

NPFMC C3 Charter Halibut Annual Permit Registration Public Comment – APRIL 2018

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**Patrick Bookey**

Luck of the Irish Charters  
3/29/2018 3:07:43 PM

Gentlemen and Ladies; I write to you regarding the Halibut Charter Permit registration proposal. I am opposed to this proposal. It appears this is a possible method to remove transferable permits, without compensation, from the charter fleet. Why have you allowed the non-transferable permits to be leased? I have a transferable permit and am the original owner. Each year you allow non-transferable permits to be fished by someone other than the original permit holder resulting in we now fish 5 days a week, before weather days. This results in one third of my revenue disappearing to some new guy that shouldn't be fishing at all. This practice also makes it much more difficult to sell my permit as non-transferable permits can be leased cheaper. I propose the following: 1. The fishing of non-transferable permits be stopped from leasing. 2. If non-transferable permits are allowed to be leased the must not be allowed to be fished more than 15 days per season. 3. Register only the non-transferable permits. Then you will instantly know how many days you have added to the charter industry, hopefully unintentionally. 4. Restrict only the non-transferable permits to the limited days per week. 5. Limit the leased non-transferables permits to a one fish, or a no fish limit to keep the charter fleet within the harvest level. Should this not provide enough reduction then and only then reduce the transferable permits catch levels. I have been charter fishing since 1981. The only reason you are restricting me is because you want me out of business! Each and every year you further restrict my transferable permit and still allow the leased non-transferable permits to be fished for more than the 15 days that qualified them, for a non-transferable permit. What good is your regulation when you don't enforce them. You proposed registration doesn't consider when a Captain becomes injured or is forced to restrict their charters because of personal, medical, or emergencies. Stop allowing the non-transferable permits to be leased. Webster's define non-transferable as being used only by the original holder of the permit. Possibly someone on the council should learn how to READ! Patrick M. Bookey

**Capt. Kevin Burchfield**

Juneau Charter Boat Operators Association  
3/30/2018 9:47:44 AM

The Juneau Charter Boat Operators Association does not see a need for this rule to be passed. This would just add more red tape to our industry and there is such a small segment of permits that would be affected we believe it does not warrant taking action.

**Jim Martin**

Alaska Charter Association  
3/30/2018 11:39:28 AM

Please see attached file-

*Attachments:* [April ACA Comment NPFMC Item C3.pdf](#)

**Tom Gemmell**

Halibut Coalition  
3/30/2018 11:13:35 AM

Please see attached.

*Attachments:* [20180330 C3 Annual CHP Renewal from HC.pdf](#)

**Samantha Weinstein**

Southeast Alaska Guides Organization  
3/29/2018 7:00:23 PM

*Attachments:* [C3 CHP Registration.docx](#)

**Kathy Hansen**

Southeast Alaska Fishermen's Alliance  
3/28/2018 9:10:47 AM

*Attachments:* [Annual Registration Halibut Charter Permits 3.26.18.pdf](#)

**MCapt Ken L Larsion**

SANITY CHARTERS

3/29/2018 1:36:50 PM

I have a Transferable CHP that I run out of Valdez and Ellamar, Alaska. On occasion I have leased it for part of the season as my boat maintenance and physical limitations for surgeries happen. That means I have had one or more other charter operators using my permit. I would prefer that you not require annual registration of different skippers as a result. If that is not tenable, then I would prefer that you require annual registration of ONLY non-Transferable permits as they have been badly over used as full time permits. They were originally intended to be used by skippers that only made up to 15 trips per year and were to expire when those owners ceased to use them. The full time use of those part time permits has certainly exacerbated catch rates in our limited pool. If none of the above is possible then at least include a provision for timely email or call-in notice by the permit owner during the season if we have to use another charter operator to either run our charter or lease our permit. Thanks for your consideration. Capt Ken L Larson (907) 251-7522