

Discussion Paper:

Charter Halibut Recreational Quota Entity Funding Mechanism

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1 Introduction

This document discusses implementation of a funding mechanism for the charter halibut Recreational Quota Entity (RQE). A brief history of the topic is provided below, and features of the program implementation are introduced later. NMFS recommends adapting two of the elements of the North Pacific Fishery Management Council's (Council's) April 2022 motion to add security, simplicity, and cost-effectiveness to the fee collection. Specifically, NMFS proposes to use its online eFish platform to allow charter operators to purchase electronic halibut stamps, as opposed to contracting with the RQE to perform this task. NMFS also proposes to apply a single \$20 fee for all halibut stamps, rather than adopting a tiered-fee approach of \$20, \$40, and \$60 that would apply to various numbers of days for individual halibut anglers. Because this item was not noticed on the agenda for the June 2024 meeting, NMFS recommends that the Council schedule it for October 2024 and consider a motion at that time.

1.1 RQE Background

In 2018, NMFS implemented regulations that authorize the RQE to act on behalf of charter (sport) halibut operators by purchasing halibut quota shares (QS) from participants in the commercial halibut fisheries in International Pacific Halibut Commission Regulatory (IPHC) Areas 2C (Southeast Alaska) and 3A (Southcentral Alaska). The pounds of halibut from the QS would be added to the annual allocation that the charter halibut sector receives under a Catch Sharing Plan with the directed commercial halibut fishery. In this way, the regulations provide a means to shift halibut allocation from the commercial sector to the charter sector through willing-buyer / willing-seller arrangements.

Under the program rules, the RQE is an entity that conforms to State of Alaska regulations for non-profit organizations. In March 2020, NMFS approved the application of the Catch Accounting Through Compensated Halibut (CATCH) Association to serve as the RQE. The RQE is currently eligible to receive and to permanently hold halibut QS by transfer under the rules of the halibut and sablefish Individual Fishing Quota (IFQ) program.

The RQE regulations establish limits on the amount of QS that the RQE can purchase, both annually and in total. Additionally, the sum of QS purchased by the RQE, plus the QS associated with the charter halibut Guided Angler Fish (GAF) program, may not exceed the total QS purchase limits allowed in the respective Areas 2C or 3A.

Limits were also placed on the specific types of QS that may be purchased by the RQE. In general, the regulations prohibit the RQE from purchasing smaller commercial holdings (i.e. "blocks") of commercial QS as well as QS that is assigned to smaller vessels (e.g. D-class QS).

The regulations also call for a redistribution of QS under circumstances when the RQE might hold “excess” QS. If the RQE holds an amount of QS that allows charter anglers to harvest a daily limit of two halibut of any size in a regulatory area, then any poundage the RQE holds over that amount must be temporarily (for that fishing year) redistributed from the RQE back to the commercial fishery. Fifty percent of the redistributed poundage would be assigned to qualifying Community Quota Entities in the affected area, and the remaining 50 percent would be assigned to persons in that area who hold relatively small amounts of QS; specifically, not more than 32,333 QS units in Area 2C, or 47,469 QS units in Area 3A (the equivalent of 2,000 pounds of IFQ in 2015).

The RQE rules do not contain a method or means for the RQE to obtain funding to make its QS purchases. In 2019, the Council began to analyze options for rules that would establish a fee collection mechanism. Early in the analysis, it was determined that NMFS did not have the authority to regulate RQE funding; consequently, stakeholders began working with members of U.S. Congress to develop legislation that would grant NMFS such authority. In anticipation of the potential enactment of this legislation, the Council simultaneously began the analytical process to explore the administrative requirements necessary to implement an RQE fee collection program.

The NMFS Alaska Region webpage includes additional information on the halibut and sablefish IFQ Program, the current RQE program, Charter Halibut Permits, the GAF program, the Catch Sharing Plan, and Community Quota Entities.

