



## Stakeholder comments on IPHC Fishery Regulations or published regulatory proposals

PREPARED BY: IPHC SECRETARIAT (B. HUTNICZAK; 11 DECEMBER 2023, 12, 16, 19 & 21 JANUARY 2024)

### PURPOSE

To provide the Commission with a consolidated document containing comments from stakeholders on IPHC Fishery Regulations or published regulatory proposals submitted to the Commission for its consideration at the 100<sup>th</sup> Session of the IPHC Annual Meeting (AM100).

### BACKGROUND

The IPHC Secretariat has continued to make improvements to the [Fishery Regulations](#) portal on the IPHC website, which includes instructions for stakeholders to submit comments to the Commission for its consideration. Specifically:

*“Informal statements or comments on IPHC Fishery Regulations or published regulatory proposals can be submitted using the form below up until the day before the IPHC Session. Submitted comments will be collated into a single document and provided to the Commissioners at the IPHC Session.”*

Comments may be submitted using the [IPHC Stakeholder Comment Form](#). Attachments may be sent to [secretariat@iphc.int](mailto:secretariat@iphc.int).

### DISCUSSION

[Table 1](#) provides a list of the stakeholder comments which are provided in full in the Appendices. The IPHC Secretariat does not provide commentary on the statements, but simply collates them in this document for the Commission’s consideration.

**Table 1.** Statements from stakeholders received by noon on 21 January 2024.

Appendix No.	Title and author	Date received
<a href="#">Appendix I</a>	Fabian Grutter, commercial fisherman	3 October 2023
<a href="#">Appendix II</a>	Shawn McManus, Deep Sea Fishermen’s Union of the Pacific	25 October 2023
<a href="#">Appendix III</a>	Thomas Russell, directed commercial fishery in Canada	24 December 2023
<a href="#">Appendix IV</a>	Tucker Banner, recreational fisherman	12 January 2024
<a href="#">Appendix V</a>	Joel Kawahara, Coastal Trollers Association	15 January 2024
<a href="#">Appendix VI</a>	Darryl Bosshardt, Pybus Point Lodge	18 January 2024
<a href="#">Appendix VII</a>	Joel Steenstra, Alaska Wide Open Charters	18 January 2024

<a href="#">Appendix VIII</a>	Allen Landeen, Taylor Charters	19 January 2024
<a href="#">Appendix IX</a>	Charles McNamee, Angling Unlimited Inc.	19 January 2024
<a href="#">Appendix X</a>	Scott McKelvey, Waterfall Resort	20 January 2024
<a href="#">Appendix XI</a>	Greg Kain, Kain's Fishing Adventures	20 January 2024
<a href="#">Appendix XII</a>	Haley Janttie, Eagle Charters	20 January 2024
<a href="#">Appendix XIII</a>	David Creighton, Shelter Cove Lodge	21 January 2024

