



National Report:

United State of America

PREPARED BY: NOAA FISHERIES (23 DECEMBER 2020; 11 JANUARY 2021)

PURPOSE

To provide an overview of the fisheries and removals of Pacific halibut during 2020 from the IPHC Convention waters and the national waters of the United States of America.

West Coast of the United States of America – IPHC Regulatory Area 2A

The 2020 Area 2A Pacific halibut (halibut) catch limit of 1,500,000 pounds was allocated according to the 2020 Catch Sharing Plan (CSP) for Area 2A 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 |

All weights in this report are net weight (gutted, head-off, and without ice and slime), unless otherwise noted. The structure of each fishery and the resulting harvests are described below.

Best estimates of halibut catch for Area 2A indicate harvest of 743,554 pounds of the non-tribal total quota and 488,915 pounds of the tribal quota, with a total harvest estimate of 1,232,469 pounds, or 82%, of the 1,500,000 pound catch limit. A summary of all Area 2A quotas and preliminary harvest estimates for 2020 is attached in Table 2 of this document.

Non-Tribal Commercial Fisheries

A quota of 299,325 pounds (30.7% of the non-tribal share) was allocated to two fishery components:

- 1) a directed longline fishery targeting halibut south of Point Chehalis, WA; and
- 2) an incidental catch fishery in the salmon troll fisheries off Washington, Oregon, and California.

A quota of 70,000 pounds was allocated to an incidental catch fishery in the sablefish primary fishery for vessels using longline gear north of Point Chehalis, WA. This allowance for the sablefish primary fishery is taken from the portion of the Washington

sport allocation that is above 214,110 pounds, as long as the amount is at least 10,000 pounds.

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 fishery was confined to the area south of Point Chehalis, WA (46°53.30' N. lat.). In addition, there are closed areas along the coast defined by depth contours. Between the U.S./Canada border and 40°10' N. lat. the western boundary of the closed area is defined by a line approximating the 100 fm depth contour. The eastern boundary of the closed area is defined as follows: Between the U.S./Canada border and 46°16' N. lat., the boundary is the shoreline. Between 46°16' N. lat. and 40°10' N. lat. the boundary is the 30 fm depth contour. Fishing periods were 58 hours in duration every other week, starting Monday, June 22. In 2020, the fishery was open for five fishing periods: June 22-24, July 6-8, July 20-22, August 3-5, and August 17-19. A 32 inch minimum size limit with the head on was in effect for all openings. Vessel landing limits per fishing period based on vessel length were imposed by IPHC during all openings as shown in Table 1. Vessels choosing to operate in this fishery could not land halibut as incidental catch in the salmon troll fishery, nor operate in the recreational fishery.

Table 1. 2020 fishing period limits (dressed weight, head-on with ice and slime, in pounds per vessel) by vessel size.

| Vessel Class/Size (ft) | | Jun 22-24 | Jul 6-8 | Jul 20-22 | Aug 3-5 | Aug 17-19 |
|------------------------|---|-----------|---------|-----------|---------|-----------|
| 0-25 | A | 905 | 1,810 | 2,263 | 2,263 | 905 |
| 26-30 | B | 905 | 1,810 | 2,263 | 2,263 | 905 |
| 31-35 | C | 905 | 1,810 | 2,263 | 2,263 | 905 |
| 36-40 | D | 1,364 | 2,728 | 3,410 | 3,410 | 1,364 |
| 41-45 | E | 1,364 | 2,728 | 3,410 | 3,410 | 1,364 |
| 46-50 | F | 1,818 | 3,636 | 4,545 | 4,545 | 1,818 |
| 51-55 | G | 1,818 | 3,636 | 4,545 | 4,545 | 1,818 |
| 56+ | H | 2,045 | 4,090 | 5,113 | 5,113 | 2,045 |

- The five directed commercial open periods resulted in a catch of approximately 242,647 pounds. Final catch amounts will be available from the IPHC in 2021.

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 fishery was extended at the same ratio and landing limit.
- The fishery is estimated to have taken 29,012 pounds, and closed October 31. Fishing with salmon troll gear is prohibited within the Salmon Troll Yelloweye Rockfish Conservation Area (YRCA) off the northern Washington coast. Additionally, the "C-shaped" North Coast Recreational YRCA off Washington is designated as an area to be avoided (a voluntary closure) by salmon trollers.
Incidental halibut catch in the sablefish primary longline fishery north of Point Chehalis, WA

A quota of 70,000 pounds was allocated to the primary sablefish fishery in Area 2A as incidental catch north of Point Chehalis, WA. This incidental fishery is only available to vessels with a groundfish limited entry permit endorsed for longline gear with a sablefish tier limit and with an IPHC license.

The fishery is confined to an area seaward of a boundary line approximating the 100-fm depth contour. Fishing is also prohibited in the North Coast Commercial YRCA, an area off the northern Washington coast. In addition, the "C-shaped" North Coast Recreational YRCA off Washington is designated as an area to be avoided (a voluntary closure) by commercial longline sablefish fishermen.

- Beginning April 1, the incidental landing limit was 200 pounds (dressed weight) of halibut per 1,000 pounds (dressed weight) of sablefish and up to 2 additional halibut in excess of the landing limit ratio. On October 19, the landing limit increased to 250 pounds (dressed weight) of halibut per 1,000 pounds (dressed weight) of sablefish and up to 2 additional halibut in excess of the landing limit ratio.
- At the September meeting, the Council recommended extending the sablefish fishery until December 31, and allowing incidental halibut retention until the IPHC season closure on November 15.
- This fishery is projected to have landed 63,358 pounds.

Sport 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 as described below. Unless otherwise noted, the daily bag limit in all subareas was one halibut of any size, per person, per day.

- Recreational halibut fisheries in all Washington subareas were significantly impacted by restrictions related to the global pandemic. Restrictions included complete fishery closures, closed ports, and revised season dates. Details are summarized in this WDFW report to the PFMC ([Agenda Item I.1.a, Supp WDFW Report 1, September 2020](#))

Washington Inside Waters Subarea (Puget Sound and Strait of Juan de Fuca)

This area was allocated 77,550 pounds (23.5% of the first 130,845 pounds allocated to the Washington sport fishery, and 32% of the Washington sport allocation between

130,845 and 224,110 pounds). The fishery in Puget Sound was open May 20 through June 30 on alternating days. The fishery reopened August 6-8, 13-15, 20-22, 27-29, September 3-5, 10-12, 17-19, 24-26, and 27-29.

- The estimated total catch in this area is 59,002 pounds, which is 18,548 pounds under the quota.

Northern Washington Coastal Waters Subarea (landings in Neah Bay and La Push)

The coastal area off Cape Flattery to Queets River was allocated 128,187 pounds (62.2% of the first 130,845 pounds allocated to the Washington sport fishery, and 32% of the Washington sport allocation between 130,845 and 224,110 pounds). The fishery was open August 6-8, 13-15, 20-22, 27-29, September 3-5, 10-12, 17-19, 24-26, and 27-29. The "C-shaped" North Coast Recreational YRCA, southwest of Cape Flattery, was closed to sport halibut fishing.

- The estimated total catch for this area is 59,993 pounds, which is 68,194 pounds under the quota.

