



IPHC Contracting Party Report: United States of America

DATE:

PART I - WEST COAST REGION = 03 JAN 2020

PART II – ALASKA REGION = 10 JAN 2020

CONTRACTING PARTY: UNITED STATES OF AMERICA

AGENCY:

Various, noted within the report

FISHERY SECTORS

ALL

IPHC REGULATORY AREAS

IPHC Regulatory Areas 2A, 2C, 3, and 4 (USA: West Coast and Alaska)

DISCUSSION

Part I, beginning on page 3, presents the IPHC Contracting Party Report for IPHC Regulatory Area 2A (California, Oregon, and Washington).

Part II, beginning on page 45, presents the IPHC Contracting Party Report for IPHC Regulatory Areas 2C, 3, and 4 (Alaska).

RECOMMENDATIONS

That the Commission:

- 1) **NOTE** paper IPHC-2020-AM096-NR02 Rev_1, which presents the Contracting Party Report for the United States of America;
- 2) **NOTE** the catch sharing plans in place for IPHC Regulatory Areas 2A, 2C/3A, and 4CDE.

ATTACHMENTS

Part I (pages 2-42): IPHC Contracting Party Report for IPHC Regulatory Area 2A

Part II (page 43-89): IPHC Contracting Party Report for IPHC Regulatory Areas 2C, 3, and 4

Part I

IPHC Contracting Party Report for IPHC Regulatory Area 2A

DATE: 03 Jan 2020

CONTRACTING PARTY: United States of America

AGENCY:

National Marine Fisheries Service

Frank Lockhart, Senior Policy Advisor

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FISHERY SECTORS

All

IPHC REGULATORY AREAS

IPHC Regulatory Area 2A (United States: Washington, Oregon, California)

DISCUSSION

Since 1988, NMFS has implemented annual Catch Sharing Plans that allocate the IPHC regulatory Area 2A Pacific halibut catch limit between treaty Indian and non-Indian harvesters, and among non-Indian commercial and recreational (sport) fisheries. The Pacific Fishery Management Council (Council) develops Catch Sharing Plans in accordance with the Halibut Act. In 1995, the Council recommended, and NMFS approved and implemented a long-term Area 2A Catch Sharing Plan (60 FR 14651; March 20, 1995). NMFS has been implementing adjustments to the Area 2A Catch Sharing Plan based on Council recommendations each year to address the changing needs of these fisheries.

The 2019 catch limit for Area 2A was 1,500,000 pounds and allocated according to the Catch Sharing Plan as follows:

Treaty Tribes	525,000 (35%)
Non-Tribal Total	975,000 (65%)
Non-Tribal Commercial	299,325
Washington Sport	347,100
Oregon Sport	289,575
California Sport	39,000

Commercial fisheries

There are three commercial fisheries in Area 2A: 1) a directed longline fishery targeting halibut south of Point Chehalis, WA; 2) an incidental catch fishery during the salmon troll fisheries off Washington, Oregon, and California; 3) an incidental catch fishery during the primary sablefish fishery north of Point Chehalis, WA.

Directed fishery targeting halibut

A quota of 254,426 pounds (85% of the non-tribal commercial fishery allocation) was allocated to the directed longline fishery targeting halibut in southern Washington, Oregon, and California. The June 26, July 10 and 24 directed commercial open periods resulted in a catch of approximately 264,000 pounds. IPHC announced closure of the directed fishery on July 31, 2019.

Incidental halibut catch in the salmon troll fishery

A quota of 44,899 pounds of Pacific halibut (15% of the non-tribal commercial fishery allocation) was allocated to the non-tribal commercial salmon troll fishery in Area 2A as incidental catch during salmon troll fisheries.

Halibut retention was permitted in the salmon troll fisheries beginning May 1, with the following ratio: one halibut (minimum 32 inches) per two Chinook salmon landed by a salmon troller, except that one halibut could be landed without meeting the ratio requirement, and no more than 35 halibut could be landed per trip. On July 1, the landing limit was revised to one Pacific halibut per two Chinook salmon, except one Pacific halibut may be possessed or landed without meeting the ratio requirement, and no more than 15 halibut may be possessed or landed per trip. The landing limit was lowered from 15 to four halibut per vessel per trip on July 19, and further reduced on July 27 from four to two halibut per vessel per trip. The fishery is estimated to have taken 43,417 pounds and closed on October 31, 2019.

Incidental halibut catch in the sablefish primary longline fishery north of Point Chehalis, WA

The Catch Sharing Plan provides that incidental halibut retention in the sablefish primary fishery north of Pt. Chehalis, WA, will be allowed when the Washington recreational catch limit is 224,110 (101.7 mt) or greater, provided that a minimum of 10,000 lb (4.5 mt) is available. A quota of 70,000 pounds was allocated to this fishery in 2019. This fishery only occurs off the coast of Washington; more detail is provided in the Washington Department of Fish & Wildlife report (Appendix 1).

Recreational fisheries

675,675 pounds were allocated between sport fisheries in Washington (35.6% of non-tribal share, minus 70,000 pounds allocated to the incidental catch in the sablefish primary fishery), Oregon (29.7% of the non-tribal share), and California (4.0% of the non-tribal share). The allocations were further subdivided as quotas among six geographic subareas. The recreational fishery in Washington is described in Appendix 1. The recreational fishery in Oregon is described in Appendix 2. The recreational fishery in California is described in Appendix 3.

West Coast Enforcement Division

The NOAA Office of Law Enforcement provides marine enforcement and compliance assistance for the west coast of the continental United States, and has ongoing formal Cooperative Enforcement Agreements (CEA) and Joint Enforcement Agreements (JEA) with all three West Coast States: California Department of Fish and Wildlife (CDFW) – Law Enforcement Division, Oregon State Police (OSP) – Fish and Wildlife Division, and Washington Department of Fish and Wildlife (WDFW)– Police. Appendix 4 describes efforts by NOAA’s OLE, and California, Oregon, and Washington enforcement divisions.

Treaty Tribes

The 2019 treaty halibut allocation was 525,000 pounds, of which 497,000 pounds was the commercial Total Allowable Catch (TAC), and 28,000 pounds were set aside for the Ceremonial and Subsistence (C&S) fishery. Thirteen tribes have treaty-reserved rights to Pacific halibut located in the International Pacific Halibut Commission (IPHC) management area 2A: the Coastal Tribes: Hoh, Makah, Quileute, Quinault; and the Puget Sound Tribes: Jamestown S’Klallam, Lower Elwha Klallam, Lummi, Nooksack, Port Gamble S’Klallam, Skokomish, Suquamish, Swinomish, and Tulalip. Appendix 5 summarizes the 2019 tribal halibut season.

REFERENCES

2020 Pacific Halibut Catch Sharing Plan for Area 2A.
<https://www.pcouncil.org/pacific-halibut/background-information/>

APPENDICES

Appendix 1: Washington Department of Fish & Wildlife 2019 Annual Report

Appendix 2: Oregon Department of Fish & Wildlife 2019 Annual Report

Appendix 3: California Department of Fish & Wildlife 2019 Annual Report

Appendix 4: NOAA Fisheries, Office of Law Enforcement, West Coast Division
Report to the International Pacific Halibut Commission, February 2020

Appendix 5: 2019 Treaty Tribes Halibut Summary

APPENDIX 1

WASHINGTON DEPARTMENT OF FISH & WILDLIFE 2019 ANNUAL REPORT

PREPARED BY: WASHINGTON DEPARTMENT OF FISH & WILDLIFE (DECEMBER 20, 2019)

DATE: December 20, 2019

CONTRACTING PARTY:

United States of America

AGENCY:

Washington Department of Fish and Wildlife

CONTACT:

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FISHERY SECTORS:

RECREATION/COMMERCIAL

IPHC REGULATORY AREA:

The Washington and Columbia River portion of IPHC regulatory area 2A (Area 2A).

DISCUSSION

2019 Washington Recreational Fishery Overview

Management Areas

Washington's halibut fisheries are managed under the Pacific Fishery Management Council's (Council) Pacific Halibut Catch Sharing Plan (CSP) for Area 2A. The CSP specifies how the Area 2A total allowable catch (TAC), as defined by IPHC, is allocated or "shared" among various state commercial and recreational sectors. The Washington Department of Fish and Wildlife (WDFW) manages its recreational fisheries by subarea. These subareas (Figure 1) are, Puget Sound (Washington Marine Areas 5 - 10); North Coast (Washington Marine Areas 3 and 4); South Coast (Washington Marine Area 2), and Columbia River (Washington Marine Area 1 to Cape Falcon, Oregon).

Allocation

The Washington recreational fishery receives 35.6 percent of the Area 2A allocation. In 2019, that amount was 277,100 pounds. As specified in PFMC CSP, this amount was further divided amongst the Washington subareas including a 2.3 percent contribution from the Oregon recreational allocation to the Columbia River subarea; allocations to each subarea are shown in Table 1. Note that subarea allocations do not total the Washington recreational allocation because a portion of the Washington recreational

allocation is used to allow incidental halibut retention in the primary sablefish fishery north of Point Chehalis, Washington. More details on this allocation are provided in the commercial fishery section of the report.

Recreational Catch Monitoring

WDFW port samplers meet recreational anglers as they return to the dock where they collect interview information on the number of Pacific halibut retained and released. Samplers also collect length data which is converted to weight using the IPHC conversion chart. Weekly estimates of catch and effort are produced to manage the fishery relative to available allocation. Managers track catch throughout the season and coordinate with IPHC, the National Marine Fisheries Service (NMFS), and other state managers to close when catch is projected to reach the subarea allocation. In 2019, 36 percent of the halibut landed coastwide were sampled for lengths (Table 2).

2019 Summary of Recreational Seasons by Subarea

WDFW worked with stakeholders to construct seasons that provide meaningful recreational fishing opportunity and maximize the season length. Since 2016, season dates have been structured to overlap across subareas as much as possible in order to; provide as much fishing opportunity to each subarea as possible, spread the season out, and keep catch within the Washington recreational allocation.

The 2A allocation was approved in January 2019 and was substantially higher than anticipated when the 2019 season dates were set in the fall of 2018. In addition to a higher than expected allocation, early season catch in the Puget Sound region was hampered by low CPUE and poor weather combined with significantly reduced fishing effort during the month of June. WDFW worked with stakeholders to provide as much fishing opportunity to Washington anglers as possible. Shifting allocation between subareas is allowed through the CSP and provides an opportunity to recognize differences in catch per unit effort in each of the subareas and adjust remaining allocations later in the season to provide some increased opportunity to recreational anglers in all subareas. Unharvested allocation in the Puget Sound region was used to provide additional fishing days in both the Puget Sound subarea and other Washington subareas including the Columbia River. The overall recreational Pacific halibut catch was 272,371 pounds or, 96 percent of the Washington recreational halibut allocation. A brief description of the 2019 season by subarea is provided below. See Table 3 for a complete summary of season and catch in all Washington subareas.

Columbia River Subarea (Washington Marine Area 1 to Cape Falcon, OR)

The Columbia River subarea is co-managed with ODFW and was structured to have similar open days as other Washington subareas as much as possible. The Columbia River season opened May 2 and was structured to be open two days per week, Thursdays and Sundays through May 26. Two additional all depth days were opened on June 20 and June 28. Total catch in the all depth fishery was 17,040 pounds out of the

14,627-pound allocation. 15,316 pounds of the all depth catch was landed into Washington, 1,724 pounds were landed into Oregon.

Five hundred pounds of the Columbia River subarea allocation is reserved to provide for a nearshore fishery that is open three days per week, Monday through Wednesday. Effective June 6, the nearshore fishery was open seven days per week and closed on September 30. Total catch in the nearshore fishery was 219 pounds out of the 500-pound allocation with all of the nearshore catch landed into Washington.

South Coast Subarea (Marine Area 2)

The south coast subarea opened on Thursday, May 2 and was generally structured to be open two days per week, Tuesday and Sunday. The south coast subarea was open a total of nine days and closed on June 29. The total catch was 74,801 pounds out of the 62,896-pound subarea allocation.

North Coast Subarea (Marine Areas 3 and 4)

The north coast subarea opened on Thursday, May 2 and lasted a total of 15 days. The season was structured to be open two days per week (Thursday and Saturday), although the final weekend was open, Thursday, Friday and Saturday. The fishery in this subarea closed on June 29th. The total catch was 141,608 pounds out of the 128,187-pound allocation.

Puget Sound Subarea (Marine Areas 5 – 10)

The Puget Sound subarea opened on Thursday, May 4 and was open a total of 18 days. The season was generally structured to be open two days per week, Thursday and Saturday. The fishery closed on June 29. The total catch was 38,703 pounds out of the 77,550-pound allocation. The remaining allocation was used to offset catch in other subareas resulting from opening additional all depth fishing dates (Table 3).

2019 Washington Commercial Fisheries

Incidental Halibut Retention in the Primary Sablefish Fishery North of Point Chehalis, Washington

The CSP provides for incidental landings of halibut in the primary sablefish fishery, which is open from April 1 until October 31, in the area north of Pt. Chehalis, Washington. The allocation to the primary sablefish fishery comes from the Washington recreational allocation and is only allowed when the 2A TAC is enough to provide meaningful opportunity for both sectors. When the 2A TAC is 1.5 million pounds or more, as it was in 2019, the allocation is 70,000 pounds.

Beginning April 1, the incidental landing limit was 200 pounds of halibut per 1,000 pounds of sablefish limit per landing with up to two additional halibut in excess of the 2 landings ratio allowed per landing (both dressed weight, halibut with head-on). Effective

August 2, the landing limit was changed to 250 pounds dressed weight of halibut for every 1,000 pounds dressed weight of sablefish landed and up to two halibut in excess of the landing ratio.

In 2019, 19 vessels made 88 landings that included 79,360 pounds of halibut in the primary sablefish fishery north of Pt. Chehalis at the conclusion of the fishery, which is 113 percent of the established quota. Incidental halibut landings in the sablefish fishery north of Point Chehalis from 2015-2019 are summarized in Table 4.

Directed Commercial Fishery South of Point Chehalis, Washington

The CSP apportions 85 percent of the 2A commercial allocation to allow for a directed commercial fishery south of Point Chehalis, Washington, which was 254,426 pounds in 2019. The Directed fishery is a small but important fishing opportunity for commercial fishery participants in Washington. In 2019, twenty vessels made 47 landings into Washington ports totaling 86,263 pounds (Table 5). In 2019, total pounds landed into Washington represented 34 percent of the allocation compared to 16 percent in 2014.

Canadian Halibut Landed into Neah Bay

As part of WDFW's port sampling efforts for recreational halibut fisheries, halibut caught in Canadian waters and landed into Neah Bay is also sampled from March through October. A summary of Canadian halibut landed into Neah Bay is provided in Table 6. Effort and landings of Canadian halibut into the port of Neah Bay has been relatively stable in recent years although significantly lower than in 2000 when 2,007 boats with 6,857 anglers reported landing 10,880 Canadian caught halibut.

RECOMMENDATIONS

WDFW worked with stakeholders to evaluate the results of the 2019 Pacific Halibut fisheries in Washington and propose changes to the CSP for 2020 including season dates for recreational fisheries. WDFW supports the Council's recommended changes to the CSP for 2020.

REFERENCES

N/A

APPENDICES – WDFW IPHC Annual Report Tables and Figures

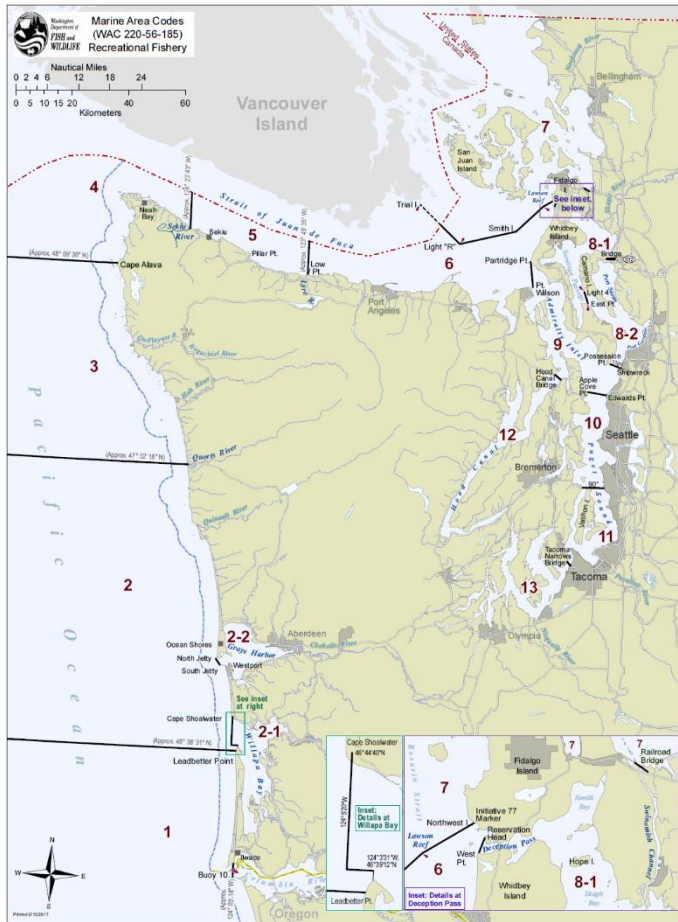


Figure 11. Washington recreational management areas

Table 1. Washington recreational allocations by subarea

Subarea	Allocation (lbs.)
Puget Sound	77,550
North Coast	128,187
South Coast	62,896
Columbia River	15,127

¹ The Washington Administrative Code (WAC) described in the figure has been update to [WAC 220-301-020](#). Please see [Department of Fisheries and Oceans - Pacific Region](#) for details on Canadian management areas and fishery restrictions.

Table 2. 2019 recreational sampling rate by subarea

Subarea	Halibut Landed	Lengths Collected	Sample Rate
Puget Sound	2056	794	39%
North Coast	8,011	2,036	25%
South Coast	4,138	1,445	35%
Columbia River	1,082	869	80%
WA Total	15,287	5,144	34%

Table 3: Washington statewide season summary

Subarea	Open dates	Allocation	Catch	Difference
North Coast	May 2, 4, 9, 11, 18, 24, 26, June 6, 8, 15, 20, 22, 27, 28, 29	128,187	141,608	-13,421
South Coast	May 2, 5, 9, 12, 24, June 6, 20, 28, 29	44,341	54,149	-9,808
	Nearshore: N/A	-	-	-
	South Coast Total	62,896	74,801	-11,905
Puget Sound	May 2, 4, 9, 11, 18, 24, 26, June 6, 8, 13, 15, 20, 22, 27, 28, 29	77,550	38,703	38,847
Columbia River	All-depth: May 2, 5, 9, 12, 24, 26, June 20, 28	14,627	17,040	-2,413
	Nearshore: M-W, May 6 – June 5; 7 days/wk. June 6 – Sep 30	500	219	281
	CR Total	15,127	17,259	-2,694
Washington Total		284,260	272,371	11,390

Table 4. Incidental halibut retention in the primary sablefish fishery north of Point Chehalis, WA

Year	Vessels	Landings	Quota	Catch	% of Quota
2019	19	88	70,000	79,360	113.4
2018	17	72	50,000	43,716	87.4
2017	15	67	70,000	35,866	51.8
2016	16	64	49,686	39,376	79.2
2015	8	37	10,348	9,797	94.7

Table 5. Directed Pacific halibut landings into Washington ports 2015-2019

Year	Net wt. lbs.	Fish Tickets	Vessels
2019	86,263	47	20
2018	61,177	35	15
2017	59,949	43	18
2016	55,055	45	21
2015	33,448	21	12

Table 6. Canadian halibut landings into Neah Bay, Washington, 2015-2019.

Year	# Boats	# Anglers	# Halibut
2019	238	666	403
2018	233	653	343
2017	169	419	245
2016	230	608	304
2015	254	648	434

APPENDIX 2

DATE: 12 DEC 2019

CONTRACTING PARTY: UNITED STATES OF AMERICA

AGENCY:

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FISHERY SECTOR/S

Recreational / Commercial

IPHC REGULATORY AREA/S

IPHC Regulatory Area 2A (USA: Washington, Oregon, California)

DISCUSSION

Topic 1. 2019 Recreational Fisheries in Oregon

Allocation

In 2019, the Oregon recreational Pacific halibut fishery received 20.0 percent of the Area 2A Total Allowable Catch (TAC), or catch limit as indicated in the Pacific Fishery Management Council (PFMC) "Pacific Halibut Catch Sharing Plan" (CSP).

Recreational Catch Monitoring

Catch estimates are derived using data obtained from the Oregon Recreational Boat Survey (ORBS). Catches, by port and boat type (charter or private), were calculated by applying trip level data obtained from dockside sampling (mean anglers per boat, mean fish weight, mean fish per angler, proportion of trips targeting Pacific halibut, proportion of non-targeted trips with incidental catch of Pacific halibut) to total effort counts (boats). Samplers were instructed to measure the lengths of all Pacific halibut from every other boat sampled, for both the private and charter fleets. This information was used to estimate total weight of fish landed. In 2019, statewide, 3,037 Pacific halibut were sampled, which was 35.1 percent of the estimated 8,652 Pacific halibut landed into Oregon (Table 1).

Groundfish Retention and Yelloweye Rockfish Conservation Area Closure

For 2019, retention of all groundfish except other flatfish species, sablefish and Pacific cod was once again prohibited in the Columbia River and Oregon Central Coast all-depth fisheries if Pacific halibut were aboard the vessel, to reduce incidental take of yelloweye rockfish.

Since 2005, the high relief area of Stonewall Bank, located approximately 15 miles off Newport, has been closed to halibut fishing (Figure 2). The intent of this provision is also to reduce the incidental take of yelloweye rockfish.

Columbia River Subarea (Leadbetter Point, Washington to Cape Falcon, Oregon)

The WDFW section of this report has details on the Columbia River Subarea fisheries and the total landings. An estimated 1,723 pounds (10.1 percent of the total subarea catch) were landed into Oregon ports, all from the all-depth season (Table 1). The total Oregon contribution to the subarea catch limit was 6,660 pounds, 2.3 percent of the Oregon recreational allocation.

Oregon Central Coast Subarea (Cape Falcon to Humbug Mountain)

The fishery in this subarea has two components: a shallow nearshore fishery and a directed all-depth fishery (spring and summer seasons).

Nearshore fishery (inside 40 fathoms)

In 2019, the central coast nearshore fishery opened on June 1, with an initial allocation of 32,591 pounds. Total catch was 14,806 pounds, which was 17,785 pounds (54.6 percent) under the original allocation. Ocean and bar conditions and winds hampered fishing for much of the early part of the season. Additionally, the gravel bar approximately 3 miles offshore of the Yaquina Head lighthouse seemed to have been sanded over by winter storms. That area often accounts for 50-70 percent of the total landings from this fishery but was not a productive location in 2019. Once weather calmed down, opportunities for salmon and albacore tuna drew effort away from halibut. These factors are the reason that so much of the allocation was left unharvested.

All-depth fishery

The all-depth fishery, split into spring (May-July) and summer (August-October) seasons, receives 88 percent of the Oregon Central Coast subarea catch limit. In 2019, 71.6 percent of that amount (171,103 pounds) was allocated to the spring fishery and the remainder to the summer fishery (67,898 pounds).

The 2019 spring season was managed in two periods, each with fishing allowed Thursday, Friday and Saturday. As has occurred since 1995, in the first period, fixed open dates were set preseason with the intent to not exceed the spring catch limit. Make-up dates, to be open if poundage remained available following the fixed dates, were also set preseason. In 2019, 15 fixed dates were open: May 9-11; May 16-18; May 23-23; May 30-Jun 1; and June 6-8. During these five openings, two that had low effort and landings due to weather and ocean conditions, two had medium effort and landings, and only one had high effort and landings. After the fixed dates, enough quota remained (65 percent) for nine back-up days (Jun 20-22; July 4-6; and July 18-20). The total catch from the spring season was 89,062 pounds (Table 1), or 53.1 percent of the spring all-depth catch limit. The remaining 82,041 pounds was then available to be shifted to another Oregon fishery inseason.

