

# D1 AREA 2C AND 3A HALIBUT CATCH SHARING PLAN ALLOCATION REVIEW

Presenter: Sarah Marrinan

Scientific and Statistical Committee, February 2022

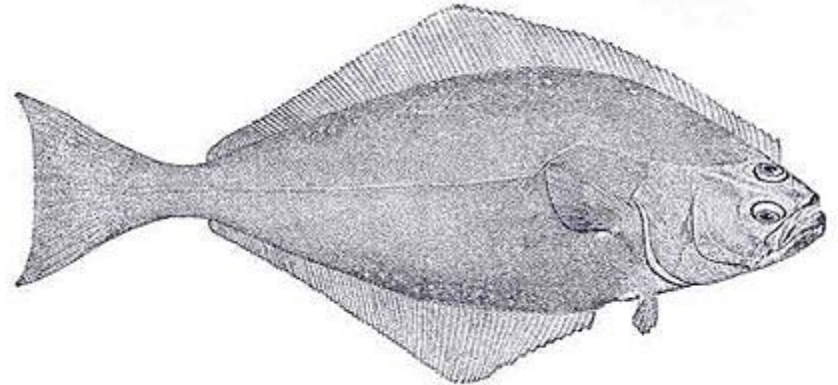
Additional preparers:

Mike Fey (AKFIN) & Kurt Iverson (NMFS)



# OUTLINE OF STAFF PRESENTATION

- Introduction
  - Purpose and scope
  - Program and goals
- Halibut assessment and management
- Background on allocation and program
- Sector profiles
  - Commercial
  - Charter
  - Guided Angler Fish
- Evaluation of program objectives and changing factors
- Next steps



# PURPOSE

Address NOAA Allocation Policy Directive (01-119)

- Ensure fishery allocations are periodically reviewed and considered

Three-step process: **Step 1)** trigger is met, **Step 2)** allocation review, **Step 3)** (*if warranted*) evaluation of fisheries allocation and analysis of possible changes

- Currently at Step 2: Review FMP (or program) objectives. Are the objectives being met? Have other relevant factors changed that would impact the allocation?
- **At this stage, in-depth analyses are not required. Should provide sufficient information to allow comparison of program objectives and whether they are being met by the current allocation or if other relevant factors have changed enough to warrant an in-depth formal analysis of the allocation.**



# SCOPE

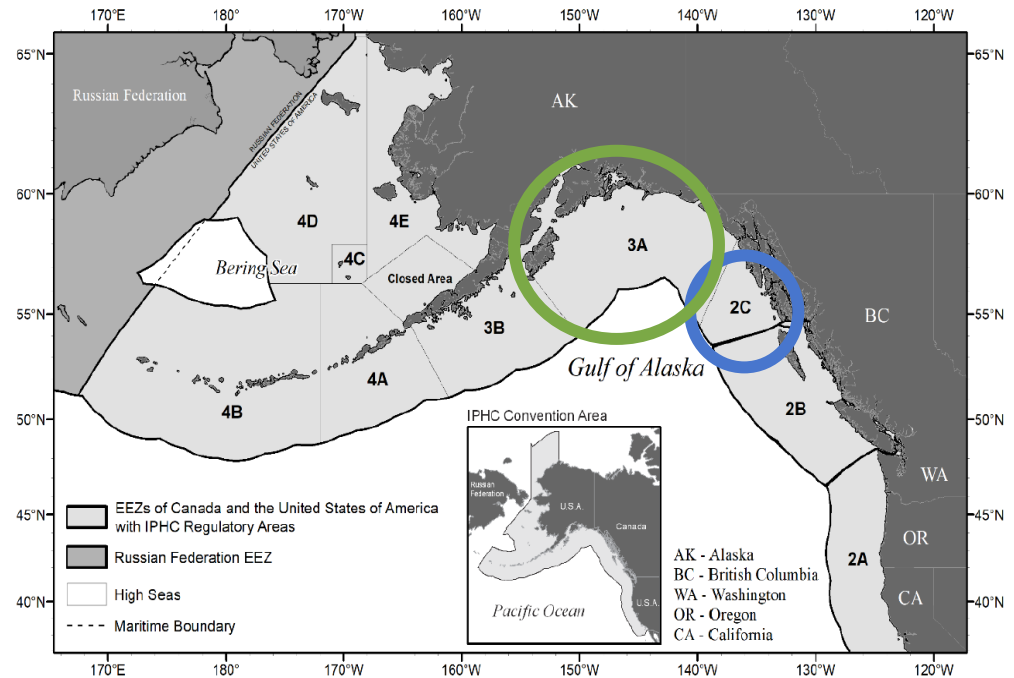


- Policy Directive
- CSP objectives
- Other examples in the North Pacific, and
- Additional feedback and public comment through the Council process



# THE CATCH SHARING PLAN FOR 2C AND 3A

- Defines allocations between commercial and charter halibut fishing in Area 2C and 3A (including discard mortality)
- Specifies a public process for determining charter halibut annual management measures
- Authorizes limited annual leases of commercial IFQ for use in the charter fishery as guided angler fish (GAF)



# GOALS OF THE CSP

1. Create a management regime that provides separate accountability for each sector;

2. Management tools and season length should be established during the year prior to the year in which they would take effect, and that the tools selected, and season length should not change in season;

3. Evaluate its success in achieving the sport charter sector allocation and specific needs for predictability, advance notice, and season length each year, and adjust its management tools as needed;

4. Adjust management measures as needed to ensure that the sport charter sector is held at or below its allocation, recognizing that there may be annual overages or underages.

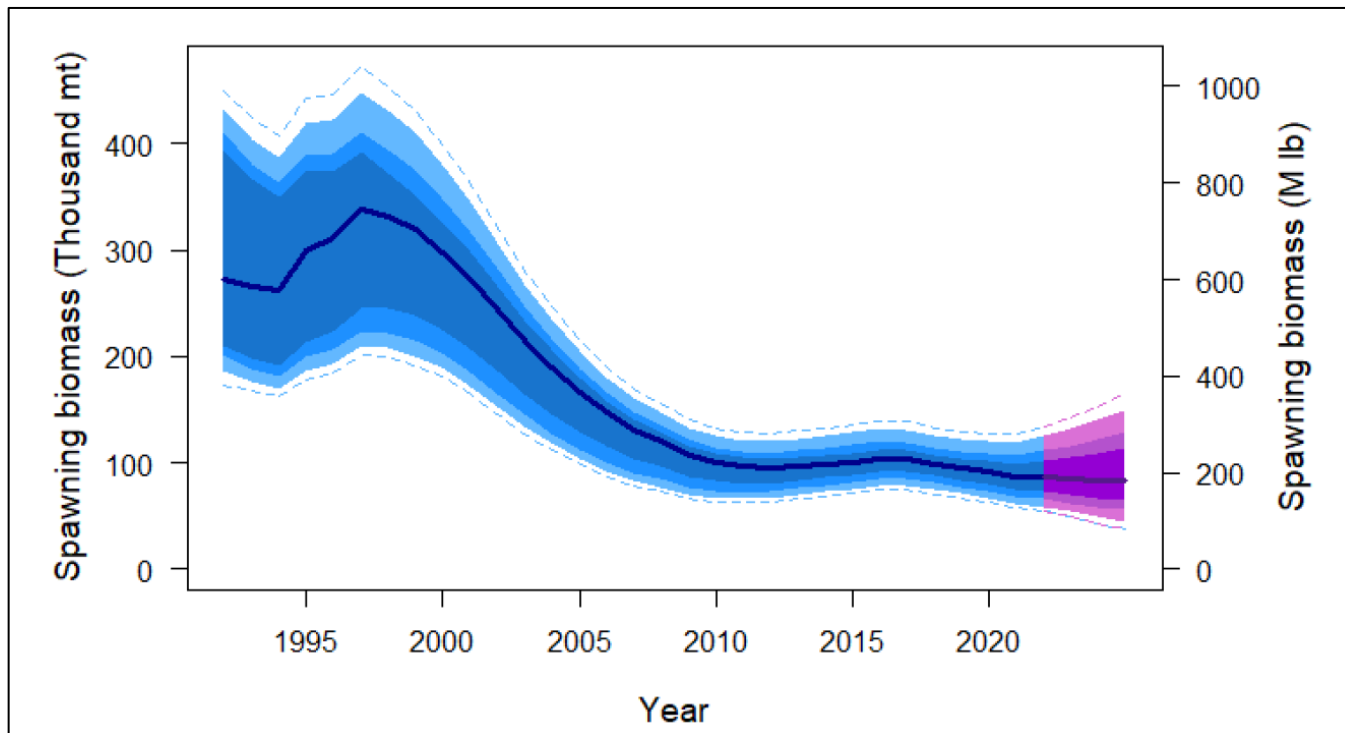




# HALIBUT ASSESSMENT AND MANAGEMENT

# HALIBUT STOCK AND ASSESSMENT

**Stock three-year projections using the integrated results from the stock assessment ensemble and the Total Constant Exploitation Yield (TCEY) projected at the reference level (41.2 Mlb TCEY)**



