

### **Request regarding Staff Tasking**

Our group, Alaska Halibut Forever, requests 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 curtailing this sector.

See the submission of comment on Agenda item C3 by Larry Landry, which includes a report on sport fishing lodges that provide self-guided fishing. That information is based largely on fishing lodge internet websites and to a small extent on local knowledge. We recognize that the list is under-inclusive. It does not include information that we have about the variety of strategies used in evading both the charter halibut permits (CHPs) and the charter regulations.

Some of the businesses that offer self-guided fishing received the free gift of original issuance charter limited entry permits (CHPs) and decided to also offer self-guided fishing, minimally different from their charter trips. There are a number of examples, but see these websites: 1. *True North Charters (Gustavus, Alaska)*, look under "Fishing," then go to "Self Guided Halibut Fishing; 2. *Whalers Cove (Angoon Alaska)* – look under "Fishing Packages," then "Self Guided Salt Water Fishing" where you find a long list of the assistances provided. Both of these outfits suggest to clients that they can go out with a guide first for one or two days to learn, then go on their own. True North does not show this option on their website; in the past it offered self-guided from off-loaded skiffs, but without showing that on the website.

We are aware that in 2013 the Council attempted to close the loopholes through a new "definition of a fishing guide." This caused discontinuation of some practices, chiefly the practice of off-loading skiffs (sometimes without motors or even oars) from a mother boat so that clients could board them and technically fish "self-guided." But many other strategies are used and the self-guided sector is growing. We know this is a complicated problem but, if not curbed soon, regulation of sport fishing businesses in Southeast Alaska will become an illusion. Perhaps it already is. One possibility to consider is requiring self-guided sector clients to have the same bag and size, etc., regulations as the charter sector.

In the current data collection system, self-guided harvests are not distinguished from other non-charter harvest. However, ADF&G graphs on pp. 217 -218 of the RQE Public Review Draft show that in 2013 the non-charter sector harvest in Area 2C began to exceed that of the charter harvest. The same is not true for the relationship of charter to non-charter harvests in Area 3A. Our organization is concerned about this growing sector because it adds to the fishing pressure that can cause depletion of halibut in local areas near coastal communities.