

D1 Charter Halibut Permit Use and Angler Effort Data Requests

Discussion paper



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2026

CHARTER HALIBUT MANAGEMENT COMMITTEE

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History and purpose of discussion paper

➤ Tasked in December 2025

(proposal originated from the Charter Halibut Management Committee in Oct 2025 + CQE addition from AP)

- Intended to provide useful context for annual management measures process, in considering the performance of the Charter Halibut Limited Access Program, and in considering the possible impact of the Recreational Quota Entity
- Not intended to be a comprehensive review of the Charter Halibut Limited Access Program
- Does not direct a specific action, although next steps may be considered after review



Outline of 7 data requests

1. Annual renewal and retirement of Charter Halibut Permits (CHPs)
2. Ownership transfer and lease transfer of CHPs
3. Transferable CHP use and non-transferable CHP use (trip counts, angler days)
4. Use of Community Quota Entity (CQE) CHP issued to non-active CQE entities
5. A description of the extent to which businesses which are at the CHP holding cap (5) are also using additional CHPs through lease transfer

Outline of 7 data requests

6. Holding constant the most recent Fishery Constant Exploitation Yield (FCEY), average weight, and harvest per unit effort (HPUE), project the maximum effort level allowing for the following harvest measures:

Area 2C

- U45O80 reverse slot with no additional harvest measures
- One fish of any size with no additional harvest measures
- Two fish of any size with no additional harvest measures

Area 3A

- One fish of any size and a second fish of 28" or less, closed Wednesdays, and a one-trip daily limit
- One fish of any size and a second fish of 32" or less, with no additional harvest measures
- Two fish of any size with no additional harvest measures



Outline of 7 data requests

7. Holding constant the most recent FCEY, average weight, HPUE, and angler effort, project the maximum harvest measures available assuming full RQE pools:
 - For 2C use a reverse slot table
 - For 3A, in order, increase size of the second fish up to 32", open up days of the week



Background context - CHPs

Since 2011, all charter halibut vessel operators required to have a valid charter halibut permit onboard

- Issued as transferable or with a lower threshold of report history, as non-transferable
- Endorsed for a certain number of anglers to be onboard (between 4-38; Table 2)
- Includes special (non-transferable) permits for Community Quota Entities and U.S. Military Morale, Welfare, and Recreation (MWR)
- Includes a holdings cap of 5 CHPs

Table 1 Number of CHPs, MWRs and CQE charter permits by regulatory area, 2026

Permit type	2C	3A
CHPs	529	426
<i>Non-transferable CHPs</i>	155	85
<i>Transferable CHPs</i>	374	341
CQE Community CHPs	48	56
MWR CHPs	1	6
Area Total	578	488



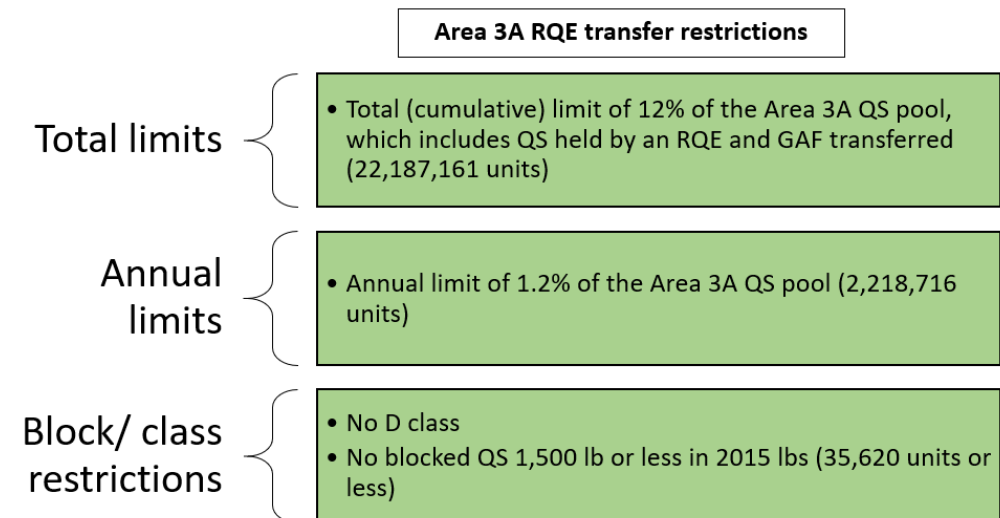
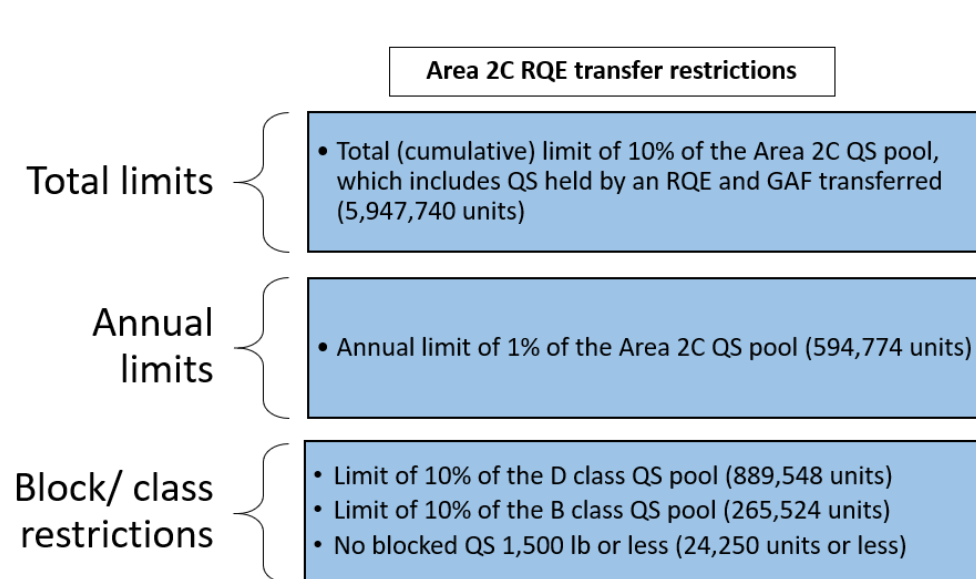
Background context – leasing CHPs

- The Council has had an extensive history around considering restrictions on the leasing of CHPs; however, CHP leasing is still an authorized feature of the program.
- An operator must have an original, valid permit onboard a halibut charter.
- Temporary transfers do not go through NMFS
- CHP leasing can include complex business agreements or be as simple as one person handing someone their CHP for the day.



