UNGUIDED HALIBUT RENTAL VESSELS

Initial Review
Sara Cleaver (NPFMC) and Kurt Iverson (NMFS)
DEFINITIONS

Recreational = sport

Unguided (non-guided, non-charter)

Charter (guided)

Unguided angler on a rental vessel

Unguided angler on a private vessel
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
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.
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.
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
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.
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**

<table>
<thead>
<tr>
<th>Unguided (both areas)</th>
<th>Charter (Area 2C)</th>
<th>Charter (Area 3A)</th>
</tr>
</thead>
</table>
| - Two fish of any size daily. | - One fish daily  
- U38-O80 reverse slot limit | - 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>
<thead>
<tr>
<th>Year</th>
<th>Management measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006 (and prior)</td>
<td>Two fish any size</td>
</tr>
<tr>
<td>2007</td>
<td>Two fish, one U32</td>
</tr>
<tr>
<td>2008</td>
<td>Two fish, one U32, except 1 fish limit June 1-10</td>
</tr>
<tr>
<td>2009</td>
<td>One fish any size</td>
</tr>
<tr>
<td>2010</td>
<td>One fish any size</td>
</tr>
<tr>
<td>2011</td>
<td>One fish, U37</td>
</tr>
<tr>
<td>2012</td>
<td>One fish, U45-O68 rev. slot</td>
</tr>
<tr>
<td>2013</td>
<td>One fish, U45-O68 rev. slot</td>
</tr>
<tr>
<td>2014</td>
<td>One fish, U44-O76 rev. slot</td>
</tr>
<tr>
<td>2015</td>
<td>One fish, U42-O80 rev slot</td>
</tr>
<tr>
<td>2016</td>
<td>One fish, U43-O80 rev slot</td>
</tr>
<tr>
<td>2017</td>
<td>One fish, U44-O80 rev slot</td>
</tr>
<tr>
<td>2018</td>
<td>One fish, U38-O80 rev slot</td>
</tr>
<tr>
<td>2019</td>
<td>One fish, U38-O80 rev slot</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Year</th>
<th>Management measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013 and prior</td>
<td>Two fish any size</td>
</tr>
<tr>
<td>2014</td>
<td>Two fish, one ≤ 29&quot;, one trip/day with halibut harvest.</td>
</tr>
<tr>
<td>2015</td>
<td>Two fish, one ≤ 29&quot;, Thursday closed Jun 15-Aug 31, annual limit 5 halibut, one trip/day</td>
</tr>
<tr>
<td>2016</td>
<td>Two fish, one ≤ 28&quot;, Wednesday closed all year, annual limit 4 halibut, one trip/day</td>
</tr>
<tr>
<td>2017</td>
<td>Two fish, one ≤ 28&quot;, Wednesday closed all year, 3 Tuesdays closed, annual limit 4 halibut, one trip/day</td>
</tr>
<tr>
<td>2018</td>
<td>Two fish, one ≤ 28&quot;, Wednesday closed all year, 6 Tuesdays closed, annual limit 4 halibut, one trip/day</td>
</tr>
<tr>
<td>2019</td>
<td>Two fish, one ≤ 28&quot;, Wednesday closed all year, 5 Tuesdays closed, annual limit 4 halibut, one trip/day</td>
</tr>
</tbody>
</table>
• 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”
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

• 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” – p18
RECREATIONAL HALIBUT HARVEST: DATA

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

Area 2C

# of halibut harvested
Recreational harvest by subareas

Area 3A

Kodiak

Central Cook Inlet

Lower Cook Inlet

North Gulf Coast

Western PWS

Eastern PWS

Yakutat

# of halibut harvested

[Graphs showing the number of halibut harvested by subareas from 2009 to 2018]
• Varying interests, motivations, and activities of passengers aboard rental vessels

• No comprehensive database with # of vessels available for rent without a guide, nor with a mount 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)
<table>
<thead>
<tr>
<th>Halibut area</th>
<th>Estimated (minimum) # businesses</th>
<th>Estimated (minimum) # boats</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Area 2C</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Juneau</td>
<td>3</td>
<td>12</td>
</tr>
<tr>
<td>Glacier Bay</td>
<td>7</td>
<td>39</td>
</tr>
<tr>
<td>Sitka</td>
<td>6</td>
<td>10</td>
</tr>
<tr>
<td>Petersburg</td>
<td>7</td>
<td>28</td>
</tr>
<tr>
<td>Prince of Wales</td>
<td>21</td>
<td>57</td>
</tr>
<tr>
<td>Ketchikan</td>
<td>12</td>
<td>97</td>
</tr>
<tr>
<td><strong>Total 2C</strong></td>
<td><strong>56</strong></td>
<td><strong>243</strong></td>
</tr>
<tr>
<td><strong>Area 3A</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CCI</td>
<td>1</td>
<td>13</td>
</tr>
<tr>
<td>Lower Cook Inlet</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Kodiak</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>E PWS</td>
<td>4</td>
<td>14</td>
</tr>
<tr>
<td>W PWS</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>North Gulf</td>
<td>3</td>
<td>7</td>
</tr>
<tr>
<td>Yakutat</td>
<td>3</td>
<td>9</td>
</tr>
<tr>
<td><strong>Total 3A</strong></td>
<td><strong>15</strong></td>
<td><strong>53</strong></td>
</tr>
<tr>
<td>Alternative</td>
<td>Impacts</td>
<td></td>
</tr>
<tr>
<td>------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
</tbody>
</table>
| **Alternative 1**                  | • 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 |
| Status quo. No action.             |                                                                                                                                            |
| **Alternative 2**                  | • 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 |
| Require registration for unguided halibut rental vessels |                                                                                                                                 |
| **Alternative 3**                  | • 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:  
  • 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) |
| Align bag limits between charter and unguided rental vessels |                                                                                                                                 |
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
• 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.