

Alaska Halibut Forever
Gustavus, Alaska
c/o Judy Brakel
P.O. Box 94
Gustavus, AK 99826
(907) 697-2287

Comment on Agenda item C3 - Discussion Paper: Self-Guided Rental Boats Registration

Our Gustavus-based organization, Alaska Halibut Forever, has been writing to the NPFMC about the self-guided halibut sportfishing businesses for years. We pointed out that self-guided operations are a way of circumventing charter halibut permits (CHPs), charter client daily bag and size limits, and logbook reporting. Last year, we requested “that Staff Tasking at the end of the December 2016 Council meeting include a task of research on the self-guided halibut sport fishing sector, particularly in Halibut Area 2C where it is most prevalent. And that the staff suggest approaches to directly regulating this sector.” We supplied information about the size and growth of the sector in Area 2C, including a preliminary study of self-guided company websites by Larry Landry. The council voted to accept this staff tasking topic.

Later we learned that Council member Andy Mezirow removed this topic from Staff Tasking and at the June 2017 meeting presented a substitute. Approved by the council, the substitute instructed staff to cooperate with ADF&G and the National Marine Fisheries Service to explore the creation of a registration system for motorized boats. Staff would prepare a formal Discussion Paper that would provide a definition of “self-guided rental boat” and suggest mechanisms to create a vessel registration, should the council conclude that necessary. We were disappointed in the limitations of this new direction but, nevertheless, submitted the requested letter of support.

The Discussion Paper now available provides minimal advance toward assessing and dealing with the self-guided sector. It already seemed doubtful to us that “boats available for rent” was the appropriate topic. What we usually see is that boats are just one component in a self-guided package that includes lodging, meals, fishing gear, advice (including GPS coordinates for typically productive “hotspots”), and services such as fish cleaning and packaging. It seems doubtful that there are separate boat rental agreements or boat-specific transactions in most of these cases. We do agree with the paper’s conclusion that a problem statement and purpose and need statement are needed “which may also help identify approaches other than vessel registration that may provide the Council with information it can use to address the problem.” Finding ways to curtail this new and expanding sector requires considering all available approaches.

The Discussion Paper states that “There are no data on the number of boats available for rent, or the number of halibut caught by such boats.” Fortunately, the Halibut Coalition has produced a detailed report showing that in Area 2C there are 48 businesses that offer over 170 boats for self-guided halibut fishing. (Eighteen of these businesses have Charter Halibut Permits and also offer guided fishing.) The significance of the self-guided sector should no longer be in question.

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The statement that “there are no data on . . . the number of halibut caught by such boats” is very true. These fishermen are treated as simply part of the category of “private sport fishers.” The harvest data for this larger group is obtained only from ADF&G’s Statewide Harvest Survey mailed each fall to a random sample of all sport fish license holders (responses are optional). Note that a proposal before the IPHC from Patty Phillips of Pelican would require logbook-style reporting of halibut catches by the self-guided sector. If adopted, this could be a helpful step.

Meanwhile the halibut harvest by this growing sector, which avails itself of the “two-fish-of-any-size” harvest rule applicable to non-guided sport fishermen, probably adds substantially to the proportion of the sport harvest that comes “off the top” of the total allowable halibut catch prior to the Catch Sharing Plan’s annual allocation of halibut among the longline and charter sectors, to the disadvantage of both sectors. The Discussion Paper’s graph of charter versus private (including self-guided) harvests in Area 2C shows the “private” sector increasing and surpassing the charter fishery. In our local area (Icy Strait, Glacier Bay, and Cross Sound), by 2015 the total sport fishery (all types combined) had equaled the commercial harvest, and the sport harvest had become 22 percent charter/78 percent non-guided.

Our group’s chief concern is local depletion of halibut near Southeast Alaska communities. Both charter and self-guided sport fishing tend to operate out of communities, often out of rural communities, fishing in the same areas where local residents fish for household food. See maps at the end of this letter showing that halibut charter fishery effort concentrates in areas different from the halibut commercial fishery. Halibut is a traditional and important food in Southeast Alaska’s rural communities. The charter fleet is expected to increase its halibut harvests under the Recreational Quota Entity program, and the self-guided fleet is expanding without constraint, both of them increasing pressure on inshore resources. Seemingly without intentional decisions, the halibut resource is being reallocated away from local coastal communities to primarily lower 48-based operations with clients who ship their fish out of state. Unlike the situation in Area 3A, in 2C less than two percent of charter harvest is taken by clients who are Alaska residents, and the same is probably true of self-guided clients. True, halibut is a federally managed fishery, but the Magnuson-Stevens Fishery Management and Conservation Act states that effects of management actions on communities should be considered.

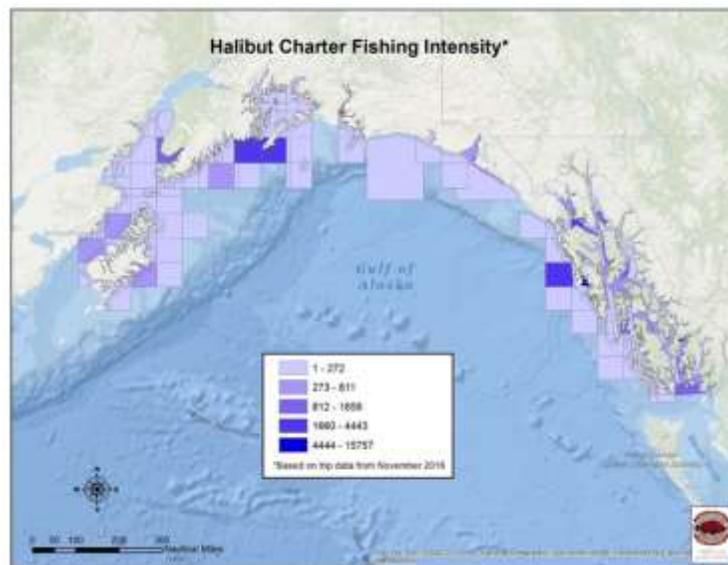
The overlap and intensity of the charter and self-guided fleets fishing in the same areas fished by rural residents is especially concerning, given that the halibut management system for Alaska does not attempt to prevent local depletions. All halibut management measures—total harvest allocations, IFQs, CHPs, charter daily bag and size limits, etc.—are only on the basis of large regions, like Area 2C and 3A. The single exception is a 1990s-era regulation establishing

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the Sitka Sound Local Area Management Plan (LAMP). Created because of—guess what!—Sitka residents' distress about local depletion of halibut near their community.