Reproduced from [IPHC-2022-AM098-10](#)

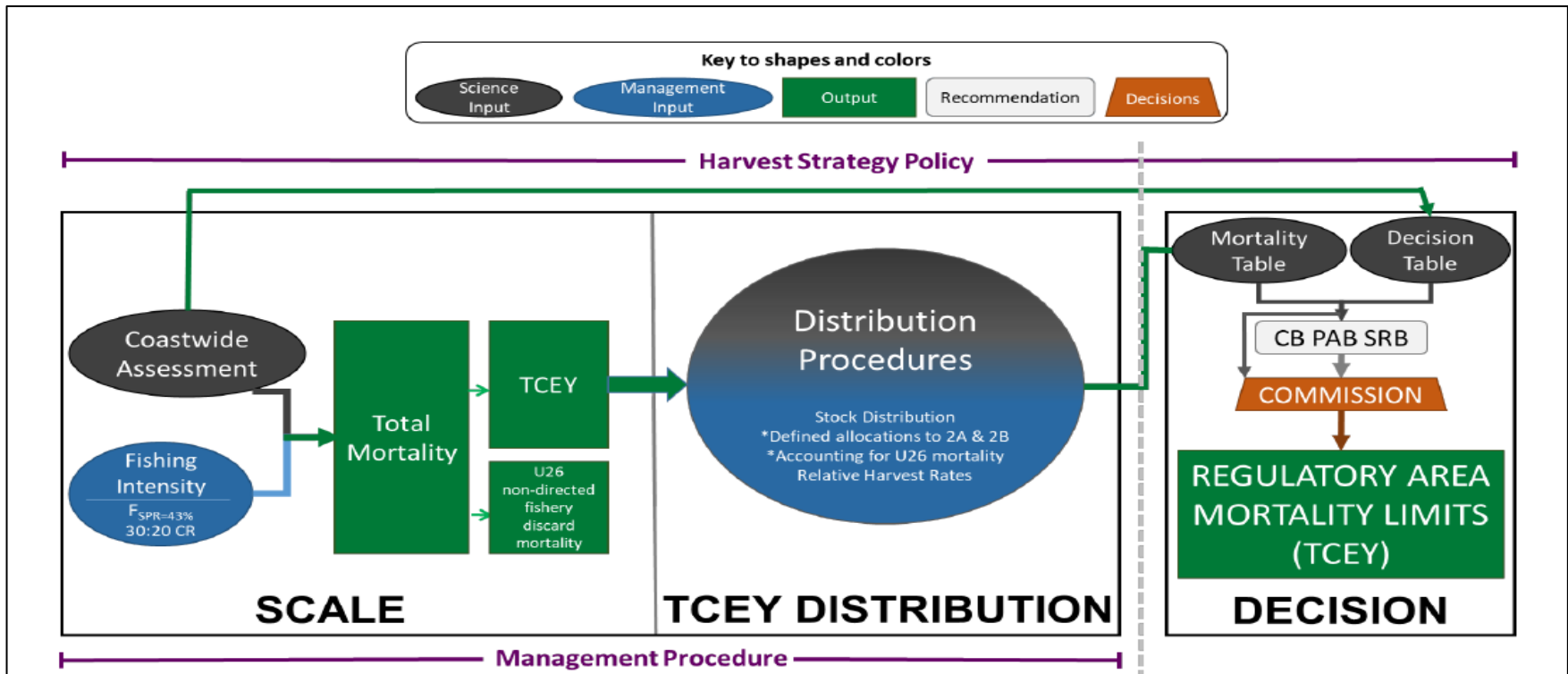
Figure 6, page 18





# HALIBUT MANAGEMENT

## Diagram of the IPHC interim harvest strategy policy



Reproduced from [IPHC-2022-AM098-12](#)

Items with an asterisk are three-year interim agreements through 2022. The decision component is the Commission decision-making procedure, which considers inputs from many sources.

