



C2 Public Comment
February 2017
Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

Juneau, AK 99801

Phone: 907-586-6652

Email: seafa@gci.net

Fax: 907-523-1168

Website: <http://www.seafa.org>

January 21, 2017

North Pacific Fishery Management Council

Dan Hull, Chair

605 w 4th Ave, Suite 306

Anchorage, AK 99501

RE: C-2 Mixing Guided and Unguided Halibut on the Same Vessel

Dear Dan Hull and Council Members,

Southeast Alaska Fishermen's Alliance (SEAFA) read the discussion paper that was prepared regarding the Mixing of Guided and Unguided Halibut on the Same Vessel slated for review at the February 2017 Council meeting. **SEAFA supports alternative 3** as described in the discussion paper. We agree that this is a serious loophole that could be partly closed with this action. We believe that the paper and alternatives should be expanded so that lodges or any company that offer both unguided and guided services would also be treated the same to the more restrictive guided halibut bag limits and not just the mothership/multi-trip sector.

Sincerely,

Kathy Hansen

Executive Director



January 23, 2017

Chairman Dan Hull
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501
Npfmc.comments@noaa.gov
RE: C2 Mixing Guided and Unguided

Dear Chairman Hull,

The Southeast Alaska Guides Organization (SEAGO) is a non-profit dedicated to the sustainability of the sport fishing industry in Southeast Alaska. We work to promote the tradition of sport fishing in Southeast Alaska through reasonable regulations that ensure the long-term sustainability of our members' businesses and fish resources. SEAGO writes today to weigh in on the issue raised by the Enforcement Committee, and the resulting staff discussion paper, regarding mixing of guided and unguided halibut on the same vessel.

SEAGO appreciates the challenges for accountability and enforcement if mixed halibut is possessed on a fishing vessel, and that these challenges are not addressed by current regulations. Our main concern lies in the lack of existing data; as it stands, the scope of this problem remains undefined. Currently, there is no information as to the numbers of boardings raising this issue. There is likewise no data on the extent of businesses which have any level of mixed guided and unguided halibut on their vessels, or use locations which meet the proposed definition of fishing vessels. As staff correctly points out in the discussion paper, it is difficult to measure the impacts of any action on the status quo or those directly affected by the action alternative. This issue is largely theoretical without data.

In addition to the unknown impacts of this action, SEAGO is concerned that the proposed definition of "fishing vessel" is overbroad. As staff notes in footnote 4 of the discussion paper, the definition of fishing vessel in the North Pacific Halibut Act is understood to include vessels, as well as floating support facilities that are anchored, moored, or tethered to shore on convention waters. In Southeast, some locations operate a processing facility on the dock, as opposed to inside a building on shore. Strictly interpreting this broad definition would negatively impact every business which uses or operates a floating processing dock which serves both guided and unguided vessels. This interpretation affects the processing docks regardless of whether boats are independently operated as solely guided or unguided.



SEAGO stresses that Council, Council staff, and the public require adequate data before the Council takes further action on this issue. Without this data, neither the public nor Council staff can meaningfully contribute to the regulatory process. Further, with adequate data as to the extent or business practices of these locations, alternative management measures may suggest themselves.

Sincerely,

Samantha Weinstein

Samantha Weinstein
SEAGO, Executive Director
Samantha@segoalaska.org