

December 6, 2021

Melvin Smith, Chairman
Dale Kelley, Commissioner
Commercial Fisheries Entry Commission
PO Box 110302
Juneau AK 99811-0302

RE: Petition for limited entry of Prince William Sound Pot Shrimp fishery; P09E, P91E

Dear Commissioners,

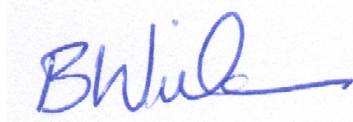
This letter is requesting that the Commercial Fisheries Entry Commission evaluate the Prince William Sound Pot Shrimp fishery for implementation of limited entry permits due to recent increases in participation pressure. We believe this fishery has reached a level of participation that threatens the conservation and the sustained yield management of the fishery resource as well as its economic health and stability.

ShrimpPros Association includes original participants in the Prince William Sound Pot Shrimp Fishery as well as more recent entrants to the fishery and all are concerned for the near term viability of the fishery. These members have reviewed available fishery data and have resolved to support limited entry permits and quota considerations to stabilize the value-added nature of this primarily local small boat fishery.

Pot reductions for the non-commercial participants have caused increased interest in interim-entry permits for this fishery. An inequitable burden of conservation outlined in the management plan also places unreasonable and undue stressors upon this very modest commercial fishery. These factors, along with others, have led to the sudden increase of unintended commercial participation which has exceeded the optimal number of commercial participants.

The most recent level of participation now threatens the economic viability of this primarily direct market fishery. There has been a significant increase of the commercial fleet over the last three years, and 2022 has the potential to be a severe challenge to make the fishery economical for some, risking long developed direct market customers. Long time operators are placed at a disadvantage, as they are the ones who have invested in vessels, gear, and markets. This commercial fishery requires access protections to ensure some level of stability and consistency necessary for its survival and long term market success.

Respectfully,



Brett Wilbanks, Chairman
ShrimpPros Association



Bruce Bowman, Vice Chairman
ShrimpPros Association