Figure 8, page 21



# HALIBUT MANAGEMENT

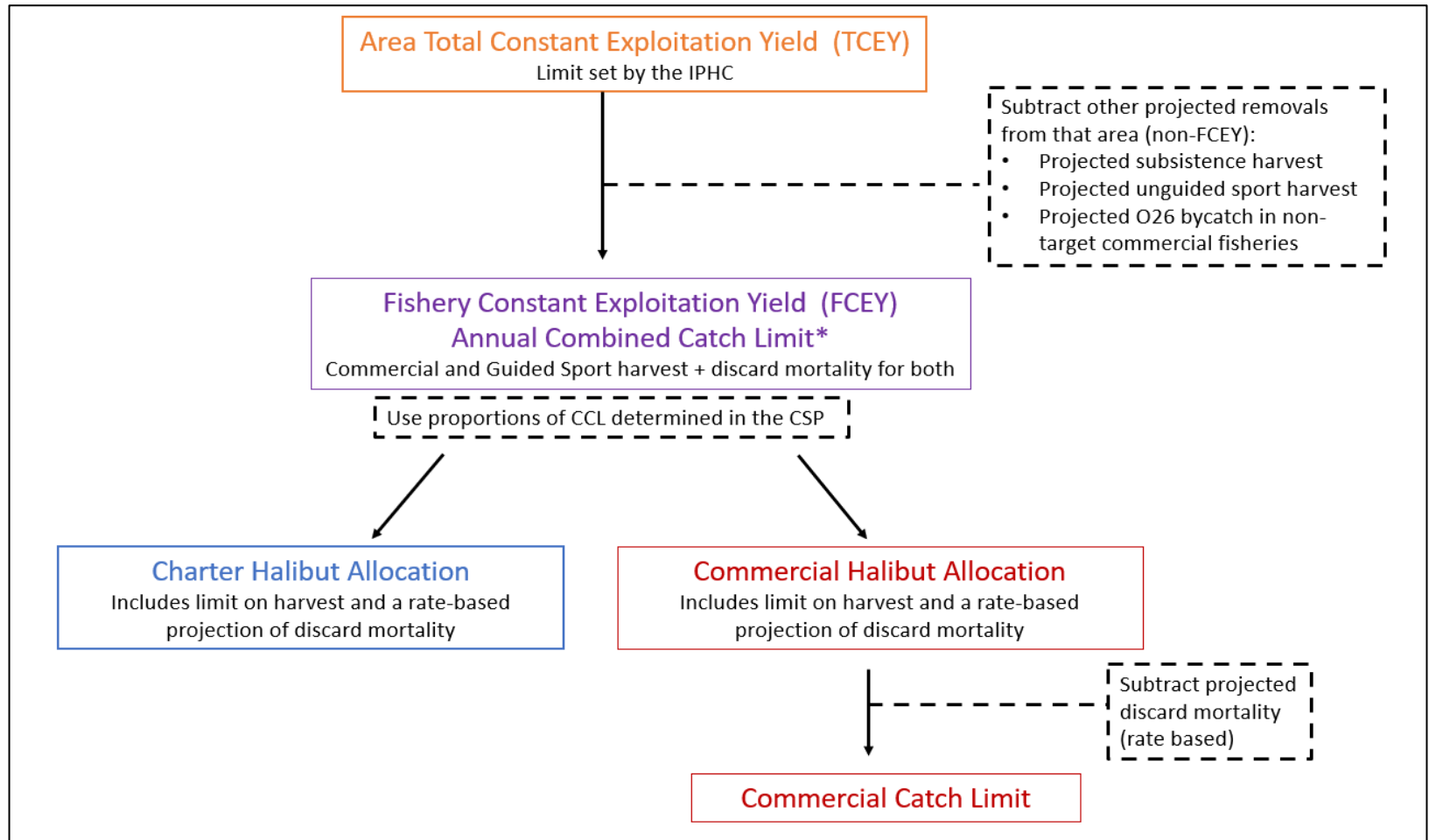


Figure 9, page 23





Photo credit: D. Donich



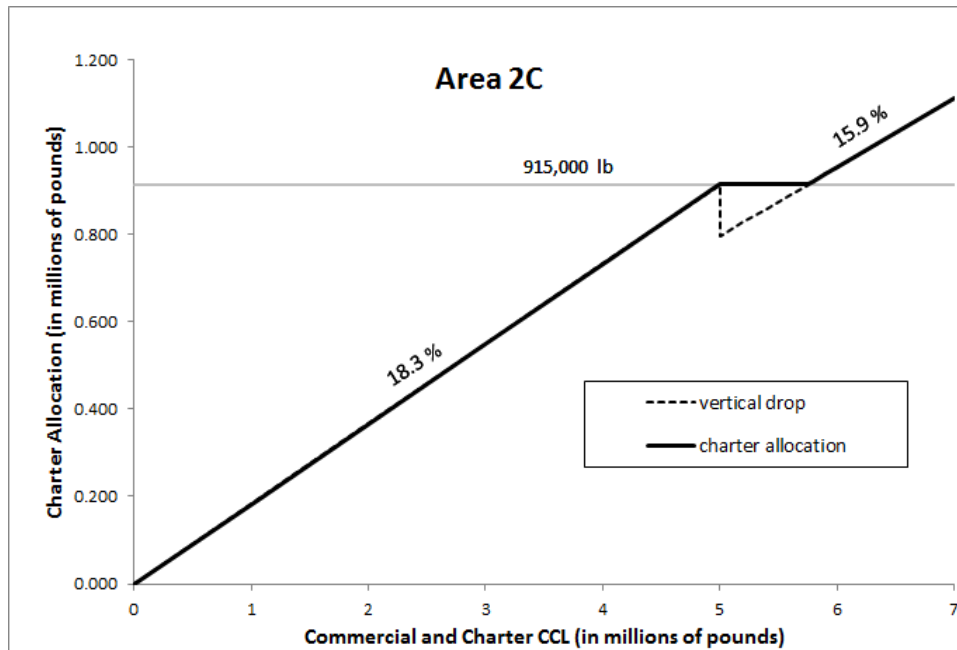
Photo credit: J. Curry

# BACKGROUND ON THE ALLOCATIONS AND MANAGEMENT ESTABLISHED IN THE CSP

# AREA 2C ALLOCATIONS

Area 2C annual CCL for halibut in net lb.	Charter halibut fishery CSP allocation (% of annual CCL or net lb.)	Commercial halibut fishery CSP allocation (% of annual CCL or net lb.)
0 to 4,999,999	18.30%	81.70%
5,000,000 to 5,755,000	915,000 lb.	Area 2C CCL minus 915,000 lb.
5,755,001 and up	15.90%	84.10%

Table 7 & Figure 15,  
page 34



## ALLOCATION HISTORY FOR AREA 2C

<b>2C</b>	<b>CCL</b>	<b>% Charter</b>	<b>% Commercial</b>	<b>Level of the allocation</b>
2014	4,159,720	18.3%	81.7%	<b>step 1</b>
2015	4,650,000	18.3%	81.7%	<b>step 1</b>
2016	4,950,000	18.3%	81.7%	<b>step 1</b>
2017	5,250,000	17.4%	82.6%	<b>step 2</b>
2018*	4,450,000	18.2%	81.8%	<b>step 1</b>
2019	4,490,000	18.3%	81.7%	<b>step 1</b>
2020	4,260,000	18.3%	81.7%	<b>step 1</b>
2021	4,410,000	18.4%	81.6%	<b>step 1</b>

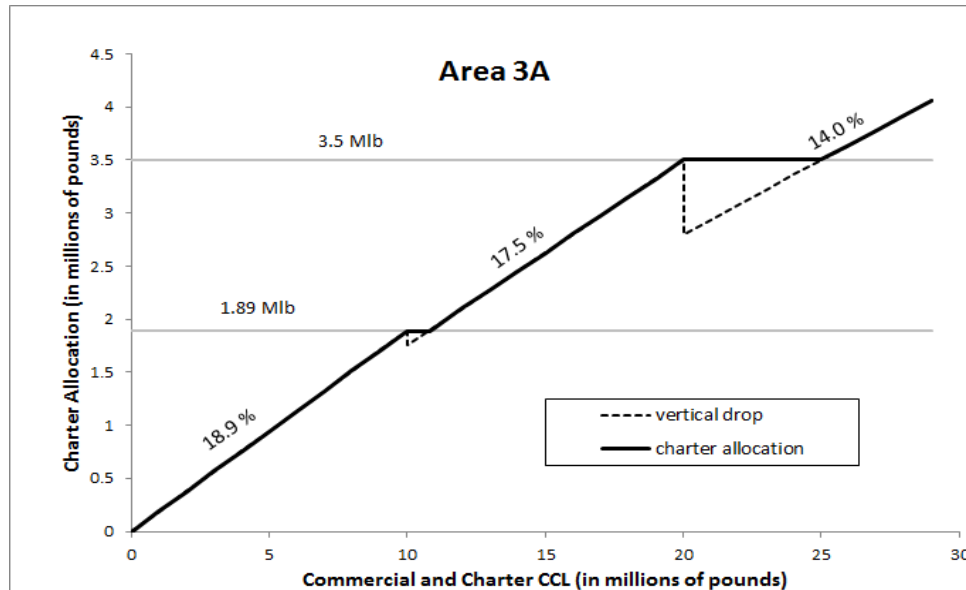
\* CCL adopted by NMFS in 2018.



# AREA 3A ALLOCATIONS

Area 3A annual CCL for halibut in net lb.	Charter halibut fishery CSP allocation (% of annual CCL or net lb.)	Commercial halibut fishery CSP allocation (% of annual CCL or net lb.)
0 to 9,999,999	18.90%	81.10%
10,000,000 to 10,800,000	1,890,000 lb.	Area 3A CCL minus 1,890,000 lb.
10,800,001 to 20,000,000	17.50%	82.50%
20,000,001 to 25,000,000	3,500,000 lb.	Area 3A CCL minus 3,500,000 lb.
25,000,001 and up	14.00%	86.00%