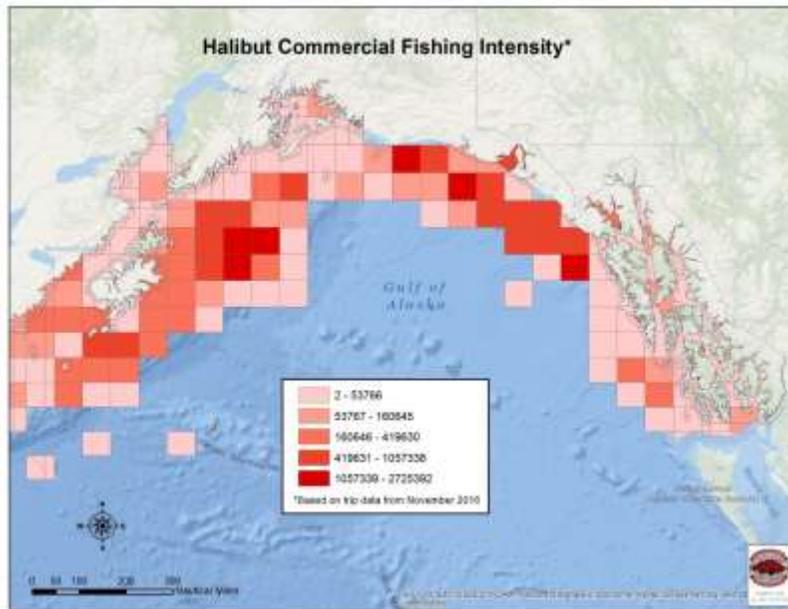
What can be done? More local-area management of halibut for Area 2C and 3A would reduce the threat of local depletions. Note that the Pacific Fishery Management Council, which manages the halibut resource in off the coasts of Oregon and Washington, does far more local-area management of halibut sport harvests. Among other US sport fisheries there may be models useful for restricting the halibut self-guided sector. One option would be to require self-guided clients to abide by the annual charter fishery bag and size limits. If a problem like this occurred in Alaska's commercial fisheries—for example, if commercial fishermen invented a new gear type and began using it to circumvent the IFQ or state limited-entry regulations—we would see some effective action, and promptly!

The maps below show the halibut charter fishery's areas of concentration, which differ from those of the commercial longline fishery.



Pacific States Marine Fisheries Commission

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Gustavus, Alaska
c/o Judy Brakel
P.O. Box 94
Gustavus, AK 99826
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Pacific States Marine Fisheries Commission

Date: Sat, Nov 4, 2017 at 8:45 AM

Subject: Re: Self-Guided Halibut Rental Boat Discussion Paper

To: steve.maclean@noaa.gov

I THANK YOU FOR THE HALIBUT SELF-GUIDE RENTAL BOAT DISCUSSION PAPER. I HAVE RETIRED FROM BASICALLY BEING A GUIDE IN ALASKA WATERS. I AM VERY AWARE OF THE IMPACT THE SELF-GUIDE BUSINESSES ARE HAVING ON THE HALIBUT FISHERY WITH NO REAL MECANISM IN PLACE TO DETERMINE HOW MUCH THEIR HALIBUT CATCH IS AFFECTING THE HALIBUT RESOURCE SINCE THEY ARE ALLOWED (2) FISH ANY SIZE EACH DAY RATHER THAN WHAT THE CHARTER FLEET IS ALLOWED. ALSO, BUSINESSES WHICH OFFER SELF-GUIDE BOATS SHOULD BE RESPONSIBLE TO REPORT THE TOTAL DAILY CATCH OF ALL THEIR BOATS SO ADF&G WILL HAVE A GOOD RECORD OF TOTAL YEARLY CATCH OF THE SELF-GUIDE SECTOR.

I PLAN TO VISIT ALASKA TO RENT A SELF-GUIDE BOAT TO AVOID THE CHARTER LIMITATIONS, JUST, AS I AM SURE, MANY FISHERMEN WILL BE DOING THE SAME IN THE FUTURE DUE TO THE LOWER COST OF SUCH A TRIP AND THE ADVANTAGE OF TAKING MORE FISH WHICH, I AGREE, IS NOT A GOOD THING FOR THE HALIBUT RESOURCE.

I HOPE THE COUNCIL WILL RECCOMEND REGISTRATION.

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PO Box 22073
Juneau, AK 99802-2073
(425) 949-1810msg (206) 260-9111efax

halibutcoalition@gmail.com
www.halibutcoalition.org

October 31, 2017

Mr. David Witherell
Executive Director
North Pacific Fishery Management Council
605 W 4th Avenue, Ste 306
Anchorage, AK 99501-2252

Dear Mr. Witherell,

We have prepared a review of self-guided halibut charter boats and are forwarding it for your consideration in the preparation of the forthcoming discussion paper on this topic.

Also included is prior public comment on the RQE program that discusses self-guided rentals.

If you have any questions, feel free to contact me via email or at (907) 723-3358

Sincerely,

A handwritten signature in blue ink that reads "Tom Gemmell". The signature is written in a cursive, slightly slanted style.

Tom Gemmell
Executive Director

Enclosure: (1) Self-guided halibut rental boats
(2) Larry Landry RQE comments

Alaska Longline Fishermen's Association • Cordova District Fishermen • Deep Sea Fishermen's Union •
Fishing Vessel Owners Association • Halibut Association of North America • Kachemak Bay Fisheries
Association • North Pacific Fisheries Association • Petersburg Vessel Owners Association • Sea Food
Producers Cooperative • Southeast Alaska Fishermen's Alliance • United Cook Inlet Driftnetters Association
• United Fishermen's Marketing Association • United Southeast Alaska Gillnetters Association

Prepared by Halibut Coalition

October 31, 2017

Estimate of Self-guided Halibut Rental Boats in IPHC Areas 2C/3A

The North Pacific Fishery Management Council is scheduled to receive a discussion paper in December 2017 on “Self-guided halibut rental boats”. We thought it would be helpful to estimate the size of the rental fleet.

