

Gordon Scott

March 17, 2015 Board of Fisheries

RC 018

Re: Proposal 245 & 249

Re: PWS Non-Commercial Shrimp

Recommendations: OPPOSE Proposal 249

OPPOSE the portion of 245 suggesting taking a subsistence allocation out first.

SUPPORT reducing the allocation percentage of the non-commercial fishery

Chairman Kluberton and Fish Board Members

Proposal 245 asks the Board to revisit the sport fish allocation in the PWS Shrimp fishery.

It suggests that the subsistence determination be taken out first, and then the allocation be applied between the commercial and non-commercial fisheries.

The facts are that the subsistence fishery is already by design included in the non-commercial fishery. When the latest management plan was approved in 2009, this was taken into account and included.

Also, subsistence is meant for local residents. And there are commercial fishery closed areas near populations and towns in Prince William Sound. These are the areas where subsistence fishing customarily takes place, and now takes place only in completion with the other non-commercial fisheries. Traveling to far away places with great cost to subsist is not really in the spirit of subsistence. The subsistence aspects of shrimp fishing were taken into account by establishing these commercial closed areas near communities.

The proposal also requests revisiting the allocation percentage between the non-commercial fisheries and the commercial fishery. This is currently set at 60% non-commercial to 40% commercial.

PWS shrimp, as all renewable resources in Alaska, belong to all Alaskans. Recently there have been approximately 3,000 household permits for this fishery given out annually. The latest census figures for Alaska show there are about 245,000 households in Alaska.

The prior history of this fishery in the 80's shows the non-commercial catch at about 5%, and the commercial catch of 95%. Then the commercial fishery was closed for 19 years after the Exxon Valdez. In response to Proposal 312 in the 2006 BOF Meetings to open an experimental commercial shrimp fishery in PWS, the Dept of law ruled that "Experimental fisheries are allowed by regulation for resource or use of gear types that have not been developed." And the BOF determined that this resource and fishery did not fit for an experimental fishery, because it was already developed. When the commercial fishery management plan (and the first non-commercial fishery plan) was approved in 2009, this was not a NEW fishery. It was just re-opened, with a new management plan.

The 40/60 allocation split does not fairly represent that this resource is available to all Alaskans. Now 1.2% of Alaskans (all who own or have access to boats) have access to 60% of the resource. While 98.8% of Alaskans have access to 40% of the resource through commercial operators. There are MANY Alaskans who rely on commercial fishers to provide their shrimp (and other seafood). These people do not have access, nor the desire to pursue directly the resource that they deserve by being Alaskans, except via commercial fishermen bringing the resource to them.

The 40/60 split is unprecedented in fishery allocations, by a very large exaggeration. For instance, according to a NOAA website, the 2015 allocation for halibut is about 17% for charters, and 83% for commercial in Alaska.

Please return the allocation largely to the commercial shrimp fishery and to most Alaskans, while still leaving plenty of opportunity for the non-commercial fishermen. They already get to fish exclusively 2 of the most productive areas in Prince William Sound which leaves the non-commercial fishermen ample opportunity to catch shrimp.

Thank you for the opportunity to comment, and for your consideration.
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