



UNGUIDED HALIBUT RENTAL VESSELS

Initial Review

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DEFINITIONS

Recreational = sport

Unguided
(non-guided,
non-charter)

Charter
(guided)

Unguided angler
on a **rental**
vessel

Unguided angler
on a **private**
vessel

HISTORY OF ACTION, p12

June 2017

- Council requested a discussion paper that would provide a definition of a self-guided rental boat and mechanisms to create a registration

December 2017

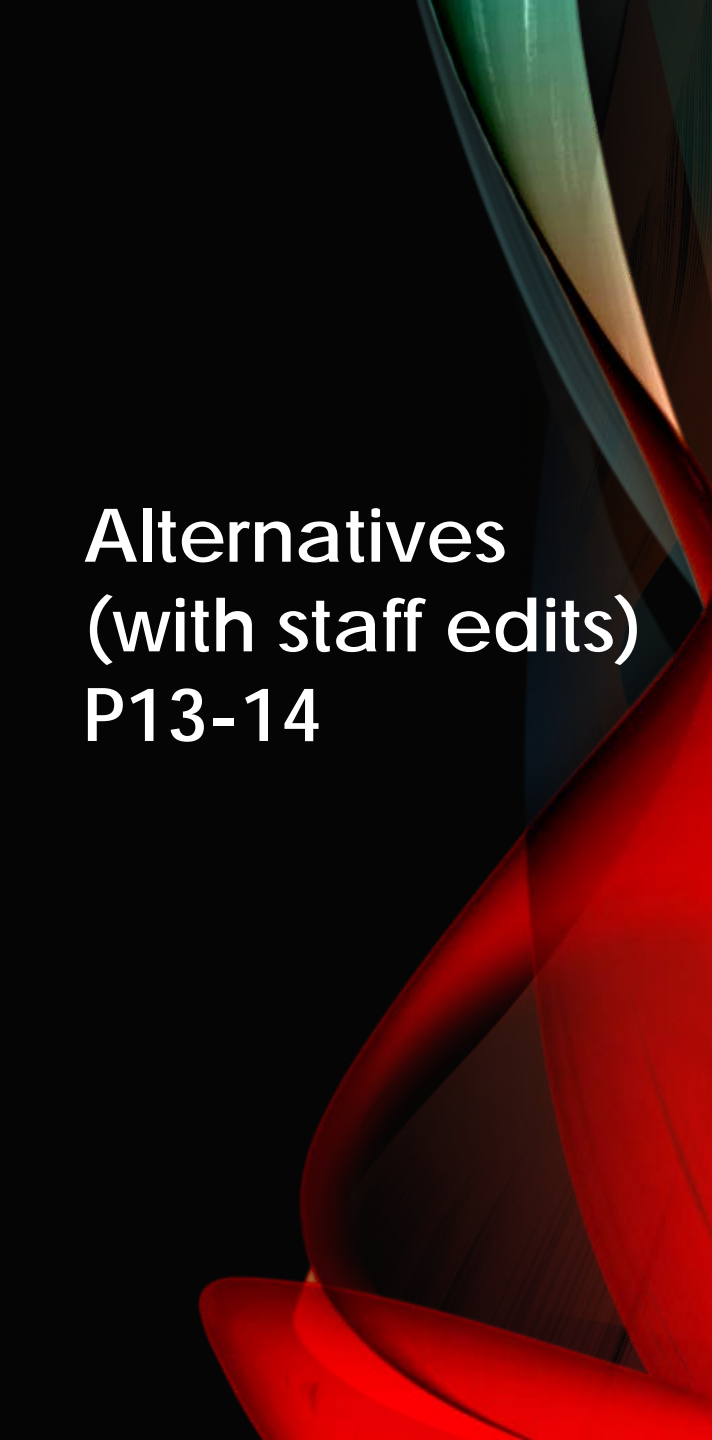
- Council reviewed above discussion paper
- Council requested expanded discussion paper to explore mechanisms to create a registry for motorized rental boats used by unguided anglers to harvest halibut in IPHC Regulatory Areas 2C and 3A

October 2018

- Council reviewed expanded discussion paper with overview of existing vessel registration programs, patterns in halibut harvest in unguided and charter sectors
- Council initiated analysis of alternatives

PURPOSE AND NEED, p12

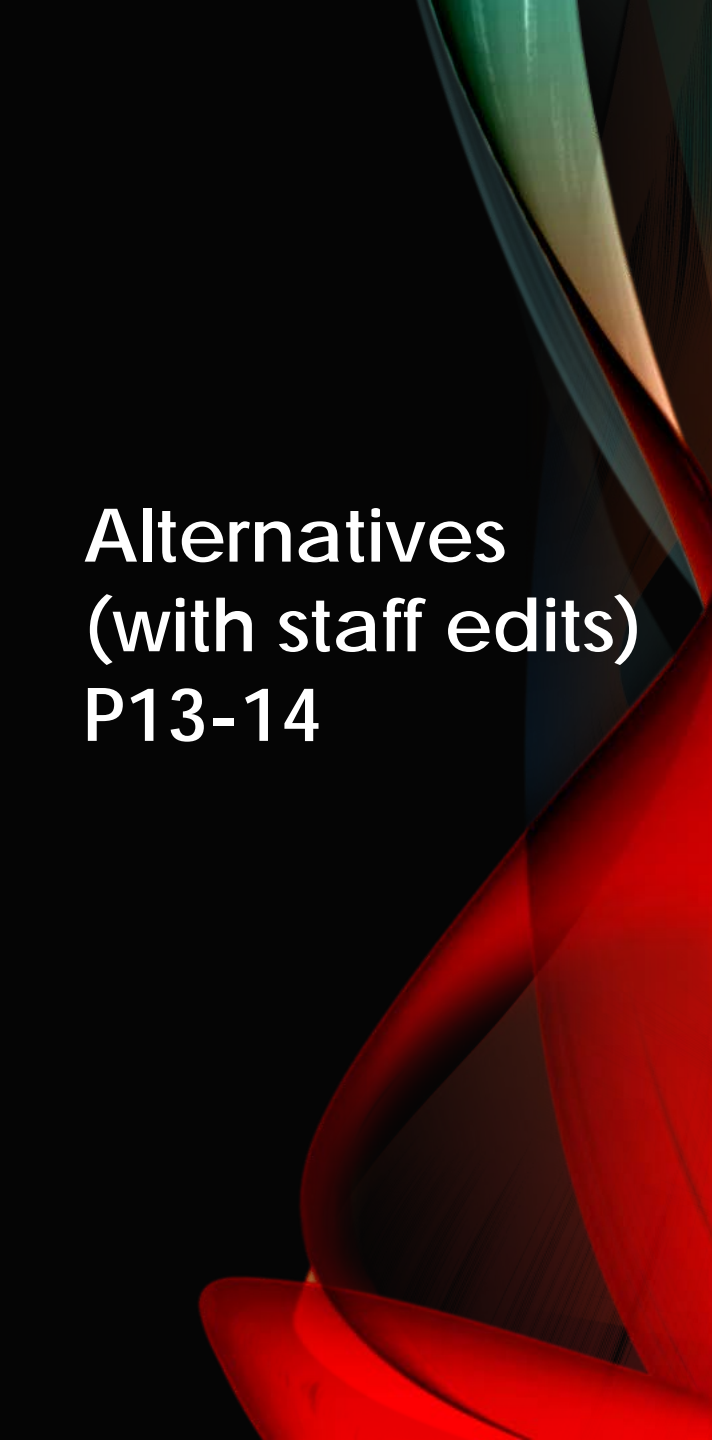
Over the past six years, declining trends in halibut abundance and the proportionate reductions in guided sport bag limits may incentivize sport fishing businesses to offer non-guided vessel rentals and assisted unguided fishing experiences. This shift appears to be contributing to a proportional increase in unguided sport harvest in IPhC Areas 2C and 3A. Because unguided sport harvest is deducted from the total allowable catch of halibut before the guided sport and commercial allocations are set, the growth in unguided halibut harvest could result in a reallocation of halibut from the guided sport and commercial sectors to the unguided sport sector. To provide a measure of stability in the future to the halibut charter and commercial sectors, the Council is considering management strategies for the unguided halibut sport sector that will require registration for vessels offering non-guided vessel rentals and apply charter halibut bag and size limits when halibut is retained on non-guided vessel rentals. Registration and consistent management measures between charter and non-guided vessel rentals would ensure appropriate accounting of sport halibut catch and reduce incentives for shifting harvest patterns that could reduce allocations to the charter and commercial sectors. This proposed action is not intended to modify regulations for anglers fishing on private boats.



