

From: [Forest Jenkins](#)
To: [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)
Subject: PWS Shrimp Public Comment
Date: Sunday, July 21, 2024 5:47:03 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Below are my public comments for the potential regulation change and move to limited entry in the PWS Commercial Shrimp fishery.

CFEC Shrimp Pot Fishery Public Comment

My name is Forest Jenkins. I have been an active participant in Alaska commercial fisheries since 2008. I purchased my first CFEC permit in 2014 in the PWS setnet fishery. Ever since, commercial fishing has been my full time job in and out of the harvest seasons. I am the PWSSA President and I hold a seat on the CDFU, PWSAC, and Salmon Harvest Task Force Boards where I advocate for commercial fisheries in our region.

I have been actively participating in the PWS shrimp pot fishery as a commercial fisherman since 2022 and a permit holder since 2021. In 2021 I failed to register, but was intending to fish commercially. Generally speaking, a CFEC permit card is what allows you to commercially operate in that fishery, so the registration addition was quite confusing for a new entrant.

In just 3 years of involvement, I have developed a business that directly ties into all my other commercial operations. I greatly depend on this shrimp fishery to get started financially in other commercial fisheries in the Prince William Sound. I first built out my setnet skiff to operate in the shrimp fishery and this year I purchased a CFEC S03E permit and commercial vessel in the PWS drift gillnet fishery. A large portion of the decision to make this vessel purchase was to obtain an ideal vessel for operating in the PWS commercial shrimp pot fishery. This boat was modified by the previous owner to commercially operate in the PWS pot shrimp fishery.

As a direct marketer, I have established relationships with wholesale seafood buyers locally as well as in other parts of the United States. These relationships are strongly tied to the fact that I have PWS spot prawn shrimp for sale. I also sell these markets some salmon, but there is a lot of our relationship that depends on spot prawns, as they are such a unique and hard to find delicacy. I am able to sell these processed and packaged spot prawns for a premium price. [[This has become such an important part of my direct marketing business that I developed my own branding this winter to further expand my business.]]

This brings up a question on the point system. Why are processors and catcher sellers awarded extra points, but there is no mention of direct marketers? Direct marketing licensing and associated costs are much more significant than a simple catcher seller permit. A direct marketing license shows commitment to this fishery and should be granted at least equal points as a catcher seller.

As fishermen fully intending to be a commercial harvesters and direct marketers in this fishery, we should have equal opportunity to get a permit compared to someone that has fished all 5 of the seasons with significantly less effort. I along with other commercial fishermen have demonstrated high effort and harvest levels in the years since we have entered this fishery. Multiple pot lifts a day and consistent daily fishing show full intent of executing this as a commercial fishery.

Recent years should have the highest level of importance. Pot pulls and commercial effort should have more impact on getting a permit than poundage.

Point system doesn't make sense. A person that fished in 2019 and 2020 has a better chance of getting a permit than a person who fished in 2023 and 2024 and who is actively working to be successful in this fishery. 2023 and maybe even 2024 should be included unless there is a significant spike in registered participants in 2024. This shows people that are currently active and eager to participate in this commercial fishery. If everyone was aware that this fishery might go limited entry, the people most deserving of permits are those of us showing high and consistent commercial effort in the most recent years. If you weren't fishing in the most recent years, doesn't that show a lack of intent or desire to operate in this fishery commercially for the long term?

That being said, have entrants drastically increased in the last few years? Since this petition was public, it seems permits have been stable or gone down. Therefor, I am struggling to see the argument for punishing new entrants with the assumption that they are only getting involved to get a permit. It is also quite a risky investment to dive into if you are just hoping for a permit and not truly intending to fully execute this fishery at a commercial level.

Points awarded for number of deliveries should be replaced by number of pot lifts. Pot lifts are a much better representation of commercial effort in the shrimp fishery.

I also question the accurate reporting of personal use on fish tickets. How many people just write a fish ticket as commercial harvest and then fill their freezer with those? It is hard to believe that only 10% of the harvest is going to personal use.

I think it is also important to look at previous involvement in other commercial fisheries in the region. In order to be successful as a commercial fisherman, many of us must be active in multiple commercial fisheries to make loan payments and succeed in this lifestyle career.

