

Evaluation of Limited Entry Standards for the Prince William Sound Shrimp Pot Fisheries

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Abstract

This report evaluates whether entry should be limited in the Prince William Sound commercial shrimp pot fishery under Alaska Statute 16.43. The Commercial Fisheries Entry Commission initiated the review after receiving a January 2026 petition from the ShrimpPros Association. The analysis considers three indicators: trends in participation, harvest relative to guideline harvest levels, and estimated average gross earnings. It examines P09E permits and P91E permits, focusing on the period following the fishery's reopening in 2010. Earnings are reported in 2026 dollars.

The results do not provide compelling evidence that entry limitation is necessary. The number of fishable P09E permits did not increase significantly, although the proportion recording landings increased, indicating greater use of existing permits rather than growth in available permits. For P91E, the number of fishable permits and participation has been so low that no meaningful analysis is possible. Total commercial harvest remained closely aligned with established guideline harvest levels. From 2017 through 2023, annual harvest was within 3 percent of the GHL, and harvest remained below the GHL in 2024 and 2025. Estimated average gross earnings showed no consistent trend for P09E permits.

Recent reductions in the GHL and the 2026 closure appear attributable to changes in shrimp abundance and biological productivity, not excessive commercial participation or overharvest. Limiting entry would therefore not directly address the principal cause of reduced fishing opportunity. Because the revised harvest-control framework was first implemented in 2025, additional years of information are needed to assess its long-term effects. The report recommends against limiting entry at this time and supports continued monitoring of participation, harvest, earnings, and stock performance, with reconsideration if future evidence demonstrates management problems or economic harm attributable to excessive fishing capacity.

Prepared by Madison Bargas and Reid Johnson

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Introduction

On January 28, 2026, the Commercial Fisheries Entry Commission (CFEC) received a petition from the ShrimpPros Association (Appendix A) to limit entry into the Prince William Sound (PWS) commercial shrimp pot fishery (permit types P09E and P91E). The petition was submitted by ShrimpPros Chairman Brett Wilbanks and Vice Chairman Bruce Bowman shortly after the PWS shellfish meeting. It was the second petition CFEC had received in recent years seeking limitation of the fishery.

The petition filed by ShrimpPros argues that the commercial guideline harvest level declined from 70,000 pounds in 2021 to 32,258 pounds in 2025 while participation remained relatively stable, reducing estimated average gross value per participating permit from \$11,495 to \$5,632. The association maintains that this represents economic distress under the Alaska Constitution and AS 16.43.010. The petition also cited support for limitation from 70.6% of surveyed permit holders and contends that recent conservation measures do not address the economic effects of dividing a declining commercial allocation among existing participants.

In its supporting position paper and addendum, ShrimpPros further argues that open entry and personal-use harvest under commercial permits dilute returns to established commercial operators. The association cites the 2026 commercial closure following record-low survey catch rates as evidence that the fishery's economic condition has worsened. ShrimpPros further urges CFEC to establish a limited-entry program before the fishery recovers, using participation during the 2016–2021 operating period (approximately 63 - 67 permits) as the basis for determining the appropriate maximum number of permits and protecting fishermen with demonstrated commercial participation.

The CFEC commissioners denied the petition within the required 30-day response period but indicated that the matter warranted further examination. The commissioners subsequently directed CFEC research staff to evaluate the three principal criteria used to determine whether limiting entry into a commercial fishery may be necessary. Because the statutory response period did not provide sufficient time for a comprehensive analysis, the initial denial did not represent the results of a complete investigation.

This report presents the results of the CFEC Research Section's investigation into whether limitation of the PWS commercial shrimp pot fishery is warranted.

Alaska Statute 16.43 provides that entry into a fishery may be limited when necessary to promote conservation of the resource, facilitate sustained-yield management, or support the economic health and stability of the fishery. Limitation does not require that all three conditions be present. A finding under any one criterion, or a combination of criteria, may provide a basis for limiting entry.

CFEC's authority to limit entry derives from Article VIII, section 15 of the Alaska Constitution and AS 16.43.010. Because limited entry permanently restricts access to a common-property resource, it is an extraordinary regulatory action. A decision to limit entry must be supported by substantial evidence that one or more statutory purposes are implicated, that limitation would meaningfully address the identified problem, and that the action is consistent with conservation and the public interest. CFEC therefore considers the causal relationship between unrestricted entry and the conditions documented in the fishery, as well as whether existing or less restrictive management measures can adequately address those conditions.