**Alternatives
(with staff edits)
P13-14**

Alternative 1: No Action (Status quo)

- Does not differentiate unguided halibut sport fishing regulations for anglers renting vessels and anglers aboard a private vessel.
- Unguided rental vessels that may be used to fish for halibut would not have a new registration requirement.
- Bag limits under Alternative 1 would remain the same for all unguided recreational anglers, including for those anglers using rental vessels to harvest halibut.



**Alternatives
(with staff edits)
P13-14**

Alternative 2: Require registration for unguided rental vessels

Require registration for unguided motor vessels that operate in IPHC Areas 2C and 3A that are used to retain recreationally harvested halibut and that are rented for compensation. This registration would apply to all vessels used to provide access to the halibut resource for compensation, including but not limited to unguided rental boats, mother ships, bare boat charters, fishing clubs, time shares and all other means whereby compensation is exchanged for access to the halibut resource.

Element 1: Apply the registration requirements:

Suboption 1: IPHC Regulatory Area 2C and 3A

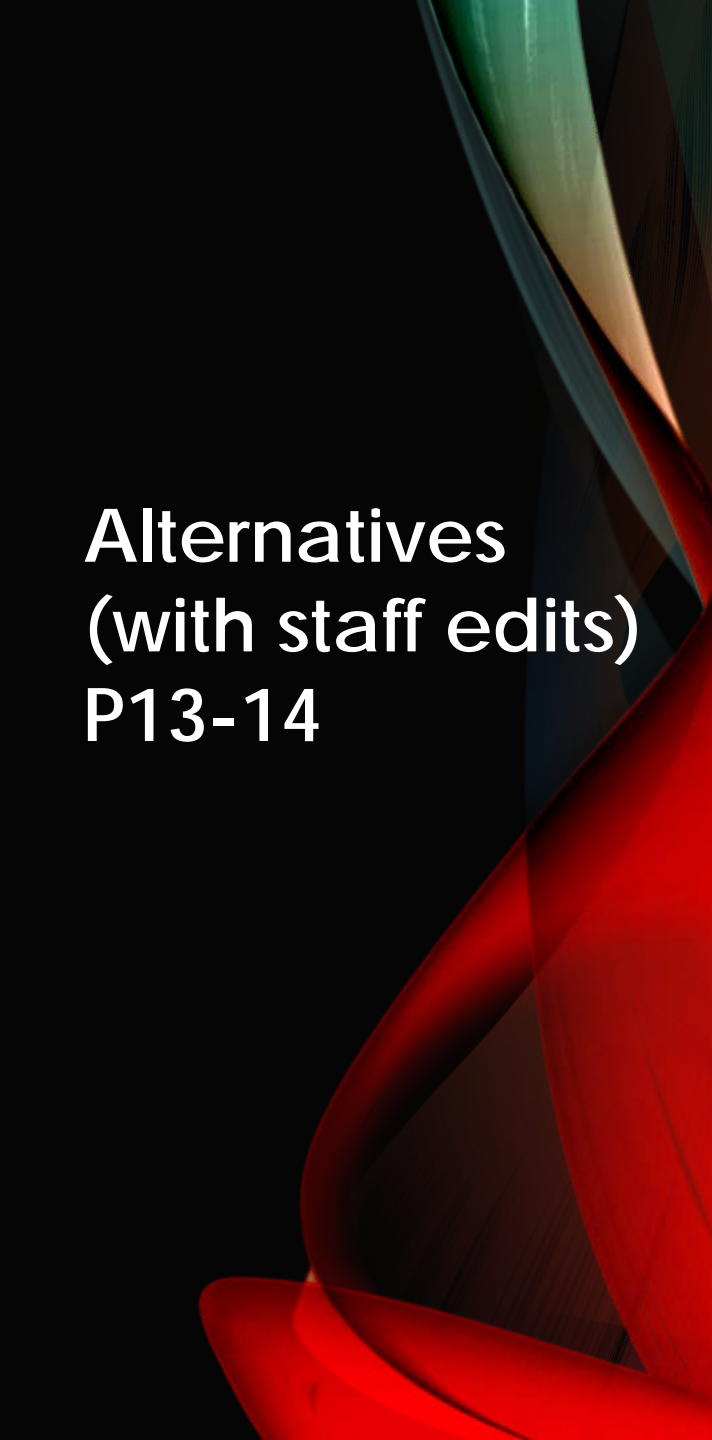
Suboption 2: Only IPHC Regulatory Area 2C

Element 2: Require unguided rental vessel registration be renewed:

Suboption 1: Annually

Suboption 2: Every 3 years

Suboption 3: Every 5 years



**Alternatives
(with staff edits)
P13-14**

Alternative 3: Align bag and size limits between charter anglers and unguided anglers on rental vessels.

Unguided anglers on rental vessels shall comply with the same daily bag and size limits that apply to charter anglers under the Catch Sharing Plan.

Suboption: Provide an exemption to aligning bag and size limits to MWR vessels.

Note: More than one action alternative may be chosen.

NOTES ABOUT METHODS, P18

- Lack of data
- Majority of document on status quo
- Analysis of impacts minimal due to lack of data, therefore mostly qualitative descriptions.