The 2019 summer fishery was set preseason to open every other Friday and Saturday from August 2 through October 31. Weather and ocean conditions for the first open periods limited effort and landings. Under the Catch Sharing Plan's flexible inseason management provisions, the daily bag limit was increased to two fish per day on Aug 23, and beginning Sept 8 the fishery was opened 3 days per week. These actions were taken to provide additional opportunities to harvest the allocation. Even with those changes, total catch in the summer fishery was 50,742 pounds (Table 1), under the catch limit by 17,156 pounds (25.3 percent). Similar to the nearshore fishery, good salmon and albacore tuna fishing drew anglers away from halibut for much of the summer.

Combined Nearshore and All-Depth Fisheries

The combined catch from the nearshore and all-depth fisheries was 154,610 pounds, or 56.1 percent of the 271,592 pound total allocation for the Oregon Central Coast subarea.

Southern Oregon Subarea

In 2019, the Southern Oregon subarea received 3.91 percent of the Oregon recreational allocation (11,322 pounds). As in previous years, effort and catch picked up in late July when other opportunities began to decrease and the weather and ocean became more favorable. Unlike many previous years, there was some effort or catch in this subarea after Labor Day weekend. Estimated catch in the Southern Oregon subarea was 3,972 pounds, 65 percent (7,350 pounds) under the allocation.

Summary

The combined catch of Pacific halibut in the 2019 Oregon recreational fisheries is estimated at 160,305 pounds. The catch was comprised of an estimated 8,652 fish averaging 18.5 pounds net weight (Table 1). An estimated 15,000 halibut-targeted angler trips contributed \$2.5 million, via spending on trip- and fishing-related expenses such as hotels, lodging, tackle, and other items.

Topic 2. 2019 Commercial Fishery

Oregon-registered vessels with an IPHC license for commercial halibut in Area 2A are shown in Table 7. Approximately 57 percent of those vessels that had directed commercial licenses made deliveries of Pacific halibut in 2019; as did approximately 49 percent of those with incidental troll salmon licenses.

Harvesting and Processing

During the directed fishery, there were approximately 199,000 round weight pounds landed into Oregon at an ex-vessel value of \$1.12 million in 2019 (Table 8). During the incidental to salmon troll fishery, there were 8,405 pounds round weight landed into Oregon, for an ex-vessel value of \$51,000 in 2019. Halibut ex-vessel prices averaged \$5.66 per round weight pound in 2019. There were a total of 148 unique vessels that had shoreside halibut landings in Oregon in 2019. Of the 148 vessels, 57 vessels landed halibut with troll gear (i.e., the incidental salmon fishery), and 74 landed halibut with longline or hook and line gears (i.e., the directed fishery). There were 168 deliveries in the directed fishery and 189 deliveries in the incidental salmon troll fishery (Table 8). Forty nine percent of the vessels in the directed fishery had less than \$10,000 in ex-vessel revenue in 2019, while only four percent had over \$50,000 in ex-vessel revenue. The

average ex-vessel revenue in 2019 was \$15,156, while the median was approximately \$13,800.

Sixteen processors or buyers purchased over \$10,000 of landed halibut each in 2019, and this comprised over 97 percent of all halibut landings in Oregon. The top four processors or buyers purchased about 62 percent of all Oregon halibut landings. Three processors purchased less than \$1,000 of landed halibut each, with one purchasing less than \$100.

RECOMMENDATION/S

ODFW concurs with the Pacific Fishery Management Council's recommendation for three-day fishing periods (0800 day 1 to 1800 day 3, 58 hours) for the Area 2A commercial non-tribal directed Pacific halibut fishery in 2020, beginning the fourth Monday in June.

REFERENCES

None

APPENDICES

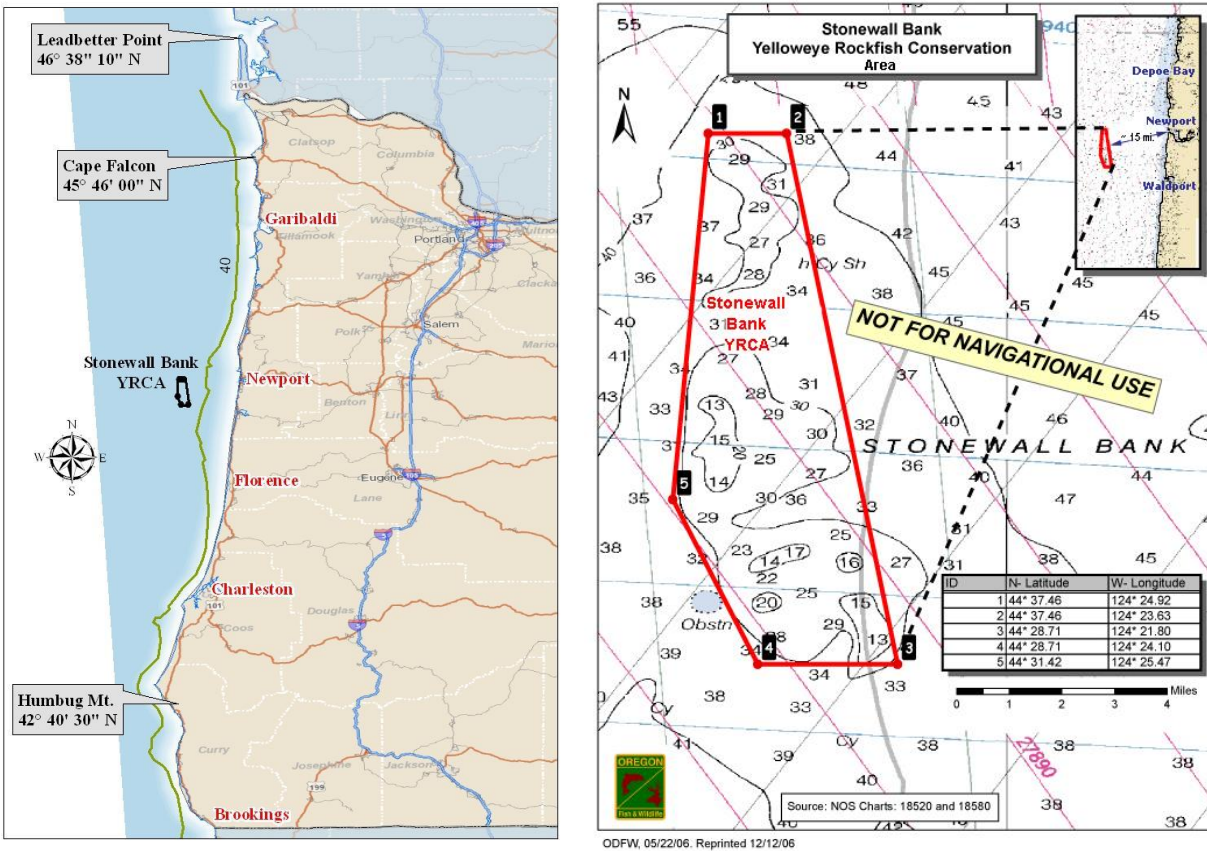


Figure 2. Maps with Oregon Pacific halibut recreational regulation locations, including Stonewall Bank Yelloweye Rockfish Conservation Area.

Table 6. 2019 Oregon Pacific halibut recreational fishery catch data.

Subarea	Season	No. of Halibut Sampled	Average Weight (net lbs.)	No. of Halibut Harvested	Total Pounds (Net Weight)
Columbia River	All-Depth	81	12.6	137	1,723
	Nearshore	0	N/A	0	0
Central Oregon Coast	Spring All-Depth	1,801	17.7	5,026	89,062
	Summer All-Depth	928	18.1	2,802	50,742
	Nearshore	144	29.3	506	14,806
Southern Oregon Subarea		83	21.9	181	3,972
Total		3,037	18.5	8,652	160,305

Table 7. Number of Oregon-registered vessels with an IPHC license for commercial halibut fisheries in Area 2A, 2013-2019

Oregon Registered Vessels	2013	2014	2015	2016	2017	2018	2019
Directed Commercial	88	99	92	109	135	128	130
Incidental Sablefish (N of Pt. Chehalis)	0	2	0	1	1	3	4
Directed and Incidental Sablefish	8	5	5	1	3	6	3
Incidental Troll Salmon	192	239	230	193	116	116	116

Table 8. Summary of Oregon commercial Pacific halibut fisheries information for 2019.

Sector	# of Vessels	# of Deliveries	Pounds Landed	Avg. Ex-Vessel Price per Pound	Total Ex-Vessel Value
Directed fishery (non-tribal)	74	168	198,797	\$5.71	\$1,121,558
Incidental with salmon	57	189	8,405	\$6.17	\$51,847
Total	131	357	207,202	\$5.66	\$1,173,405

APPENDIX 3

2019 California Department of Fish and Wildlife Report to the International Pacific Halibut Commission

The California coastline plays a unique part in Pacific halibut management as it is located at the southern extent of the population range. Fishery participation in California has historically been a minor and irregular contributor to harvest removals compared to other management areas. In 2019, nine vessels successfully participated in the Area 2A Non-Tribal Directed Commercial fishery in Northern California. Landings totaled 10,186 pounds dressed (head on, gutted) and resulted in an estimated \$67,417 in ex-vessel revenue for northern California coastal communities; landings and revenue in 2019 set a record high for the recent fishery in California. California Department of Fish and Wildlife staff were present during the offloading of vessels in Eureka and conducted biological sampling in accordance with the International Pacific Halibut Commission's (IPHC) protocols. Ageing structures and tissue samples for Pacific halibut were collected and provided to the IPHC for inclusion in the stock assessment.

The recreational fishery in California was open May 1 through October 31 for a total of 184 days. Estimated catch in this fishery was 17,440 net pounds, or 44.7 percent of the 39,000 net pound quota. The average estimated weight per fish was 23.8 net pounds, approximately the same average weight as seen in 2018. Catch and effort in the 2019 recreational Pacific halibut fishery off California was anomalously low. Anecdotal information suggests several factors may have contributed to the low catch and effort and include: availability of other targets such as salmon, California halibut inside Humboldt Bay, and albacore in August and September; poor ocean and weather conditions during many of the summer months; and difficulty locating and catching fish on the "halibut grounds."

For more information about California's Pacific halibut fishery, contact:

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APPENDIX 4



NOAA
FISHERIES

Annual Report to the
International Pacific Halibut
Commission

West Coast Enforcement

Division January 2020

**NOAA Fisheries, Office of Law Enforcement, West
Coast Division Report to the INTERNATIONAL PACIFIC**

HALIBUT COMMISSION

January 2020

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West Coast Enforcement Division Overview

Staffing Snapshot

37 Full-Time Employees

- 17 Special Agents
- 6 Enforcement Officers
- 7 Mission Support
- 6 Investigative Support
- 1 Contractor

Annual Budget:

\$8.3 million

Headquarters

7600 Sand Point Way
NE Seattle, WA 98115

Field Offices

Alameda, CA
Astoria, OR
Bellingham,
WA Coos Bay,
OR Lacey, WA

Long Beach,
CA Monterey,
CA Newport,
OR Portland,
OR
Sacramento,
CA San Diego,
CA Santa Rosa,
CA Seattle, WA
Westport, WA

The National Oceanic and Atmospheric Administration (NOAA) Fisheries, Office of Law Enforcement (OLE), West Coast Division (WCD) provides marine enforcement and compliance assistance for the west coast of the continental United States, primarily California, Idaho, Oregon and Washington, but the area of responsibility also includes Arizona, Colorado, Montana, Nevada, North Dakota, South Dakota, Utah, and Wyoming. Our staff includes Special Agents, Enforcement Officers, and support personnel stationed in California, Oregon, and Washington. The states of Washington, Idaho, Montana, and North Dakota include 1,327 miles of international border with Canada and the states of California and Arizona include 513 miles of international border with Mexico. There are 1,293 miles of rigorous Pacific Ocean coastline and 7,863 miles of tidal shoreline, five National Marine Sanctuaries (to include 290 Marine Conservation Areas), the ecologically diverse Puget Sound, 21 major international seaports, 18 international airports, 222,471 square nautical miles of Pacific Ocean within the Exclusive Economic Zone (EEZ), and 339,375 square miles of land encompassing numerous rivers and tributaries feeding into the Pacific Ocean.

The OLE staffing plan recommends the WCD have a staff of 59 support and sworn personnel positioned throughout Washington, Oregon, and California. OLE has prioritized filling vacant positions and is striving to meet the staffing plan within the constraints of the annual budget. The plan divides the staff between three categories: Operational – which includes sworn staff (i.e. Special Agents, Enforcement Officers), Investigative Support – which includes operational support staff (i.e. Investigative Support Technicians), and Mission Support – which includes administrative staff (e.g. information technology and administrative assistants).

During 2019, one new Special Agent reported to our Seattle District Headquarters Office, and an additional five new Special Agents and a new

Enforcement Officer recently reported to our Long Beach, Santa Rosa, and Monterey Field Offices. We plan to fill several additional operational and support positions this year, including two Supervisory Enforcement Officer positions in Oregon and California, two Enforcement Officers focused on Illegal, Unreported, and Unregulated (IUU) fisheries in Washington and California, an Investigative Analyst in Seattle, and a Compliance Liaison Analyst position, which will also be located in Seattle.

The Operational staff has Special Agents (SA) organized in two districts, each with a supervisory Assistant Special Agent-in-Charge (ASAC). District One covers Washington and Oregon, with a recommended staff of seven SA positions (six currently filled). District Two covers California, with a recommended staff of seven SA positions (all currently filled).

The Operational staff also has Enforcement Officers (EO) positioned in two patrol districts – Patrol North, which covers Washington and Oregon, and Patrol South, which covers California. When fully staffed, the plan calls for three patrol districts staffed by twenty EOs, with each district having a Supervisory Enforcement Officer (SEO) assigned. Currently, the SEO positions are vacant, with one Acting SEO and six EO positions filled. We are working closely with Headquarters to fill many of the vacant SEO and EO positions this year and into the future.

Office of Law Enforcement – Enforcement Priorities

The NOAA Office of Law Enforcement released six National Priorities for Fiscal Years 2018-2022. Input from the Council, along with various stakeholders and the public greatly assisted in the development of the Priorities. A full description of OLE Enforcement Priorities is available at this link and the priorities are summarized below: [OLE Enforcement Priorities, Fiscal Years 2018 - 2022](#)

- 1) ***Sustainable Fisheries:*** NOAA Fisheries - in close coordination with the regional fishery management councils and state partners - is responsible for fostering healthy, productive, and sustainable living marine resources and habitats. NOAA Fisheries achieves these outcomes through: effective, transparent management actions supported by strong science; habitat conservation and restoration programs; an ecosystem approach to fisheries management; partner and stakeholder coordination and communication; and effective enforcement.
- 2) ***Protected Resources:*** The Endangered Species Act and the Marine Mammal Protection Act were enacted to help recover species that are facing extinction and to protect marine mammals. NOAA Fisheries is responsible for the conservation and recovery of protected species and their habitats, as mandated by the MMPA and ESA, through specific efforts focused on reducing negative effects of human activities, enforcing regulations against harming marine mammals and endangered species, and developing plans to guide the recovery and conservation of these protected species.
- 3) ***Illegal, Unreported, and Unregulated (IUU) Fishing/International:*** The vast majority of the seafood consumed in the U.S. is imported. This demand for seafood makes the U.S. an attractive market for IUU fish and fish products, and also places pressure on wild stocks from all over the world. Like domestic regional fishery management councils, regional fisheries management organizations (RFMOs) work to ensure that seafood caught within their governing areas is taken in an authorized and sustainable manner. Those who circumvent RFMO conservation and management measures are engaged in IUU fishing. The Seafood Import Monitoring Program, or SIMP, establishes reporting and recordkeeping requirements for imports of certain seafood products, to combat IUU caught and/or misrepresented seafood from entering U.S. commerce. IUU fishing disadvantages legal fishermen globally, including U.S. fishing fleets and coastal communities, and negatively impacts global fish stocks such as salmon and tuna.
- 4) ***Seafood Fraud:*** Seafood fraud - typically in the form of mislabeling or other forms of deceptive misidentification of seafood products with respect to quality, quantity, origin, or species - undermines the economic viability of U.S. and global fisheries, and deceives consumers. Seafood fraud is generally driven by economic motives and can occur at multiple points along the supply chain.
- 5) ***Wildlife Trafficking:*** Illegal wildlife trafficking is a multi-billion-dollar-per-year enterprise that targets some of the most iconic and endangered species on the planet. As economic opportunists, wildlife traffickers are also frequently involved in other illegal activities such as human trafficking, illegal weapons sales, and the illicit drug trade.
- 6) ***Outreach and Education:*** A primary goal of OLE is voluntary compliance by members of the public or regulated industries with marine resource protection laws and implementing regulations. Engaging in outreach and education activities to foster voluntary compliance is the cornerstone of this goal. While conducting patrol efforts, OLE enforcement officers have day-to-day interactions with industry members and the general public, and use these daily opportunities to answer questions and provide information. As part of the Vessel Monitoring System (VMS) program, OLE investigative support technicians routinely answer calls from industry members concerning regulations and make proactive contact with owners of vessels.

Office of Law Enforcement – WCD Cooperative Enforcement Program

Under the Federally-funded NOAA Cooperative Enforcement Program (CEP), OLE has ongoing formal Cooperative Enforcement Agreements (CEA) and Joint Enforcement Agreements (JEA) with all three West Coast States: California Department of Fish and Wildlife (CDFW) – Law Enforcement Division, Oregon State Police (OSP) – Fish and Wildlife Division, and Washington Department of Fish and Wildlife (WDFW) – Police. These agreements extend federal authority for state agencies to enforce specific federal laws and regulations as defined in specifically agreed upon federal priorities within each agreement. Officially affording partner officers, troopers, and wardens with formal federal deputation and specific federal marine law enforcement authority to assist NOAA.

In addition to providing reimbursement for direct federal fisheries enforcement work performed by state officers, wardens, and troopers in support of federal fisheries enforcement priorities, the agreements also provide funding for state administrative overhead and program-related direct purchases of large marine enforcement assets (e.g., boats, vehicles, etc.) as well as small or portable assets (e.g., dry suits, thermal imaging, cameras, etc.), in addition to targeted program meetings, specific training needs, and services (maintenance of equipment and vessels).

Within the framework of each agreement, there are defined marine law enforcement, compliance assistance, and living marine resource management responsibilities under (mutually agreed upon) federal priorities; these typically include both land-based and at-sea services, and may include air services, if available within a state partner agency and if determined to be of added value in support of one or more federal priorities.

Under the 2019 agreement, the performance threshold requires a minimum of 75% be directed toward execution priorities designated by OLE, with the remaining balance being assigned to general enforcement priorities. Execution priorities are formally defined and funding, performance, and reporting requirements are specified. The federal funding for JEA 2019 in the WCD was \$2.633M, up 1.7% from 2018. The overall amount is equitably distributed to our three state partner agencies.

These agreements foster a cooperative environment, producing a viable collaborative approach to federal and state living marine resources enforcement and management. There are consistent ongoing cooperative efforts between WDFW, OSP, CDFW, OLE, and the U.S. Coast Guard (USCG) for the enforcement, preservation, and management of living marine resources. In addition to the states, the USCG is a valuable federal partner, providing premier at-sea and air resources, and willingly supporting state partner and federal operations. WDFW Officers, CDFW Wardens, and OSP Troopers ensure comprehensive protection and compliance through the monitoring of directed and incidental commercial, recreational, and tribal fisheries. This is accomplished by conducting vessel boardings, monitoring off-loads, inspections of processors, wholesalers, dealers, markets, buyers, restaurants, air and sea ports, and cold storage facilities, as well as through follow-up, surveillance, investigations, and collaborative operations. The significant contributions of our West Coast Cooperative Enforcement Program Partners (CDFW, OSP, WDFW), and the USCG, formulate the foundation of our successful coastal living marine resource protection and compliance.



California Department of Fish & Wildlife (CDFW) – Law Enforcement Division

CDFW Pacific halibut land-based enforcement activities include conducting dockside patrols to monitor catch off-loads, including incidental catch, and individual and vessel licenses; activities also include other compliance and verification checks and conducting collaborative enforcement efforts. CDFW at-sea responsibilities include patrolling the Pacific Ocean, conducting operations, joint enforcement, and inspecting at-sea vessels and personnel for licenses, federal permits, logbooks, marine permits and registration, and catch on board, with emphasis on activities within the Exclusive Economic Zone. Most CDFW activities focused on Pacific halibut is isolated to the North Coast of California, from Mendocino County to the Oregon/California border.

2019 CDFW IPHC Enforcement Efforts:

During 2019, CDFW Pacific halibut patrols covered the major ports in Mendocino, Humboldt, and Del Norte Counties, and approximately 15 sport boat launch ramps. CDFW patrolled, contacted, and regularly checked 9 charter boats targeting Pacific halibut between Shelter Cove and Crescent City. Numerous dockside and at-sea contacts were made where Pacific halibut were present. Offshore Pacific halibut patrols were made in combination with salmon and rockfish patrols.

CDFW IPHC Enforcement Statistics		
	2019	2018
Participating CDFW Wardens	11	11
Dockside Personnel Hours	85	110
At-Sea Personnel Hours	13	64
Contacts Made (Total)	399	436
Commercial	20	56
Recreational	379	380
Enforcement Actions		
Warnings	0	25
Citations	1	3

2019 CDFW IPHC Enforcement Highlights:

One recreational citation was issued during 2019 Pacific halibut patrols involving a vessel using multiple lines offshore Eureka. CDFW worked the commercial Pacific halibut derbies with USCG and OLE Enforcement Officers in Eureka and Crescent City harbors. Great compliance was observed during the commercial Pacific halibut derbies and no citations or warnings were issued.



Oregon State Police (OSP) – Fish & Wildlife Division

OSP Pacific halibut land-based enforcement activities include conducting dockside patrols to monitor catch off-loads, including incidental catch, and individual and vessel licenses; activities also include other compliance and verification checks and conducting collaborative enforcement efforts. OSP at-sea responsibilities include patrolling the Pacific Ocean, conducting operations, joint enforcement, and inspecting at-sea vessels and personnel for licenses, federal permits, logbooks, marine permits and registration, and catch on board, with emphasis on activities within the Exclusive Economic Zone.

2019 OSP IPHC Enforcement Efforts:

During 2019, OSP committed thirteen commissioned staff to Pacific halibut enforcement activities, for a total of 434 operational (vessel and personnel) hours. In conjunction with dockside enforcement efforts, at-sea resource hours included long-range and nearshore patrols. Also, in addition to the IPHC enforcement statistics noted below, OSP observed an 87% compliance rate for recreational contacts and a 94% compliance rate for commercial vessels during 2019, as compared to 89% for recreational contacts and 89% for commercial contacts during 2018.