Washington South Coast Subarea (landings in Westport)

The area from the Queets River to Leadbetter Point was allocated 62,896 pounds (12.3% of the first 130,845 pounds allocated to the Washington sport fishery and 32% of the Washington sport allocation between 130,845 and 224,110 pounds). In 2020, this subarea operated with an all-depth fishery as the primary fishery, and the nearshore fishery did not open. The all-depth fishery was open August 6, 13, 16, 20, 23, 27, 30, September 3, 4, 6, 10, 11, 13, 17, 20, 24, and 27-29.

- The all-depth fishery estimated catch is 54,550 pounds which is 8,346 pounds under the quota.

Columbia River Subarea (Leadbetter Point to Cape Falcon)

This sport fishery subarea was allocated 18,450 pounds, consisting of 2.0% of the first 130,845 pounds allocated to the Washington sport fishery, and 4.0% of the Washington sport allocation between 130,845 and 224,110 pounds, 2.3% of the Oregon sport allocation, and any quota over 8,000 pounds in the Southern Oregon subarea. The fishery operates with an all-depth and nearshore fishery. The nearshore fishery is allocated 500 pounds to accommodate incidental halibut retention during groundfish fishing when the all depth halibut fishery in this area is closed.

- This fishery normally opens in early May, however due to restrictions due to the global pandemic in 2020, was delayed until early August. This subarea opened at the same time as other subareas in Washington.
- The all-depth fishery was open August 6, 13, 16, 20, 23, 27, 30, September 3, 4, 6, 10, 11, 13, 17, 20, 24, 27, 28, and 29. The nearshore fishery was open August 10 Monday –Wednesday each week until September 30.
- The all-depth fishery estimated catch is 5,617 pounds which is 12,333 pounds under the subarea quota.

Oregon Central Coast Subarea (Cape Falcon to Humbug Mountain)

This sport fishery subarea was allocated 271,582 pounds (93.79% of the Oregon sport allocation).

Three seasons occurred in this subarea:

1. a restricted depth nearshore (inside 40-fathom) fishery, opened May 1, seven days a week;
2. a fixed Spring season in all depths that was open on May 21-23, 28-30, June 11-13, 18-20, July 9-11, 16-18, 23-25, and July 30-August 1;
 - a. the opening of the fishery was delayed by one week from May 14-16 to May 21-23, at the request of several counties and harbors in the northern part of this subarea, due to restrictions from the Oregon Governor's "Stay at Home" emergency order.
3. a Summer season in all depths that was open August 6-8, and was open every other Thursday through Saturday until October 31. On August 27, the fishery opened every Thursday through Saturday until October 31.

Harvest in this subarea in these seasons is summarized in the bullets below.

- The Spring all-depth fishery resulted in an estimated catch of 114,235 pounds, which is 56,868 pounds under the spring allocation. The remaining quota would shift to other fisheries as needed.
- The Summer all-depth fishery has an estimated catch of 20,160 pounds, which is 47,738 pounds under the initial allocation.
- The inside 40-fathom fishery has an estimated catch of 23,493 pounds, which is 9,098 pounds under the initial allocation.

Southern Oregon (Humbug Mountain to the OR/CA Border)

This sport fishery was allocated 8,000 pounds (3.9% of the Oregon sport fishery allocation minus the Oregon contribution to the Columbia River subarea). This area has a pre-set season of 7 days per week from May 1 to October 31.

- This fishery has estimated catch of 7,380 pounds, which is 620 pounds under the quota.

California (Off the California Coast)

This sport fishery was allocated 39,000 pounds (4.0% of the non-tribal share). The fishery was open May 1- August 11, and closed after the quota was estimated to be taken.

- The fishery has an estimated catch of 64,107 pounds which is 25,107 pounds over the quota.
- See APPENDIX I for more details from California Department of Fish and Wildlife

Tribal Fisheries

525,000 pounds (35% of the Area 2A catch limit) was allocated to tribal fisheries. The tribes estimated that 32,200 pounds would be used for ceremonial and subsistence (C&S) fisheries and the remaining 492,800 pounds were allocated to the commercial fishery.

- The unrestricted fishery was open 55 hours for each tribe between March 14 and September 30. The unrestricted fishery landed 277,421 pounds.
- The first restricted fishery was open 222 hours for each tribe between March 14 and September 30. The first restricted fishery landed 94,400 pounds.
- The second unrestricted fishery was open 36 hours for each tribe between March 14 and September 30. The second unrestricted fishery landed 84,449 pounds.

- The late fishery is open October 5- November 15, with a restricted 800 pound limit. The fishery caught 32,645 pounds.
- The total landings for all tribal fisheries is 488,915 pounds, which is 3,885 pounds under the tribal commercial allocation. The C&S fishery will continue through December 31 and catch estimates will be reported by the tribes in January 2021.

Table 2. Summary of all Area 2A quotas and preliminary 2020 harvest estimates, updated with fishery information reported to NMFS through 12/18/2020.

| 2020 Area 2A Catch Limit and Catch (in pounds) | | | 2020 Quota | Catch to date | % Quota taken |
|--|---------------------|------------------|------------|---------------|---------------|
| Tribal | | | 525,000 | | |
| Tribal | C&S | | 32,200 | - | - |
| Tribal | Comm | | 492,800 | 488,915 | 99 |
| Non-Tribal | | | 975,000 | 743,554 | 76 |
| Commercial | | | 299,325 | 271,659 | 91 |
| Commercial | Directed | | 254,426 | 242,647 | 95 |
| Commercial | Incid. Salmon Troll | | 44,899 | 29,012 | 65 |
| WA Sport | | | 347,100 | 236,903 | 68 |
| WA Sport | Incid. Sable | | 70,000 | 63,358 | 91 |
| WA Sport | Puget Sound | | 77,550 | 59,002 | 76 |
| WA Sport | North Coast | | 128,187 | 59,993 | 47 |
| WA Sport | South Coast | | 62,896 | 54,550 | 87 |
| WA/OR | Columbia River | All-Depth | 17,950 | 5,617 | 31 |
| WA/OR | Columbia River | Nearshore | 500 | - | 0 |
| OR Sport | | | 289,575 | 165,268 | 57 |
| OR Sport | Central OR Coast | Spring all-depth | 171,103 | 114,235 | 67 |
| OR Sport | Central OR Coast | Summer all-depth | 67,898 | 20,161 | 30 |
| OR Sport | Central OR Coast | Nearshore | 32,591 | 23,491 | 72 |
| OR Sport | Southern OR | | 8,000 | 7,381 | 92 |
| CA Sport | | | 39,000 | 64,107 | 164 |
| Total | | | 1,500,000 | 1,232,469 | 82 |

Enforcement

Enforcement of the commercial, tribal and recreational Pacific halibut fisheries in International Pacific Halibut Commission Area 2A is an ongoing multi-agency effort performed cooperatively by NOAA Fisheries Office of Law Enforcement (OLE), West

Coast Division (WCD), the U.S. Coast Guard (USCG), California Department of Fish and Wildlife Enforcement Division (CDFW), Oregon State Patrol Fish and Wildlife Division (OSP), Washington Department of Fish and Wildlife Police (WDFW), and Tribal Enforcement. Table 3 presents a consolidated summary of IPHC Area 2A commercial and recreational statistics for 2020 using data elements provided by OLE, USCG, CDFW, OSP, and WDFW. See APPENDIX II for more information on West Coast Enforcement.