Halibut Management

Harvest from rental boats (compensation exchanged)

Harvest from private boats (uncompensated)

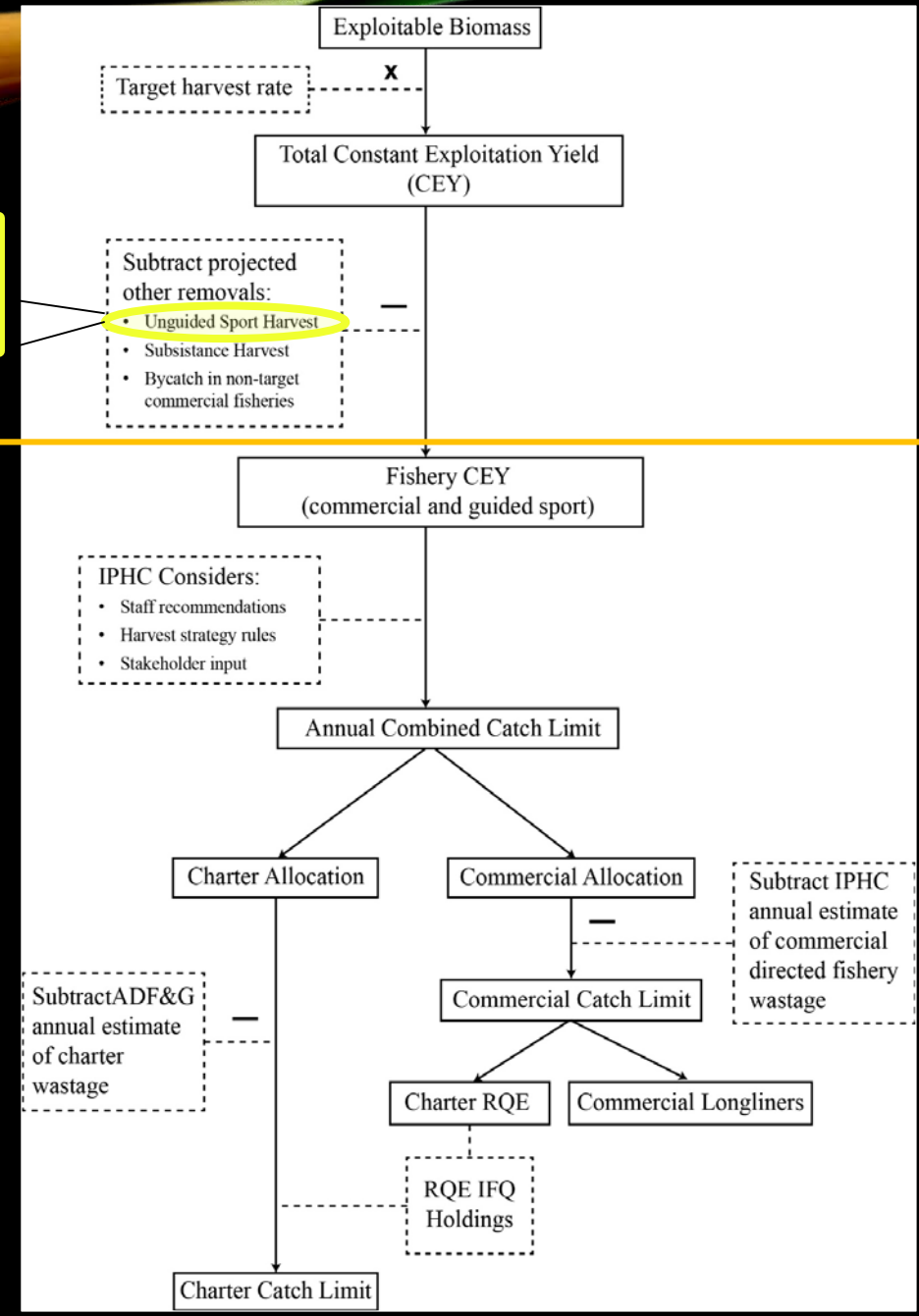


Figure 2-2, P20 Process for setting annual combined catch limits, charter, and commercial allocations, and charter and commercial catch limits under the CSP

Under CSP. Includes charter and IFQ

2019 BAG LIMITS

Figure 2-7, p 26

Unguided (both areas)

- Two fish of any size daily.

Charter (Area 2C)

- One fish daily
- U38-O80 reverse slot limit

Charter (Area 3A)

- Two fish daily
- 28-inch maximum size limit (U28) on one fish, other can be any size.
- Wednesday closures
- Five Tuesday closures
- Annual four fish limit
- 1 trip/day limit

Table 2-1 Historical Charter Halibut Bag and Size Limits in Areas 2C and 3A

p25

Area	Year	Management measure
2C	2006 (and prior)	Two fish any size
	2007	Two fish, one U32
	2008	Two fish, one U32, except 1 fish limit June 1-10
	2009	One fish any size
	2010	One fish any size
	2011	One fish, U37
	2012	One fish, U45-O68 rev. slot
	2013	One fish, U45-O68 rev. slot
	2014	One fish, U44-O76 rev. slot
	2015	One fish, U42-O80 rev slot
	2016	One fish, U43-O80 rev slot
	2017	One fish, U44-O80 rev slot
	2018	One fish, U38-O80 rev slot
2019	One fish, U38-O80 rev slot	
3A	2013 and prior	Two fish any size
	2014	Two fish, one ≤ 29", one trip/day with halibut harvest.
	2015	Two fish, one ≤ 29", Thursday closed Jun 15-Aug 31, annual limit 5 halibut, one trip/day
	2016	Two fish, one ≤ 28", Wednesday closed all year, annual limit 4 halibut, one trip/day
	2017	Two fish, one ≤ 28", Wednesday closed all year, 3 Tuesdays closed, annual limit 4 halibut, one trip/day
	2018	Two fish, one ≤ 28", Wednesday closed all year, 6 Tuesdays closed, annual limit 4 halibut, one trip/day
	2019	Two fish, one ≤ 28", Wednesday closed all year, 5 Tuesdays closed, annual limit 4 halibut, one trip/day

EXISTING REGISTRATIONS, p27

- **Registration of sport fishing services (businesses) and sport fishing guides**
- **ADF&G vessel registration**
- State of Alaska DMV vessel registration
- Federal USCG registry
- Defining businesses that provide rental boats as “outfitters”

EXISTING REGISTRATIONS, p28

- Registration of sport fishing services (businesses) and sport fishing guides
- ADF&G vessel registration
- **State of Alaska DMV vessel registration**
- Federal USCG registry
- Defining businesses that provide rental boats as “outfitters”

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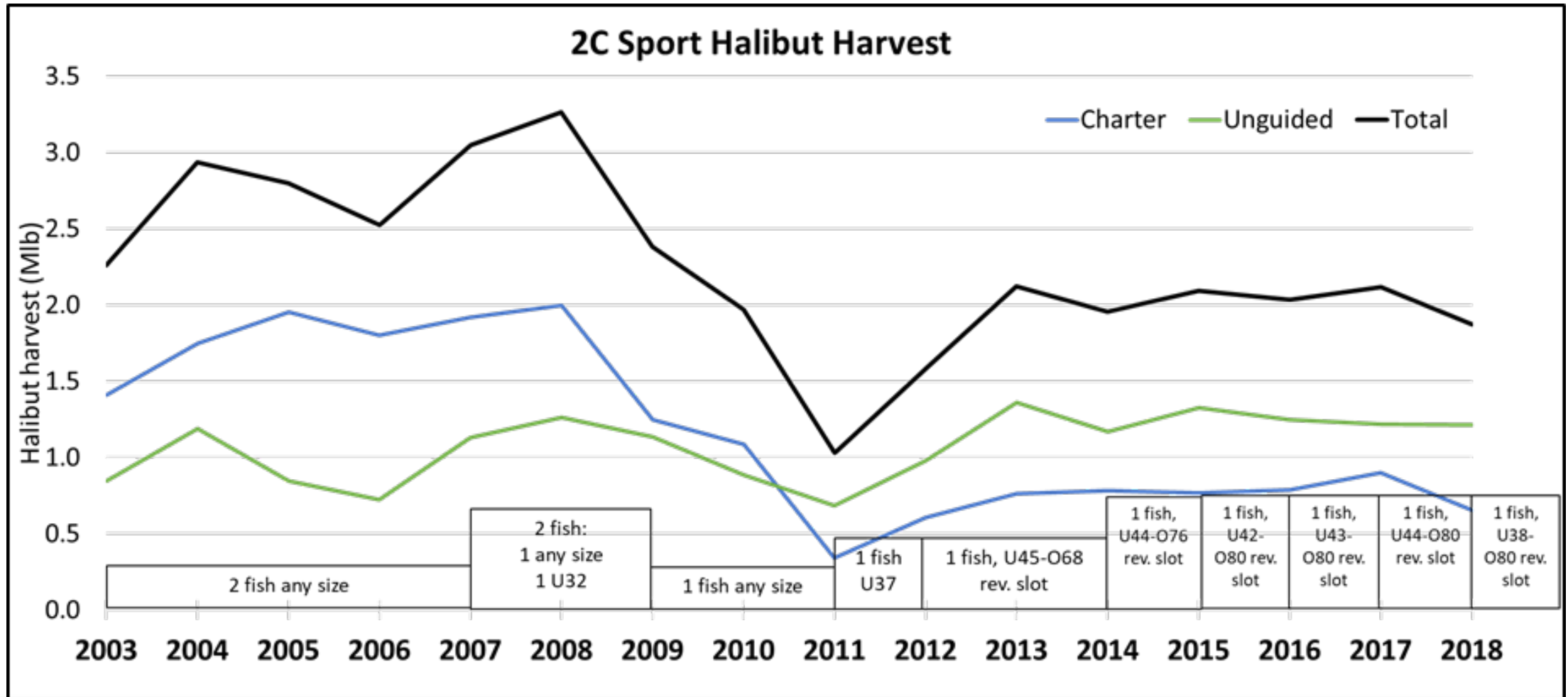
- Registration of sport fishing services (businesses) and sport fishing guides
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- **Defining businesses that provide rental boats as “outfitters” – p18**

