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

Presenter: Sarah Marrinan
Advisory Panel, 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 AND SCOPE

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.
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
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)
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.
HALIBUT MANAGEMENT

Area Total Constant Exploitation Yield (TCEY)
Limit set by the IPHC

Subtract other projected removals from that area (non-FCEY):
- Projected subsistence harvest
- Projected unguided sport harvest
- Projected O26 bycatch in non-target commercial fisheries

Fishery Constant Exploitation Yield (FCEY)
Annual Combined Catch Limit*
Commercial and Guided Sport harvest + discard mortality for both

Use proportions of CCL determined in the CSP

Charter Halibut Allocation
Includes limit on harvest and a rate-based projection of discard mortality

Commercial Halibut Allocation
Includes limit on harvest and a rate-based projection of discard mortality

Subtract projected discard mortality (rate based)

Commercial Catch Limit

Figure 9, page 23
MORTALITY ACROSS SECTORS AND AREAS

Source information in document
Commercial = commercial landings, FISS and research, Metlakata harvest and commercial discard mortality; Recreational = guided and unguided harvest, discard mortality and Guided Angler Fish; Subsistence = Subsistence harvest; Bycatch = non-target commercial discard mortality

Figure 11 & 12, page 30
MORTALITY ACROSS SECTORS AND AREAS

Source information in document:
Commercial = commercial landings, FISS and research and commercial discard mortality; Recreational = guided and unguided harvest, discard mortality and Guided Angler Fish; Subsistence = Subsistence harvest; Bycatch = non-target commercial discard mortality

Figure 13 & 14, page 32
BACKGROUND ON THE ALLOCATIONS AND MANAGEMENT ESTABLISHED IN THE CSP
AREA 2C ALLOCATIONS

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

Table 7 & Figure 15, page 34
# ALLOCATION HISTORY FOR AREA 2C

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

* CCL adopted by NMFS in 2018.

Table 8, page 35
## AREA 3A ALLOCATIONS

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

Table 9 & Figure 16, page 35
### ALLOCATION HISTORY FOR AREA 3A

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

* CCL adopted by NMFS in 2018.
CHARTER HALIBUT MANAGEMENT PROCESS

September → October → November → December → January → February

Logbook Data → Harvest Estimate → Port Sampling Data

Charter Halibut Management Committee Meeting → Management Alternatives

Forecast Harvest Under Alternative Management Strategies → CHMC Meeting*

Recommendation to NPFMC → NPFMC Meeting*

Recommendation of Preferred Management Measures to IPHC

IPHC Annual Meeting* → Charter Allocation

Catch Limits → Charter Management Measures

IPHC Interim Meeting* → Interim Management Strategy

Reference Harvest Level → Harvest Target

IPHC Stock Assessment

Charter Fishery (February – December)

Key to shapes and colors

| ADFG | NPFMC | IPHC | NOAA Fisheries |

*Indicates opportunity for public comment

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

<table>
<thead>
<tr>
<th>Year</th>
<th>Conversion Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>IFQ lb / GAF</td>
</tr>
<tr>
<td></td>
<td>Area 2C</td>
</tr>
<tr>
<td>2014</td>
<td>26.4</td>
</tr>
<tr>
<td>2015</td>
<td>67.3</td>
</tr>
<tr>
<td>2016</td>
<td>65.1</td>
</tr>
<tr>
<td>2017</td>
<td>74</td>
</tr>
<tr>
<td>2018</td>
<td>71</td>
</tr>
<tr>
<td>2019</td>
<td>66</td>
</tr>
<tr>
<td>2020</td>
<td>61</td>
</tr>
<tr>
<td>2021</td>
<td>72</td>
</tr>
<tr>
<td>2022</td>
<td>74</td>
</tr>
</tbody>
</table>

Section 5.5, page 44 - 47; Table 14, page 45
RECREATIONAL QUOTA ENTITY (RQE)

- 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.

Photo credit: R. Yamada

Section 5.6, page 47-51
Photo credit: R. Yamada
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
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.
Allocation and use post-CSP (2014) include discard mortality, but pre-CSP discard mortality not included. Additional notes and sources in the document.

Figure 20, page 59
# AREA 2C CHARTER MANAGEMENT MEASURES

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

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
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

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

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
Document error: Missing Area 2C permit holders and self-transfers for 2021
Additional notes and sources in the document.
AREA 3A GAF

Additional notes and sources in the document.

Figure 21, page 72
CSP OBJECTIVES
CSP OBJECTIVES – 1. 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

Section 5.4 & Section 7
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.
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.
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 GHL, 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)
- Increased experience and knowledge about how the program has operated
- External/ global changes
NEXT STEPS

Accept review or recommend changes

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.
Thank you to reviewers and persons consulted:

Sarah Webster (ADF&G)
James Hasbrouck (ADF&G)
Ian Stewart (IPHC)
Barbara Hutniczak (IPHC)
Dan Lew (AFSC)
Chang Seung (AFSC)
Marysia Szymkowiak (AFSC)
Steve Kasperski (AFSC)
Darrell Brennan (Brannan & Associates)
Jon McCracken (NPFMC)
Andy Mezirow (Gray Light Sportfishing)
Forrest Braden (True North Sport Fishing)
Richard Yamada (Shelter Lodge)

QUESTIONS?

Sarah Marrinan
sarah.marrinan@noaa.gov