OSP IPHC Enforcement Statistics		
	2019	2018
Participating OSP Troopers	13	23
Dockside Personnel Hours	191	165
At-Sea Personnel Hours	162	183
Contacts Made (Total)	379	912
Commercial	99	53
Recreational	280	859
Enforcement Actions		
Warnings / Citations	18*	40

**1 federal referral*

2019 OSP IPHC Enforcement Highlights:

- While investigating a California commercial salmon boat fishing off Bandon, Senior Trooper Keeler located fish ticket information on a Charleston commercial salmon boat that landed one Chinook and four Halibut to a dealer in Charleston. The information was forwarded to NOAA for further investigation.
- Senior Trooper Herman and Trooper Likens conducted a boat patrol on the opening day of the Columbia River sub-area recreational Pacific halibut season. The Troopers issued two citations to individual anglers from Washington that had each caught and retained a Pacific halibut, and were still angling, but did not have halibut tags. Two Pacific halibut were seized. Two other citations were issued for *Fail to Immediately Validate Harvest Card*, along with additional warnings.
- Senior Trooper Herman and WDFW Officer Dielman conducted a second ocean boat patrol during the Columbia River sub-area recreational Pacific halibut season. Herman



and Dielman issued eight citations for *Fail to Immediately Validate Harvest Card*, three citations for *Unlawful Taking Halibut No Harvest Card*, three criminal citations for *Exceed Daily Limit of Halibut*, and one criminal citation for *Unlawful Possession of Marine Fish*. In total, six Pacific halibut were seized. On one contact, Herman and Dielman contacted a boat that was headed in from the halibut grounds with six people on board. The subjects told the officers they had retained six halibut. A subsequent consent search of the boat revealed a seventh Pacific halibut in a garbage can, an eighth Pacific halibut and yellowtail rockfish in a fish hold, and a partially filleted Pacific halibut in a cooler.



- Senior Trooper Van Meter and Trooper Butler conducted an offshore ocean patrol out of Newport for the recreational all depth Pacific halibut opening weekend. During the first contact, approximately thirteen miles offshore, near the Stonewall Banks Yelloweye Rockfish Conservation Area (YRCA), the Troopers encountered an angler who had a warrant out of Linn County for failure to appear on a DUI charge. The Troopers took the individual into custody for transport on the OSP vessel to shore where a patrol Trooper then took the individual to the Lincoln County Jail. The Troopers returned back to the ocean where they found a boat fishing for Halibut near the Stonewall Banks YRCA. The anglers initially stated they only had a few Petrale flat fish, but when the Troopers inspected their cooler, where a large Lingcod was found. Lingcod is closed outside of the 40 fathom line and the boat was fishing 2.5 miles outside of that line. The angler admitted the fish was caught where they were being contacted and knew about a 40 fathom closure, but said he didn't realize it was in effect. The angler also admitted to having the 30 and 40 fathom lines marked on his plotter. When the angler was asked why he didn't disclose the Lingcod when asked about what fish were on board, he said he didn't know why. The angler was cited for *Possession of Marine Fish Closed Season*. Several other anglers were contacted who were having issues with the ODFW Electronic Licensing System (ELS) and compliance assistance was provided.



- Senior Trooper Herman, Senior Trooper O'Connor, and USCG boarding officer (and future Recruit Trooper) Jace Hughsby contacted a vessel with four anglers on board angling for Pacific halibut within the Cape Falcon Marine Reserve. The subjects had the marine reserve on their plotter but claimed that they thought they were outside of it. Further investigation revealed that one of the subjects had been buying Oregon resident angling licenses but was a Washington resident. Four citations were issued for *Angling within Marine Reserve*, and one citation was issued for *Unlawful Possession of a Falsely Applied for License*.
- Senior Trooper Van Meter responded to a commercial salmon troll boat boarded by USCG Station Yaquina Bay and found possession of too many Pacific halibut for the amount of salmon on board the vessel. Upon contact, the fisherman admitted to catching two Pacific halibut and one Chinook on the first pull. He assumed he would catch another Chinook to meet the ratio allowing for the retention of the second Pacific halibut, but unfortunately, he did not. The extra Pacific halibut was seized and the fisherman was cited for *Exceeding Incidental Halibut/Troll*.
- Senior Trooper Herman and WDFW Officer Dielman conducted an ocean boat patrol during the Columbia River sub-area recreational Pacific halibut season. Herman and Dielman issued six citations for *Fail to Immediately Validate Harvest Card* and issued a citation for *Unlawful Possession of Marine Fish* to an angler who had caught and retained a yellowtail rockfish and was using it as Pacific halibut bait.
- Senior Trooper Van Meter conducted an ocean patrol out of Newport in conjunction with USCG Cutter ORCAS for the first commercial Halibut opener. Two boarding teams were deployed and contacted commercial fishing vessels during the season to ensure fisherman were fishing in the proper areas, careful release of bycatch and undersize Halibut was occurring, as well as determining what species were being retained and license status of persons on board. Once the season closed, USCG boarding officers did numerous vessel safety checks as the boats were headed back to port. The following day, Senior Trooper Van Meter conducted dockside checks at Newport dealers for the Halibut offloads. One captain was warned for exceeding his open access sablefish quota.
- Senior Trooper Farrar was checking commercial Pacific halibut boats in Winchester Bay when he located an individual not in possession of his commercial fishing license. The fisherman said he purchased a license, but could not find it. He was issued a warning for not having his license in possession. The Trooper later checked ODFW's commercial licensing system and confirmed the license was purchased.

- Trooper Ross and Trooper Roberts worked a late evening shift in Charleston the night of a commercial Pacific halibut derby. USCG and NOAA Fisheries OLE forwarded a complaint of one commercial fishing vessel cutting another's longline. After further investigation, it was believed that two boats set their gear too close together and one accidentally ran over the other's line, cutting it with the prop. The vessel with its line cut lost approximately 33 tubs of longline gear when the other side of the line broke while pulling its gear. Well after all the other boats came into port at the end of the derby, the vessel with the lost gear was spotted entering the mouth of the river at a very slow speed with a deckhand at the very back of the boat. The Troopers contacted the vessel when they moored in Charleston. The crew and skipper were very upset and hostile since they lost almost all of their gear and landed very few fish. A consent search of the boat revealed the boat had landed one Pacific halibut, nine black cod, and one very small, fresh Chinook salmon. The Troopers attempted to determine why and how the boat had landed the salmon, but the skipper would not tell the whole story and the deckhands refused to answer questions from the Troopers. It is believed that after losing all their longline gear, they trolled for salmon on the way into port. The skipper and one deckhand were cited and released for *Possession of Undersize Salmon*. The skipper and one deckhand were also cited for *No Individual Commercial Fishing License*. The other deckhand, after being told multiple times that he was detained and not free to leave, left the area prior to receiving a citation. All crewmembers aboard the vessel stated they had an individual commercial fishing license, but did not have the license with them. The ODFW system was down and a records check could not be completed for the subjects, thus they were cited for the offense. A records check later showed none of the subjects were licensed. Additional charges were referred to the DA's office.



Washington Department of Fish & Wildlife (WDFW) – Police

WDFW Pacific halibut land-based enforcement activities include conducting dockside patrols to monitor catch off-loads, including incidental catch, and individual and vessel licenses; activities also include other compliance and verification checks and conducting collaborative enforcement efforts. WDFW at-sea responsibilities include patrolling the Pacific Ocean, conducting operations, joint enforcement, and inspecting at-sea vessels and personnel for licenses, federal permits, logbooks, marine permits and registration, and catch on board, with emphasis on activities within the Exclusive Economic Zone. Pacific halibut is shared among four user groups in Washington State: recreational, directed non-Indian commercial, non-Indian incidental, and Tribal fishermen.

2019 WDFW IPHC Enforcement Efforts:

During 2019, WDFW committed twenty-two commissioned staff to Pacific halibut enforcement activities, for a total of 729 personnel hours. In conjunction with dockside enforcement efforts, at-sea resource hours included mid-range and nearshore patrols. Also, in addition to the IPHC enforcement statistics noted below, WDFW observed an 85% compliance rate for commercial and recreational contacts.

WDFW Police developed a patrol plan for 2019 that provided comprehensive protection throughout the entire year. Pacific halibut operations focused on commercial and recreational fisheries, as well as closed season harvest. The enforcement activity was conducted through emphasis patrols. WDFW looked to sustain past successes through emphasis on the following areas: deploying additional officer presence to the highly participated-in Northern Olympic Peninsula recreational Pacific halibut fishery; investing in increased presence for “off peak” patrol hours and public safety; and conducting joint patrols with OSP, County deputies, USCG personnel, and Border Patrol to increase Pacific halibut patrol relevance and effectiveness within the local and diverse law enforcement communities. As Pacific halibut seasons and habitats overlap with other fisheries, directed Pacific halibut patrols often revealed federal and state violations related to other species.

WDFW IPHC Enforcement Statistics		
	2019	2018
Participating WDFW Officers	22	18
Dockside Personnel Hours	299	110
At-Sea Personnel Hours	430	351
Contacts Made (Total)	752	1,444
Commercial	unk	81
Recreational	unk	1,363
Enforcement Actions		
Warnings / Citations	163	128

2019 WDFW IPHC Enforcement Highlights:

Closed Areas: “C-shaped” Yelloweye Rockfish Conservation Area (YRCA):

- The North Coast of Washington is a popular halibut fishing destination and a focus patrol area. Due to a large “C-shaped” YRCA closure, fishermen are required to steer clear to protect yelloweye rockfish populations. Despite this being a long-standing closure and with today’s advanced mapping technology, there are still significant violations occurring within the closed boundaries.

On one patrol, WDFW SGT Kit Rosenberger, Officer Tierra Wessel, and Officer Morgan Cooney contacted several boats that were fishing well inside the “C-shaped” YRCA. A total of 10 halibut were seized from several vessels unlawfully fishing in this closed area and citations were issued.



Officer Cooney and Officer Wessel with Pacific halibut seized from vessels fishing within the “C-shaped” closure.

Joint State Offshore Halibut Fishery Patrols - Washington South Coast:

- As reported by OSP on page 8 of this report, WDFW Officer Todd Dielman, along with OSP Fish and Wildlife Trooper Dave Herman, conducted a joint state (Washington and Oregon) offshore recreational Pacific halibut patrol. Numerous anglers were found failing to record their Pacific halibut. One vessel contacted was occupied by six anglers and found to be in possession of nine Pacific halibut and one closed-season rockfish. The owner of the boat was cited for the over-limit violation and the illegal Pacific halibut were seized and donated.



WDFW Officer Todd Dielman along with Oregon State Police Fish and Wildlife Trooper Dave Herman on joint state halibut patrol with seized Pacific halibut.

Public Safety Response – Vessel in Distress:

- During a Pacific halibut patrol, WDFW SGT Kit Rosenberger and now-retired Officer Greg Haw were patrolling the closed area to the southwest of LaPush, Washington when they were contacted by the USCG advising of a vessel in distress about 20 miles away. The Coast Guard was unable to respond due to another vessel in distress and requested assistance. An uncomfortable wind chop prevented a quick response, but WDFW Officers were on-scene in about 90 minutes. A three-hour tow back to LaPush finished the day for the officers on the water.



A picture of the disabled vessel towed for three hours back to the safety of the Quileute Marina.

Pacific Salmon Charters Pacific Halibut Case - Resolution:

- In 2017, WDFW investigated a Pacific halibut case involving Pacific Salmon Charters based in Ilwaco, Washington. WDFW Officer Todd Dielman led the investigation that lasted over a year and a half. It finally came to an end for two of the charter boat captains in February 2019 when they were convicted after an eight-day jury trial in a Pacific County courtroom.

Robert Gudgel of Longview was convicted of eight counts of unlawful recreational fishing in the 2nd degree, which are misdemeanor crimes. His brother, David Gudgel of Seaview was convicted of 10 counts of unlawful recreational fishing in the 2nd degree, and one count of waste of wildlife, which is a gross misdemeanor crime.

WDFW Police initiated the 2017 investigation in June after a client and two of his relatives went fishing on the charter boat *WESTWIND*. They told officers that during the tripsome of the smaller halibut they caught were placed in a fish box filled with water that was called a “live box.” Larger halibut were retained during the trip and put in a fish box without water known as the “kill box.” At the end of the day, the boat was over the legal limit of fish for everyone on board. The witnesses testified that David Gudgel and his deckhand went through all of the Pacific halibut on board and threw three dead Pacific halibut overboard in exchange for larger Pacific halibut. They also testified that four additional Pacific halibut were thrown back at the end of the trip that they believed were also dead, to ensure the boat returned to port with only their legal limit. As a result of that information, WDFW Officers conducted a subsequent undercover fishing trip on a different vessel working out of the Pacific Salmon Charter Office. Similar violations were observed during that trip by the undercover officers.



A picture taken of the ‘live box’ used on the Pacific Salmon Charter vessels.

At the conclusion of the undercover fishing trip, officers obtained a search warrant for Pacific Salmon Charters to search for records related to prior Pacific halibut fishing trips. WDFW Police and NOAA OLE executed the warrant, seizing passenger manifests and vessel logs.

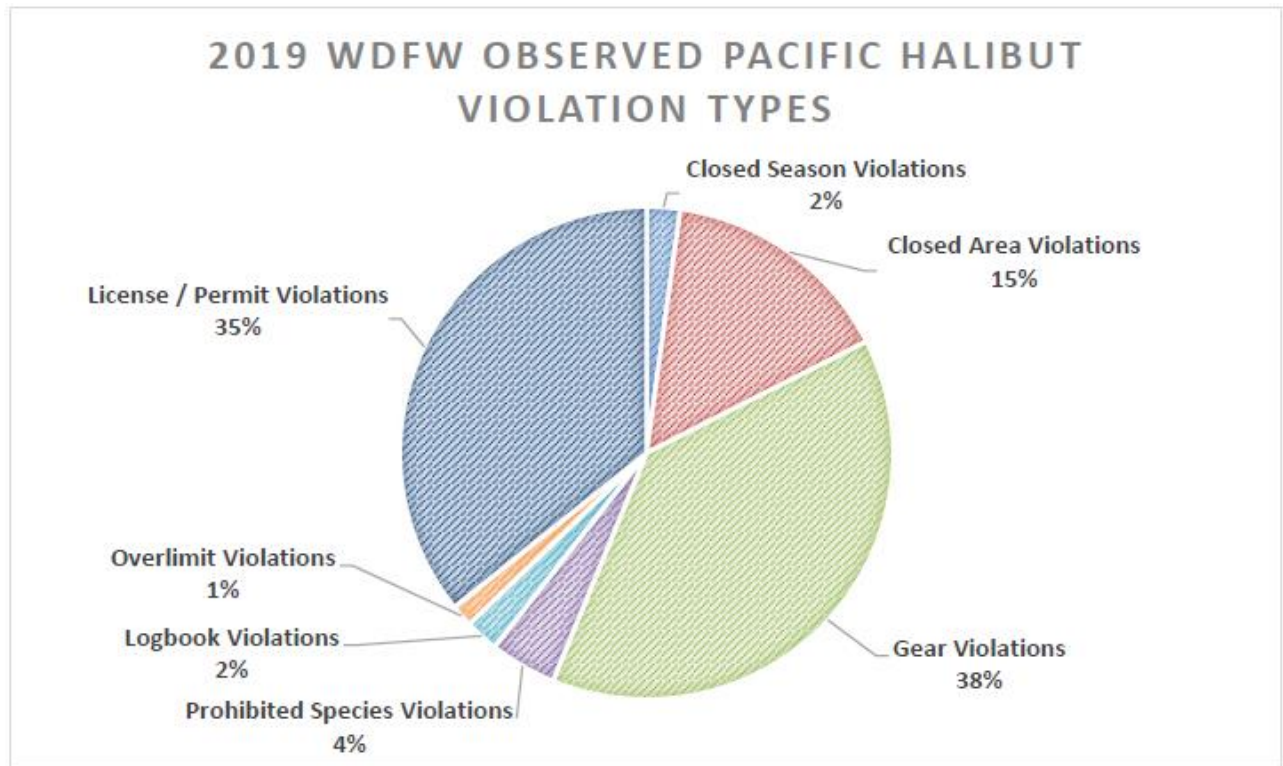
Many written statements were obtained by Officer Dielman who contacted more than 100 passengers. Through those verbal and written statements, many passengers described the same events as the original witnesses. Passengers said some of the Pacific halibut discarded for larger fish were observed swimming off while others were described as slowly sinking, similar to leaves falling from the sky, indicating the fish were dead.

In March 2019, after eight days of trial and a guilty verdict by six jurors, the Pacific County South District Court Judge sent a clear message that abuse of natural resources will not be tolerated, as she handed down stiff sentences to both men. Robert Gudgel received 40 days in jail, \$8,000 dollars in fines, and one year suspension from fishing or being on a vessel. David Gudgel received 55 days in jail, \$15,000 dollars in fines, and a year suspension from fishing or being on a vessel.

The prosecution of this case would not have been possible without the extraordinary efforts put forth by Pacific County Prosecutor Mark McClain and Deputy Prosecutors, Joe Faurholt and Ben Haslam who worked tirelessly on this case. Their diligence ensured this case had a successful outcome. The case also would not have been possible without the 19 witnesses who provided firsthand accounts of the violations. They were the eyes and ears on this case and WDFW thanks them.



WDFW recognizing Pacific County Prosecutors.



NOAA Fisheries Office of Law Enforcement – West Coast Division

2019 OLE IPHC Enforcement Efforts:

During 2019, OLE's West Coast Division (WCD) worked closely with JEA partners and the USCG to monitor activity associated with Pacific halibut fisheries, pursuant to IPHC regulations. As part of an annual enforcement emphasis, OLE-WCD Enforcement Officers, along with JEA partners from WDFW, OSP, and CDFW, conducted patrols and vessel boardings, primarily in support of enforcement efforts associated with the Area 2A Pacific halibut directed commercial fishery. The IPHC established 10-hour fishing periods for Area 2A in the 2019 IPHC Fishery Regulations, adopted by federal regulation under Section 50 of the Code of Federal Regulations (CFR) at 50 CFR §300.62. Each fishing period in the Area 2A directed commercial fishery was set to begin at 8 a.m. and end at 6 p.m. local time. OLE Enforcement Officers focused enforcement activities on the first three fishing days, June 26, July 10, and July 24, 2019. The fishery was restricted to waters south of Point Chehalis, Washington, (46°53.3' North latitude), under regulations promulgated by the National Marine Fisheries Service (NMFS).

The primary focus of OLE enforcement efforts was to ensure commercial fishermen participating in the fishery followed careful release regulations for Pacific halibut, as well as gear requirements outlined in IPHC regulations. OLE's secondary focus was placed on ensuring compliance with commercial derby start and stop times, integrity of closed areas, and monitoring of offloads for compliance with catch retention requirements. In order to achieve the objectives of the mission, a tactical plan was developed to ensure partner agencies from the three Pacific Coast states and the U.S. Coast Guard worked in conjunction with NOAA OLE.

2019 OLE IPHC Enforcement Highlights:

- OLE Enforcement Officers conducted dockside boardings of 44 commercial fishing vessels participating in the fishery. Enforcement Officers teamed up with USCG flight crews to fly 9 missions, monitoring the start and stop times for each fishing period. No violations were noted during the flights. Due to limited availability of Enforcement Officers, no OLE at-sea boardings were conducted. NOAA Enforcement Officers conducted 10 dedicated dockside patrols prior to, during, and after the fishing period. The combination of air and land patrols resulted in 133 personnel hours dedicated to the mission. Enforcement Officers identified several vessels with minor violations, resulting in compliance assistance. Two vessels had improper gear markings and one vessel had a malfunctioning vessel monitoring system. Dockside offload monitoring and boardings resulted in identification of two vessels which caught and retained a total of four undersized Pacific halibut. The owners/operators were issued summary settlement fines and the undersized Pacific halibut were voluntarily abandoned.

- All OLE activity was coordinated with personnel from WDFW, OSP, CDFW, and the USCG:
 - WDFW (see pages 12-18): deployed two patrol vessels in areas known for heavy concentrations of commercial halibut fishing. During operations in conjunction with OLE, a total of six commercial fishing vessels were boarded. Several violations were noted during the boardings. WDFW cited one vessel for no state commercial fishing license and another vessel had a crew member with no commercial fishing license. One commercial halibut vessel was found to be in possession of a yelloweye rockfish and the operator was cited.
 - OSP (see pages 8-12): OSP Fish and Wildlife personnel deployed one patrol vessel in areas known for heavy concentrations of halibut fishing. During operations in conjunction with OLE, OSP Troopers boarded a total of 8 vessels at sea and five vessels dockside. No significant violations were found.
 - CDFW (see pages 6-7): CDFW Wardens began both derby days by flying missions with the USCG on board C-27 fixed wing aircraft based out of Sacramento. During operations in conjunction with OLE, CDFW surface assets boarded a total of three commercial halibut vessels. Fishing effort during Area 2A directed commercial Pacific halibut derbies is historically low in Northern California and 2019 proved to be consistent with past seasons.
 - USCG: USCG personnel were eager to work with OLE to provide a robust enforcement posture to ensure compliance with applicable regulations during Area 2A directed commercial derbies. The USCG provided a fixed wing air asset to patrol the Pacific Coast with a focus on start and stop times for the directed fishery. JEA partners provided subject matter experts to fly with the USCG on these missions in order to serve as observers to confirm if violations were detected. The USCG provided helicopters from two air stations to fly targeted missions in areas of high concentration of commercial Pacific halibut fishing vessels, with a focus on monitoring directed commercial derby start and stop times. OLE Enforcement Officers flew with the USCG on all of these missions

The USCG also provided cutters to patrol areas of high concentrations of fishing activity. Each derby day consisted of a minimum of two cutters and a maximum of three, patrolling from Humboldt Bay, CA, to the northern extent of Area 2A at Point Chehalis, WA. USCG small boat stations also provided boarding personnel and boat patrols throughout Area 2A.

Although USCG patrol efforts resulted in no detected violations, they provided a valuable visible enforcement presence. Numerous commercial fishing vessel operators acknowledged heavy law enforcement presence and some stated they had never seen such oversight of this fishery in years past.

OLE Investigative Support Program:

Investigative Support staff from the West Coast Division (WCD) provided valuable support to IPHC Area 2A enforcement activities. Specifically, WCD's Investigative Support Team provided daily VMS data to aid operational assets with resource allocation and positioning during dedicated enforcement operations; past Pacific halibut fishing activity was analyzed to identify potential areas and regulations requiring additional focus; and vessel monitoring system information and post-derby landing data was monitored to identify potential violations. The WCD Investigative Support team identified thirteen VMS declaration discrepancies occurring during Area 2A directed commercial Pacific halibut fishing periods.

APPENDIX 5

2019 Treaty Tribes Halibut Summary

The 2019 treaty halibut allocation was 525,000 lbs. of which 497,000 lbs. was the commercial Total Allowable Catch (TAC), and 28,000 lbs. were set aside for the Ceremonial and Subsistence (C&S) fishery. Thirteen tribes have treaty-reserved rights to Pacific halibut located in the International Pacific Halibut Commission (IPHC) management area 2A: the Coastal Tribes: Hoh, Makah, Quileute, Quinault; and the Puget Sound Tribes: Jamestown S’Klallam, Lower Elwha Klallam, Lummi, Nooksack, Port Gamble S’Klallam, Skokomish, Suquamish, Swinomish, and Tulalip.

For the 2019 tribal halibut season, the tribes agreed to a revised Memorandum of Understanding (MOU) similar to the 2018 MOU. The MOU maintained the core structure of the 2000 management plan and associated management measures. The fishery structure included an unrestricted fishery without landing limits, a restricted fishery with a 500 lb. per vessel per trip limit, and a late season/mop up fishery. The 2019 MOU enabled each tribe to prosecute their unrestricted and restricted fishery in any order with a 48-hour catch accounting period between each fishery. The 2019 MOU also permitted a second restricted fishery to occur if the initial restricted fishery did not harvest 19% of the TAC. The number of hours for each fishery, codified in the MOU, were based on a fishery model developed by Point No Point Treaty Council staff.

In the unrestricted fishery, a tribe could harvest halibut for 55 hours at a time of their choosing; this allowed tribes to avoid dates of non-treaty fishing and having to negotiate weather criteria. During the restricted fishery, a tribe could harvest halibut for 84 hours with a 500 lb. per landing per vessel limit. The unrestricted and restricted fisheries took place between March 15th (the international opening date) and May 15th. The total unrestricted catch was 374,801 lbs. over 185 landings. This resulted in an unrestricted weight-per-unit-effort of 39.81 lbs./vessel/hour. The total restricted catch was 49,456 lbs. over 207 landings constituting approximately 52.4% of the restricted TAC, or 10% of the total TAC.