Background context – Recreational Quota Entity

- The RQE is a non-profit entity authorized to purchase and hold commercial halibut quota share (QS) on behalf of charter halibut anglers in regulatory Areas 2C and 3A.
- QS held may augment the apportioned pounds of halibut for the charter catch limit for that Area in that year, which can be used to relax the annual charter management measures.
- The charter halibut stamp is the funding mechanism for this entity, which began in 2026.
- The RQE received its first transfer of Area 2C halibut QS in 2026. This included 25,974 units of C Class Area 2C QS, equivalent to ~1,300 lb in 2026.



Request #1: Renewal and retirement of CHPs

Adapted from Table 3 Count of Charter Halibut Permits not registered, 2020-2026

2C = 529 CHPs (excludes CQE and MWR)						
Year	# non-transferable	% non-transferable	# transferable	% transferable	# 2C Total	% 2C total
2020	35	23%	9	2%	44	8%
2021	35	23%	11	3%	46	9%
2022	31	20%	3	1%	34	6%
2023	28	18%	3	1%	31	6%
2024	28	18%	4	1%	32	6%
2025	33	21%	4	1%	37	7%
2026	34	22%	14	4%	48	9%
Average	32	21%	7	2%	39	7%
Median	33	21%	4	1%	37	7%

- Since 2020, CHPs must be registered annually to be valid for use.
- Across both areas, 34 CHPs have never been registered.

3A = 426 CHPs (excludes CQE and MWR)						
Year	# non-transferable	% non-transferable	# transferable	% transferable	# 2C Total	% 2C total
2020	26	31%	18	5%	44	10%
2021	31	36%	26	8%	57	13%
2022	22	26%	18	5%	40	9%
2023	22	26%	11	3%	33	8%
2024	22	26%	13	4%	35	8%
2025	23	27%	7	2%	30	7%
2026	22	26%	5	1%	27	6%
Average	24	28%	14	4%	38	9%
Median	22	26%	13	4%	35	8%



Request #1: Renewal and retirement of CHPs

- Non-transferable CHPs are invalidated when a permit holder dies or business entity dissolves, or if new shareholders or partners enter business.
- Since 2012, 25 non-transferable CHPs have been retired.
- This is not an automatic process but may occur when NMFS is notified.

Table 4 Change in number of CHPs, CQEs, and MWR charter permits between 2012 and 2026

Regulatory Area	Permit type	Number of permits (2012)	Number of permits (2026)	Net change in permits (2012-26)
2C	CHPs	534	529	-5
	<i>Non-transferable CHPs</i>	160	155	-5
	<i>Transferable CHPs</i>	374	374	0
	CQE Community CHPs	48	48	0
	MWR CHPs	1	1	0
	Area 2C total	583	578	-5
3A	CHPs	439	426	-13
	<i>Non-transferable CHPs</i>	98	85	-13
	<i>Transferable CHPs</i>	341	341	0
	CQE Community CHPs	63	56	-7
	MWR CHPs	6	6	0
	Area 3A total	508	488	-20
Both areas	Grand total	1,091	1,066	-25



Request #2: Ownership transfer and lease transfer of CHPs

Table 5 Change in number of CHPs, CQEs, and MWR charter permits HOLDERS between 2012 and 2026

Regulatory Area	Permit type	Number of permit holders (2012)	Number of permit holders (2026)	Net change in permit holders (2012-26)
2C	CHPs	252	262	10
	<i>Non-transferable CHPs</i>	100	96	-4
	<i>Transferable CHPs</i>	198	190	-8
	CQE Community CHPs	12	12	0
	MWR CHPs	1	1	0
	Area 2C total	265	275	10
3A	CHPs	322	280	-42
	<i>Non-transferable CHPs</i>	77	67	-10
	<i>Transferable CHPs</i>	270	218	-52
	CQE Community CHPs	10	8	-2
	MWR CHPs	3	3	0
	Area 3A total	334	290	-44
Both areas	Grand total	599	565	-34

- Transferable CHPs may change ownership over time through a transfer application submitted to NMFS Restricted Access Management
- Table 5 (left) demonstrates changes in CHP holders and Table 6 demonstrates CHP transfer activity from 2011-2026
- Slight net expansion in Area 2C
- Net consolidation in Area 3A
- Spike in transfer activity in 2021 and 2022



Request #2: Ownership transfer and lease transfer of CHPs

Adapted from Table 7 Financial compensation received from use of a CHP, 2020-2026

- Leasing a CHP is not a transfer that is done through NMFS, there is currently no monitoring or reporting ability for this type of transfer.
- However, the CHP registration application includes a question about whether financial compensation was received for allowing another person to use the CHP (i.e., leasing)
- This provides self-reported lease rates since 2020

ALL Area 2C CHPs

Year	Financial Compensation received?		
	No	Yes	% Yes
2020	363	122	25.2%
2021	405	80	16.5%
2022	412	89	17.8%
2023	423	79	15.7%
2024	411	90	18.0%
2025	433	60	12.2%
2026	423	59	12.2%
Average	410	83	16.8%
Median	412	80	16.5%

Area 2C Non-transferable CHPs

Year	Financial Compensation received?		
	No	Yes	% Yes
2020	95	25	20.8%
2021	97	23	19.2%
2022	97	27	21.8%
2023	105	22	17.3%
2024	95	32	25.2%
2025	104	18	14.8%
2026	103	20	16.3%
Average	99	24	19.3%
Median	97	23	19.2%



Request #2: Ownership transfer and lease transfer of CHPs

Adapted from Table 7 Financial compensation received from use of a CHP, 2020-2026

ALL Area 3A CHPs

Year	Financial Compensation received?		
	No	Yes	% Yes
2020	289	96	24.9%
2021	279	90	24.4%
2022	304	93	23.4%
2023	323	77	19.3%
2024	332	64	16.2%
2025	346	51	12.8%
2026	358	39	9.8%
Average	319	73	18.7%
Median	323	77	19.3%

Area 3A Non-transferable CHPs

Year	Financial Compensation received?		
	No	Yes	% Yes
2020	42	18	30.0%
2021	37	17	31.5%
2022	44	19	30.2%
2023	40	23	36.5%
2024	43	20	31.7%
2025	46	16	25.8%
2026	52	11	17.5%
Average	43	18	29.0%
Median	43	18	30.2%

- Greater levels of self-reported 'leasing' in Area 3A (i.e., an average of 19% versus Area 2C's 17%).
- In both areas a greater proportion of the active non-transferable CHPs that are leased compared to the proportion of transferable permits that are leased.