Table 9 & Figure 16,  
page 35



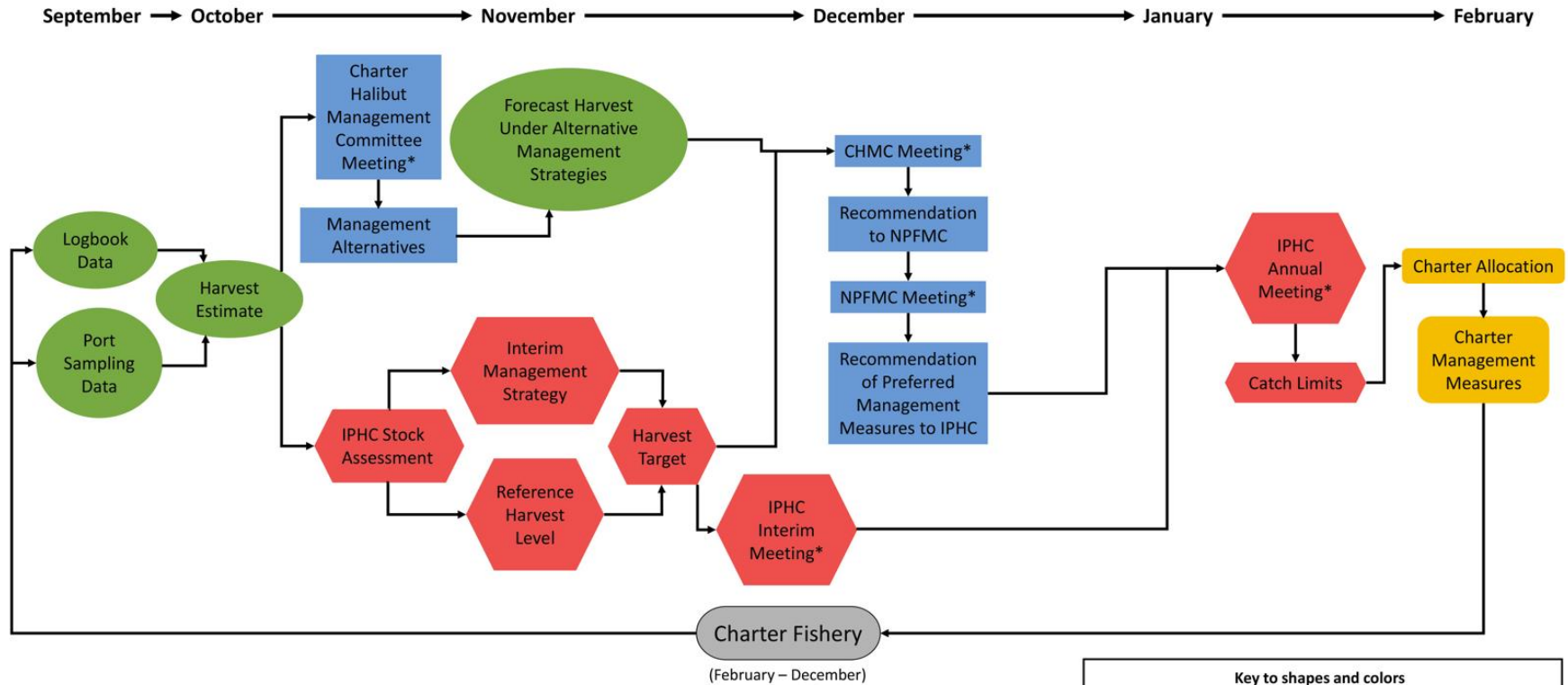
## ALLOCATION HISTORY FOR AREA 3A

<b>3A</b>	<b>CCL</b>	<b>% Charter</b>	<b>% Commercial</b>	<b>Level of the allocation</b>
2014	9,429,730	18.9%	81.1%	<b>step 1</b>
2015	10,100,000	18.7%	81.3%	<b>step 2</b>
2016	9,600,000	18.9%	81.1%	<b>step 1</b>
2017	10,000,000	18.9%	81.1%	<b>step 2</b>
2018*	9,460,000	18.9%	81.1%	<b>step 1</b>
2019	10,260,000	18.4%	81.6%	<b>step 2</b>
2020	9,050,000	18.9%	81.1%	<b>step 1</b>
2021	11,140,000	17.5%	82.5%	<b>step 3</b>

\* CCL adopted by NMFS in 2018.



# CHARTER HALIBUT MANAGEMENT PROCESS



Courtesy Alaska Department of Fish and Game - Sarah Webster



Section 5.2, page 42; Figure not included in paper





# GUIDED ANGLER FISH (GAF)

- Established as part of the CSP
- Allows limited annual leasing of halibut IFQ to be converted into GAF according to Table 14
- A GAF can be used to retain a halibut that might otherwise not be able to be harvested due to charter management measures;
- Up to 2 fish of any size
- For example, in Area 2C GAF could be used to retain a second fish of any size. For Area 3C, GAF could be used to retain a halibut on an otherwise closed day.
- Transfer limits for both GAF permit holders and QS holders

Year	Conversion Factor	
	IFQ lb / GAF	
	Area 2C	Area 3A
2014	26.4	12.8
2015	67.3	38.4
2016	65.1	36.1
2017	74	42
2018	71	44
2019	66	42
2020	61	40
2021	72	57
2022	74	27



# RECREATIONAL QUOTA ENTITY (RQE)



Photo credit: R. Yamada

- RQE may purchase halibut QS from a commercial halibut QS holders and hold these QS on behalf of charter anglers in that regulatory Area
- Additional pounds used to augment annual charter mortality limits and ultimately relax management measures
- Includes a number of transfer restrictions

- Currently seeking a workable funding mechanism (preferred alternative is a charter halibut stamp)
- Requires both Congressional action and Federal rulemaking
- Any reallocation analysis would need to consider the potential cumulative impacts with GAF and RQE opportunity