1.2 Legislative Authority

In January 2023, Congress passed H.R. 2617, referenced as the Consolidated Appropriations Act, 2023. The bill was subsequently signed into law by the President of the U.S. The portion of the bill at Division S, Title I, Section 106 authorizes NMFS to develop rules to fund the RQE. Subsequently, the Magnuson-Stevens Fishery Conservation and Management Act was amended with the following language:¹

(a) IN GENERAL.—The North Pacific Fishery Management Council may recommend, and the Secretary of Commerce may approve, regulations necessary for the collection of fees from charter vessel operators who guide recreational anglers who harvest Pacific halibut in International Pacific Halibut Commission regulatory areas 2C and 3A as those terms are defined in part 300 of title 50, Code of Federal Regulations (or any successor regulations).

(b) USE OF FEES.—Any fees collected under this section shall be available for the purposes of—

- (1) financing administrative costs of the Recreational Quota Entity program;
- (2) the purchase of halibut quota shares in International Pacific Halibut Commission regulatory areas 2C and 3A by the recreational quota entity authorized in part 679 of title 50, Code of Federal Regulations (or any successor regulations);
- (3) halibut conservation and research; and
- (4) promotion of the halibut resource by the recreational quota entity authorized in part 679 of title 50, Code of Federal Regulations (or any successor regulations).

¹ See: 16 U.S.C. § 1862 (Supp. 2023)

(c) LIMITATION ON COLLECTION AND AVAILABILITY.—Fees shall be collected and available pursuant to this section only to the extent and in such amounts as provided in advance in appropriations Acts, subject to subsection (d).

(d) FEE COLLECTED DURING START-UP PERIOD.—Notwithstanding subsection (c), fees may be collected through the date of enactment of an Act making appropriations for the activities authorized under this Act through September 30, 2023, and shall be available for obligation and remain available until expended.

Note the law specifies that fees will be collected from charter operators, and that the use of the fees by the RQE is restricted to four categories. Additionally, the collected fees must pass through the Federal Treasury, where the funds will be subject to appropriations.

1.3 The Council’s Motion

From April 2021 through April 2022, the Council analyzed various options for a fee collection mechanism to collect funds from charter operators to fund the RQE. Ultimately, a halibut stamp program became the preferred alternative. At its April 2022 meeting, the Council took final action and unanimously adopted a motion for a halibut stamp program. The Council motion was as follows:

Option 1: Charter Halibut Stamp

Administration

- NMFS will develop regulations to establish the fee requirement for a Charter Halibut Stamp and contract with the RQE to develop the fee collection system (consistent with any legal requirements).
- The Charter Halibut Stamp will be required for charter vessel anglers 18 years of age and older for each day they intend to harvest halibut on a charter vessel fishing trip in regulatory areas 2C and 3A. This includes charter halibut vessels operated and permitted under the Community Quota Entity (CQE) and Military Morale and Welfare (MWR) programs.

Fee amount

- Stamp fees in the first three-years after the implementation of the program cannot exceed the following amounts:
 - A) One-day stamp - \$20.00
 - B) Three-day Stamp – \$40.00
 - C) Seven-day Stamp – \$60.00
- After the first three years of implementation, the RQE may recommend that NMFS increase the fee amounts in each category by up to 10% annually. NMFS will provide the Council with an update on fee increases.

Fee payment

- The Sport Fishing Guide Business Owner or their designee (as defined by ADF&G) will be responsible for paying all required fees.

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- Charter Vessel Guides (as defined by NMFS) will be responsible for ensuring there is a validated halibut stamp on the vessel for each angler subject to the fee for each day of halibut fishing.
- Fee payment and charter halibut stamp validation would need to occur prior to departure prior to start of each fishing day.

In developing these regulations, it is the intent of the Council that NMFS coordinate with the Charter Halibut Committee and the RQE in the development of the stamp requirements and fee collection system and update the Council as appropriate.

The analysis for this action² provides much of the information the Council used to identify a halibut stamp program as its preferred alternative. One of the primary considerations is that charter businesses would pay fees that are proportional to the number of halibut anglers that the business serves. Additionally, the concept of using stamps to access fishing or hunting opportunities is familiar to sportsmen, and this familiarity may facilitate charter businesses' choice to transfer some or all of the cost of the stamps to the charter anglers.