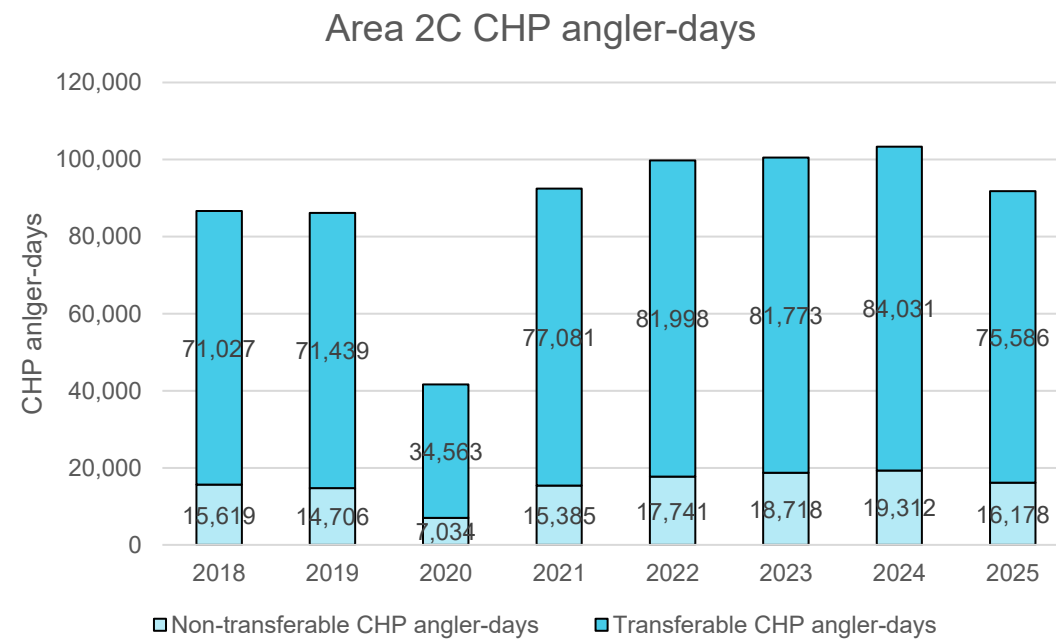
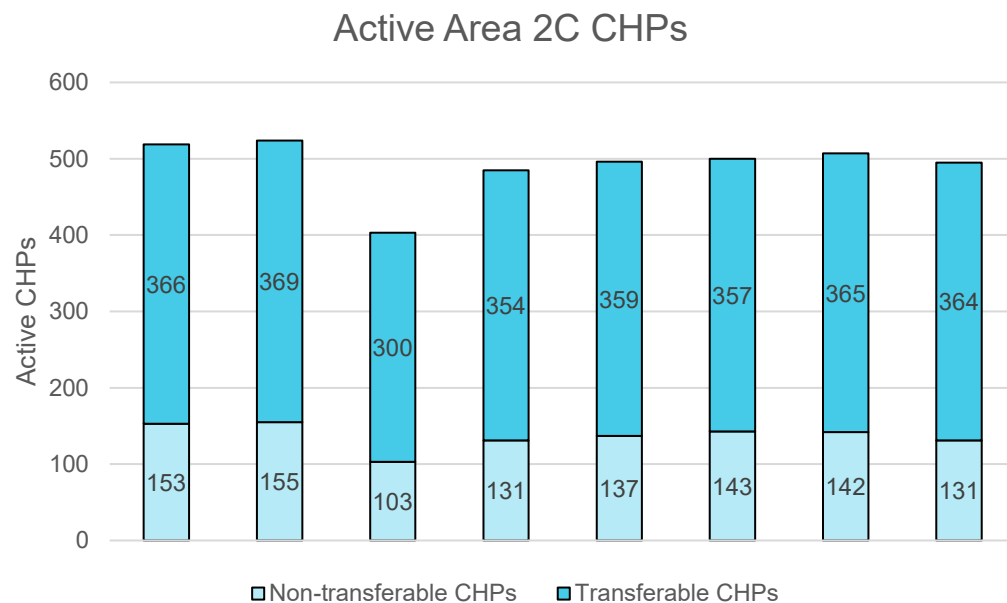


Request #3: Transferable CHP use and non-transferable CHP use

- This data request required use of ADF&G Saltwater logbook data merged with data on CHP characteristics
 - CHP trips = vessel-level trips in which halibut was caught and retained
 - CHP angler-days = angler trips in which halibut was caught and retained
 - *Definitions are different than typically used in ADF&G analysis and in request #6 and #7*
- Data quality has substantially improved (eLogbooks and CHP registration); however, some errors were still evident
- While some errors persists, data is expected to be sufficient to demonstrate high-level trends
- Data quality and accountability will likely improve with the Charter Halibut Stamp implementation.