CFEC research staff generally evaluate three primary measures when considering whether limitation may be appropriate:

1. Participation: Has the number of participants increased, decreased, or remained stable in recent years? A sustained increase in participation may indicate that limitation should be considered before the fishery becomes economically unsustainable or increasingly difficult to manage.
2. Harvest: Has harvest remained at, above, or below established guideline harvest levels (GHLs)? Have available allocations generally been achieved? Harvest that frequently exceeds established GHLs may indicate increasing pressure on the fishery resource or challenges for effective management.
3. Earnings: Have average gross earnings in the fishery increased, decreased, or remained stable over time? A sustained decline in average gross earnings may indicate deterioration in the economic health and viability of the fishery.

In addition to examining these measures, it is necessary to determine whether limiting entry would meaningfully address the identified problems. Limiting the number of participants would provide little benefit if declining earnings were caused primarily by reduced market demand rather than excessive participation. Commercial herring fisheries provide one example. Although many herring fisheries are limited, they have experienced diminishing returns as international markets have fundamentally changed. Reductions in the number of herring permit holders would not restore markets that no longer exist.

This report summarizes the historical trends and current status of the PWS commercial shrimp pot fishery permit types P09E and P91E. It examines GHLs, changes in participation and harvest, and estimated average gross earnings to evaluate the three limitation criteria described above. The report also summarizes recent changes in Alaska Department of Fish and Game (ADF&G) management practices, including the adoption of new population-dynamics models, recent changes in GHLs, and the reasons those harvest levels have changed.

The analysis finds that, although the GHL has decreased, average gross earnings have remained relatively stable in years when the fishery was prosecuted, participation has remained stable, and the reduction in the GHL reflects circumstances that would not be resolved by limiting entry.

All dollar amounts are reported in inflation-adjusted 2026 dollars.

Historical Background

Commercial shrimp fishing has occurred in Prince William Sound (PWS) since at least the 1960s. The fishery harvests both spot shrimp (*Pandalus platyceros*) and coonstripe shrimp (*Pandalus hypsinotus*), although spot shrimp account for most of the commercial harvest by weight.

Commercial participation and harvest generally expanded from the 1960s through the mid-1980s. That growth was followed by a pronounced decline in production. Annual harvest fell from more than 200,000 pounds during the 1980s to fewer than 18,000 pounds in 1991. The fishery was subsequently closed in 1992. During the 1990s, the Alaska Board of Fisheries (BOF) adopted changes intended to

improve management of the resource, but shrimp abundance remained insufficient to support a commercial opening for nearly two decades.

The commercial fishery reopened in 2010 under a more conservative management framework. This approach was designed to prevent the recurrence of the rapid expansion and subsequent stock decline that characterized the earlier fishery. Since reopening, management has emphasized controlled fishing effort and harvest levels intended to protect the shrimp population while allowing an orderly commercial fishery.

Management

The PWS shrimp pot fishery is managed through a fixed-exploitation-rate system. Under this framework, annual guideline harvest levels (GHLs) are established for commercial and noncommercial users. Alaska Department of Fish and Game (ADF&G) managers are responsible for structuring and monitoring the commercial season so that harvest approaches, but does not exceed, the applicable GHL.

Two permit types authorize participation in the commercial fishery. The P09E permit applies to vessels less than 60 feet in length, while the P91E permit applies to vessels 60 feet or longer. Although the permit types are distinguished by vessel length, both operate within the same fishery and are generally subject to the same management requirements.

Commercial vessels must register with ADF&G before participating. The allowable number of pots per vessel is then established after managers determine how many vessels intend to fish during the season. Pot limits may therefore vary with participation. This system allows managers to regulate total fishing effort, conduct the season in an orderly manner, and reduce the likelihood that the commercial GHL will be exceeded. Since the fishery reopened in 2010, these controls have generally kept commercial harvest within the established GHL. In years when harvest exceeded the GHL, the overage was relatively small.

