



**REGULATORY PROPOSAL 2020**

**TITLE: CHARTER MANAGEMENT MEASURES IN IPHC REGULATORY AREAS 2C AND 3A**

**SUBMITTED BY:**  
**UNITED STATES OF AMERICA**  
**NOAA-FISHERIES**  
**AFFILIATION: NMFS, ALASKA REGION**  
**USA**

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***Explanatory Memorandum***

All Regulatory Areas  All Alaska Regulatory Areas  All U.S. Regulatory Areas

2A  2B  2C  3A  3B  4A  4B  4C  4D  4E

The North Pacific Fishery Management Council (NPFMC) recommended the following management measures for charter Pacific halibut fisheries in IPHC Regulatory Areas 2C and 3A for application in 2020, in order to achieve the charter Pacific halibut allocation under the NPFMC Halibut Catch Sharing Plan:

**Area 2C**

A progression of management measures in the following order:

1. If the Area 2C catch limit is from 0.772 to 1.001 million pounds, it is the intention of the NPFMC to maintain an upper size limit of halibut at O80 and a lower size limit of halibut at or above U40. If possible under the catch limit, the U40 size limit will be adjusted upward until the catch limit is achieved (Table 6 of the analysis).
2. If the catch limit in Area 2C is from 0.658 to 0.771 million pounds, the NPFMC recommends maintaining the U40/O80 size limit, then progressively reducing the number of days when halibut may be retained by establishing closures on Wednesdays, beginning on 9 September and working consecutively toward the beginning of the season with a maximum of all Wednesdays closed (Table 10-A1 of the analysis).
3. If the catch limit in Area 2C is from 0.646 to 0.656 million pounds, the NPFMC recommends a U40/O80 size limit, an annual limit of 4 halibut for all charter anglers, and a closure of between fourteen and all Wednesdays, beginning on 9 September and working consecutively toward the beginning of the season (Table 14-A1 of the analysis).
4. If the catch limit in Area 2C is from 0.636 to 0.645 million pounds, the NPFMC recommends a U41/O80 size limit, an annual limit of 3 halibut for all charter anglers, and a closure of between fourteen and all Wednesdays, beginning on 9 September and working consecutively toward the beginning of the season (Table 16-A1 of the analysis). If the catch

limit in Area 2C is from 0.615 to 0.636 million pounds, the NPFMC recommends a U40/O80 size limit, an annual limit of 3 halibut for all charter anglers, and a closure of between thirteen and all Wednesdays, beginning on 9 September and working consecutively toward the beginning of the season (Table 16-A1 of the analysis).

5. If the catch limit in Area 2C is less than 0.615 million pounds, the NPFMC recommends a closure of all Wednesdays for the entire season, an annual limit of 3 halibut for all charter anglers, and an adjustment of the lower size limit until the catch limit is achieved. The expected harvest under these measures with a lower size limit of U39 is 0.599 million pounds (Table 16-A1 of the analysis).

If an annual limit is adopted in Area 2C, implement a requirement for charter anglers to record, immediately upon retaining a halibut, the date, location (IPHC area), and species (halibut) on their harvest record, consistent with the current reporting requirement in Area 3A.

### Area 3A

All allocations shown below include, unless otherwise specified: a daily bag limit of 2 halibut; an annual limit of 4 halibut per charter angler; Wednesdays closed to halibut retention all year; 1 trip per halibut charter vessel per day; and 1 trip per charter halibut permit per day.

