

**From:** [Bruce Bowman](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** Oral testimony for draft regulation of PWS pot shrimp fishery LE regulation  
**Date:** Tuesday, March 26, 2024 4:12:22 PM

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Bruce Bowman oral testimony,

I would like to take a moment and thank the commission for their efforts toward limiting entry to the PWS pot shrimp fishery and developing the draft regulations we are here to discuss.

I personally concur and support the positions forwarded by ShrimpPros here today. The ideas and rationale are in alignment with my own.

In an effort not to belabor the points noted in ShrimpPros comments, I will sum it up and say: That the final evaluation process proposed should address/include points for the longevity of participants (2010-2018)

The conversion factor for tail to whole weight of spot shrimp should be reflective of the methodology used by the department consistently to manage the fishery and be a factor of 2 (x2).

Vessel casualty, major health issues and extreme personal situations that may have prevented participants from operating should be considered.

Lastly, economic dependence, may in some cases not be reflective of the investment and effort put forward by a long term participant. to be involved in this unique short duration fishery in a deliberate and consistent manner and have other employment opportunities for approximately 10 months of the year should not result in being denied a permit.

Thank you again for the hard work developing these regulations and considering the input you are receiving here today.

**From:** [REDACTED]  
**To:** [Haight, Glenn E \(CFEC\)](#)  
**Cc:** [Porcaro, Mike F \(CFEC\)](#)  
**Subject:** Limited Entry PWS Shrimp Fishery  
**Date:** Thursday, February 15, 2024 10:36:58 AM

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F/V Rose Marie  
ADFG #78521  
Processing License AK13912

Good morning Glenn,

Following up on the decision to possibly implement a Limited Entry for the PWS Commercial Spot Shrimp Fishery.

The PWS Commercial Spot Shrimp Fishery is unique compared to many fisheries in Alaska. The main uniqueness is the fishery does not have well established infrastructure like canneries, tenders etc., to process and market shrimp. The fishery began in 2010 and one can expect growing pains as the fishery is in its infancy. A large percentage of growth in the fishery has been in the last 7 years, exposing some peculiarities of the fishery.

Limited Entry should only be used as a last resort if there were no other options to address the current concerns put forth by participants of the fishery. There must be alternative avenues (regulatory and innovation by participants), that could be implemented to address challenges facing the fishery.

On the innovation side of the equation, one of the tools available to participants is a Processing License. This tool addresses the greatest challenge faced by catcher/seller participants, having to market their catch before it spoils. Other major benefits of this tool are, you maximize fishing time, reduces fuel consumption, reduces dependence on the duration of the fishing season and allows for more consistent distribution of the product. The time and effort to obtain a Processing License is far out weighed by the benefits it provides and is an innovative way to increase profitability.

We began commercial shrimping in 2018 and have fished commercially every year through 2023. We fell into the category of operators who reported commercial sales and had personal use recorded. We sold our catch to a tender and also brought product home to sell to the public. The personal use was created in a necessity to

freeze the product before it spoiled making it unmarketable. In late 2022 we obtained our processing license, (AK13912) and was instrumental in changing our productivity and financial gains. In 2023 we harvested and sold 2.64% of the GHJ and made a total of 3 landings. With the proposed Limited Entry we may not qualify for a permit based on our past performance but its not a true reflection of our effort to become a viable shrimping company. I imagine our case is not singular, not everyone has the opportunity to be part of a larger organization that has access to marketing and processing. Having spent 6 years in the fishery I believe there is a lot of room left for innovation by the participants if their willing to make the changes. We have spent considerable time and money in developing our commercial fishery business to become one of the top producers and we enter the 2024 season with a cloud of apprehension over our heads not knowing what the future holds.

The PWS Commercial Spot Shrimp Fishery being in its infancy and with its uniqueness, should be allowed to develop through innovation by participants and implementation of less restrictive measures than what Limited Entry provides.

Please feel free to contact me.

Attached are photos of our commercial processing

Thank you,

Doug Frasher

**From:** [Haight, Glenn E \(CFEC\)](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** FW: CFEC Clarification  
**Date:** Wednesday, March 27, 2024 4:57:51 PM  
**Attachments:** [CFEC Page 6.pdf](#)

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**From:** [REDACTED]  
**Sent:** Monday, March 18, 2024 7:51 AM  
**To:** Haight, Glenn E (CFEC) <glenn.haight@alaska.gov>  
**Subject:** CFEC Clarification

**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.

Good Morning Glenn,

Received draft of the proposed guidelines for the PWS Spot Shrimp Limited Entry. Would you be able to have someone clarify on page 6 if there has been a typo made on the Pounds Harvested/deliveries made chart. I attached a copy of page 6 and highlighted the words in question.

Thank You,  
Doug Frasher  
F/V Rose Marie

(3) The commission will award an additional 4 points to an applicant who made commercial deliveries in the Prince William Sound shrimp pot fishery in three of the four qualifying years listed in 20 AAC 05.837.