Halibut stamps would be required for charter anglers who intend to harvest halibut, and stamps must be validated for use prior to the departure of each fishing day. The "intention" portion of this motion aligns with the Alaska Department of Fish and Game (ADF&G) king salmon stamp, which is a requirement for Alaska anglers "who fish for king salmon." Validating the stamps for use prior to the start of fishing is primarily an enforcement feature that would prevent charter operators from opportunistically validating stamps only when they believe they will be checked by enforcement officers.

Halibut stamps would apply to charter anglers 18 years and older. The Analysis and the Council's rationale describe this as a feature that is consistent with State of Alaska licensing requirements. State of Alaska fishing licenses and king salmon stamps are required for nonresidents of Alaska age 16 and older, and 18 years and older for State residents. Although a youth angler exemption will reduce the stamp revenue that will be collected, it may also alleviate confusion by aligning regulations with State requirements. The analysis provides estimates that in Area 2C, between 2006 and 2021, an average of 4.3% of the angler days were represented by youth anglers. In Area 3A, similar estimates indicate 5.7% of angler days were represented by youth anglers.

The Council motion also calls for a tiered fee structure that provides a discount for stamps that are valid for multiple days of halibut fishing. Again, this is a common feature among State of Alaska stamps and licenses; however, all of the State of Alaska tiered fees that were analyzed are linked to a specific person and must be purchased by the actual license holder. For daily halibut stamps, linking the stamps to specific persons would present cost and complexity issues that are described below.

The Council motion addresses the administration of the stamp program. It specifies that NMFS will develop regulations to establish the fee requirement, as is required under the new Federal law, and that the agency will also contract with the RQE to develop the fee collection system. This relationship between the RQE and NMFS grew out of research by NMFS to explore the potential for sharing the responsibilities of issuing stamps and collecting fees with the RQE, as there could be distinct advantages to having a single-focus, private non-profit entity manage the program. Section 3 of the analysis provides an overview of the rationale for the contract option. However, as the agency and the RQE moved toward implementation, this strategy has evolved. More details are provided below.

² Charter Halibut Recreational Quota Entity Funding Mechanism; Draft for Council Final Action; North Pacific Fishery Management Council; April 2022. Referred to as "the analysis" in this document.

1.4 Implementation Goals of the Halibut Stamp Program

In 2023, NMFS began a series of scoping sessions with charter operators on the halibut stamp fee collection program. The purpose of the meetings was to review the features of the RQE program, to provide background on the halibut stamp program, and to solicit input from operators on how the stamp program might work under the various business models that exist in the industry. Meetings were held in many of the major centers of charter fishing: Juneau, Ketchikan, Sitka, Gustavus, Craig, Seward, and Homer. NMFS also sought advice from licensing and charter logbook specialists at ADF&G. Within NMFS, the Alaska Region Restricted Access Management (RAM), Information Technology, Sustainable Fisheries, and Operations and Management Divisions will each have a significant role in implementation and have also provided critical input on implementation decisions. Through this process, NMFS developed the recommendations to implement the halibut stamp program detailed in this discussion paper.

Although there are distinct advantages to a daily halibut stamp requirement, the biggest challenge is the volume of transactions and stamp assignments. Based on figures in the analysis, some 500 unique charter businesses that hold nearly 1,000 Charter Halibut Permits (CHPs) will be responsible for obtaining and validating stamps for approximately 200,000 halibut angler days each year. It is estimated that nearly \$4 million in fees may be collected annually from the combined businesses in Areas 2C and 3A. The collections must occur securely, and ultimately the fees must be passed through NMFS and transmitted to the Federal Treasury.

Given the volume of transactions and the wide range of business models in the charter industry, NMFS's goal is to develop a program that is as simple and secure as possible under the circumstances. Among other things, a simple program will be easier to learn, will be less expensive to develop and to maintain, and is more likely to fit different business models. Additionally, and most importantly, NMFS has an obligation under the Paperwork Reduction Act to implement a program that is efficient, effective, and economical, with the least amount of burden on business entities and individual persons. As the agency explored concepts to achieve these goals, two portions of the Council's motion posed challenges: NMFS's potential contract with the RQE to issue the stamps and to collect the fees, and the tiered fees for halibut stamps.