**APPENDICES**

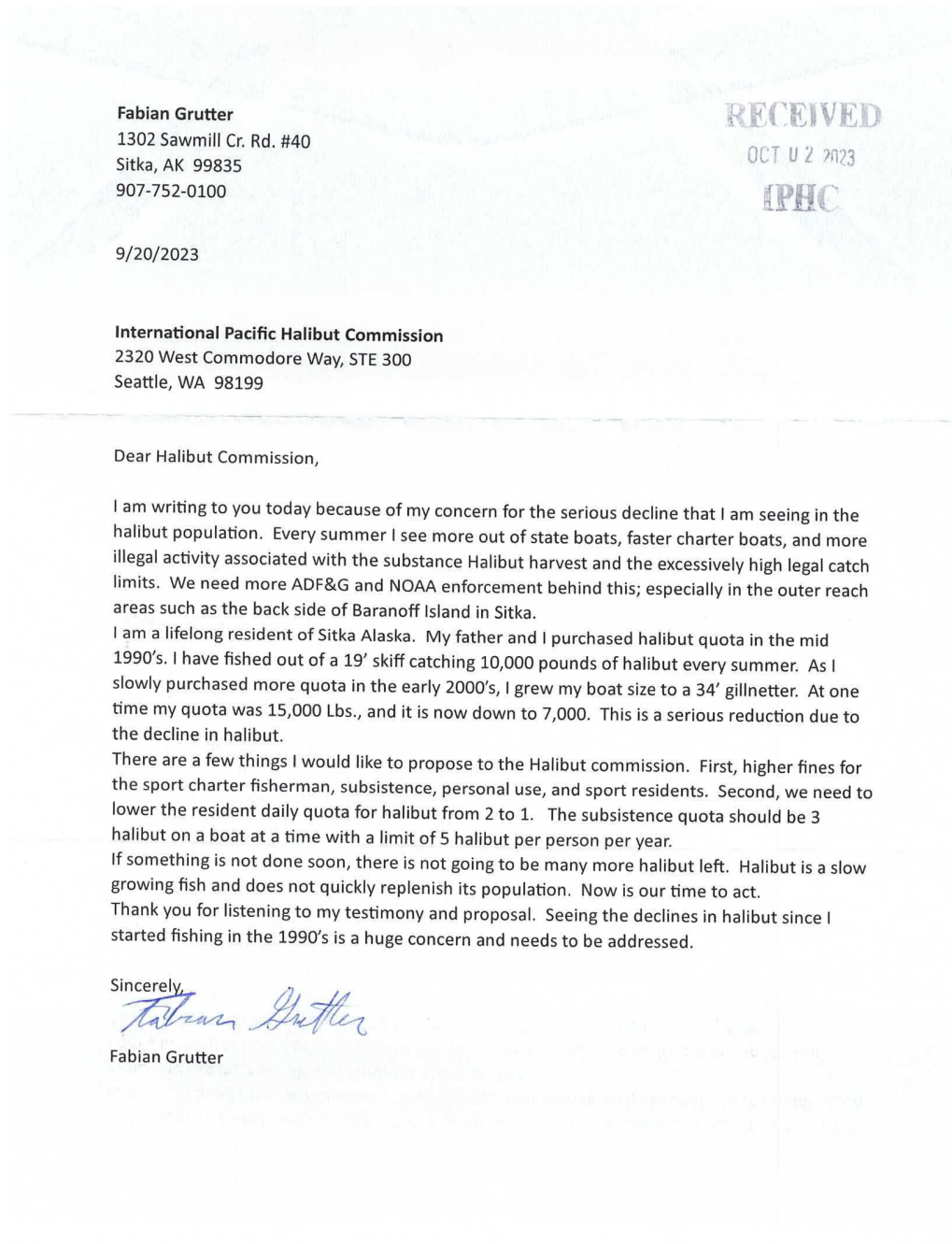
As listed in [Table 1](#).

**APPENDIX I****Statement by Fabian Grutter, commercial fisherman**

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to

IPHC Fishery Regulations

Submitted comment



**APPENDIX II****Statement by Shawn McManus, Deep Sea Fishermen’s Union of the Pacific**

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to      Section 5 - Mortality and Fishery Limits

Submitted comment

In the event that a FISS is not conducted in an IPHC Regulatory Area(s), the TAC for the un-surveyed Regulatory Area(s) shall not be increased using extrapolated historical FISS data for the following fishing season. For example, in 2021 there were no FISS conducted in any of the Area 4 Regulatory Areas. Yet, despite the lack of current FISS in those Regulatory Areas, the TAC was increased in many of those Areas using extrapolated FISS data for the 2022 fishing season. Those same Regulatory Areas are again lacking FISS for 2023.

We are concerned that the lack of annual FISS data does not provide the critical up to date data necessary to increase and effectively manage a Regulatory Area(s) TAC. In fact, from a conservation and sustainability standpoint, without the annual FISS data, we are hardly comfortable with a TAC status quo for the affected Regulatory Area(s).

The abovementioned problem is seen as a harvest control rule.