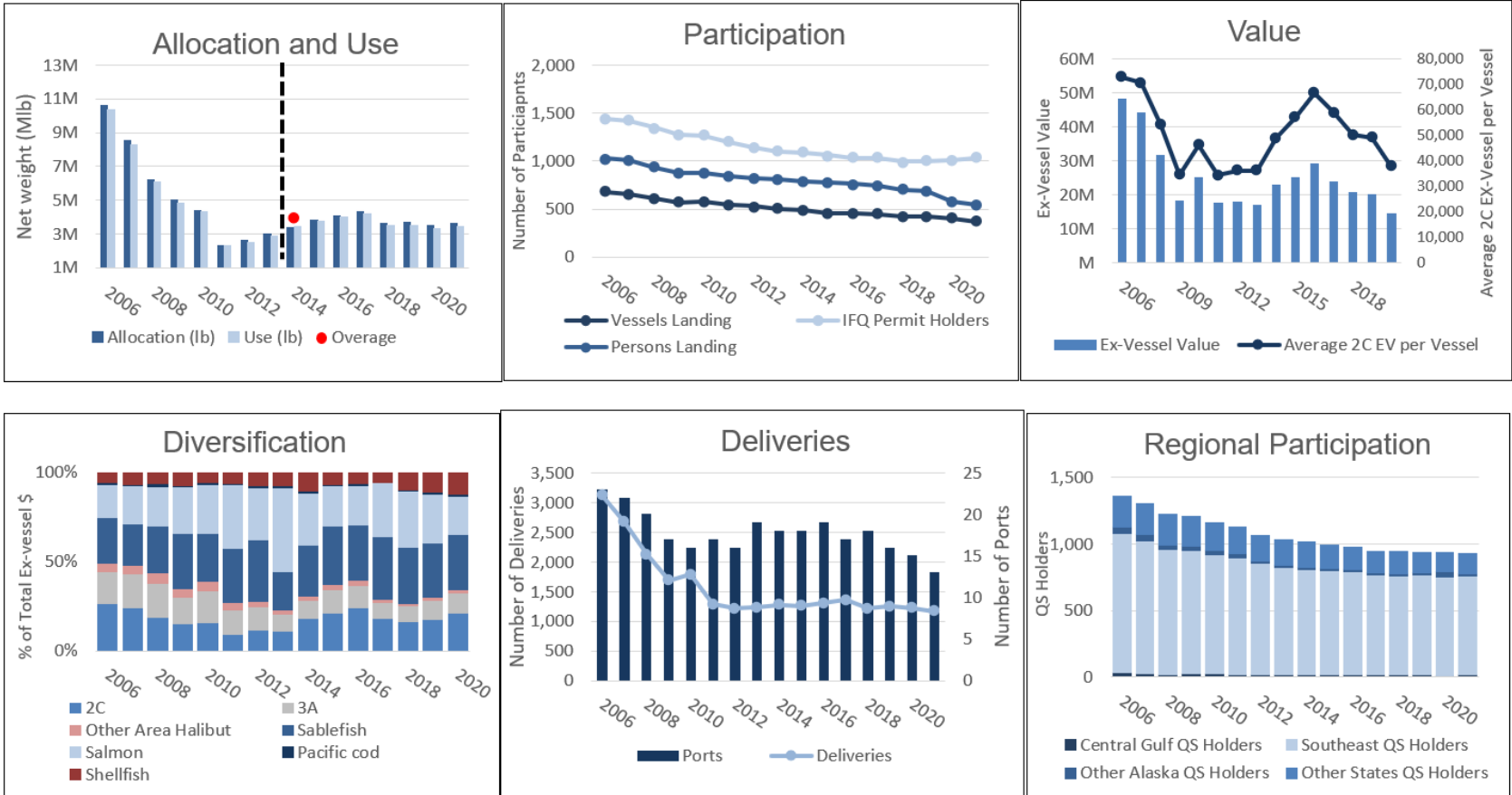




# SECTOR PROFILES

Photo credit: R. Yamada

# AREA 2C COMMERCIAL HALIBUT METRICS

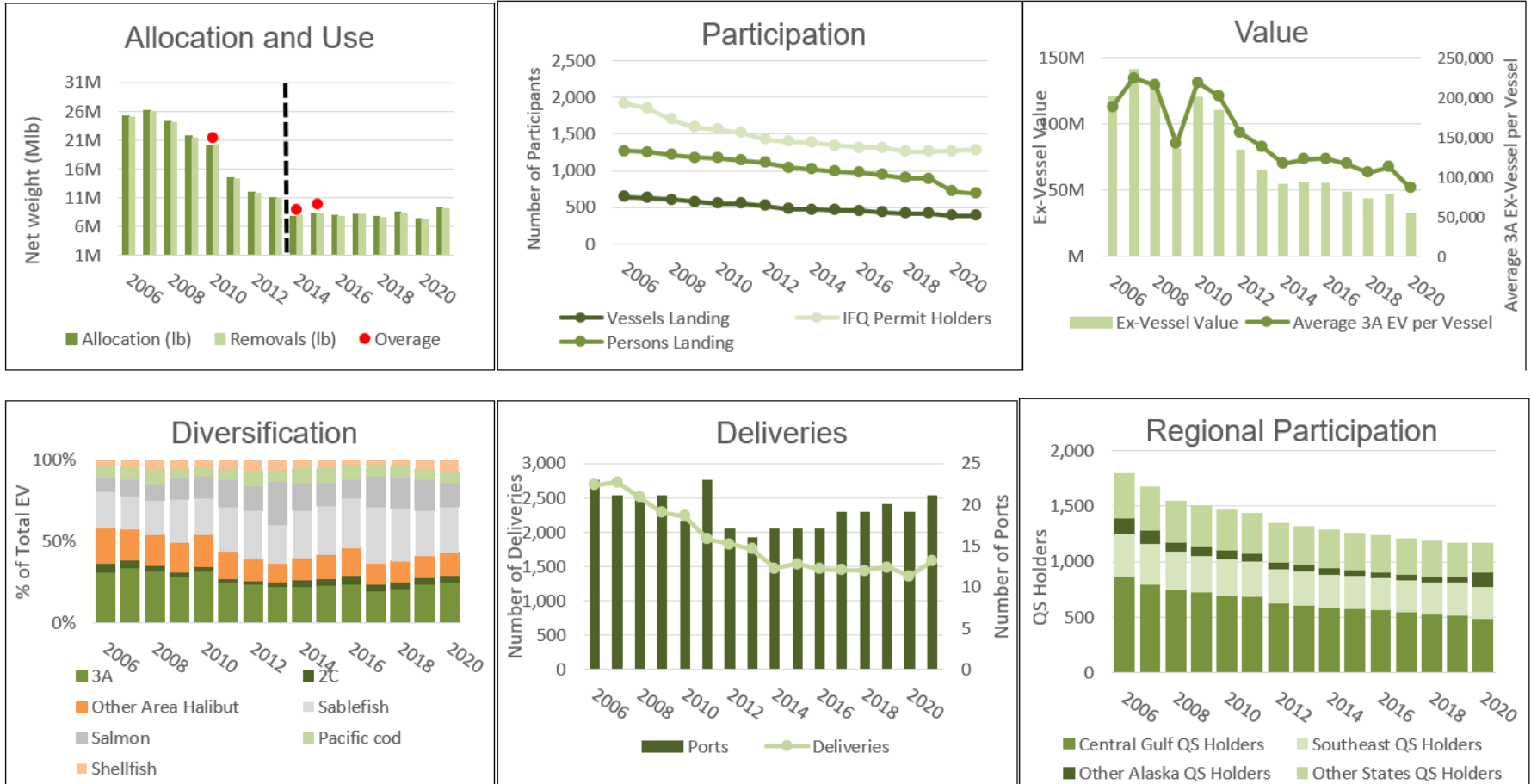


Allocation and use post-CSP (2014) include discard mortality, but pre-CSP discard mortality not included. Document error: shows a zero ex vessel value in 2021, but 2021 values not meant to be included for value figures. Additional notes and sources in the document.

