

Enforcement Committee Agenda
February 4, 2014
1pm – 4pm
Marion Room, 4th Floor, Renaissance Hotel
Seattle, Washington

RE: Item C-3

January 28, 2014

Council members and Enforcement Committee members,

I am writing to express my professional opinions as a CHP operator in Area 2C regarding enforcement of halibut regulations. Thank you for this opportunity.

Some of the following comments will be discussed in your agenda, others may not but are directly connected to your decisions. First I would like to comment that I know of at least one CHP that was issued to a guide that does not have clients on his vessel because he has a fleet of kayaks he guides around using his single kayak. He filled out his logbook as required? by the State of Alaska. And now is not bound by the CHP rules. Great for him and his clients but I think the system needs continuity here. I'm not sure of the growth of rental boats that include "guided" by the State statutes but it seems significant due to the rules put forth by the NMFS. In short I agree with aligning the halibut rules to the State definitions.

In addition, I feel the council should go one step further in this area by adopting rules and definitions to mimic the State definitions/rules for preserving the catch of halibut on board a vessel. Basically this allows preserving the daily catch by freezing, canning, smoking or other means that keep the quality for a period of more than 15 days. State definitions from 2013 sport fishing booklet **"preserved fish—fish prepared in such a manner, and in an existing state of preservation, as to be fit for human consumption after a 15-day period, and does not include unfrozen fish temporarily stored in coolers that contain ice, dry ice, or fish that are lightly salted"**. **"bag limit—the maximum legal take per person per day, in the area in which the person is fishing, even though part or all of the fish are immediately preserved; a fish when landed and killed becomes a part of the bag limit of the person originally hooking it."** This does not mean you may take more than your daily bag limit. Let me explain my operation as an example.

I own and operate a charter vessel in Alaska that averages week long trips. We offer fishing as one of many options throughout the week. As you can imagine, catching and eating a halibut is one that is near the top of the list for everyone. While we do not collect boxes of fish by the week, we occasionally catch more than we can consume in a week and thus burdened with having to go to a processing facility, sometimes a day run each way. While at the same time

remote lodge operators are allowed to process the catch essentially removing the possession limit. But at the same time, some of these lodges are also burdened with the transport of these same fish. At the very least I recommend this rule be adopted for CHP holders – we have nothing to hide, nothing to gain in fish, only monetary costs by undo transporting requirements.

Many local Alaskans harvest our winter cache using larger vessels capable of processing at sea. With rising fuel costs, we are spending more per trip. Allowing this definition change would reduce the burden of harvesting this winter cache. Adopting this rule/definition for everyone would not change a thing as far as allowing more catch. It would simply remove the time and financial burden for the few vessels (private and commercial) out there to stay out and enjoy the time they have committed to. I know there are rules for certain types of fishing vessels and my proposed change maybe needs to be looked at with regard to illegal retention. Another point I may make is there are many vessels transporting their catch or winter pack south to the Promised Land. Well, under existing rules, this is illegal. It has and is happening every year with all types of boats transiting from Alaska to the lower 48. Ask around the Washington/Alaska boat community you know. I think you will find many of your contacts (tenders, yachts, tugs, fishing boats) are law breakers. It's up to you to change this simple rule to keep them from being criminals (knowingly law-breaking) and possibly keeping the Canadians from flexing a political muscle by boarding these vessels.

I know that this may not be addressed at this meeting but please find time to consider it in the future. Thank you for your time and consideration.

Sincerely,

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