- If the allocation is less than 2.014 Mlb but greater than or equal to 1.695 Mlb:
  - a daily bag limit of 2 halibut, with one fish of any size, and one fish less than or equal to 26 inches;
  - adjust the number of Tuesdays closed to halibut retention, such that the projected removals achieve the allocation (Table 1, page 15 of the Supplemental Analysis). The Tuesdays closed to halibut retention are specified in Table 22, pg. 38 of the December 3 analysis.
- If the allocation is less than 1.695 Mlb, but greater than or equal to 1.588 Mlb (proposed to achieve allocation for status quo TCEY = 1.66 Mlb):
  - a daily bag limit of 2 halibut with one fish of any size and one fish less than or equal to 26 inches;
  - all Tuesdays closed to halibut retention;
  - adjust the number of Thursdays closed to halibut retention, to a maximum of four Thursday closures, such that the projected removals achieve the allocation (Table 5, page 19 of the January 23 Supplemental Analysis; Thursdays closed to halibut retention are specified in Table 4; page 18 of the Supplemental Analysis.
- If the allocation is less than 1.588 Mlb (proposed to achieve allocation between 1.588 Mlb and reference TCEY = 1.24 Mlb):

All Tuesdays are closed to halibut retention;

a daily bag limit of 1 halibut, with a reverse (protected) slot limit. The upper limit of the reverse slot limit is fixed at 80 inches, and the lower end of the reverse slot limit is adjusted such that the projected removals achieve the allocation – beginning at 58 inches (Appendix Table A5-o, page 75, last column, of the Supplemental Analysis).

The NPFMC selected these management measures at its January 2020 meeting, following review of analyses prepared by the Alaska Department of Fish and Game (ADFG) for proposed management measures for 2020 and after receiving input from the Charter Halibut Management Committee, which includes stakeholder representatives from both Areas 2C and 3A.

ADFG developed two sets of analyses to evaluate the potential effects of the management measures. They are available on the NPFMC website at the following addresses:

December 3 analysis:

<https://meetings.npfmc.org/CommentReview/DownloadFile?p=73dcb335-e660-4bd0-9903-b9c126884484.pdf&fileName=C3%20Charter%20Halibut%20Management%20Measures%20Analysis.pdf>

The January 23 Supplemental Analysis:

<https://meetings.npfmc.org/CommentReview/DownloadFile?p=24da17e2-6181-415e-85c2-674888755867.pdf&fileName=C1%20Supplemental%20Analyses%20of%20Charter%20Mgmt%20Options%20for%203A%202020.pdf>

The minutes from the December and January meetings of the Charter Halibut Management Committee are attached for reference.

### ***Suggested Regulatory Language***

(Note that in the suggested regulatory text below, the allocation to each charter sector has been deleted, as that information is found elsewhere in the IPHC regulations.)

#### **29. Sport Fishing for Pacific Halibut—IPHC Regulatory Areas 2C, 3A, 3B, 4A, 4B, 4C, 4D, 4E**

- (1) ...
- (2) For guided sport fishing (as referred to in 50 CFR 300.65) in IPHC Regulatory Area 2C:
  - (a) No person on board a charter vessel (as referred to in 50 CFR 300.65) shall catch and retain more than one Pacific halibut per calendar day.
  - (b) No person on board a charter vessel (as referred to in 50 CFR 300.65) shall catch and retain any Pacific halibut that with head on is greater than **38 inches (96.5 cm)** [may be adjusted according to Table 15 in the ADF&G analysis of

proposed harvest regulations for 2020 to bring the projected harvest within the Area 3A allocation] and less than 80 inches (203.2 cm) as measured in a straight line, passing over the pectoral fin from the tip of the lower jaw with mouth closed, to the extreme end of the middle of the tail.

- (c) [may be added according to the progressive management measures described in the NPFMC recommendation] No person on board a charter vessel may catch and retain Pacific halibut on the following [any] Wednesdays: [day of the week closures will be adjusted accordingly].
- (d) [may be added according to the progressive management measures described in the NPFMC recommendation] Charter vessel anglers may catch and retain no more than four (4) [or potentially adjusted to three (3)] Pacific halibut per calendar year on board charter vessels in IPHC Regulatory Area 2C. Pacific halibut that are retained as GAF, retained while on a charter vessel fishing trip in other Commission regulatory areas, or retained while fishing without the services of a guide do not accrue toward the 4-fish [or potentially 3-fish] annual limit for Regulatory Area 2C. For purposes of enforcing the annual limit, each angler must:
  - (1) maintain a nontransferable harvest record in the angler's possession if retaining a Pacific halibut for which an annual limit has been established. Such harvest record must be maintained either on the back of the angler's State of Alaska sport fishing license or on a Sport Fishing Harvest Record Card obtained, without charge, from ADFG offices, the ADFG website, or fishing license vendors; and
  - (2) immediately upon retaining a Pacific halibut for which an annual limit has been established, record the date, location (IPHC Regulatory Area 2C), and species of the catch (Pacific halibut), in ink, on the harvest record; and
  - (3) record the information required by paragraph 2(d)(2) on any duplicate or additional sport fishing license issued to the angler or any duplicate or additional Sport Fishing Harvest Record Card obtained by the angler for all Pacific halibut previously retained during that year that were subject to the harvest record reporting requirements of this section; and
  - (4) carry the harvest record on his or her person while fishing for Pacific halibut.