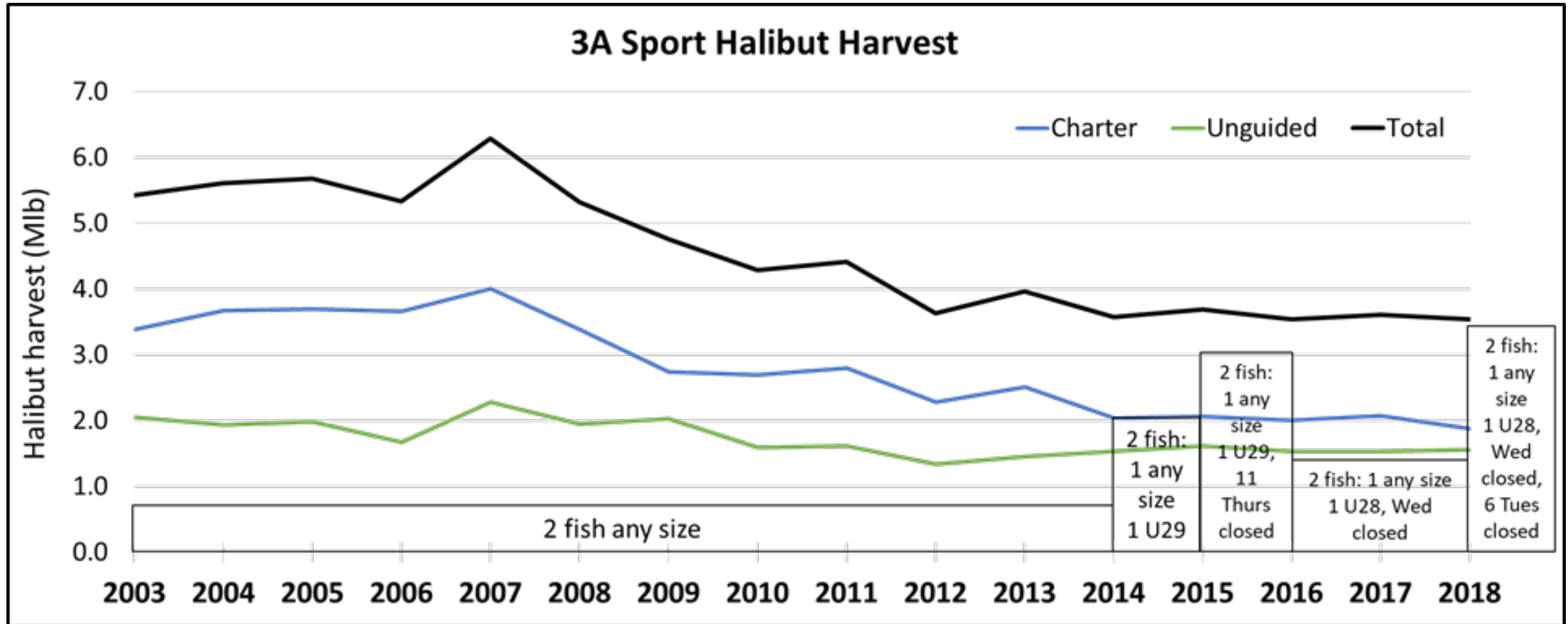


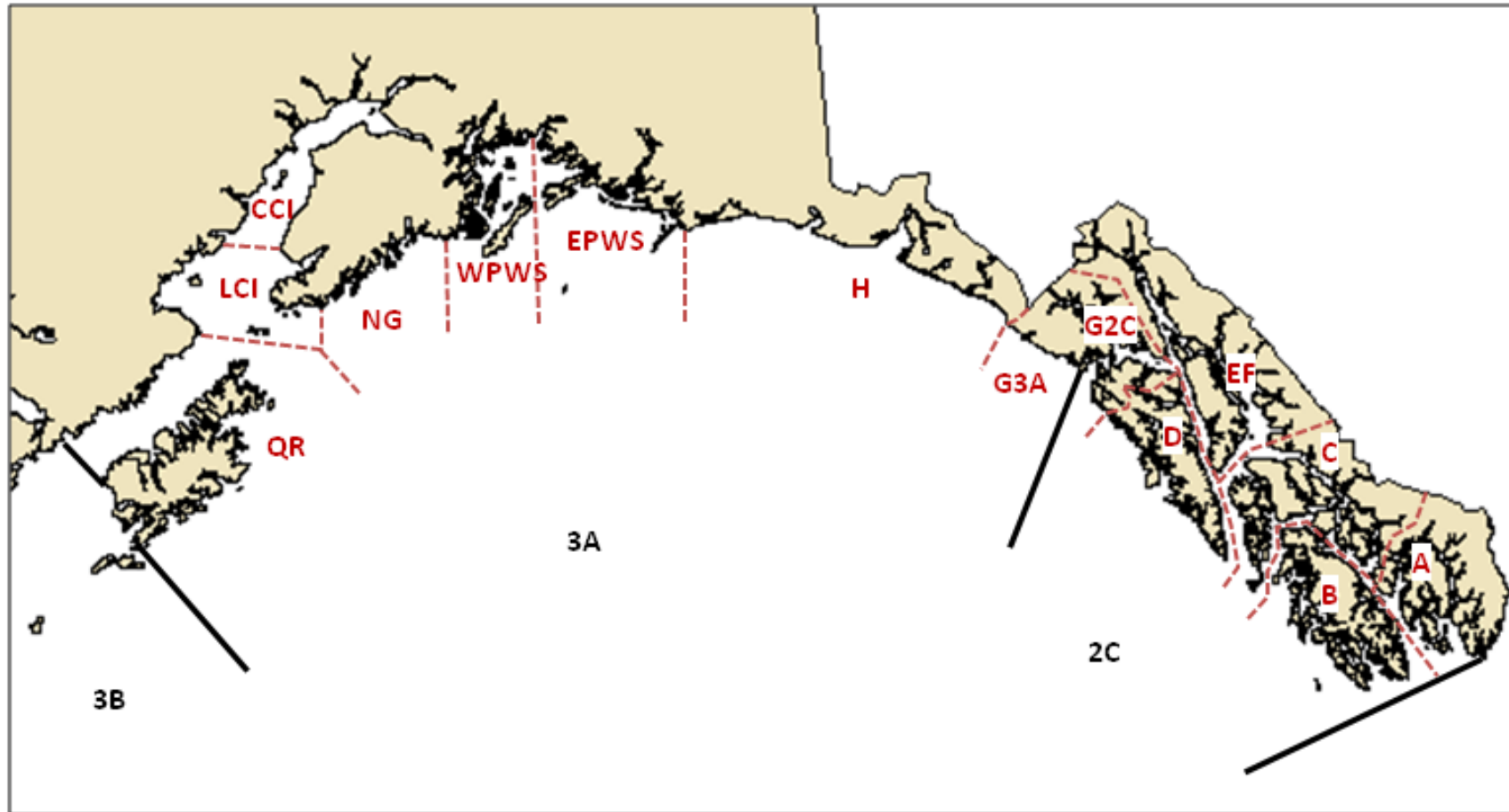
RECREATIONAL HALIBUT HARVEST: DATA

- Charter logbook
- Statewide harvest survey (SWHS)
- Creel sampling
- Data on unguided rental vessel subsector is lacking

Figure 2-11 p34








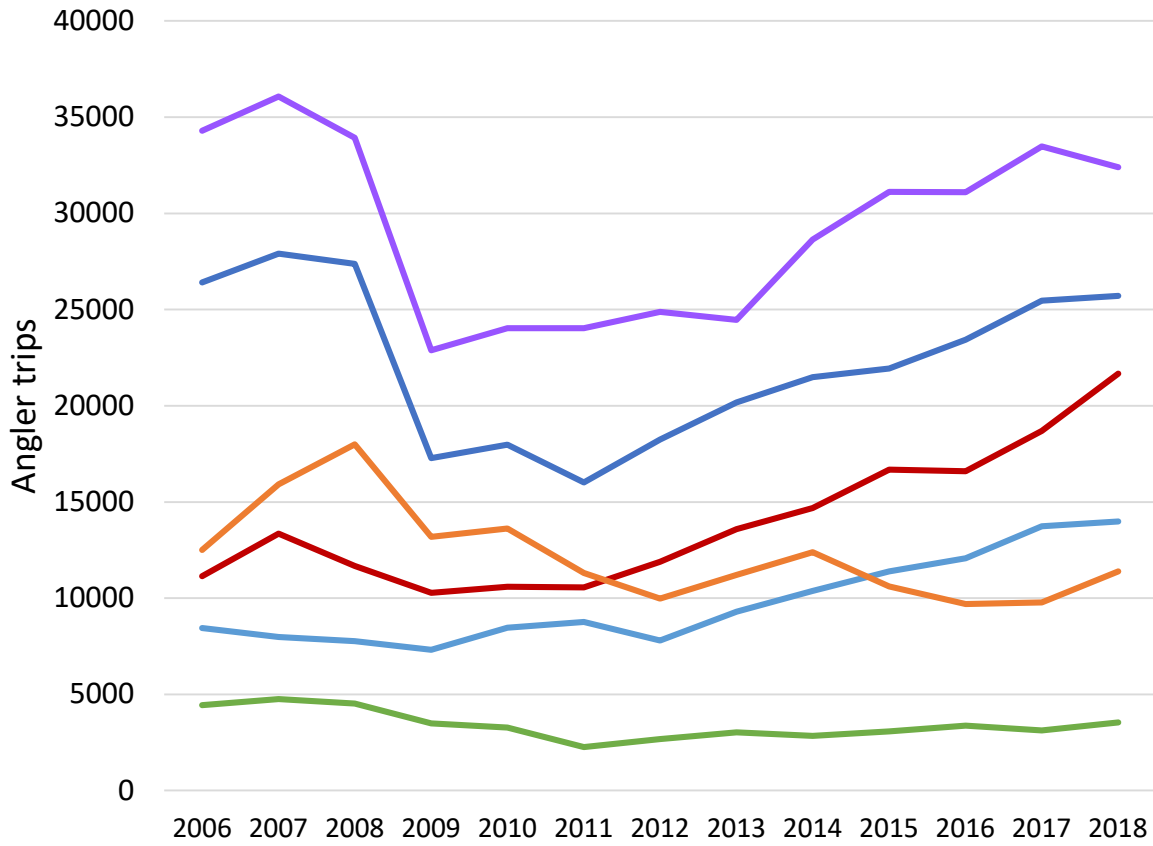
 - Subareas for halibut harvest accounting