(b) Consistent Participation and Economic Dependence. The commission will award a maximum of 32 points to an applicant for consistent participation, investment, and economic dependence on the Prince William Sound Alaska shrimp pot fishery as follows:

(1) The commission will award a maximum of 16 points to an applicant for consistent participation based on a minimum number of pounds harvested or a minimum number of deliveries made in a year as follows:



Year	Pounds harvested/deliveries made	Points
2019	If harvested 1000 pounds or more and made 4 or more deliveries	4
2020	If harvested 1000 pounds or more and made 3 or more deliveries	4
2021	If harvested 1100 pounds or more and made 4 or more deliveries	4
2022	If harvested 1100 pounds or more and made 4 or more deliveries	4

(2) The commission will award an additional 2 points for any year within the four-year qualifying period listed in 20 AAC 05.837 where an applicant made commercial shrimp harvests and obtained a catcher/seller permit as defined in 5 AAC 39.130(o)(4). if the applicant did not obtain a catcher/processor permit in that same calendar year.

**From:** [Haight, Glenn E \(CFEC\)](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** FW: PWS Pot Shrimp Clarification Request  
**Date:** Wednesday, March 27, 2024 4:56:02 PM

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FYI

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**From:** [REDACTED]  
**Sent:** Monday, March 18, 2024 7:51 AM  
**To:** Haight, Glenn E (CFEC) <glenn.haight@alaska.gov>; Johnson, Reid H (CFEC) <reid.johnson@alaska.gov>  
**Subject:** PWS Pot Shrimp Clarification Request

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Good morning Glenn, Reid, or whom it may concern at CFEC

Thank you for sending out the information about the PWS Shrimp Pot Limited entry meeting coming up, and a proposed point system draft.

I have a few questions for clarification on that document. It would be nice to get your interpretation of these quickly if possible, in order to better be able to comment on it.

First, in the paragraph (2) at the bottom of page 6 and paragraph (3) at the top of page 7, it seems to me that it would be easier to interpret if the word “any” were replaced by the word “each”. That was the only way that I could figure how one could come up with the maximum points stated for that section.

Also how do direct marketers fit in here?

Secondly, on page 7, 20 AAC 05.840 with the point totals and hardship classifications has me a bit confused.

Section (a) states that 25 – 76 points would qualify for a transferable permit.

Section (b) states that 0 to 15 points would qualify for a non transferable permit.

But I do not see where it says what happens if someone has 16 to 24 points !

Is this section written in error, or left something out?

Please clarify this.”

Thank you  
Gordon Scott



**From:** [Matthew Spernak](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Cc:** [Ellickson, Nick L \(DFG\)](#)  
**Subject:** CFEC Public Notice: Draft Proposed Regulations to Limit PWS Commercial Shrimp Pot Fishery  
**Date:** Wednesday, April 10, 2024 2:50:43 PM

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When we went to the public meeting in March it was spoke that the year 2023 or 2024 couldn't be used in the evaluation criteria because, with the word out, people could be coming out of the woodwork. With the fishery registration now complete. The info is out and 95 boats registered. Which is not a large increase. 2023 and 2024 should be included in the evaluation being that is the most current that a fishermen put out money and effort to participate. Our permit was threw out in 2022 for not properly registering with Jane, so after that ended up deck handing on another boat, which is still zero points. And properly entered in the 2023 and 2024 fishery. We did fish the 2023 season. The pot limit for 2024 is 35 pots. We decided to buy the 10 extra pots and go out still even though the talk of cutting our legs out from under us after this season.

We will not have any points on the current draft. And are guaranteed to not be eligible for a permit forever. That my kids that are excited to be a part of this will not get to. It doesn't seam right, that the guy I bought my gear from in 2022 when he sold his boat and retired. Is one of the people getting behind the limited entry because he would get a transferable permit and have options to do things with it(sell, lease, use) with out even owning a boat.

Thanks

Matt Spernak



**From:** [Matthew Spernak](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** RE: CFEC Public Notice: Draft Proposed Regulations to Limit PWS Commercial Shrimp Pot Fishery  
**Date:** Friday, March 15, 2024 4:34:38 PM  
**Attachments:** [image001.png](#)

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Why are the points based off 2019 -2022 instead of 2020-2024 seasons? Seems to favor group of people that started the petition in the first place. People have spend money on gear and getting set up without warning of this coming up. At least the points should include the seasons to current.