- (3) For guided sport fishing (as referred to in 50 CFR 300.65) in IPHC Regulatory Area 3A:
  - (a) No person on board a charter vessel (as referred to in 50 CFR 300.65) shall catch and retain more than two [to be adjusted if the allocation is less than 1.588 million pounds] Pacific halibut per calendar day.
  - (b) ~~At least one of the retained Pacific halibut must have a head-on length of no more than 28 inches (71.1 cm) as measured in a straight line, passing over the pectoral fin from the tip of the lower jaw with mouth closed, to the extreme end of the middle of the tail. If a person sport fishing on a charter vessel in IPHC Regulatory Area 3A retains only one Pacific halibut in a calendar day, that Pacific halibut may be of any length.~~ [to be adjusted to specify at least one of two Pacific halibut must be no more than 26 inches (66 cm), or to specify a bag limit of one Pacific halibut with a slot limit indicated in Appendix Table A5-o of the Supplemental Analysis, such that the projected Area 3A harvest is within the allocation]
  - (c) A charter halibut permit (as referred to in 50 CFR 300.67) may only be used for one charter vessel fishing trip in which Pacific halibut are caught and retained per calendar day. A charter vessel fishing trip is defined at 50 CFR 300.61 as the time period between the first deployment of fishing gear into the water by a charter vessel angler (as defined at 50 CFR 300.61) and the offloading of one or more charter vessel anglers or any Pacific halibut from that vessel. For purposes of this trip limit, a charter vessel fishing trip ends at 2359 (Alaska local time) on the same calendar day that the fishing trip began, or when any anglers or Pacific halibut are offloaded, whichever comes first.
  - (d) A charter vessel on which one or more anglers catch and retain Pacific halibut may only make one charter vessel fishing trip per calendar day. A charter vessel fishing trip is defined at 50 CFR 300.61 as the time period between the first deployment of fishing gear into the water by a charter vessel angler (as defined at 50 CFR 300.61) and the offloading of one or more charter vessel anglers or any Pacific halibut from that vessel. For purposes of this trip limit, a charter vessel fishing trip ends at 2359 (Alaska local time) on the same calendar day that the fishing trip began, or when any anglers or Pacific halibut are offloaded, whichever comes first.
  - (e) No person on board a charter vessel may catch and retain Pacific halibut on any Wednesday, or on the following Tuesdays: [to be adjusted for Tuesday and potentially Wednesday closures, according to Tables 1 and 5 of the ADF&G Supplemental analysis, to bring the projected harvest within the Area 3A allocation].

- (f) Charter vessel anglers may catch and retain no more than four (4) Pacific halibut per calendar year on board charter vessels in IPHC Regulatory Area 3A. Pacific halibut that are retained as GAF, retained while on a charter vessel fishing trip in other Commission regulatory areas, or retained while fishing without the services of a guide do not accrue toward the 4-fish annual limit. For purposes of enforcing the annual limit, each angler must:
- (1) maintain a nontransferable harvest record in the angler's possession if retaining a Pacific halibut for which an annual limit has been established. Such harvest record must be maintained either on the back of the angler's State of Alaska sport fishing license or on a Sport Fishing Harvest Record Card obtained, without charge, from ADFG offices, the ADFG website, or fishing license vendors; and
  - (2) immediately upon retaining a Pacific halibut for which an annual limit has been established, record the date, location (IPHC Regulatory Area 3A), and species of the catch (Pacific halibut), in ink, on the harvest record; and
  - (3) record the information required by paragraph 3(g)(2) on any duplicate or additional sport fishing license issued to the angler or any duplicate or additional Sport Fishing Harvest Record Card obtained by the angler for all Pacific halibut previously retained during that year that were subject to the harvest record reporting requirements of this section; and
  - (4) carry the harvest record on his or her person while fishing for Pacific halibut.