Figure 19, page 54



# AREA 3A COMMERCIAL HALIBUT METRICS

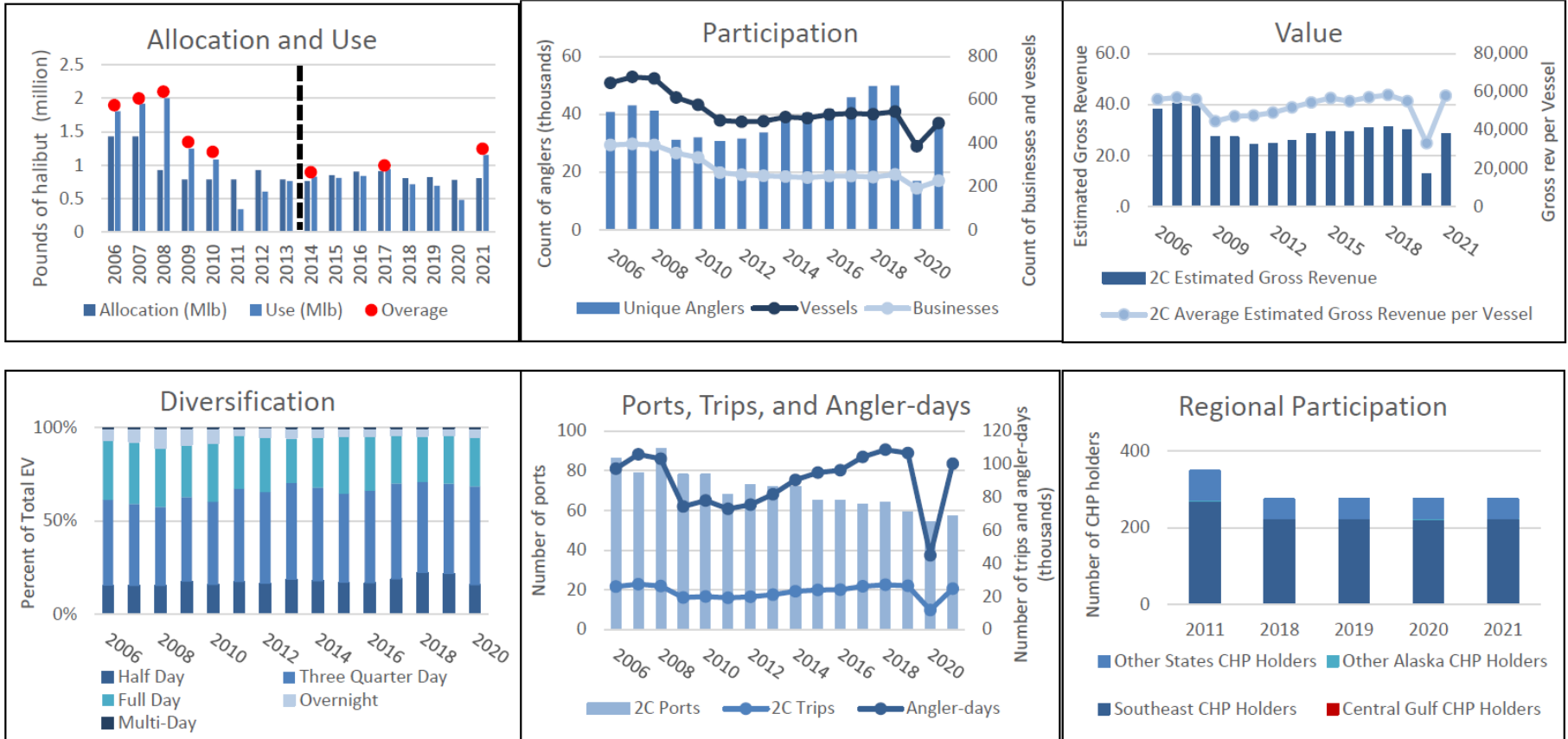


Allocation and use post-CSP (2014) include discard mortality, but pre-CSP discard mortality not included. Document error: shows a zero ex vessel value in 2021, but 2021 values not meant to be included for value figures. Additional notes and sources in the document.

Figure 19, page 55



# AREA 2C CHARTER HALIBUT METRICS



Allocation and use post-CSPA (2014) include discard mortality, but pre-CSPA discard mortality not included. Additional notes and sources in the document.

Figure 20, page 59



# AREA 2C CHARTER MANAGEMENT MEASURES

Year	Mgmt Type	Area 2C Charter Management Measures
2006	GHL	Two fish any size, State EO prohibiting crew harvest 5/26-12/31.
2007	GHL	Two fish (one $\leq 32$ "; effective 6/1), no crew retention 5/1-12/31 (State EO and Federal Rule).
2008	GHL	Two fish (one $\leq 32$ "), except one-fish bag limit Jun 1-10 (halted by injunction).
2009	GHL	One fish any size, no harvest by skipper & crew, line limit (effective 6/5).
2010	GHL	One fish any size, no harvest by skipper & crew, line limit.
2011	GHL	One fish $\leq 37$ ", no harvest by skipper and crew, line limit.
2012	GHL	One fish $\leq 45$ " or $\geq 68$ ", no harvest by skipper and crew, line limit.
2013	GHL	One fish $\leq 45$ " or $\geq 68$ ", no harvest by skipper and crew, line limit.
2014	CSP	One fish $\leq 44$ " or $\geq 76$ ", CSP provisions.
2015	CSP	One fish $\leq 42$ " or $\geq 80$ ", CSP provisions.
2016	CSP	One fish $\leq 43$ " or $\geq 80$ ", CSP provisions.
2017	CSP	One fish $\leq 44$ " or $\geq 80$ ", CSP provisions.
2018	CSP	One fish $\leq 38$ " or $\geq 80$ ", CSP provisions.
2019	CSP	One fish $\leq 38$ " or $\geq 80$ ", CSP provisions.
2020	CSP	One fish $\leq 40$ " or $\geq 80$ "; changed to one fish $\leq 45$ " or $\geq 80$ " on 6/15/2020, CSP provisions.
2021	CSP	One fish $\leq 50$ " or $\geq 72$ ", CSP provisions.

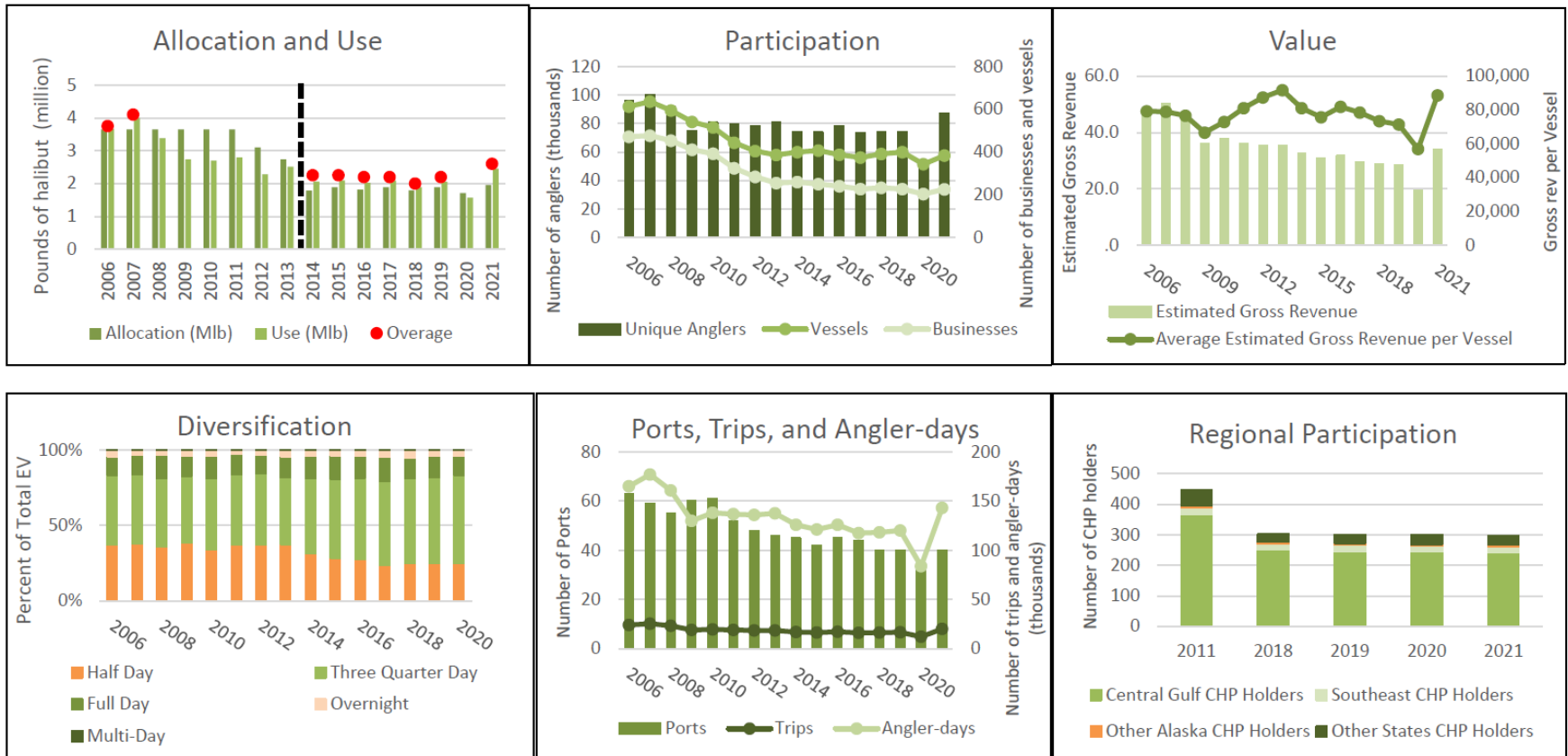


CSP provisions means no harvest by skipper or crew. In addition, the State of Alaska regulations for Southeast Alaska still state that the maximum number of fishing lines that may be fished from a vessel engaged in charter activities is equal to the number of paying clients on board the vessel but cannot exceed six lines.

Table 15, page 61;  
Also Figure 28, page 96



# AREA 3A CHARTER HALIBUT METRICS



Allocation and use post-CSP (2014) include discard mortality, but pre-CSP discard mortality not included. Additional notes and sources in the document.





