



Charter Halibut Management Committee

REPORT

10:30 AM to 3:30 PM | December 3, 2019 | Anchorage, AK

The Charter Halibut Management Committee met in Anchorage, AK on December 3, 2019 from 10:30 AM to 3:30 PM to review analysis of potential charter halibut management measures and recommend 2020 measures for implementation in IPHC Areas 2C and 3A. The Committee also received a presentation on the initial review draft of an analysis on unguided halibut rental boat registration (Council Agenda Item C-8) and subsequently provided comments and recommendations for the Council to consider.

Committee Members in attendance:

Andy Mezirow, Chairman
Steve Zernia
Matt Kopec
Daniel Donich

Stan Malcolm
Kent Huff
Seth Bone
Denise May

Mike Flores
Richard Yamada
Forrest Braden
Sam Cunningham (staff)

Others in attendance (public affiliation):

Rachel Baker (ADF&G)
Sarah Webster (ADF&G)
Rick Green (ADF&G)
Jim Hasbrouck (ADF&G)
Bob Powers (ADF&G)
Baine Etherton (ADF&G)
Stephen Keith (IPHC)
Kate Haapala (NPFMC)
Doug Duncan (NMFS)
Alicia Miller (NMFS)
Kurt Iverson (NMFS)

Bill Tweit (NPFMC)
Tom Gemmell
Mel Erickson
Kenji Yamada
Tim Comer
Murtie Comer
Ernie Kirby
Clay Duda
Billy Hayden
Daniel Hayden
Ben Martin

Lynn Keogh
Leslie Pemberton
McKinley Kellogg
Nadra Angerman
Jeff Wedekind
Mark Warner
Ken Federico
Aaron Mahoney
Wally Martin
Theresa Peterson
Duncan Fields

2020 Charter Halibut Management Measures

Sarah Webster (ADF&G) presented results from the analysis of the charter halibut management measure options for 2020 in Areas 2C and 3A that were defined at the Committee's October 2019 meeting.

Area 2C representatives support a reverse slot limit with day closures and annual bag limits added as measures *as needed* to maintain at least a 40" maximum size on the low end of the slot. The Committee felt that 40" represents fairness to the needs of all business models in view of historical participation in the halibut fishery. Based on the analysis, the Committee **recommends** the following management measures:

In Area 2C – A progression of management measures in the following order:

- 1. A reverse slot with an upper limit fixed at O80, and a lower limit raised until the allocation is reached, but no lower than U40;**

2. **If the allocation is insufficient to maintain at least a U40 on the lower limit, add Wednesday closures beginning on September 9th and work consecutively toward the beginning of the season until a lower limit of U40 is reached;**
3. **If a lower limit of U40 can't be reached after closing all Wednesdays, add a 4-fish annual limit in addition to closing all Wednesdays, and use any unused allocation to increase the lower limit above U40 until the allocation is reached;**
4. **If a lower limit of U40 can't be reached by closing all Wednesdays and adding a 4-fish annual limit, reduce the annual limit to 3 fish in addition to closing all Wednesdays, and use any unused allocation to increase the lower limit above U40 until the allocation is reached.**

Committee members felt that progressing in an additive manner from the U40"/O80" reverse slot to day closures to annual limits – in that order – is the most equitable way to distribute reductions across business models. The Committee notes that Area 2C has been under its allocation in four of six years since the implementation of the Catch Sharing Plan (CSP) while using a reverse slot limit. The total net underage during that 2014-2019 period is 574,000 lbs. (cumulative 30%)¹. The Committee points out that modeled catch may be biased high when projecting harvest on reverse slots with a lower maximum size limit less than U44". Because the reverse slot remains the underlying basis of the harvest measures being considered, the Committee believes it could be appropriate to consider a less restrictive size limit even if it falls slightly above the charter allocation.

For **Area 3A**, the analysis revealed that none of the options defined in October would result in meeting the reference level of halibut removals that was specified at the IPHC interim meeting in November. All analyzed options for management measures are projected to result in more removals than the range of TCEY levels that are probable to be selected for the area at the IPHC annual meeting in February 2020. As a result of this unprecedented situation, the Committee has made both a recommendation and a request. The **recommendation** is:

In Area 3A – Limit charter harvest to the status quo TCEY (within 2%). Maintain status quo management measures, except:

1. **Closure of Tuesdays throughout the year;**
2. **Include second fish of 26" or less.**

Committee members representing Area 3A stated that reductions beyond the management measures recommended above would have severe adverse impacts on the charter sector as well as local tourism and associated economies in the area. Given the gravity of the decision on the form that further reductions might take, the Committee feels it necessary to see an analysis of the options that could actually meet the reference TCEY. In other words, the Committee desires to have a voice in whether further reductions are achieved by day closures, length restrictions, or a combination – and what that combination might be. The Committee **requests** that ADF&G staff analyze a wider range of management measure options and that they be allowed to make a recommendation based on that analysis in the form of a publicly noticed teleconference taking place prior to the Council's February 2020 meeting and the IPHC's Annual Meeting. If the Committee is not able to review options that could achieve the reference TCEY, the members are concerned that they would be ceding the decision on the *mechanism* to reduce removals to the IPHC.

