 lbs, the commercial fishery is limited to 50% of the total harvest.

What is the issue you would like the board to address and why? The current guideline harvest level (GHL) for the commercial fishery is allocated to be 40% of the total allowable harvest and has a minimum threshold of 110,000 lbs for the commercial fishery to occur. This has worked out reasonably well and the commercial fishery has always been managed to its goals in the years since the reinstatement of the fishery in 2010. The same cannot be said of the sport fishery which has repeatedly gone over its share of the GHL. My primary problem with this arrangement is the fact that the entire burden of conservation is placed on the commercial fishery in times of low abundance. In fact, a low total allowable harvest (below 110,000 lbs) results in the full closure of the commercial fishery, and essentially no restriction on the recreational fishery which is the greater percentage of the harvest. This is not in accordance with general policy of spreading the impacts of restrictions in proportion with a user groups impact on the resource. The commercial fishery is a very small fishery and a large portion of the harvest is direct marketed or sold to small local processors. One season of total closure and inability to get any product at all would severely disrupt these markets. I would really like to see the board address this imbalance, share the burden of conservation equally between user groups, and allow for some small level of harvest for the commercial sector in times of low abundance in order to provide for economic sustainability of the fishery.

My proposed solution would do this (while still causing the commercial fleet to bear a higher share of the burden of conservation) and maintain the status quo in almost all reasonably expected situations while allowing for the possibility of allowing the commercial fleet to harvest surplus shrimp in the event that populations ever drastically increased. It is worth pointing out that this proposal would have literally had no effect on any season since the commercial fishery was reinstated it is merely an attempt to formulate a better plan for potential changes in TAH in the future.