“No IPHC Regulatory Area shall see an increase in TAC without an annual FISS which indicates the action of raising the TAC is warranted”

**APPENDIX III****Statement by Thomas Russell, directed commercial fishery in Canada**

Section of IPHC Fishery  
Regulations or regulatory  
proposal reference the comment  
will refer to

Section 9(2) - Commercial Fishing Periods

Submitted comment

I would like to see the directed fishery for Pacific halibut open earlier in the day. The current practice of a noon opening limits what can be accomplished in the first day. Many of the vessels are all ready standing by at daylight, and setting at noon makes for a very long day. Setting earlier would also raise efficiency of time spent opening day, allowing for a more complete soak time on the gear. I feel like 08:00am opening would allow for daylight conditions to set gear, meeting safety and enforcement objectives.

I propose:

Unless the commission specifies otherwise, commercial fishing for Pacific halibut in all IPHC areas may begin no earlier in the year than 8:00am local time DD-MMMM.

## APPENDIX IV

### Statement by Tucker Banner, recreational fisherman

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to

Section 5(2) - Mortality and Fishery Limits - California's Pacific Halibut Quota

Submitted comment

Hello, I am Tucker Banner. I am a California resident, but also stay in Alaska a few months in the summer. I am deeply concerned with California and the direction our fisheries are going. Recently we had a change in the Salmon fishery, which has been completely closed. The rockfish has been changed to the 50 fathom line, which is roughly 300 feet deep and beyond. Sturgeon has been drastically reduced in size limit and fish amount per year. Many anglers can not safely take their boats to the 50 fathom line. People in California, especially in Northern California, in small towns such as Shelter Cove, Trinidad, Eureka, Crescent City, Fort Bragg, and many others rely on the ocean for food, or at least for a portion of their food. Personally I love eating fish, crab, clams, and all the other delicacies our oceans hold. Halibut is a very fun fishery, and it is absolutely delicious. I fish for Halibut out of Deep Creek and Anchor Point in Alaska. I fish for Halibut out of Eureka in California. The main issue I want to discuss is California's Pacific Halibut Quota. Our share is truly ridiculous. I am not trying to be rude or dramatic, but to my knowledge Alaska has no quota. Washington's quota is 291,950 pounds. Oregon's quota is 275,214 pounds, and around 1/10th of those individual quotas is what California is allocated. California's quota is 39,520 pounds. I understand halibut migrate and are more common the farther north you go, but California deserves a larger piece of the pie. I know California is drastically different than Alaska, Washington, and Oregon. I understand California is often hated. I do not like our policies or our politics, but I am concerned about the well being of fishermen. We are all the same. We think the same. When I tell people in Alaska I'm from California they tell me not to bring my friends. Not all Californians are crazy. We just want an opportunity to fish and feed our families. In Trinidad and Eureka there are guides who fish halibut and we have one or two commercial boats that fish halibut. Many people rely on this fishery for food and even their livelihood. The economic benefits to these small cities also rely on people traveling to them to fish. The restrictions on our rockfish depth crushed many of these cities. Please listen to my pleas and give California a fair amount of quota. Washington and Oregon each have 7 times the amount of quota we have. Small Northern California communities rely on this fishery for food. Whoever is reading this, if you have been to Northern California it is very similar to Washington, Oregon, and Alaska. We are the same, and we deserve and want more quota. We respect the fish as much as anyone else. I fillet the halibut even past the belly and then cut the membrane off. I keep the cheeks! The fish are respected and every portion is used! California deserves at least half the quota Oregon and Washington has. I believe it should be divided equally three ways, but I understand Washington and Oregon would not love that idea. Fishing is important for my family and I and millions of other Californians, who are just like you. Our season in California ended in the beginning of August this year, and doesn't open until May. Please let us target these fish longer by allocating more quota to California. An argument would state California waters do not have enough halibut to sustain a larger quota. I disagree. We used to have many

commercial ships who targeted the fish out of Eureka and Trinidad 50 some years ago. Studies have shown halibut migrate, and therefore we can handle a larger quota. Halibut have been caught from the Oregon border all the way to San Francisco near the Farallon islands. That is 300 plus miles of halibut barring coastline. The numbers are drastic. Please consider giving California more quota. Thank you very much, Tucker Banner.

Alaska Quota: Unlimited. Washington Quota: 291,950. Oregon Quota: 275,214. California Quota: 39,520.