Table 3. Area 2A Consolidated Enforcement Statistics -2020

| 2020 AREA 2A CONSOLIDATED ENFORCEMENT STATISTICS | | | | | | |
|---|---|---|---|--|---|---------------|
| |  |  |  |  |  | |
| EFFORT | NOAA OLE (WCD) | USCG (D11/D13) | CDFW | OSP | WDFW | TOTAL EFFORT |
| AIRCRAFT PATROLS | | | | | | |
| Number of Patrols | | 31 | | | | 31 |
| Hours | | 117 | | | | 117 |
| VESSEL PATROLS | | | | | | |
| Number of Patrols | | 102 | | | 42 | 144 |
| Hours | | 900 | | 311 | 230 | 1441 |
| SHORESIDE PATROLS | | | | | | |
| Number of Patrols | 31 | | | | 3 | 34 |
| Hours | 167 | | 13 | 414 | 13 | 607 |
| AIRCRAFT PATROL PERSONNEL HOURS | 39 | | | | | 39 |
| VESSEL AT-SEA PERSONNEL HOURS | | | 9 | 461 | 608 | 1078 |
| SHORESIDE PERSONNEL HOURS | 167 | | 66 | 264 | 219 | 716 |
| BOARDINGS AND CONTACTS | 43 | 323 | 161 | 802 | 1,680 | 3009 |
| ACTIONS | | | | | | TOTAL ACTIONS |
| ENFORCEMENT ACTIONS | 29 | 0 | 0 | 57 | 432 | 518 |
| Compliance Assistance | 11 | | | | | 11 |
| Written Warnings | 1 | | | | 113 | 114 |
| Citations | 5 | | | | 103 | 108 |
| Warnings and Citations Combined | | | | 57 | 216 | 273 |
| Other | 12 | | | | | 12 |
| RESULTS | | | | | | TOTAL RESULTS |
| RECORDED WARNINGS/VIOLATIONS | | | | | | |
| Undersized Halibut | | 1 | | 1 | | 2 |
| Over Limit | 8 | 1 | | 6 | | 15 |
| Prohibited Gear | | | | | 3 | 3 |
| Logbook/Reporting | 3 | | | | | 3 |
| Permit/License | | | | 1 | 4 | 5 |
| Restricted/Closed Area | | | | | 27 | 27 |
| Failure to Validate Tag | | | | 7 | | 7 |
| Illegal Harvest | | | | 13 | | 13 |
| Take/Possess Groundfish with Halibut on Board | | | | 4 | | 4 |
| VMS | 8 | 3 | | | | 11 |
| Prohibited Species | | | | | 2 | 2 |
| Seabird Avoidance | 7 | | | | | 7 |
| Non-Compliance/Not Specified | 3 | | | 54 | | 57 |

Alaska, United States of America – IPHC Regulatory Areas 2C, 3 and 4

Charter Halibut Fisheries

Harvest under 2020 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 2020, charter operations were regulated under two distinct periods in Areas 2C and 3A: the initial period began on March 13 and extended through June 14; the second period began on June 15 and lasted through the end of 2020. The second period was the result of regulatory changes recommended by the North Pacific Fishery Management Council and IPHC to address an unexpected decline in charter fishing effort in the 2020 season. These actions are described in more detail in the report sections below.

In Area 2C, the 2020 charter catch limit was 780,000 pounds (lb.). The fishery was initially 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 lower length of the slot limit was changed to 45 inches or less in the latter portion of the fishing season. The preliminary 2020 charter halibut harvest estimate of 499,535 lb is 36.0 percent below the catch limit.

In Area 3A, the 2020 charter catch limit was 1,710,000 lb. The fishery was initially managed under a two-fish daily bag limit; a maximum size limit of 28 inches was implemented for one of the retained fish; halibut retention was prohibited on all Wednesdays and five consecutive Tuesdays; 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. In the latter portion of the season, the 4-fish annual limit was rescinded, charter halibut retention was allowed on all days of the week, and the 28-inch maximum size limit was raised to 32 inches. The preliminary 2020 charter halibut harvest estimate of 1,710,000 lb in Area 3A was 6.6 percent below the catch limit.

In December 2020, the Council recommended charter management measures for the 2021 fishery. These management measures are described in sections below.

Guided Angler Fish Program- 2020 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 2020, charter vessel anglers who used GAF 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 the first part of the Area 3A season. Table 1 summarizes IFQ to GAF transfers for 2014 through 2020. From the outset of the program, GAF is has been used more frequently in Area 2C than 3A, but overall in 2020 the use of GAF decreased substantially in both areas. In Area 2C in 2020, 57,645 pounds of IFQ was transferred as GAF to the charter fishery; this translated into 801 harvestable halibut, of which 95% (765 fish) were actually taken. In Area 3A in 2020, 5,240 pounds IFQ was transferred as GAF, resulting in 92 harvestable fish. However, only 41% (38 fish) of the Area 3A GAF was taken. This

was likely related to changes in the regulations that rescinded the 4-fish annual limit for Area 3A halibut in the latter portion of the season.

Table 1. Summary of IFQ to GAF transfers

| Year | IPHC Regulatory Area | Number of 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%) |
| 2020 | 2C | 235 | 57,645 | 801 | 764 (95%) |
| | 3A | 15 | 5,240 | 92 | 38 (41%) |
| | Total | 250 | 62,885 | 893 | 802 (90%) |

*NPFMC Charter Halibut Fishery actions in 2020*December 2020 Council Meeting

On December 4, 2020 the Council approved management measures for charter halibut fishing in Areas 2C and 3A for the 2021 fishing season. These recommendations are submitted as Regulatory Proposal B1 to the IPHC for the January 2021 annual meeting. The measures approved by the Council were developed by the Charter Halibut Management Committee based on analyses provided by ADF&G at APPENDIX I as well as the needs of the fishery. These measures are expected to constrain overall charter removals to the final 2021 area allocations, as determined by the IPHC under the Catch Sharing Plan.

May 2020 Special Council meeting

At a special meeting held in May 2020, the Council took action to recommend less restrictive charter halibut management measures for IPHC Regulatory Areas 2C and 3A for the remainder of the 2020 fishing season. The IPHC subsequently addressed the issue at a special session held on May 20, and adopted the recommendations.

The Council decision was in response to a proposal received from Area 2C and 3A charter representatives related to the impacts of the COVID-19 pandemic on the charter halibut fishery. Within the proposal to the Council, charter representatives submitted two requests. The first request asked to relax the established Area 2C and 3A charter halibut management measures (e.g. bag limits, size restrictions, and day of the week closures – details are provided in the section above) for the remainder of the 2020 charter fishing season. Significant charter cancellations and a large reduction in angler interest resulted in lower than expected levels of charter fishing effort than suggested in the Council's December 2019 analysis. Relaxing management measures provided some additional market opportunity for this struggling sector while still keeping each Regulatory Area under its allocation as established by the Catch Sharing Plan.

The charter representatives' second request was for a rollover of unused charter allocation from 2020 to 2021 in IPHC Regulatory Areas 2C and 3A; however, the Council did not recommend the rollover. The Council's decision was partly based on comments received from the IPHC Secretariat that suggested a rollover of this nature would primarily be an allocative issue, as projected harvests that are not completely taken in 2020 will be factored into the stock assessment and population dynamics in the subsequent year.