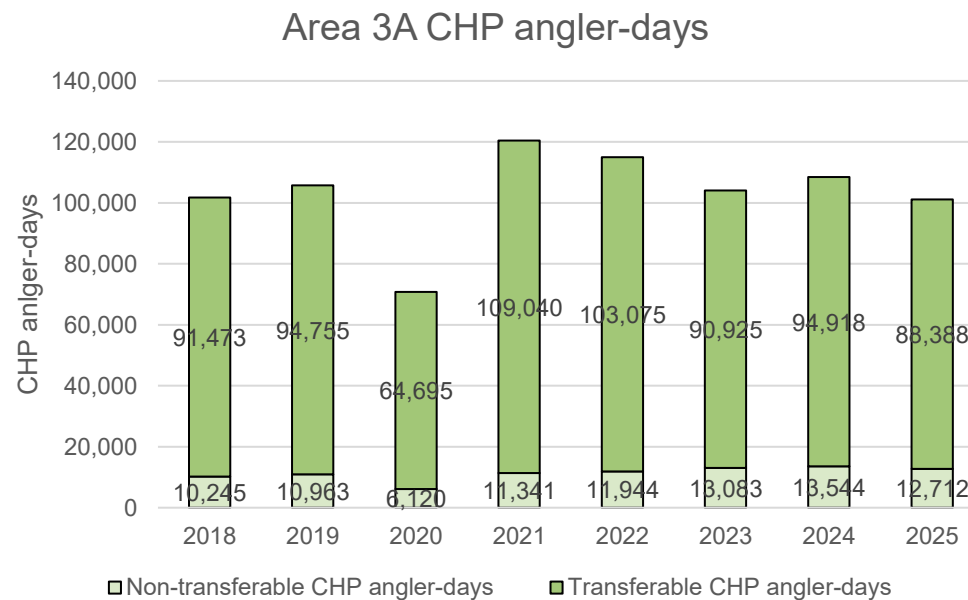
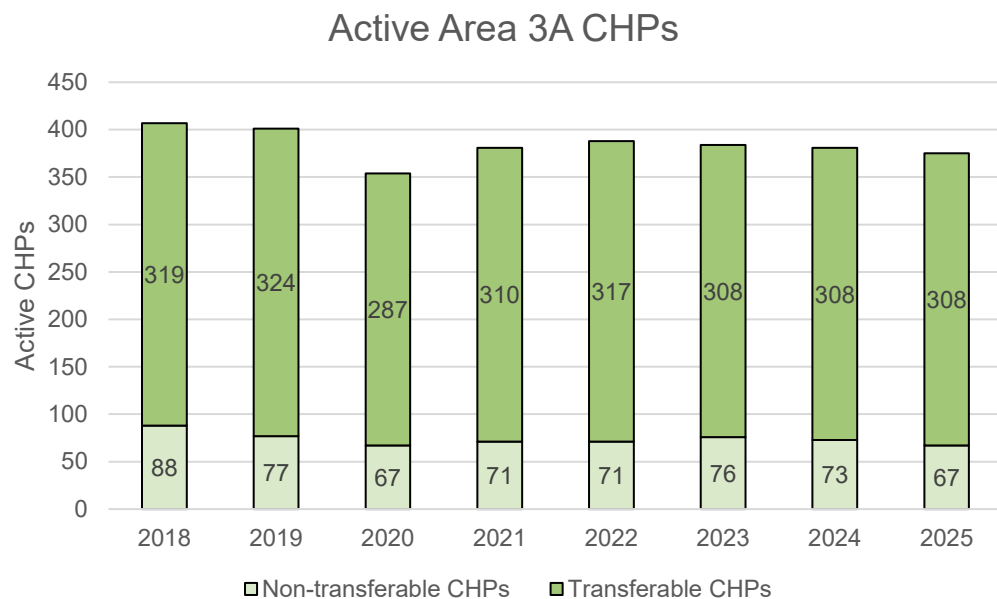
Request #3: Transferable CHP use and non-transferable CHP use



Corresponds with Table 8 and Table 9 Number of active CHPs and number of angler-days, 2018-2025



Request #3: Transferable CHP use and non-transferable CHP use

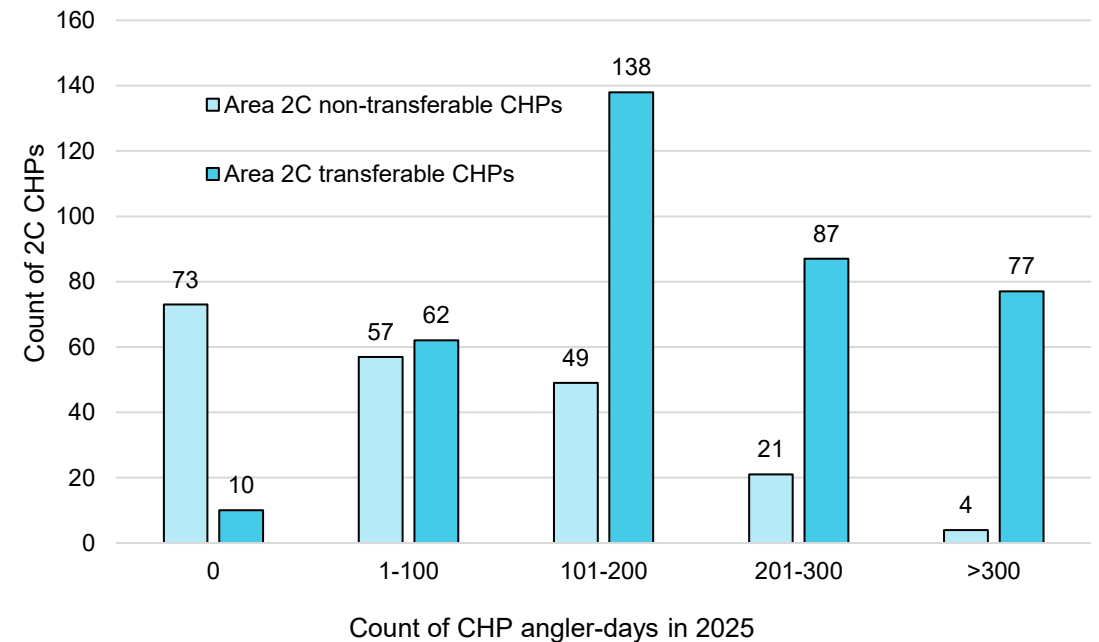
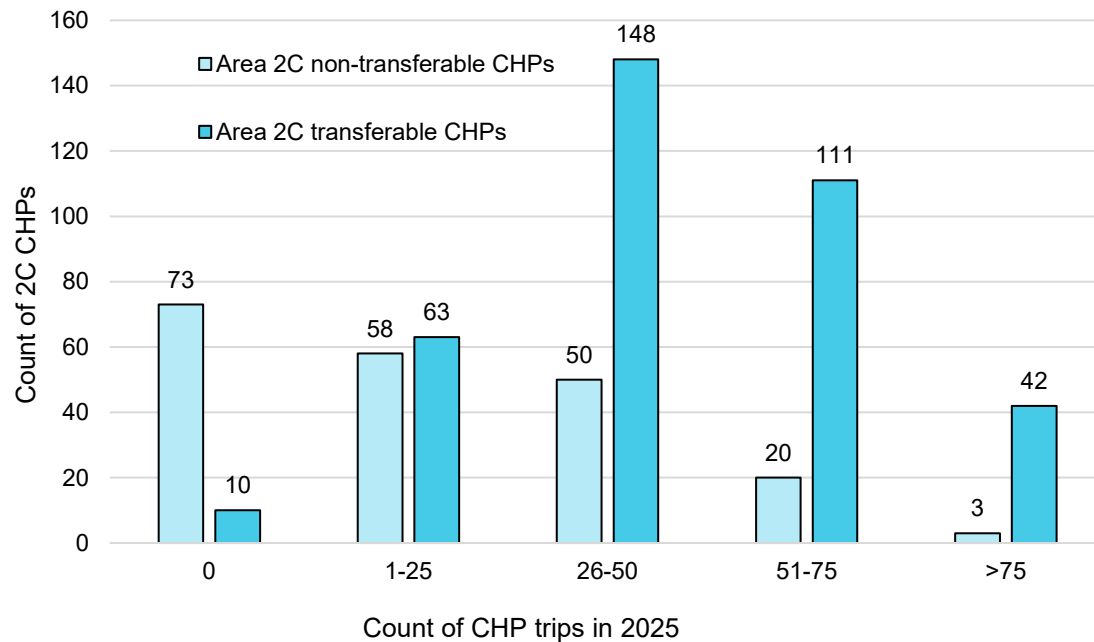


