



Southeast Alaska Fishermen's Alliance

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July 1, 2022

Alaska Board of Fisheries, Board Support

Alaska Department of Fish & Game

PO Box 115526

Juneau, AK 99811

RE: Emergency Petition to repeal an action taken at the Board of Fish meeting to change the Start date of the Southeast Pot Shrimp fishery (P91A)

Board Support & Board of Fish Members,

We are asking the Board of Fish to convene an emergency meeting to address this emergency petition to repeal the action taken at the Board of Fish meeting changing the Southeast Pot Shrimp fishery historical October 1 season start date to the spring (May 15), thus creating a loss of harvest opportunity and an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded in 2022. Such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future and income from this fishery would be lost. For many of the active pot shrimp fishermen (>50% latency), this is the backbone to their income, surpassing gillnet salmon in importance.

This proposal was not submitted by ADF&G as a management or conservation concern, the proposal to change seasons has previously been submitted pretty much every cycle and not seriously considered. Industry did not weigh in as they might have in the confusion of the meeting delays and location due to COVID. This change is particularly burdensome because no one expected a space of 1-1/2 years between opportunities for a commercial harvest and income opportunity. This is one aspect that didn't come up until deliberations. During deliberations addressing cost, it was stated that there would not be any additional cost to the individual to participate. Board members never mentioned that the cost to the industry is the loss of a \$2.5million dollar fishery that is

mostly executed by SE resident permit holders and the impact of this loss on local communities. Southeast community residents hold 88.5% of the fishable permits.

The loss of the October fishery will also impact long term established markets that has been developed painstakingly over the past 30 plus years based on a superior quality product. As a result of this action, this market will be lost to the Alaska fleet and our Alaskan product will directly compete with the BC catch. If the markets and quality were not better in the fall why was the fishery mostly conducted in the fall even when the fishery was still open in May. The table 3.3 (page 46-47) in the [Fishery Management Report No 21-32](#)¹ reflects harvest since the 1970/71 season where the fishery was being conducted year-round. If this change does not affect harvest and the market value, that report would have shown more harvest in the spring/summer months and not the Oct – Dec time period where the majority of the harvest has occurred since 1983/84. All this while the number of permits was significantly increasing.

The Board of Fish deliberated on Proposals #171-174 to change the season date at the March 10-22, 2022 meeting in Anchorage. While proposals to change the season date have been considered at every Board of Fish meeting since limited entry, ADF&G has never submitted the proposal to change the season date based on conservation or sustainability of the resource. The department would have initiated this action if they did not believe the fishery was sustainable as currently managed. It was only in the 2018 and 2022 Board of Fish meetings that the ADF&G research division supported a proposal, not initiated by them, to change the season date based on the assumption and supposition that a change in season dates may benefit the stock. At all other previous Board meetings ADF&G **OPPOSED changing the season date to the spring based on biological considerations**. At the 2000 Board of Fish meeting the Dept stated, Biologically, the summer harvest would disrupt spot shrimp during the egg-hatch, molt and growth phase of its life history. In the [Fishery Management Report No 21-32](#)² page 33 it states as part of the Regulation Development background, *“During the 1982/83 season, fishing was not allowed during May and June in Districts 1 through 8. **This closure was intended to protect fecund, female shrimp from exploitation during the egg-hatch period to maximize stock reproduction potential.** The actual range of the egg-hatch period probably varies by location throughout the region but likely occurs sometime between late February through the middle of May.”* Fishermen who have fished the spring believe the hatch extends until the end of May. The

¹ Southeast Alaska Region Shrimp Fisheries Management Report through 2019/20 Season by Quinn Smith and Joseph Stratman – Written Board of Fish Report March 2022

² Smith, Q., and J. Stratman, 2021 Southeast Alaska Region Shrimp fisheries management report through 2019/2020 season. Alaska Department of Fish and Game, Fishery Management Report No. 21-32, Anchorage

Department has been inconsistent in their position recently without any new studies, research or information to inform the change in position.

Information on life cycles is limited, however there are some studies that specifically show different life cycles for Alaska, British Columbia (BC) and Puget Sound. Initial studies were done in 1977 in Puget Sound, 1964 and 1996 in Prince William Sound (PWS). Results of the studies show that spot shrimp in Alaska do not share the same life cycle timing as in Puget Sound and BC. Based on studies performed by ADF&G, the life cycle of the Alaska Spot Prawn differs from that of BC Canada and of Puget Sound.³ Females are not thought to survive long after release of eggs in BC while in Alaska, multiple size classes of female shrimp have been documented during department surveys⁴ thus leading to the conclusion that Spot Shrimp in Alaska reproduce more than once, while Canada bases their fishery on the assumption that they reproduce once.

