

Record Comment Regarding District 13 Subsistence Shrimp Fishery

I have some concerns regarding the proposed changes to subsistence shrimp regulations in the Sitka area.

- 1) Under AS 16.05.258(b)(3), all other consumptive uses need to be eliminated from an area where the shrimp stocks are so limited as to make it is necessary to meaningfully restrict the ability of households to meet their subsistence needs.
- 2) The impetus for these changes is due to concerns in the Hoonah Sound area. Hoonah Sound is 40-some miles each way from Sitka. At 2 miles/gallon and \$3.70/gallon, that's a \$150 round trip. Historically, the shrimping in that area has been good enough to justify this expenditure. If a restrictive bag limit is imposed, it won't be worth the gas money and the subsistence effort may be re-directed to smaller more vulnerable stocks closer to town.
- 3) In the absence of an officially recognized Amount Necessary for Subsistence for the community of Sitka, I propose that the Amount that individual households find to be Necessary for Subsistence be substituted. The objective of management of a subsistence fishery should be to allow as many households as possible a reasonable opportunity to meet their personal Amounts Necessary for Subsistence. This is quite different from managing a sport fishery where there is significant value is allowing a mere opportunity for access. Hence, restrictive bag and possession limits make sense in a sport fishery, but a subsistence fishery – particularly one that takes place \$150 away from the community that uses it should instead have just an annual limit. What advantage is served by requiring subsistence user to make multiple trips? It is not a reasonable opportunity if it requires making multiple expensive trips.
- 4) Sitka has about 3,500 households (according to Wikipedia). Per RC 044, in 2013 they averaged a harvest of 11.0 gallons each, for a total of 38,500 gallons. However, also per RC044, only 17.9% of Sitka households actually harvested any shrimp. This is means that the 38,500 gallons were taken by only 626 households. That means that **those that harvested, took an average of 60 gallons** each. Thus an annual limit as high as 40-60 gallons would meaningfully reduce the total harvest.
- 5) To require that an average shrimper harvest their 60 gallons in twelve trips to Hoonah Sound of no more than 5 gallons each **would cost them \$1,800 in fuel alone**. This cost is not compatible with a subsistence activity.

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e) Regard less of what sort of limit is imposed, please provide a mechanism for adjusting it as soon as often as better data is available.