Inseason the tribes agreed to a second restricted opener. In the second restricted fishery, a tribe could harvest halibut for 72 hours with a 500 lb. per landing per vessel limit with a maximum of three landings (1,500 lbs. total). The second restricted fishery harvested 68,199 lbs. over 148 landings and took place between May 20th and June 5th. The tribes held a conference call on June 11th to discuss a late season/mop-up fishery. There were relatively few pounds left in the TAC, so the tribes agreed to individual tribal shares of approximately 327 lbs. Each tribe could harvest or donate those pounds to Lummi or Port Gamble for their respective Canoe Journeys between June 11th and July 24th. The tribes harvested 2,112 lbs. over four landings in this fishery.

The 2019 tribal halibut commercial season closed to all parties on July 25, 2019. The total tribal commercial halibut catch in 2019 was 494,568 dressed lbs. which was 0.5% under the allocation. The C&S halibut fishery continued until December 31, 2019.

Part II
IPHC Contracting Party Report for IPHC Regulatory Areas 2C, 3, and 4

DATE: 10 January 2020

CONTRACTING PARTY: United States of America

AGENCY:

National Marine Fisheries Service
Glenn Merrill, Senior Policy Advisor
Glenn.Merrill@noaa.gov

FISHERY SECTORS

All

IPHC REGULATORY AREAS

Regulatory Areas 2C, 3, and 4 (USA: Alaska)

DISCUSSION

Section 1: Charter Halibut Fisheries

Harvest under 2019 Annual Management Measures in Areas 2C and 3A

The Area 2C and 3A Halibut Catch Sharing Plan was implemented in 2014, and is the method for determining allowable levels of charter halibut harvests in those areas. The Catch Sharing Plan also endorses a process through which the North Pacific Fishery Management Council (Council) recommends annual management measures to the IPHC that are likely to limit charter harvests to their annual catch limits.

In Area 2C, the 2019 charter catch limit was 820,000 pounds (lb), and the fishery was managed under a daily bag limit of one fish that had to be 38 inches or less or greater than 80 inches total length. The preliminary 2019 charter halibut harvest estimate of 667,000 lb is 18.7 percent below the catch limit.

In Area 3A, the 2019 charter catch limit was 1,890,000 lb, and the fishery was managed under a two-fish daily bag limit, with a maximum size limit of 28 inches total length on one fish, a Wednesday closure for the entire season as well as five Tuesday closures in July and August, a 4-fish annual limit, a one-trip per day per charter vessel limit, and a one-trip per day per charter halibut permit limit. A prohibition on halibut harvest by skipper and crew during charter vessel fishing trips was effective in both management areas. The preliminary 2019 charter halibut harvest estimate of 2,019,000 lb indicates that harvest exceeded the catch limit by approximately 6.8 percent.

In December 2019, the Council recommended charter management measures for the 2020 fishery.

Guided Angler Fish Program- 2019 Summary

In 2014, NMFS implemented the guided angler fish (GAF) program to authorize limited annual transfers of commercial halibut IFQ as GAF to qualified charter halibut permit holders for harvest by charter vessel anglers in Areas 2C and 3A. The GAF program allows qualified charter halibut permit holders to offer charter vessel anglers the opportunity to retain halibut up to the limit for unguided anglers when the charter management measure in place limits charter vessel anglers to a more restrictive harvest limit. In 2019, by using GAF, charter vessel anglers in Area 2C and Area 3A could harvest up to two halibut of any size per day, and GAF were not subject to the annual limit or daily closures in Area 3A. Table 1 summarizes IFQ to GAF transfers for 2014 through 2019. In 2019, approximately 97,680 lb of Area 2C IFQ was transferred as GAF and 75,039 lb was harvested in the charter fishery. In Area 2C, the pounds of IFQ harvested as GAF has increased significantly in each year since 2015. In 2019, approximately 13,500 lb of Area 3A IFQ was transferred as GAF and 10,600 lb was harvested in the charter fishery.

Table 1. Summary of IFQ to GAF transfers

Year	IPHC Regulatory Area	Number of Transfers (GAF Permits Issued)	IFQ Pounds Transferred	Number of GAF Transferred	Number of GAF Harvested (% of amount transferred)
2014	2C	92	29,498	1,117	800 (72%)
	3A	19	11,654	910	269 (30%)
	Total	111	41,152	2,027	1,069 (53%)
2015	2C	119	36,934	548	428 (78%)
	3A	25	10,337	269	143 (53%)
	Total	144	47,271	817	571 (70%)
2016	2C	132	47,064	723	529 (73%)
	3A	26	10,442	289	220 (76%)
	Total	158	57,506	1,012	749 (74%)
2017	2C	207	53,206	719	576 (80%)
	3A	22	9,786	233	157 (67%)
	Total	229	62,992	952	733 (77%)
2018	2C	332	80,656	1,222	972 (80%)
	3A	31	12,760	304	215 (71%)
	Total	363	93,416	1,526	1,187 (78%)
2019	2C	341	97,680	1,601	1,237 (77%)
	3A	29	13,524	338	266 (79%)
	Total	370	111,204	1,939	1,503 (78%)

Regulatory amendment to align the management measures for guided and unguided halibut anglers on charter vessels

In 2019, NMFS implemented halibut sport fishing regulations that apply to circumstances where both guided and unguided fishing occurs at the same time from a charter vessel. In these cases, the daily bag limits, possession limits, size restrictions, and carcass retention requirements for guided fishing also apply to unguided fishing. The regulations are intended to aid enforcement and ensure the proper accounting of halibut taken when sport fishing in Areas 2C and 3A.

Regulatory amendment to establish an annual registration requirement for Charter Halibut Permits

NMFS regulations that became effective in December, 2019 now require Charter Halibut Permits (CHPs) to be registered annually before use. The annual registration of CHPs is intended to improve the enforcement of CHP transfer limitations and ownership caps, as well as provide additional information to NMFS and the NPFMC on changes in CHP ownership, leasing, and participation.

Section 2: Commercial Groundfish Fisheries

Halibut Bycatch

Current Halibut Bycatch Amounts and Management

Halibut bycatch mortality in the Bering Sea and Aleutian Islands (BSAI) and Gulf of Alaska (GOA) groundfish fisheries is highly regulated and closely managed by the Council and NMFS through the Fishery Management Plans (FMPs) for each management area. Through regulations implementing the FMPs, NMFS manages halibut bycatch by (1) establishing annual halibut prohibited species catch (PSC) limits, (2) apportioning PSC limits to fishery categories and seasons to accommodate halibut PSC needs in specific groundfish fisheries, and (3) managing groundfish fisheries to prevent PSC from exceeding the established limits.

The FMPs specify that halibut bycatch in groundfish fisheries is managed as PSC. Catch of PSC species must be avoided while fishing for groundfish and PSC species may not be retained unless required under the FMP. Halibut PSC limits are an apportioned, non-retainable amount of halibut provided to a groundfish fishery to provide an upper limit on the bycatch of halibut in a fishery. **When a halibut PSC limit is reached in an area, further fishing with specific types of gear or modes of operation is prohibited by those types of operations taking halibut PSC in that area.**

Although halibut PSC is taken by vessels using all types of gear (trawl, hook-and-line, pot, and jig gear), halibut PSC primarily occurs in the trawl and hook-and-line (non-trawl) groundfish fisheries. The Council and NMFS annually establish halibut PSC limits for vessels in the trawl and non-trawl groundfish fisheries in the BSAI and GOA. NMFS manages groundfish fisheries to ensure these limits are not exceeded.

The established halibut PSC limits and total estimated halibut PSC use for 2019 are shown in Tables 2 and 3.

Table 2. 2019 BSAI halibut PSC limits and estimated halibut PSC use

BSAI Fishery	Halibut PSC Limit metric tons (mt)	Halibut PSC Use (mt)	Remaining PSC limit (mt and %)
Trawl (Amendment 80 and BSAI Trawl Limited Access)	2,490	2,078	412 (17%)
Non-trawl	710	79	631 (89%)
Community Development Quota (trawl and non-trawl)	315	189	126 (40%)
TOTAL	3,515	2,346	1,169 (33%)

Table 3. 2019 GOA halibut PSC limits and estimated halibut PSC use

GOA Fishery	Halibut PSC Limit (mt)	Halibut PSC Use (mt)	Remaining PSC limit (mt and %)
Trawl	1,706	1,101	605 mt (35%)
Non-trawl	257	73	184 mt (72%)
TOTAL	1,963	1,174	789 mt (40%)

As shown in Figures 1-3 below, halibut PSC use has not exceeded established limits in the trawl or non-trawl fisheries in the BSAI or GOA in recent years.

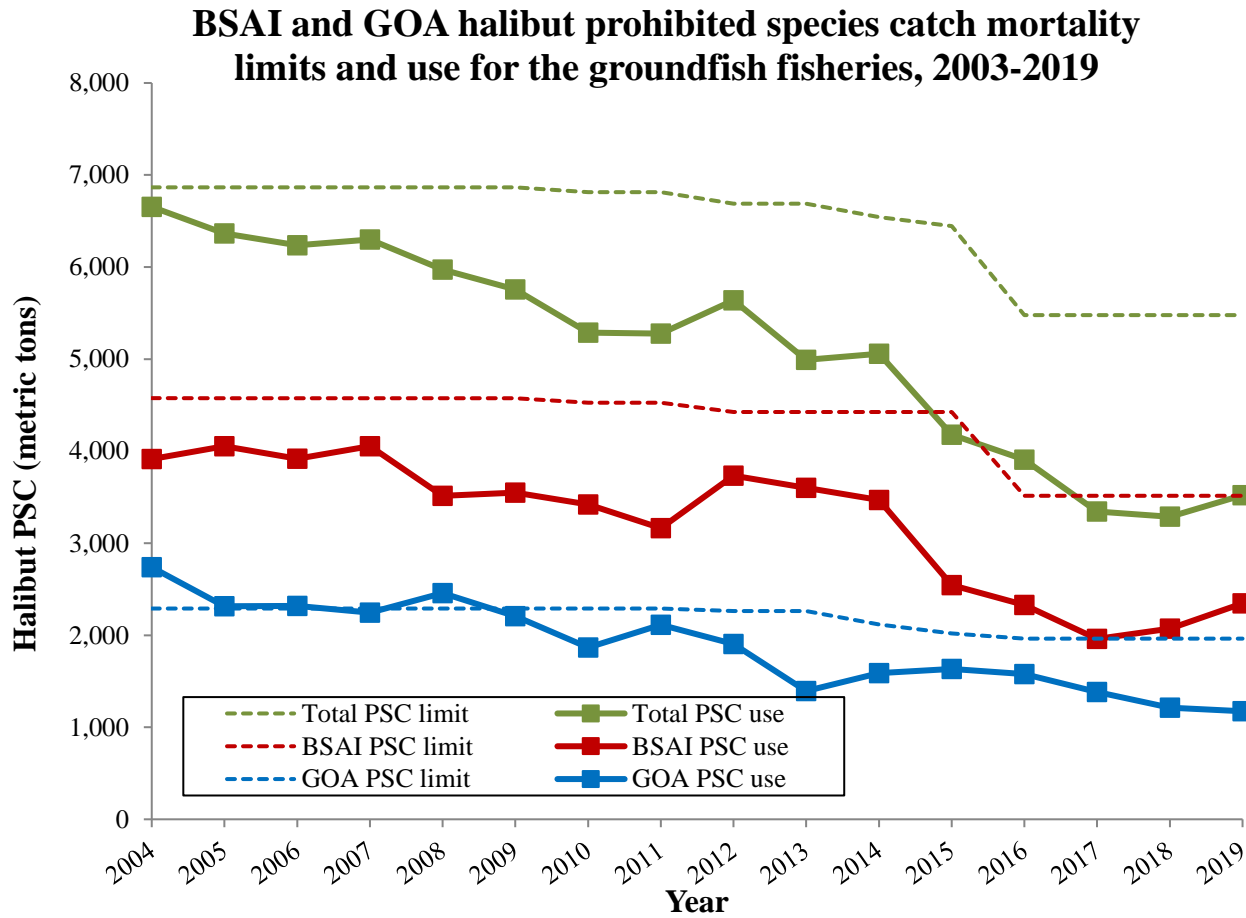


Figure 1. Total BSAI (including CDQ and deck sorting exempted fishing permit for 2016 - 2019) and GOA halibut prohibited species catch limits and use for all groundfish fisheries, 2004 through 2019.

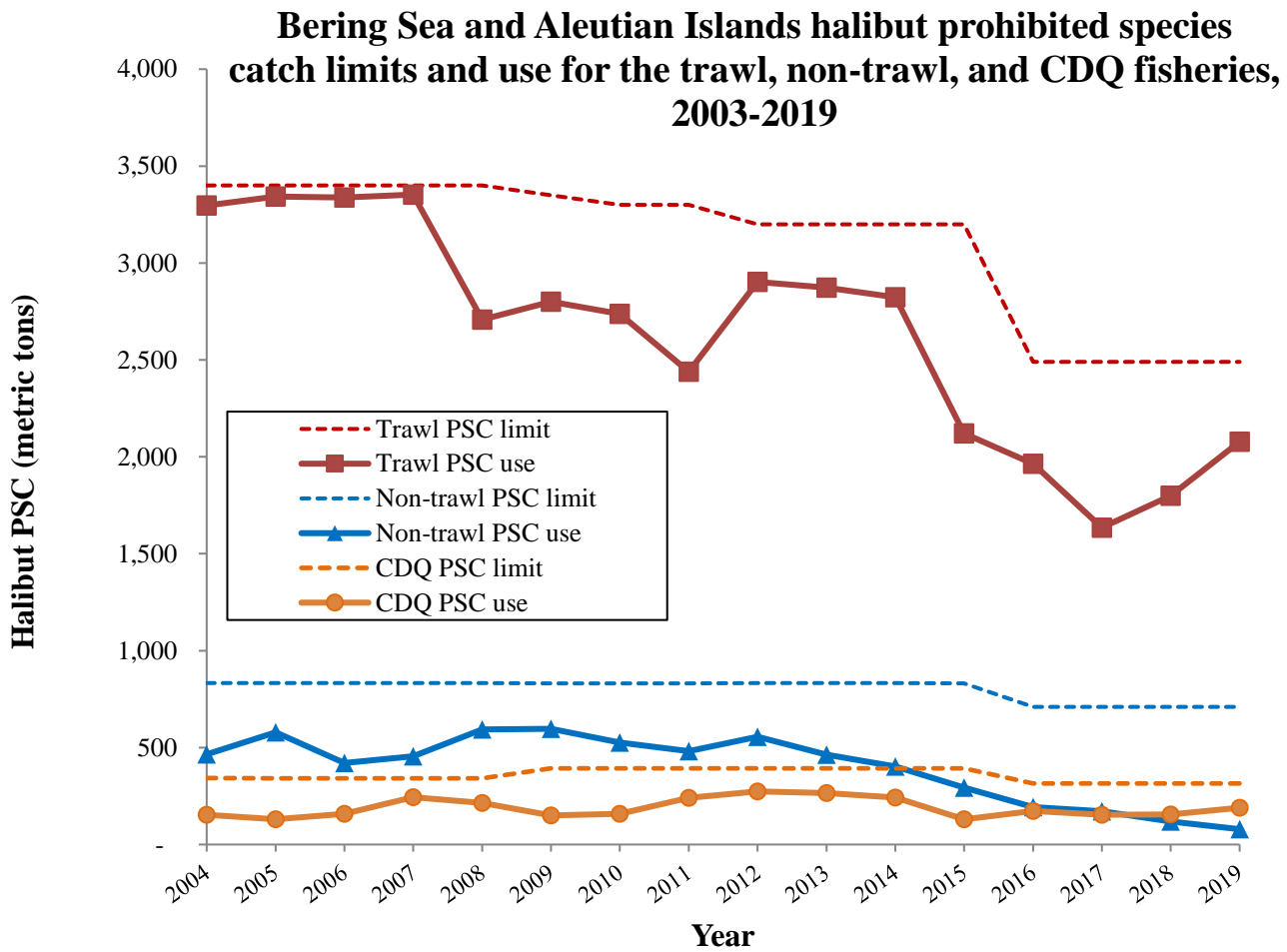


Figure 2. BSAI halibut prohibited species catch limits and use for the trawl (including deck sorting exempted fishing permit for 2016 - 2019), non-trawl, and CDQ groundfish fisheries, 2004 through 2019.

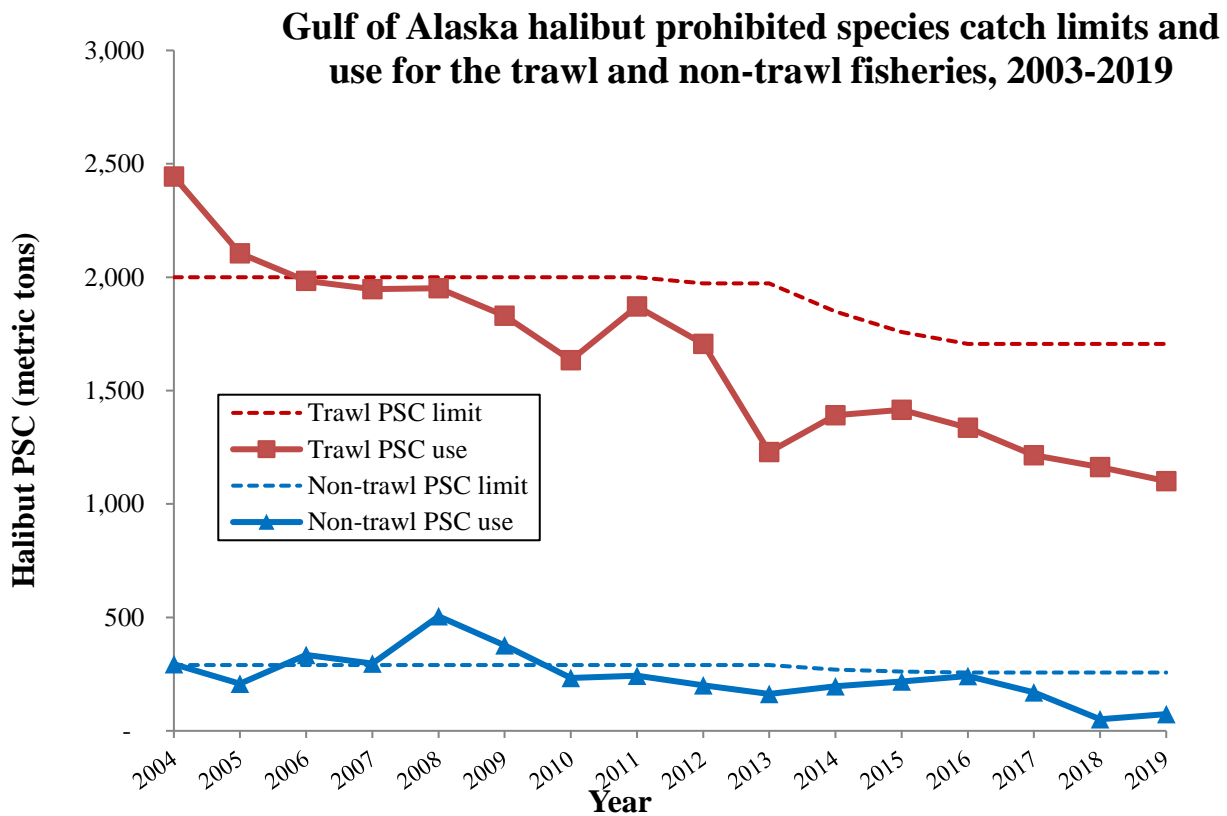


Figure 3. GOA halibut prohibited species catch limits and use for the trawl and non-trawl groundfish fisheries, 2004 through 2019.

2019 Halibut PSC Estimates

The 2019 halibut PSC estimates were developed using a method to spatially account for PSC. This is the same method developed in 2015 by NMFS in consultation with the IPHC. NMFS submitted preliminary 2019 PSC data to the IPHC for its halibut stock assessment in October 2019. NMFS provided final revised estimates to the IPHC in early January 2020 and are incorporated into Appendix 1 of this document.

Halibut Bycatch Management Actions in Progress

This report covers actions that are under development by NMFS. Please refer to the Council’s management letter for actions under development by the Council.

Exempted fishing permits (EFP) to reduce halibut mortality

EFP for 2018 and 2019

NMFS issued an EFP to the Alaska Seafood Cooperative (AKSC) to permit deck sorting of halibut PSC on non-pelagic trawl catcher/processor vessels fishing for flatfish in the BSAI and the GOA on

December 20, 2017 (with modifications on 12/26/18 and 11/6/19). Twenty-two vessels participated in this EFP in 2019. The EFP is effective until December 31, 2019.

Regulatory amendment to authorize halibut deck sorting

The data collected during EFP fishing shows that the practice of deck sorting halibut can improve the viability and therefore lower the total halibut mortality estimate of the halibut encountered by the vessel. This reduction in halibut mortality benefits the trawl fleet by reducing the amount of halibut that accrues toward PSC limits. Halibut deck sorting may also benefit the directed halibut fishery by returning halibut to the water in better condition thus reducing mortality of discarded halibut and potentially increasing halibut biomass.

NMFS published a proposed rule to implement halibut deck sorting monitoring requirements on non-pollock trawl catcher/processors and motherships on April 16, 2019. The comment period closed on May 16, 2019. NMFS published the final rule on October 15, 2019 (84 FR 55044) with an effective date of November 14, 2019. A correction to this rule published December 9, 2019 (84 FR 67183).

Observer Fee Increases

In October 2019, the Council approved an increase to the observer fee that supports the deployment of observers and electronic monitoring (EM) systems in the commercial groundfish and Pacific halibut fisheries under partial coverage monitoring throughout the Gulf of Alaska and Bering Sea Aleutian Islands. The Council adopted a fee increase from the current 1.25% to 1.65%. Under the fastest implementation scenario, the change would go into effect in 2021, and the revenue would be available to affect coverage rates in mid-2022.

The Council heard extensive public testimony about controlling costs in the partial coverage observer program, and before taking action on the fee increase, passed a motion to set cost efficiency as its highest priority for work on the partial coverage observer program. The Council prioritized several immediate efforts to consider how to potentially lower costs and yet increase coverage rates for monitoring, by developing the pelagic trawl EM program, integrating EM and observer data for fixed gear, and optimizing the size and composition of fixed gear observed and EM fleets (including moving some vessels in remote ports, harvesting small amounts of fish, to zero-coverage).

Ultimately, the Council decided that because observer program data, scientifically collected, is foundational to the Council's management program, both additional revenue and mechanisms to reduce costs would be required to address projected revenue shortfalls identified in the analysis. The Council selected an amount that would improve the stability of the partial coverage observer program, increase the fee in an equitable way across sectors, and along with cost containment measures that have been initiated, ensure the Council's monitoring objectives can continue to be met.

Section 3: Commercial Halibut IFQ Program

BSAI Halibut in Pots

In October 2018, the Council took final action to allow retention of legal-size halibut in pot gear used to fish sablefish and halibut in the commercial halibut and sablefish IFQ and Community Development Quota (CDQ) fisheries in the BSAI.

In the analysis, NMFS expressed concern about the potential impact of this action to increase the use of pot gear that could increase the bycatch of Pribilof Island Blue King Crab (PIBKC) and other species of concern. The proposed action could impact PIBKC if fishing with pot gear increased in the Pribilof Island Habitat Conservation Zone (PIHCZ) or in the larger, surrounding stock boundary area. As part of this action, NMFS recommends closing the PIHCZ to all pot gear in addition to establishing inseason management authority to the halibut fisheries in the event there is a conservation concern with PIBKC. This action would give NMFS the authority to close halibut IFQ fishing in both the GOA and BSAI if an overfishing limit is approached for groundfish or shellfish that is consistent with regulations in place for groundfish.