## **Attachments**

Attachment 1 Charter Halibut Management Committee Report of 3 December 2019

Attachment 2 Charter Halibut Management Committee Report of 23 January 2020



## Charter Halibut Management Committee

### REPORT

10:30 AM to 3:30 PM | December 3, 2019 | Anchorage, AK

The Charter Halibut Management Committee met in Anchorage, AK on December 3, 2019 from 10:30 AM to 3:30 PM to review analysis of potential charter halibut management measures and recommend 2020 measures for implementation in IPHC Areas 2C and 3A. The Committee also received a presentation on the initial review draft of an analysis on unguided halibut rental boat registration (Council Agenda Item C-8) and subsequently provided comments and recommendations for the Council to consider.

#### Committee Members in attendance:

Andy Mezirow, Chairman  
Steve Zernia  
Matt Kopec  
Daniel Donich

Stan Malcolm  
Kent Huff  
Seth Bone  
Denise May

Mike Flores  
Richard Yamada  
Forrest Braden  
Sam Cunningham (staff)

#### Others in attendance (public affiliation):

Rachel Baker (ADF&G)  
Sarah Webster (ADF&G)  
Rick Green (ADF&G)  
Jim Hasbrouck (ADF&G)  
Bob Powers (ADF&G)  
Baine Etherton (ADF&G)  
Stephen Keith (IPHC)  
Kate Haapala (NPFMC)  
Doug Duncan (NMFS)  
Alicia Miller (NMFS)  
Kurt Iverson (NMFS)

Bill Tweit (NPFMC)  
Tom Gemmell  
Mel Erickson  
Kenji Yamada  
Tim Comer  
Murtie Comer  
Ernie Kirby  
Clay Duda  
Billy Hayden  
Daniel Hayden  
Ben Martin

Lynn Keogh  
Leslie Pemberton  
McKinley Kellogg  
Nadra Angerman  
Jeff Wedekind  
Mark Warner  
Ken Federico  
Aaron Mahoney  
Wally Martin  
Theresa Peterson  
Duncan Fields

### 2020 Charter Halibut Management Measures

Sarah Webster (ADF&G) presented results from the analysis of the charter halibut management measure options for 2020 in Areas 2C and 3A that were defined at the Committee's October 2019 meeting.

**Area 2C** representatives support a reverse slot limit with day closures and annual bag limits added as measures *as needed* to maintain at least a 40" maximum size on the low end of the slot. The Committee felt that 40" represents fairness to the needs of all business models in view of historical participation in the halibut fishery. Based on the analysis, the Committee **recommends** the following management measures:

#### In Area 2C – A progression of management measures in the following order:

- 1. A reverse slot with an upper limit fixed at O80, and a lower limit raised until the allocation is reached, but no lower than U40;**

2. **If the allocation is insufficient to maintain at least a U40 on the lower limit, add Wednesday closures beginning on September 9th and work consecutively toward the beginning of the season until a lower limit of U40 is reached;**
3. **If a lower limit of U40 can't be reached after closing all Wednesdays, add a 4-fish annual limit in addition to closing all Wednesdays, and use any unused allocation to increase the lower limit above U40 until the allocation is reached;**
4. **If a lower limit of U40 can't be reached by closing all Wednesdays and adding a 4-fish annual limit, reduce the annual limit to 3 fish in addition to closing all Wednesdays, and use any unused allocation to increase the lower limit above U40 until the allocation is reached.**