PWS also supports substantial noncommercial shrimp fisheries, including sport and subsistence harvest. Noncommercial permit holders may generally operate no more than three pots, although in recent years the pot limit has been reduced to two pots. Managing these fisheries is more difficult because participation is both high and variable from year to year. Consequently, noncommercial harvest has exceeded its allocated GHL in some years, occasionally by a substantial amount¹.

Crossover Participation

The petition reiterates concerns regarding personal-use-only activity under commercial permits. The Commission previously examined this issue². While that report noted that approximately 5,000 pounds of shrimp were harvested annually for personal use under commercial permits, it also indicated that roughly 80% of that harvest was taken by individuals who also participated in the commercial fishery in a substantial way. The fish ticket records further reflect that those with the largest personal-use harvests are generally the same individuals who account for the highest levels of commercial harvest, suggesting that personal-use activity is concentrated among active commercial participants rather than

¹Schuster et al., 2025

²Johnson, 2024

among non-commercial entrants. Limiting entry into the fishery would not substantially alter the amount of personal use shrimp harvested by commercial permit holders.

CFEC does not maintain records of sport or subsistence shrimp harvest, as permitting and tracking of those fisheries is not within the Commission's statutory authority. Further, limitation of entry into the commercial fishery would not alter subsistence or sport harvest levels, nor would it meaningfully reduce personal use of shrimp taken under commercial permits. Allocation between commercial and non-commercial sectors is determined through the Board of Fisheries process. Concerns regarding allocation equity, harvest reporting, or sector interaction are more appropriately addressed through Board regulatory mechanisms rather than through permanent limitation of entry.

Recent Changes to Management Framework

The commercial guideline harvest level (GHL) has declined in recent years³, and the commercial fishery was closed in 2026. The available record does not indicate that these developments resulted from excessive participation or commercial overharvest. Rather, the reductions appear to reflect declining shrimp biomass, lower survey catch per unit effort (CPUE), and broader changes in stock productivity. These biological conditions would not be corrected by limiting the number of commercial participants⁴. When the commercial GHL is set at zero, reducing the number of permits cannot create additional harvest opportunity or increase participant earnings.

The distinction between the previous and current biomass models is important when interpreting the recent decline. The previous model used to estimate biomass was not sensitive to changes in survey CPUE. Consequently, declining survey CPUE was not fully reflected in the biomass estimates produced under that model. The revised model is responsive to changes in survey CPUE and therefore provides a more direct indication of changes in shrimp abundance and productivity⁵.

Until the most recent Alaska Board of Fisheries cycle, a commercial season could occur only when at least 110,000 pounds of harvestable surplus were available. In 2025, the Board replaced that fixed threshold with a revised surplus-production model and associated harvest-control framework. Under the new approach, commercial harvest may be authorized when estimated shrimp biomass is at or above 40 percent of carrying capacity⁶.

The revised framework incorporates substantially more biological information than the previous threshold-based approach and is intended to better align harvest opportunity with current stock conditions and productivity. The 2025 season was the first and only commercial season managed under the revised framework. Accordingly, there is not yet sufficient record to determine how the framework will perform across a range of biomass and productivity conditions.

A single season provides limited information about future harvest opportunities, long-term economic performance, or the potential need for entry limitation. Several additional years of implementation will be necessary before reliable conclusions can be drawn about the revised model's effects on commercial harvest levels and fishery stability.

³Schuster et al., 2026

⁴Schuster & Arthur, 2025

⁵Schuster & Blain, 2025

⁶Alaska Department of Fish and Game, 2025

Shrimp population dynamics also complicate direct comparisons between biomass and sustainable harvest. Shrimp growth and production are density dependent, meaning that increases in total biomass do not necessarily produce proportional increases in harvestable surplus. At relatively high abundance, competition for habitat and food may reduce individual growth and overall stock productivity. Conversely, a smaller population may, under some conditions, produce a greater sustainable yield.

Taken together, the declining survey CPUE, the revised model's greater sensitivity to that decline, and the density-dependent nature of shrimp production indicate that recent GHL reductions and the 2026 closure are best understood as responses to changing stock conditions and productivity, not as evidence of excessive participation or structural overcapacity in the commercial fishery.