# AREA 3A CHARTER MANAGEMENT MEASURES

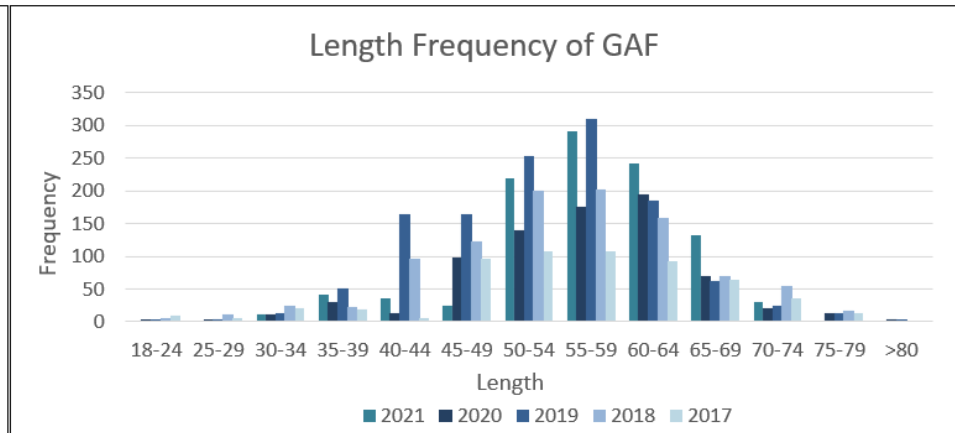
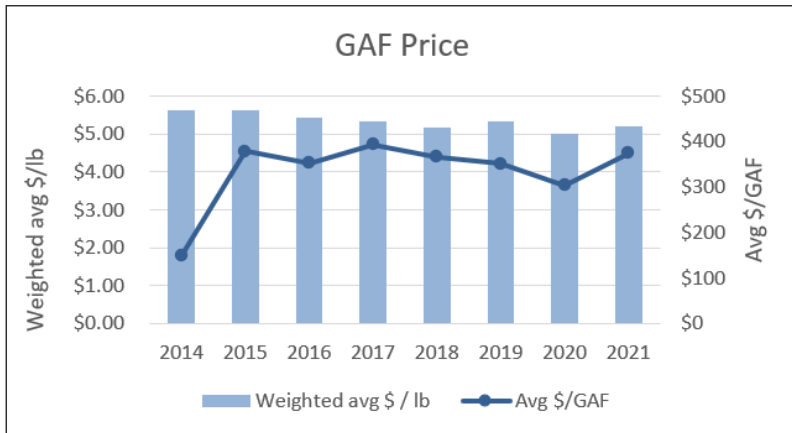
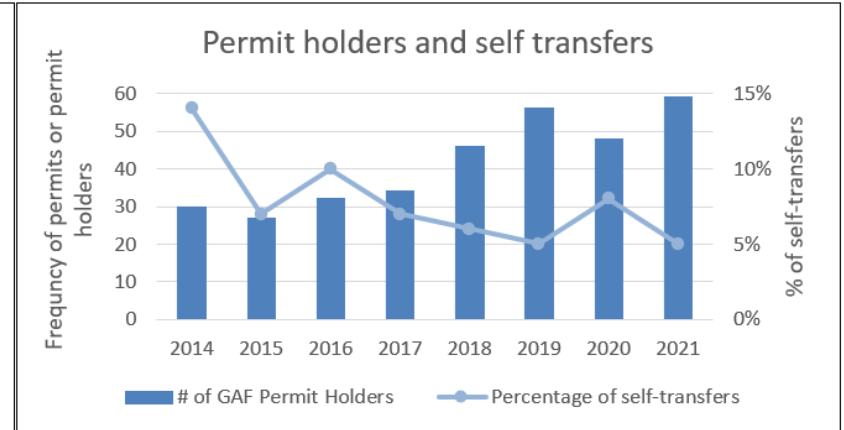
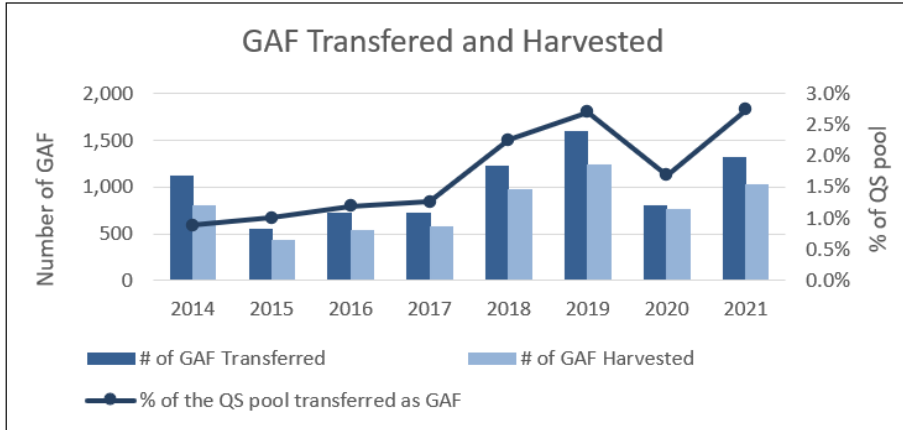
Year	Mgmt Type	Area 3A Charter Management Measures
2006	GHL	Two fish any size, no limit on crew retention.
2007	GHL	Two fish any size, state EO prohibiting crew harvest 5/1-12/31.
2008	GHL	Two fish any size, state EO prohibiting crew harvest 5/24-9/1.
2009	GHL	Two fish any size, state EO prohibiting crew harvest 5/23-9/1.
2010	GHL	Two fish any size, no limit on crew retention.
2011	GHL	Two fish any size, no limit on crew retention.
2012	GHL	Two fish any size, no limit on crew retention.
2013	GHL	Two fish any size, no limit on crew retention.
2014	CSP	Two fish (one ≤ 29"), CSP provisions.
2015	CSP	Two fish (one ≤ 29"), 5-fish annual limit, Thursday closure (6/15-8/31), CSP provisions.
2016	CSP	Two fish (one ≤ 28"), 4-fish annual limit, Wednesday closure, CSP provisions.
2017	CSP	Two fish (one ≤ 28"), 4-fish annual limit, Wednesday closure, 3 Tuesdays closed, CSP provisions.
2018	CSP	Two fish (one ≤ 28"), 4-fish annual limit, Wednesday closure, 6 Tuesdays closed, CSP provisions.
2019	CSP	Two fish (one ≤ 28"), 4-fish annual limit, Wednesday closure, 5 Tuesdays closed, CSP provisions.
2020	CSP	Two fish (one ≤ 26"), 4-fish annual limit, Wednesday and Tuesday closure, CSP provisions. On 6/15/20 begin fishing with two fish (one ≤ 32"), no annual limit, 7 days fishing per week, CSP provisions.
2021	CSP	Two fish (one ≤ 32"), Wednesday closure, CSP provisions.

CSP provisions means no harvest by skipper or crew. Throughout the CSP there has also been a limit of 1 trip per CHP per day and 1 trip per vessel per day in Area 3A.