**APPENDIX V****Statement by Joel Kawahara, Coastal Trollers Association**

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to IPHC-2024-AM100-PropC1

Submitted comment Coastal Trollers Association (CTA) supports IPHC-2024-AM100-PropC1, the Makah proposal for a TCEY of 1.65 Million pounds for year 2024. CTA notes the O32 WPUE (IPHC-2024-AM100-10, Figure 4) shows a 10% increase over 2023, strongly suggesting there are no underlying conservation concerns with maintaining the status quo in area 2A.



## APPENDIX VI

### Statement by Darryl Bosshardt, Pybus Point Lodge

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to Section 5 - Mortality and Fishery Limits

Submitted comment



January 18, 2024

**SUBJECT: Annual Harvest Limits of IPHC Fishery Regulations**

To Whom It May Concern:

Pybus Point Lodge is a remote fishing and adventure lodge located on the southern end of Admiralty Island. We offer 4-day/night all-inclusive adventures which include fishing and enjoying all the beauty that Southeast Alaska has to offer. We typically run 7 guided boats each day (8:00-3:30) with about 38 total guests. We also have several smaller "skiffs" that we make available to guests in the evenings for sightseeing and exploring the area on their own.

Before the introduction of guided halibut "day-closers" in 2023, these smaller skiffs were primary used for exploring the bay and looking for wildlife. Even though our guests have always been able to use these "self-guided" skiffs for additional fishing after harvesting one, size-regulated, guided halibut during the day, it was a seldom occurrence. Therefore, most of our guests each season would harvest 1, smaller-sized halibut each day of around 35-39". Although our guests all knew they could harvest 2 halibut of any size unguided, most of our guests have always been happy with just the 1, smaller, guided halibut.

Unfortunately, that all changed in 2023 with the introduction of day closures which was much more of a Pandora's Box than any of us would have guessed. As soon as the "No Halibut Monday" was introduced, many of our guests that were previously happy with 1 halibut per day of a smaller size, opted to use our "self-guided" skiffs fishing. So instead of harvesting one smaller halibut with our guide, they would regularly return to the dock with 2 oversized. And although the closure was for just 1 day a week, after catching 2 per-day, with no-size-limit, many would opt for self-guiding the rest of their trip.

Years ago, before the rapid advancement of GPS and sonar, targeting halibut grounds without a guide was much more difficult. This made the historic success of self-guided much lower than it is today. However, with the high-quality GPS and sonars of today, a repeat Alaskan fisherman has no trouble harvesting 2 over-sized, breeding, halibut each day. This means, that with the introduction of guided halibut day-closers, rather than reducing the number of harvested halibut, the number has dramatically increased. And not just the number of halibut, but they are targeting the larger breeding stock that we all desperately want to preserve.

It is our hope that the commission will take this into consideration and universally implement a Halibut bag limit of 1 for guided AND/OR unguided sport fishing. Furthermore, if a day-closure(s) is necessary for preservation, then implement that day-closer equitably for all guided AND/OR unguided fishing.

Sincerely,

Darryl Bosshardt,  
General Manager  
[darryl@pybus.com](mailto:darryl@pybus.com)  
Office: 1-800-947-928

## APPENDIX VII

### Statement by Joel Steenstra, Alaska Wide Open Charters

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to      Section 5 - Mortality and Fishery Limits

Submitted comment

Dear IPHC,

My name is Joel Steenstra, owner of Alaska Wide Open Charters out of Craig, Alaska in 2c. Next season will be my 21st season as a Captain for halibut out of Craig. We are a family run business and have two boats. I guide clients, my wife cleans and cuts fish, and my three children help her and are very involved in the business. We take 8 clients at a time and provide fishing, lodging, and fish processing for them. We are year round Alaska residents and are very active in our community. Our other Captain we employ is a born and raised Alaskan, and a year round resident of Craig where he also raises his family of four children.

Halibut has become a source of stress for both myself and my clients. As we have watched limits get cut and days of the week close, we no longer have security in our business that we once had. Clients are constantly asking what the limits will be and if days of the week will be closed. It's much harder for us to have a good product for our customers when we have so little halibut to offer them. As a result of the day of the week closures, I have been using a large amount of GAF fish to keep them happy which is very costly to my business. Long term outlook will not be good for the local, Alaska owned small businesses like myself who do not have extensive advertising campaigns and who do not live south near populations centers to constantly be recruiting new clients.