Thanks

**Matthew Spernak**  
**Spernak & Son LLC**  
**905 E. 100<sup>th</sup> Ave**  
**Anchorage, AK 99515**



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**From:** DFG, CFEC PublicQuestions (DFG sponsored) <DFG.CFEC.PublicQuestions@alaska.gov>  
**Sent:** Friday, March 15, 2024 2:42 PM  
**Subject:** CFEC Public Notice: Draft Proposed Regulations to Limit PWS Commercial Shrimp Pot Fishery

## **COMMERCIAL FISHERIES ENTRY COMMISSION**

### **NOTICE OF PUBLIC MEETING**

The Commercial Fisheries Entry Commission (commission) is holding public meeting in Anchorage on **March 26, 2024**, at the Egan Civic and Convention Center located at 555 West 5<sup>th</sup> Avenue and through web conference. The meeting will occur immediately after the Alaska Department of Fish and Game (ADF&G), Division of Commercial Fisheries Prince William Sound (PWS) commercial shrimp fishery 2024 season management review to start at 5:30pm. The meeting will be held in the Joint Board of Game and Fisheries meeting room located at the Egan Center.

This commission meeting will be held to discuss the development of draft proposed

regulations to limit the PWS commercial shrimp pot fishery. Once the draft regulations are finalized, the final proposed regulations will be noticed for further public comment pursuant to the Administrative Procedure Act (AS 44.62.190).

The Limited Entry Act (the Act) limits the number of commercial fishing permits allowed to operate within designated fisheries in Alaska. The Commission was established in 1973 in order to administer the Act (AS 16.43.010). The stated purpose of the act is to promote the conservation and sustained yield management of Alaska's fishery resources. Additionally, the Act seeks to uphold the economic health and stability of the commercial fishing industry in Alaska.

In December of 2021, the commission was petitioned to limit the PWS commercial shrimp pot fishery. Following a lengthy review involving analysis on historic fisheries information, a public hearing, and a survey of the fleet, the commission voted to propose limiting the fishery in December 2023.

Since that time the commission drafted proposed regulations to establish a maximum number of permits to issue, the participation period years, and an application scoring system. The draft regulations are under review by the Department of Law and will be separately noticed and published for public comment when approved. The public will have at minimum 30-days to respond. Following review and response to public comment, the commission will make a final decision on how to limit the fishery.

The commission will use its meeting on March 26 to introduce the draft proposed regulation to meeting participants and seek public comment. While not in its official public comment period, the commission will nonetheless take all public comments through public testimony at the meeting into consideration and include them in its response to the public comments received on the proposed regulations. By March 18, 2024, a tentative agenda will be posted on the commission's website and at its office. This agenda will also be available by request. A copy of the draft proposed regulations are also available on the commission website and upon request.

The public is invited to attend the meeting. The ADF&G season review and CFEC public hearing will be available via a web conference link. Use the following web instructions to participate virtually:

<https://us06web.zoom.us/j/85082315153?pwd=mgmUVkhjt5peYi9erRGthJboyG96p2.1>

(Click link to access the Zoom meeting)

If you have any questions, or would like to submit a written public comment, please reach out to CFEC at either [DFG.CFEC.PublicQuestions@alaska.gov](mailto:DFG.CFEC.PublicQuestions@alaska.gov) or PO Box 110302, Juneau, Alaska 99811-0302.

If you are a person with a disability who may need accommodation to attend, please contact CFEC at the email or address above by March 21, 2024, to ensure necessary accommodations can be provided.

By the Direction of the Commercial Fisheries Entry Commission.

/s/ Glenn Haight

Glenn Haight, Chair

Mike Porcaro, Commissioner

Date: March 15, 2024

**Commercial Fisheries Entry Commission**  
PO Box 110302, Juneau, Alaska 99811-0302  
Website: [www.CFEC.state.ak.us](http://www.CFEC.state.ak.us)



**From:** [Matthew Spernak](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\); Ellickson, Nick L \(DFG\)](#)  
**Subject:** Commercial Shrimp Fishery PWS  
**Date:** Thursday, March 28, 2024 5:59:54 PM

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I went to the public meeting at the Eagen Center this week. The points that I took from the meeting is most everyone wants to fish, they just don't want others to.

What I took from it was a ton of stories of hardship and economic need to be able to fish the fishery. Which seems to not be realistic as an income besides a little bump or bonus cash. After looking at the 2022 PWS reports salmon alone(no cod, halibut, crab, ect) produced over \$100,000,000.00 in revenue per the reports. While Shrimp was under \$700,000.00. That number is just over half of one percent of what the commercial fishermen in PWS took in. That number is so small the margin of error in the fishery is probably the same size if not larger than the gross revenue of the shrimp fishery.

People complain about to many people and that the openings are to small. From what I have taken from talking to the Fish and Game group in charge of the openers. That they have a hard time figuring out how many percent of the entries will fish, is one of the largest unknowns in the openers. With roughly 40% not fishing without consequence isn't helping anyone.

Hunting and fishing recreation permits now have that you can't participate the following season if you fail to report. I believe, as well as some of my friends the this license should have something similar. If you register for the fishery fail to fish it that season, that you get the same slap on the wrist and couldn't register for the following year only. It would cut down on how many boats are out, would help nick get a more accurate number of serious fishermen and the people that came on whatever personal hardship that kept them from going are only out a year, not lose the experience forever.

