PROPOSAL 308

5 AAC 31.223. Lawful shrimp pot gear for Registration Area E.

Reduce the total number of shrimp pots allowed in the Prince William Sound shrimp pot fishery, as follows:

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- (e) Shrimp pots may only be operated as follows:
- (1) the department will announce annually, before the opening of the commercial shrimp pot fishery season, the number of shrimp pots that may be operated from a vessel in the commercial shrimp pot fishery for that season, not to exceed [100] **25** shrimp pots per vessel; in determining the annual pot limit, the department will consider the

What is the issue you would like the board to address and why? Currently vessel pot limits in the Prince William Sound commercial shrimp fishery management plan are set to a maxium of 100 pots per vessel. This is a small fishery in a relatively restricted fishing area with very high levels of participation. Department managers have never set a pot limit over 60 pots and we have not had a pot limit of over 40 pots since 2015. In three of the last 5 years we have had a pot limit of 25 pots and the fishery prosecuted quite successfully. Despite the lower pot limits, during the first opening when up to 60+ vessels participate, it feels like there are shrimp pots at every conceivable place you might think to set a shrimp pot. It is often very crouded and complaints about gear conflict are quite common. In areas 1 and 2 the commercial fishery overlaps heavily with the recreational fishery and there are even more pots in the water. Smaller pot limits requiring more targeted fishing are workable in this fishery, and small pot limits allow the department to more precisely target the GHL as potential volatility in harvest levels is greatly reduced. It goes without saying that higher pot limits also would lead to more lost gear and bottom impacts from pots which is unnecessary in a fishery with a remarkably low social and environmental impact. In general, I think that this fishery has found a heatlthy, unique, niche as a low barrier to entry introductory fishery. Slower paced fishing more amenable to direct marketing practices has greatly increased the per pound value by over double relative to other spot prawn fisheries elsewhere in the state. Management practices over the last few years have worked very well, the fishery has thrived, and multiple participants have developed business models working within its unique constraints and still maintaining profitability. I think that moving the regulatory maximum pot limit to numbers more in line with the limits actually used in the modern day fishery is warranted. The current unrealistic maximum pot limit in regulation leads to unknown expectations on gear requirements to participate in the fishery as the first announcement setting pot limits comes out very shortly before the fishery begans. Furthermore the unrealisticly high maximum pot limit set in regulations contributes to disruptive efforts to 'over commercialize' and disrupt the orderly operation of this fishery and the unique, high value, low impact advantages that it has by repeated requests from some sectors of the fishery to allow much higher pot limits. I think the BoF should make clear and confirm the unique role this fishery has in the greater overall fisheries eco-system as a low barrier to entry, small boat, low pot limit, direct market fishery.

In general, this fishery is currently in a state of flux and there is a lot of uncertainty surrounding many aspects of it. I have participated extensively in this fishery since its reopening in 2010 and have been heavily involved with the board of fish process regarding the current management plan. This proposal is part of a suite of proposals in which I attempt to anticipate potential issues that

exist currently, may arise during the 2024 season or ongoing CFEC process regarding potential limited entry for this fishery, continued uncertainty from the department regarding the current survey and biometric surplus population model, and narratives coming into the 2025 regulatory meeting. I feel that there is significant likelihood of the need to review and adapt much of the current regulatory plan and am submitting proposals concerning several aspects of the plan in order to foster discussion, and serve as a starting point if the need for serious revision of the plan is thought necessary.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain. I have discussed the management of this shrimp fishery with multiple ACs, other participants in both the recreational and commercial fisheries, and ADFG staff many times and will continue to do so leading up to the 2025 meeting.

PROPOSED BY: Joseph Person	(EF-F24-072)
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