METHODOLOGY

In October 2017, we prepared an estimate of self-guided halibut rental boats. Our methodology was to conduct a web search (e.g. self-guide Alaska; boat rental Ketchikan) and review the websites/Facebook of known charter businesses (e.g. CHP guide businesses). We then reviewed the text and pictures on the websites to estimate the number and type of rental boats; this was subjective and in many instances, we estimated low (e.g. 1 boat) because of the lack of specific information. In some instances, we received information from locals who observed rental operations.

SUMMARY

In IPHC Area 2C we estimate there are approximately 173 rental boats operated by 43 businesses, including 18 CHP owners.

In IPHC Area 3A we estimate there are approximately 20 rental boats operated by 7 businesses, including 4 CHP owners.

Enclosure: List of self-guided halibut rental companies and boats

Date Checked		Company	Owner	Location	Number of unguided boats	Type of boats	CHP	Website	
20170829	2C	Fish Baranof LLC	John Emmi 50% Lisa 25% & Scott 25% Laudon	Sitka	3	Skiff	No	http://www.fishbaranof.com/	
20170829	2C	Sitka Alaska Outfitters	Greenling Enterprises LLC, Kenneth Rear and Deborah Younger-Rear	Sitka	1	20' runabout	No	https://www.sitkaalaskaoutfitters.com/	
20171030	2C	Sitka Self Charters	Workman Enterprises, LLC. William Workman 45%	Sitka	1	18' Hewes	No	http://sitkaselselfcharters.webs.com/	
20171019	2C	Waters Edge Lodge	North Star Lodge LLC (Kelly Crum LLC) UT	Elfin Cove	10	Sea Hunt Triton 220, Defiance Commander 220 EX	No	https://www.watersedgealaska.com/	
20171024	2C	Pelican Joe's	Joe Quinn, Sole Proprietor	Pelican	1	21' Duckworth	1 Non	http://www.pelican.net/index.php/activities-accommodations/sports-fishing-charters-boat-rentals	
20171024	2C	South Passage Outfitters	South Passage Outfitters, LLC. Montgomery-Alice 10% Anne 10% Dennis 35% Rosie 10%; Margaret McDonald 35%. Truckee, CA.	Gull Cove, Icy Strait	3	18' Lund	No	http://www.southpassageoutfittersllc.com/lcy-Straight-Adventure.asp	
20171019	2C	True North Sportfishing	True North Sportfishing LLC (UT). Forrest H Braden (Nephi, UT)	Gustavus	1	Glacier Bay 2680 catamaran	2 Trans	http://gustavusalaskafishing.com/self-guided-halibut-fishing.html	
20171019	2C	Taylor Charters	Greg Taylor, Sole Proprietor	Gustavus	2	Skiff	No	http://taylorchartersfishing.com/	
20171019	2C	Alaskan Angler's Inn	Alaskan Anglers Inn LLC. Dwayne Nash 50% Scott Swenson 50% (Deep Blue Charters)	Gustavus	2	Skiff	2 Trans	https://alaskananglersinn.com/promotions-and-events/	
20171030	2C	Majestic Expeditions	Majestic Expeditions, Inc. Josh Graves 45% Christina Graves 45% Jeremy Kump 10%	Gustavus	2		1 Trans	http://www.majesticexpeditions.com/	
20171018	2C	Doc Warner's Alaska Adventures AKA Doc Warner's Alaska Fishing. Domestication to Bountiful, UT. Feb 2017.	Doc Warner's Alaska Fishing Inc. Linda Warner 50% Mark C Warner 50%. (Bountiful, UT).	Excursion Inlet	18	18-20' skiffs	No	http://docwarners.com/selfguided/	

Date Checked		Company	Owner	Location	Number of unguided boats	Type of boats	CHP	Website	
2.02E+08	2C	Icy Point Lodge	Isl Enterprises, LLC. Edwin Phillips 49% Donna Martin 51%	Hoonah	3	18.5' Smokercraft Phantom	None	http://www.icystraitlodge.com/boat---auto-rentals.html	
20171018	2C	Whaler's Cove Lodge. AKA Upside, Inc. AKA KILLISNOO HARBOR LLC DBA WHALER'S COVE LODGE	Whaler's Cove, Inc. Mark Powers 50%, Kristine Powers 50%	Angoon	5	18' to 24' boats	6 Trans	http://www.whalerscovelodge.com/Self-Guided-Fishing_W4303.cfm	
20171023	2C	Panhandle Powerboats	Panhandle Powerboats LLC. Jacob Buck 50% Mararet Buck 50%.	Juneau	4	18' to 26" North River River, C-Dory	No	http://www.panhandlepowerboats.com/faq.html	
20171019	2C	Green Rocks Lodge LLC.	Jason Harper 33% Petra 33% Tim 34%	Petersburg	2	Skiff	No	http://www.greenrockslodge.com/packages.html	
20171023	2C	Rocky Point Resort	PAYNE - Walter 25%, Pam 25%, Susan 25%, Mike 25%	Petersburg	2	16' skiffs	5 Trans	http://www.rockypointresortak.com/boats_guides	
20171023	2C	Majestic Eagle Lodge	Involuntarily dissolved 6/10/2013	Petersburg	0			http://www.majesticeaglelodge.com/index.php/fishing-rates	
2.02E+08	2C	Petersburg Sportfishing Charters	Petersburg Sportfishing LLC (UT, Expired 9/26/17). Donn and D'Ann Hayes, North Richmond, UT	Petersburg	1	20" Hewescraft	1 Trans	http://www.petersburgsportfishing.com/fish.html	
20171023	2C	Island Point Lodge	Island Point Lodge Inc. Frank Stelmach 50%, Kevin Stelmach 50%	Petersburg	8	Skiff	No	http://www.islandpointlodge.com/	
20171023	2C	Alaska Sport Haven (Float House)	Robert A Bailey, Sole Proprietor	Petersburg	2	20' & 22' Hewescraft, Lunds (2) in photo	No	http://www.alaskasporthaven.com/Float_House_Details.html	
20171023	2C	Jensen's Boat Rentals	Lensen LLC. John Jensen 50%, Pamela Rae Jensen 50%.	Petersburg	5	20" & 22" Hewescraft, 18' skiffs	No	http://www.jensensboatrentals.com/Jensens_Boat_Rentals_Rates.html	