2 NMFS Recommends the eFish Platform and Logbook Validation

2.1 Electronic Stamps Issued and Fees Collected Through eFish

NMFS determined early in its consultation with licensing experts at ADF&G and at NMFS RAM that electronic stamps would be more cost-effective and simpler to develop than traditional paper stamps. In particular, paper stamps have distinct disadvantages in cost, distribution, and accounting. These detriments would be especially difficult for halibut stamps, which are a daily stamp, as opposed to stamps that are valid for an entire year or season (such as for king salmon). After hearing from charter operators, NMFS also concluded that a system where businesses could purchase electronic stamps in advance would work best. If charter operators can purchase stamps at times opportune to them, and in quantities that make sense to them at the time, it would settle most issues of poor internet connectivity and systems breakdowns that could complicate real-time purchases at the start of a fishing trip. Moreover, it would be a more flexible way for businesses to operate if they can "bank" the stamps and use them when needed, rather than attempting to obtain stamps immediately at the time of use. Additionally, electronic stamps do not have to be specific for a particular year; they can be purchased by charter operators and if they are not

used in one year, they can carry over to the next. In that manner, once purchased, the stamps become a business asset, and a post-season reimbursement of purchased stamps is not necessary.

The next consideration was to determine an effective platform for charter operations to obtain electronic stamps, and the manner in which the fees would be securely and efficiently collected and eventually transmitted to the Federal Treasury. Although security of the collected fees is paramount, another concern is that the number of anglers a charter operation serves is considered confidential information by both NMFS and ADF&G. Maintaining this confidentiality became yet one more aspect of the fee collection that NMFS would have to protect. It became apparent that NMFS's online eFish platform would be an appropriate means to create accounts and for charter businesses to purchase the stamps.

A distinct advantage of using eFish is that it currently exists. In this way, there are significant cost advantages in adapting a program that already serves the online business needs of fishing operations in the Alaska Region. For example, eFish is currently used by businesses to obtain and/or renew permits, check accounts for fisheries quota use, submit reports, and pay cost recovery and observer fees. Currently, many charter halibut operations have an eFish account and use it to annually register their CHPs and to submit GAF reports. Perhaps most importantly, eFish provides a secure and efficient means to collect and temporarily hold the fees from stamp purchases.

2.2 Electronic Stamps Validated by ADF&G eLogbooks

If charter businesses can purchase and cache electronic stamps ahead of time on eFish, the next consideration was to develop a means to validate the daily use of stamps. Again, to achieve simplicity and to minimize the burdens and cost of information collections, NMFS recommends using an existing platform for the validation of stamps. The ADF&G saltwater eLogbook is ideally suited for the task, and ADF&G has agreed in concept to collaborate with NMFS and the RQE to pursue this. NMFS believes the validation can occur with relatively simple changes to the saltwater eLogbooks and with minimal effort on the part of charter operators. A key component to maintain the simplicity of this step is that stamps do not have to be tied to individual anglers: the number of validated stamps only has to match the number of anglers on that trip who intend to retain a halibut if they catch one. This would allow a charter guide to simply survey the anglers to determine the number of stamps that are needed for that particular trip, then enter that number into the logbook with an appropriate date and time linked to the entry.

Saltwater logbooks are required for all sport fish charter/guide operations who operate in saltwater. Electronic logbooks have been required in Southeast Alaska (IPHC Area 2C) since 2021. In Southcentral Alaska (IPHC Area 3A) paper and electronic logbooks are currently used interchangeably, but electronic logbooks will become mandatory in 2025. Regulations require charter guides to enter the names and sport fishing license numbers of the charter anglers prior to fishing. This would be a natural point in time where a guide could validate the number of halibut stamps that are needed for that charter trip. After the trip, two other critical pieces of information required on the logbook are the Charter Halibut Permit number and the number of retained halibut.

