

Charter Halibut Management Proposal

The goals of a Charter Halibut Management System should aim to 1) keep harvest within allocation, 2) have one harvest rule in effect for an entire sportfishing season, known in advance, with no in-season closures, and 3) have a means of increasing allocation. To this end, this proposal will look at an alternative method for determining harvest measures that would take into account the unique variables of angler demand and average fish sizes and three harvest rule alternatives that have the potential of stabilizing charter businesses in Area 2C.

The difficulty in achieving precise harvest limits for recreational anglers is that recreational anglers fish in numbers of fish and not in pounds. Recreational harvest has always been calculated using a commercial fishing ruler, so the use of average fish sizes has been used in recreational harvest calculations. It is a known fact that fish vary greatly in size throughout regions and sub-regions and is a significant variable that needs to be accounted for. To complicate matters, the charter sector has been seen by regulators as a means to control a portion of the recreational fishery, that of guided anglers. In reality, the charter sector really has no control over guided angler effort (demand) other than to close its doors to business. For these reasons we need to look at a system that accepts a broader level of tolerance to accommodate for these variables while still being able to achieve the goals mentioned above.

What is proposed is a Charter Halibut Allocation Management Plan (CHAMP) that would be used in conjunction with harvest projections to determining guided angler harvest measures. In times of low abundance, guided anglers would be managed under the least restrictive harvest measure that would be projected to achieve a harvest of 90% of the regulatory allocation for the upcoming season. If at the end of the season the harvest is below this 90% threshold, the underage difference would be added to the next season's allocation. On the other hand, if at the end of the season the harvest is over 110% of that season's regulatory allocation, the overage difference would be deducted from the next season's allocation. It is assumed that this 20% range in projecting harvest is well within the capabilities of regulators at the moment and that a plus or minus 10% underage or overage would balance itself out over time.

To date, proposed harvest measures have fallen into two categories. The first is the traditional bag and possession limits (including a size restriction on a one fish limit) which attempts to allow the maximum number of anglers an opportunity to harvest fish. The second method is to allocate harvest to a certain limited number of anglers and thus allowing for potentially a less restrictive harvest measure for these select anglers. While either method would work under the proposed reserve banking methodology, the first method would eliminate the potential of an in-season closure and allow for increased marketability and stability for the charter sector.

For Area 2C, which is burdened with the most restrictive guided harvest measure at the moment, adoption of this CHAMP methodology could potentially lead to a smaller fish size since our default allocation would be 10% lower. However, if under the 37" rule, 2011 harvest projections come in 40 percent less than the GH (Guideline Harvest Level) as anticipated, then it is reasonable to expect a larger fish size than 37". Ultimately, it is hoped that a liberalizing of harvest restrictions in Area 2C will come with the projected increase in exploitable biomass or

with the ability to increase guided angler allocations through a compensated transfer mechanism that would allow the purchase of commercial quota shares to supplement regulatory allocations.

This proposal also requests consideration of three alternative harvest measures for Area 2C.

1. Daily bag limit of two fish under the commercial minimum size limit, currently 32" of which an angler may substitute one of these fish to be a fish of any size, but this fish of any size may only be done once annually for this angler.
2. Daily bag limit of one halibut with a maximum size of 45" or larger.
3. Daily bag limit of two fish with a maximum size of 37".

Alternative One

The opportunity to retain a halibut of any size in Area 2C will fulfill the trophy needs of guided anglers and return the marketability of fishing in Southeast Alaska that was eliminated under the 37" rule in 2011. In a simplistic look at what an annual limit of one fish of any size may result in, one can look at the last season that data was available under a one fish rule. In 2010 the harvest in Area 2C, under a one fish per day of any size rule, was 1.086 M pounds. The number of fish caught was 41,202. If you assume that on average an angler caught two fish in 2010, then there were approximately 20,601 anglers. Using these figures, having an angler limited to one fish per year would equate to a harvest of 543,000 pounds, a harvest well below the charter GHL of 788,000 pounds.

The U32 biomass is close to a billion pounds and growing. There is very little rationale to suggest all removals of halibut shouldn't be managed sustainably and this includes halibut under 32". A guided angler allocation of U32 halibut should be considered and analyzed to determine sustainability of this harvest along with other removals such as commercial bycatch and wastage. Since U32 fish are not currently part of the exploitable biomass, this harvest should not be deducted from the current charter allocation and/or charter allocations should be increased to accommodate an increase of U32 fish to the exploitable biomass. This was the case in 2011 when the IPHC decided to account for O26-U32 fish in commercial bycatch removals and increased TCEY (Total Constant Exploitable Yield) from 20% to 21.5% to accommodate for this adjustment for the commercial setline sector.

The major reason given in the past against annual limits was the problem with enforcement. The problem was originally attributed to the cost of separate federal record keeping requirements and legal issues regarding access to charter logbook information. Since that time, the State of Alaska has allowed enforcement access to log book information and the State has been tasked with data collection and reporting of guided recreational harvest of halibut through the charter log book program. While the log books have not been adopted by the IPHC as the method upon which to base allocation decisions, the charter log books have been used for enforcement reasons. There is little reason why the charter log books could not be used to enforce an annual limit on halibut.

This alternative works best for business models that target single day charters such as those that service the cruise ship industry. It does increase marketability in multi-day packages as it

does return the opportunity for a trophy fish, however other days will be limited to retaining fish under 32" which may present a problem for some local areas.

Alternative Two

Using the State's analysis with their Hybrid Methodology (method "C") to determine average size fish in conjunction with anticipated 2011 projected harvest results, it would be fair to assume Area 2C charter harvest could still remain within allocation if the maximum size fish was increased from 37" used in 2011. Various maximum size fish restrictions should be analyzed that would keep the Area 2C harvest still within allocation including a 45" fish.

This alternative would best fit the needs of the consumptive recreational angler who doesn't necessarily want to target trophy fish as they prefer smaller better eating ones. Business models that do not focus on trophy fish but have a need to increase the opportunity for their guests to take home more fish would benefit the most. This would offer some relief to operators that have used a trophy fish as part of their marketing plan in the past and want to transition to other markets, but this process is long and involved and may not be enough immediate relief for them.

Alternative Three

With projected harvest in 2011 to be very close to 50% of Area 2C's allocation, especially when you factor in the fact that State projections for guided angler removals have been as much as 30% higher than actual final estimates of removals, two fish with a maximum size of 37" may be possible alternative.

This alternative would favor consumptive recreational anglers as in alternative two, but will vary in acceptance depending on local community average size fish. For instance a community that finds it hard to find a fish under 37", might not see the advantage of this increased opportunity. This, like alternative two, will not favor those businesses that traditionally targeted large trophy fish.

This alternative will have the potential of decreasing costs to some operators as the amount of fish able to be retained on a single trip would be doubled from 2011. This may equate to less trips for some operators.

In summary, the proposed change in methodology used in determining guided angler harvest measures and the alternative harvest measures discussed in this proposal would assist in stabilizing the charter sector in Area 2C. I would like to submit this proposal for consideration by the North Pacific Fishery Management Council and if adopted, request that the National Marine Fisheries Service utilize their expedited rulemaking process to analyze these alternatives

Submitted by:

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