On October 3, 2019, NMFS published a proposed rule to authorize the retention of halibut in pot gear in the BSAI. The final rule published January 8, 2020.

IFQ Medical and Beneficiary Transfer Provisions

In April 2019, the Council took final action to modify the medical and beneficiary transfer provisions of the Individual Fishing Quota (IFQ) Program for the fixed-gear commercial Pacific halibut and sablefish fisheries.

NMFS published the proposed rule on October 24, 2019 with public comments invited through November 25, 2019. This action is intended to simplify administration of the medical and beneficiary transfer provisions while promoting the long-standing objective of maintaining an owner-operated IFQ fishery. NMFS expects to publish a final rule in early 2020.

CQE Fish-Up in Area 3A

In June 2019, the Council took final action to allow category D halibut Individual Fishing Quota (IFQ) held by an Area 3A (Southcentral Alaska) Community Quota Entity (CQE) to be harvested on category C vessels from August 15 to the end of the IFQ fishing season. Modifying the regulations to allow D-category IFQ to be harvested on larger C-category vessels near the end of the IFQ season would provide more flexibility to CQE participants to fully harvest category D IFQ in Area 3A. NMFS expects to publish a proposed rule in early 2020.

Section 4. Comments on IPHC Reg Proposals

IPHC Prop A3 IPHC Fishery Regulations: minor amendments

This would reorder IPHC regulations and make other edits for clarity and emphasis. US Federal regulations at 50 CFR § 300.63(d) *Fishery Election in Area 2A* include multiple references to IPHC regulation sections 8, 24, and 26. Other areas of US Federal regulations more broadly reference the entire Commission regulation published annually in the **Federal Register** and would not be affected by the proposed reordering. Commission regulation sections 8 and 26 are proposed to be reordered to section 12 and 25, respectively. If this proposal were adopted, NMFS would need to revise US Federal regulations at § 300.63(d) to correctly reference the Commission regulations.

IPHC Prop A4 IPHC Fishery Regulations: minor amendments

This proposal is consistent with other provisions of the halibut and sablefish IFQ program recently implemented with the integration of Electronic Monitoring into the North Pacific Observer Program.

APPENDICES

Appendix 1. 2018 and 2019 Halibut PSC Use by IPHC area and Gear type in the BSAI and GOA

Appendix 2. NOAA Fisheries Office of Law Enforcement 2019 Annual Report

Appendix 3. United States Coast Guard District 17 2019 Annual Report

Appendix 4. Alaska Department of Fish and Game Halibut Subsistence and Charter Halibut Management Measures Reports

APPENDIX 1. 2018 and 2019 Halibut PSC Use by IPHC area and Gear type in the BSAI and GOA

Table 1. 2018 and 2019 Halibut PSC Use in the Gulf of Alaska and the Bering Sea and Aleutian Islands by gear type and IPHC Management Area (rounded to the nearest metric ton).

2018 Total		2019 (Predicted 10/22)	2019 Actual	Difference (Actual – Predicted)
Area 2C				
Hook-and-line (non-sablefish)	3	3	2	-1
Hook-and-Line (sablefish)	24	30	33	3
Pot	0	0	0	0
Total	27	35	35	0
Area 3A				
Trawl	906	820	894	74
Hook-and-line (non-sablefish)	37	27	49	22
Hook-and-Line (sablefish)	43	14	32	18
Pot	1	0	0	0
Total	986	862	976	114
Area 3B				
Trawl	251	174	197	23
Hook-and-line (non-sablefish)	8	7	9	2
Hook-and-Line (sablefish)	9	56	44	-12
Pot	1	1	1	0
Total	269	238	252	14

Table 1 includes estimates of halibut mortality from groundfish fisheries managed by the State of Alaska, and halibut mortality attributable to the 2018/2019 deck sorting EFP catch (in Areas 4A, 4CDE, and 4 Closed Area). Table 1 estimates the amount of halibut mortality by each gear type using a method of apportioning by IPHC area. Catch Accounting estimates through December 23, 2019 are subject to revision as new observer information is used in estimation, and existing observer information is debriefed.

Slight discrepancies may exist between Table 1 and Table 2 due to the incorporation of State of Alaska GHL fishery data in Table 1, and other minor rounding errors. Table 1 provides the most complete assessment of halibut mortality.

2018 Total		2019 (Predicted 10/22)	2019 Actual	Difference (Actual - Predicted)
Area 4A				
Trawl	164	157	169	12
Hook-and-line (non-sablefish)	17	20	18	2
Hook-and-Line (sablefish)	1	4	4	0
Pot	1	1	2	1
Total	183	182	193	11
Area 4B				
Trawl	76	92	83	-9
Hook-and-line (non-sablefish)	7	7	7	0
Hook-and-Line (sablefish)	0	0	0	0
Pot	1	1	1	0
Total	83	100	91	-9
Area 4 CDE				
Trawl	973	1,144	1,087	-57
Hook-and-line (non-sablefish)	67	56	54	-2
Hook-and-Line (sablefish)	0	0	0	0
Pot	0	0	0	0
Total	1,040	1,200	1,141	-59
Area 4 Closed				
Trawl	736	916	934	18
Hook-and-line (non-sablefish)	46	18	17	-1
Hook-and-Line (sablefish)	0	0	0	0
Pot	0	1	1	0
Total	782	935	952	17
TOTAL (All Areas)				
Trawl	3,106	3,303	3,364	61
Hook-and-line (non-sablefish)	184	138	157	19
Hook-and-Line (sablefish)	77	105	113	8
Pot	3	4	6	2
Total	3,370	3,550	3,639	89

Table 2. 2011 through 2019 BSAI and GOA Halibut PSC Use by Sector.

Halibut Mortality (Data through 1/6/20)	2011	2012	2013	2014	2015	2016	2017	2018	2019
BERING SEA AND ALEUTIAN ISLANDS									
Bering Sea and Aleutian Islands Trawl									
Non-Pelagic Trawl (Amendment 80 C/P)	1,810	1,944	2,166	2,178	1,633	1,405	1,167	1,343	1,458
Non-Pelagic Trawl (AFA C/P)	95	117	127	204	71	78	57	105	39
Non-Pelagic Trawl (Catcher Vessels)	250	497	382	305	310	410	337	309	499
Non-Pelagic Trawl (CDQ)	135	203	194	185	100	140	129	137	168
Pelagic Trawl (AFA C/P)	167	180	166	79	74	64	57	32	66
Pelagic Trawl (AFA catcher vessels)	116	165	33	57	30	19	17	10	16
Pelagic Trawl (CDQ)	38	13	12	21	8	9	6	7	17
Bering Sea and Aleutian Islands Hook-and-line and Pot gear									
Hook-and-Line	482	556	463	402	293	196	172	120	79
Hook-and-Line (CDQ Groundfish)	68	58	58	37	22	25	18	11	4
Hook-and-Line (IFQ/CDQ sablefish)	10	8	6	3	2	1	0	0	0
Pot Gear	7	6	5	4	3	3	3	2	5
Total BSAI	3,180	3,747	3,611	3,476	2,546	2,350	1,963	2,075	2,351
GULF OF ALASKA									
Gulf of Alaska Trawl									
Non-Pelagic Trawl (Central GOA C/Vs)	1,306	1,198	741	828	961	965	750	900	741
Non-Pelagic Trawl (Western GOA C/Vs)	37	111	93	70	47	107	18	32	18
Pelagic Trawl	20	5	20	1	13	12	14	39	15
Trawl (C/P)	509	388	377	502	375	246	433	217	328
Gulf of Alaska Hook-and-line and Pot gear									
Hook & Line (C/P)	131	53	35	76	68	77	69	10	20
Hook & Line (Catcher vessels)	114	147	130	117	153	165	105	42	55
Hook & Line - IFQ sablefish	25	37	31	29	34	29	40	75	111
Pot Gear	43	41	15	10	22	44	15	1	1
TOTAL GOA	2,184	1,980	1,441	1,634	1,674	1,645	1,443	1,317	1,289
TOTAL All Areas	5,364	5,727	5,052	5,110	4,220	3,995	3,406	3,392	3,640

Figure 1. 2018 and 2019 BSAI Trawl Halibut PSC Use by Groundfish Fishery.

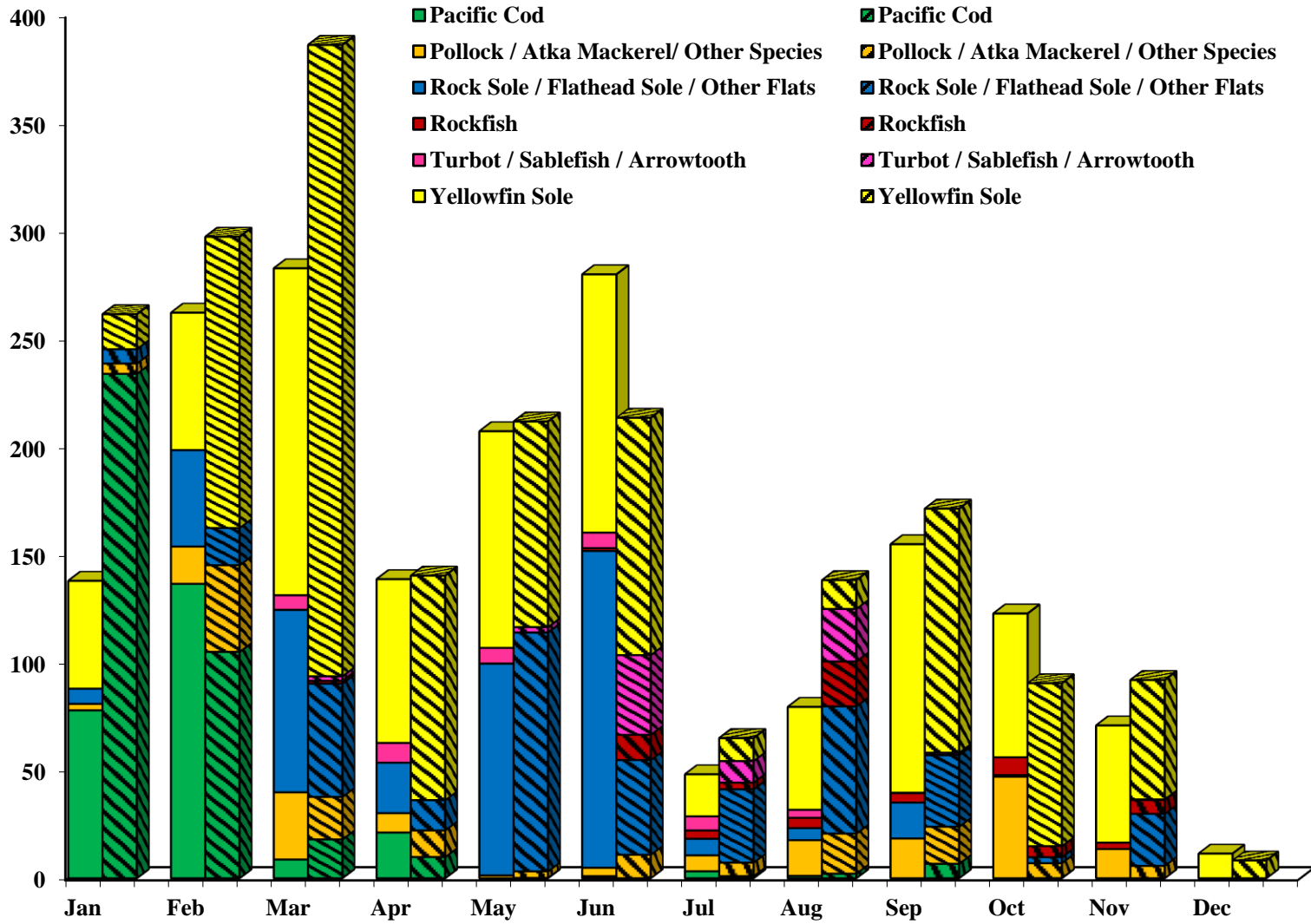


Table 3. 2019 GOA Sablefish IFQ Fishery by Gear Type

2019 Sablefish	Hook-and-Line			Pot		
	Unique Vessels	Sablefish (mt)	% of IFQ Sablefish	Unique Vessels	Sablefish (mt)	% of IFQ Sablefish
Southeast	143	2,648	91%	13	252	9%
West Yakutat	71	1,372	89%	13	164	11%
Central GOA	98	2,380	58%	24	1,691	42%
Western GOA	36	678	60%	13	453	40%
GOA Wide	221	7,078	73%	30	2,560	27%

Figure 2. 2019 Sablefish and Other Species Incidental Catch in GOA Fixed Gear Sablefish Target=

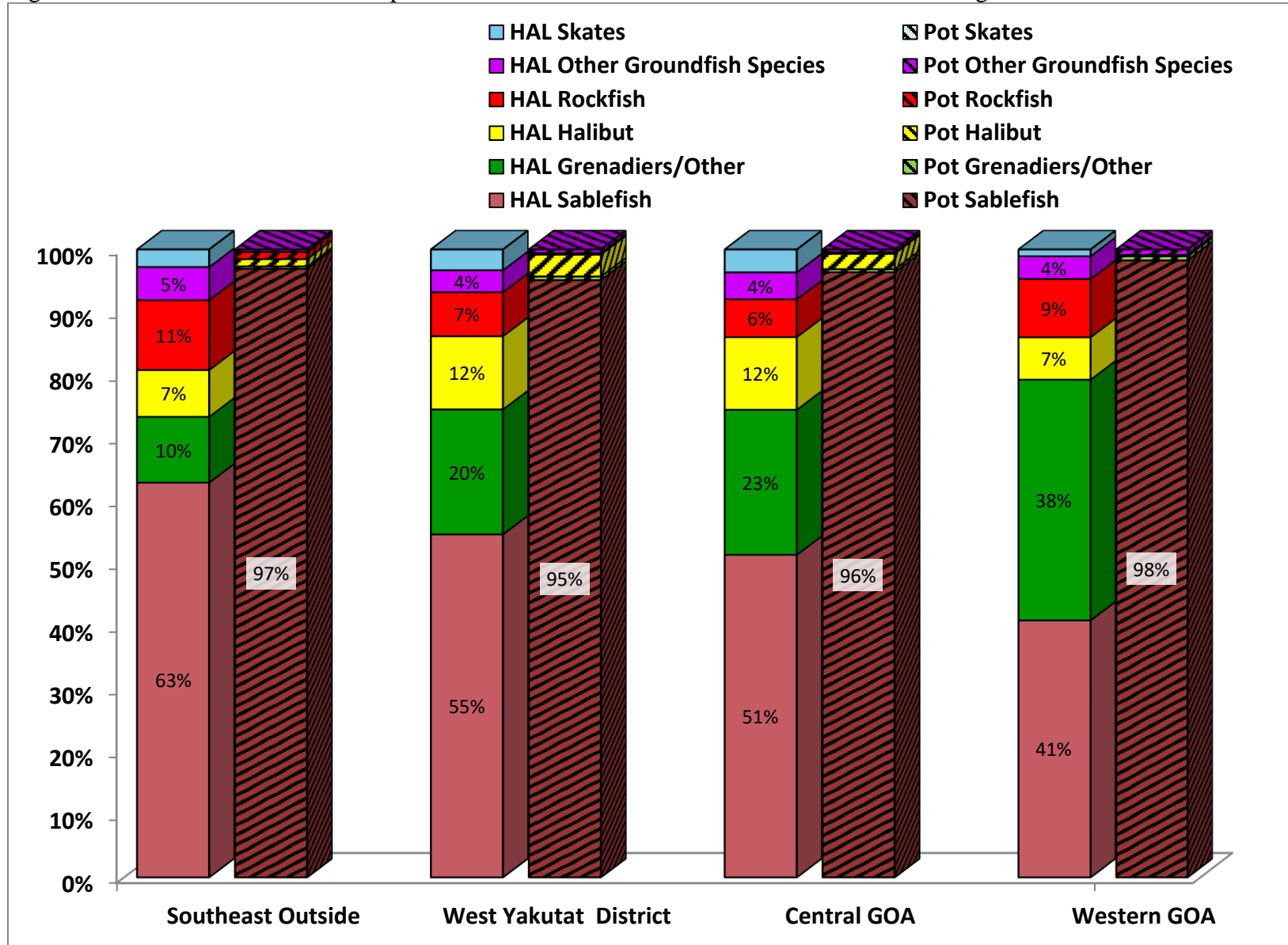
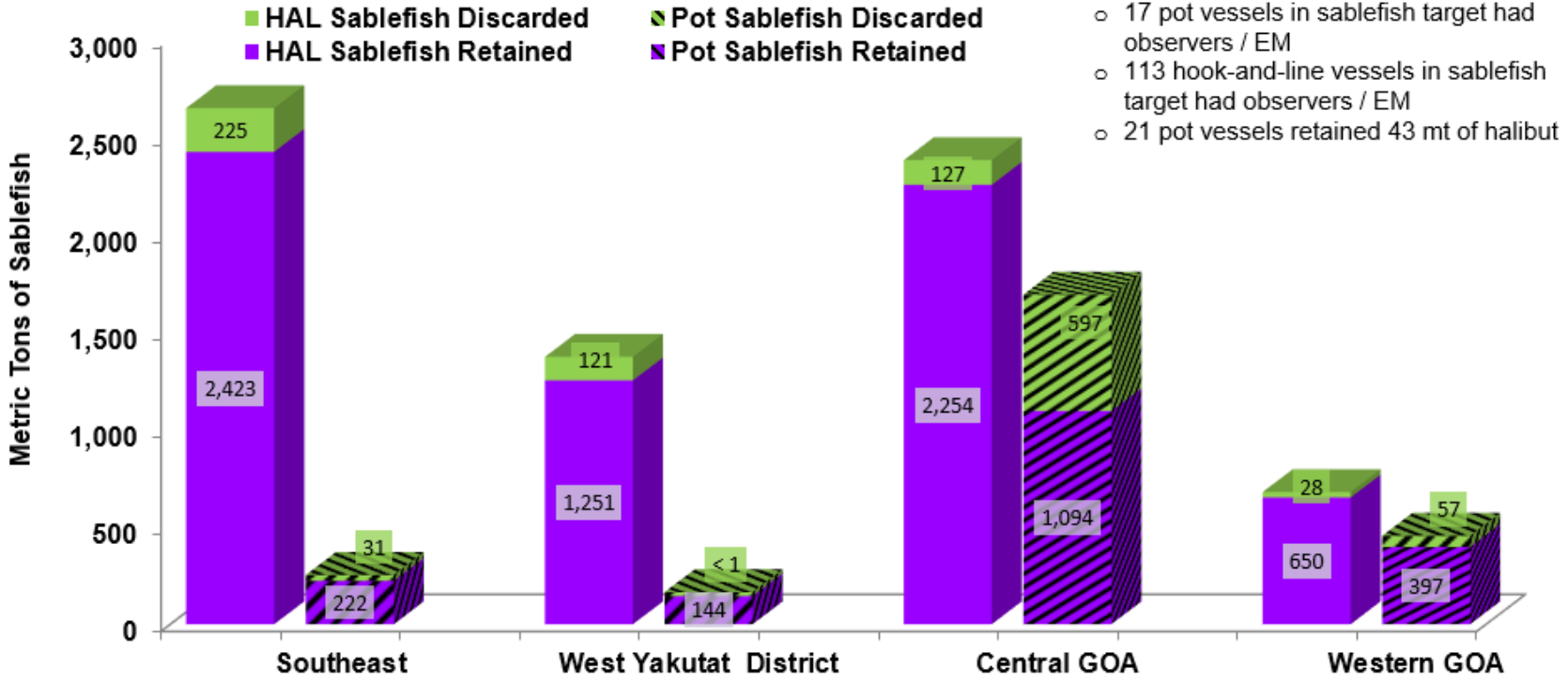


Figure 3. 2019 Sablefish Retained and Discarded by GOA Fixed Gear.



- 17 pot vessels in sablefish target had observers / EM
- 113 hook-and-line vessels in sablefish target had observers / EM
- 21 pot vessels retained 43 mt of halibut

APPENDIX 2. NOAA Fisheries Office of Law Enforcement 2019 Annual Report

**NOAA Fisheries Office of Law Enforcement
Alaska Enforcement Division
Report to the
International Pacific Halibut Commission**



January 1, 2019 to December 15, 2019

**NOAA Fisheries Office of Law Enforcement
Alaska Enforcement Division
P.O. Box 21767
Juneau, AK 99802
907-586-7225**

**TO REPORT VIOLATIONS:
Call 1-800-853-1964**

The Alaska Enforcement Division (AKD) utilizes Enforcement Officers, Special Agents and partnerships with the Alaska Wildlife Troopers and the U.S. Coast Guard to enforce federal fishing regulations over 842,000 square miles of ocean, 6,600 miles of coastline and 2,690 islands off of Alaska. Compliance is achieved by providing outreach and education, conducting patrols, monitoring offloads, and by investigating violations of civil and criminal marine resource laws.

In 2019 there were 3,398 Individual Fishing quota (IFQ) halibut permits issued in Alaska and 30 IFQ landing ports. The Alaska IFQ halibut fishery had 703 IFQ overages reported in 2019, 21 of these exceeded 10%. There were 955 charter halibut permits (578 for 2C and 488 for 3A) and 6,775 subsistence halibut permits.

Patrol and Boardings

In 2019, AKD personnel spent over 5216 hours conducting patrols to provide a visible deterrence to potential violators, to monitor fishing and other marine activities, to detect violations, to provide compliance assistance, and to provide outreach and education. OLE boarded 1129 vessels with 793 being halibut related boardings.

Vessel Boardings' Results

	2017	2018	2019
	Vessel Boardings	Vessel Boardings	Vessel Boardings
Subsistence Halibut	34	33	14
Commercial Halibut	231	473	216
Charter Halibut	185	190	302
Sport Halibut	248	168	261
<u>Total</u>	<u>698</u>	<u>864</u>	<u>793</u>

Compliance Assistance

In 2019, AKD personnel spent over 1321 hours providing outreach and education with marine resource users. Outreach efforts occurred at a number of organized events as well as contacts in communities, ports, and at-sea. The goal of OLE outreach efforts is to ensure that the most current and accurate regulatory information is widely distributed and understood.

Incidents

In 2019, AKD opened 1294 halibut related incidents including outreach, vessel boardings, dockside monitoring, and compliance assistance. Of the 1294 incidents, officers identified 555 halibut related violations which were handled by Compliance Assistance, Summary Settlement or a Written Warning.

Alaska Halibut Violations

	2017	2018	2019
Subsistence Halibut	26	58	29
Commercial Halibut	121	136	250 (*111)
Charter Halibut	203	150	159
Sport Halibut	15	64	57
Commercial Groundfish involving Halibut	19	43	60 (*11)
<u>Total</u>	<u>384</u>	<u>451</u>	<u>555</u>

*Not all violations resulted in an enforcement penalty

2019 Halibut Related Violations documented by NOAA in Alaska:

29 Subsistence halibut fishing violations; most common violations included:

- Unqualified person applied for SHARC
- Subsistence halibut with sport caught halibut.
- Improperly or unmarked subsistence halibut fishing gear
- Subsistence halibut fishing without SHARC
- Exceeding vessel hook limit
- Fillet, mutilate, or otherwise disfigure subsistence halibut in any manner that prevents the determination of the number of fish caught, possessed, or landed
 - Non-resident pulling subsistence halibut gear
 - Subsistence halibut offered for sale.