Management of the spot shrimp fishery resource requires a team effort with information based on various sources. Fisheries research scientists are only one part of a successful formula for management. They collect life cycle, habitat and growth information of the species to better understand the resource and help managers develop criteria to assess stock strength. Fishery managers use this information in concert with catch & survey data and GHLL trends to effectively manage sustainability by building the larger picture. The ultimate responsibility and accountability is on the fisheries manager, not the scientist.

The in-season fisheries manager is best aware of the fleet effort and harvest trends and the long-term health of the stock.

Sources of information managers use and rely on include:

- Catch per unit of effort (CPUE) is one step in calculating the strength of the fishery and is variable based on 1.) time of the year; 2.) Experience of the fisherman; 3.) quality of the bait; and 4.) weather.
- Size at sexual maturity (calculated by carapace length and/or by the number of animals per pound) is another step. This information determines strength of the stock because; as hermaphrodites, stressed populations will become sexually mature at a younger age, i.e at a smaller size.

Currently available data is from the fall fishery of the past 30 years and has been used to sustainably manage the fishery. Detailed data collected for the past decade has been mainly from the October fishery. This database is more complete and comprehensive because of required use and submission of logbooks and in-season sampling by

³Smith, Q., B. Davidson, J. Stratman, G. Woods. 2011. 2012 Report to the Board of Fisheries on Region 1 Shrimp Fisheries, Alaska Department of Fish and Game, Fishery Management Report No 11-56, Anchorage

⁴ Love and Bishop 2005

department personnel. It is not comparable to data from the spring and should not be used to manage a spring fishery. Based on the points above, any data collected with the current change in the harvest timing will not be correlative to data collected to date. Without availability of consistent data, management will be speculative at best. This could cause major disruptions to the fishery due to unknown guess of the meaning of the data or overfishing, again based on unknown comparative data.

The Spot Shrimp fishery is managed mainly by the setting of Guideline Harvest Levels (GHL) which can be increased or decreased. Areas can be closed for sustainability as factors warrant. Other actions taken to maintain the sustainability of the spot shrimp fishery with continued success are:

- implementation of limited entry
- the Shrimp task force which is inactive based on industry's frustration with the Dept's research section for industry perspective and what is being seen on the grounds.
- Log books for Direct Marketers/Catcher Processors
- on site in season sampling
- gathering of size data to determine female size at age
- adjusting the GHL in season as needed and weekly reporting for Direct Marketers.

The action taken by the Board of Fish is detrimental to the fishery and burdensome as it not only undermines management's ability to make decisions based on consistent long-time data series but does this while at the same time increasing the effort. May is an easier time to fish for smaller boats that would otherwise not fish in October likely bringing into play latent permits. The ability to determine if the stock is stressed by comparing egg bearing shrimp sizes year to year in the DM/CP sector will not be available, resulting in a tenuous management strategy. There is no data, only speculation to support any conservation gain in SE Alaska by changing the timing of the fishery.

This is a giant experiment that jeopardizes and has the potential of destroying the fishery. Changing the date of the fishery possibly exacerbates the decline of the fishery as one of the potential reasons for declines are the increasing sport and subsistence harvests, a large factor in removal rate for this fishery. Lummi Fisheries just sent 220 39" heavy shrimp pots to Sitka in March for the sport fishery.

By changing the fishery to May, ADF&G will be short staffed as they are managing other fisheries and conducting assessment programs at that time. They would need more funding to collect data needed to manage the fishery and start a new time series of data to manage the fishery. Without personnel and additional funding, they will be unable to

collect any in season data to help managers determine stock health and the impacts and removal on sustainability. This is a recipe for disaster.

The best managed shrimp fishery with a long record of success is the district 7 fishery where 30% of the fleet fishes. The reason for this success is prudent and fact-based in-season management as a partnership between the fleet and ADF&G.

If changing the fishery season date has that much value and biological importance to the fishery, why didn't ADF&G submit the proposal and why for over 30 years of a sustainably managed fishery did the biologist and Dept oppose changing the season date. If a spring/summer season is so important to the fishermen and the quality of the shrimp is fine, why are more fishermen **not participating** in the spring opening of districts that didn't reach their GHL in the fall.

If the BOF meeting had taken place in Ketchikan as initially scheduled in 2021 rather than in Anchorage, there would have been much more representation from the fishermen that participate in the fishery and more public concern. Also, if it was clearly understood that by changing the date, a full year and a half would pass before the next opportunity to execute the fishery, comments on the proposal might not have been the same.

Please accept this emergency petition to repeal the action taken on proposal #172 to change the spot shrimp season to May 15th.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line extending to the right.

Kathy Hansen
Executive Director