Analysis of Statutory Standards for Limitation

The following evaluates whether current conditions in the Prince William Sound commercial shrimp pot fishery meet the statutory standards required for limitation. To do so, we examine trends in the number of fishable permits, participation rates, total commercial harvest, and estimated average gross earnings since the fishery reopened in 2010. The analysis relies on historical data, correlation tests, and management context provided by ADF&G to determine whether participation or harvest patterns demonstrate increasing pressure on the resource or whether observed changes are primarily driven by other mechanisms.

Historical changes in the number of fishable permits and participation rate

Figure 2.1 shows the number of fishable P09E and P91E permits issued from 2010-2025. A fishable permit is a permit with an embossed permit card. Since the PWS commercial shrimp pot fishery reopened in 2010, the number of fishable permits has averaged 138 for P09E and 3 for P91E. The number of fishable permits for P09E was 188 in 2010 and 110 in 2025. The number of fishable permits for P91E was 9 in 2010 and 2 in 2025.

Figure 2.2 shows the changes over time in the percentage of fishable P09E permits that recorded landings. Over 2010-2025, the percentage of fishable permits with landings averaged 35% for P09E permits. The percentage of fishable permits with landings for P09E was 37% in 2010 and 49% in 2025. The percentage of fishable permits with landings for P91E has been confidential in all years.

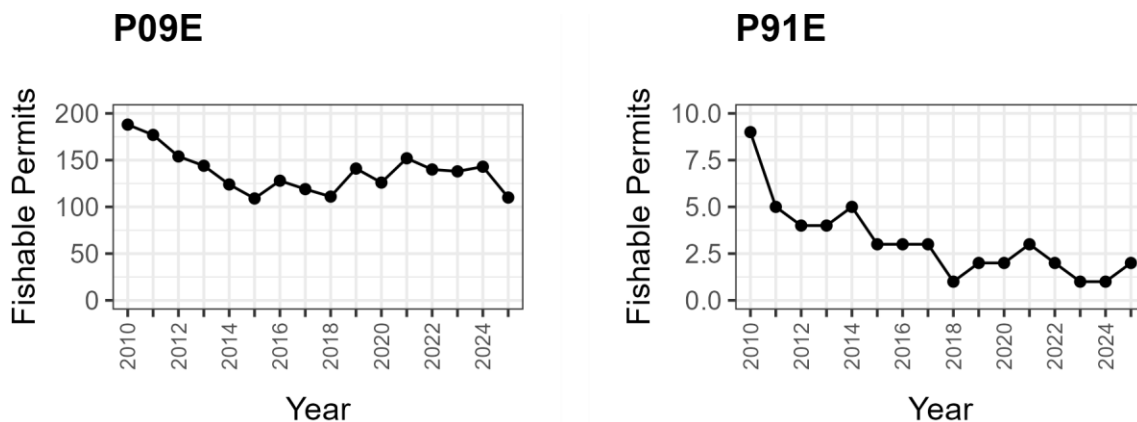


Figure 2.1: Number of fishable permits

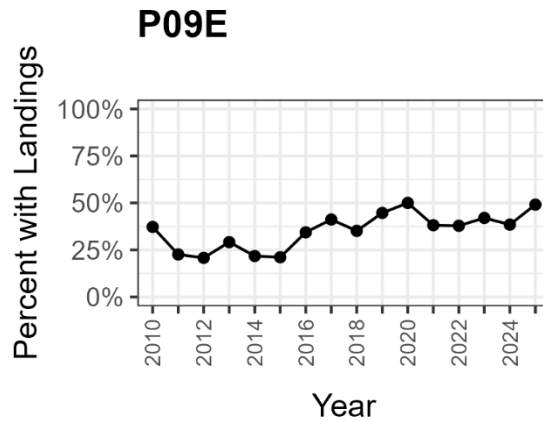


Figure 2.2: Participation rate (the percentage of fishable permits with recorded landings).

Is participation increasing, decreasing, or remaining stable?

To address this question, we first truncated the data set to include only years after the PWS commercial shrimp pot fishery re-opened in 2010, in order to capture the recent trends in the fishery. Due to the closure, 2026 was not included in this analysis, it is not appropriate to treat a closure which enforces zero participation that same as years when individuals can freely participate. We then calculated the Spearman's rank correlation coefficient for the relationship between year and the number of fishable permits, as well as the relationship between year and the proportion of fishable permits that reported landings.