If an arbitrator is to go over a case with a large number of opinions. Usual determination everybody wins and loses a little. I believe this does that.

On another note. We have been doing this with friends and family for a few years. We have spent a ton of money getting started and are learning the areas, zone by zone. And planned on increasing efforts after learning the zones. The experience that PWS brings to us and the ability to organize and bring friends and family out to participate in the fishery has been a pleasure and would feel a large lose. Especially to the concept that some guys, that already experience the whole summer on the water also want to themselves for minimal income change for them.

Thank you

**Matthew Spernak**  
**Spernak & Son LLC**  
th

905 E. 100 Ave  
Anchorage, AK 99515



My name is Seth Rockwell, I am a commercial fisherman of over 25 years.

In regards to the proposal of turning Prince William Sound Shrimp Pot Fishery into a limited entry fishery, we need to look back to when it was first reopened after a decades-long closure.

Upon the re-opening of Prince William Sound Commercial Shrimp Pot Fishery in 2010, a large portion of the participants were "Career commercial fisherman" people for whom fishing is their only or main source of income.

Due to the extensive restriction of gear allowance, 20 to 40 pots to start most years, compounded with a vacation style fishery management, this had created an environment where it is time and cost prohibitive to make enough money to sustain as a commercial source of income. A small portion have persevered trying to catch the openers they can while preparing for fisheries that can sustain their bills. Through three different fishery managers they have attempted to have this fishery reflect a properly executed commercial fishery. No other pot fishery in the state is managed in this way. This coupled with the growing competition in the sport fishery and reduction of sport fishing opportunities for PWS shrimp led to more recreational "commercial fisherman"- these are people who do not make their living from commercial fishing but take some time off from their main income-generating job and participate in a commercial fishery. This environmentally and financially irresponsible manner of management needs to change first and foremost. Only then will creating a limited entry platform make this a viable fishery. Southeast Alaska shrimp Pot fishery Opens for a set length of time and closes stat areas as GHLS are achieved for the area. Most years in Southeast the first stat area is closed in two to five days allowing a 140 pot limit of the same legal pot size of Prince William Sound. Since 2012 in Southeast, the longest it has gone without an initial closure in an area is 9 days. First closed stat areas were anywhere from 7,500 lbs to 35,000 lbs GHLS with a mean of 26,000 lbs. By contrast Prince William Sound's earliest closure of a stat area is 15 calendar days and 11 fishing days from the initial opener.

In regards to limiting the fishery to a set number of permits, it is essential to look back to the initial reopening of Prince William Sound Pot shrimp fishery followed with creating a tiered Pot Permit based on but not necessarily limited to the following parameters:

**1 In order to receive top Tier Permit, Fisher must have participated in 7 or more years of the fishery, this is a little over half of the years using 2020 as cutoff. Or exactly half using 2023 as cut off. If participation is carried through the 2024 season then the top tier should have moved to 8 years participation which will put it at just over half.**

**2 fishermen who have code 95 or (personal use) for more than half of their landings, if eligible for a permit, should receive a bottom tier non transferable permit. Excessive personal use is the most susceptible to under reporting and illegal sales. This also more closely resembles subsistence/sport use vs commercial. Subsistence/sport are managed separate from commercial.**

**3 Put enough pots in the fishery to execute it in a timely manner and to spread out the effort. More pots in fishery will enable people to move around more and spread out effort rather than camping on their favorite "Honey Holes"**

**3,000 to 3500 pots in total for PWS should be target.**

**\* CPUE average over the last 6 years for first Open period has been 1.66 pounds.**

**4 Direct the fishery to be managed to be opened at first legal day per regulation, closed on last day of regulation, then close by emergency order stat areas and the fishery as GHLS are achieved.**

**5 Require a daily reporting to properly manage the ongoing fishery and a notice of delivery time and place no less then 3 hours prior to delivery.**

**6 P91E permits should be considered for higher pot status as this vessel class has been discriminated against in most state fisheries.**

**Examples of potential pot structure:**

<b>Tier</b>	<b>No permits issued</b>	<b>no of pots</b>
1	10	140
2	10	100
3	10	75
4	20	50
5	10	10

**Total Permits Issued: 60**  
**Total Potential Pots: 3450**

1	10	140
2	5	100
3	6	75
4	15	50
5	10	20

**Total Permits Issued: 46**  
**Total Potential Pots: 3300**

CFEC Public Meeting  
RE: PWS pot shrimp fishery limited entry  
March 26, 2024

#### ShrimpPros Association Oral Testimony

Thank you to the Commission and CFEC staff for the enormous amount of work that has been accomplished, which has brought us to the draft of proposed evaluation criteria for limited entry applicants to this fishery.

