

I want to clarify that the point of proposal 164 was not to count the harvest by personal use fishermen. Chitna Dipnet Association and Mark Spencer seemed to think that this was the intent. Rather the intent was to collect data to make the job of the board of fish easier. Simply put all we know about the budding guide industry in personal use fisheries is that they seem to be increasing, however we have zero actual information to support this. We do not know if the catch rates of guided P/U fishermen are higher than unguided P/U fishermen. We do not know the numbers of guides or the number of fish fishermen under their direction harvest. We collect this information for guided anglers throughout the state with no issue.

Requiring PU guides to register with the department similar to sport fishermen would cause very almost no increased burden for these professionals, who currently have zero regulations governing this commercial use. As a sport fishing guide, registering myself and my business takes about five minutes, it is unbelievably easy, the exact same system could be used for PU guides with very little effort. I also imagine most PU guides are also sport fishing guides and do this anyway.

By having in season reporting requirements from professionals we could better manage these fisheries because harvest data is one of the most effective and useful pieces of data for managing all fisheries. By requiring professional guides to report their client's effort and catch guides would become partners in in season management, just as commercial fishermen and some subsistence fishermen are. Requiring guides to report in season would be a good stand in and provide high quality data to managers and researchers alike. It seems likely that data from professional guides would be more valuable than data from the general public as guides are on the river daily and would control the variables associated with the general public well. Lastly singling out guides for in season reporting would keep more burdensome regulations from the general public. As a sport fishing guide, I would absolutely love to participate in a program like this, and wish the state would partner with the industry to better manage our fisheries.

It is clear that the guide industry does not want any new regulations while I would prefer my proposal to be fully implemented I propose the following proposed language:

New Section to 5 AAC 77.015:

[PERSONAL USE FISHING GUIDES MUST REGISTER WITH THE DEPARTMENT.]

5 AAC 77.015 (a)

[(5) IF SPECIFIED ON THE PERMIT, EACH FISHERMAN SHALL KEEP ACCURATE DAILY RECORDS OF THE CATCH INVOLVED, SHOWING THE NUMBER OF FISH TAKEN BY SPECIES, LOCATION AND DATE OF THE CATCH, **IF A GUIDE OR TRANSPORTER WAS USED ON EACH DATE FISHED.** AND SUCH OTHER INFORMATION AS THE DEPARTMENT MAY REQUIRE FOR MANAGEMENT OR CONSERVATION PURPOSES;]

This would allow the department to collect appropriate data on the impact of guided PU fishing, and provide the board data to make the best decision for Alaskans, with virtually no additional burden to anyone.