Among other things, a simple halibut stamp validation on the logbooks provides an on-the-water enforcement component to the fee program. Currently, charter vessel boardings by enforcement officers often include an inspection of the charter logbooks. The presence or absence of validated halibut stamps on the logbooks is an efficient, non-intrusive means to ensure that valid stamps are being used.

NMFS and ADF&G anticipate developing a means to share the data for halibut stamp validation. By regulation, charter logbook data must be submitted in accordance with ADF&G's biweekly submittal schedule. The goal of the agencies is to share the uploaded eLogbook data with NMFS in a timely manner, whereby NMFS can then merge the validated stamp information back to the eFish accounts. At

that point, a charter business would be able to access its account to view records of halibut stamp purchases (e.g. date, time, and number of stamps) that are associated with a CHP, and to also track stamp validations (e.g. date and time of trip, with number of validated stamps). Additionally, eLogbooks have features that allow charter operators to query the history of many of the fields on the logbook. If this capability is applied to halibut stamp validations, then the eLogbooks would be a second source of accounting for operators to track their use of stamps.

In summary, although there may be advantages to NMFS contracting with the RQE to issue stamps and to collect fees, as stated in the Council motion, it is the opinion of NMFS that the most secure, least costly, and expeditious means to collect fees, issue electronic stamps, and validate some 200,000 stamps per year is to use the existing Federal and State of Alaska platforms. The collected fees will reside within the NMFS system, where security of the funds and the confidentiality of fee collections is maintained. The transfer of those funds to the Federal treasury is part of a Federal system that is well-practiced and also secure. Although NMFS's recommendation for the mechanics of how stamps are issued and fees are collected is different than what the Council specified in its motion, NMFS's recommendation achieves the Council's intent in establishing the halibut stamp program.

3.0 NMFS Recommends a Single Fee for Stamps

The April 2022 Council motion calls for a tiered fee approach to issue stamps that are linked to charter halibut anglers. As noted previously, these stamps would be validated for anglers who intend to harvest halibut. The base fee in the tier would be a \$20 stamp that is valid for a single day. The next tiers are a \$40 stamp that is valid for up to three days, and a \$60 stamp that is valid for seven or more days. The rationale for tiered fees appears to be that it is similar to other options for user-fee stamps available through the State of Alaska. However, as indicated above, the State stamps are invariably purchased by individual users, and are directly tied to an individual, whereas halibut stamps would be purchased by charter operators and subsequently assigned to individual anglers.

The Council extensively analyzed fee options, and focused on the amount of revenue that would be raised by varying prices of single-fee stamps. The analysis also compared the effects on revenue for tiered, multiday stamps with varying base rates and discounts. Along with the effects on revenue, the analysis also discussed how tiered fees would interact with the number of days that anglers intend to fish for halibut. Some of the implications of tiered fees may not align with the intent of the discounts. Table 1 illustrates some of these effects.

For example, Table 1 shows that for anglers who intend to fish for one or two days, tiered fees do not provide a discount; that is, a charter operator will pay the same fee under either a single or tiered fees for all 1-day and 2-day anglers (i.e. \$20 for one day, and \$40 for two days). However, for anglers who fish two days, it wouldn't matter if the charter operator applies two 1-day stamps, or a single 3-day stamp - the same \$40 rate would apply. For anglers who intend to harvest halibut on three days, the \$20-\$40-\$60 tiered fee provides charter operators a \$20 discount. However, to cover the halibut fishing needs of a 4-day angler, the charter operator again has two choices: to purchase one 3-day stamp at \$40, then add a \$20 1-day stamp to cover the fourth day (total = \$60), or the operator might choose to just purchase a \$60 7-day stamp. Therefore, under the current \$20-\$40-\$60 fee structure, it is likely that charter operators would purchase and validate 7-day stamps to cover the activities of all persons who intend to retain halibut on four or more days.