Committee members felt that progressing in an additive manner from the U40"/O80" reverse slot to day closures to annual limits – in that order – is the most equitable way to distribute reductions across business models. The Committee notes that Area 2C has been under its allocation in four of six years since the implementation of the Catch Sharing Plan (CSP) while using a reverse slot limit. The total net underage during that 2014-2019 period is 574,000 lbs. (cumulative 30%)<sup>1</sup>. The Committee points out that modeled catch may be biased high when projecting harvest on reverse slots with a lower maximum size limit less than U44". Because the reverse slot remains the underlying basis of the harvest measures being considered, the Committee believes it could be appropriate to consider a less restrictive size limit even if it falls slightly above the charter allocation.

For **Area 3A**, the analysis revealed that none of the options defined in October would result in meeting the reference level of halibut removals that was specified at the IPHC interim meeting in November. All analyzed options for management measures are projected to result in more removals than the range of TCEY levels that are probable to be selected for the area at the IPHC annual meeting in February 2020. As a result of this unprecedented situation, the Committee has made both a recommendation and a request. The **recommendation** is:

**In Area 3A – Limit charter harvest to the status quo TCEY (within 2%). Maintain status quo management measures, except:**

1. **Closure of Tuesdays throughout the year;**
2. **Include second fish of 26" or less.**

Committee members representing Area 3A stated that reductions beyond the management measures recommended above would have severe adverse impacts on the charter sector as well as local tourism and associated economies in the area. Given the gravity of the decision on the form that further reductions might take, the Committee feels it necessary to see an analysis of the options that could actually meet the reference TCEY. In other words, the Committee desires to have a voice in whether further reductions are achieved by day closures, length restrictions, or a combination – and what that combination might be. The Committee **requests** that ADF&G staff analyze a wider range of management measure options and that they be allowed to make a recommendation based on that analysis in the form of a publicly noticed teleconference taking place prior to the Council's February 2020 meeting and the IPHC's Annual Meeting. If the Committee is not able to review options that could achieve the reference TCEY, the members are concerned that they would be ceding the decision on the *mechanism* to reduce removals to the IPHC.

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<sup>1</sup> Area 2C overage/underage by year: 2014 +9%; 2015 -4%; 2016 -7%; 2017 +3%; 2018 -12%; 2019 -19%.

### **Other points of discussion:**

The Committee noted the different types of impacts that result from more restrictive size limits, bag limits, and day closures. The key distinction that was highlighted was between size/bag limits and day closures. Day closures – especially as the number of closed days per week increases – directly affect operators’ ability to hire and retain captains and crew. Changes to size and bag limits affect operators’ ability to market trips to clients (recognizing that reduced demand could indirectly affect hiring and retention).

The Committee is concerned about the magnitude of year-on-year fluctuation in TCEY and is interested in dialogue with IPHC about options to limit annual variation. Uncertainty about the following year’s management measures are of particular concern to the charter sector because the nature of its business is to book clients far in advance, often for the following year. The inability to confidently assure clients of bag limits or open days in the course of a multi-day booking is an impediment to marketing and client retention. Possible methods to limit variation might include phasing in restrictions over several years or relying on rolling averages of multiple years to determine allowable removals.

The Area 3A representatives requested that the Council consider including all user groups (charter, unguided, commercial, and trawl bycatch) in the CSP when it conducts the upcoming CSP review. They also request a review of allocations apportioned to each sector. This request reflects the notion that the charter and commercial sectors have experienced catch reductions as a result of lower TCEY while unguided and trawl users have not. These minutes do not imply that the Area 2C representatives agree or disagree with this request, as they did not comment and there was not an attempt to make a consensus recommendation.

### **Public Comment on 2020 Management Measures:**

The Committee received public comment from Mel Erickson, Ben Martin, Jeff Wedekind, Clay Duda, and Ernie Kirby.