Alaska statute AS 16.43.250 guides the Commission in formulating these evaluation criteria and there are two main areas for consideration. First, the economic dependence of an applicant upon this fishery, reliance on alternative occupations, and investments in vessels and gear. Secondly, the extent of past participation in the fishery, including, when reasonable for the fishery, the number of years of participation in the fishery, and the consistency of participation during each year.

With respect to the first metric, economic dependence, the draft regulations in 20 AAC 05.839 (1) awards a very high bonus to late entrants who may have been big performers. This bias favors those applicants who are the newest, and therefore would be those who have also invested the least in consistent operation, and market development. This bias should be removed by leveling the points system that now prefers late interim entry in 2021 and 2022. There is a maximum of 36 points in this section, but it should be closer to a maximum of 32, by using the award levels of 2020 and applying that to all four qualifying years.

The second statutory metric is longevity. The proposed point system offers the least amount of points for longevity, which is now 4 points if an applicant can demonstrate 3 landings in any of the 4 application qualifying years of 2019-2022. 20 AAC 05.839 (3) We believe this does not adequately address longevity for the recent fishery, which began again in 2010.

In order to be equitable and respect the statutory requirement to consider both the number of years of participation and consistency during each year, it would be more appropriate to give one point per year that an applicant has both participated in and made at least one landing over the period of 2010-2022. This would more fairly represent those who have consistent participation and long time investments in market development. We have not found anything in statute that would prevent this from being considered as part of the points calculation; even when defining the qualifying years of 2019-2022 for the eligibility to apply for a permit.

This longevity adjustment would also remove any short term bias over those four qualifying years by accommodating unforeseen issues like vessel casualty, medical issues, or personal situations that could affect an applicant over the narrow qualifying window, which currently represents only 30% of the modern fishery timeframe.

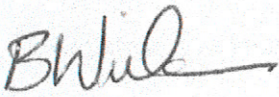
The proposed section 20 AAC 05.841(c) conversion factor for tails to whole pounds of shrimp states that this is, "the Department of Fish and Game conversion factor of 1.67 for all shrimp species and all size classes of shrimp."



However, those who have reported in tails would be penalized. Department shrimp fishery managers use a conversion factor of 2.0. When this fishery is managed in season, and a fish ticket is submitted in tails, that is converted to whole pounds of shrimp by multiplying 2. That is how the GHL is accounted for and the fishery managed. It would be more appropriate to use the actual conversion factor used in the management of this fishery.

The only other comment would be to express our appreciation for all of the hard work from CFEC and look forward to working through these necessary adjustments and public process that will have what we hope is a profoundly positive impact on this artisanal fishery.

Respectfully,

A handwritten signature in black ink, appearing to read "BWilbanks", with a long horizontal stroke extending to the right.

Brett Wilbanks, Chairman  
ShrimpPros Association

**From:** [Vincent Haag](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** RE: CFEC Public Notice: Draft Proposed Regulations to Limit PWS Commercial Shrimp Pot Fishery  
**Date:** Wednesday, April 3, 2024 3:19:57 PM  
**Attachments:** [image002.png](#)

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Greetings. My name is Vince, and I am 30 years old, and a lifelong Alaskan. All though I personally have not obtained my own PWS commercial shrimp permit, I have participated 2 consecutive years as a deck hand on several different smaller vessels that have permits. So, although my experience in the fishery is limited, the impact from this new proposed point system is still just as valid in my life as it is in others. Through my experience participating in this fishery, both myself and my now 6-year-old son, have both bonded, explored the beauty of prince William sound, learned the importance of conservation of fisheries, and developed memories for a life time. This proposed ruling makes the opportunity for myself, my kids, and my family members, near impossible to participate in the commercial fishery in the coming years. Although we don't depend on the fishery financially, we do depend on the fishery in some capacity for subsistence. This proposed ruling could make the opportunity for me to one day captain my own boat and participate in the fishery, near impossible. I would hope that there could be a mutual decision reached that doesn't exclusively target the small operators. Please reconsider the proposed point system.

Thank you.

Vincent Haag  
Equipment Manager



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**From:** DFG, CFEC PublicQuestions (DFG sponsored) <[DFG.CFEC.PublicQuestions@alaska.gov](mailto:DFG.CFEC.PublicQuestions@alaska.gov)>  
**Sent:** Friday, March 15, 2024 2:42 PM  
**Subject:** CFEC Public Notice: Draft Proposed Regulations to Limit PWS Commercial Shrimp Pot Fishery

**COMMERCIAL FISHERIES ENTRY COMMISSION**  
**NOTICE OF PUBLIC MEETING**

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[https://link.edgepilot.com/s/079df7ab/BKIM4-\\_GukSGY5GP3NvzIw?  
u=https://us06web.zoom.us/j/85082315153?pwd=mgmUVkhjt5peYi9erRGthJboyG96p2.1](https://link.edgepilot.com/s/079df7ab/BKIM4-_GukSGY5GP3NvzIw?u=https://us06web.zoom.us/j/85082315153?pwd=mgmUVkhjt5peYi9erRGthJboyG96p2.1)

(Click link to access the Zoom meeting)

If you have any questions, or would like to submit a written public comment, please reach out to CFEC at either [DFG.CFEC.PublicQuestions@alaska.gov](mailto:DFG.CFEC.PublicQuestions@alaska.gov) or PO Box 110302, Juneau,

Alaska 99811-0302.