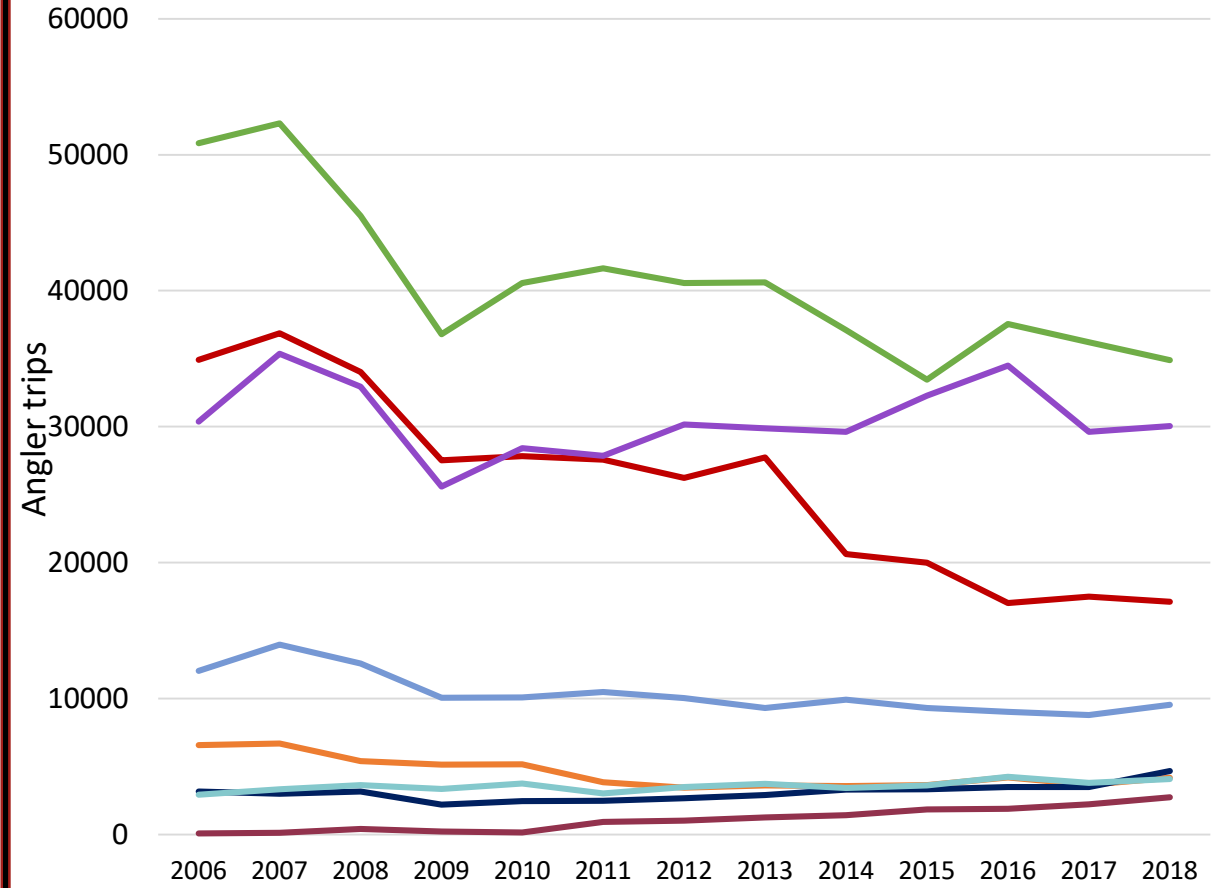
Figure 2-16, p37

Area 2C Charter Effort



- Ketchikan
- Petersburg, Wrangell
- Juneau, Haines, Skagway
- Prince of Wales
- Sitka
- GB, Elfin Cove 2C

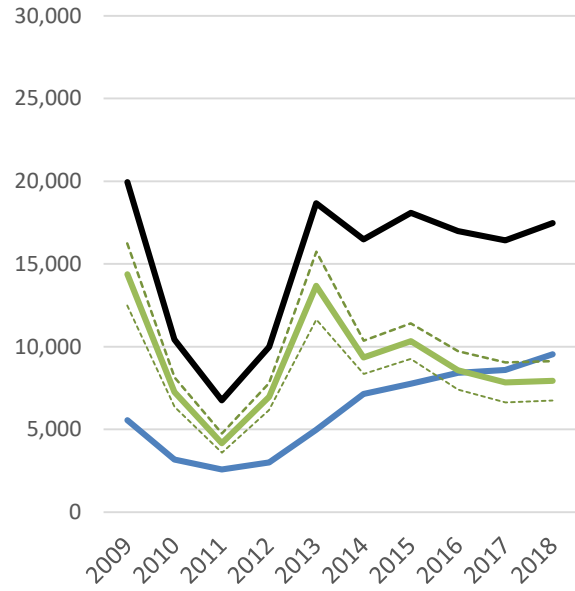
Area 3A Charter Effort



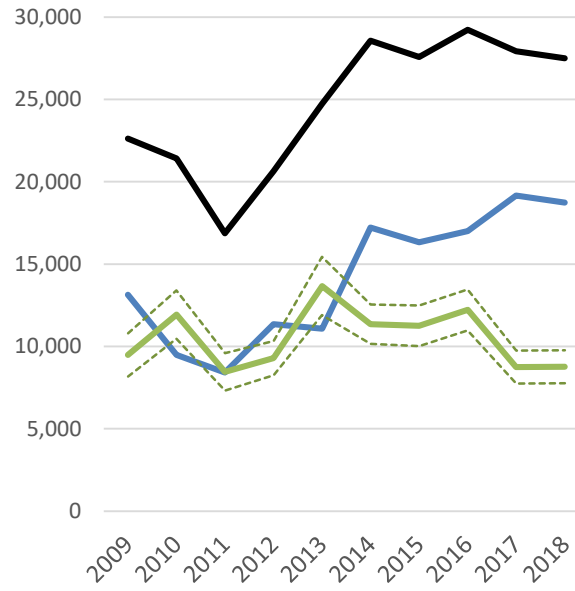
- CCI
- Yakutat
- Kodiak
- EPWS
- LCI
- WPWS
- GB, Elfin Cove 3A
- NG