Date Checked	Company	Owner	Location	Number of unguided boats	Type of boats	CHP	Website	
20170829	2C Woxof Lodge and Fish Camp	Searing Enterprises, LLC. Robert Searing 100%. Corona, CA	Point Baker	5	Skiff	1 Trans 1 Non-trans	http://www.pointbakercharterservice.com/	
20171019	2C Calder Mountain Lodge	Robert Miller 50% Patricia Miller 50%. Preston, ID	Point Baker	10	18' and 20' skiffs	1 Trans	http://www.caldermountainlodge.com/rates-info/	
20171025	2C The Outpost at Point Baker	Point Baker Trading Post, Inc. Herbert Hoyt 50% Judith Wright 50%	Point Baker	3	16" & 18" skiffs. 21" Glasply	None	http://pointbaker.com/fishing.html	
20171018	2C Alaska Sea Otter Sound Lodge LLC	Tim Comer 50% Murtie Comer 50%	Prince of Wales (50 mi north of Craig)	10	18' - 19' Jetcraft skiffs	1 Trans	https://www.seaottersoundlodge.com/fishing/self-guided/	
20171019	2C Alaska's Log Cabin and RV Resort (Log Cabin Sports Rental Inc)	Log Cabin Sports Rental, Inc. Martin Fabry Verne Fabry. % not listed.	Klawock	2	Skiff	1 Trans	http://www.logcabinresortandrmpark.com/chart-erunguided.html	
20171019	2C Fireweed Lodge	Andersons Fireweed Lodge LLC (Robert Anderson 100%)	Klawock	1		5 Trans 2 Non-trans	http://alaskafishingkingsalmon.com/index.html	
20171023	2C Southeast Retreat Fishing Lodge	Southeast Retreat, Inc. Jeff Larson 50% Kelli Larson 50%	Klawock	1	Lund	1 Trans	http://www.southeastretreat.com/self-guided-fishing-adventure.php	
20171018	2C Alaskan Escape AKA ALASKA ESCAPE LLC	Chris Werner 33% Mark Werner 33% HI Rufus Kimura 33% HI	Thorne Bay	4	16' Lund	None	http://www.alaskanescape.com/fishing-alaskan-escape-thorne-bay-alaska/	
20171019	2C Adventure Alaska Southeast	Jason Clowar, Sole Proprietor	Thorne Bay	3	Lund	None	http://www.fishorhunt.com/DIY_Fish.php	
20171018	2C Coffman Cove Bear's Den	David Rotman 100%	Coffman Cove	1	26' Boultoncraft	None	http://www.coffmancovebearsden.com/self-guided-alaska-fishing-packages/	
2.02E+08	2C Coffman Cove Adventures	Michael Warner, Sole Proprietor	Coffman Cove	1	16' Harbercraft Skiff	None	http://www.coffmancoveak.com/fishing_adventures.html	
20171019	2C L & W Fishing Adventures	Wayne Disarro, Sole Proprietor	Whale Pass	2	18' and 20' skiffs	1 Trans	http://www.lwfishingadventures.com/pictures.html	
20171025	2C Alaska Fish Tales Lodge	Alaska Fish Tales Boat & Fishing Charters. Burt Weller or Gregg Cook	Whale Pass	2	Skiff	None	http://www.alaskafishtaleslodge.com/index-5.html	
20171025	2C Port Protection Adventures	Port Protections Adventures, LLC. Gregg Dockweiler 100%	Port Protection	2	Skiff, 26' North River	None	http://www.greatfishingtrips.com/guidearticles.asp?AID=133	10/25/17 for sale \$495K

Date Checked	Company	Owner	Location	Number of unguided boats	Type of boats	CHP	Website	
20171025	2C Naha Bay Lodge & Naha Bay Outdoor Adventures	Mark Edwards, Sole Proprietor.	Naha Bay	2	16' Lund skiffs	1 Trans	http://www.nahabayoutdooradventures.com/	
20170903	2C Clover Bay Lodge (Floating)	Air Marine Co, Inc. (Admin dissolved 9/30/16). Affiliated with Alaska Sportfishing Expeditions	Clarence Str	7	18 Foot Smoker Crafts with 40hp Yamaha Outboards.	1 Trans. 1 Non-Trans (Oaksmith)	http://www.cloverbay.com	
20171019	2C Silverking Lodge Inc	Bill Ruth 33.33% Don Olson 33.33% Kirk Thomas 33.33% Russell Thomas President 0%. Affiliated with Alaska Sportfishing Expeditions.	Ketchikan (Grant Island)	9	14' Livingston skiffs; 20' Thunder Jet boat	None	https://www.silverkingalaska.com/alaska-fishing-vacation-rates/	
20171018	2C Anglers Dream Self Guided	Alaska Remote Lodges LLC. Kim Kirby 100%	Ketchikan	1	20 Foot Hewescraft Pro V Extended Transom	Unknown	https://www.rentbyowner.com/property/anglers-dream-self-guided-fishing-private-boat-dock-beach-hot-tub-fish-on/HA-375643	
20170902	2C Salmon Falls Fishing Resort	SF Alaska Limited Partnership (Domicile: Delaware. Heavilin Management Company, AZ). Past Alvin White.	Ketchikan	2	16' skiffs	4 Trans. White 11 Non-Trans	http://www.salmonfallsresort.com/	
20171006	2C Knudson Cove Marina	Michael and Linnaea Troina, Knudson Cove Marina LLC	Ketchikan	18	Lund, Hewescraft, Northwest Boats (20'),		http://www.knudsoncove.com/	10/17/17 for sale \$3.2M
20171017	2C Chinook Shores Lodge	Jeffery Wedekind 100%	Ketchikan	7	(5) 21' and (2) 20'	1 Trans	http://chinookshores.com/facilities/self-guided-boats/	
2.01E+08	2C Explore Alaska Charters LLC	Richard D Collins 100%	Ketchikan	3	22' Hewescraft, 179 Hewescraft, 22'Alaska Raider	1 Trans	http://www.explorealaskacharters.com/node/5/	
20171017	2C Alaskan Fishing Adventures, Ketchikan, LLC	Mark Burner % not listed	Ketchikan	1	20" Ryliejo	None	http://www.alaskanfishingadventures.com/self-guided	