If you are a person with a disability who may need accommodation to attend, please contact CFEC at the email or address above by March 21, 2024, to ensure necessary accommodations can be provided.

By the Direction of the Commercial Fisheries Entry Commission.

/s/ Glenn Haight

Glenn Haight, Chair

Mike Porcaro, Commissioner

Date: March 15, 2024

**Commercial Fisheries Entry Commission**

PO Box 110302, Juneau, Alaska 99811-0302

*Website:* [https://link.edgepilot.com/s/bb637803/d7NBWUU4qk\\_K4RSJUdefRw?  
u=http://www.cfec.state.ak.us/](https://link.edgepilot.com/s/bb637803/d7NBWUU4qk_K4RSJUdefRw?u=http://www.cfec.state.ak.us/)



**From:** [ELLIS BROCK](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** Shrimp Pot fishery comments for July,11,2024 Meeting  
**Date:** Saturday, July 6, 2024 4:39:20 PM

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Dear CFEC,

Hello, we are a family business and have permitted two boats in this fishery going back nine years (Miller Draft and Grandpa) and one boat in this fishery going back ten to twelve years (Miller Draft). We think this fishery needs to go back further when considering who to give permits to as it seems like there was a lot more permits given out during covid and after. We also believe that 60 or more permits are too many for this fishery. We have always sold our shrimp and did not know until recently that we could retain any under personal use. Thank you for considering our thoughts on the matter.

From, Ellis Brock and Family  
Vessel Miller Draft and Vessel Grandpa

**From:** [Tyee Lohse](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** Pws shrimp  
**Date:** Saturday, July 6, 2024 2:11:58 AM

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To whom it may concern, I am writing in opposition to the proposed language for the limited entry shrimp permit process. I don't see how limiting the participants will change the shrimp harvest when it is a set amount of pounds. I personally have invested a lot of money and time into my commercial shrimping operation; hauler,pots,baiters,lines,bouys,table, baskets, I have enjoyed commercial shrimping with my family in the spring over the last few years and intended to continue this venture. I don't believe I will qualify for a permit along with a lot of other active participants. The way the shrimp season has been operating works, the people that shrimp the longest and hardest make the most money and catch the most shrimp. By limiting entry you give a small group of people the whole resource. I am a third generation fisherman from Cordova, Ak. Commercial fishing is my only source of income, I have enjoyed and would like to continue to enjoy this one open fishery I participate in. Thank you Tyee Lohse  
Sent from my iPhone

**From:** [Haight, Glenn E \(CFEC\)](#)  
**To:** [Brett Roth](#)  
**Cc:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** RE: Proposed regulations for the PWS Commercial shrimp pot limitation process  
**Date:** Friday, June 14, 2024 11:13:12 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Hi Brett,

Thanks for the question and reminder. If I'm recalling correctly, I believe I misspoke at the meeting.

It is an "and". The "or more" qualifies the pounds caught. So both tests need to be met to earn the points.

The section awards points to people that fished more times than the average in any one year, but also who caught more. There are examples of people who would go out frequently, but not harvest much poundage.

If you have comments on that element, please let us know.

Thanks and I hope you're well.

Glenn

Glenn Haight, Commissioner  
Commercial Fisheries Entry Commission  
PO Box 110302  
Juneau, Alaska 99811-0302  
907-790-6942 (w)  
907-789-6170 (f)  
[glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)



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**From:** Brett Roth [REDACTED]  
**Sent:** Friday, June 14, 2024 10:45 AM  
**To:** Haight, Glenn E (CFEC) <[glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)>  
**Subject:** Re: Proposed regulations for the PWS Commercial shrimp pot limitation process

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Hello Glen,

Hope all is well and congrats to Rick Green on his appointment! I have one question about the proposed PWS shrimp regulations that I am hoping you can assist me with. This is the same question I asked you at the meeting at the Egan and there you told me that the intent of the commission is to award points in section b part 1 for having a certain number of pounds **OR** a certain number of deliveries in a given year. I just want to confirm that is the case because I can still read it either way depending on whether I am looking at the table of the text for that section.

