



Charter Halibut Management Committee REPORT

December 3, 2024

The North Pacific Fishery Management Council's Charter Halibut Management Committee held an in person/ online hybrid meeting on Wednesday, December 3, 2024. At this meeting the Committee provided recommendations on a range of charter halibut management measures (e.g., bag limits, size restrictions) for each International Pacific Halibut Commission Area 2C and 3A. All meeting materials are posted to the eAgenda.¹

Committee members in attendance:

Brian Ritchie (Area 3A; <i>chair</i>)	Seth Bone (Area 2C)	Forrest Braden (Area 2C)
Daniel Donich (Area 3A)	Scott McKelvey (Area 2C)	Kent Huff (Area 2C)
Matt Kopec (Area 3A)	Stan Malcolm (Area 2C)	
Richard Yamada (Area 2C)	Steve Zernia (Area 3A)	Sarah Marrinan (<i>staff coordinator</i>)

Members absent:

Mike Flores (Area 3A)

Others in attendance:

Adam St. Saviour	Ben Jevons	Chelsea Schmitt
Kurt Iverson	Tom Gemmell	Cheyenne Lambert
Tiffany Cross	Paul Olson	Kayla Buster
Adrienne Swan	Kim Landeen	Russ Dunn
Chris Conder	Clay Duda	Andy Mezirow
Joel Steenstra	Phil Joy	Bonny Millard
Maddie Lightsey	Kim Landeen	Katherine Papacostas
Maria Davis		

Committee chair, Brian Ritchie called the meeting to order and members and participants provided introductions.

Analysis of 2025 Charter Halibut Management Measures

The Committee received a presentation of the ADF&G analysis of management options for the Area 2C and 3A charter halibut fisheries for 2025 from Adam St. Saviour (ADF&G). This report and the corresponding presentation are linked in the eAgenda. Given the uncertainty around IPHC allocation decisions for 2025, the analysis used the 2024 allocations as a reference, which were **0.810 Mlb for Area 2C** and **1.89 Mlb for Area 3A**; however, Committee members also needed to consider a range of potential allocations above and below this allocation.

¹ Link to eAgenda with all meeting materials and written public comment:
<https://meetings.npfmc.org/Meeting/Details/3068>

Public Testimony

In addition to the two written public comment letters on the Committee's eAgenda, the Committee received oral public comment from six individuals: Chris Conder and Adrienne Swan, Clay Duda, Tom Gemmell, Bonny Millard, and Joel Steenstra.

Public comment focused on a number of topics. Three of the testifiers spoke to the Area 2C proposed measures. Two individuals were strongly opposed to the use of trip limits, highlighting a distinction between lodge operations and day boat operations in Southeast Alaska. They felt this measure unfairly targeted the day boats and put more of the burden on those that depended on cruise ship passengers without substantial savings in halibut removals. These testifiers also expressed concern over day of the week closures; they noted that the particular day that is closed has varied over the years and this inconsistency has interfered with their business planning and customer reservations. These testifiers also indicated that among management measures, they preferred annual limits. A third individual testified in support of using trip limits and changing the day of the week closure to different day each year. Also, when needed, one testifier noted support in Area 2C for using a differential reverse slot limit that changed mid-season because early season halibut opportunity is the most important for many ports, due to limited alternatives.

Some testifiers felt the regulatory process for management measures has been working, despite the challenging position for Area 2C. One testifier appreciated the relative stability in the measures chosen for Area 3A area but was also concerned about recent underages for this area and felt it was hard to trust the projections when they kept coming in under. One testifier highlighted concern about accountability and enforcement in the charter/ recreational sector.

Recommended Management Measures for 2025

Area 2C

The Charter Halibut Management Committee recommends the following harvest measures for the Area 2C guided recreational halibut fishery in 2025:

All allocations shown below include a daily bag limit of one halibut and a reverse slot size limit where the upper limit is fixed at O80 (halibut 80 inches or longer may be retained), and a restriction of 1 trip per charter vessel per day with retention of halibut and 1 trip per charter halibut permit per day.

- 1) If the allocation falls within the range of 0.897 Mlb and 1.013 Mlb:
 - begin with a lower size limit of U38 (retained halibut must be less than or equal to 38 inches in length) and increase this limit until the allocation is reached, as indicated in **Table 2C.7a** of the ADF&G analysis.
- 2) If the allocation is less than 0.897 Mlb but greater than or equal to 0.752 Mlb:
 - begin with a lower size limit of U38 (retained halibut must be less than or equal to 38 inches in length) closing Tuesdays starting September 9 working to May 13 until the allocation is reached, as indicated in **Table 2C.7a** of the ADF&G analysis.
- 3) If the allocation is less than 0.752 Mlb but greater than or equal to 0.715 Mlb:
 - begin with a lower size limit of U37 (retained halibut must be less than or equal to 37 inches in length) closing Tuesdays from Sept 9 to June 24, and closing additional Tuesdays working to May 13 until the allocation is reached, as indicated in **Table 2C.7a** of the ADF&G analysis.