Corresponds with Table 8 and Table 9 Number of active CHPs and number of angler-days, 2018-2025



Request #3: Transferable CHP use and non-transferable CHP use

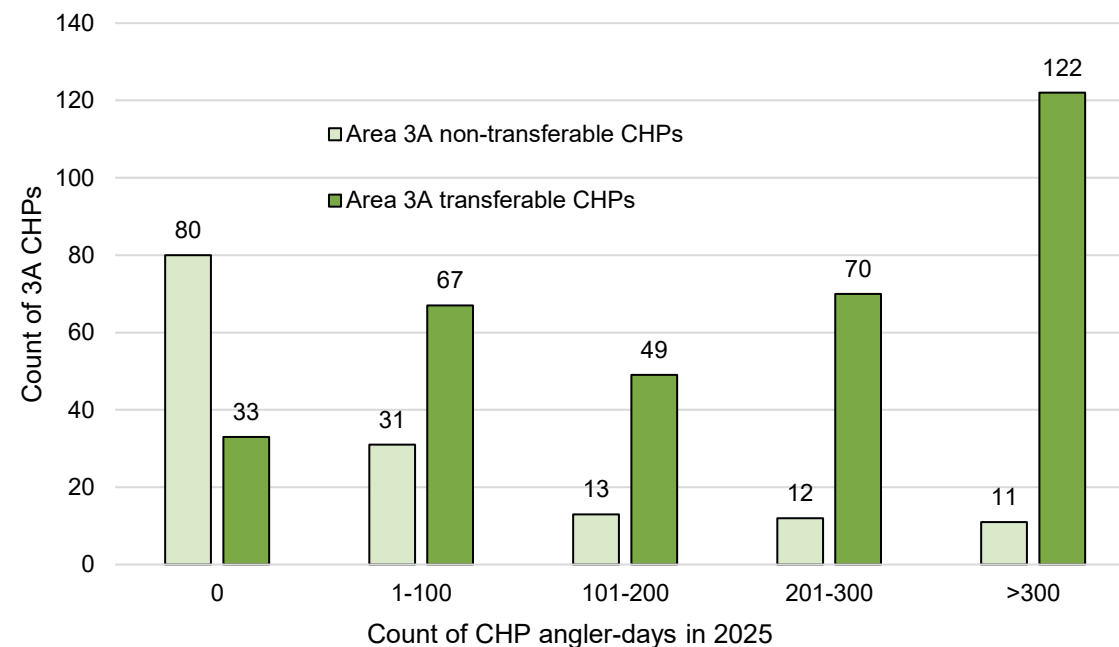
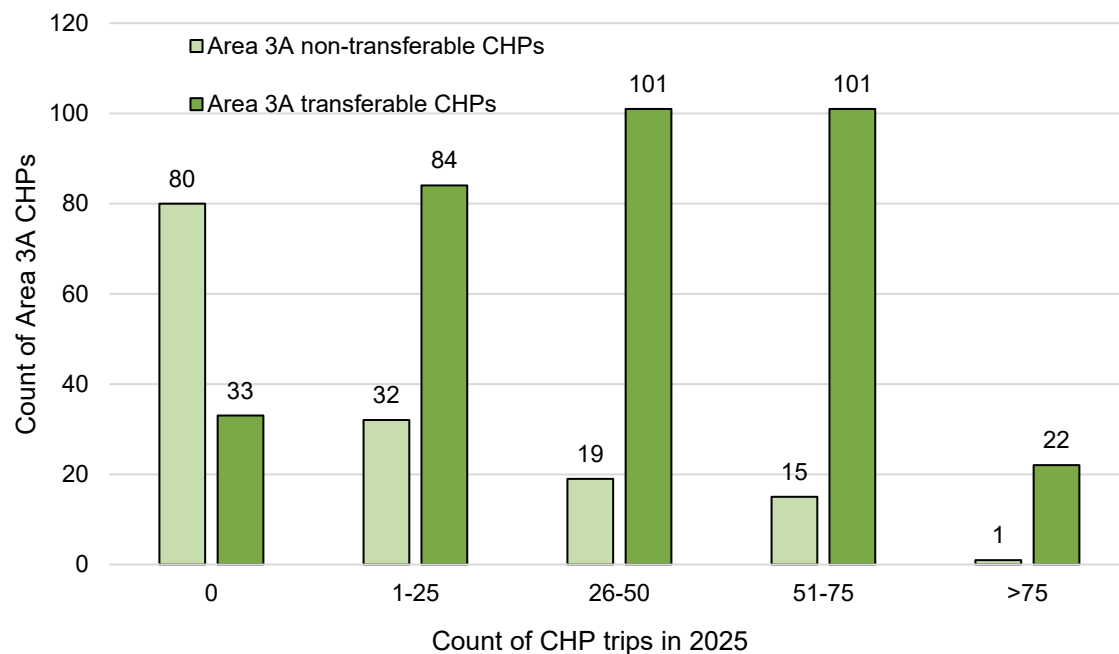
Figure 3 CHP halibut trips and angler days by transferable and non-transferable CHP for Area 2C, 2025