of halibut harvested

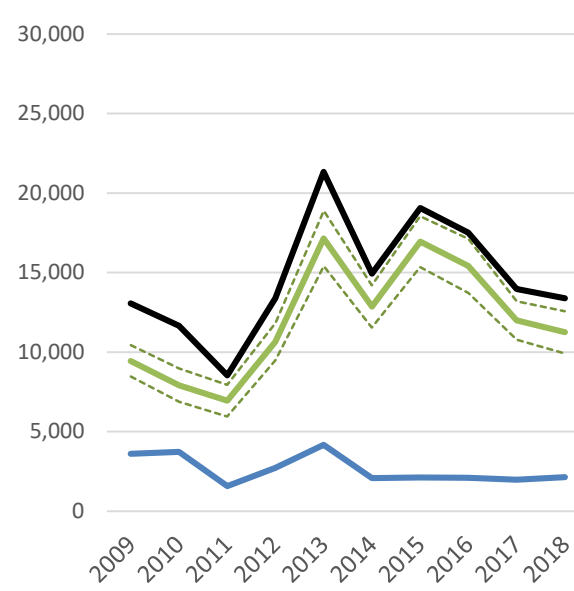
Ketchikan



Prince of Wales

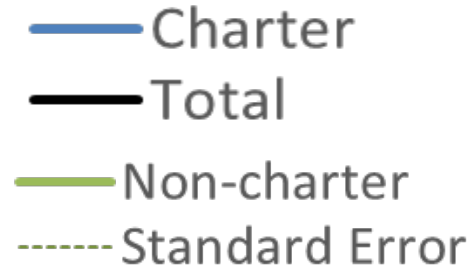


Petersburg/Wrangell

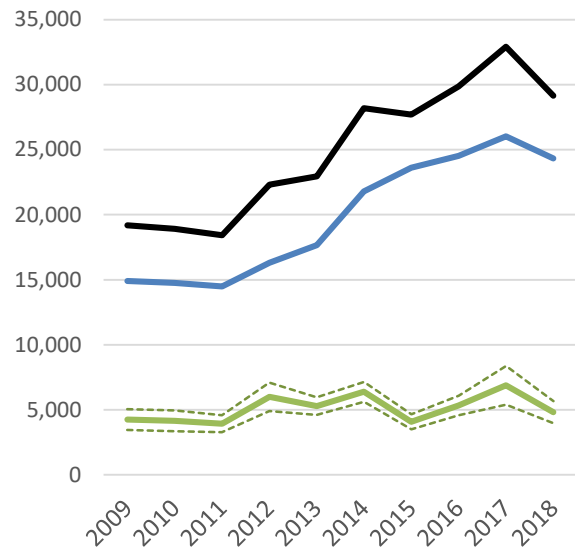


Recreational
harvest by
subareas

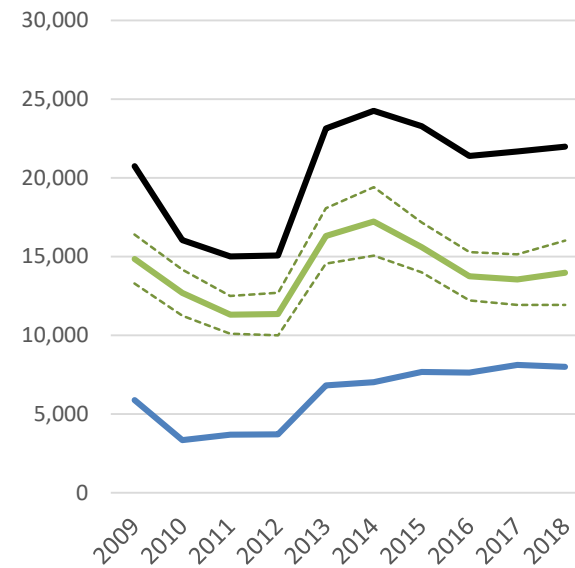
Area 2C



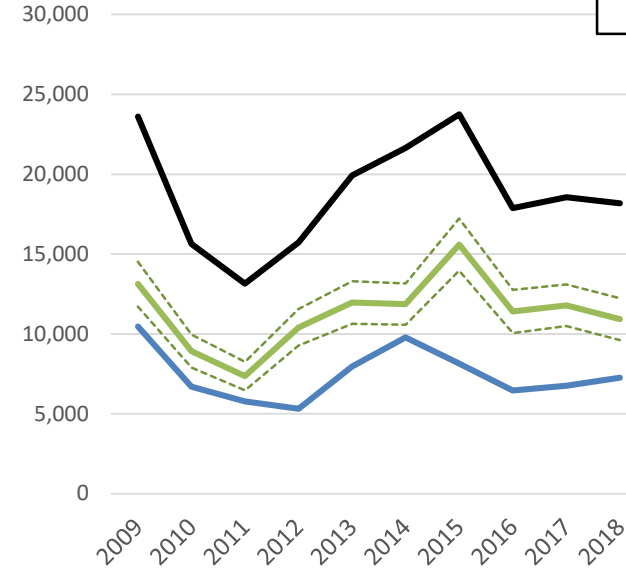
Sitka



Juneau/Haines/Skagway

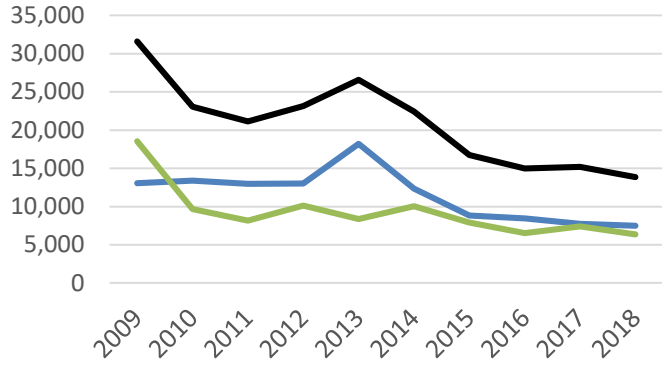


Glacier Bay

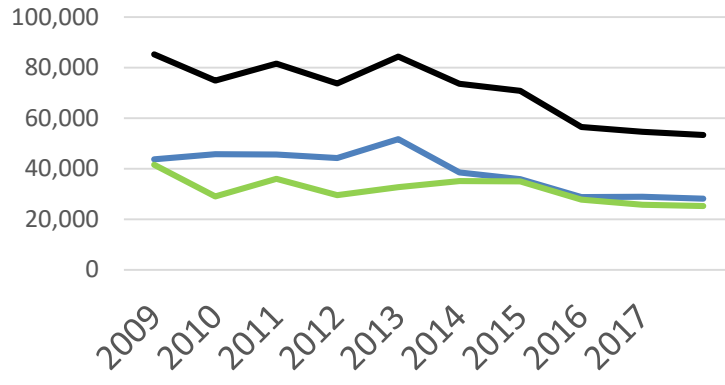


of halibut harvested

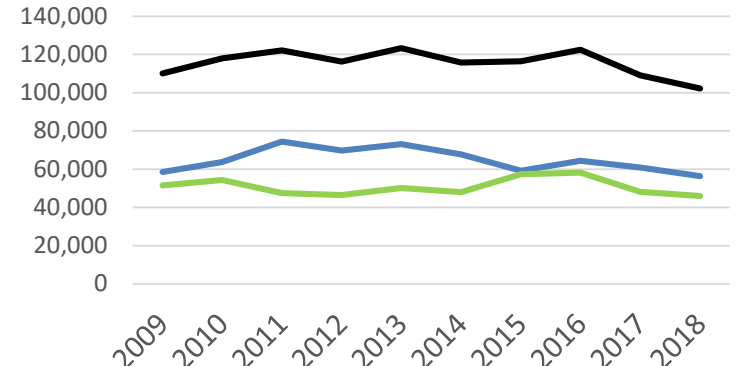
Kodiak



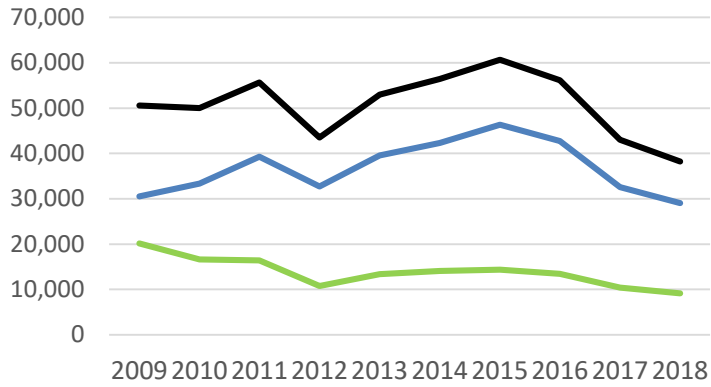
Central Cook Inlet



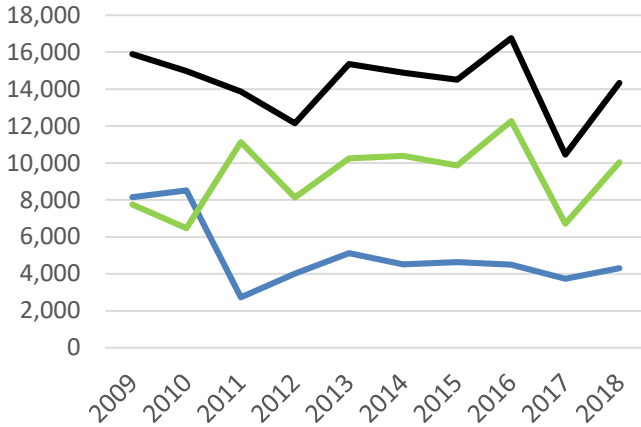
Lower Cook Inlet



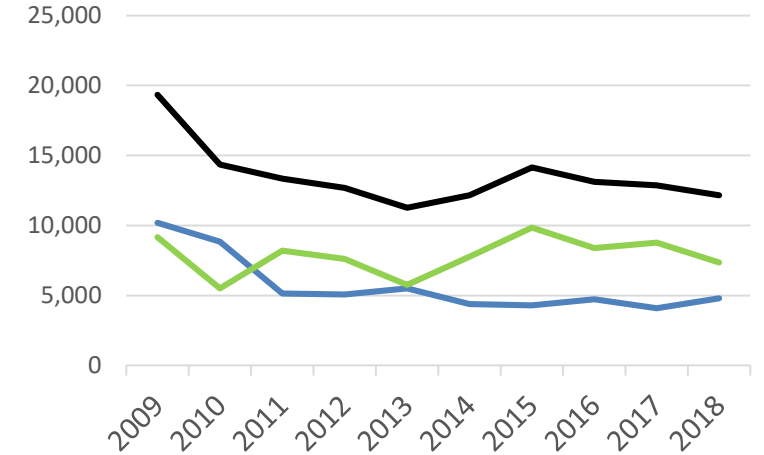
North Gulf Coast



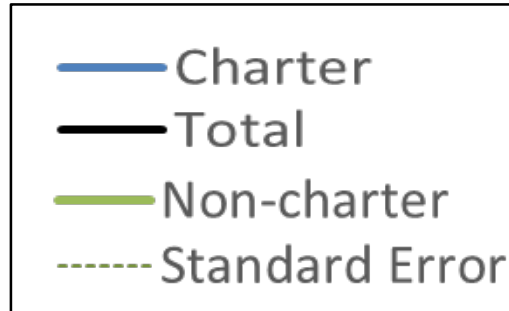
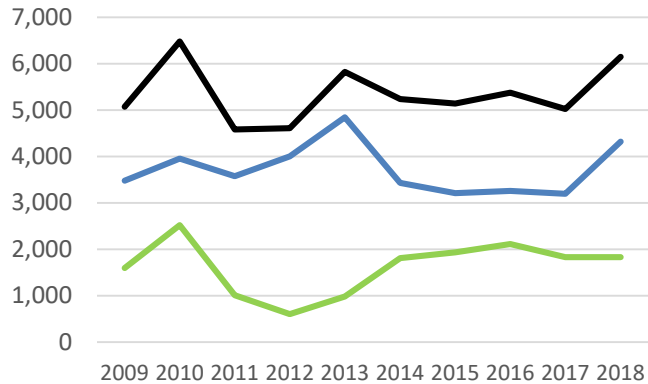
Western PWS



Eastern PWS

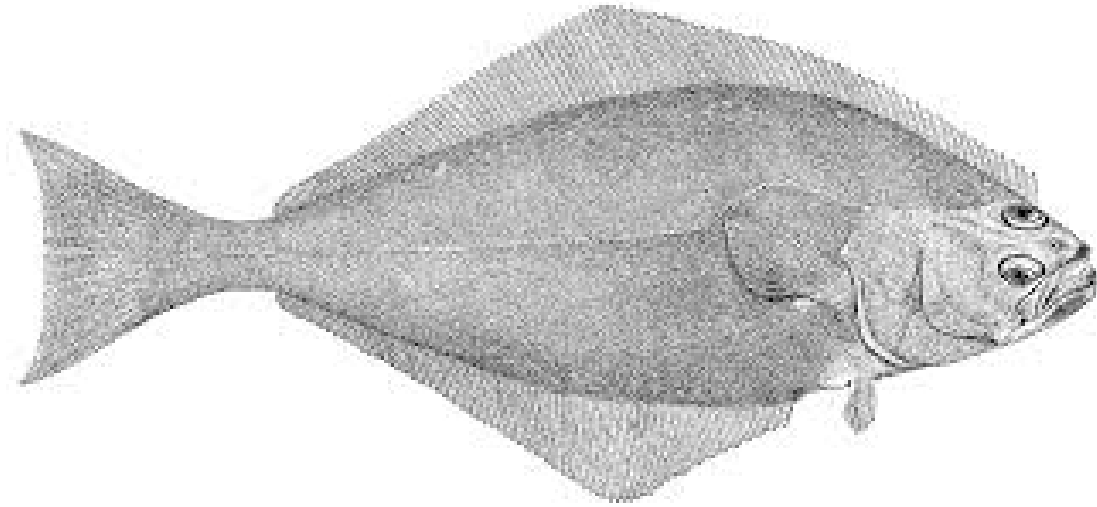


Yakutat



Recreational harvest by subareas

Area 3A



SUMMARY OF TRENDS P43

UNGUIDED RENTAL VESSEL SUBSECTOR

P44

- Varying interests, motivations, and activities of passengers aboard rental vessels
- No comprehensive database with # of vessels available for rent without a guide, nor with amount of halibut caught from such boats.
- (minimum estimate) 71 businesses offering rentals, 296 boats
- Several types of operations
 - Bareboat rentals (17)
 - Lodge packages (23)
 - Mixed guided and unguided fishing operations (31)

RENTAL OPERATIONS BY REGION

P47

Halibut area	Estimated (minimum) # businesses	Estimated (minimum) # boats
Area 2C		
Juneau	3	12
Glacier Bay	7	39
Sitka	6	10
Petersburg	7	28
Prince of Wales	21	57
Ketchikan	12	97
Total 2C	56	243
Area 3A		
CCI	1	13
Lower Cook Inlet	2	3
Kodiak	1	2
E PWS	4	14
W PWS	1	5
North Gulf	3	7
Yakutat	3	9
Total 3A	15	53