Rationale and discussion:

Area 2C Committee members emphasized that once again the persistent low state of halibut abundance has put them in a dire state for management measure options. They worked to consider equitable measures that fit a diverse set of angler expectations and business models on what will likely be a very slim halibut allocation, with growing effort in some areas. As they considered options this year, 2C committee members developed these regulations with consideration to industry input (which is the best proxy for angler preference) that ranged from support for no day closures and letting the lower size limit fall accordingly, to 2 days of the week closed to maintain a better lower size limit. There was strong debate and diverse opinions within the committee itself. It took thoughtful and strong compromise to arrive at a vote to support these measures.

With the adoption of trip limits (1 trip per charter vessel per day, which has not been done for Area 2C previously), members noted they considered history by port. Effort increases for the 2024 season showed largely in ports with cruise ships. With the amount of halibut allocation available to the 2C guided sport fishery, the committee did not believe that there should be two halibut trips in a single day. There was testimony in favor of maintaining the option for 2 halibut trips per day and this perspective was considered. Further engagement from these members of the public and their associations was encouraged.

There were also some comments from Area 2C members expressing frustration with the program that was meant to stabilize the fishery and reduce growth. Instead, they feel they are in an unforeseen and untenable place. Members noted that the motion did not go below 12% of the allocation from 2024, because management measures that were necessary to address catch limits lower than this level felt truly untenable to the industry, and they did not know how to choose to operate under this range. The Council has the option to modify the motion to reflect greater declines.

Area 3A

The Charter Halibut Management Committee recommends the following harvest measures for the Area 3A guided recreational halibut fishery for 2025:

All allocations shown below include, unless otherwise specified: a daily bag limit of 2 halibut; one fish of any size and one fish with a maximum size limit of 28 inches; 1 trip per charter vessel per day with retention of halibut; and 1 trip per charter halibut permit per day.

- 1) If the allocation is less than or equal to 2.079Milb, but greater than or equal to 1.762 Milb, apply:
 - Close Wednesdays as needed to keep charter harvest removals within the Area 3A allocation, as indicated in **Table 3A.13** of the ADF&G analysis.
- 2) If the allocation is less than 1.762- Milb, but greater than 1.497 Milb:
 - In addition to all closed Wednesdays and a second halibut 28 inches or less, close as many Tuesdays as needed to keep the charter harvest removals within the Area 3A allocation, as indicated in **Table 3A.14** of the ADF&G analysis.
- 3) If the allocation is below 1.497 Milb:
 - In addition to closing all Tuesdays and Wednesdays, lower the size of the second fish to as low as 26 inches, until the projected charter harvest removals meet the allocation. This covers allocations as low as 1.425 Milb as indicated in **Table 3A.16** of the ADF&G analysis.

Rationale and discussion:

Area 3A Committee members noted they were considering consistency for anglers and operators as much as possible when making the range of recommended measures. Their range of possible measures include status quo measures, it could potentially include less closed Wednesday depending on the allocation chosen at the IPHC, and they also included measures down to a 25% decline in allocation. Members also noted concerns around the persistent underages for Area 3A. This appears to come from both projecting more and larger fish in this area, and they are hoping the measures ultimately adopted dial in their actual harvest a little closer than recent years.

Other Business

The Charter Halibut Management Committee voted unanimously to recommend initiation of discussion paper on Charter Halibut Permit use. The motion states:

The Charter Halibut Management Committee requests fresh analysis of CHP use of transferable, non-transferable, CQE, and Military permits for areas 2C and 3A. This data could be useful in understanding disappearing angler opportunity in the charter halibut fishery and in projecting how latent capacity in the permit program might affect future angler effort and the resulting effects on harvest measures.

Analysis would include separate data for Areas 2C and 3A of the following:

- Trends in transfer (including lease transfer of transferable, non-transferable, and CQE permits), consolidation, and retirement since implementation
- Trends in usage since program implementation for each permit type (transferable permits only needed to hit a 15-trip threshold, and non-transferable permits a 5-trip threshold)
- Trends and projections of latent capacity in terms of both permits and angler endorsements
- Projections of the effects of latency by area with CHPs at low, medium and max usage on harvest measures, with and without RQE aggregate caps reached.

Rationale:

Members stated that since implementation of the Charter Halibut Limited Access Program in 2011 there have been substantial changes in circumstance for the Alaska guided halibut sport fishery. Allocations are at low levels and likely to drop further in the near future.

The CHLAP proposed rule states “The intended effect [of the limited access program] is to curtail growth of fishing capacity in the guided sport fishery for halibut.” And again, “An objective of limited access programs, including this one, is to reduce the amount of fishing effort in a fishery.”

With low activity thresholds for initial CHP issuance, the addition of CQE and Military CHPs not based on any historical participation in the fishery, and the allowance of leasing of both transferable and non-transferable permits, the CHLAP does not appear to be meeting objectives. There appears to be substantial latency in the program. Angler days have measurably increased in Area 2C since the base years of CHP qualification. Decreases in effort in Area 3A since 2014 appear to be the result of the application of day closures and not constraints in participation driven by the CHLAP.

Previous analysis on CHP use lacked data now available to the Council and provided more of a snapshot and less of picture of trend. It also did not attempt to evaluate latency in the program and potential effects on harvest measures and consequent repercussions to participants the CHLAP aimed to protect.

Additional analysis of trends in the CHP transfer and use, latency in the CHLAP program, and projections of the effects of latency on future harvest measures will help shed light on the effectiveness of the program and lay the groundwork for any needed adjustments to the program or related programs that affect stability, capacity, and viability of the charter halibut fishery.