Date Checked		Company	Owner	Location	Number of unguided boats	Type of boats	CHP	Website	
20171017	3A	Alaskan Fishing Adventures, LLC & Anglers Lodge, LLC	Mark Burner 50%, Julie Burner 50%	Soldotna	0		4	http://www.anglerslodge.com/	
20171017	3A	Ravencroft Lodge	Laura Hodgkin 100%	Port Fidalgo, Prince Wm Sound	3	18' skiffs	1 Trans	http://www.ravencroftlodge.com/self_guided.html	
20171025	3A	Alaskan Wilderness Outfitting	Alaskan Wilderness Outfitting Co, LLC. Thomas J Prijatel 50% Katie J Prijatel 50%	Prince William Sound	5	Skiffs	None	http://alaskawilderness.com/	
20171021	3A	Whittier Boat Rental	Painted Ocean Inc. Mattew Kopec 50% Meagan Zimpelmann 50%	Whittier	3	22' to 32'	3 Trans	https://alaska-boat-rentals.com/our-boats/	
20171019	3A	Millers Landing, Inc	Michael A Miller 10% Michael C Miller 50% Thomas Purcell Jr 40%	Seward	4	Stabicraft "Alaskan Special" 2050 Boat	2 Trans	http://www.millerslandingak.com/fishing/saltwater-charters/self-guided-fishing.htm	
20171019	3A	Monti Bay Lodge and Resort	Monti Bay Lodgee LLC (Curt Heikell 50% Diane Heikell 50%). Renton, WA	Yakutat	2	16'Deep V, 15' Smokercraft	None	https://www.montibaylodge.com/categories/boats	
20171023	3A	Homer Boat Rentals	Voluntarily dissolved 9/28/12	Homer	0			https://www.homerboatrentals.com/	
20171023	3A	Bayes Boat Rental	Bayes Boat Rental LLC. David Bayes 100%	Homer	2	22' Hewescraft, 22' Sea Sport	1 Trans	http://www.bayesboatrental.com/	
20171023	3A	High Tide Boat Rentals	Andrew White, Sole Proprietor	Homer	1	26' Baja Weekender	None	https://www.hightideboatrentals.com/pricing	
				2C	173				
				3A	20				
				TOTAL	193				

I write to express my opposition to the proposed RQE scheme. Like many Gustavus residents, halibut is an important part of our diet and I am having to work harder every year to put up enough for the winter. When I am out fishing, I do not see commercial halibut vessels, but I do see plenty of charter and self-guided boats. It seems pretty clear to me that transferring quota from the commercial to the charter fleet can only make a declining situation worse. Since the Council does not operate with a lens small enough to address or prevent local depletions, why adopt a formula which is going to make it more likely? All sectors of the halibut fishery need to feel the bite during periods of low abundance. The GAF was put in place for transfer between sectors and should be sufficient.

A Report on Self Guided Outfitters

In the midst of our concerns about local depletion, it is discomfiting to see the Council planning to increase charter harvests while turning a blind eye towards the unconstrained growth of self-guided fishing operators, which we see blossoming around us. When the Council took up the “sport fishing guide service” definition in 2013, pp. 15-17 of the respective Initial Regulatory Impact Review used catch data reported in logbooks to try and infer the number of self guided operations. It concluded that the numbers were inconsequential. To whatever extent that was true, (some Gustavus people vehemently disagreed with that assessment) it is certainly no longer the case. As one local operator told our Mayor, self-guided fishing is the “hot new thing”. Spurred by what we are seeing in our area, I took a more direct route and did some basic internet research to gauge the number of self guided operations in Alaska. Since many of them don’t show up on a Google search, a non-exhaustive list follows, including website links and the number of self guided boats they offer if that information is available:

EXCURSION INLET

Doc Warners Exclusively self-guided. <http://docwarners.com/blog/self-guided-fishing-help/>

ANGOON

Whaler’s Cove 8 boats available. http://www.whalerscovelodge.com/Self-Guided-Fishing_W4303.cfm

ELFIN COVE

Water’s Edge Exclusively self-guided; 13 boats available. <http://www.watersedgealaska.com/>

South Passage Outfitters (at Gull Cove east of Elfin Cove)

<http://www.southpassageoutfittersllc.com/About.asp>

GUSTAVUS

True North Sportfishing <http://gustavusalaskafishing.com/index.html>

Alaskan Anglers Inn <https://alaskananglersinn.com/>

Taylor Charters <http://taylorchartersfishing.com/>

KETCHIKAN

Alaska Fishing Adventures 1 self-guided boat. <http://www.alaskanfishingadventures.com/home>

Explore Alaska Charters; exclusively self-guided. <http://www.exporealaskacharters.com/node/5/>

Silverking <http://www.silverkingalaska.com/alaska-fishing-vacation-rates/>

Clover Pass Resort and RV park. <http://www.cloverpassresort.com/>

Chinook Shores Lodge 6 self guided boats,
<http://chinookshores.com/facilities/self-guided-boats/>

Sea Otter Sound Lodge <http://www.seaottersoundlodge.com/>

Naha Bay <http://www.nahabayoutdooradventures.com/>

WRANGELL

Rocky Point Resort <http://rockypointresortak.com/map>

PETERSBURG

Island Point Lodge. Primarily self guided, at least 8 boats available.
<http://www.islandpointlodge.com/rooms-rates/>