### **Review of C-8 Unguided Halibut Rental Boat Registration**

The Committee received an overview of the initial review analysis from Kurt Iverson (NMFS). Questions asked by the Committee addressed the lack of information available on the demographic makeup of the rental boat customer base and the inability to draw conclusions about whether and to what extent the expansion of unguided rental boat catch could impact other sectors.

**The Committee supported moving forward with Alternative 2 (require registration) without objection.** Members noted that a registration requirement will enable the gathering of information that is necessary to manage unguided rental boat use from an informed perspective. However, it was acknowledged that implementing a registration rule and then collecting the data is a process that will not bear fruit for several years, and will not collect information on unguided catch and effort. The Committee anticipates that a registration action will signal Council consideration of limiting rental boats in the future, and thus there may be a rush for current charter operators and other vessel owners to register their vessels as rental boats. The Committee discussed the two Elements under Alternative 2 (Elem. 1: 2C only or 2C & 3A; Elem. 2: register annually, every 3 years, or every 5 years) but did not vote or express preferences at this time. The Committee noted that it is difficult to know whether to include Area 3A without knowing the extent of unguided rental activity on an area basis. It was noted that requiring registration less frequently could reduce administrative costs.



**The Committee did not support moving forward with Alternative 3 (align unguided size/bag limits with charter limits) at the present time.** The primary reason given was that it is premature to complicate management of recreational halibut when the extent of the impact that unguided rental boat catch is having and where it is occurring is not yet known. The Committee did share the perception that the types of vessels being offered as rentals are becoming larger and better able to access deep-water species like halibut. Moreover, the Committee felt that a period of uncertainty about the direction of the halibut stock and the size of the charter allocation under the CSP is not a good time to change bag limits. The Committee felt that subjecting a new user group (unguided rental boat anglers) to a new set of regulations would further fracture the recreational angling sector to address an activity that may or may not be a problem, or might only be a problem in certain areas. Moreover, regulating the rental boat sector may incentivize persons or businesses to develop new strategies to avoid charter angling restrictions, such as group ownership of vessels. Finally, the Committee discussed the rental boat issue as a byproduct of the different angling restrictions between the charter sector and unguided sector. Some committee members indicated that particularly during periods of stock decline, the entire unguided sector should bear some of the responsibility for halibut conservation.



## Charter Halibut Management Committee REPORT

January 23, 2020 Teleconference

*The committee met via teleconference to review the supplemental analysis of charter halibut management measures for Area 3A and to select management measures for potential application in 2020.*

Committee Members in attendance:

Andy Mezirow (Chairman)	Denise May	Steve Zernia
Daniel Donich	Richard Yamada	Forrest Braden
Matt Kopec	Mike Flores	

Members absent: Kent Huff, Stan Malcolm

Others in attendance:

Steve Keith	Gabe Linneker	Ton Gemmell
Paddy O'Donnell	Tom Taube	Baine Atherton
Heather Mann	Jim Martin	Alicia Miller
Bob Candopoulos	Kurt Iverson	

### Supplemental analysis of management measures for Area 3A

Sarah Webster (ADF&G) summarized the supplemental analysis of management options for the Area 3A charter halibut fisheries for 2020. In December 2019, the committee requested, and the Council authorized, analysis of additional measures for Area 3A that could achieve the reference (1.24 million pounds) or status quo (1.66 million pounds) TCEY identified by the IPHC at the interim annual meeting in November 2019. The ADF&G analyzed the following additional measures for potential implementation in Area 3A in 2020:

1. Maximum size limit of one fish combined with Tuesday closures
2. Status quo with all Tuesdays closed and additional days closed combined with maximum size limits
3. Maximum size limit on one fish combined with annual limits of 2 – 4 fish
4. Maximum size limit on one fish combined with annual limits of 2 – 3 fish and Tuesday closures
5. Reverse slot limit combined with a maximum size limit and Tuesday closures
6. Reverse slot limit combined with a maximum size limit of 26 inches and additional closure dates
7. One-fish bag limit, no size limit
8. One-fish bag limit with reverse slot limit combined with Tuesday closures
9. Status quo with all days of the week open and a season closure prior to May 16 or June 1 and after July 31

After the presentation, committee members asked clarifying questions and discussed options for recommending management measures. Mr. Steve Keith (IPHC) suggested, as normal, that the committee should recommend a range of alternatives to address the potential range of FCEY allocations that the commission might make. Committee members discussed the options for regulations, including the range

of size limits, closures on additional days of the week, adjusting the length of the charter halibut fishing season, and potentially restricting participation in charter fisheries during times of low halibut abundance to limit latent capacity in the fishery.