Table 1. Comparison of Purchases of the Single \$20 fee vs. Tiered Fees

Days to Fish	Cost Single Fee \$20	Cost Tiered Fee \$20-\$40-\$60	Tiered Fee Purchase Combo	Likely Purchase
1	\$20	\$20	(1d)	\$20 (1d)
2	\$40	\$40	2 (1d)	\$40 (3d)
3	\$60	\$40	1 (3d)	\$40 (3d)
4	\$80	\$60	1 (3d) + 1 (1d)	\$60 (7d)
5	\$100	\$80	1 (3d) + 2 (1d)	\$60 (7d)
6	\$120	\$80	2 (3d)	\$60 (7d)
7	\$140	\$60	(7d)	\$60 (7d)

As mentioned, the effects on revenue of various combinations of tiered vs. single fees was previously reviewed in the Council analysis, and some of the pertinent tables are included in the Appendix of this discussion paper. The analysis provides details and specific caveats for the information on angler participation; in particular, it is difficult to determine “intention” of halibut fishing from logbook data. However, the tables are still the best information available to gauge some of the relative effects on revenue of tiered vs. single fee options. Also of note are the number of persons who would be linked to multi-day tiered fee halibut stamps. Table 3 in the Appendix indicates that relatively few charter anglers pursue halibut for four or more days in a year: in 2019 (the most recent year in the analysis, and most likely to reflect current trends), 13% of the Area 2C anglers and 2% of the anglers in Area 3A are estimated to have fished for halibut for four or more days.

Along with the interactions among the \$20-\$40-\$60 tiers, a more serious consideration arises with tiered fees and the implementation of the stamp program: if tiered fees are to work as intended, the stamps and their respective validation dates would have to be tied to individual anglers over multiple days. The burden to issue appropriate stamps and track their use by individual anglers is likely to be particularly difficult among large operations where guests commonly fish for varying numbers of days and move between boats during their stay, or to accommodate anglers who change their intentions for halibut fishing daily. Compared with a single-fee approach, this added amount of administrative complexity would significantly undermine the goals of a simple, inexpensive fee collection strategy.

Additionally, during the scoping sessions, some charter operators pointed to a lack of equity among fishing businesses if tiered fees were implemented. Operations that cater almost exclusively to one or two-day trips would be responsible for paying fees at the highest level, while other operations that log the same number of angler days, but whose guests tend to fish continuously for three or more days, would be contributing proportionately less to the RQE.

Given the trade-offs of greater complexity, higher costs, information collection burdens, and perceptions of fairness and equity in fee collections, NMFS recommends a single-fee approach to issuing stamps. Although this would be a departure from the fee structure in the Council’s April 2022 motion, the efficiency and equity considerations of a single-fee approach appear to be more consistent with the Council’s overall intent for the halibut stamp program.

Appendix

Table 3. Estimated Revenue from Varying Single-Fee Halibut Stamp Prices in Areas 2C and 3A

Area 2C	Angler Days	\$10	\$15	\$20
2009	74,428	\$744,280	\$1,116,420	\$1,488,560
2010	77,983	\$779,830	\$1,169,745	\$1,559,660
2011	72,934	\$729,340	\$1,094,010	\$1,458,680
2012	75,463	\$754,630	\$1,131,945	\$1,509,260
2013	81,755	\$817,550	\$1,226,325	\$1,635,100
2014	90,413	\$904,130	\$1,356,195	\$1,808,260
2015	94,804	\$948,040	\$1,422,060	\$1,896,080
2016	96,264	\$962,640	\$1,443,960	\$1,925,280
2017	104,281	\$1,042,810	\$1,564,215	\$2,085,620
2018	108,700	\$1,087,000	\$1,630,500	\$2,174,000
2019	106,753	\$1,067,530	\$1,601,295	\$2,135,060
Average	89,434	\$894,344	\$1,341,515	\$1,788,687

Area 3A	Angler Days	\$10	\$15	\$20
2009	110,886	\$1,108,860	\$1,663,290	\$2,217,720
2010	118,431	\$1,184,310	\$1,776,465	\$2,368,620
2011	117,810	\$1,178,100	\$1,767,150	\$2,356,200
2012	117,647	\$1,176,470	\$1,764,705	\$2,352,940
2013	119,078	\$1,190,780	\$1,786,170	\$2,381,560
2014	109,034	\$1,090,340	\$1,635,510	\$2,180,680
2015	104,643	\$1,046,430	\$1,569,645	\$2,092,860
2016	108,766	\$1,087,660	\$1,631,490	\$2,175,320
2017	101,463	\$1,014,630	\$1,521,945	\$2,029,260
2018	101,756	\$1,017,560	\$1,526,340	\$2,035,120
2019	103,591	\$1,035,910	\$1,553,865	\$2,071,820
Average	110,282	\$1,102,823	\$1,654,234	\$2,205,645