Green Rocks Wilderness Lodge <http://www.greenrockslodge.com/packages.html>

PRINCE OF WALES ISLAND

KLAWOCK

Alaska's Log Cabin Resort and RV Park <http://www.logcabinresortandrvpark.com/charterunguided.html>

COFFMAN COVE

Coffman Cove Bears Den Exclusively self-guided. <http://www.coffmancovesbearsden.com/>

WHALE PASS

Alaska Fish Tales Lodge <http://www.alaskafishtaleslodge.com/index-5.html>

PORT PROTECTION

Port Protection Adventures <http://www.greatfishingtrips.com/guidearticles.asp?AID=133>

POINT BAKER

The Outpost <http://pointbaker.com/outpost.html>

Calder Mountain Lodge <http://www.caldermountainlodge.com/rates-info/>

SITKA

Fish Baranof Advertises self guided as a way to get around the LAMP closure in Sitka Sound.
<http://www.fishbaranof.com/sitka-alaska-self-guided-fishing.php>

PRINCE WILLIAM SOUND

Alaska Wilderness Outfitting Company <http://alaskawilderness.com/>

Ravencroft 4 self guided boats. <http://www.ravencroftlodge.com/location.html>

HOMER

Homer Boat Rental They just rents boats, don't do all the catering. <http://www.homerboatrentals.com/>

Stellar Air They fly people to fishing spots, again without the catering.
<http://stellarair.com/services/unguided-trips/>

Data or not, the cumulative effect of this many operations is clearly significant. The best quantitative picture I can find comes from Doc Warner's lodge in Excursion Inlet—a self-guided only lodge—whose website chronicles most or all of its guests, and until 2014, their catch rates as well. In 2014, the lodge had 105 parties with at least 293 clients who caught 1113 halibut. In 2015, there were 205 parties with at least 593 fisherfolk, and in 2016, 189 parties with at least 569 people. Extrapolating the 2014 catch data to estimate succeeding year harvest yields 2253 halibut in 2015 and 2162 halibut in 2016. In the last two years, lodge clientele have considerably outnumbered the roughly 400 permanent residents of Gustavus. Disquietingly, those clients have increasingly been seen fishing Gustavus residents' traditional spots around Pleasant Island, where we are finding it ever more difficult to put up enough halibut for the winter. Everyone who fishes those waters is observing a marked decline in halibut abundance. Many of us don't have the larger boats which would enable us to travel farther afield in search of new fishing grounds.

Another indicator of the scale of the self guided fishing effort may be represented in the ADF&G charts and graphs depicted on pp. 217-18 of the Public Review Draft. That data shows non-charter harvests overtaking and exceeding charter harvests in Area 2C after 2011. Why would that be? With the population of Southeast Alaska stable during that time frame, one can posit that resident sport fishing has remained relatively constant. A substantial jump in nonresident self-guided fishermen could well be a significant component of the observed increase. That the same trend has not materialized in Area 3A, where the self-guided fleet is much smaller, buttresses this hypothesis. Doesn't something of this potential magnitude warrant Council attention?

Needless to say, Gustavus residents are not keen on becoming a casualty of this "hot new loophole", and urge the Council to take immediate steps to rein it in. An approach that strikes me as simple and logical is to make guided and non-guided clients of lodges/guiding operations subject to the same harvest limits. The distinction between the two classes of fisherman is really quite artificial. They usually both stay on the same grounds and eat the same meals. In one instance a guide takes the client to fish and in the other they tell them exactly where to go—often using premarked spots on GPS units—and how to fish. Most lodges bend over backwards to make sure that their self guided clients are safe, catered to and on fish. As one of many examples, from the Whaler's Cove website:

"Upon arrival at the lodge, key staff members will assist in showing you to your assigned boat, take you through the operation and emergency procedures, talk over the array of tackle and aid in rigging your rods with what the fish are currently hitting on. The "Fish-Master" will also direct you to the current areas where the guides are fishing. As mentioned above, there is a radio onboard your vessel which you can use to contact the "Fish-Master", lodge or guide boats to assist you if you need any help trying to locate and catch or land a monster, which happens a lot at our lodge. Self-guided anglers will receive plenty of assistance from the dock crew and guides to make your fishing safe and productive."

Other lodges encourage people to go out with guides for a day or two to learn all the ropes and places to fish before turning to the self-guided option.

The Council instituted charter halibut limited entry permits to place a cap on the swiftly expanding number of charter operators. The self-guided loophole is being aggressively used, not uncommonly by those very same operators, to circumvent those limits as well as the charter bag and size limits. The

Council is faced with a rapidly expanding sector with no defined allocation. It is reminiscent of the period back in the 1980's and 90's when transporter businesses were flooding hunting grounds with too many people and ADF&G and the Board of Game were forced to step in and impose some order. The time is nigh for the Council to take action!

Economic Benefits Overstated

On a different note, page 189 of the Public Review Draft goes through the standard recitation of ancillary economic benefits that charter operations bring to communities where they operate. While this is all well and good, it cheerfully ignores what is probably a stronger countervailing trend to the dispersal of economic benefits. It is standard operating procedure for most guiding outfits to maximize their income by building lodges where they can house, feed and entertain their clients—in part to attract them and in part to keep their cash from “leaking” to the surrounding community. Certainly in Gustavus where I live the economic multiplier seems quite small. On top of that, the overwhelming preponderance of guides and their assistants come from the Lower 48. It seems that most of those charter and self-guided fishing dollars leave rather than bounce around the community. A fairer analysis would acknowledge this issue.

Thank you for the opportunity to comment,

Larry Landry
Box 151
Gustavus
697-2244.

November 29, 2016

IPHC at regproposal@iphc.int

NPFMC at npfmc.comments@noaa.gov

To whom it may concern:

I am sending these comments in response to the discussions about the self guided sport fishing(recreational fishing) impacts and possible actions; the RQE CHP buy up, and the CHP latency potential and actions.