After discussion the following motion was made:

**The 3A Charter Halibut Committee issues the following recommendation to the North Pacific Fisheries Management Council:**

**At the Status Quo TCEY level with a charter allocation of 1.66 m/lb.**

**Maintain Status quo management measures except the following:**

- Closure of Tuesdays all year.
- Include second fish of 26" or less.
- Closure of 1 Thursday for a total harvest of 1.666 m/lb

**If the Charter allocation is less than 1.66 m/lb:**

- Close additional Thursdays up to a maximum of 4 closed Thursdays on July 16, July 23, July 30, and August 6 for a total Harvest of 1.588 m/lb

**If the Charter allocation is less than 1.588 m/lb:**

- Include closure of all Tuesdays
- Institute a one fish bag limit with a reverse slot limit:
- U58 O80 = 1.573 m/lb
- Reduce the lower limit as necessary to achieve the harvest goal down to a max.
- U38 O80 = 1.239 m/lb

**If the Charter allocation is above the Status Quo TCEY, reduce the number of closed Tuesdays to reach the corresponding allocation level. Second Halibut of 26".**

After discussion the committee also approved the following statement to accompany the recommendation to the Council:

**Committee Statement:**

**In the eyes of the Charter Halibut Committee and a majority of the charter industry we view the one halibut reverse slot limit as the "nuclear option" that would have disastrous consequences to the 3A charter industry and coastal communities in Southcentral Alaska. Therefore, though we have made recommendations below this level to fulfill our obligation as a committee, we cannot willingly accept a harvest below 1.588 m/lb. We have heard from many local businesses that closing the halibut fishery beyond 2 days per week or instituting an entirely new management scenario (e.g., reverse slot limit) will force closures of some charter businesses as well as starving many support related businesses such as launch services, restaurants, processors, boat repair facilities, and others.**

**Clarification of IPHC Regulatory Proposal for Area 2C**

The committee reviewed NOAA's regulatory proposal for charter management measures in Area 2C to consider language suggested for Area 2C to clarify the committee's and the Council's intention for Area 2C management measures. After review, the committee concurred with NOAA's suggested regulatory language, although representatives of the Area 2C committee members expressed that they believe that the measures suggested for Area 2C are the maximum restrictions that the industry can accept.

*Statement from 2C representatives*

**NPFMC Charter Halibut Management Committee 2C Hardship Note**

Area 2C representatives of the committee note that, especially under low abundance, CSP sport allocations do not adequately fund the 2C charter industry.

Halibut are essential to the fishing opportunity Southeast businesses offer to attract and keep customers. As a direct result of restrictive guided halibut limits, 2C operators are now losing repeat business and struggling to interest new business. Effects are magnified in front season bookings, where halibut are one of few target fish available.

Southeast guided anglers are now reduced to one halibut per day under 38", and face season-long Wednesday closures combined with annual limits to maintain a similar size fish for 2020. The 2C reverse slot has led to an average charter halibut of 31" (9.6 net pounds)- an inch below the legal-sized retainable fish in the commercial fleet. It has also triggered a spike in releases, resulting in deductions in allocation up to 8% or 60,000 pounds. (3A release mortality runs 1%)

Council review of the CSP is scheduled for 2021. We ask Council members to reexamine allocative relationships between sectors, especially with respect to viability thresholds of the charter fleet at low abundance.

The RQE offers no immediate allocation relief, and at best, slow recovery over an extended period when finally implemented.

Respectfully,

2C CHMC members:

Richard Yamada, Seth Bone, Stan Malcom, Kent Huff, Forrest Braden