For the P09E permit type, the number of fishable permits had a negative association with year that was not statistically significant (Spearman's $\rho = -0.39$, $p = 0.13$). The number of permits fished each year appears to be increasing, but that relationship is also not statistically significant (Spearman's $\rho = 0.41$, $p = 0.11$). The proportion of permits with landings showed a strong positive association with year and was statistically significant (Spearman's $\rho = 0.74$, $p = 0.0$). The proportion of permits participating has increased over time for the P09E permit type.

Although the number of fishable P09E permits has declined since 2010, the number actually fished each year has not changed significantly. Consequently, the increasing participation rate appears to reflect a smaller pool of fishable permits rather than growth in the number of permits actively fished.

For the P91E permit type, the number of participants is too low for any meaningful analysis to take place, and participation has been confidential in all years.

Harvest

Historical changes in harvest

Figure 3.1 shows the changes over time in the total annual pounds of commercial shrimp harvested for the combined P09E and P91E permit types. Commercial harvest does not include shrimp kept for personal use, diseased shrimp, or confiscated shrimp.

Since the PWS commercial shrimp pot fishery re-opened in 2010, total annual harvest averaged 49,251 pounds, with a low of 18,900 pounds in 2012, and a high of 66,100 pounds in 2021. No harvest took place in 2026 due to the fishery closure.

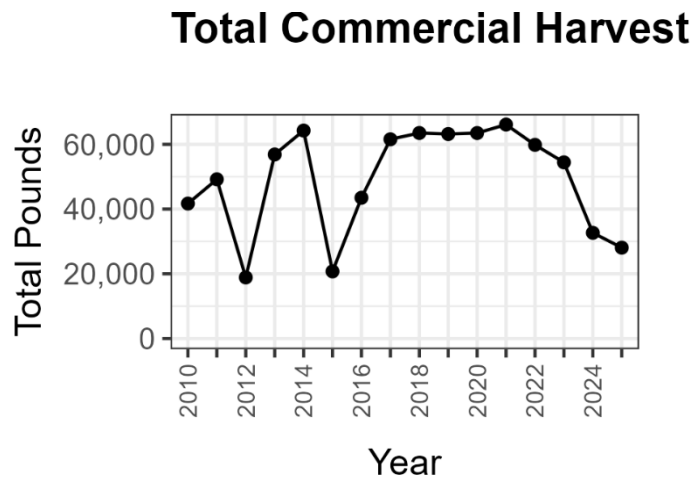


Figure 3.1: Total Annual Commercial Pounds Harvested

Guideline Harvest Level

Over the period 2010-2025, harvest was usually near the Guideline Harvest Level (GHL) (Table 1). Since 2010, the GHL has not been exceeded by more than 3% in any given year. The fishery is closed for 2026 because the population is below the threshold needed for prosecution of a commercial fishery according to management guidelines ⁷.

⁶Alaska Department of Fish and Game, 2026

Year	GHL (lbs)	Total harvest (lbs)	% of GHL harvested
2010	55,000	45,349	82%
2011	52,760	52,550	100%
2012	51,240	21,561	42%
2013	66,300	61,644	93%
2014	66,600	68,464	103%
2015	67,000	23,138	35%
2016	47,061	48,423	103%
2017	67,000	67,421	101%
2018	67,200	67,375	100%
2019	68,100	68,947	101%
2020	68,100	69,898	103%
2021	70,000	70,168	100%
2022	66,900	65,872	98%
2023	63,100	62,260	99%
2024	46,809	34,269	70%
2025	32,258	30,163	94%

Table 1: Prince William Sound Shrimp Harvest 2010 – 2025.

Is harvest increasing, decreasing, or remaining stable?

As in the participation section, we truncated the data set to include only years after the PWS commercial shrimp pot fishery re-opened in 2010, in order to capture the recent trends in the fishery. We then calculated the Spearman’s rank correlation coefficient for the relationship between the year and the total number of commercial pounds harvested by participants.

The closure of the fishery in 2026 complicates interpretation. Whether it is appropriate to include the 2026 harvest value of zero is debatable. In general, fisheries closed due to management guidelines should not be evaluated as if they were open. However, because the closure itself is relevant to understanding recent conditions in the fishery, we examined the data both ways: once including a 2026 harvest of zero, and once using only information through 2025. Normally, 2026 harvest information would not be available until well into the year.

