

**James Kearns**

Alaska Halibut Forever

1/31/2018 9:28:47 PM

---

Comments for the NPFMC, the Charter Halibut Management Committee, and the Halibut Management Committee

I have been in business as a charterboat operator in the Icy Straits, Cross Sound, and Glacier Bay areas of 2C since 1970. Recently I attended the January IPHC 2018 meetings in Portland and in that meeting I proposed a change in the recreational regulations. I proposed a recreational only halibut allocation that is separate from that allocated to the commercial fishing industry. I noted that it would require the un-guided recreational fishery to comply with the same rules and limits as the guided recreational anglers. That way all recreational fishermen would be helping to maintain and manage the halibut resource. I also recommended that there be a one fish, any size, per day bag limit for all recreational fishermen and that if further regulation is required to stay within a recreational fishing only allocation, then annual limits and early or regular closures be implemented. Additionally, I recommended a punch card or a stamp that would have to be turned in or reported so that there could be an accurate method of accounting for the recreational harvest. There was positive discussion in the Conference boards and among the commissioners, however they said that the NPFMC was the proper agency to recommend such changes. Therefore, I am submitting this to you. Hopefully it will be considered along with the letter from the IPHC staff.

I made this proposal because what really affects my business is not the allocation restrictions including bag limits and size limits, but rather the inequity caused by the difference in regulations between guided and unguided recreational fishermen. So I would really like to see you address a change in policy that would remove charterboat sport/recreational fishing anglers from any kind of catch sharing plan with commercial fishermen. And then put them, and all other sports/recreational fishermen, in a separate allocation that fits into the halibut abundance picture, so that bag limits and size limits are the same for all sports/recreational fishermen. Additionally, a halibut stamp or tag for all sports fishermen should be implemented to give a more accurate count of the number of fish that are harvested.

As a council, you have considered an RQE program and you have already implemented a GAF program. Both of these are designed to move some of the commercial quota into the hands of recreational fishermen. Noting that the scientific report at the IPHC meetings estimated the West Coast recreational fishery at 20% of the TCEY, there may not need to be any such programs.

I see no need for a guided recreational angler to have a one fish bonus. This is, after all, a recreational fishery. All recreational fishermen should shoulder an equal responsibility for the health of the resource.

Aside from the health of the resource and the idea that all recreational fishermen(guided or un-guided) should have an equal responsibility to insure that resource, another important issue is that charterboat operators and businesses are not commercial fishing entities. They are actually just coast guard licensed taxi drivers, therefore the recreational fishermen whom they transport are not commercial fishermen and thus they should not be put in a commercial fishing allocation. Now don't get me wrong, I am delighted that this process we have gone through has limited the number of charterboat operators or businesses by putting them in a limited entry program, ie the charter halibut permit program. It is great. It reduces the competition for all of us and I truly appreciate the asset I received that is worth about \$40,000 dollars. But the recreational fishermen who go on mine and every other operator's boats are not commercial fishermen. In fact, it is against the law for them to sell their fish. So put them, and all other recreational fishermen, in a separate allocation group for all recreational fishermen and then they can be a separate group and accountable to their portion of the whole abundance based pie. Then we don't need RQE, GAF, CSP, or the associated regulations. All sport fishing(guided or not) for halibut in Alaska should have its own allocation of the halibut abundance pie, like Canada already does, and the management regulations, whatever is necessary, should be the same for all sports fishermen.

#### **Larry Jarrett**

Larry Jarretts Wild Alaska

1/26/2018 7:40:59 PM

---

48 years guiding and I have seen a lot of this same crap go on so with that said- Drop all the zone BS and adapt a simple rule that for Halibut One fish per day with a 50 inch max length- 3 annual State wide Alaska -this gets you some where instead of all the problems caused by zones, etc- no person needs more than 3 fish- either we start asap or face the terrible reality soon- Thanks You Larry Jarrett

**Larry Jarrett**

Larry Jarretts Wild Alaska

1/26/2018 7:40:59 PM

48 years guiding and I have seen a lot of this same crap go on so with that said- Drop all the zone BS and adapt a simple rule that for Halibut One fish per day with a 50 inch max length- 3 annual State wide Alaska -this gets you some where instead of all the problems caused by zones, etc- no person needs more than 3 fish- either we start asap or face the terrible reality soon- Thanks You Larry Jarrett