Comparison of Alternatives for Decision Making

Alternative	Impacts
<p>Alternative 1</p> <p>Status quo. No action.</p>	<ul style="list-style-type: none"> • If regulations for charter (guided) halibut fishing are considerably more restrictive than those for unguided halibut fishing, anglers have an incentive to fish unguided from rental vessels instead of fishing from charter vessels • Lack of information on participation and harvest by the unguided rental vessel subsector leads to a data gap in management • Unguided rental boat anglers can continue to access unguided bag limits • No additional reporting burden on the unguided rental vessel subsector • No additional administrative burden for implementing agency
<p>Alternative 2</p> <p>Require registration for unguided halibut rental vessels</p>	<ul style="list-style-type: none"> • Burden of time and added paperwork on vessel owners who are required to register boats • Potential means to account for the number of businesses that rent vessels, as well as determine the total number of rental vessels that could be used for catching and retaining halibut • Administrative cost to the agency(s) for developing, maintaining, and enforcing a registration
<p>Alternative 3</p> <p>Align bag limits between charter and unguided rental vessels</p>	<ul style="list-style-type: none"> • Decreased bag and size limits for anglers on unguided rental vessels • Increased complexity of sport fishing regulations and increased risk of anglers failing to be in compliance with the regulations • Potential distributional shift in revenue dependent upon changes in angler preferences and behavior: <ul style="list-style-type: none"> ○ Potential for decreased revenue to rental vessel owners and associated communities if anglers who previously