When only open years (2010–2025) are analyzed, the total number of pounds harvested shows a weak positive and statistically non-significant association with year (Spearman’s $\rho = 0.15$, $p = 0.59$). This indicates no evidence of a meaningful change upward or downward in harvested pounds over time.

When 2026 (with a harvest of zero) is included, the association between year and pounds harvested becomes very close to zero and remains statistically non-significant (Spearman’s $\rho = -0.04$, $p = 0.87$). This confirms that including the closure year does not materially alter the conclusion: harvest levels show no significant trend over time.

While harvest levels since the start of the fishery have not trended up or down, they have declined since 2021. According to ADF&G management biologists, this recent decrease reflects reduced stock

productivity rather than increased fishing pressure. Throughout this period, ADF&G has maintained harvests within the Guideline Harvest Level (GHL), and the GHL has not been exceeded. Alaska statutes make clear that limiting a fishery is appropriate when needed for the conservation of the resource; however, because the GHL has consistently been met without exceedance, no resource-conservation concerns are triggered. Consequently, it would not be appropriate to limit the fishery on the basis of overharvest or excessive participation when reduced harvests are driven by lower stock productivity rather than fishing effort.

Historical changes in estimated average gross earnings

Figure 4 shows the changes over time in the estimated average annual gross earnings per permit holder with landings for P09E permits. Earnings in the P91E fishery are confidential.

Since the PWS commercial shrimp pot fishery re-opened in 2010, estimated annual gross earnings averaged \$8,587. Mean estimated annual gross earnings for P09E permit holders with landings were \$3,596 in 2010 and \$5,378 in 2025. In 2026 the fishery was closed and no harvest took place.

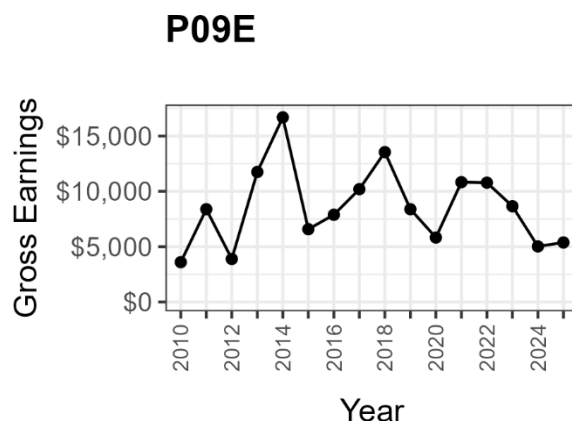


Figure 4: Estimated Average Gross Earnings

Are estimated average gross earnings increasing, decreasing, or remaining stable?

As in the participation and harvest sections, we truncated the data set to include only years after the PWS commercial shrimp pot fishery re-opened in 2010, in order to capture the recent trends in the fishery. We then calculated the Spearman's rank correlation coefficient for the relationship between year and estimated average gross earnings.

For the P09E permit type, estimated average gross earnings showed no strong association with year (2010 – 2026) and was not statistically significant (Spearman's $\rho = -0.125$, $p = 0.63$). Earnings in the P91E fishery are confidential in all years, and participation is too low for any meaningful analysis to take place.

It is true that the fishery was closed in 2026, however this closure was due to an underlying change in stock productivity, not due to increasing participation, limitation of participation would not fix this problem.

The decline in per-permit earnings observed between 2021 and 2025 should be interpreted in the context of the fishery's biological variability and relatively short post-reopening history. The current commercial fishery has operated for approximately 15 years, during which earnings have fluctuated with changes in stock productivity and available harvest. The earnings recorded from 2021 through 2025 fall within the range observed since the fishery reopened in 2010; neither the highest nor the lowest estimated average gross earnings occurred during that period.

The fishery closure makes interpretation of estimated earnings for 2026 inherently different from other years. A value of zero in 2026 does not represent economic performance or participant behavior; it reflects a management-driven closure due to biological conditions. The 2026 fishing season was included in this analysis, but we stress that this likely distorts the relationship between participation and earnings. We recommend caution when interpreting the 2026 seasons evidence of an economic trend.