Table 16, page 62;  
Also Table 29, page 97



# AREA 2C GAF

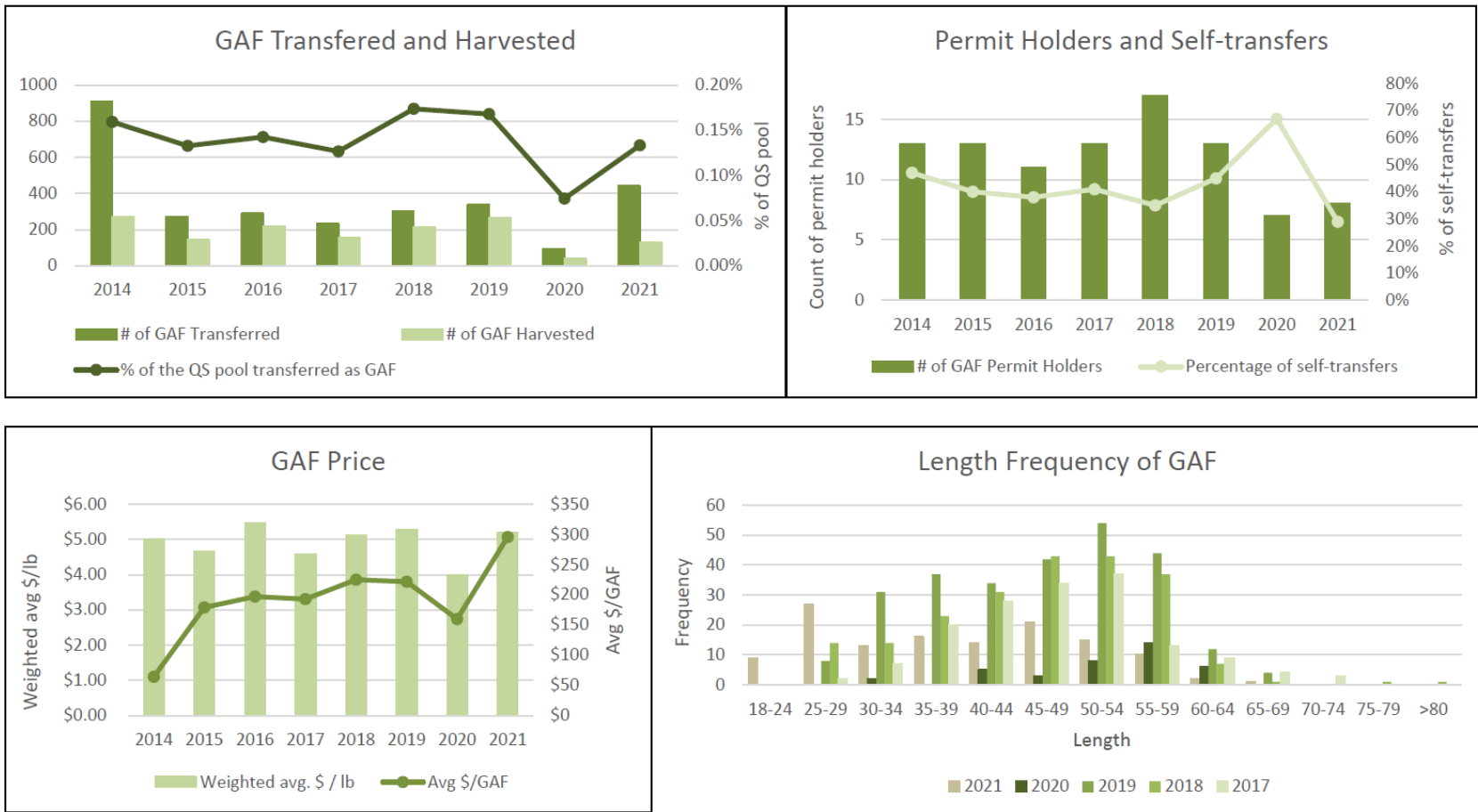


Document error: Missing Area 2C permit holders and self-transfers for 2021  
 Additional notes and sources in the document.

Figure 21, page 71



# AREA 3A GAF



Additional notes and sources in the document.

Figure 21, page 72





# CSP OBJECTIVES

## CSP OBJECTIVES – I. SEPARATE ACCOUNTABILITY

- The CSP incorporates the charter sector into the CCL
  - Incorporates projected discard mortality for each sector separately under its own allocation
- ✓ Appears this objective has been addressed



## CSP OBJECTIVES – 2. UNCHANGING SEASON LENGTH

- Unchanging season length/ no in-season management changes for the charter fishery was identified as priority
- The CSP management cycle ensures measures are established prior to the charter season, *although technically not in the year before the season*
- The season lengths and management measures have not changed in-season (with the expectation of emergency action due to the pandemic)
- ✓ Appears to generally address the objective of no in-season changes in the management system (expect for the first year of the pandemic), set prior to the season but not in the preceding year.



## CSP OBJECTIVES – 3. SPECIFIC CHARTER NEEDS FOR PREDICTABILITY, ADVANCED NOTICE, AND SEASON LENGTH

- The CSP management has established a more predictable process for changes.
  - Prior to establishment of the CSP, Area 2C had management changes in-season from multiple regulatory agencies.
  - This system resulted in a delayed feedback loop of action relative to overages and was inefficient (substantial underages and overages).
- However, management measures now change every year, and those measures are not known until the IPHC meeting.
  - Under the GHL, Area 3A consistently operated under 2 fish of any size limit.
  - Area 2C measures had changed occasionally.
  - Restrictions could be sustainably different from the previous year depending on the TCEY set at the IPHC and projected removals.



Dashboard figures for the charter sector,  
Tables 15 & 16, & Section 7



## CSP OBJECTIVES – 3. SPECIFIC CHARTER NEEDS FOR PREDICTABILITY, ADVANCED NOTICE, AND SEASON LENGTH

- Stakeholders identify different levels of instability currently present.
  - Uncertainty for the upcoming year (e.g., day-of-the-week closures)
  - Uncertainty in long-term operational planning (should they be trying to market to a different type of angler?)
- Compressed process does not afford much opportunity for evaluating management options
- More subjective whether this objective has been addressed. Impacts of the CSP may be perceived by charter representatives as less stable.



Dashboard figures for the charter sector,  
Tables 15 & 16, & Section 7





## CSP OBJECTIVES – 4. ENSURE THE CHARTER SECTOR IS HELD AT OR BELOW ITS ALLOCATION, RECOGNIZING THERE MAY BE ANNUAL UNDERAGES OR OVERAGES

- Area 2C has remained at or near its allocation in most years, with the exception of 2021 (prelim estimate: 42.5% over)
  - On average (excluding pandemic years), 4.5% under
  - Prior to the CSP, Area 2C had a pattern of exceeding the GHF, sometimes by a substantial amount.
  - Predictions may become more difficult in Area 2C with the adoption of measures that differ from the preceding year and depend more on angler behavior
- Area 3A has had overages in every year except 2020
  - On average (excluding pandemic years), 10.5% over
  - Predicting removals in Area 3A has proved to be more difficult due to uncertainty in angler response



Dashboard figures for the charter sector, Tables 15 & 16, discussion in Section 6.2 & Section 7



## CSP OBJECTIVES – 4. ENSURE THE CHARTER SECTOR IS HELD AT OR BELOW ITS ALLOCATION, RECOGNIZING THERE MAY BE ANNUAL UNDERAGES OR OVERAGES

- Tables 18 & 19 demonstrate predictions relative to estimated removals.
  - Measures often insight a behavioral component, thus the biggest challenge for accuracy is uncertainty in angler behavior.
- Not expected to harm the long-term sustainability of the stock, but could have short-term impacts on availability for other sectors
- While there is no direct consequence for an overage/ underage, the CSP provides a response mechanism as any increases in projected removals are considered in the following year
- Overage have occurred under the CSP, and predictions have not been consistently more accurate overtime. It is subjective whether the overages/ underages that have occurred are “too much” as the Council did not define a specific level.



Dashboard figures for the charter sector, Tables 15 & 16, discussion in Section 6.2 & Section 7



# ADDITIONAL CHANGING FACTORS

Many factors have changed since the CSP was established:

- Aspects of IPHC management and assessment process
- Recent Council actions (RQE, CHP renewal, several discussion papers)
- Additional literature (e.g., Hutniczak 2021, Kroetz et al. 2016, Lew & Larson 2017, Lew & Lee 2019, Lew & Seung 2018)
- Increased experience and knowledge about how the program has operated
- External/ global changes



# NEXT STEPS

## **SSC/ AP/ Council: Accept review or recommend changes**

AP/ Council: determine whether to further consider:

- Allocation decisions
- Broader programmatic changes within the Council's authority

Each would trigger an additional analytical step.

Could be initiated as discussion papers or analyses depending on how clear alternatives are.



Photo credit: R. Yamada



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## Thank you to reviewers and persons consulted:

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## QUESTIONS?



Sarah Marrinan

[sarah.marrinan@noaa.gov](mailto:sarah.marrinan@noaa.gov)

