

## C4 Mixing of Guided and Unguided Halibut Public Comment – APRIL 2018

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### **Capt. Kevin Burchfield**

Juneau Chart Boat Operators Association  
3/30/2018 9:53:22 AM

The Juneau Charter Boat Operators Association does not agree with this as it is not well enough defined...it does not specifically state that these fish would not be included in our allocation. We also believe that it is such a small segment that it would not truly have any consequence.

### **Tom Gemmell**

Halibut Coalition  
3/29/2018 9:43:54 AM

Please see attached.

*Attachments:* [20180329 Mixed Guided and Unguided Halibut C4.pdf](#)

### **Samantha Weinstein**

Southeast Alaska Guides Organization  
3/29/2018 7:02:30 PM

*Attachments:* [C4 Mixing Halibut Letter.docx](#)

### **James Phillips**

Ninilchik Saltwater Charters  
3/30/2018 7:38:55 AM

Seems to me that what ever new regs or admendments to existing regs people that make their living from the fishing industry adapt. I am impressed with the floating lodge concept , They will take their floating lodge out to a good fishing area with a fleet of small boats and let their clients fish in these boats without a guide and call this unguided fishing. The fishing regulators definitely have a lot of new or maybe old adapters to deal with. I understand why they have to get creative in order to servive in our industry , since 2010 our fleet has been cut in half , our allotment has been cut in half and our days we can work has been cut in half. Personally my business is having a very hard time keeping good charter captains and deckhands, some of them had been with me for over ten years and have had to find different jobs in order to take care of their families. I would have loved to increase their pay to keep them but to offset their pay by charging clients more to fish just will not work.Families just cannot afford to take their love ones fishing at current prices much less an increase . Charters in Ninilchik are struggling to stay afloat with the all the new regulations getting more sever every year especially taking away our prim days in July and August .My little three boat operation looses about four thousand dollars a day that we cannot fish, plus no one gets paid when my boats are on shore. We have a very short window now about sixty five to seventy days to make enough to pay the bills for the remaining seven months when we are not chartering . We in Ninilchik have a huge disadvantage , we have no multi fishery we can utilize to compensate for nonfishing Halibut days. We are limited to Halibut and a few days of Salmon fishing , unlike Seward, Wittier , Kodiak 2A ond others, besides limited Halibut fishing days our means of launching our boats out of Deep Creek which is only open from May first until Labor Day and also dealing with blow off days makes our willingness to survive very changeling. I love my little Charter business and I believe we make a major economic contribution to our community and Alaska. I am completely understanding we must do our part in sustaining our fishery but I believe our problem is not with the Charter sector I believe Commercial and other countries who do not abide by our regulations are the ones making the major impact our fish depletion . One last comment is these estimates for the charter bycatch , I believe the survival rate is much higher than estimated, what I have experienced unless the Halibut has swallowed the hook down past it gills which is very rare, the way they vigorously swim away I believe the survival rate is very high.Unlike commercial fishing is which is surely death, we do catch some halibut that are missing a large part of their jaw. Thank You for taking the time to read my concerns and comments. I pray for your wisdom and fairness in your decisions on how we can sustain our fishery and business.  
Captain Jim Phillips

**Kathy Hansen**

Southeast Alaska Fishermen's Alliance  
3/30/2018 8:48:47 AM

*Attachments: [Limit Possession of Guided & Unguided Halibut on Same Vessel 3.27.18.pdf](#)*

**Jim Martin**

Alaska Charter Association  
3/30/2018 11:40:42 AM  
Please see attached file -

*Attachments: [April ACA Comment NPFMC Item C4.pdf](#)*