You have heard from me before, so what I have to say is not new. However as the issues and the myriad of scenarios become more complex and with continuous effort to regulate the next concern, it seems to me that there is a very simple fix.

Get rid of the CSP, the GAF, and anything else that connects recreational fishermen to commercial fishermen; make a separate recreational halibut fishing allocation; provide for accountability in that allocation(logbooks and punchcards); and regulate the participants of that allocation. I know this may seem to be going backwards on the road that we have all so laboriously decided to follow; however it is a better way.

Should you decide to do so; it nullifies the self guided advantage and impact on the halibut(all recreational fishermen would have the same rules); it simplifies regulatory rhetoric and paperwork; reduces enforcement confusion and costs; removes competitive issues between commercial fisherman and charter boat operators; and brings equity to all recreational users of the resource. It turns an RQE, if implemented, into a benefit to all recreational sports fishermen and it has no impact on the CHP(limited entry) requirement for charter boats but it does impact the latency issue of those permits by including all recreational fishermen in the allocation.

So again, I say, put all recreational halibut fishing into a single recreational allocation that is separate from the commercial allocation. Then use the science to regulate that allocation to be sustainable. Oh, and make the allocation equitable to the number of users.

And if we want to support the halibut resource even better, vote to implement Kent Huff's "Bycatch use in lieu of area IFQ for commercial fishermen" proposal.

Thankyou for your service on the council and thankyou for considering my comments. I welcome your feedback.

Sincerely,

James S Kearns



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

C3- Self Guided Halibut Rental Boats

1 message

Matt Kopec <matt@fishwhittier.com>

Wed, Nov 22, 2017 at 1:09 PM

Reply-To: Matt Kopec <matt@fishwhittier.com>

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Mr. Chairman and members of the Council.

Since 1998 I've been a charter operator in Whittier. I currently own three CHPs and in addition, have operated Whittier Boat Rentals since 2009.

I believe that areas 2C and 3A are uniquely different in both the charter and rental boat industries. There is no doubt that some 2C charter operators turned toward the unguided rental option to circumvent the CHP program. I believe that this loophole should be investigated. In my experience, this situation is different in area 3A.

As there are currently only a handful of rental boats, the 3A rental industry is in it's infancy. I believe that I own one of, or *the* largest rental boat operation in south-central and I can tell you with certainty that in 3A, rental boats are not catching a significant number of halibut. In Prince William Sound, rental customers book for many reasons and halibut fishing is typically a small part of that decision. Many are interested in sightseeing, cruising, and generally experiencing the Sound. Additionally, navigational boundaries prevent rental boats from traveling to the same areas fished by most of the charter fleet. As a result, success is limited.

Obviously, as charter boats are restricted, there will be an increase in rental operations as well as an increase in halibut interest among renters. I am in support of proactively investigating and identifying rental boat halibut effort, but I do not think that there is a need for restriction at this time. I urge the Council to carefully consider costs and benefits associated with any restriction in the future.

While harvesting halibut in reality is not a large part of the experience for my rental customers, the perceived opportunity to harvest halibut is likely an attractor to customers. I believe that actions which restrict rental boat halibut harvest would hurt business without a justifiable savings in fish.

Additionally, I oppose any restrictive or exclusive vessel registration. I would like to continue to have flexibility in how I use my vessels.

Thank you for considering my comments.

Matt Kopec

Subject: Larry Landry comments, agenda item C3, 11-2017
From: larry@robinssong.net
Date: 11/30/2017 12:38 PM
To: npfmc.comments@noaa.gov

Attached are my comments for agenda item C3.

Thank you,

Larry Landry
Box 151
Gustavus, AK 99826

—Attachments:—

Halibut Comments.docx

14.4 KB

I believe that the Halibut Coalition and our Gustavus based Alaska Halibut Forever have made a convincing case that the self-guided fishing fleet has grown in a very short period to the point that the Council is faced with a rapidly expanding sector with no defined allocation and decisive managements actions are warranted to rein in exploitation of this loophole. To see the IPHC Discussion Paper respond by proposing a new self-guided boat registration strikes us as tepid in the extreme, a default to the time-honored approach of waiting until a problem gets completely out of hand before addressing it. I am most in concert with the Paper's conclusion that problem and purpose and need statements are needed to "help identify approaches other than vessel registration that may provide the Council with information it can use to address the problem."

I was also disappointed to see the Discussion Paper state that there is no data on the number of halibut caught by self-guided boats, since I provided the Council with a slice of such data in the report on the self-guided fleet that I submitted to the Council last year. Doc Warner's lodge in Excursion Inlet provided cumulative harvest information on its website last year (it appears to have since been removed). While not statistically valid, it nevertheless paints a convincing picture about the scale of harvest by self-guided boats. As I said last year:

"The best quantitative picture I can find comes from Doc Warner's lodge in Excursion Inlet—a self-guided only lodge—whose website chronicles most or all of its guests, and until 2014, their catch rates as well. In 2014, the lodge had 105 parties with at least 293 clients who caught 1113 halibut. In 2015, there were 205 parties with at least 593 fisherfolk, and in 2016, 189 parties with at least 569 people. Extrapolating the 2014 catch data to estimate succeeding year harvest yields 2253 halibut in 2015 and 2162 halibut in 2016. In the last two years, lodge clientele have considerably outnumbered the roughly 400 permanent residents of Gustavus. Disquietingly, those clients have increasingly been seen fishing Gustavus residents' traditional spots around Pleasant Island, where we are finding it ever more difficult to put up enough halibut for the winter. Everyone who fishes those waters is observing a marked decline in halibut abundance."

Between Gustavus' example of localized scarcity, the Halibut Coalition survey showing that there are at least 48 businesses offering 170 boats for self-guided operations, and Doc Warner's harvest data providing a window into the scale of the harvest, it is clear that the self-guided fleet and related harvests have mushroomed from low numbers just a few years ago.