In the proposed regulations section b part 1 the text reads in a way that matches what was said in the meeting, namely that the provision is **an "OR" provision not an "AND" provision:**

*(1) the commission will award a maximum of 16 points to an applicant for consistent participation based on a minimum number of pounds harvested **or** a minimum number of deliveries made in a year as follows:*

However, the table below the text makes it read as an "AND" rule to me:

Here is an example of the text in the table from 2020 under the "pounds harvested/deliveries made" column:

*If harvested 1000 pounds or more and made 4 or more deliveries*

Have a great weekend and thank you!

Brett Roth  
F/V Missy

On Friday, May 24, 2024 at 10:46:03 AM AKDT, Haight, Glenn E (CFEC) <[glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)> wrote:

Hello,

We have you as a possible interested party in the attached notice for proposed regulations to limit the PWS fishery. Public comment timelines and instructions are provided in the attachments.

Thank you,

Glenn



Glenn Haight, Commissioner

Alaska Commercial Fisheries Entry Commission

PO Box 110302

Juneau, Alaska 99811

907-790-6942

[glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)



**From:** [Haight, Glenn E \(CFEC\)](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** FW: PWS shrimp limited entry  
**Date:** Friday, June 14, 2024 9:00:18 AM

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-----Original Message-----

**From:** [REDACTED]  
**Sent:** Monday, April 15, 2024 10:16 AM  
**To:** Haight, Glenn E (CFEC) <[glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)>  
**Subject:** PWS shrimp limited entry

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Hello, my name is Gavin Keohane and I've been participating in the shrimp fishery since it's most recent inception in 2013. I've been following the limited entry process and was wondering if my buyers license would qualify for additional points. Although I didn't get a "direct marketer permit" I have maintained a buyers license under my company name 'Alaskan standard seafoods' in order to legally land my shrimp. I've also invested in and operated the only participating tender in the fishery for almost 10 years. This required me to license 2 separate vessels since tenders can't also fish. From what I've seen in the publications there is no pointed awarded for tendering or buying. Is this the case? I feel my participation as a fisher/tender/buyer has proven my dedication and investment in the fishery as much or more than simply obtaining a 'direct marketer permit'. My licensing has helped many others participate in the fishery as I have purchased not only from myself but many other fishermen who were lacking markets while fishing. In doing so I've sacrificed significant fishing time which has made my points received from lbs harvested suffer.

My question is: is there any way I could receive any credit for my obvious unique contribution to the fishery? My investment level is very high and also is my commitment level and dependence on commercial fishing. I've made very many landings where I legally wrote my own tickets just like a direct marketer, I've landed many more for others and I've been a highly reliable source of landing information for JAN RUMBLE who managed the fishery by reporting tender landings on a daily basis.

Sorry for the long winded email, I'm just worried myself, my father, and my cousin will get left out of a fishery we've contributed to and depended on since the beginning because of our particular strategy. If there is anything we can do please let us know, we would love your help in this matter..

Thanks for your time

Gavin Keohane  
Alaskan standard seafoods

**From:** [Haight, Glenn E \(CFEC\)](#)  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** FW: Proposed regulations for the PWS Commercial shrimp pot limitation process  
**Date:** Tuesday, June 11, 2024 8:27:10 AM  
**Attachments:** [image001.png](#)

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**From:** [REDACTED]  
**Sent:** Friday, May 24, 2024 11:23 AM  
**To:** Haight, Glenn E (CFEC) <glenn.haight@alaska.gov>  
**Cc:** DFG, CFEC PublicQuestions (DFG sponsored) <DFG.CFEC.PublicQuestions@alaska.gov>  
**Subject:** Re: Proposed regulations for the PWS Commercial shrimp pot limitation process

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Hi Glenn,

Can you help me with this? This is all regarding the PWS pot fishery limited entry proposal.

I had a shrimp catcher-processor permit sometime in 90-95 for one or more years. However, due to circumstances out of my control, I was never able to catch or process shrimp.

I have had a shrimp catcher permit for the past 3-5 years. However, due to circumstances beyond my control, I was never able to catch any shrimp. I will have minor economic damage if I don't get a permit.

Do you have a record of the years? Will I be able to get a nontransferable permit or, at best, a transferable permit? If so, how will I do that?

**James M. Williams** |  
144 East Egan Drive | PO Box 648, Valdez, AK 99686

On Fri, May 24, 2024 at 11:46 AM Haight, Glenn E (CFEC) <[glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)> wrote:

Hello,

We have you as a possible interested party in the attached notice for proposed regulations to

limit the PWS fishery. Public comment timelines and instructions are provided in the attachments.