Appendix

Table 4. Halibut Days Fished per Individual Charter Angler

Area 2C

Year	Days Fished				Total Anglers
	1	2	3	4+	
2010	42%	15%	23%	20%	31,967
2011	42%	16%	24%	18%	30,458
2012	42%	15%	24%	18%	31,553
2013	43%	13%	24%	20%	33,734
2014	42%	15%	25%	18%	37,721
2015	43%	15%	25%	17%	40,576
2016	44%	15%	25%	16%	41,841
2017	46%	14%	24%	16%	45,914
2018	50%	14%	22%	14%	49,731
2019	51%	14%	22%	13%	49,930
Average	45%	15%	24%	17%	39,343

Area 3A

Year	Days Fished				Total Anglers
	1	2	3	4+	
2010	76%	15%	5%	3%	80,678
2011	76%	16%	5%	3%	79,696
2012	75%	16%	5%	4%	78,456
2013	75%	16%	5%	3%	80,749
2014	75%	16%	5%	3%	74,019
2015	77%	15%	5%	2%	73,820
2016	78%	16%	4%	2%	78,348
2017	78%	16%	4%	2%	73,223
2018	78%	16%	4%	2%	73,847
2019	78%	16%	4%	2%	74,357
Average	77%	16%	5%	3%	76,719

Appendix

Table 5. Comparison of Estimated Revenue: Tiered Price and Single-Price Halibut Stamps

Area 2C

Stamp	Estimated 2019 Sales	Daily discount rate ¹	Price structure based on daily stamp price					
			Price	Revenue	Price	Revenue	Price	Revenue
1-day	25,510	0%	\$10	\$255,100.00	\$15	\$382,650.00	\$20	\$510,200.00
3-day	17,752 ²	33%	\$20.10	\$356,152.00	\$30.15	\$535,222.80	\$40.20	\$713,630.40
7-day	6,668 ³	57%	\$30.10	\$200,706.80	\$45.15	\$301,060.20	\$60.20	\$401,413.60
Total potential revenue⁴				\$812,622.00		\$1,218,933.00		\$1,625,244.00
2019 revenue from non-discounted stamp fee structure⁵				\$1,067,530.00		\$1,601,295.00		\$2,135,060.00
Difference in potential revenue				\$254,908.00		\$382,362.00		\$509,816.00

Area 3A

Stamp	Estimated 2019 Sales	Daily discount rate ¹	Price structure based on daily stamp price					
			Price	Revenue	Price	Revenue	Price	Revenue
1-day	57,878	0%	\$10	\$578,780.00	\$15	\$868,170.00	\$20	\$1,157,560.00
3-day	15,017 ²	33%	\$20.10	\$301,841.70	\$30.15	\$452,762.55	\$40.20	\$603,683.40
7-day	1,462 ³	57%	\$30.10	\$44,006.20	\$45.15	\$66,009.30	\$60.20	\$88,012.40
Total potential revenue⁴				\$924,627.90		\$1,386,941.85		\$1,849,255.80
2019 revenue from non-discounted stamp fee structure⁵				\$1,035,910.00		\$1,553,865.00		\$2,071,820.00
Difference in potential revenue				\$111,282.10		\$166,923.15		\$222,564.20

¹ See Table 3.

² To estimate the number of 3-day stamps sold, it was assumed any angler fishing 2 or 3 days would purchase a 3-day stamp, totals for 2- and 3-day anglers were combined.

³ To estimate the number of 7-day stamps sold, it was assumed any angler fishing 4 or more days would purchase a 7-day stamp.

⁴ This estimate does not include youth anglers

⁵ Table 3 - includes youth anglers