As a commercial fisherman that needs to be involved in multiple CFEC fisheries to survive, pulling a permit away from someone that is a full time commercial fisherman is only setting us up for failure in the business. With salmon markets so low and unstable, this shrimp fishery has significant importance on my success in all the commercial fisheries I am involved with.

I think for the longevity and economic viability of this fishery, it does need to go limited entry. The questions really come down to who gets these permits and will fully operate as commercial harvesters and how many of these limited entry permits are issued and how many interim use permits are granted. The way it is currently laid out, if 63 or more people show significant economic dependency on this fishery, there will be no interim use permits issued. I don't see how this will change the fishery for the long haul, but I do think we need to start somewhere. In the end it may be better to have more interim use permits, so over time this fishery becomes smaller and there is more economic opportunity for those permit holders that remain in the fishery.

From my understanding of this process in the past, there has also been an opportunity for interim use permit holders to continue fishing and prove their qualification for receiving a limited entry permit. If this is the case, how will this effect the long term number of limited entry permits allowed?

Thank you for the opportunity to comment.

Sent from my iPhone

From: [John Johnson](#)
To: [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)
Subject: Comment on Proposed Changes in the PWS Commercial Shrimp Fishery
Date: Wednesday, July 24, 2024 12:40:08 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I have been a registered commercial fisherman in the Prince William Sound shrimp fishery for 3 seasons now, 2022-2024. I have been fortunate enough to effort all 3 zones now. My first year was to test the waters on what the commercial industry was all about, and I efforted 12 pots with my annual returning deckhand James Benedict. After figuring the workings of the process out, I returned last year as a catcher seller and provided a full season effort for 2023, zone 2, with the 25-pot maximum until the fishery was closed for the season. This year was tough with the shrimp population and location of zone 3, but I still returned for a limited effort in zone 3.

After investing in getting set up to commercial shrimp with 25 pots, I have now been informed there's a likelihood that I may not have an opportunity to continue my efforts. This is disappointing, mostly based on the following:

This is one of the last remaining open commercial opportunities in the state, not requiring purchased or leased permits to partake in an effort.

The total gross catch available for the fishery is very limited compared to other major fisheries in the state. The opportunity for large volume income has never really been present, especially with the salmon/guiding season encroaching on the shrimp season, causing most participants to remove themselves from the effort after the first opener.

The availability to catch as much as you want to sell is there. If you want to catch more shrimp, then spend more time out there. Plenty of others remove themselves from the effort annually.

Ultimately, the decision is with the managers of the commercial fishery. There is really nothing ultimately wrong or pressing with the current situation. I understand the possible need to penalize those who apply yet don't participate, as that can adjust calculated pot quantity restrictions or opener periods. Maybe make them be penalized with a 1 year waiting period until they can re-enter or something. There's no good answer, but closing down an open commercial fishery with no incredibly great cause at hand is saddening.

Thanks for your time,

John Johnson

F/V Glacier Chaser



ADF+G # 79318

From: [Joseph Person](#)
To: [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)
Subject: Proposed PWS Pot Shrimp Limited Entry Comments
Date: Wednesday, July 24, 2024 4:48:06 PM

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

My name is Joseph Person and my family has participated extensively in the PWS Shrimp fishery since its re-inception in 2010 on the F/V Traveler for the last 13 of those. Over the last 15 years it has developed and stabilized into an extremely unique fishery and makes up a very significant percentage of yearly financial support for both myself and my parents. Discussions of limiting entry to this fishery have existed since 2010 and I have always been opposed to the idea and felt it was not a good fit for our fishery and I still maintain that position. Over the past 15 seasons, measured by either on water days or pot lifts, I believe we have participated in this fishery more than any other vessel or permit holder by a significant margin. In theory, fishermen like myself, with extensive effort, investment, and dependence on a fishery are exactly who "should" benefit from a fishery going limited entry. Nominally the entire purpose of a fishery going limited entry is to protect the continued economic viability of the fishery for historically invested participants, but in this case I completely fail to see any benefit at all. I maintain that the fishery is just not a good fit for Limited entry and will attempt to explain why I believe that in this comment.