Corrected in the errata

Request #3: Transferable CHP use and non-transferable CHP use

Figure 4 CHP halibut trips and angler days by transferable and non-transferable CHP for Area 3A, 2025



Request #4: Use of CQE CHP issued to non-active CQE entities

- CQE are non-profit entities that represent an eligible community in the GOA or AI
- They may apply for special community CHPs through NMFS
- 20 CQEs hold 104 community CHPs across both areas
- Based on AK Department of Commerce, Community and Economic Development searchable database 4 of the 20 have been 'involuntary dissolved'
- CQE permits not required to be re-registered each year and the regulations are silent as to whether a CQE's status invalidates a community CHP
- Table 12 provides a summary of activity

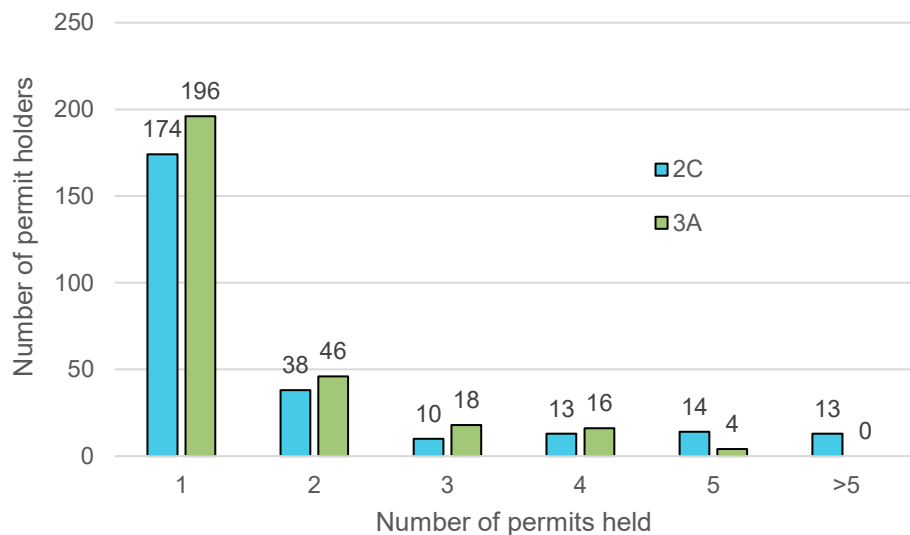
Table 12 CQE charter halibut permit activity, 2018-2025

Area 2C CQE charter permit activity			
Year	Count of CQEs	Count of businesses	Count of trips
	(out of 12)		
2018	11	35	569
2019	10	34	570
2020	9	21	207
2021	10	26	533
2022	9	21	508
2023	8	23	566
2024	8	25	647
2025	9	21	426

Area 3A CQE charter permit activity			
Year	Count of CQEs	Count of businesses	Count of trips
	(out of 8)		
2018	8	22	254
2019	6	18	171
2020	6	11	75
2021	6	19	305
2022	5	11	328
2023	5	16	386
2024	5	14	385
2025	5	11	339

Request #5: CHP holdings caps and use

Adapted from Table 13 Count of permit holders by number of CHPs held, 2026



- Table 13 shows distribution of permits held in 2026. The majority of permit holder have 1 permit.
- In Area 2C, 27 CHP holders at or over the cap and in Area 3A, 4 CHP holders at the cap. Focused on these CHP holders (34-35 entities between 2018-2025).
- No easy way to discern trips with leased CHPs or the relationship between CHP holder and user (unless the same name).
- Took an approach by comparing the number of permits held by a CHP holder at the cap to the number of permit they used (i.e., matched with their business name).
- Not *necessarily* a lease and not being defined that way but intended to demonstrate a sense of consolidation and address the request.



Request #5: CHP holdings caps and use

- The business names of these 34-35 CHP holders were then matched with business names in ADF&G logbook activity when possible
- Could do this with 20-25 businesses (possible some CHP holders leased or were inactive)
- Most businesses that could be evaluated use their full number of CHPs or more.
- In aggregate these businesses consistently use over their number of CHPs (Table 15)
- The drop after 2019 likely due to improved data quality (eLogbooks and registrations) which could have a large impact on the number of reported CHPs used

Table 15 Use of CHPs for businesses that are at or above the CHP cap

Year	Number of businesses	CHPs used	CHPs held	Difference
2018	23	326	176	150
2019	24	333	187	146
2020	20	180	152	28
2021	23	191	156	35
2022	25	226	192	34
2023	25	230	183	47
2024	24	227	174	53
2025	23	229	169	60

Big thanks to Ben Jevons for a lot of extra effort here!

Request #6: Projection of maximum effort under relaxed management measures

6. Holding constant the most recent Fishery Constant Exploitation Yield (FCEY), average weight, and harvest per unit effort (HPUE), project the maximum effort level allowing for the following harvest measures:

Area 2C

- U45O80 reverse slot with no additional harvest measures
- One fish of any size with no additional harvest measures
- Two fish of any size with no additional harvest measures

Area 3A

- One fish of any size and a second fish of 28" or less, closed Wednesdays, and a one-trip daily limit
- One fish of any size and a second fish of 32" or less, with no additional harvest measures
- Two fish of any size with no additional harvest measures

Request #6: Projection of maximum effort under relaxed management measures **Area 2C**

Holding constant the most recent FCEY, average weight, and HPUE, project the maximum effort level allowing for the following harvest measures:

➤ **U45O80 reverse slot with no additional harvest measures**

Table 16 Projected effort in 2C required to achieve a U45O80 reverse slot limit with no additional harvest measures

36% reduction in effort					
Subarea	Original 2025 Effort	Plus Tues Effort	Reduced 2025 Effort	HPUE	Projected Harvest
A	25,107	29,585	18,934	0.513	9,713
B	24,766	29,333	18,773	0.832	15,628
C	2,282	2,605	1,667	0.752	1,254
D	32,591	38,109	24,390	0.815	19,871
EF	12,334	14,554	9,315	0.782	7,288
G2C	10,465	12,920	8,269	0.791	6,539
Total 2C	107,545	127,106	81,348	0.741	60,293