rented vessels decide to no longer rent vessels due to reduction in bag limit. ○ Limited potential for increased revenue to charter operators and associated communities, if those who once rented vessels decide to use charter vessels after bag limits are aligned • Potential for incremental increases in catch limits for the commercial (IFQ) and charter sectors under the halibut Catch Sharing Plan (CSP)

ANALYSIS OF IMPACTS

ALTERNATIVE 1, p48

ANALYSIS OF IMPACTS

ALTERNATIVE 2, p48

- Impacts on rental vessel businesses
- Impacts on halibut users

ANALYSIS OF IMPACTS


ALTERNATIVE 3, p49

- Impacts on unguided sportfishing anglers
- Impacts on rental vessel businesses
- Impacts on charter businesses
- Impacts on CSP
- Impacts on communities

MANAGEMENT AND ENFORCEMENT CONSIDERATIONS, p53

- Registration options
- Administrative costs of registration
- Catch accounting/reporting requirements

EXTRA SLIDES

- 
- Cannot identify what type of business something is based on the business name alone
 - What if there are still ways to get around the “rental vessel” and people are just less compliant with the definitions of rentals/compensation?

COUNCIL CLARIFICATION

- Alt 3- Both areas?
- Non-guided vs unguided- language should be consistent throughout p&n and alternatives. Using unguided because that is what NMFS uses.
- Define rental boat, fishing clubs, time shares, mother ships
- Catch accounting mechanism
- What is a “sportfishing” business?

ALTERNATIVE 3

- Just like renting a sailboat and then being stuck with a charter limit even though you have no guide?
- No lobby for resident angler (better as a Council talking point than as a point in the paper)—just speaks to our outreach effort... we don't generally hear from them in our Process.