To start with, it is important to have a good understanding of the current economic, political, and biological conditions of the fishery. This is a very small fishery. Its total value ranges from approximately 400,000-700,000\$ annually. The most basic of arithmetic is enough to demonstrate that this fishery is not capable of producing substantial economic production for 64 vessels. So if that is the general goal of going limited entry, it is absolutely destined to fail. Nothing about the limited entry program is supposed to reduce the number of vessels in the fishery, and it will not. It is supposed to more or less fix effort at the current point which has been stable for quite some time. This is an extremely important point. It will not inherently do anything to improve economic viability from where the fishery is RIGHT NOW. Vessels and operators who currently find the fishery to not be financially viable, will STILL find the fishery not financially viable going forward if it goes limited entry. As we speak the 2024 quota is going largely unfished and most likely will not be caught. If anything, in this year's example, the fishery is under utilized and limiting entry serves absolutely no benefit.

The idea of "economic viability" is fundamentally the wrong approach of how to view and evaluate success in this fishery. It is too small. This fishery has two main factors that make it the vibrant, unique, healthy fishery that it currently is. First it is a small fishery for a valuable, high demand, product located close to population centers. It is the most ideal fishery in the entire state for supporting direct market and value added marketing directly to local consumers. A majority of the harvest is sold directly from fishermen to local customers which is an incredibly unique and valuable thing in the Alaskan commercial fishing industry. It allows access to an incredible local resource and allows members of the public to eat amazing Alaskan seafood that otherwise is restricted to the relatively small percentage of people who

have the time, money, and infrastructure to go catch it themselves and serves as incredible public relations outreach for the fishery itself and the industry as a whole. Secondly, this fishery is one of the last true easy entry starter fisheries that someone can get in to if they just want to get a taste of the "commercial fishing experience" or to work their way into larger fisheries. There are very few of these fisheries left and it is an extremely important part of bringing new blood into the industry and combating much maligned issues such as the "greying of the fleet" overall in the industry as a whole. These two factors; giving access to local shrimp to regular Alaskans, and being a uniquely available entry fishery are the primary advantages of the PWS Shrimp Fishery. Limited Entry may or may not help the first (as explained in previous paragraph it is probably net neutral), but it absolutely harms the second.

Currently, the fishery is in an extremely precarious spot. Under current management regulations it is quite likely to not even happen in the next few years. I have been highly involved in the regulatory process for this fishery and have written multiple proposals that were accepted into the current management plan. I have multiple proposals currently submitted for consideration during the Board of Fish cycle this coming winter. I am extremely concerned that going limited entry right before these decisions to potentially rework our fishery will both influence the process and have many unintended consequences. For example, it is very likely that if the fishery continues to be prosecuted going forward that it will be significantly smaller than it was during the qualifying years. This is almost a certainty. It is quite possible that it will not even be able to support the proposed number of permits and that it will stabilize to lower participation. There has already been a slight downward trend in recent years. It is extremely poor timing to make a decision to go limited entry when both management and stock assessment are likely to see substantial changes.

This entire push for limited entry came about because of the misguided efforts of a number of participants who fundamentally do not understand the fishery. This is made very clear by their initial requests for limiting entry. Basically every concern they brought forward was refuted by the report produced by CFEC. The existence of many small operators in this fishery is not over crowding it and/or causing the quota to be caught too quickly or the season to end early. In fact the fishery is relatively top heavy as CFEC can clearly see by quartile tables and production reports. The vessels that have found it to be financially viable will continue to and the ones that haven't won't, regardless of limiting entry or not. Ironically, the majority of the people most actively supporting limited entry actually fall into the category of relatively small, low effort, producers that they are complaining about. The small operators, ease of entry, feasibility of direct marketing, and conservative management by the department are what define this fishery and make it unique and successful. Limiting Entry helps none of these things and I would very much be sad to see a fundamental change towards over commercialization of this fishery. I love this fishery and would like to participate in it for another 30 years, but I also want it to be available for anyone else who wants to participate in it to be able to experience its special characteristics and the joy of direct marketing amazing seafood to their friends and neighbors. This fishery is the small local market garden of Alaskan fisheries. Let's keep it that way.

Thank you
Joseph Person