250 Commercial IFQ/CDQ halibut violations; most common violations included:

- 21 IFQ halibut overages greater than 10% in 2019
 - 48 IFQ halibut overages greater than 10% in 2018
 - 34 IFQ halibut overages greater than 10% in 2017
 - Record keeping or reporting violations (PNOL, Landing Report, Logbook, PTR, Production Reports)
 - Gear marking violations
 - Failure to release undersized halibut with a minimum of injury by allowing fish to hit the crucifer.
 - Retain undersized halibut, or discarding legal sized halibut
 - Hired Skipper and Permit Holder violations
 - Vessel Cap Overages

- Misreporting IFQ area fished or fishing in an area with no IFQ available
- Fishing without an FFP

159 Charter halibut fishing violations; most common violations included:

- Logbook violations-
 - Fail to ensure charter halibut anglers sign the logbook
 - Fail to record CHP in the ADFG logbook/invalid CHP
 - Report inaccurate information
- Failure to report GAF in the required time, submitting inaccurate information
- Illegal guiding - No CHP
- Halibut other than 2 ventral pieces, 2 dorsal pieces, and 2 cheek pieces, with a patch of skin on each piece, naturally attached (Filleting, mutilating or skinning halibut onboard a vessel).
 - Exceeding bag limit; possession limit; size limits or annual limits
 - Fishing on closed days
 - Charter fish without a CHP

57 Sport halibut fishing violations; most common violations included:

- Sale or attempted sale of sport caught halibut
- Exceeding bag and/or possession limits
- Halibut other than 2 ventral pieces, 2 dorsal pieces, and 2 cheek pieces, with a patch of skin on each piece, naturally attached (Filleting, mutilating or skinning halibut onboard a vessel).
 - Fishing without a license/permit
 - Using illegal gear
 - Sport caught halibut onboard with commercial caught salmon

60 Commercial groundfish violations involving halibut; most common violations included:

- Fail to carefully release halibut or allow halibut to contact a crucifier or hook stripper.
- Release halibut caught with longline gear by any method other than— positioning the gaff on the hook and twisting the hook from the halibut straightening the hook by using the gaff to catch the bend of the hook and bracing the gaff against the vessel or any gear attached to the vessel.
 - Puncture the halibut with a gaff or other device
 - Failure to have an IFQ hired master permit, as appropriate, in the name of the individual making the landing.

Partnerships

NOAA OLE works closely with the U.S. Coast Guard, the Alaska Wildlife Troopers (AWT), Canada Department of Fisheries and Oceans (DFO) and Royal Canadian Mounted Police (RCMP) to accomplish common goals and priorities by working together on a daily basis to maximize compliance with marine resource laws and regulations.

A NOAA OLE enforcement officer embarked on a patrol with the Alaska Wildlife Troopers onboard P/V Stimson from March 6 -27. The patrol focused on observer reported complaints, groundfish, the IFQ Sablefish/Halibut fisheries, and outreach with stops in Sand Point, King Cove, Akutan, Atka, and Adak. The officers boarded 28 vessels, inspected four processing facilities, and inspected pot gear. The team provided compliance assistance to the manager of a processing plant and to the operators of three vessels. Officers also initiated record keeping & reporting, state license, pot gear, and VMS related investigations.

The NOAA-OLE Sitka Field Office coordinated with USCG Air Station Sitka to conduct an air patrol on the morning of March 15, 2019 for the opening of the IFQ season for halibut and sablefish. The operation consisted of an Enforcement Officer flying with a four person crew aboard a USCG Helicopter. The initial tasking was to support the USCGC John McCormick by sighting and locating fishing vessels for at-sea boardings. Due to severe weather the MCCORMICK remained inside Sitka Sound for the remainder of the patrol. This allowed for a change in patrol tasking and the patrol effort was redirected south of Sitka Sound to inspect remote inlets and bays for fishing vessels or fishing gear deployed prior to the season opening. The patrol continued to Cape Decision and Fredrick Sound and then northward following Chatham Strait. Numerous vessels were sighted in route to participate in the Sitka Herring Sac Roe fishery. Seven vessels participating in IFQ fisheries were queried with location, gear status and IFQ permits being documented. The patrol continued northward to Peril Strait before terminating back at Sitka.



Two NOAA-OLE Enforcement Officers conducted a 689 nautical mile vessel patrol on the P/V Cape Elizabeth from Homer to Valdez, resulting in 77 underway hours with 128 contacts being made. This patrol prematurely terminated in Seward due to mechanical issues.



In July, three Enforcement Officers and a USCG boarding officer conducted a 5-day patrol of Kodiak waters on the PV Kingfisher targeting charter and recreational fishing and marine mammal viewing vessels. One unsafe voyage was terminated, one Compliance Assistance provided, and one Summary Settlement issued for failure to record Pacific halibut retention (PV Kingfisher pictured left).

An Enforcement Officer and Special Agent participated in a two-day coordinated international patrol in Dixon Entrance along the maritime boundary line involving a Canadian patrol vessel and the PV Natoma Bay. The first day of the patrol, officers identified illegal gear operated by a Canadian citizen in US waters and boarded a Canadian vessel sport fishing for halibut in US waters without sportfish licenses. The second day was spent working the disputed zone south of Prince of Wales Island. No Canadian vessels were observed in US waters. Five US vessels were boarded and one vessel could not provide a current US Vessel Document.

Two Enforcement Officers conducted a 6-day patrol of northern southeast Alaska, covering 846 miles. The officers patrolled to the communities of Juneau, Haines, Gustavus, and Kake and conducted inspections and outreach at two charter lodges and one processor. While underway, they boarded nine charter vessels, six sport fishing vessels and one commercial Halibut vessel. This patrol documented high compliance rates; a single logbook violation was addressed.

In August, an Enforcement Officer conducted a 10-day patrol with AWT aboard the PV Enforcer from Juneau to Yakutat. AWT issued 25 citations and seven warnings. NOAA OLE issued one Written Warning for a sport-caught halibut on a commercial salmon vessel and one Summary Settlement for failure to have clients sign the Charter Logbook. Officers boarded 59 vessels and made 327 contacts.

An Enforcement Officer conducted a 4-day offshore patrol aboard USCGC John McCormick focused on at-sea boardings in waters farther than 3NM offshore. The patrol began in Juneau and ended in Ketchikan. Ten vessels were contacted, five vessels boarded at sea, and one violation documented.

Adjudicated Significant Halibut Investigations

NOAA issued a Notice of Violation and Assessment to the operator/permit holder, and Sylver Fishing Company of Wrangell, Alaska in the amount of \$17,600. It was issued for the failure to offload and report all Pacific Halibut caught on an Individual Fishing Quota (IFQ) fishing trip.

Enforcement Officers in Petersburg conducted an investigation. It revealed that the permit holder and crew retained 600 pounds of Pacific halibut that was not deducted from their IFQ permit or documented on the landing receipt. When authorities discovered the unreported fish, the permit holder reported that the intent was to retain it for personal use and not for commercial purposes. It is a federal violation to fail to offload and report all fish taken while commercial fishing, and submit inaccurate information on a required report.

The permit holder took responsibility for the violation in a timely manner and a settlement agreement of \$15,840 was accepted for two counts of violating the Northern Pacific Halibut Act.

APPENDIX 3. United States Coast Guard District 17 2019 Annual Report

**U. S. COAST GUARD
ENFORCEMENT REPORT
(IPHC Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D and 4E)**



**TO THE
INTERNATIONAL PACIFIC HALIBUT
COMMISSION**

January 2020

*Prepared By:
Seventeenth U.S. Coast Guard District
Enforcement Branch*

I. Coast Guard Resources in Alaska

The U.S. Coast Guard (USCG) 17th District (D17) covers the U.S. waters of Alaska. The area of responsibility includes all waters off Alaska out to 200 nautical miles, and encompasses the IPHC Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, and 4E. Resources used for fisheries enforcement include cutters, aircraft, and boats from coastal stations.

Cutters:

- The 378-foot High Endurance Cutter USCGC DOUGLAS MUNRO and 282-foot Medium Endurance Cutter USCGC ALEX HALEY home-ported in Kodiak, AK regularly patrol the Bering Sea in addition to periodic patrols of North Pacific waters.
- 418-foot National Security Cutters from California and Hawaii and 378-foot High Endurance Cutters from Washington are periodically assigned to patrol D17 waters or to monitor fisheries activity during transits to other operating areas.
- Four 225-foot buoy tenders conduct periodic law enforcement and are home-ported in Sitka, Cordova, Kodiak, and Homer.
- Two 154-foot Fast Response Cutters (FRC's), home-ported in Ketchikan, AK and conduct routine law enforcement throughout Southeast and occasionally South Central Alaska.
- Five 110-foot patrol boats conduct routine law enforcement and are home-ported in Petersburg, Juneau, Valdez, Seward, and Homer.
- Two 87-foot Coastal Patrol Boats located in Puget Sound and Strait of Juan de Fuca ports make occasional patrols to SE Alaska.

Aircraft:

- Fixed wing and rotary wing aircraft are based out of Air Stations in Kodiak and Sitka.
 - Aircraft in Alaska: C-130, HH-60, HH-65

Stations:

- The three coastal small boat stations, operating 29' and 45' boats, are located in Ketchikan, Juneau, and Valdez.

The primary at-sea fisheries enforcement assets are our cutters, ranging in size from the 87-foot patrol boats up to 418-foot cutters. Patrol boats are limited in sea keeping abilities, and conduct the majority of enforcement inside of 50 nautical miles from shore. This role is fulfilled by 154-foot FRC's and 110-foot patrol boats in Alaskan waters with occasional deployments from 87-foot cutters from Washington state, which provide regular law enforcement presence in the commercial, charter, subsistence, and recreational fishing fleets. Since the commissioning of the two new FRC's in 2017, boardings have increased by 40% from the years prior. This is due in large part to the FRC's increased capabilities for operating further offshore and in greater sea state conditions, allowing for more contact with the IFQ fleet. By 2023, D17 anticipates the addition of four more FRC's and two 87-foot patrol boats throughout Alaska that will eventually completely replace the 110ft patrol boat fleet and greatly enhance boarding capabilities.

Beyond 50 nautical miles, we rely upon our larger cutters to enforce all federal fisheries regulations, with National Security Cutters and High Endurance Cutters from throughout the west coast assigned to patrol Alaskan waters.

Small boat stations primarily focus on recreational, subsistence, and charter halibut activity in their regions, although this does not preclude them from boarding commercial vessels sighted in the course of normal duties.

Fisheries law enforcement flights are frequently conducted from Air Stations in Kodiak and Sitka, using a variety of assets from fixed wing HC-130 to MH60 and MH65 helicopters.

All units involved in fisheries enforcement receive training from the Coast Guard's North Pacific Regional Fisheries Training Center in Kodiak, Alaska prior to patrolling the region. NOAA Office of Law Enforcement (OLE) agents and state fisheries enforcement officers routinely participate in the training, as well as accompany cutters and aircraft during some fisheries enforcement patrols. The success of USCG fisheries enforcement operations is enhanced by collaboration with our enforcement partners from NOAA OLE and the state of Alaska, ensuring consistent presence on the fishing grounds and at offload sites.

II. Commercial Halibut Enforcement

In 2019, the USCG distributed its enforcement assets throughout the IPHC Areas, with boarding numbers listed in Table 1. The USCG enforcement focus is to protect the resource in accordance with the fishery management plan, to ensure equal economic opportunity for all participants, and to enhance safety of life at sea.

Table 1. 2018 & 2019 Geographic Distribution of Boardings on Vessels Targeting Halibut

IPHC Area	2018 Boardings	2019 Boardings
2C	395	426
3A	327	225
3B	15	5
4A	11	17
4B	1	3
4C	0	0
4D	6	0
4E	0	0
Total	755	676

There was a 10% decrease in halibut boardings this year, largely due to an aging cutter fleet in South Central Alaska as well as competing mission priorities in this region.

In Areas 2C through 4E, the commercial fishery is rationalized with the 2019 season lasting from March 15th to November 14th. D17 law enforcement assets routinely patrolled the fishing grounds, often conducting joint boardings with or in collaboration with NOAA OLE.

Joint operations with NOAA OLE were conducted throughout the season from the Bering Sea to Southeast Alaska. These operations included at-sea boardings, aircraft patrols, and dockside inspections. The joint agency efforts are a regular and important aspect of law enforcement coordination as they enable the broadest contact rate with the fishing fleets in order to compel compliance with federal regulations while also providing the most accurate and complete picture of fishing activity on the fishing grounds and at catch offload sites.

Routine patrols are essential to maintain awareness of halibut fishing activity. The long duration of the commercial season relieves the pressure to fish during inclement weather. This also gives participants the opportunity to spread their effort throughout the season as well as their permitted area.

The lack of a universal requirement for fishing vessels targeting halibut to be equipped with VMS on board means there is not a centralized means to assess and monitor fishing activity in Areas 2C through 4E. Time intensive patrols by surface and aviation assets are the primary means to identify where vessels are fishing for halibut. The need for patrols is amplified when market forces and/or fair weather conditions cause an increase in fishing activity.

Participants in the commercial halibut fishery only make up a portion of the hook and line vessels on the fishing grounds. During boardings of the hook and line vessels, USCG enforcement efforts focus on (1) adherence to permit requirements for area and individual quota, (2) safe release of halibut bycatch by other commercial vessels, (3) consistent use of seabird avoidance gear, (4) indicators of high-grading catch, (5) retention of rockfish and Pacific cod, (6) complete offload of catch, and (7) timely compliance with all recordkeeping requirements.

III. Recreational Halibut Enforcement

Recreational activity occurs in Areas 2C, 3A, and 3B in the form of individual and charter fishing. The season lasts from 01 February to 31 December but is most prevalent from May through September. USCG assets increase fisheries patrols during this time to focus on popular fishing grounds in Southeast Alaska, Prince William Sound, Cook Inlet, and the Gulf of Alaska. 75% of the halibut boardings accomplished by D17 assets in 2019 were conducted on the recreational and charter vessels.

During boardings, emphasis is placed on compliance with licensing and charter operation requirements as well as requirements which determine the size and number of halibut allowed to be caught.

IV. Violations and Enforcement Summary

Overall, USCG assets boarded a total of 679 vessels and detected 11 IPHC violations. Violations are documented and referred to NOAA OLE or Alaska Wildlife Troopers (for violation detected on recreational vessels) for final action. Table 3 compares at-sea boardings and violations between 2018 and 2019.

Table 3. 2018 & 2019 Boarding and Violation Summaries by Industry Sector

2018 Boardings/Violations	2019 Boardings/Violations
Total Fleet 5,025	Total Fleet 5,025
Commercial 825	Commercial 825
Charter 950	Charter 950
Recreational/Subsistence 3,250	Recreational/Subsistence 3,250
Total At-Sea Boardings 754	Total At-Sea Boardings 679
Commercial 167	Commercial 167
Charter 104	Charter 177
Recreational/Subsistence 483	Recreational/Subsistence 332
Fisheries Violations 12	Fisheries Violations 11
Commercial 5	Commercial 7
Charter 3	Charter 1
Recreational/Subsistence 4	Recreational/Subsistence 3
Fisheries Compliance Rates 98.4%	Fisheries Compliance Rates 98.3%
Commercial 97.1%	Commercial 95.8%
Charter 97.1%	Charter 99.4%
Recreational/Subsistence 99.2%	Recreational/Subsistence 99.1%

In Area 2C:

- One commercial vessel was cited for failing to have permits on board.

In Area 3A:

- A commercial vessel was cited for not having fishing permit or IFQ permits on board.
- A joint boarding with NOAA OLE led to recreational mutilated halibut being seized.
- A joint boarding with NOAA OLE led to a citation for a recreational fisherman fishing without a license and another retaining halibut over the legal limit.
- A charter operation was cited for not filling out harvest tickets.

In Area 3B:

- A vessel was cited for an expired permit hired master permit and no IFQ permit on board.

In Area 4A:

- A commercial vessel was sighted for not having an IFQ permit on board.
- A commercial vessel was sighted for not having a boarding ladder.

Detected violations are transferred to NOAA OLE for disposition and outcomes ranged from compliance assistance, summary settlements, or catch seizures. The violations described above by their

IPHC Area are listed below in Table 4 by violation type. This summary of IPHC and federal violations compares 2018 violations to 2019 violations detected by USCG units.

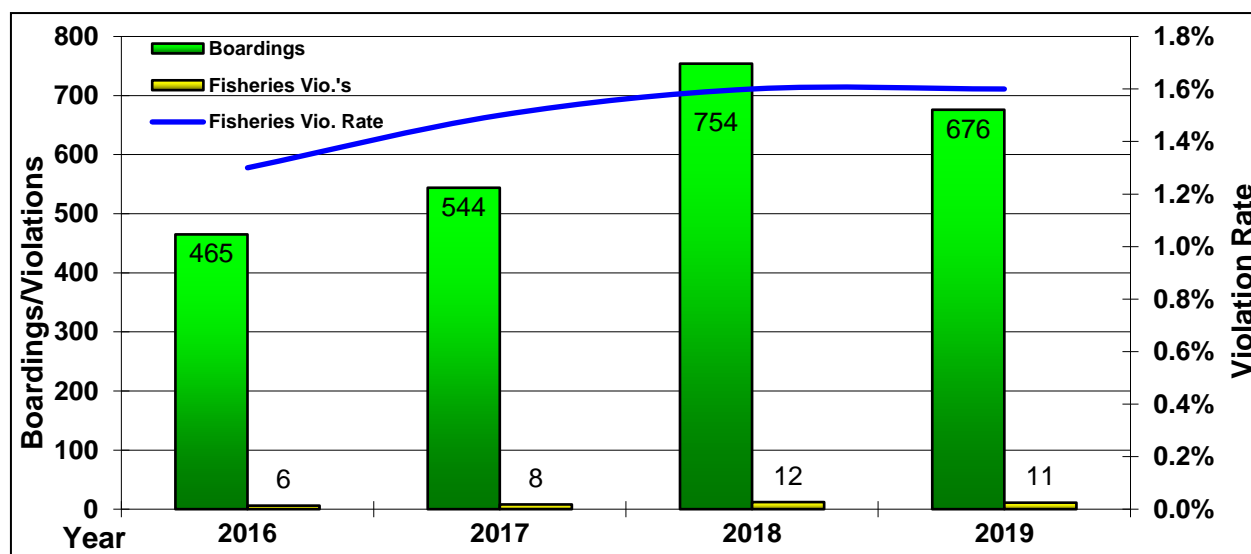
Table 4. 2019 Description of Fisheries Violations in All Sectors

2018	2019
Failure to have a boarding ladder.....2	Mutilation of catch.....1
Mutilation of catch.....1	Not filling out harvest ticket..... 1
Shooting at Stellar Sea Lions.....1	Permit not available for inspection.....6
Failure to produce CHP/ logbook.....3	No pilot ladder1
Copy of IFQ permit not ready for inspection.....2	Fishing without license.....1
Sport fishing without a permit.....2	Retaining over legal limit.....1
Fishing in Restricted area.....1	
Total.....12	Total.....11

In addition to the IPHC violations summarized in Tables 3 and 4, vessel safety issues encountered by our law enforcement assets across all halibut sectors included insufficient lifesaving equipment, improper navigation equipment, and missing documentation totaling 89 safety violations across all sectors. The USCG continues to pursue increased at-sea boarding opportunities to promote compliance with both safety and fisheries regulations.

The USCG continues to maximize joint enforcement efforts and information sharing with federal and state fisheries enforcement partners to optimize operations. Similar to recent seasons, USCG field commands held pre-season meetings with federal and state partners to coordinate efforts.

Figure 1. 2016-2019 Boardings and Fisheries Violations



The halibut fisheries violation rate averaged 1.5% over the last four years. The USCG continues to pursue a steady focus on compliance across IFQ, charter, subsistence, and recreational fisheries by maximizing boarding opportunities and detecting violations where they occur.

V. Enforcement Plans for 2020

The USCG will continue joint pulse operations with NOAA and state enforcement partners to focus enforcement efforts across the commercial, charter, subsistence, and sport sectors of the halibut fishery.

The USCG will continue to enforce regulatory requirements which became effective in 2015 and 2016; mandatory dockside Commercial Fishing Vessel Safety Examinations (CFVSE) for all vessels which operate beyond three nautical miles from shore, and the carriage of AIS units for vessels over 65 feet in length. Commercial Fishing Vessel Safety inspectors continued to educate the industry about both requirements and have facilitated dockside exams to bring vessels into compliance. Vessels which operate beyond three nautical miles without a CFVSE or which fail to meet applicable AIS carriage requirements may receive a notice of violation if the deficiency is observed during an at-sea boarding.

The commercial and recreational halibut fisheries in Alaskan waters continue to draw high national and international interest. D17 will continue to actively patrol throughout the season and emphasize joint operations with our federal and state partners, NOAA OLE and the Alaska Wildlife Troopers.

By sustaining effort to patrol all areas where halibut fisheries occur, the USCG will strive to continually promote a level playing field for all participants and enhance safety at sea. Our goal is consistent and targeted enforcement presence applied fairly across all commercial, charter, subsistence, and recreational fleets.

With the continued replacement of the 110ft cutters with Fast Response Cutters, there will be higher contact rates with the fishing fleets. The longer range and better sea keeping abilities will allow the FRC's to stay on scene longer and more effectively monitor the fisheries.

APPENDIX 4. Alaska Department of Fish and Game Halibut Subsistence and Charter Halibut Management Measures Reports



THE STATE
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FISHERY SECTORS

Subsistence and Recreational

IPHC REGULATORY AREAS

IPHC Regulatory Areas 2C, 3, and 4 (USA: Alaska)

DISCUSSION

Subsistence:

Subsistence Harvests of Pacific Halibut in Alaska, 2018

Through a grant from the National Marine Fisheries Service (NMFS) (NA18NMF4370086), the Alaska Department of Fish and Game (ADF&G) Division of Subsistence conducted a study to estimate the subsistence harvests of Pacific halibut in Alaska in 2018. The full results appear in Technical Paper No. 456, “Subsistence Harvests of Pacific Halibut in Alaska, 2018” (Fall and Koster 2020).

In May 2003, the NMFS published final federal regulations for a subsistence halibut fishery in Alaska. Residents of 118 rural communities and designated rural areas, and members of 123 tribes are eligible to participate. Fishers must obtain a subsistence halibut registration certificate (SHARC) from NMFS before fishing.

To estimate the 2018 harvests, a one-page survey form was mailed to SHARC holders in early 2019 or administered in person in four communities. After three mailings and community visits, 5,852 of 8,576 potential subsistence halibut fishers (68%) responded. Participation in the survey was voluntary.

An estimated 4,094 individuals subsistence fished for halibut in Alaska in 2018, about 21% below the long-term average since 2003. The estimated subsistence harvest was 29,963 halibut for 615,789 pounds net weight. This is the lowest harvest estimate for the fishery since the current regulations came into effect and is about 33% below the annual average since 2003.

Of the 2018 total subsistence halibut harvest, 78% was harvested with setline (stationary) gear (longline or skate) and 22% was harvested with hand-operated gear (handline or rod and reel). This pattern was similar to other study years.

Also similar to other years, in 2018, the largest subsistence harvests of halibut occurred in Southeast Alaska (Halibut Regulatory Area 2C), at 59% of the total, followed by Southcentral Alaska (Area 3A) at 30%, and East Bering Sea Coast (Area 4E) at 4%. Remaining areas accounted for about 7% of the state total.

Based on data from the International Pacific Halibut Commission and this study, the estimated halibut removal in Alaska in 2018 was 30.151 million pounds, net weight. Subsistence harvests accounted for 2.1% of this total.

In response to a new question, 53% of survey respondents said they had met their needs for halibut in 2018, and 47% said they had not. Lack of effort, inoperative equipment, and time constraints were the most-cited reasons for not meeting needs.

The report concludes that the project was a success, with good response rates and a reliable estimate of subsistence halibut harvests in Alaska for 2018. Outreach is necessary to maximize enrollment of fishers in the SHARC program, as is additional research to understand trends in the fishery. Due to budget constraints, a survey to estimate subsistence halibut harvests in Alaska in 2019 will not take place. The report recommends that monitoring of the Alaska subsistence halibut harvest resume in the future.

