

# Homer Charter Association

Board of Fisheries  
Office of the Governor  
PO Box 115526  
Juneau, Alaska 99811

November 12, 2023

## **Re: Homer Charter Association against Proposal 18 as written**

Dear Board of Fisheries members,

The Homer Charter Association (HCA) is a trade group based in Homer, Alaska, that represents guided recreational stakeholders in the Alaskan communities of the Lower Kenai Peninsula and Kodiak. The HCA is a pillar within the cooperative framework of fishers, fleets, and marine trade workers that make our region strong and our communities resilient.

The HCA is writing in against Proposal 18 as written.

The proposal from the Alaska Department of Fish and Game (ADF&G) would implement separate bag limits for pelagic and non-pelagic rockfish. HCA members believe that separating the bag limits will lead to a substantial increase in non-pelagic rockfish takings. Many of our clients like to fish for a limit, which often consists solely of black rockfish or other pelagic varieties. Having a separate non-pelagic bag limit will increase pressure on those fish since more anglers and guides will specifically target non-pelagic species more frequently to catch a limit of rockfish.

HCA does support revising rockfish limits to align with other fisheries in the North Gulf Coast -- bag limit of 4 per day, 8 in possession, of which only 1 per day, 2 in possession may be non-pelagic -- as proposed in Proposal 18 from ADF&G and put forth by the HCA in Proposal 20. Current ADF&G data for Lower Cook Inlet Saltwater Rockfish show that harvest has increased in the recreational and guided-recreational fisheries, and is likely to continue to do so with more stringent limits and regulations on other fish species. Data also has shown declining average age in retained rockfish catch. Current harvest rates may be unsustainable. Long-term fisheries access should be prioritized given current data.

We thank you for your consideration of our stance on the proposal, and if there are any additional questions, please contact the below email.

Thank you,

Avery Ault  
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