June 23, 2017

Mr. Sam Cotten, Commissioner  
Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

Dear Commissioner Cotten,

The North Pacific Fishery Management Council has received public testimony requesting that the Council consider ways to address data gaps in self-guided halibut sport fishing in regulatory areas 2C and 3A. Currently, some unknown number of entities are offering opportunities for clients to rent small boats to fish for halibut without a registered guide aboard. This allows the clients to harvest halibut at the unguided limit of two halibut of any size per day, rather than area-specific size and number limits set for guided anglers. Because we are unable to determine the number of entities offering self-guided fishing, or the number of vessels that are available for rent, the impact of these operations is not known.

Through this letter, the Council is requesting assistance from the Alaska Department of Fish and Game to explore ways to define this sort of self-guided commercial entity, and explore mechanisms to create a registration for motorized rental boats in regulatory areas 2C and 3A that intend to harvest halibut. The intention is to better understand the number and distribution of these operations, and the number of vessels available to assess the potential impacts of this sector to communities, the halibut resource, and other stakeholders.

More specifically, we request assistance from ADF&G staff to work with NMFS Alaska Regional office staff and Council staff to prepare a discussion paper that can provide a definition of a self-guided rental boat and mechanisms to move to a regulatory amendment creating a registration system, if the Council concludes that this action is warranted. The Council staff lead on this project is Steve MacLean.

Sincerely,

David B. Witherell  
Executive Director