

***SUBSISTENCE SHELLFISH, COMMERCIAL AND SPORT SHRIMP, COMMERCIAL AND SPORT OTHER MISCELLANEOUS SHELLFISH (21 proposals)***

***Geoduck clam***

**PROPOSAL 212**

**5 AAC 38.142 Southeastern Alaska Geoduck Fishery Management Plan.**

Allow the number of geoduck permit holders able to fish from one vessel to be increased from two to four by emergency order.

**Add the following language to 5 AAC 38.142 (p)**

***The commissioner may by emergency order modify the number of CFEC geoduck permit holders able to be onboard or fish from a registered vessel to four divers when the total area trip limit is four hundred pounds or less.***

**What is the issue you would like the board to address and why?** In the geoduck clam fishery only 2 divers can fish from one vessel (5 AAC 38.142 (p)). However, it is often difficult to harvest the GHF in remote areas when the remaining GHF is small. It is not cost-effective to travel long distances for a limited harvest. We would like to have up to four CFEC geoduck permit holders conduct fishing operations from a vessel that is registered to commercially fish for geoducks to make it more economical to harvest the remaining GHF. This would be done when an area has a trip limited harvest of 400 or less pounds per dive harvester.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** Insert the issue statement here.

**PROPOSED BY:** Southeast Alaska Regional Dive Fisheries Association (HQ-F24-086)

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**PROPOSAL 213**

**5 AAC 38.142. Southeastern Alaska Geoduck Fishery Management Plan.**

Modify how geoduck guideline harvest levels are calculated.

**5 AAC 38.142 Southeastern Alaska Geoduck Fishery Management Plan. (g)** The guideline harvest level for each area will be calculated as two percent of the most recent estimated biomass, **using the mid-point of the one-sided 90 percent confidence interval**, per year.

**What is the issue you would like the board to address and why?** The Southeast Alaska Regional Dive Fisheries Association (SARDFA) would like to have ADF&G establish the Guideline Harvest Level for the geoduck clam fishery using the mid-point of the one-sided 90 percent confidence interval based on their assessment surveys. This would allow for a higher GHF while maintaining a conservatively managed fishery.

- What would happen if nothing is changed?

There would remain annual confusion as to whether ADF&G is managing for the lower end of the confidence level or the mid-point. Also, in commercial areas where there is not significant sea otter predation, whenever these areas are re-surveyed, the GHF has increased. We believe using

the lower bound of the one-sided 90% confidence interval is overly conservative and using the mid-point would enable fuller utilization of the resource while still adequately conserving the geoduck stock.

- What are other solutions you considered? Why did you reject them?

It is possible to discuss on an annual basis the department's management goal, however SARDFA believes this would eliminate any confusion on how the fishery is being managed.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** The SARDFA geoduck committee which is comprised of 20 CFEC permit holders worked on developing this proposal.

**PROPOSED BY:** Southeast Alaska Regional Fisheries Association (HQ-F24-087)

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**PROPOSAL 214**

**5 AAC 38.142 Southeastern Alaska Geoduck Management Plan.**

Allow for areas that have been closed for 5 years as a result of the estimated geoduck biomass dropping below 30% of the original biomass estimate to be resurveyed and potentially reopened.

At the end of paragraph (h) of 5AAC 38.142 add:

**Once an area is closed for a period of 5 years due to exceeding the 30% threshold of the original biomass estimate, the Commissioner may direct the department to conduct a stock assessment and determine a new biomass estimate on which to base a new GHL for a resumption of fishing.**

**What is the issue you would like the board to address and why?** Under the current geoduck management plan once a commercial harvest area's population estimate goes below the 30% threshold of the original biomass estimate, the area is closed to commercial harvesting. Given significant ecosystem changes, it is very difficult to reopen areas once they meet this threshold. In many areas being closed, it does not mean overfishing has occurred; rather it is a reflection of environmental changes since the original biomass estimate was conducted. In these areas, use of an original biomass estimate is not reflective of current conditions. As a reference, in areas without drastic environmental changes, geoduck biomass and GHL have increased on re-survey.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** This proposal was developed in conjunction with the Southeast Alaska Regional Dive Fisheries Association geoduck committee, which is comprised of 20 CFEC geoduck permit holders.

**PROPOSED BY:** Southeast Alaska Regional Dive Fisheries Association (HQ-F24-088)

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**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. SARDFFA 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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**PROPOSAL 216**

**5 AAC 38.142. Southeastern Alaska Geoduck Fishery Management Plan.**

Clarify that only aquatic farm sites approved for the culture of geoduck clams are closed to commercial harvest of geoduck clams.

If (l) 4 were changed to read:

waters identified as a permitted mariculture site **for culture of geoduck;**  
that would correct the issue.

**What is the issue you would like the board to address and why?** (l) 4: waters identified as a mariculture site.

In the geoduck management plan section l defines areas closed to the commercial taking of geoducks. Number 4 indicates all mariculture sites are closed to geoduck fishing but this is incorrect; it is only mariculture sites approved for geoduck cultivation that this applies to

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** In coordination with ADFG Ketchikan and ADFG permit coordinator and SARDFFA geoduck committee.

**PROPOSED BY:** Southeast Alaska Regional Dive Fisheries Association (HQ-F24-091)

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