February 2020 Council Meeting

At this meeting the Council reviewed a supplemental analysis from ADF&G of potential charter halibut management measures for implementation in Area 3A in 2020 and ultimately identified their recommended management measures for implementation in 2020.

In December 2019 the Charter Halibut Management Committee was not able to identify management measures for Area 3A that would meet the reference level of halibut removals specified at the November IPHC Interim Meeting, but did identify management measures for Area 2C that the Council recommended for implementation. The committee held a teleconference on January 23, 2020 to evaluate additional measures for Area 3A that could achieve the reference TCEY. The Alaska Department of Fish and Game (ADF&G) conducted a supplemental analysis to evaluate additional management measures requested by the committee.

The Council's Charter Halibut Management Committee report contained statements from Area 2C and Area 3A representatives that the restrictions placed on the charter fleet in

both areas is likely to result in a number of charter businesses and other support businesses closing in fishing communities around the State. Council members acknowledged the “very real and severe economic challenges” that the proposed regulations for 2020 will create, and also acknowledged that additional challenges are likely to occur in the near future.

The Council also reviewed and approved suggested language to clarify the Council’s intent in IPHC proposal IPHC-2020-AM096-PropB1 that described the Council’s proposed management measures for Area 2C charter halibut fishing in 2020.

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 2020 are shown in Tables 2 and 3.

Table 2. 2020 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 | 1,465 | 1,025 (41%) |
| Non-trawl | 710 | 76 | 634 (89%) |
| Community Development Quota (trawl and non-trawl) | 315 | 115 | 200 (64%) |
| TOTAL | 3,515 | 1,656 | 1,656 (47%) |

Table 3. 2020 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 | 788 | 918 mt (54%) |
| Non-trawl | 257 | 3 | 254 mt (99%) |
| TOTAL | 1,963 | 791 | 1,172 mt (60%) |

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.

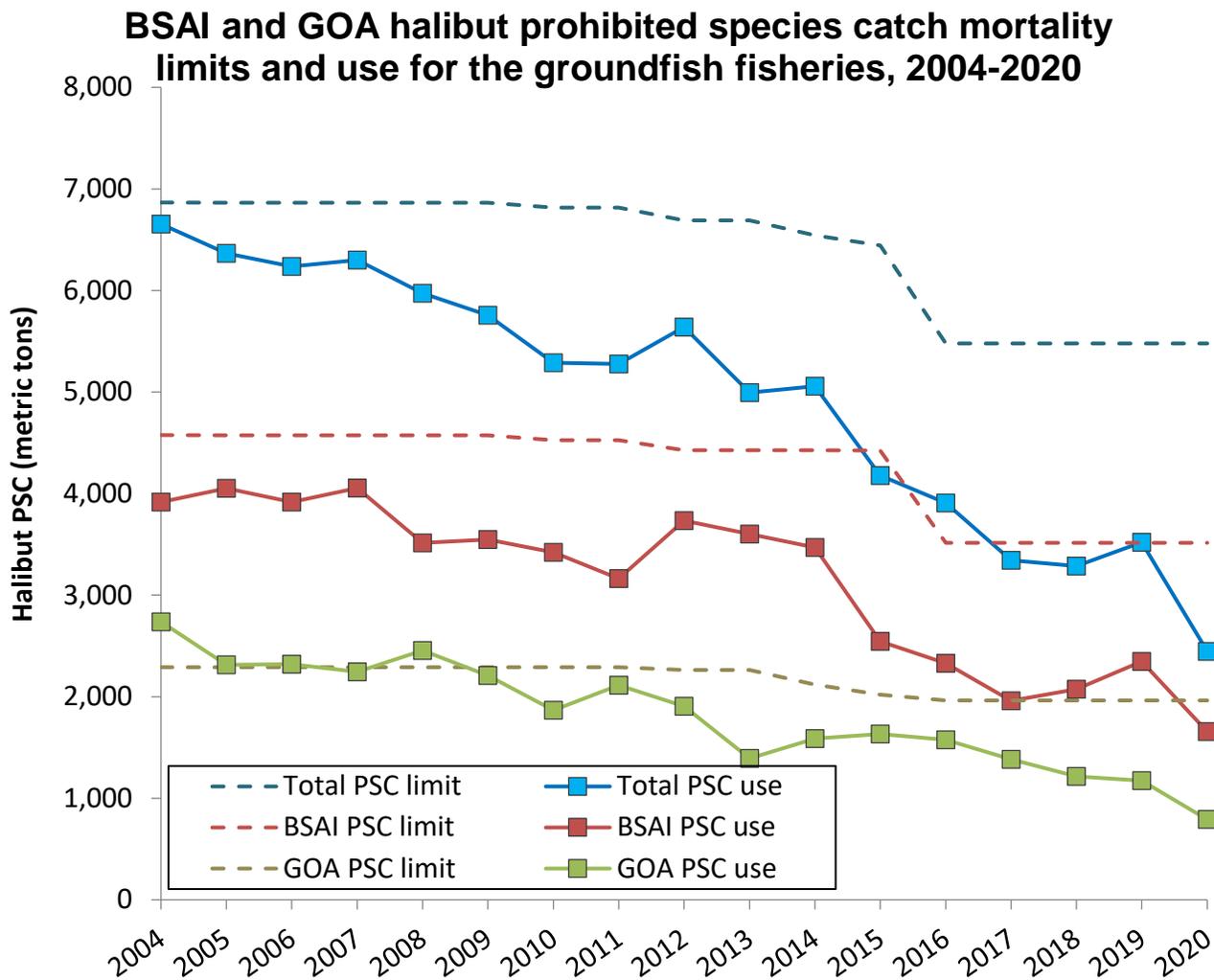


Figure 1. Total BSAI (including CDQ and deck sorting exempted fishing permit for 2016 - 2019) and GOA halibut prohibited species catch limits and use for all groundfish fisheries, 2004 through 2020.