We are particularly at a disadvantage when other areas like 3a get a one halibut of any size while we get stuck in the chicken patches for small halibut. We have heard that Canada has better limits than us too. And our clients are very much in tune to what limits are in other areas.

Another big issue is the restrictive limits are pushing many clients towards self guided operations. While we take cut after cut, self guided operations continue to grow with zero cuts. Many of us have been fishing out there for decades with constant reductions in limits, while new self guided operations show up out of the blue and enjoy zero cuts at our expense. We simply cannot compete with businesses who fish similar waters as us and have a two fish, no size limit, while we have a 1 fish, reverse slot limit with day of the week closures. And all the pain we endure by taking cuts is simply going to the self guided industry with no savings to the resource.

I ask that you protect the small businesses in Alaska. Thank you.

Joel and Leanne Steenstra  
Alaska Wide Open Charters

## APPENDIX VIII

### Statement by Allen Landeen, Southeast Alaska Business Operator

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to IPHC Fishery Regulations

Submitted comment



January 18, 2024

Attn:  
Jon Kurland, Chair  
Paul Ryall, Vice Chair  
Richard Yamada  
Robert Alverson  
Neil Davis  
Peter DeGreef

Re: The struggle we face on lowering halibut allocations as businesses operating in Southeast Alaska

To whom it may concern my, name is Allen Landeen. I am the Operations Manager of Taylor Charters located in Gustavus AK. We run 8 boats and can serve up to 48 clients at a time. Operating primarily 5 day fishing trips. I am writing to express my concerns over the pending Halibut allocation and its impact on the business I manage.

I have been a captain in Gustavus for the past 5 seasons and have served several "types" of guests including people who have already been fishing annually/ semiannually in Gustavus for many years, people who have been fishing in many different areas of Alaska, and people who are on their first trip to Alaska. In Gustavus we do have people who love to fish for salmon and different rockfish species, but without exception in Gustavus people come primarily to fish for Halibut and other species are seen as welcome additions to their primary reason to fish out of the Gustavus Port.

Each year before the season starts and even each week as new guests are arriving is a period of anxiety about how the guests will feel on day one when we explain the halibut regulations for this current season. As most guests book at least one year in advance and often are booking two and even three years in advance, we have no way of reliably telling them at point of sale of the trip what the upcoming seasons limits are going to be.

It is very common for the first day which is full of anticipation and excitement to go out and catch some amazing Halibut to struggle to explain to clients how the limits this year are (fill in the blank). I often spend the drive to our first fishing spot on day having to answer a lot of questions about "why the size drop from last year", or statements like "when we booked the trip the limit was a lot bigger", or "you never said there would be a day closure..". I then have to spend a significant amount of time through their trip trying to explain in simple terms the complex system of allocation and international treaties and having to really work hard to prevent them from feeling like they have been lied to when in fact we have no idea what the regulations are going to be when we sell the trip.

Allen Landeen  
Operations Manager

(801)654-6868  
Box 53 Gustavus, Alaska 99826

allen.landeen@gmail.com



I've have several groups that had been fishing in Gustavus loyally for many years leave to go try somewhere else with better size regulations. The day closure was really a difficult additional to smaller size limits and I had a group of 6 guys who had been to gustavus annually for 16 years said enough is enough with this the size we can keep is shrinking every year and now they are shutting days down? We have to go somewhere else.

We have had to adapt part of our business model to offer self guiding options as we have lost guided clients which adds a whole additional aspect of conflict with people coming back after being told its 1 per person under 38 and then they see a deck full of larger halibut and smiling faces and we have to explain how for some reason because they don't have a captain on their boat they can keep more and larger fish.

We don't know what to do on our end outside of try to supplement with purchasing GAF permits which adds to the complexity and workload with strict high fines for any late submittals or mistakes. Im grateful we have that option and it has been a saving grace to be able to offer it but would and should not be necessary to even have that as the way to dig ourselves out of a hole we should not have been placed in.