Request #6: Projection of maximum effort under relaxed management measures **Area 2C**

➤ One fish of any size with no additional harvest measures

Table 17 Projected effort in 2C required to achieve a one fish of any size limit with no additional harvest measures

62% reduction in effort					
Subarea	Original 2025 Effort	Plus Tues Effort	Reduced 2025 Effort	HPUE	Projected Harvest
A	25,107	29,585	11,242	0.513	5,767
B	24,766	29,333	11,147	0.832	9,279
C	2,282	2,605	990	0.752	744
D	32,591	38,109	14,481	0.815	11,798
EF	12,334	14,554	5,531	0.782	4,327
G2C	10,465	12,920	4,910	0.791	3,882
Total 2C	107,545	127,106	48,300	0.741	35,797

➤ Two fish of any size with no additional harvest measures

Request #6: Projection of maximum effort under relaxed management measures **Area 3A**

Holding constant the most recent FCEY, average weight, and HPUE, project the maximum effort level allowing for the following harvest measures:

- **One fish of any size and a second fish of 28" or less, closed Wednesdays, and a one-trip daily limit**

Table 18 Projected effort in Area 3A required to achieve one fish of any size and a second fish of 28", closed Wednesdays, and a one-trip daily limit

18% reduction in effort					
Subarea	Original 2025 Effort	Plus Tues Effort	Reduced 2025 Effort	HPUE	Projected Harvest
CCI	11,875	14,903	12,220	1.795	21,936
EPWS	3,737	4,413	3,619	1.397	5,056
G3A	830	1,097	900	0.629	566
H	2,888	3,546	2,908	0.992	2,883
LCI	38,206	47,107	38,628	1.733	66,945
NG	24,131	28,900	23,698	1.337	31,683
QR	10,283	12,073	9,900	1.183	11,712
WPWS	4,642	5,648	4,631	1.098	5,086
Total 3A	96,592	117,685	96,503	1.512	145,867

Request #6: Projection of maximum effort under relaxed management measures **Area 3A**

- One fish of any size and a second fish of 32" or less, with no additional harvest measures

Table 19 Projected effort in Area 3A required to achieve one fish of any size and a second fish of 32" with no additional harvest measures

42% reduction in effort							
Subarea	Original 2025 Effort	Plus Tues & Wed Effort	Reduced 2025 Effort	HPUE	Projected Harvest	% Increase No Trip Limit	Projected Harvest No Trip Limit
CCI	11,875	17,931	10,400	1.795	18,668	16.10%	21,680
EPWS	3,737	5,089	2,952	1.397	4,124	0.00%	4,126
G3A	830	1,364	791	0.629	498	0.00%	498
H	2,888	4,204	2,438	0.992	2,418	3.50%	2,503
LCI	38,206	56,008	32,485	1.733	56,298	16.60%	65,634
NG	24,131	33,669	19,528	1.337	26,108	0.40%	26,214
QR	10,283	13,863	8,041	1.183	9,512	0.50%	9,562
WPWS	4,642	6,654	3,859	1.098	4,238	0.20%	4,245
Total 3A	96,592	138,400	80,494	1.512	121,864	10.60%	134,461

Request #6: Projection of maximum effort under relaxed management measures **Area 3A**

➤ Two fish of any size with no additional harvest measures

Table 20 Projected effort in Area 3A required to achieve two fish of any size with no additional harvest measures

57% reduction in effort							
Subarea	Original 2025 Effort	Plus Tues & Wed Effort	Reduced 2025 Effort	HPUE	Projected Harvest	% Increase No Trip Limit	Projected Harvest No Trip Limit
CCI	11,875	17,931	7,710	1.795	13,840	16.10%	16,073
EPWS	3,737	5,089	2,188	1.397	3,057	0.00%	3,058
G3A	830	1,364	587	0.629	369	0.00%	369
H	2,888	4,204	1,808	0.992	1,793	3.50%	1,856
LCI	38,206	56,008	24,083	1.733	41,738	16.60%	48,659
NG	24,131	33,669	14,478	1.337	19,356	0.40%	19,435
QR	10,283	13,863	5,961	1.183	7,052	0.50%	7,089
WPWS	4,642	6,654	2,861	1.098	3,142	0.20%	3,147
Total 3A	96,592	138,400	59,676	1.512	90,347	10.60%	99,686

Request #7: Management measures under full RQE transfer

7. Holding constant the most recent FCEY, average weight, HPUE, and angler effort, project the maximum harvest measures available assuming full RQE pools:
- For 2C use a reverse slot table
 - For 3A, in order, increase size of the second fish up to 32", open up days of the week

"Full RQE pool" = The RQE is limited to:

- A total of 10% of the Area 2C QS pool and
- A total of 12% of the Area 3A QS pool

These amounts include what can be transferred as Guided Angler Fish (discussed after this)

Request #7: Management measures under full RQE transfer Area 2C

Table 21 Area 2C charter allocation and maximum pounds available if the RQE had historically held up to the Area 2C cumulative transfer cap

Year	Charter allocation (lb)	Ratio (QS: IFQ)	Max RQE holdings (lb)	Adjusted allocation = base allocation + max holdings (lb)
2014	761,000	17.9395	331,544	1,092,544
2015	851,000	16.1667	367,901	1,218,901
2016	906,000	15.1573	392,401	1,298,401
2017	915,000	14.1209	421,201	1,336,201
2018	810,000	16.6603	357,001	1,167,001
2019	820,000	16.4757	361,001	1,181,001
2020	780,000	17.4421	340,999	1,120,999
2021	810,000	16.8491	353,000	1,163,000
2022	820,000	16.9451	351,001	1,171,001
2023	800,000	17.4421	340,999	1,140,999
2024	810,000	16.9935	350,001	1,160,001
2025	720,000	19.3142	307,946	1,027,946
2026	650,000	21.1198	281,619	931,619

- RQE cumulative limit of 10% of the 2015 commercial QS pool for Area 2C (5,947,740 QS units)
- Table 21 - translated into pounds for Area 2C
- Also shows max possible 'adjusted allocation' = charter allocation + max RQE holdings each year