Recreational:

In October 2019, the department provided final estimates of the 2018 sport harvest and preliminary estimates of the 2019 sport harvest for Areas 2C, 3A, 3B, and 4. The full report is in Appendix 2.

2018 Final Harvest Estimates

The Area 2C charter fishery allocation for 2018 was 0.81 Milb (harvest and O26 release mortality). Regulations included a one-fish bag limit and reverse slot (or “protected slot”) limit that allowed harvest of halibut less than or equal to 38 inches and halibut greater than or equal to 80 inches. The Area 3A charter allocation was 1.79 Milb (harvest and O26 release mortality). Regulations included a two-fish bag limit with a maximum size on one of the fish of 28 inches, a limit of one trip per charter vessel per day (on which halibut are harvested), a limit of one trip per Charter Halibut Permit (CHP) per day, a closure of halibut retention on Wednesdays all year, six Tuesday closures (7/10 thru 8/14), and a 4-fish annual limit with a harvest recording requirement. Charter captains and crew were not allowed to retain halibut while guiding clients in Area 2C or Area 3A under regulations of the North Pacific Fishery Management Council’s Catch Sharing Plan (CSP) for these areas. Charter fishery regulations in the remainder of the state included a daily bag limit of two fish of any size, and there was no prohibition on retention of halibut by captains or crew. Unguided fisheries statewide were managed under a two-fish bag limit with no size limit.

The 2018 Area 2C estimated sport harvest (excluding release mortality) was 127,680 fish, for a yield of 1.873 million pounds. 2C charter removals (including all sizes of release mortality) were estimated to be 0.718 Milb. Unguided removals were estimated to be 1.231 Milb. The Area 3A estimated sport harvest was 242,192 fish, for a yield of 3.429 Milb. 3A charter removals (including release mortality) were estimated to be 1.893 Milb. Unguided removals were estimated to be 1.575 Milb. Areas 3B and 4 do not have separate charter allocations. The final harvest estimates were 269 halibut in Area 3B and 900 halibut in Area 4. Applying the unguided average weight from Kodiak of 14.08 lb resulted in yield estimates of 0.004 Milb in Area 3B and 0.013 Milb in Area 4. Additional detail on numbers of fish harvested and released, releases by size category, average weights, and confidence intervals can be found in tables 1, 3, and 4 of Appendix 2. Information on harvest by port and historical harvest can be found in Area 2C and 3A Final 2018 Charter Harvest Estimates (North Pacific Fisheries Management Council 2019).

2019 Preliminary Harvest Estimates

The Area 2C charter fishery allocation for 2019 was 0.82 Milb (harvest and O26 release mortality). Regulations included a one-fish bag limit and reverse slot of less than or equal to 38 inches and greater than or equal to 80 inches. The Area 3A charter allocation was 1.89 Milb (harvest and O26 release mortality). Regulations included a two-fish bag limit with a maximum size on one of the fish of 28 inches, a limit of one trip per charter vessel per day and per CHP per day, a closure of halibut retention on Wednesdays all year, five Tuesday closures (7/16 thru 8/13), and a 4-fish annual limit with a recording requirement. Charter captains and crew were not allowed to retain halibut while guiding clients in Area 2C or Area 3A. Charter fishery regulations in the remainder of the state included a bag limit of two fish of any size. Unguided fisheries statewide were managed under a two-fish bag limit with no size limit.

The preliminary estimates of 2019 sport halibut harvest and yield in Area 2C were 128,608 halibut and 1.770 Milb, respectively. 2C charter removals (including all sizes of release mortality) were estimated to be 0.667 Milb. Unguided removals were estimated to be 1.151 Milb. The preliminary estimate for Area 3A was 251,658 halibut, for a total sport fishery yield of 3.636 Milb. 3A charter removals were estimated to be 2.019 Milb. Unguided removals were estimated to be 1.664 Milb. The preliminary harvests for 2019 were 243 halibut in Area 3B and 810 halibut in Area 4. Applying the unguided average weight from Kodiak of 16.92 lb resulted in removal projections of 0.004 Milb in Area 3B and 0.014 Milb in Area 4. Additional detail on numbers of fish harvested and released, releases by size category, average weights, and confidence intervals can be found in tables 2, 4, and 5 of Appendix 2.

2C and 3A Charter Halibut Management Measure Analyses

In addition to estimating all recreational halibut harvest in Alaska, the Alaska Department of Fish and Game is responsible for analyzing alternative management measures for the charter halibut fisheries in Areas 2C and 3A. Analyses were requested by the Charter Halibut Management Committee on 29 October 2019 and results were presented at the North Pacific Fisheries Management Council meeting in December, 2019. Additional Analyses for Regulatory Area 3A will be presented at the upcoming Council meeting in January, just prior to AM096. Projected removals in 2020 under status quo regulations are 0.73 Milb in 2C and 1.94 Milb in 3A. A full report of the analyses and results can be found in Analysis of Charter Mgmt Options 2C 3A for 2020 (Webster and Powers 2019).

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ATTACHMENTS

Attachment 1 – Summary of Subsistence Harvests of Pacific Halibut in Alaska, 2018

Attachment 2 – Letter to Lara Erikson (IPHC) from Sarah Webster, Mike Jaenicke, Diana Tersteeg, Martin Schuster, and Marian Ford (ADFG – DSF) reporting on the Alaska recreational halibut fishery.

Attachment 1 – Summary of Subsistence Harvests of Pacific Halibut in Alaska, 2018

SUBSISTENCE HARVESTS OF PACIFIC HALIBUT IN ALASKA, 2018

Division of Subsistence, Alaska Department of Fish and Game
333 Raspberry Road, Anchorage, AK 99518
January 2020

Through a grant from the National Marine Fisheries Service (NMFS) (NA18NMF4370086), the Alaska Department of Fish and Game (ADF&G) Division of Subsistence conducted a study to estimate the subsistence harvests of Pacific halibut in Alaska in 2018. The full results of the study appear in the division's Technical Paper No. 456, "Subsistence Harvests of Pacific Halibut in Alaska, 2018" (January 2020). Key points in the report include the following:

- In May 2003, the NMFS published final federal regulations for a subsistence halibut fishery in Alaska. Residents of 118 rural communities and designated rural areas, and members of 123 tribes are eligible to participate. Fishers must obtain a subsistence halibut registration certificate (SHARC) from NMFS before fishing (www.fakr.noaa.gov/ram/subsistence/halibut.htm; 800-304-4846).
- 2018 was the 16th year in which subsistence halibut fishing took place under these regulations, with harvest estimates available for every year but 2013, 2015, and 2017. Information about subsistence halibut harvests in prior study years is reported in Division of Subsistence Technical Papers 288, 304, 320, 333, 342, 348, 357, 367, 378, 388, 414, and 436.
- To estimate the 2018 harvests, a one-page survey form was mailed to SHARC holders in early 2019 or administered in person in four communities. After three mailings and community visits, 5,852 of 8,576 potential subsistence halibut fishers (68%) responded. Participation in the survey was voluntary.
- An estimated 4,094 individuals subsistence fished for halibut in 2018 (Table 5; Figure 8).
- The estimated subsistence harvest was 29,963 halibut for 615,789 pounds net weight (Table 5).
- Of this total, 78% was harvested with setline (stationary) gear (longline or skate) and 22% was harvested with hand-operated gear (handline or rod and reel) (Table 5).
- The largest subsistence harvests occurred in Southeast Alaska (Halibut Regulatory Area 2C), at 59% of the total, followed by Southcentral Alaska (Area 3A) at 30%, and East Bering Sea Coast (Area 4E) at 4%. Table 5 and Figure 16 from the final report give more details on harvests by gear type and area.
- Based on place of residence of SHARC holders, communities with the largest subsistence halibut harvests in 2018 were Kodiak and Sitka (the largest eligible communities) (Figure 21).
- Based on data from the International Pacific Halibut Commission and this study, the estimated halibut removal in Alaska in 2018 was 30.151 million pounds, net weight. Subsistence harvests accounted for 2.1% of this total (Figure 29).
- In response to a new question, 53% of survey respondents said they had met their needs for halibut in 2018, and 47% said they had not. Lack of effort, inoperative equipment, and time constraints were the most-cited reasons for not meeting needs.
- The report concludes that the project was a success, with good response rates and a reliable estimate of subsistence halibut harvests. Outreach is necessary to maximize enrollment of fishers in the SHARC program, as is additional research to understand trends in the fishery.
- Due to budget constraints, a survey to estimate subsistence halibut harvests in Alaska in 2019 will not take place. The report recommends that monitoring of the Alaska subsistence halibut harvest resume in the future to evaluate trends in the fishery.

For a copy of the full report, go to <http://www.adfg.alaska.gov/sf/publications/>, or call the Division of Subsistence of ADF&G at 907-267-2353 (Anchorage) or 907-465-3617 (Douglas).

Table 5.—Estimated subsistence harvests of halibut in Alaska in number of fish and pounds net (dressed, head off) weight, by regulatory area and subarea, 2018.

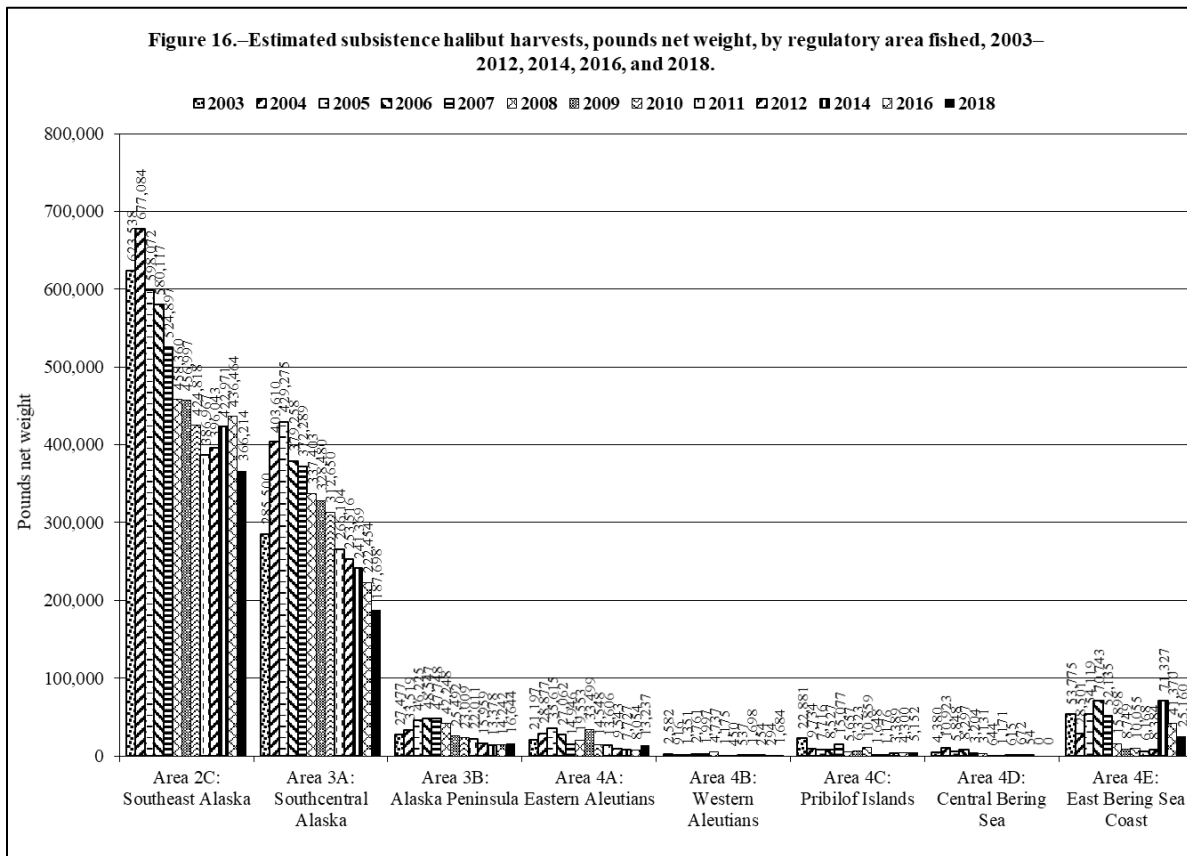
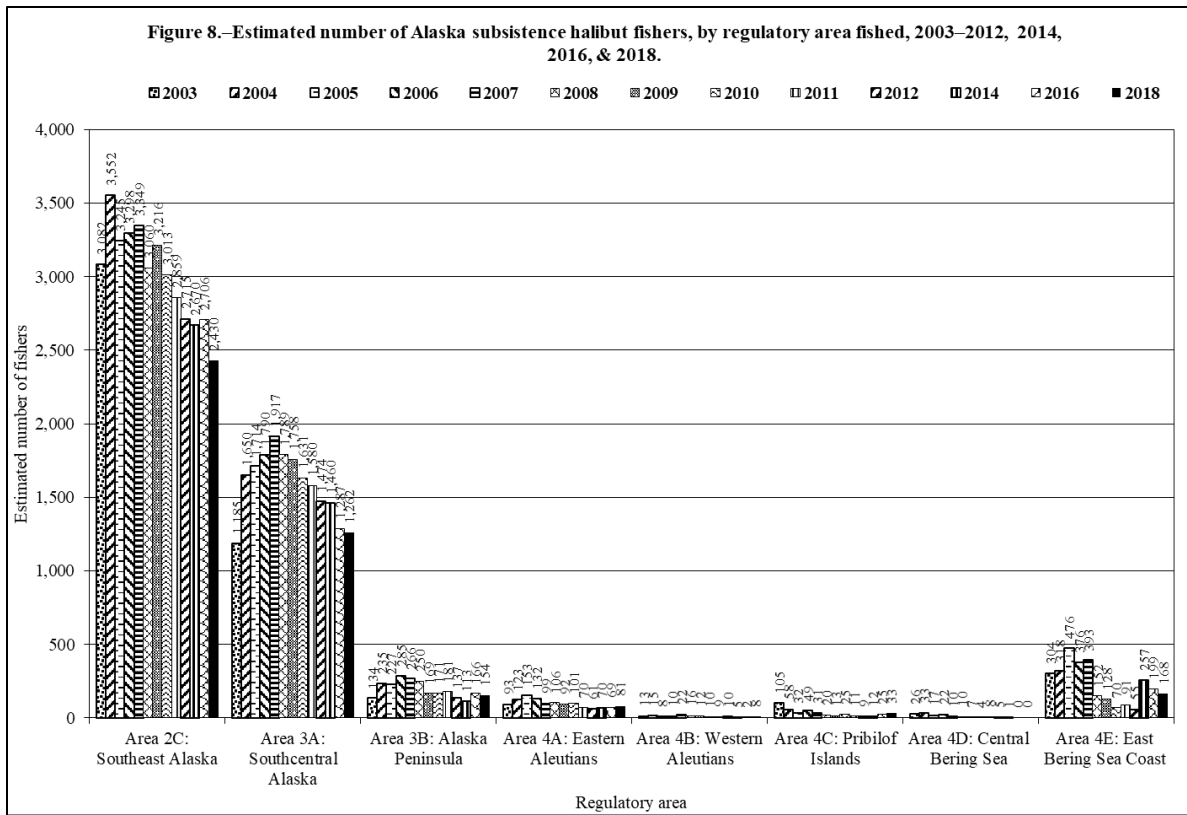
Subarea	Regulatory area	Number of SHARCs subsistence fished ^c	Estimated subsistence harvest by gear type									Estimated sport harvest		
			Setline gear ^a			Hand-operated gear ^a			All gear			Estimated number respondents	Estimated number halibut	Estimated pounds halibut
			Estimated number respondents fished ^c	Estimated number halibut harvested	Estimated pounds halibut harvested ^b	Estimated number respondents fished ^c	Estimated number halibut harvested	Estimated pounds halibut harvested ^b	Estimated number respondents fished ^c	Estimated number halibut harvested	Estimated pounds halibut harvested ^b			
Southern Southeast Alaska	2C	1,303	1,130	6,770	167,704	493	1,989	39,805	1,303	8,758	207,509	725	2,553	48,426
Sitka LAMP Area	2C	640	590	2,843	71,498	184	380	8,258	640	3,223	79,757	262	706	13,432
Northern Southeast Alaska	2C	558	507	2,904	66,991	181	667	11,958	558	3,570	78,948	248	707	14,918
	2C Total	2,430	2,167	12,516	306,193	824	3,035	60,021	2,430	15,551	366,214	1,189	3,966	76,776
Yakutat Area	3A	80	66	674	13,319	20	184	3,009	80	858	16,327	47	158	3,270
Prince William Sound	3A	248	215	1,211	25,029	82	314	6,115	248	1,525	31,143	108	280	6,395
Cook Inlet	3A	209	136	1,089	20,135	140	1,180	14,503	209	2,269	34,638	133	583	7,908
Kodiak Island road system	3A	457	416	2,880	55,201	156	413	7,214	457	3,293	62,415	279	760	14,639
Kodiak Island other	3A	400	344	1,880	32,853	176	552	10,321	400	2,432	43,174	226	590	11,376
	3A Total	1,262	1,064	7,735	146,536	510	2,643	41,162	1,262	10,378	187,698	697	2,371	43,588
Chignik Area	3B	18	18	68	1,083	4	7	100	18	75	1,183	0	0	0
Lower Alaska Peninsula	3B	136	75	350	6,055	105	441	9,406	136	791	15,461	18	67	1,472
	3B Total	154	93	417	7,138	109	448	9,506	154	865	16,644	18	67	1,472
Eastern Aleutians—east	4A	78	58	273	7,981	55	155	4,457	78	428	12,438	50	162	3,084
Eastern Aleutians—west	4A	8	8	33	705	3	13	94	8	45	799	0	0	0
	4A Total	81	61	306	8,687	55	168	4,551	81	474	13,237	50	162	3,084
Western Aleutians—east	4B	8	5	51	1,505	5	6	178	8	56	1,684	5	8	261
	4B Total	8	5	51	1,505	5	6	178	8	56	1,684	5	8	261
St George Island	4C	7	4	9	131	3	8	270	7	16	401	0	0	0
St Paul Island	4C	26	14	321	3,896	12	36	855	26	357	4,751	0	0	0
	4C Total	33	18	329	4,027	15	44	1,125	33	373	5,152	0	0	0
	4D Total	0	0	0	0	0	0	0	0	0	0	0	0	0
Bristol Bay	4E	23	22	85	1,844	17	28	778	23	113	2,622	6	0	0
Yukon-Kuskokwim Delta	4E	139	19	294	4,351	127	1,839	17,737	139	2,133	22,088	4	196	324
Norton Sound	4E	6	6	19	450	0	0	0	6	19	450	0	0	0
	4E Total	168	46	398	6,645	144	1,867	18,515	168	2,266	25,160	10	196	324
Grand Total		4,094	3,417	21,752	480,731	1,645	8,210	135,058	4,094	29,963	615,789	1,942	6,770	125,505

Source Alaska Department of Fish and Game, Division of Subsistence, SHARC Survey, 2019

a. "Setline gear" = longline or skate; "hand-operated" gear = rod and reel or handline.

b. Weights given are "net weight" (dressed, head off) = .75 of round (whole) weight.

c. Because they may fish in more than one area, subtotals for estimated number of respondents who fished for regulatory areas and the state total might exceed the sum of the subarea values.



c

Figure 21.—Alaska subsistence halibut harvests by place of residence, 2018.

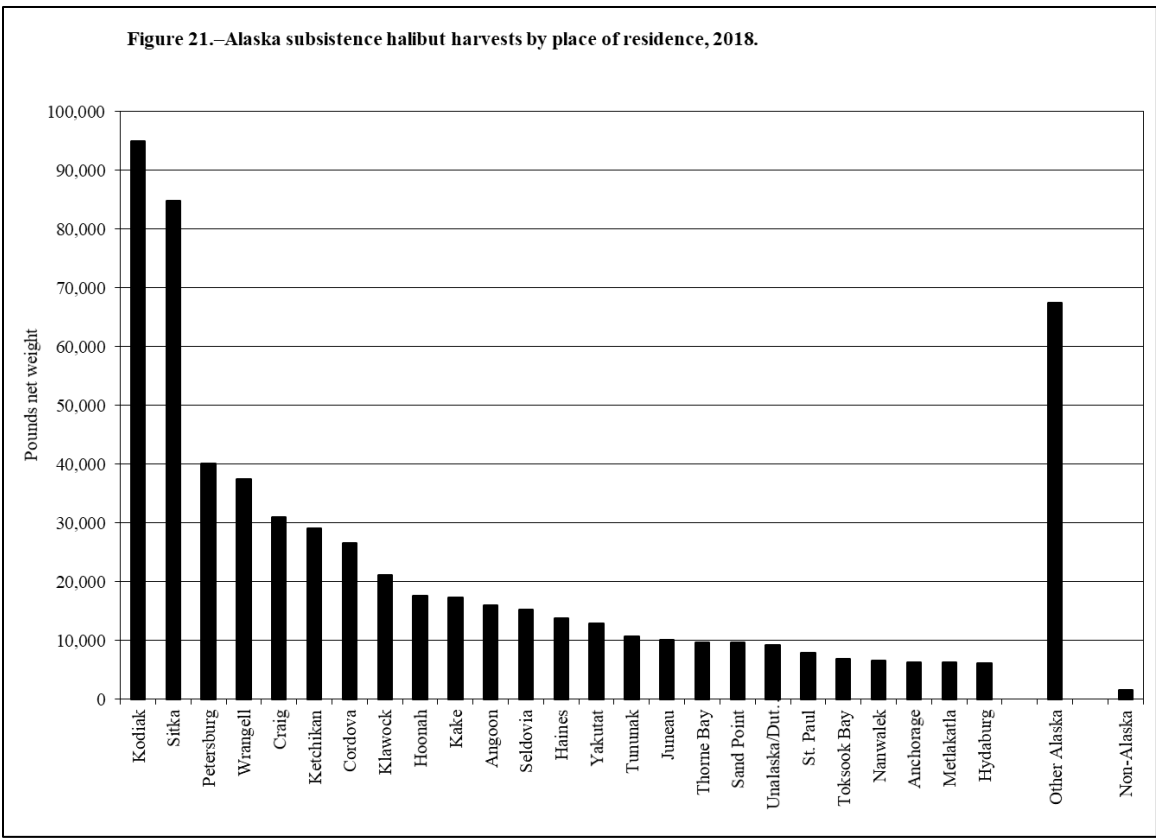
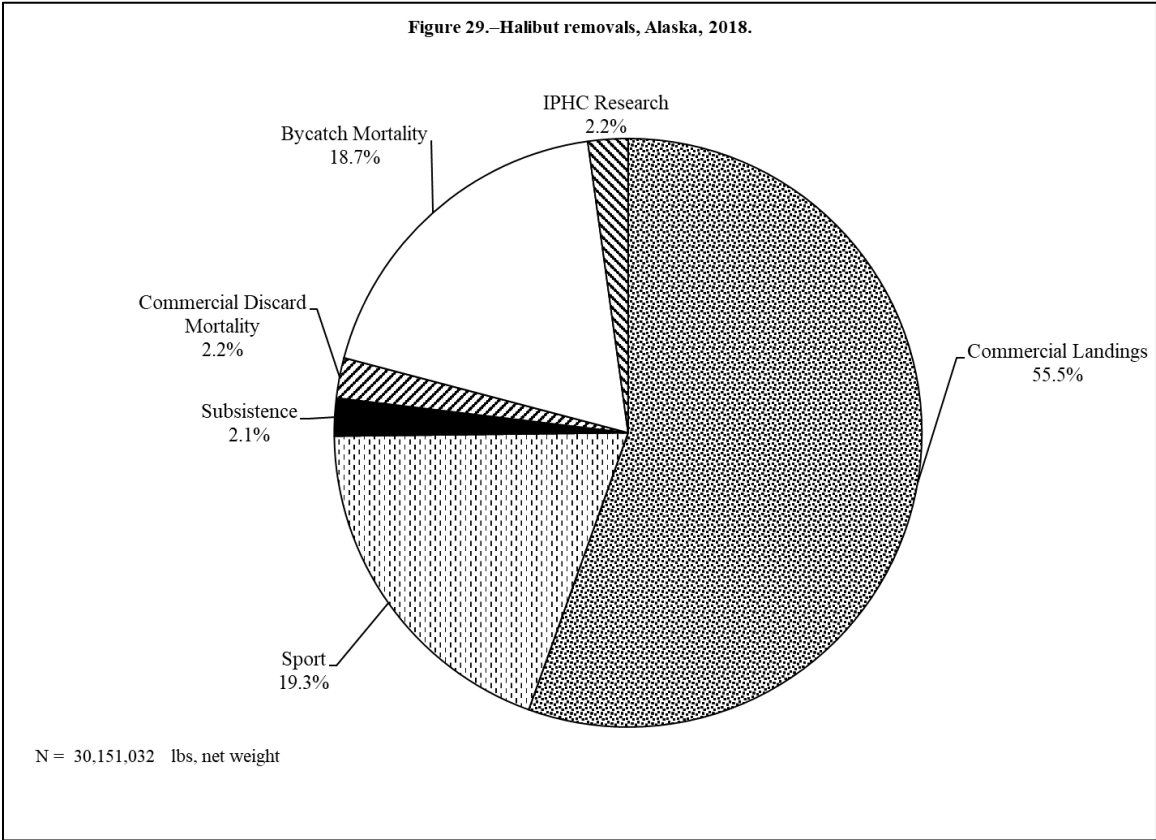


Figure 29.—Halibut removals, Alaska, 2018.



