PROPOSAL 215

5 AAC 38.142 (h). Southeastern Alaska Geoduck Fishery Management Plan.

Give the department the authority to experiment with reduced guideline harvest levels in sea otter impacted areas where the current biomass estimate is less than 30 percent of the original biomass estimate.

At the end of 5AAC 38.142(h) added:

As part of a pilot project, the commissioner may allow the department to use a current biomass estimate to create a new GHL to allow for reduced harvest in sea otter impacted areas. The pilot project will be closely monitored to determine if harvest and sea otter predation are sustainable for the geoduck biomass.

The commissioner may not open the commercial geoduck fishery in an area if the estimated biomass of the geoduck stock in that area is less than 30 percent of the original biomass determined by the first stock assessment conducted by the department on that stock. The commissioner may modify this percentage if the department receives information about geoduck productivity that supports a modification.

What is the issue you would like the board to address and why? The management plan for geoduck clams has remained unchanged since the inception of the fishery. The fishery itself has changed dramatically and not in positive ways. In the past several years, the fishery has had a steady decline in its GHL and has had several areas closed to commercial fishing all together. In the 2024-2025 fishing season, for example, we will have the smallest annual GHL in over a decade. Geoducks have become increasingly valuable with an ex-vessel value of over $10/pound in the 2023-2024 season. Approximately 55 CFEC limited entry permit holders participate in the fishery. The losses in this fishery are occurring only in areas where there are sea otters present. In areas without sea otters, GHLs are actually increasing when they are re-surveyed. Otters are moving into these areas and if similar trends happen in inside waters, we will lose the geoduck fishery all together.

In 5 AAC 38.142 (h) it states: The commissioner may not open the commercial geoduck fishery in an area if the estimated biomass of the geoduck stock in that area is less than 30 percent of the original biomass determined by the first stock assessment conducted by the department on that stock. The commissioner may modify this percentage if the department receives information about geoduck productivity that supports a modification.

We believe this original biomass threshold is erroneous in ecosystems drastically changed over the past few decades. ADFG itself uses various biomass estimates based on changes in the fishing areas or new data derived from logbooks. The original biomass estimate therefore changes in ADFG application as conditions change; we would like to see this change to address significant loss of access to fishing grounds due to sea otters.

There is precedence for using a current biomass estimate in areas impacted by otters. In British Columbia, in areas impacted by otters, the commercial dive industry and the Canadian Department of Fisheries and Oceans are collaborating on an altered management plan that replaces the original

biomass estimate with a current biomass estimate. In a few areas they have been doing this for several years and have data that indicates a balance between harvest and sea otter pressure. We would like to work with ADFG in 2-3 areas recently closed to commercial harvest to determine if this approach would allow a reduced level of harvest in the presence of otter predation pressure. SARDFA will work cooperatively with ADFG and support more frequent biological assessments to ensure stocks are healthy.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. This proposal was developed by the Southeast Alaska Regional Dive Fisheries Association after several meetings with our commercial counterpart in British Columbia, the Underwater Harvester's Association.

PROPOSED BY: Southeast Alaska Regional Dive Fisheries Association (HQ-F24-092)

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