I urge the Council to take more decisive and proactive steps to put some brakes on this problem, which could buy it some time to take a more considered approach to the whole issue. An approach that strikes me as simple and logical is to close a key part of the loophole: make guided and non-guided clients of lodges/guiding operations subject to the same harvest limits. The distinction between the two classes of fisherman is really quite artificial. They usually both stay on the same grounds and eat the same meals. In one instance a guide takes the client to fish and in the other they tell them exactly where to go—often using premarked spots on GPS units—and how to fish. Most lodges bend over backwards to make sure that their self guided clients are safe, catered to and on fish. As one of many examples, from the Whaler's Cove website:

“Upon arrival at the lodge, key staff members will assist in showing you to your assigned boat, take you through the operation and emergency procedures, talk over the array of tackle and aid in rigging your rods with what the fish are currently hitting on. The "Fish-Master" will also direct you to the current areas where the guides are fishing. As mentioned above, there is a radio onboard your vessel which you can use to contact the "Fish-Master", lodge or guide boats to assist you if you need any help trying to locate and catch or land a monster, which happens a lot at our lodge. Self-guided anglers will receive plenty of assistance from the dock crew and guides to make your fishing safe and productive.”

Whaler’s Cove and other lodges encourage people to go out with guides for a day or two to learn all the ropes and places to fish before turning to the self-guided option.

The Council instituted charter halibut limited entry permits to place a cap on the swiftly expanding number of charter operators. The self-guided loophole is being aggressively used, not uncommonly by those very same operators, to circumvent those limits as well as the charter bag and size limits. Boat registration is an inadequate response.

From: **john little** <retiredteacher@hotmail.com>
Date: Fri, Nov 3, 2017 at 12:28 PM
Subject: Re: Self-Guided Halibut Rental Boat Discussion Paper
To: Steve MacLean - NOAA Affiliate <steve.maclean@noaa.gov>

Hello Steve, Someone is headed up the right road to get a handle on 'self guided' halibut fishing. It can be used to circumvent the regulations.

Best wishes, John Little

From: Ninilchik Saltwater Charters <nsccharters@yahoo.com>
Date: Fri, Nov 3, 2017 at 11:41 AM
Subject: Private owner boats
To: "steve.maclean@noaa.gov" <steve.maclean@noaa.gov>

I believe because of all of Charter boat restrictions at least at Deep Creek boat launch in Ninilchik, there are at least 10 times more private boats being launched out of Deep Creek. You can verify the numbers from Carrie at Deep Creek Tractor Launch. Charter boat operators cannot even find a place to park their vehicles. I see this problem escalating if more restrictions are imposed on the guided industry. What I see with this boat rental for non charter clients is a way for business to adapt to all of the Charter Operators restrictions. They must find a way to make a living. Also to rent a boat to probably an inexperienced person in our unpredictable waters is an accident waiting to happen. Thanks for reading my concerns.
Capt. James Phillips Ninilchik Saltwater Charters.

Sent from Yahoo Mail on Android

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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>

November 30, 2017

North Pacific Fishery Management Council

Dan Hull, Chair

605 W 4th Ave, Suite 306

Anchorage, AK 99501

Sent via email: npfmc.comments@noaa.gov

RE: C-3 Self-Guided Halibut Rental Boats Registration

Southeast Alaska Fishermen's Alliance (SEAFA) supports moving forward with a registration system for self-guided rental boats. It is important to know who is accessing the resource and how, to properly manage the resource and determine the abundance of the resource. Self-guided halibut rental boats at least in Area 2C appear to be increasing. This has become an issue/discussion point at the International Pacific Halibut Commission (IPHC) on the amount of halibut being harvested. In addition, it appears that reduced port sampling is also providing less data. This is a necessary first step to identify a portion of the industry accessing halibut resources.

Thank you for your consideration.

Sincerely,

Kathy Hansen

Executive Director



November 30, 2017

Chairman Dan Hull
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501
Npfmc.comments@noaa.gov
RE: Self-Guided Rental Boats

Dear Chairman Hull,

The Southeast Alaska Guides Organization (SEAGO) is a non-profit dedicated to the sustainability of the guided 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 appreciates the opportunity to comment on the Council's discussion paper considering the creation of a registration for self-guided rental boats.

In June 2017, a Council motion stated that creating a registration for rental boats would fill a "data gap in fishery participation by a commercial business entity which allows access resulting in significant harvest of Pacific halibut." SEAGO members, some of whom offer motorized boats for rent, are concerned by the Council's statement that this specific means of access results in "significant harvest." Thus far, the significance of harvest by recreational anglers using rental boats is completely unknown and should not be presumed.

The only data on unguided catch rates comes from the Alaska Statewide Harvest Survey, and this does not differentiate between users who rent, borrow, or use their own boat. Furthermore, requiring registration by businesses offering motorized rental boats will be a complicated process which does not fill a gap regarding the extent of those anglers' catch, nor does it address conservation concerns. That must be done through more comprehensive and accurate tracking of unguided halibut catch. If the Council's overarching concern is conservation of the halibut resource, action would be more effectively directed towards tracking the level of all unguided catch and considering a limitation of those opportunities. It is ineffective to continue parsing out the commercial opportunities arising in response to the constantly changing catch measures. This merely complicates enforcement and increases agency work levels.

The motion continued, "[k]nowing how many rental boats there are and where they are spatially distributed will help the Council assess the potential impacts of this sector to communities, the halibut resource, and other stakeholders in the future." In context, SEAGO members are concerned that the Council will fail to account for any positive economic impacts of increased tourist travel to communities with fishing opportunities. Fishing operations



significantly contribute to the Southeast Alaska economy¹ and support various restaurants and shops owned by area residents. SEAGO would prefer to see the Council focus on actions which might improve employment opportunities for local charter captains, business owners, and community members.

Thank you for considering SEAGO's input on this issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Weinstein", with a long horizontal line extending to the right.

Samantha Weinstein
Executive Director, SEAGO
samantha@seagoalaska.org

¹ See Southeast Alaska by the Numbers 2017, Rain Coast Data, *available at* <http://www.raincoastdata.com/portfolio/southeast-alaska-numbers-2017>; *see also* Southeast economy down, with a few bright spots, Juneau Empire, September 29, 2017, *available at* <https://www.ktoo.org/2017/09/29/155901/>.