In Gustavus specifically we don't have the luxury of short drives to fish for salmon, and when people book here specifically because they want to be able to fish for Halibut on inside passage waters because they get seasick, and we tell them they cant even fish for halibut because of a day closure and we have to go out to the open water to salmon fish, it is really difficult to convert people into being return clients, leading to more advertising costs to find new people to come in the future.

Please understand how this trend of smaller size limits and day closures will impact our livelihood in Gustavus. I'm not the owner of the company, but I am the operations manager and intend on buying the company in the future. When I look at this trend, I wonder what will halibut regulations be in 10 years from now and is this even a sustainable business plan for me to pursue? Continuing down this path will put the interests of the guided sportfishing fleet in Gustavus in serious Jeopardy if it continues.

Allen Landeen  
Operations Manager

(801)654-6868  
Box 53 Gustavus, Alaska 99826

allen.landeen@gmail.com

**APPENDIX IX****Statement by Charles McNamee, Angling Unlimited Inc.**

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to

Section 28 - Recreational (Sport) Fishing for Pacific Halibut—IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E

Submitted comment



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January 19, 2024

My name is Chuck McNamee. I am the owner of Angling Unlimited Inc., which is a charter fishing company in Sitka, Alaska. Angling Unlimited has been in operation in Sitka since 1995, and currently welcomes approximately 1400 guests each summer to enjoy an Alaskan multi-day fishing experience.

One of the main reasons our guests choose to fish Alaska versus any other part of the world is to catch halibut. It goes without saying that halibut is important not only to us as business owners that are supporting the local Southeast Alaska communities, but to the guests that visit during our summer fishing season. Over the past few years, as the regulations for halibut have tightened to the point to which we are now having day closures, and size restrictions that are requiring us to keep only the smaller fish, the excitement for halibut fishing in Sitka on a guided trip is fizzling and making it a difficult selling point.

Some of our guests that used to enjoy the safety and comfort of halibut fishing as part of a guided trip are exploring self-guided charters or searching for other areas in Alaska or Canada that have regulations that better suit their interests, or just choosing to stay home. As a business owner I am exploring all options to keep our guests satisfied with our guided fishing experience. All options such as GAF come with a price tag that I think will be unacceptable to most fishing guests.

I understand that regulations are necessary to protect the health of current and future halibut resources. I will continue to do all I can to ensure that Angling Unlimited provides the best possible guided Alaska fishing experience to all our guests. I will ask that you please set halibut regulations carefully so those of us in the charter fishing industry can have a chance to keep our summer fishing guests excited to visit Southeast Alaska.

Sincerely,

Chuck McNamee

## APPENDIX X

### Statement by Scott McKelvey, Waterfall Resort

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to

Section 5 - Mortality and Fishery Limits

Submitted comment



International Pacific Halibut Commission  
2320 West Commodore Way  
Suite 300  
Seattle, WA  
98199

01/18/2024

Waterfall Resort  
1249 Tongass Avenue  
Suite A  
Ketchikan, Alaska  
99901

To whom it may concern:

Please let me start out by introducing myself. My name is Scott McKelvey, and I am the General Manager for Waterfall Resort which is located in Area 2C of Southeast Alaska. Waterfall Resort is a large operation that has been in business as a fishing lodge for over 40 years, and I have been affiliated with them for last 33 years. We have 27 boats and can accommodate up to 92 guests at one time. Being a remote location that is not connected to any town via roadway, we rely heavily upon the many small local businesses for supplies, transportation needs between Ketchikan and our property, hotels in Ketchikan for guest stays before and after visits to our property, city sales taxes generated, as well as employing many Alaskan residents.