The available evidence therefore indicates that recent reductions in per-permit earnings are primarily attributable to declining GHs and reduced harvest opportunity rather than a substantial increase in participation. The causal relationship reflected in the data runs from stock condition to available harvest and then to participant earnings, not from entry levels to stock condition or economic performance.

Nonstatutory Petition Arguments

ShrimpPros raises several arguments that, while relevant to the broader policy discussion, do not independently establish that entry limitation is warranted under the statutory standards already addressed above. For example, ShrimpPros points to reported fleet support for limitation. Although that position may reflect genuine concern within the fleet, popularity alone does not satisfy the statutory criteria for limitation. The Commission must base its decision on the evidence relevant to conservation, sustained yield management, and economic health and stability.

ShrimpPros also relies on historical statements attributed to Governor Egan regarding shrimp fisheries and limited entry. Those statements provide useful historical context for the development of Alaska's limited entry laws, but they do not replace the need for a current, fishery-specific statutory showing. The present decision must rest on the conditions that exist in the fishery now, not on general predictions made decades ago.

The petition and addendum further argue that current earnings are economically distressed, that noncommercial harvest has exceeded its allocation in several years, and that crossover participation is eroding commercial viability. The report recognizes concerns regarding crossover participation and allocation pressure, but these issues do not appear to be the principal cause of the recent changes in the fishery. Moreover, many of these concerns, such as sport and subsistence harvest, are wholly outside CFEC's statutory authority to address. The more direct drivers of reduced opportunity are declining shrimp abundance, lower guideline harvest levels, and the 2026 closure. In addition, allocation issues between commercial and noncommercial sectors are more appropriately addressed through the Board of Fisheries process than through permanent limitation of entry.

ShrimpPros describes the fleet as being composed largely of mature and experienced participants, while at the same time decrying the number of one-year participants. Those points do not fully align: a mature fleet suggests stability and retention, while a large number of one-year participants suggests turnover and limited long-term attachment. Limited entry does not exist to shield participants from

ordinary market competition or the fact that others may choose to fish the same fishery. That is not, by itself, a statutory basis for limiting entry.

ShrimpPros also argues that the fishery has a mature fleet with relatively few new entrants, that CFEC has already developed a limited-entry framework, and that the 2026 closure is the changed circumstance that should trigger action now. These points may be relevant to future policy discussions, but they do not themselves establish that limitation is necessary at this time. A developed framework does not substitute for the required statutory finding, and the 2026 closure reflects changing stock conditions and management responses rather than evidence that limiting entry would meaningfully resolve the underlying biological causes of reduced harvest opportunity.

Conclusion and Recommendation

The report's analysis of participation, harvest, and estimated average gross earnings does not provide compelling evidence that entry into the Prince William Sound commercial shrimp pot fishery should be limited at this time.

With respect to participation, the number of fishable permits has not shown sustained growth. Participation in the P91E fishery remains low, and is confidential in all years, as is harvest. For P09E permits, there is no evidence that the number of fishable permits is increasing, although the proportion of permit holders recording landings has increased. Thus, the principal change in the P09E fishery is not an increase in available permits but a larger proportion of permits being used when few permits are issued overall.

With respect to harvest, there is no strong evidence that harvests are changing substantially over time. Total commercial harvest has remained closely aligned with the guideline harvest level. From 2017 through 2023, annual harvest was within 3 percent of the GHIL, and harvest remained below the GHIL in both 2024 and 2025. The existing management system, which adjusts vessel pot limits according to anticipated participation, has therefore been effective in controlling commercial fishing effort and preventing substantial GHIL overages. Changes in harvest are primarily a concern if GHIL is being consistently exceeded, which is not occurring in this fishery.

With respect to economic performance, estimated average gross earnings for P09E permit holders have not followed a consistent long-term trend. Recent years have been neither the highest nor the lowest on record, and it would be inappropriate to treat 2026, when the fishery was closed under new management guidelines and a revised management paradigm, as representative of long-term performance. Management biologists have made clear that the closure reflected changing productive capacity and an improved understanding of the population dynamics governing the shrimp surplus available for harvest.