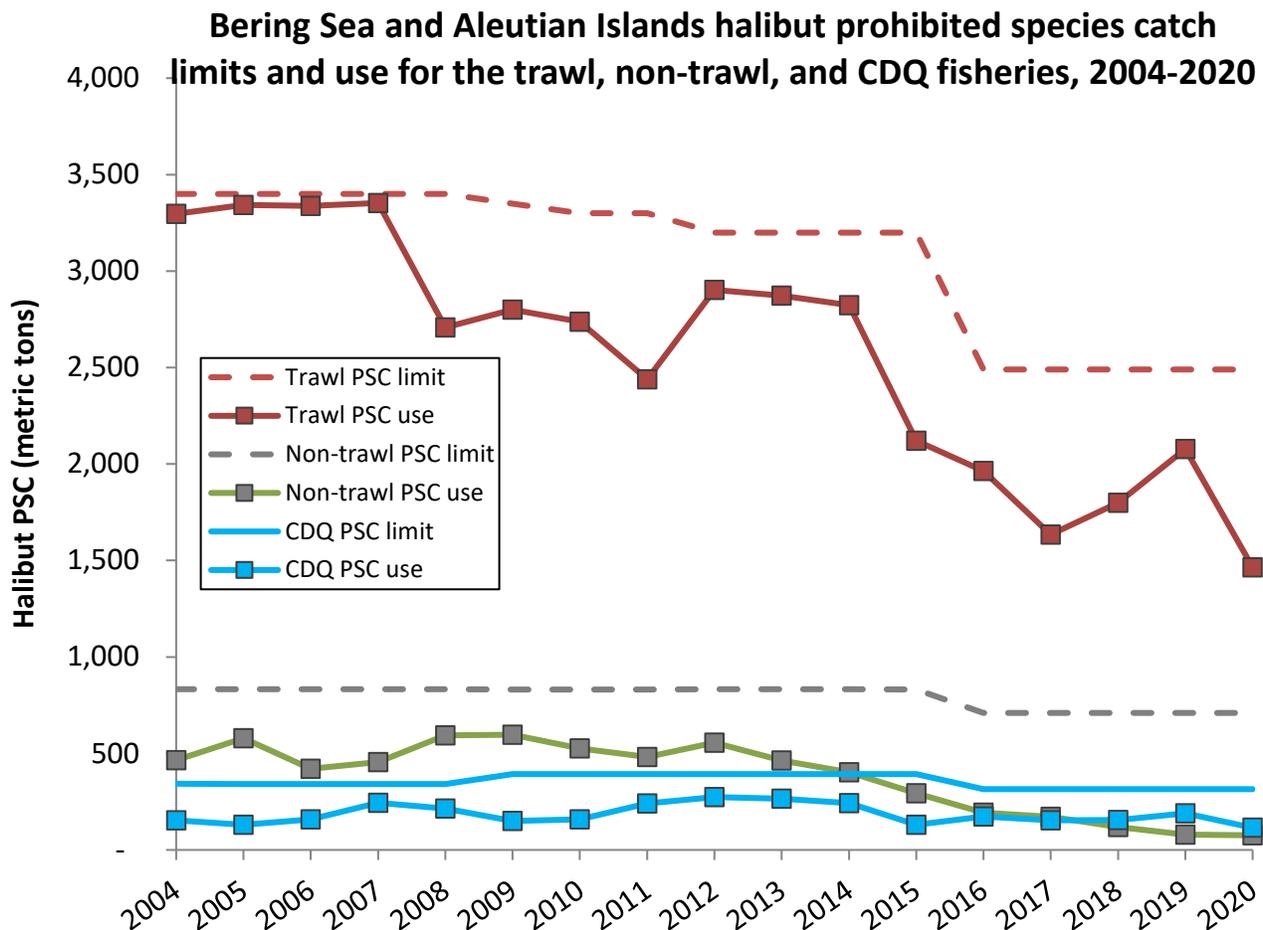


Figure 2. BSAI halibut prohibited species catch limits and use for the trawl (including deck sorting exempted fishing permit for 2016 - 2019), non-trawl, and CDQ groundfish fisheries, 2004 through 2020.

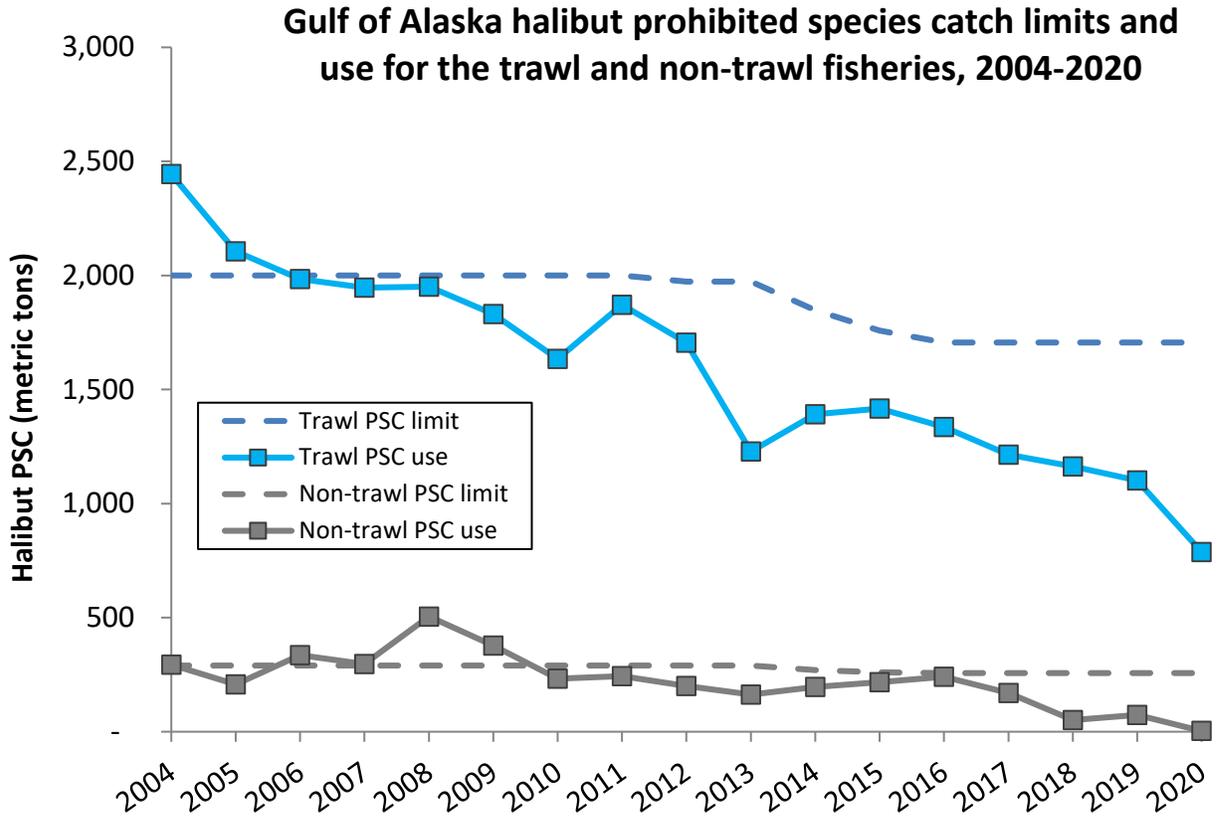
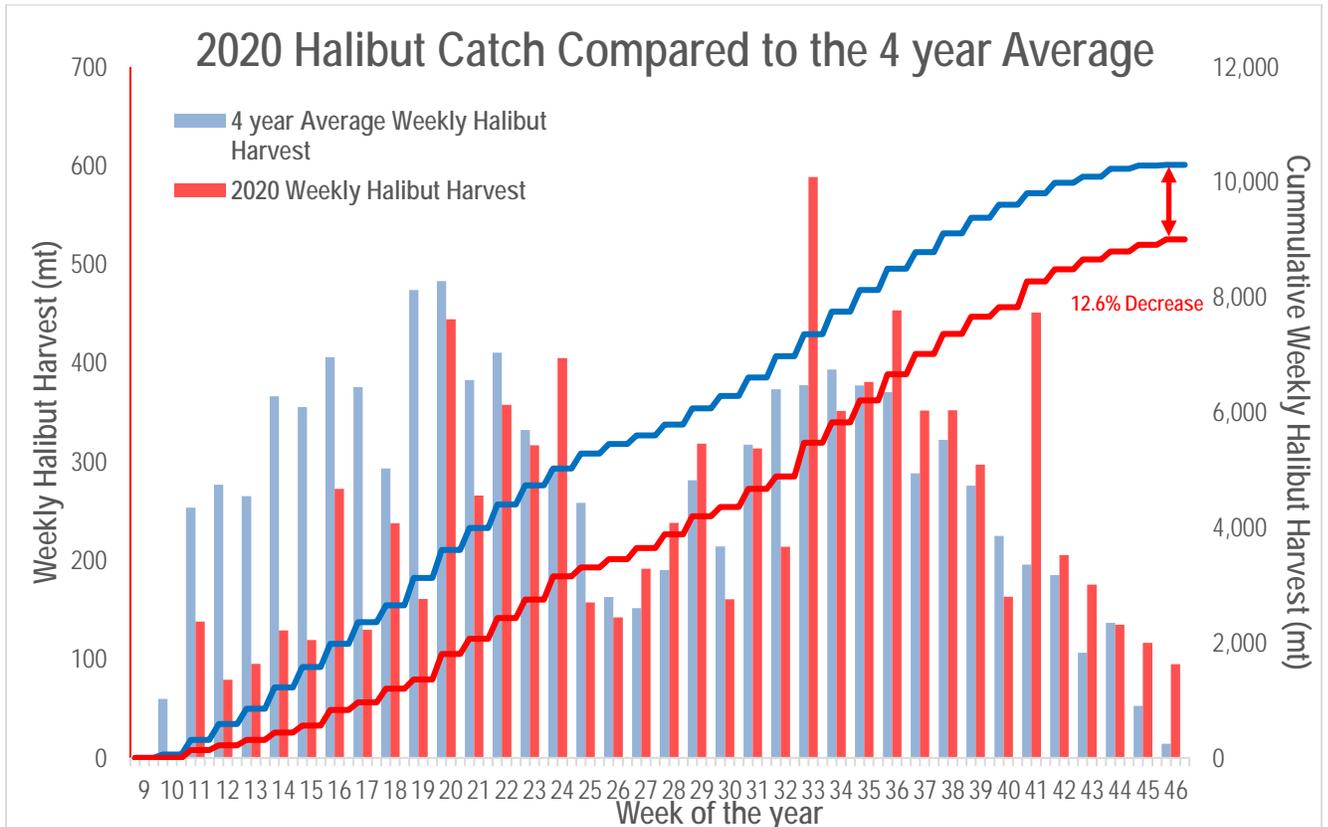