This being said, I must voice my concern over the continued reductions within the guided halibut fishery. Over the many years, I have witnessed a number of ups and downs in all the fisheries and I am literally on the front lines of hearing what our clients have been saying. Over time, one of the largest amount of complaints that I have fielded has to do with the ever tightening of halibut size limits, recent day of the week closures, and why other locations (Areas) are able to have higher daily possession limits. As best as I can, I try to educate our guests as to some of the reasoning of each, but in the end it makes it very difficult to compete with other areas in and out of the State of Alaska. Our company already has been offering GAF permits to guests to try and help compensate for the day closures we have had, as it is very difficult to talk customers in to booking when there is a "Day Closure" over their stay. But, that



becomes expensive fast! Also an area of concern has to do with size limits, and then trying to convince guests to come and catch a halibut that keeps getting smaller. For these above reasonings, we have already lost many of clients, as I am sure most other lodges have felt the same pinch, to other Areas in and out of Alaska, or are starting to see them move over to the mainly unrestricted/unregulated (and quickly growing) unguided sector.

In closing and to summarize, my fears are that if we are faced with more stringent regulations in the guided sport industry, it will become even more difficult to book and/or rebook potential clients in the future. If this does indeed happen, it not only will affect our businesses and the tourism industry as a whole, but greatly affect the many local businesses and small communities that heavily rely on the guided fishing industry. The only industry that may prosper off this would be the non-guided sector which do not have the same restrictions and/or regulations or monitoring, and this will actually cause a higher harvest amount and be an even bigger issue in halibut abundance in the future.

Very Respectfully,

A handwritten signature in black ink, appearing to read 'Scott McKelvey', written over a faint, larger version of the same signature.

Scott McKelvey  
General Manager  
Waterfall Resort  
805-630-2533  
scott@waterfallresort.com



**APPENDIX XI****Statement by Greg Kain, Kain's Fishing Adventures**

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to

Section 5 - Mortality and Fishery Limits

Submitted comment

1/18/2024

IPHC Commission Members,

My name is Greg Kain, owner of Kain's Fishing Adventures operating out of Sitka, AK.

I am commenting about the upcoming IPHC annual allocation setting for Halibut in area 2C.

The last few years we have been struggling to keep our guests motivated in continuing there annual Halibut fishing trip. It has become difficult to appeal to new first time guests wanting to book a Halibut fishing trip because regulations have become to restrictive. Area 2C Guided Charters have to compete with other regions that have less restrictive Halibut regulations. When prospective guests have the choice between less restrictive regulations and one that offers a One Halibut of Sub 40 inch per day and day closures it becomes really difficult to be competitive and book trips. Now we are seeing a fast pace growth in the Rental Boat non guided fishing activity in area 2C to the point that they are dominating the overall catch numbers with 2 Halibut of any size per day and no day closures. The majority of traditional guided Charter fishing lodges, with exception of a couple long standing self guided lodges, have built their business models on fishing for Halibut "at one time" a two fish per day zero size restriction and 7 days a week fishing opportunity.

In 2023 we experienced the first Halibut day closures in area 2C for guided sport anglers. To say guests were not happy is a understatement. Especially when they find out they could rent a boat and catch two Halibut of any size per day and fish on days that guided anglers could not fish. To have to explain this restriction to guests, why a guided fisherman can not fish and non guided fisherman can fish is frustrating for the guests to understand. I heard from several guests that said they may choose to fish elsewhere due to better halibut regulations, or possibly just stop coming. Another option, they can opt to do the Self Guided trip option, which just eats up more quota. These restrictions make Guided Charter fishing a less attractive option for guests to fish for Halibut.

I encourage the commission to not take any additional cuts in allowed harvest in area 2C. No day closure restrictions for guided anglers. Consider a 1 fish Halibut bag limit for everyone Halibut fishing in area 2C.

Thank you,

Greg Kain



## APPENDIX XII

### Statement by Haley Janttie, Eagle Charters

Section of IPHC Fishery Regulations or regulatory proposal reference the comment will refer to      Section 5 - Mortality and Fishery Limits

Submitted comment



January 20, 2024

Dear International Pacific Halibut Commission,

On behalf of Eagle Charters lodge, I am writing to request your consideration of the following comments when determining the 2024 halibut regulations. Eagle Charters is a sport fishing lodge located in Elfin Cove in southeast, Alaska. We typically fish twenty four customers a day on our six boats, all of which are guided. Our charter boats primarily fish in Area 2C. Historically, halibut fishing is a large reason our customers choose our location and lodge. The halibut fishing in our area has been a market advantage over some of the larger ports. Over the years our customers continue to voice complaints regarding the size restrictions of retainable halibut. The day closure also had a significant impact on our customers attitude and trust in the industry. While our guides and management try to explain the closures in a professional manner, our customers still voice many complaints regarding the day closure in addition to the already existing restrictive size limits. Our customers also shared concerns that the regulating bodies are unpredictable. Many customers have explained that with such uncertainty each year they are not sure they will continue to book fishing trips at the risk of even worse regulations.

