



February 19, 2018

Alaska Department of Fish and Game
Boards Support Section
Attn: Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Members of the Board of Fisheries:

Please find below written comments from Cordova District Fishermen United regarding the upcoming Statewide Board of Fisheries meeting proposals to be discussed in Anchorage, AK on March 6-9, 2018. Please don't hesitate to contact CDFU with any questions whatsoever. Thank you for your consideration.

PROPOSAL 206
OPPOSE

CDFU opposes the establishment of a sport fishery without also establishing a commercial fishery. Because ADF&G believes there to be a harvestable surplus of octopus that has risen to a level in which an octopus sports fishery can be established, CDFU maintains that both sports and commercial fisheries should be established in order benefit both user groups. CDFU would support this proposal if it were amended to include both sport and commercial fisheries.

PROPOSAL 216
SUPPORT

The Prince William Sound non-commercial spot prawn fishery often exceeds its GHL; therefore, CDFU supports the intent of any management mechanisms available to the Department in order to avoid exceeding the GHL of the spot prawn fishery in Prince William Sound. We ask that the Board of Fisheries implement the additional tools that management clearly needs in order to avoid repeated excess harvest above the GHL.



PROPOSAL 217
OPPOSE

There is currently a surplus of octopus in Prince William Sound and the GHL has not been met in recent years. CDFU supports the implementation of both a sports and commercial octopus fishery. However, the gear modifications and allowances implied in this proposal are ambiguous and must be vetted. This proposal is attempting to include allowances for octopus gear within the shrimp fishery. CDFU maintains that the Board of Fisheries must establish a targeted sports and commercial octopus fishery with its own gear specifications rather than modifying the specifications of an existing shrimp fishery. Additionally, this proposal would complicate enforcement.

PROPOSAL 218
OPPOSE

CDFU opposes Proposal 218 because it is allocative and preferential to a certain group of people and would restrict opportunity. This proposed start date modification would effectively preclude any commercial salmon fishermen from accessing the Prince William Sound commercial shrimp pot fishing season. Due to the traditional start of the Copper River salmon run in early May, this proposal excludes an entire user group and group of Alaskans from engaging in this harvest. Historically this fishery opened in January each year. CDFU requests that this fishery continues to begin in April, ideally by April 1, in order to decrease conflict between the sports and commercial user groups.

PROPOSAL 219
OPPOSE

CDFU opposes Proposal 219 because it is allocative and preferential to a certain group of people and would restrict opportunity. This proposed start date modification would effectively preclude any commercial salmon fishermen from accessing the Prince William Sound commercial shrimp pot fishing season. Due to the traditional start of the Copper River salmon run in early May, this proposal excludes an entire user group and group of Alaskans from engaging in this harvest. Historically this fishery opened in January each year. CDFU requests that this fishery continues to begin in April, ideally by April 1, and continue to close in mid-September.



**PROPOSAL 223
SUPPORT**

CDFU supports Proposal 223. The burden of conservation has long been placed upon the commercial shrimp fishery due to the fact that whenever the shrimp biomass is low, the commercial shrimp fishery is closed but the sports shrimp fishery remains open. The sport shrimp fishery harvests the majority of the shrimp each year; consequently, the burden should be shared equally amongst user groups in order to foster long-term sustainability.

**PROPOSAL 224
SUPPORT**

CDFU supports Proposal 224, but specifically supports Option B within this proposal. In times of low abundance, both sports and commercial fisheries should be closed in order to share the burden of conservation and expedite the recovery of the stocks.

**PROPOSAL 225
SUPPORT**

CDFU supports fair and equal access to the shrimp resource amongst user groups in Prince William Sound.

**PROPOSAL 227
OPPOSE**

The GHL in this fishery has not been met in recent years. Therefore, there is no reason to limit opportunity for all fishermen, but specifically fishermen who engage in salmon fisheries during the summer trawl season.



Sincerely,

Jerry McCune

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