Figure 3. GOA halibut prohibited species catch limits and use for the trawl and non-trawl groundfish fisheries, 2004 through 2020.



2020 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 IV 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 permit (EFP) application

NMFS received an application for an EFP from the Alaska Seafood Cooperative (AKSC). The EFP was requested by John Gauvin from AKSC on June 2, 2020. This EFP would enable a collaborative study with Amendment 80 fishermen of halibut excluders in the Bering Sea flatfish trawl fishery to conduct field testing to explore improved designs.

This EFP would involve one trip with twin trawls on the vessel North Star, which would do up to 70 tows in the one trip in both yellowfin and flatfish fisheries. To address potential differences in catch rates, the excluder device would be switched from one side to the other at the half way point for each part of the EFP testing (i.e. halfway through the tows in the yellowfin target; same for the tows in the flathead target). This would allow a separate analysis of excluder performance in each net, which would help to identify differences in catch rates for halibut and target species between sides. Ancillary data collection will involve taking fin clips from halibut to see whether the sex can be identified. This information is of interest to the IPHC.

The applicant is aiming to do the field testing in August 2021. The activities proposed under the EFP are not expected to have a significant impact on the human environment. To conduct this experiment, exemptions would be necessary from two regulations. First, an exemption would be necessary from the requirement to minimize catch of prohibited species at § 679.21(a)(2)(i) in the event higher than average catch of halibut is encountered during field testing.

NMFS will send a letter to the IPHC in January to provide notice of this EFP application for review and determination as to whether this action requires further consultation.

Halibut Abundance Based Management

In October 2020, The Council reviewed both a preliminary draft environmental impact statement (DEIS) and a discussion paper on approaches to indexing Amendment 80 (A80) halibut prohibited species catch (PSC) limits to abundance. The discussion paper also contained information on other approaches to incentivize the A80 sector to minimize halibut bycatch.

The action alternatives in the preliminary DEIS were initially proposed by stakeholders and refined and adopted by the Council over a series of meetings. Alternatives 2 through 4 set PSC limits based on control rules that are indexed to either the EBS trawl survey (Alternative 2) or the IPHC setline survey (Alternatives 3 and 4). The alternatives include a range of elements and options for floors, ceilings and other features that modify the responsiveness of the control rule that establishes the PSC limit based on abundance. The model-based analysis of alternatives indicated that the magnitude of change in PSC limits over time would be higher than the change in directed fishery catch and that, given

the information available on Pacific halibut recruitment projected forward, PSC limits within the projected range negligibly impact long-term spawning stock biomass (SSB), but near-term trends in SSB vary mainly based on the current IPHC assessment age structure. Lower PSC limits are projected to result in greater directed halibut fishery catches (although at less than a 1:1 ratio) and are expected to reduce gross revenues for the A80 groundfish sector to varying degrees. The Council also reviewed a social impact assessment (SIA) that evaluates community and regional patterns of engagement in, and dependency on, the BSAI Amendment 80 groundfish fishery and the BSAI/Area 4 commercial and non-commercial halibut fisheries as well as the potential for community level impacts under the no-action and action alternatives.

The discussion paper provided information on three proposed approaches that could substitute for the ABM approach analyzed in the DEIS: a look-up table control rule with breakpoints based on states of both surveys, a PSC performance standard applied to the status quo limit, and a concept that would shift halibut mortality from the A80 PSC limit to the CDQ reserve for directed commercial halibut harvest in Area 4CDE.

Following extensive review of the DEIS and discussion paper, SSC and AP review, and considerable public testimony, the Council revised the purpose and need statement to more directly address the action before the Council. In doing so the Council noted that it was removing the previously derived objectives and relying upon those folded into the new purpose and need as the stated objectives for any future action. The revised purpose and need statement is shown below:

Halibut is an important resource in the Bering Sea and Aleutian Islands (BSAI), supporting commercial halibut fisheries, recreational fisheries, subsistence fisheries, and groundfish fisheries. The International Pacific Halibut Commission (IPHC) is responsible for assessing the Pacific halibut stock and establishing total annual catch limits for directed fisheries and the North Pacific Fishery Management Council (Council) is responsible for managing prohibited species catch (PSC) in U.S. commercial groundfish fisheries managed by the Council. The Amendment 80 sector is accountable for the majority of the annual halibut PSC mortality in the BSAI groundfish fisheries. While the Amendment 80 fleet has reduced halibut mortality in recent years, continued decline in the halibut stock requires consideration of additional measures for management of halibut PSC in the Amendment 80 fisheries.