Thank you,  
Glenn

Glenn Haight, Commissioner  
Alaska Commercial Fisheries Entry Commission  
PO Box 110302  
Juneau, Alaska 99811  
907-790-6942  
[glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)





CORDOVA DISTRICT  
**FISHERMEN**  
— UNITED —

Alaska Commercial Fisheries Entry Commission  
P.O. Box 110302  
Juneau, Alaska 99811-0302  
[DFG.CFEC.PublicQuestions@alaska.gov](mailto:DFG.CFEC.PublicQuestions@alaska.gov)

July 5, 2024

Dear CFEC Commissioner,

We would like to address the proposed changes in regulations concerning the Prince William Sound commercial shrimp pot fishery. CDFU does not take a stance on the allocative action of this fishery requiring limitation of entry. However should a maximum number of entry permits be defined, we suggest the following changes to the proposed regulations that enhance the equity of the criteria for permit eligibility outlined in the CFEC's proposed amendments to regulation:

**1) Proposed regulation 20 AAC 05.83 - Expand fishery participation eligibility criteria based on previous commercial harvesting from the proposed years of 2019-2022 to 2010-2024 and reflect the entirety of the modern fishery.** There are many variance factors in annual participation to consider, including:

- CFEC did not include the most recent years of 2023-2024 due to the possibility participation increased as a result of the initiation of a limited entry process. However, there does not appear to be a marked increase in participation in 2023 or 2024. Excluding 2023 and 2024 from a sample of participation years diminishes the eligibility of newer fishery entrants who may be the most dependent on the fishery, as they likely have most recently made new business investments into pots and equipment.
- The year 2020 had the most participation in the fishery, not because of the economics of the fishery, but because of Covid-19 lockdowns and layoffs which enabled a large number of participants who typically have day jobs during the season. Many of these participants may be continuing on annually in “weekend warrior” fashion but not have the same economic dependence to the fishery as others.
- The Triannual rotation of open districts impacts participation. Fishermen based in eastern Prince William Sound communities often only participate in one or two years out of every three, due to the distance and run time to the far western districts making participation cost prohibitive.



CORDOVA DISTRICT  
**FISHERMEN**  
— UNITED —

- 2) **Proposed regulation 20 AAC 05.839 - Remove number of deliveries as a metric for awarding points to reach eligibility criteria, in order to reflect that the annual number of deliveries made by a participant in the fishery is not tied to economic dependence on the fishery.** Annual delivery numbers may vary widely for many reasons, for example:
- Boats doing day trips from Whittier will have far more deliveries than boats that stay out for as long as possible.
  - Boats that deliver daily to a tender will have far more deliveries than boats running their own shrimp to port every 3-4 days or more.
  - Boats that split deliveries between processors will have more deliveries than boats that deliver all of their catch to one processor.
  - Boats that direct market only a portion of their catch will have more deliveries than boats that direct market all of their catch.
- 3) **Proposed regulation 20 AAC 05.839 - Replace the number of deliveries as a metric for awarding points to reach eligibility criteria with the number of pot pulls, which indicate actual efforts put forth by a participant and best demonstrate economic dependence on the fishery.** Pot pulls are recorded on each fish ticket alongside days fished.
- A week of around-the-clock participation in the fishery could result in 500 pot pulls and only one or two deliveries.
  - A weekend of participation made of two or three day-trips in the fishery could result in 100 pot pulls and three deliveries.

Thank you for the opportunity to provide comments on the proposed regulations. Please do not hesitate to reach out with any questions or expanded comments.

Sincerely,

Jess Rude  
Executive Director

**From:** [REDACTED]  
**To:** [DFG, CFEC PublicQuestions \(DFG sponsored\)](#)  
**Subject:** Limited Entry Clarification  
**Date:** Monday, July 8, 2024 12:05:36 PM

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Also, at the March 26, 2024, public hearing, one question to the draft proposed regulations presented at the time was how to interpret a subsection under 20 AAC 05.839(b)(1). That subsection provides a table that indicates points allowed if applicants harvested a certain level of pounds in a given year and made a certain number of deliveries. The lead-in language to the table in the subsection reads: "the commission will award a maximum of 16 points to an applicant for consistent participation based on a minimum number of pounds harvested or a minimum number of deliveries made in a year...". It is the intent of the Commission in drafting the proposed regulations to have the points awarded based on having met both the harvested pound and delivery threshold in that single year. Further comments by the interested public on this clarification are appreciated.

During March 26th public meeting the question was asked to clarify the language in the table mentioned above. The time stamp on the recorded meeting is 00:43:57 through 00:45:30. The verbal answer given was the written language is "or" with the intent of being double checked. On 5/24/24 the Final Draft of LE was issued with changes made to several items discussed during the 3/26/24 meeting, no changes or clarification were made to the introductory language or the table as described above. On 7/3/24 the above clarification was issued 6 days before the public comment period is to close.

The section in question is worth 16 points, approximately 21% of the overall point value for the Limited Entry Application. For the past 3+ months we have all been left with the answer being "or". All of my actions and conversations have been based on the clarification made during the 3/26/24 meeting. Reclarifying the intent of the language after the Final Draft was issued on 5/24/24 is very impactful and the wording "or" should remain as it was clarified on 3-26-24 and never publicly mentioned until 7/3/24/24.

Thank You,

Doug Frasher