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Attachment 2 – Letter to Lara Erikson (IPHC) from Sarah Webster, Mike Jaenicke, Diana Tersteeg, Martin Schuster, and Marian Ford (ADFG – DSF) reporting on the Alaska recreational halibut fishery.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

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October 28, 2019

(sent via email)

Lara Erikson
International Pacific Halibut Commission
2320 West Commodore Way
Salmon Bay, Suite 300
Seattle, WA 98199-1287

Dear Ms. Erikson:

This letter represents our report on the Alaska recreational halibut fishery in support of the annual IPHC stock assessment. This year's letter provides:

1. Final 2018 estimates of sport fishery harvest and yield by IPHC regulatory area,
2. Preliminary 2019 estimates of harvest and yield by IPHC area,
3. Final 2018 and preliminary 2019 estimates of sport fishery release mortality by IPHC area, and
4. Final 2018 estimates of sport fishery yield prior to the mean IPHC longline survey date in Areas 2C and 3A.

Each section includes a summary of the methods used and basic results. More detailed information on methods can be found in the following project operational plans:

Southeast Region creel sampling: <http://www.adfg.alaska.gov/FedAidPDFs/ROP.SF.1J.2019.01.pdf>

Southcentral Region creel sampling: <http://www.adfg.alaska.gov/FedAidPDFs/ROP.SF.2A.2016.20.pdf>

Statewide halibut estimation: <http://www.adfg.alaska.gov/FedAidPDFs/ROP.SF.4A.2014.08.pdf>

We hope this information satisfies the IPHC's needs. Please feel free to contact us if you require clarification or additional information.

Sincerely;

Sarah Webster, Mike Jaenicke, Diana Tersteeg, Martin Schuster, and Marian Ford
Fishery Biologists

Final Estimates of 2018 Sport Harvest and Yield

In October 2018 we provided preliminary estimates of the 2018 sport harvest for Areas 2C, 3A, 3B, and 4. This letter provides final estimates of the 2018 sport harvest based on Alaska Department of Fish and Game (ADF&G) saltwater logbook data as of October 12, 2019, and final estimates from the ADF&G Statewide Harvest Survey (SWHS). The final estimates for Area 2C and 3A will also be posted on the North Pacific Fishery Management Council web site.

The Area 2C charter fishery regulations for 2018 included a one-fish daily bag limit and reverse slot (or “protected slot”) limit that allowed harvest of halibut less than or equal to 38 inches and halibut greater than or equal to 80 inches. The Area 3A charter regulations included a two-fish bag limit with a maximum size on one of the fish of 28 inches, a limit of one trip per charter vessel per day (on which halibut are harvested), a limit of one trip per Charter Halibut Permit (CHP) per day, a closure of halibut retention on Wednesdays all year, six Tuesday closures (7/10 thru 8/14), and a 4-fish annual limit with a harvest recording requirement. Charter captains and crew were not allowed to retain halibut while guiding clients in Area 2C or Area 3A under regulations of the North Pacific Fishery Management Council’s Catch Sharing Plan (CSP) for these areas. Charter fishery regulations in the remainder of the state included a daily bag limit of two fish of any size, and there was no prohibition on retention of halibut by captains or crew. Unguided fisheries statewide were managed under a two-fish bag limit with no size limit.

Methods:

For Areas 2C and 3A, sport fishery yield was calculated separately for the charter and unguided sectors as the product of the number of fish harvested and average weight of harvested halibut. Yield estimates do not include release mortality (provided later in this document). Estimates were done for six subareas in Area 2C and eight subareas in Area 3A and summed. Charter harvest was based entirely on logbook data, per the provisions of the CSP. Unguided harvest was estimated through the SWHS. Standard errors of the SWHS estimates for the unguided sector were obtained by bootstrapping. Average net weight was estimated by applying the IPHC length-weight relationship to length measurements of harvested halibut sampled at major ports in Areas 2C and 3A. All fish from each vessel-trip selected for sampling were measured. Bootstrapping was used to estimate the standard errors of average weight. The estimate of charter average weight for Homer was stratified to account for differences in sizes of halibut cleaned at sea and cleaned onshore. Length measurements from sites in the Glacier Bay subarea included fish caught in Areas 3A and 2C; average weights were calculated separately for each area and sector. All unguided harvest in the Glacier Bay subarea was assumed to have occurred in Area 2C. Charter-caught halibut taken under a Guided Angler Fish (GAF) permit from the National Marine Fisheries Service were not included in charter harvest calculations because the CSP specifies that this harvest accrues toward the commercial catch limit.

Final estimates of sport fishery yield for Areas 3B and 4 are for the charter and unguided sectors combined and are based entirely on the SWHS. Because ADF&G does not sample the sport harvest in these areas, we followed past practices of the IPHC and used the average weight of Kodiak sport harvest as a proxy for average weight in Areas 3B and 4. Specifically, we used the average weight from the unguided sector because it was unaffected by size limits. Even so, use of the Kodiak average weight may bias the yield estimates for these areas.

As has been done historically, harvest from SWHS Area R (Alaska Peninsula and Aleutian Islands south of Cape Douglas) was apportioned to IPHC Areas 3B and 4 using specific locations reported in the survey. In some years, Area R harvest estimates have included harvests for sites that are actually in Area 3A. Since 1991, the estimated harvest of Area 3A halibut included in Area 3B estimates has ranged from 0 to 728 fish per year (average = 122). In 2018, no halibut were estimated from Area 3A locations in Area R.

Results:

The 2018 Area 2C estimated sport harvest (excluding release mortality) was 127,680 fish, for a yield of 1.873 million pounds (Table 1). Charter yield represented 35% of the total. Average net weight was estimated at 14.67 lb overall and was lower for the charter sector due to size limit restrictions. Average weight was estimated from samples of 4,426 charter halibut and 4,156 unguided halibut.

The Area 3A estimated sport harvest was 242,192 fish, for a yield of 3.429 Milb (Table 1). The charter sector accounted for 55% of the total yield. Average net weight was estimated at 14.16 lb overall and was slightly lower for the charter sector. Average weight was estimated from samples of 4,647 charter halibut and 2,924 unguided halibut.

The final estimates of charter halibut yield were about 1.7% lower than last year's preliminary estimate in Area 2C and 1.3% higher than the preliminary estimate in Area 3A. These differences were largely due to errors in estimating the proportions of harvest taken through July 31, the cutoff date for using logbook data. The final estimates of unguided yield were 10.7% lower than the preliminary estimate in Area 2C and 10.8% lower in Area 3A. The preliminary estimates were derived from simple exponential time series forecasts (SAS ESM procedure) and large forecasting errors are expected due to high annual variability in the harvest time series.

The final harvest estimates for western areas were 269 halibut in Area 3B and 900 halibut in Area 4 (Table 1). Applying the Kodiak unguided average weight of 14.08 lb resulted in yield estimates of 0.004 Milb in Area 3B and 0.013 Milb in Area 4. These final estimates were up from last year's preliminary estimates of 0.002 in Area 3B and 0.011 in Area 4.

Preliminary 2019 Estimates of Harvest and Yield

Methods:

Sport charter fishery mortality for Areas 2C and 3A is based on numbers of halibut reported harvested and released in ADF&G mandatory charter logbooks. Harvest and release estimates from the SWHS are still used for all unguided fishery estimates as well as total sport fishery estimates for Areas 3B and 4. Neither complete logbook data nor SWHS estimates are available yet for the current year, and creel sampling is not designed to produce estimates of harvest. A variety of methods were used to provide preliminary estimates of the numbers of fish harvested by each sector or regulatory area.

Charter harvest for Areas 2C and 3A was projected from partial-year logbook data. Logbook data were entered and available in mid-October for most trips taken through July 31. Areas 2C and 3A are divided into several subareas closely corresponding to state management areas. Harvest data were corrected to account for late logbook submissions and other reporting errors based on past data. This adjusted the harvest in each area by less than 2%. The harvest data were then expanded by forecasting the proportion of harvest taken through July in each subarea. Forecasts and their standard errors were obtained from a simple exponential smoother using 2006-2018 logbook data as of October 12, 2019.

Unguided harvest in Areas 2C and 3A, and overall sport harvests for Areas 3B and 4 were projected from the existing time series of SWHS estimates using simple exponential smoother forecasts. Charter and unguided yield were estimated by multiplying the subarea harvest forecasts by the corresponding estimates of average weight. Average weights were estimated by applying the IPhC length-weight relationship to length measurements of harvested halibut obtained through sampling of the recreational harvest. No sampling was conducted in Areas 3B or 4 in 2019, so the Kodiak area average weight from the unguided fishery was again substituted for these areas.

Results:

The preliminary estimate of 2019 sport halibut harvest in Area 2C (excluding release mortality) was 128,608 halibut, or 1.770 Milb (Table 2). Charter harvest was estimated using a projection that 66% of the harvest was taken through the end of July. Average weight was estimated at 13.76 lb. The charter average weight was more than 9 lbs lower than the unguided average weight due to the charter fishery size limit. Average weights for Area 2C were based on length measurements of 4,158 charter halibut and 3,771 unguided halibut.

The preliminary estimate for Area 3A was 251,658 halibut, for a total sport fishery yield of 3.636 Milb (Table 2). Charter harvest was estimated using a projection that 69% of the harvest was taken through the end of July. The estimated average weights in Area 3A was 14.45 lb overall. Average weights were estimated from samples of 4,756 charter and 2,449 unguided halibut.

The preliminary harvest estimates for 2019 were 243 halibut in Area 3B and 810 halibut in Area 4. Applying the unguided average weight of 16.92 lb from Kodiak resulted in yield projections of 0.004 Milb in Area 3B and 0.014 Milb in Area 4 (Table 2). Although the levels of sport harvest are low, there is large uncertainty in the time series forecasts as well as use of the Kodiak unguided average weight as a proxy for average weight in these areas.

Final 2018 and Preliminary 2019 Estimates of Release Mortality

Methods:

Release mortality (R) was calculated in pounds net weight for each subarea of Areas 2C and 3A as:

$$R = \hat{N} \cdot DMR \cdot \hat{w}$$

where

\hat{N} = the number of fish released,

DMR = the assumed short-term discard mortality rate due to capture, handling, and release, and

\hat{w} = the estimated average net weight (in pounds) of released fish.

The numbers of halibut released (\hat{N}) in the charter sector in 2018 were based on final logbook data. The numbers of halibut released in 2019 were projected using logbook data through July 31. The projections used simple exponential forecasts of the proportion of releases through July 31 from 2006-2018 data. For the unguided fishery, and the overall sport fisheries in Areas 3B and 4, the estimated number of fish released in each subarea in 2018 was obtained from the SWHS. The projections for 2019 were simple exponential time series forecasts using previous release numbers from the SWHS.

Assumed mortality rates ($DMRs$) were 5% for Area 3A charter-caught halibut, 6% for Area 2C charter and Area 3A unguided, and 7% for Area 2C unguided halibut. These rates were developed by assuming a 3.5% mortality rate for halibut released on circle hooks and a 10% mortality rate for halibut released on all other hook types. The hook type data were collected in 2007 and 2008 in Area 2C, and every year since 2007 in Area 3A. These rates were applied to the reported number of fish released on each hook type to calculate a weighted mean mortality rate for each user group in each subarea. These weighted mean rates were then rounded up to the next whole percentage point to address uncertainty and account for possible cumulative effects of multiple recaptures. A discard mortality rate of 6% was assumed for Areas 3B and 4, as no data on hook use were collected.

For most IPHC regulatory areas, the average weights of released fish in each subarea were estimated using a logistic model of the proportion of catch retained at length, as described in the operational plan for statewide halibut estimation (see cover page for link). The model uses the length composition of the retained fish to infer the length distribution of released fish. The resulting length distributions are partitioned into U26 (<26 inch) and O26 (\geq 26 inch) components, and average weight was calculated using the IPHC length-weight relationship. The U26 and O26 separation was done for consistency with how these two size classes of waste have been handled by the IPHC and because O26 discard mortality is included in the charter allocation for areas 2C and 3A.

For the Area 2C charter fishery, additional steps were needed to estimate release mortality due to the reverse slot limits in place in 2018 and 2019. In both years, charter anglers were prohibited from harvesting fish between 38 and 80 inches in length. This required partitioning the released fish into size categories as follows: the 2018 size classes were U38 (\leq 38 inches) and O38 ($>$ 38 inches). The 2019 size classes were U38 (\leq 38 inches), 38-80, and O80 (\geq 80 inches). The proportions of fish in each size class were obtained from creel survey interviews where anglers were asked to report the numbers of released fish by size class. The average weight of released fish in the U38 size class was estimated using the model described above. The average weights of released fish in the protected slot and above the upper limit were estimated as the average weight of fish in these size ranges in 2010, the most recent year without a charter size limit.

The North Pacific Fishery Management Council's Scientific and Statistical Committee reviewed the logistic modeling approach in 2007 and concluded that it provided "reasonable" estimates of average weight given the lack of data. One problem inherent in this method is that the size distribution of released fish is truncated at the size of the smallest fish measured in the harvest sample. It is likely that some halibut are released that are smaller than the smallest halibut retained and measured. Therefore, the method may in effect underestimate the numbers of U26 fish released but overestimate their average weight. Because the model assumes that the percent of fish kept at length never exceeds 95%, it may also overestimate the numbers of O26 fish released, but probably has little effect on their average weight.

Results:

For 2018, estimated U26 release mortality was 0.005 Mlb in Area 2C, 0.012 Mlb in Area 3A, and virtually zero in Areas 3B and 4 (Table 3). Estimated O26 release mortality was 0.072 Mlb in Area 2C, with 0.060 Mlb from the charter fishery. The size class breakdown of the Area 2C charter O26 release mortality indicated that while the majority of fish released were in the length range 26-38 inches, the poundage of release mortality was greatest in the O38 range because of the higher average weight (Table 4). Estimated O26 release mortality in Area 3A was 0.027 Mlb, with 0.013 Mlb from the charter fishery (Table 3). Areas 3B and 4 each had negligible amounts of release mortality from the sport fishery.

For 2019, estimated release mortality of U26 halibut was 0.006 Mlb in Area 2C, 0.013 Mlb in Area 3A, and virtually zero in Areas 3B and 4 (Table 5). Mortality of O26 releases in Area 2C was estimated at 0.042 Mlb, with 0.031 Mlb from the charter fishery. The size class breakdown of the Area 2C charter O26 release mortality indicated that while the majority of fish released were in the length range 26-38 inches, the poundage of release mortality was greatest in the 38-80 inch range because of the higher average weight (Table 4). Mortality of O26 releases in Area 3A was 0.033 Mlb, with most (0.020 Mlb) coming from the unguided fishery (Table 5). The O26 release mortality was negligible in Area 3B and Area 4.

The 2018 total sport fishery removals, including harvest and all sizes of release mortality, added up to 1.950 Mlb in Area 2C and 3.468 Mlb in Area 3A. Release mortality made up 3.9% of all Area 2C removals and 1.1% of Area 3A removals. For 2019, the preliminary estimates of total sport removals are 1.818 Mlb in Area 2C and 3.682 Mlb in Area 3A. Release mortality accounted for 2.6% of Area 2C removals and 1.2% of Area 3A removals in 2018.

Sport Fishery Yield Prior to the Mean IPHC Survey Dates in 2018 (Areas 2C and 3A only)

This information is provided to aid the IPHC's adjustment to survey CPUE that is used to apportion estimated exploitable biomass among regulatory areas. The mean survey dates for 2018 were July 20 in Area 2C and June 29 in Area 3A.

Methods:

The proportions of harvest prior to the mean survey date were calculated separately for the charter and unguided sectors. For the charter sector, the proportion of harvest taken prior to the mean survey date in 2018 was obtained from logbook harvest data. For the unguided sector, the proportions were calculated based on harvest reported in dockside interviews. These proportions were calculated separately for each subarea of Area 2C and 3A and weighted by the 2018 final estimated harvests in each subarea to derive the overall proportions. The total sport yield taken prior to the mean survey date was calculated by multiplying the charter and unguided proportions by their respective final or projected yields and summing.

Results:

In 2018, an estimated 0.930 Mlb of halibut were taken by the sport fishery in Area 2C prior to July 20, and an estimated 0.880 Mlb were taken in Area 3A prior to June 29 (Table 6).

Table 1. Final estimates of the 2018 sport halibut harvest (numbers of fish), average net weight (pounds), and yield (millions of pounds net weight) in Areas 2C, 3A, 3B, and 4. “NA” indicates no estimate is available.

IPHC Area	Sector	Harvest (no. fish)	Average Net Wt. (lb)	Yield (Mlb)	95% CI for Yield (Mlb)
Area 2C	Charter	69,992	9.37	0.656	0.618 – 0.694
	Unguided	57,688	21.09	1.216	1.079 – 1.354
	Total	127,680	14.67	1.873	1.730 – 2.015
Area 3A	Charter	136,312	13.75	1.874	1.761 – 1.986
	Unguided	105,880	14.69	1.555	1.369 – 1.742
	Total	242,192	14.16	3.429	3.211 – 3.647
Area 3B	Total	269	14.08 ^a	0.004	NA
Area 4	Total	900	14.08 ^a	0.013	NA

^a – No size data were available from Areas 3B and 4, so the unguided average weight from Kodiak was substituted.

Table 2. Preliminary estimates of the 2019 sport halibut harvest (numbers of fish), average net weight (pounds), and yield (millions of pounds net weight) in Areas 2C, 3A, 3B, and 4. “NA” indicates no estimate is available.

IPHC Area	Sector	Harvest (no. fish)	Average Net Wt. (lb)	Yield (Mlb)	95% CI for Yield (Mlb)
Area 2C	Charter	67,529	9.39	0.634	0.606 – 0.662
	Unguided	61,079	18.59	1.136	0.903 – 1.368
	Total	128,608	13.76	1.770	1.535 – 2.004
Area 3A	Charter	137,731	14.52	2.000	1.846 – 2.153
	Unguided	113,927	14.36	1.636	1.343 – 1.930
	Total	251,658	14.45	3.636	3.305 – 3.968
Area 3B	Total	243	16.92 ^a	0.004	NA
Area 4	Total	810	16.92 ^a	0.014	NA

^a – No size data were available from Areas 3B and 4, so the unguided average weight from Kodiak was substituted.

Table 3. Final estimates of release mortality for sport fisheries in Areas 2C, 3A, 3B, and 4 in 2018. Some columns may not appear to add correctly due to rounding.

IPHC Area	Size Class	Sector	Estimated No. Halibut Released	Assumed Mortality Rate	Number Released that Died	Estimated Average Net Weight (lb)	Release Mortality (Mlb)
Area 2C	U26	Charter	8,118	6.0%	487	3.69	0.002
		Unguided	12,838	7.0%	899	3.57	0.003
		Total	20,957		1,386	3.61	0.005
	O26	Charter	29,664	6.0%	1,780	33.56	0.060
		Unguided	15,660	7.0%	1,096	10.74	0.012
		Total	45,324		2,876	24.86	0.072
Area 3A	U26	Charter	33,991	5.0%	1,700	3.54	0.006
		Unguided	29,582	6.0%	1,775	3.22	0.006
		Total	63,573		3,474	3.38	0.012
	O26	Charter	24,281	5.0%	1,214	10.28	0.013
		Unguided	26,261	6.0%	1,576	9.11	0.014
		Total	50,542		2,790	9.62	0.027
Area 3B	U26	Total	150	6.0%	9	3.75	0.000
	O26	Total	363	6.0%	22	8.84	0.000
Area 4	U26	Total	107	6.0%	6	3.56	0.000
	O26	Total	181	6.0%	11	9.48	0.000

Table 4. Breakdown of Area 2C estimates of O26 charter release mortality by size class for 2018 (final) and 2019 (preliminary). Some columns may not appear to add correctly due to rounding.

Year	Size Class (inches)	Estimated No. Halibut Released	Assumed Mortality Rate	Number Released that Died	Estimated Average Net Weight (lb)	Release Mortality (Mlb)
2018	O26U38	13,176	6.0%	791	8.98	0.007
	O38	16,487	6.0%	989	53.21	0.053
	Total O26	29,664	6.0%	1,780	33.56	0.060
2019	O26U38	15,987	6.0%	959	8.41	0.008
	O38U80	6,934	6.0%	416	47.84	0.020
	O80	227	6.0%	14	244.70	0.003
	Total O26	23,147	6.0%	1,389	22.53	0.031

Table 5. Preliminary estimates of release mortality for sport fisheries in Areas 2C, 3A, 3B, and 4 in 2019. Some columns may not appear to add correctly due to rounding.

IPHC Area	Size Class	Sector	Estimated No. Halibut Released	Assumed Mortality Rate	Number Released that Died	Estimated Average Net Weight (lb)	Release Mortality (Mlb)
Area 2C	U26	Charter	9,015	6.0%	541	3.71	0.002
		Unguided	14,307	7.0%	1,002	3.69	0.004
		Total	23,323		1,542	3.69	0.006
	O26	Charter	23,147	6.0%	1,389	22.53	0.031
		Unguided	15,768	7.0%	1,104	9.78	0.011
		Total	38,915		2,493	16.88	0.042
Area 3A	U26	Charter	31,513	5.0%	1,576	3.59	0.006
		Unguided	37,043	6.0%	2,223	3.46	0.008
		Total	68,018		3,798	3.51	0.013
	O26	Charter	23,471	5.0%	1,174	10.75	0.013
		Unguided	37,546	6.0%	2,253	8.88	0.020
		Total	61,018		3,426	9.52	0.033
Area 3B	U26	Total	62	6.0%	4	4.47	0.000
	O26	Total	285	6.0%	17	9.88	0.000
Area 4	U26	Total	184	6.0%	11	4.28	0.000
	O26	Total	356	6.0%	21	8.78	0.000

Table 6. Final estimated sport harvest prior to the mean IPHC survey dates in 2018 in Areas 2C and 3A.

Area	Mean Survey Date	Charter		Unguided		Total	
		Percent	Harvest (Mlb)	Percent	Harvest (Mlb)	Percent	Harvest (Mlb)
2C	July 20	51.3%	0.337	48.8%	0.593	49.7%	0.930
3A	June 29	28.8%	0.539	21.9%	0.340	25.7%	0.880