When BSAI halibut abundance declines, PSC in Amendment 80 fisheries can become a larger proportion of total halibut removals in the BSAI, particularly in Area 4CDE, and can reduce the proportion of halibut available for harvest in directed halibut fisheries. The Council intends to establish an abundance-based halibut PSC management program in the BSAI for the Amendment 80 sector that meets the requirements of the Magnuson-Stevens Act, particularly to minimize halibut PSC to the extent practicable under National Standard 9 and to achieve optimum yield in the BSAI groundfish fisheries on a continuing basis under National Standard 1. The Council is considering a program that links the Amendment 80 sector PSC limit to halibut abundance and provides incentives for the fleet to minimize halibut mortality at all times. This action could also promote conservation of the halibut stock and may provide additional opportunities for the directed halibut fishery.

The Council revised its alternatives to meet the purpose and need, and direction was provided to analysts on the scope of the analysis for the next draft of the preliminary DEIS. The Council recommended replacing the existing suite of action alternatives in the DEIS with the following three action alternatives based upon different look up tables utilizing breakpoints determined by both the IPHC setline survey and the EBS trawl survey. Under any of the action alternatives, the PSC limit would be determined annually based on

survey values from the most recent year available. A synopsis of the alternatives is provided below; the actual look up tables contained in the Council's motion are posted to the October eAgenda.

Alternative 2: A 3X2 look-up table with PSC limits that range from current PSC limit to 20% below current limit.

Alternative 3: A 4X2 look-up table with PSC limits that range from 15% above current PSC limit to 30% below current limit.

Alternative 4: A 4X2 look-up table with PSC limits that range from current PSC limit to 45% below current limit.

The Council also adopted four options that could be applied to any of the alternatives.

Option 1: PSC limit is determined using a 3-year rolling average of survey index values instead of the most recent survey value.

Option 2: PSC limit varies no more than (suboptions: 10% or 15%) per year.

Option 3: Establish an annual limit of (suboptions: 80% or 90%) of the PSC limit generated by the look-up table. In 3 of 7 years, the A80 sector may exceed the annual limit up to the PSC limit generated by the look-up table. If the A80 sector has exceeded the annual limit in 3 of the past 7 years, then (suboptions: 80% or 90%) of the PSC limit generated by the look-up table is a hard cap for that year.

Option 4: (mutually exclusive with Options 2 and 3) PSC unused in one year may roll to the following year to increase the PSC limit generated by the lookup table up to 20%. Any PSC savings in excess of 20% would stay in the water.

The Council requested that the next version of the DEIS shift the analytical focus from a management strategy evaluation (MSE) approach centered on evaluating objectives with respect to performance metrics to a more traditional impacts analysis on the affected fishing sectors and other affected resource components. The analysis will provide the information necessary for the Council to understand the expected impacts of each alternative on the affected sectors and use the information to develop an action that balances the requirements of the Magnuson-Stevens Act. The analysis is scheduled for initial review in April 2021 which following timing requirements for NEPA with an EIS would set up final action in Fall 2021.

Observer Fee Increases

In October 2019, the Council unanimously recommended to increase the observer fee to 1.65 percent. Beginning on January 1, 2021, a fee equal to 1.65 percent of the ex-vessel value will be assessed on the landings of groundfish and halibut subject to the fee. The fee is increased from 1.25 percent to 1.65 percent to support observer and electronic monitoring deployment at rates more likely to meet the Council's and NMFS' monitoring objectives (85 FR 41424, July 10, 2020). Ex-vessel value is determined by multiplying the standard price for groundfish by the round weight equivalent for each species, gear, and port combination, and the standard price for halibut by the headed and gutted weight equivalent. Standard prices are determined by aggregating prices by species, gear, and area grouping to arrive at an average price per pound for each grouping. NMFS reviews each vessel landing report and determines whether the reported landing is subject to the observer fee and, if so, which groundfish species in the landing are subject to the observer fee. All IFQ or CDQ halibut in a landing subject to the observer fee will be included in the observer fee calculation. For any landed groundfish or halibut subject to the observer fee, NMFS will apply the appropriate standard ex-vessel prices for the species, gear type, and port, and calculate the observer fee associated with the landing. Each year NMFS

publishes standard prices in a notice in the Federal Register (85 FR 82447, December 18, 2020).

Increasing the fee percentage does not strictly mean that fee revenues will increase relative to previous years. Gross fee revenues are a function of the harvest and standard ex-vessel prices, which may be independent of fee percentage charged against gross ex-vessel revenue and are therefore affected by market fluctuations. Additionally, the cost of monitoring services (observer and EM deployment) affect the amount of coverage that can be purchased with available funds.

Observer Coverage Rates

Overall, for all federal fisheries off Alaska, 4,497 trips (41.6%) and 510 vessels (47%) were monitored by either an observer or EM system in 2019. A total of 404 individual observers were trained, briefed, and equipped for deployment to vessels and processing facilities operating in the BSAI and GOA groundfish and halibut fisheries.

Observers collected data on board 398 fixed gear and trawl vessels and at eight processing facilities for a total of 39,989 observer days (36,068 full coverage days on vessels and in plants; and 3,921 observer deployment days in partial coverage).

A summary of the number of vessels and trips in each stratum and realized coverage rates in 2019 were as follows:

| Coverage category | Strata | Total vessels | Total trips | Sampled trips | Coverage rate |
|-------------------|----------------------------|---------------|-------------|---------------|---------------|
| Full coverage | Full | 161 | 3,343 | 3,338 | 99.9 |
| Partial coverage | Hook-and-Line | 318 | 1744 | 307 | 17.6 |
| | Pot | 73 | 528 | 74 | 14.0 |
| | Tender Pot | 30 | 44 | 13 | 29.5 |
| | Trawl | 78 | 1568 | 395 | 25.2 |
| | Tender Trawl | 26 | 56 | 20 | 35.7 |
| | EM Hook-and-Line | 138 | 916 | 291 | 31.8 |
| | EM Pot | 21 | 165 | 60 | 36.4 |
| No selection | Zero Coverage | 393 | 2005 | 0 | 0.0 |
| | Zero Coverage- EM Research | 4 | 29 | 0 | 0.0 |

In December, 2019, NMFS released the final 2020 ADP with the following strata and deployment rates:

- No Selection – 0%
- Trawl – 20%
- Hook-and-line – 15%
- Pot – 15%
- Fixed-Gear EM – 30%
- Trawl EM EFP–100% at-sea EM; plus: 30% shoreside monitoring in GOA or 100% shoreside monitoring in BS

Starting in March, 2020, the COVID-19 pandemic created limitations on available air travel and “shelter in place” restrictions, particularly in many remote Alaskan communities. Under the emergency rule signed on March 24, 2020, NMFS temporarily waived the requirement for vessels in the Partial Coverage Category to carry a fishery observer from March 27 through April 19, 2020. On April 18, 2020, NMFS announced a limited extension of the temporary waiver of observer requirements, which narrowed the scope and reinitiated deployment of observers on trips departing from the port of Kodiak, Alaska (the majority of GOA trawl fisheries occurred out of Kodiak during this timeframe). On June 28, 2020, NMFS expanded observer deployment in the partial coverage category to include 13 ports in addition to Kodiak, which further reduced the scope of waivers issued. The largest component of the Alaskan groundfish fisheries, vessels, and processors in the full coverage category (including catcher processors and participants in limited access privilege programs), were not issued waivers in 2020. Additionally, requirements for deployment of EM was not waived for trawl catcher vessels fishing under the trawl EM exempted fishing permit and only a few trips were released from coverage under the fixed gear EM portion of the partial coverage category for circumstances when an EM service technician was unable to travel.

