



REGULATORY PROPOSAL 2020
Alaska Recreational Fisheries

SUBMITTED BY:
JAMES KEARNS
RECREATIONAL FISHERMAN AND CHARTER GUIDE
UNITED STATES OF AMERICA
31 OCTOBER 2019

IPHC Regulatory Areas that may be affected: 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E
Fishery Sector: Recreational

EXPLANATORY MEMORANDUM

Dear IPHC commissioners,

Hello, my name is James S Kearns and I live in Gustavus, Alaska. I have been a recreational fisherman my whole life and a charter boat guide since I was 18. I have fished and guided in the Glacier Bay, Icy Straits, Cross Sound, and GOA areas over the course of those 50+ years. I have made numerous requests and recommendations to the IPHC, the NPFMC, and the NMFS since the inception of Recreational Halibut fishery and Charter Halibut Operator/Business regulations in the early 2000's. Additionally I have written to Alaskan governors, Alaskan congressional and legislative representatives, The US Secretary of State, and the US Secretary of Commerce with a common plea to consider removing recreational halibut regulation differences from guided and unguided recreational halibut fishermen. Why? Because I have always considered recreational fishermen, who have the same license requirements and the same equipment requirements, to be the same, whether they are guided or unguided. I have also never been able to buy into the idea that a recreational fisherman should be regulated in a catch sharing program along with commercial fishermen. Why? Because I have always considered a Coast Guard licensed boat operator to be a commercial boat driver rather than a commercial fisherman if he/she takes customers sport fishing, or a commercial hunter if he/she takes customers sport hunting, or a commercial diver if he/she takes customers sport diving. And anyone who fishes, or hunts, or dives for sport, rather than to sell what they catch, kill, or collect, is certainly not a commercial harvester, whether they pay someone to take them to do the harvesting or not.

Therefore I ask you all to consider the following proposal in order to responsibly manage the recreational halibut fishery in Alaska:

First; create a recreational halibut allocation that includes all recreational fishermen, guided or unguided. This allocation needs to be no less than 40-50% of the annual TAC so that recreational fishermen have an equitable percentage of the halibut resource harvest.

Second; establish a 1 (one) halibut of any size daily bag limit for all recreational fishermen.

Third; establish an annual limit that is based on the recreational halibut allocation for each area, ie. 2C and 3A.

Fourth; stop encouraging recreational take of the Big Fat Fecund Female Fish (BFFFF) to enhance the best reproductive success for the resource by setting a penalty for keeping a fish over 65 inches in length. The penalty would be to reduce the annual limit for a fisherman by 1 (one) for every halibut kept that is over 65 inches. And if a fisherman's final fish of his/her annual limit is a fish over 65 inches, the penalty would be applied to the following year.

Fifth; implement a halibut tag or punch card that requires all recreational fishermen to record the location and size (length in inches) of each halibut caught and kept. That punch card or tag would have to be sent in to ADFG as soon as it was filled or by Jan 15 of the following year. This would give a remarkable accountability of all halibut kept by the recreational sector. The card/tag would be purchased from the state of Alaska online like all licenses and stamps will be in 2020. If the size penalty (fourth item) was in force for an angler, it would show up and be applied when that person wanted to purchase the next year's card/tag.

This proposal would require a change in the regulations that currently exist in Alaska to a one halibut a day bag limit for all recreational fishermen in all areas. It would get rid of the size limits (except for the over 65 inch part of the proposal), it does not address charter boat weekday closures currently in effect in area 3A or the one trip a day limit also in 3A although those may not be necessary if all recreational halibut fishermen have the same bag limits, and it puts an annual limit (currently in effect for guided anglers in 3A) into effect for all recreational fishermen. It does not change the CHP requirement, the guide/guide business registration requirement, or the charter vessel logbook requirement for charter guides and businesses since these are part of managing that limited entry type of business. But it does not allow any harvest of the commercial allocation through the GAF program, which, by the way, is not allowed in Glacier Bay National Park because commercial fishing is not allowed in the Park. It does, however, make the recreational fishery equitable for all recreational fishermen, recognizes the financial impact of recreational fishermen to the economy, and requires all recreational fishermen to participate in responsible abundance based management of the halibut resource.

Thank you for your consideration. This letter was also sent to the NPFMC for their consideration in their Dec 2019 meetings and to their Charter Halibut Committee

meeting in late October. I hope we can all make this a more equitable way to address recreational halibut fishing in Alaska and provide for all halibut stakeholders an opportunity to participate in the management of this amazing resource.

Sincerely, James S Kearns PO Box 148 Gustavus, Alaska 99826

SUGGESTED REGULATORY LANGUAGE

Nil.