

Gordon Scott

March 17, 2015

Board of Fisheries

Re: Proposal 254

Re: PWS Commercial Shrimp

Recommendation: SUPPORT

Chairman Kluberton and Fish Board Members

In 2012, the BOF limited commercial shrimp harvest in a single stat area to less than 25% of the commercial GHL. Because the commercial fishery is carried out in different areas on a three year cycle, the effect of this 25% cap is that the commercial fishery is now regulated to harvest no more than an average of 8 1/3% of their total GHL's from any stat area in a full 3 year cycle.

This cap as written should continue to be a law if there is a biological reason to limit the shrimp harvest to less than an average of 8 1/3% annually from any particular stat area. However the data, combined with fairly stabilized CPUE's, seem to support that certain stat areas can sustainably produce far more than what the 25% commercial cap every third year allows the commercial fishermen to produce. This is because these few very productive areas in PWS are the areas that have strong populations of shrimp and the habitat that nurtures good reproduction and survival rates.

In effect, this 25% per stat area limit has precluded the commercial fishermen from utilizing their allotted GHL, because once forced out of the only productive areas, they have not been able to finish catching enough shrimp in areas that do not contain significant populations and habitat.

In order to show the productiveness of a few stat areas, we must take a look at the total resource catches from Prince William Sound.

By looking at Figure 1 on the next page, which shows the average combined commercial and non-commercial harvest from all PWS stat areas over a three year cycle, we can see that harvest from four stat areas has been consistently over the 25% level, while the majority of stat areas produce far less to none. The proposal to increase the commercial per stat area limit to 50% places that limit near the harvest level for 3 of those stat areas, with only one stat area showing overage above that effective 50% of GHL level.

Figure 2 on the next page shows the comparison of how changing the commercial cap to 50% would change stat area overages (using catches from the past 5 years). They would be reduced by about 75%. And the commercial stat area overages would be virtually eliminated.

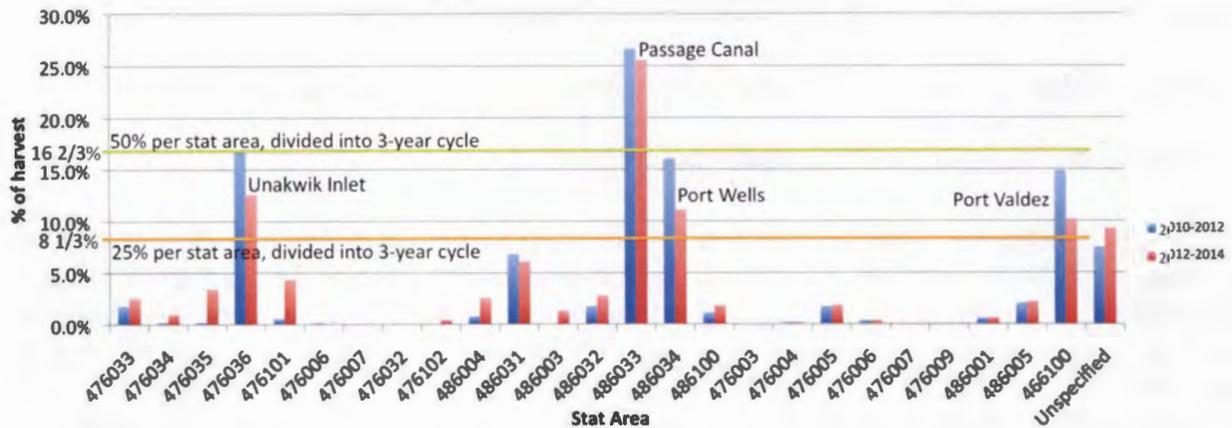


Figure 1. Stat area distribution of average combined commercial and non-commercial shrimp harvest from three-year cycles 2010-12 and 2012-14.

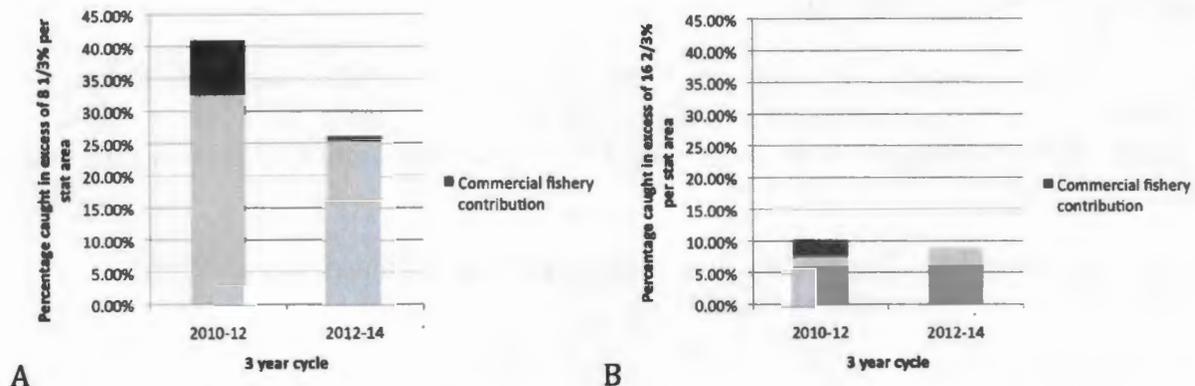


Figure 2. Percent of combined commercial and non-commercial shrimp harvest over a three-year cycle that was taken in excess of 8 1/3 percent per stat area (which depicts commercial and non-commercial resource effects equally). At the top of each column, the contribution of the commercial fishery to the total is highlighted in black. Figure A) shows the total PWS overage given current cap: 25% commercial GHL cap per stat area. Figure B) shows the total PWS overage as proposed: 50% commercial GHL cap per stat area

Notes:

1. All catch figures are from ADFG Data.
2. Non-commercial catch reporting data is not as well defined as commercial data as to exactly what stat area it is from. (Some stat areas are combined.)
3. All catch data is by stat area, and some of the catch data in commercially open stat areas is non-commercial catch.
4. CPUE's have been fairly stable in recent years in commercial and non-commercial fisheries (demonstrated in ADFG documents)

Thank you for the opportunity to comment.
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