Request #7: Management measures under full RQE transfer Area 2C

Table 23 Hypothetical charter halibut management measures for Area 2C in 2026 using the adjusted charter halibut allocations (base allocation + maximum RQE holdings) from the timeseries, applied to 2026 projected harvest

Year	Adjusted allocation = base allocation + max holdings (lb)	Hypothetical 2026 management measures under adjusted allocations from previous years and 2026 projected harvest
2014	1,092,544	U44 O80
2015	1,218,901	U48 O78
2016	1,298,401	U50 O76
2017	1,336,201	U50 O74
2018	1,167,001	U46 O76
2019	1,181,001	U47 O80
2020	1,120,999	U45 O80
2021	1,163,000	U46 O76
2022	1,171,001	U46 O76
2023	1,140,999	U45 O76
2024	1,160,001	U46 O78
2025	1,027,946	U42 O80
2026	931,619	U38 O76

- Ran scenarios of what 2026 management measures could have been with max 'adjusted allocation' for Area 2C
- 2026 Area 2C measures were actually:
 - *One fish daily bag limit*
 - *U34O80*
 - *Thursday closures, June 18- Sept 10 (12 Thursday closures)*
- With an 'adjusted allocation' in 2026 from full RQE holdings, Area 2C may have had:
 - *One fish daily bag limit*
 - *U38O76*
- Also looked at 2026 measures under different hypothetical adjusted allocations

Request #7: Management measures under full RQE transfer **Area 3A**

Table 24 Area 3A charter allocation and maximum pounds available if the RQE had historically held up to the Area 3A cumulative transfer cap

Area 3A (RQE cap of 22,187,161 units)				
Year	Charter allocation (lb)	Ratio (QS: IFQ)	Max RQE holdings (lb)	Adjusted allocation = base allocation + max holdings (lb)
2014	1,782,000	25.2664	878,129	2,660,129
2015	1,890,000	13.3991	1,655,869	3,545,869
2016	1,814,000	15.508	1,430,691	3,244,691
2017	1,890,000	13.914	1,594,593	3,484,593
2018	1,790,000	25.1555	882,000	2,672,000
2019	1,890,000	22.9396	967,199	2,857,199
2020	1,710,000	26.226	845,999	2,555,999
2021	1,950,000	20.1724	1,099,877	3,049,877
2022	2,110,000	19.3605	1,146,001	3,256,001
2023	1,890,000	23.5833	940,800	2,830,800
2024	1,890,000	24.4567	907,202	2,797,202
2025	1,480,000	31.2557	709,860	2,189,860
2026	1,470,000	30.9962	715,803	2,185,803

- RQE cumulative limit of 12% of the 2015 commercial QS pool for Area 3A (22,187,161 QS unit)
- Table 24 - translated into pounds for Area 3A
- Also shows max possible 'adjusted allocation' = charter allocation + max RQE holdings each year

Request #7: Management measures under full RQE transfer **Area 3A**

Table 27 Comparison of maximum Area 3A adjusted charter allocation relative to the projected removals for Area 3A in 2025 for the least restrictive management measures

Year	Adjusted allocation = base allocation + max holdings (lb)	Difference between adjusted allocation from each year and 2.289 Mlb projected removals for 2025 least restrictive management measures*
2014	2,660,129	371,129
2015	3,545,869	1,256,869
2016	3,244,691	955,691
2017	3,484,593	1,195,593
2018	2,672,000	383,000
2019	2,857,199	568,199
2020	2,555,999	266,999
2021	3,049,877	760,877
2022	3,256,001	967,001
2023	2,830,800	541,800
2024	2,797,202	508,202
2025	2,189,860	-99,140
2026	2,185,803	-103,197

- Ran scenarios of what 2026 management measures could have been with max 'adjusted allocation' for Area 3A
- 2026 Area 3A measures were actually:
 - *Two fish daily bag limit, with U27 for one fish*
 - *Wednesday closed all year*
 - *Tuesday closures, June 2- Aug 25 (13 Tuesdays)*
 - *One trip per CHP and per vessel per day*
- Analysis of management options in 2026 did not cover a wide enough range for potential measures under adjusted allocations
- Considered the management measures analysis from 2025 to provide:
 - *Two fish daily bag limit, with U32 for one fish*
 - *One trip per CHP and per vessel per day*
- Table 27 shows substantial remaining allocation in most years at these measures

Request #7: Management measures under full RQE transfer

Table 28 Summary of GAF IFQ transfers and net pounds harvested, 2014- 2025

Year	Area 2C			Area 3A		
	IFQ lb transferred	Net lb harvested as GAF	Cumulative RQE-GAF transfer limit (converted into lb)	IFQ lb transferred	Net lb harvested as GAF	Cumulative RQE-GAF transfer limit (converted into lb)
2014	29,498	53,864	331,544	11,654	10,336	878,129
2015	36,934	27,849	367,901	10,337	5,158	1,655,869
2016	47,064	38,968	392,401	10,442	9,332	1,430,691
2017	53,206	40,860	421,201	9,786	6,920	1,594,593
2018	80,656	64,365	357,001	12,760	9,052	882,000
2019	97,680	75,039	361,001	13,524	10,652	967,199
2020	57,645	55,061	340,999	5,240	2,147	845,999
2021	97,056	76,529	353,000	11,913	3,446	1,099,877
2022	128,094	99,962	351,001	11,475	6,487	1,146,001
2023	143,520	109,952	340,999	17,089	8,430	940,800
2024	175,070	147,739	350,001	20,677	5,509	907,202
2025	264,674	230,541	307,946	64,752	45,799	709,860

- Cumulative transfer limit between RQE and GAF is shared
- GAF use has increased dramatically in Area 2C, with large increase in 2024-25 in Area 3A as well
- In 2025, ~265,000 lb of halibut transferred as GAF in Area 2C. These leaves ~43,000 lb short of the limit
- However, in practice the RQE holdings will dictate available remainder for GAF transfer.
- Could be a point of tension in the future for operators that have come to rely on GAF.

Next Steps

- This discussion paper does not direct specific action, although next steps may be considered
- Next steps could be an expanded discussion paper, or an analysis if purpose and need statement as well as a set of alternatives are identified.



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