Our company chooses to purchase a large amount of GAF permits and make those available to our customers but this still does not make up for the restrictive size limit or day closure. From a marketing standpoint, it is very hard to sell trips with such restrictive size limits and an entire day when halibut cannot be targeted. Explaining this to new potential customers immediately decreases their interest. For long time existing customers explaining the new regulations each year creates a sense of concern and statements like "maybe it is time to try somewhere else" or "when are they going to completely shut down fishing."

Many of our customers are also concerned with the significantly different limits for the self-guided fishery, often making comments that they will have to consider a self-guided trip instead of choosing our charter lodge. This is a large concern to our business as well as the halibut industry. We have already seen a decrease in customer volume with many of those past customers stating the restrictions are the reason for not returning. Pushing more people into the self-guided fishing industry is concerning to the impact it has on the halibut populations with the current regulations. With less restrictive size limits and no day closures, we believe the customer retention for guided operations will increase which would positively impact the historical norms of the industry. As you know, guided operations are beneficial to the halibut fishery because the charter catch allocations are clearly established as specified in the Catch Sharing Plan resulting in a predictable removal.



Thank you for considering the impact of restrictive size limits and day closures on the charter fishing industry.

Sincerely,  
Haley Janttie  
Eagle Charters

**APPENDIX XIII****Statement by David Creighton, Shelter Cove Lodge**

Section of IPHC Fishery  
Regulations or regulatory  
proposal reference the comment  
will refer to

Section 5 - Mortality and Fishery Limits

Submitted comment

My Name is David Creighton. I am the second-generation operator of Shelter Cove Lodge located in Craig. I operate as a full service lodge with the only fine dining restaurant in Craig, full service bar and a fleet of 8 vessels two of which are 6 packs. This organization has provided me and 3 other families with year round employment and the ability to raise our children in SE Alaska. The intent of this letter is to express my fear that ever tightening regulations may render Shelter Cove Lodge unavailable for the 3rd generation.

Regulations for SE AK have been so dramatically reduced over the last decade that we have begun to lose our marketability. Our clients travel great distances to fish 3 days and losing 1 of those 3 days of halibut fishing has created additional marketing issues. The 2024 season sales have been significantly more difficult than recent past seasons. Every repeat client I lose costs marketing dollars to recruit new. Day closures are culprit number 1. The next most common concern is the halibut size. "I want to go catch a baby halibut".....said no one ever.

Many people come to Alaska to fulfil their dream of catching a nice halibut. To stay marketable, I have been forced to lease halibut to supplement catch opportunity with GAF tags. As you know, this is incredibly costly yet not as costly as not having clients. For our day closures, I have been forced to gift these tags to our clients in order to make their trips feel worth the increasing expense.

I have recently lost several long-time clients to self-guided lodges. They have learned how to fish for halibut from us and moved on to more productive setups. They can keep one large fish self-guided and have more fish to take home than all three they would be able to keep with us. This trend is going to not only hurt SE guide businesses but also increase fish caught in potentially under-managed sector of the sport fishery.

SE Alaska has experienced reductions to the bare minimum on king salmon, ling cod, and we have already gone below the bare minimum on halibut. Any further reductions on halibut will make a difficult situation even worse. At risk is a significant portion of Alaska's tourism economy that is a major supporter of the smaller outlying communities like Craig. Almost every business in Craig would be affected by the loss of even a single medium-sized charter operation.

I'm aware you've read many letters like this. The reason is because we love and rely on our businesses. Small adjustments in your decision-making processes can have huge impacts on our success or failure. We

will feel the impact of the Monday closures for years. Adding to this will undoubtedly make things more difficult.

Please proceed with caution.

Sincerely,

David Creighton

Shelter Cove Lodge

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