The 2026 fishery closure was not a result of excessive commercial participation or harvest. Limiting the number of participants would not directly correct those biological conditions. In addition, because the revised harvest-control framework was first implemented in 2025, there is not yet enough information to determine how it will perform under varying stock conditions.

Accordingly, this analysis does not recommend limitation of the PWS commercial shrimp pot fishery at this time. CFEC should continue monitoring the number of permits recording landings, harvest relative to the GHIL, average gross earnings, and stock performance under the revised management framework. The number of fishable permits vs the proportion of permits recording landings should

be continuously evaluated to track participation. Monitoring both the recreational and commercial fisheries as best as possible with continued data collection would be valuable to better understand fishery crossover, but ultimately recreational fisheries are outside CFEC scope and authority, and CFEC does not have access to sport or subsistence permit records. Entry limitation should be reconsidered if future data demonstrate one of the following:

1. Sustained growth in active participation that impairs effective management;
2. Repeated and/or substantial commercial GHL overages;
3. A persistent decline in earnings attributable to excessive fishing capacity which could be solved by limited entry, rather than biological conditions or market forces causing a decline that cannot be remedied through limitation.

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Appendix A: Petition Letter

SHRIMPPROS ASSOCIATION

Representing Prince William Sound Commercial Shrimp Fishermen

January 28, 2026

Commercial Fisheries Entry Commission

P.O. Box 110302

Juneau, Alaska 99811-0302

RE: Petition for Limitation of Entry Prince William Sound Shrimp Pot Fisheries (P09E / P91E) Submitted pursuant to AS 44.62.220

Dear Commissioners:

On behalf of the ShrimpPros Association and the commercial shrimp fishing fleet of Prince William Sound, we are pleased to submit the enclosed petition requesting that the Commission initiate proceedings to limit entry into the Prince William Sound shrimp pot fisheries.

As you know, the Commission's July 31, 2024 letter encouraged us to re-petition if "concerns remain that the fishery's continued growth is detrimental to its economic health." Those concerns not only remain—they have intensified dramatically.

CHANGED CIRCUMSTANCES SINCE JULY 2024

Since the Commission's decision, the commercial fishery has experienced an accelerating economic crisis:

- Commercial GHL collapsed from 46,809 lbs (2024) to 32,258 lbs (2025)
- Per-permit gross value fell to \$5,632—below economic viability
- Participation remained stable at 63 permits despite the 54% GHL decline
- Non-commercial harvest exceeded GHL for the 9th and 10th times in 16 years

2025 BOARD OF FISHERIES REFORMS

The 2025 Board of Fisheries cycle achieved two significant conservation reforms through commercial fleet advocacy:

1. The inequitable 110,000 lb TAH threshold was replaced with a surplus production model ensuring commercial access at any sustainable TAH level
2. The May 1 season start was codified to protect egg-bearing females

These victories demonstrate that well-reasoned proposals succeed. However, they address conservation—not economic viability. Only limitation of entry can ensure the declining commercial allocation supports viable commercial operations.

THE CASE FOR LIMITATION

- Constitutional authority under Article VIII, Section 15 to prevent economic distress among fishermen
- Statutory mandate under AS 16.43.010 to promote both conservation AND economic health of commercial fishing
- Governor Egan's 1973 prediction that shrimp fisheries would need limited entry
- Fleet support of 70.6% for limitation (CFEC survey, 2023)
- A mature fleet where 57% have 5+ years experience and only 8.2% were new entrants last year (2025)

OUR REQUEST

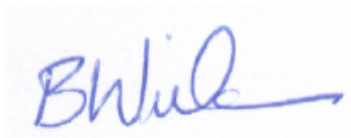
We respectfully request that the Commission:

1. Accept this petition pursuant to AS 44.62.220
2. Direct the Research Section to update its analysis
3. Schedule public meetings to receive testimony
4. Initiate rulemaking proceedings to limit entry

The economic distress threshold referenced in the Alaska Constitution has been reached. We urge the Commission to act before declining per-permit returns drive committed commercial fishers from this fishery entirely.

Thank you for your consideration. We look forward to working with the Commission through the petition process.

Respectfully submitted,



Brett Wilbanks, Chairman
ShrimpPros Association



Bruce Bowman, Vice Chairman
ShrimpPros Association

Enc: ShrimpPros Limited Entry Position Paper 2026.pdf