¹ Area 2C overage/underage by year: 2014 +9%; 2015 -4%; 2016 -7%; 2017 +3%; 2018 -12%; 2019 -19%.

Other points of discussion:

The Committee noted the different types of impacts that result from more restrictive size limits, bag limits, and day closures. The key distinction that was highlighted was between size/bag limits and day closures. Day closures – especially as the number of closed days per week increases – directly affect operators’ ability to hire and retain captains and crew. Changes to size and bag limits affect operators’ ability to market trips to clients (recognizing that reduced demand could indirectly affect hiring and retention).

The Committee is concerned about the magnitude of year-on-year fluctuation in TCEY and is interested in dialogue with IPHC about options to limit annual variation. Uncertainty about the following year’s management measures are of particular concern to the charter sector because the nature of its business is to book clients far in advance, often for the following year. The inability to confidently assure clients of bag limits or open days in the course of a multi-day booking is an impediment to marketing and client retention. Possible methods to limit variation might include phasing in restrictions over several years or relying on rolling averages of multiple years to determine allowable removals.

The Area 3A representatives requested that the Council consider including all user groups (charter, unguided, commercial, and trawl bycatch) in the CSP when it conducts the upcoming CSP review. They also request a review of allocations apportioned to each sector. This request reflect the notion that the charter and commercial sectors have experienced catch reductions as a result of lower TCEY while unguided and trawl users have not. These minutes do not imply that the Area 2C representatives agree or disagree with this request, as they did not comment and there was not an attempt to make a consensus recommendation.

Public Comment on 2020 Management Measures:

The Committee received public comment from Mel Erickson, Ben Martin, Jeff Wedekind, Clay Duda, and Ernie Kirby.

Review of C-8 Unguided Halibut Rental Boat Registration

The Committee received an overview of the initial review analysis from Kurt Iverson (NMFS). Questions asked by the Committee addressed the lack of information available on the demographic makeup of the rental boat customer base and the inability to draw conclusions about whether and to what extent the expansion of unguided rental boat catch could impact other sectors.

The Committee supported moving forward with Alternative 2 (require registration) without objection. Members noted that a registration requirement will enable the gathering of information that is necessary to manage unguided rental boat use from an informed perspective. However, it was acknowledged that implementing a registration rule and then collecting the data is a process that will not bear fruit for several years, and will not collect information on unguided catch and effort. The Committee anticipates that a registration action will signal Council consideration of limiting rental boats in the future, and thus there may be a rush for current charter operators and other vessel owners to register their vessels as rental boats. The Committee discussed the two Elements under Alternative 2 (Elem. 1: 2C only or 2C & 3A; Elem. 2: register annually, every 3 years, or every 5 years) but did not vote or express preferences at this time. The Committee noted that it is difficult to know whether to include Area 3A without knowing the extent of unguided rental activity on an area basis. It was noted that requiring registration less frequently could reduce administrative costs.

The Committee did not support moving forward with Alternative 3 (align unguided size/bag limits with charter limits) at the present time. The primary reason given was that it is premature to complicate management of recreational halibut when the extent of the impact that unguided rental boat catch is having and where it is occurring is not yet known. The Committee did share the perception that the types of vessels being offered as rentals are becoming larger and better able to access deep-water species like halibut. Moreover, the Committee felt that a period of uncertainty about the direction of the halibut stock and the size of the charter allocation under the CSP is not a good time to change bag limits. The Committee felt that subjecting a new user group (unguided rental boat anglers) to a new set of regulations would further fracture the recreational angling sector to address an activity that may or may not be a problem, or might only be a problem in certain areas. Moreover, regulating the rental boat sector may incentivize persons or businesses to develop new strategies to avoid charter angling restrictions, such as group ownership of vessels. Finally, the Committee discussed the rental boat issue as a byproduct of the different angling restrictions between the charter sector and unguided sector. Some committee members indicated that particularly during periods of stock decline, the entire unguided sector should bear some of the responsibility for halibut conservation.