

To: Board of Fisheries concerning SE and Yakutat Shellfish
From: Thomas Harden
Concerning: PROPOSAL 84

Please amend the following regulation to as stated:

5 AAC 31.136. Closed waters in Registration Area A.

Close additional waters in District 2 to commercial pot shrimp fishing, as follows:

(4) Shrimp may not be taken: in the waters of Kasaan Bay north and west of a line from the northern most tip of Daisy Island located at 55°28.816'N lat, 132°19.379'W long. northeast to a point on Kasaan Peninsula located at 55°30.533'N lat, 132°18.191'W, including all waters of Twelve-mile Arm;

Reasoning: Over the years, District 2 commercial shrimp season has caused a continual downward trend to the shrimp biomass in the waters of Kasaan Bay and Twelve-mile arm to a point where the area can no longer support a commercial fishery.

Beginning with the 2009 ADF&G news release, the shrimp guideline harvest limit or otherwise known as the quota, was reduced from 86,000 pound to 65,000 pound of shrimp in District 2. ADF&G stated the reasoning for the reduction of quota was “*due to excessive exploitation rates, declining CPUE, and a decrease in mean carapace length*”.

In the fall of 2010 commercial shrimp quota in District 2, the district was open for 33 days with a quota of 65,000 pounds of shrimp. A total of 68,893 pounds in total was harvested. In 2011, District 2 was opened again for a quota of 65,000 pounds. Commercial shrimp fishermen harvested 75,425 pounds of shrimp in 20 days. In 2012, the shrimp quota remained once again at 65,000 pounds even though the shrimp fishermen had gone excessively over the quota by 16% the previous year. Commercial shrimp fishermen harvested 74,631 pounds of shrimp in District 2 in 15 days. Once again the commercial fishermen went excessively over the quota by 15% in 15 days of fishing. ADF&G once again kept the 2013 shrimp quota at 65,000 pounds for District 2 even though the commercial shrimp fishermen went excessively over the quota the previous two years. Commercial fishermen harvested 62,250 pounds of shrimp in District 2 in 2013

Beginning in the fall of 2014, the commercial shrimp quota for District 2 was reduced to 52,000 pounds of shrimp. By emergency order, ADF&G closed the waters of Kasaan Bay, Twelve-mile Arm, and Skowl Arm after 12 days into the open season. As quoted by the emergency order, “*Kasaan Bay and Skowl Arm (Subdistrict 102-60) is being closed as a conservation measure to protect this localized shrimp stock from additional fishing pressure. Commercial harvest rates have been in decline over the past several years. The pre-season survey the department has conducted over the past four seasons has also shown a precipitous decline in the catch rates of spot shrimp as well as a decline in biological parameters*”. Commercial shrimp fishermen harvested 50,0826 pound of shrimp in District 2 in 2014 and were allowed to fish commercially for 12 days in an area of low biomass which ADF&G was concerned about.

ADF&G has not opened the waters of Kasaan Bay and Twelve-mile Arm since the 2014 shrimp season. District 2 has remained open for the harvest of shrimp with reduced quotas. The quota was set at 42,000 pounds in 2015, and further reduced to 30,000 pounds in 2016. In 2017, District 2 remained at a 30,000 pound quota.

ADF&G began a new pot gear survey in Kasaan Bay beginning pre-season in 2011. This survey has continually shown a sharp decline of the shrimp biomass. In the 2013 shrimp season, ADF&G began asking commercial shrimp fishermen to fill out logbooks of their catch.

The 2013 October commercial shrimp season for District 2 has left the personal use shrimpers with a low shrimp biomass in Kasaan Bay and Twelve-mile Arm. The shrimp biomass has been extremely slow to increase and has not recovered from the decimation. District 2 itself is a large area; however the commercial fishing fleet focused their efforts in the waters of Kasaan Bay and Twelve-mile Arm in 2013 which are adjacent to the communities of Hollis and Kasaan. Both areas were hard to navigate during the fishery from the large amount of commercial gear.

The area used to receive moderate personal use fishing pressure through-out the year from residents of Prince of Wales Island as well as Ketchikan. However, personal use fishermen numbers have declined rapidly because their catch effort compared to the return is very low. Prince of Wales has a large population of subsistence / personal use users who rely on the land and ocean to feed their families. The island has a high cost of living with a financially depressed economy.

This commercial closure of Kasaan Bay and Twelve-mile Arm is a small percentage of District 2 which runs the eastern shores of Prince of Wales Island south of Narrow Point and north of the US/Canadian border. This area includes all waters of bays and sounds on Prince of Wales Island on the eastern shore, south of Narrow Point. The large commercial vessels can easily navigate these areas open to commercial shrimping and away from the communities of Hollis and Kasaan who rely on a subsistence lifestyle to exist. Commercial fishermen focus on making a profit along with commercial seafood processors/companies. They are not concerned if the rural resident personal use fisherman is harvesting enough shrimp to feed their family.

A regulation closure of the area to commercial shrimping would protect a relatively small percentage of District 2 to allow personal use fishermen to utilize the shrimp resource. The area selected for the closure is in close proximity to the community of Hollis and village of Kasaan. Both places have harbors and boat launches which are utilized by all residents of Prince of Wales Island with small vessels. Commercial vessels would still be able to fish District 2 in waters not directly adjacent to the communities of Hollis and Kasaan.

I am requesting that the Board of Fisheries enact this regulation change as wrote to protect the personal use shrimp fishery for the residents of Alaska. I feel it's the duty of the Board of Fisheries to protect the shrimp biomass of Kasaan Bay and Twelve-mile Arm for the residents of Alaska not not just for the betterment of the commercial enterprises.