Table 1. Sampling strata and selection pools in the partial coverage category from 2013 to the present. The partial coverage selection rates set through the Annual Deployment Plan since 2013 are noted and the realized coverage rates evaluated in the Annual Report are noted in parentheses. CP = catcher/processor vessel; CV = catcher vessel; GOA= Gulf of Alaska; BS = Bering Sea; H&L = hook-and-line gear; LOA = vessel length overall.

| Year | Observer trip selection pool Observer coverage required on all randomly selected trips | EM trip selection pool EM required on randomly selected | Trawl EM | Observer vessel selection pool | No selection pool Observer coverage not required | |
|------|---|--|---|---|---|--|
| 2020 | Trawl: 20% H&L: 15% Pot: 15% | Fixed gear (H&L and Pot) EM: EM required on randomly selected 30% of trips | 100% at-sea EM; 30% shoreside monitoring in GOA and 100% shoreside monitoring in BS | n/a | EM Innovation Research 4 vessels | |
| 2019 | Trawl: 24% (25.2) Trawl Tender: 27% (35.7) H&L: 18% (17.6) Pot: 15% (14.0) Tender Pot: 16% (29.5) | | | | | |
| 2018 | Trawl: 20% (20.3) Trawl Tender: 17% (35.0) H&L: 17% (15.5) Pot: 16% (15.5) Tender Pot: 17% (29.0) | H&L EM: 30% | Pot EM Pre-implementation: 30% | | | |
| 2017 | Trawl : 18% (20.7) Trawl Tender : 14% (18.8) H&L: 11% (12.0) H&L Tende r: 25% (0) Pot: 4% (7.7) Tender: 4% (5.3) | n/a | n/a | | | Vessels <40' LOA and Jig gear |
| 2016 | Trawl: 28% (28.0) H&L: 15% (15.0) Pot: 15% (14.7) | | | | Vessels <40' LOA and Jig gear | Voluntary EM Pre-implementation 60 vessels |
| 2015 | Large Vessel: 24% (23.4) Small Vessel: 12% (11.2) Trawl CVs, Small CPs, H&L/Pot CVs ≥ 57.5' H&L/Pot CVs >40' and <57.5' | | | | Vessels <40' LOA and Jig gear | Voluntary EM Pre-implementation 12 vessels |
| 2014 | All Trawl CVs and H&L/Pot vessels ≥ 57.5' LOA: 16% (15.1) | | | | H&L/Pot CVs >40' and <57.5': 12% (15.6) | Vessels <40' LOA and Jig gear |
| 2013 | All Trawl CVs and H&L/Pot vessels ≥ 57.5' LOA: 14.5% (14.8) | | | H&L/Pot CVs >40' and <57.5': 11% (10.6) | Vessels <40' LOA and Jig gear | |

Commercial Halibut IFQ Program

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 a Final Rule to implement IFQ Beneficiary and Medical Transfer Provisions published on February 14, 2019 (85 FR 8477), effective March 16, 2020. 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.

Temporary Transfers of IFQ for 2020 Fishing Year

On June 25, 2020, NMFS published an emergency rule to modify the temporary transfer provision of the IFQ Program for the fixed-gear commercial Pacific halibut and sablefish fisheries for the 2020 IFQ fishing year. Temporary transfer of IFQ was permitted for all quota share holders. Other aspects of the IFQ Program such as IFQ area designation, vessel size designation, use (ownership) caps, and vessel caps were not modified by this action. The emergency rule was effective from June 25, 2020 through December 22, 2020. The Council recommended action was specific to the 2020 fishing year and, as such, NMFS did not solicit comments on this temporary rule and therefore this rule cannot be extended.

The NPFMC recommended this temporary action with the recognition that travel restrictions, health mandates, and other logistical and operational challenges posed by the COVID-19 pandemic presented management challenges for the IFQ fisheries. The Council concluded that increased flexibility to temporarily transfer IFQ pounds would reduce the amount of anticipated forgone harvest and would accommodate the wide variety of operational plans that IFQ owners and vessel operators use to harvest halibut and sablefish. The Council further noted that existing hired master provisions and medical transfer provisions leave out a portion of IFQ holders who might be affected by the challenges of actively prosecuting the 2020 fishery. As a result, the Council chose the broadest temporary transfer provision from the options it was presented.

Halibut IFQ Vessel Use Caps in Areas 4B, 4C, and 4D

On May 15, 2020 the NPFMC recommended an emergency rule to modify Halibut IFQ Vessel Use Caps in Areas 4B, C, and D. On July 9, 2020, NMFS published a final rule modifying Halibut IFQ Vessel Use Caps in Areas 4B, C, and D for the remainder of the 2020 season. That rule did not modify other aspects of the IFQ Program. The Council determined at the time that vessel capacity was uncertain for the aforementioned areas due to health and logistical challenges associated with the COVID-19 pandemic. The action was intended to reduce the risk that a portion of the halibut IFQ harvest would be forgone due to limited vessel capacity. The Council did not extend its recommendations to sablefish or to halibut in other IPHC management areas because fewer vessels have operated at or near vessel caps in those areas during previous years. The Council was clear that it strongly supports vessel caps in the IFQ Program and this emergency request represented a rare circumstance that does not indicate support to consider changing vessel caps in the future.

CQE Fish-Up in Area 3A

In June 2019, the Council recommended 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 published a final rule to implement this action on July 21, 2020 (85 FR 44021), effective August 20, 2020.

Subsistence

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). Results from this study were included in the AM096 documents.

Due to budget constraints, a survey to estimate subsistence halibut harvests in Alaska in 2019 did not take place. The grant between NOAA and the Division of Subsistence was extended and supplemented with funding to support developing a subsistence halibut harvest estimate for Alaska for 2020. The first round of mailed surveys to all Subsistence Halibut Registration Certificate (SHARC) holders will go out in January 2021, followed by two more surveys to non-respondents. We will report preliminary results at AM098 (January 2022).

NOAA Fisheries Office of Law Enforcement Alaska Enforcement Division

**Report to the International Pacific
Halibut Commission**

January 1, 2020 to December 15, 2020

**NOAA 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 in Alaska, covering 842,000 square miles of ocean, 6,600 miles of coastline, and 2,690 islands. Compliance is achieved by providing outreach and education, conducting patrols, monitoring offloads, and investigating violations of civil and criminal marine resource laws, including the Northern Pacific Halibut Act.

In 2020, there were 3,382 Individual Fishing quota (IFQ) halibut permits issued in Alaska and 30 IFQ landing ports. There were 955 charter halibut permits issued (529 for IPHC Area 2C; 426 for IPHC Area 3A), and 6,394 subsistence halibut permits.

Patrol and Boardings

In 2020, AKD personnel spent over 3,210 hours conducting patrols to deter potential violators, to monitor fishing and other marine activities, detect violations, provide compliance assistance, and provide outreach and education. OLE boarded 1,129 vessels with 648 of those boardings being related to halibut.

Results of Vessel Boardings

| | 2018 | 2019 | 2020 |
|---------------------|-------------------|-------------------|-------------------|
| | Vessel Boardings | Vessel Boardings | Vessel Boardings |
| Subsistence Halibut | 33 | 14 | 27 |
| Commercial Halibut | 473 | 216 | 314 |
| Charter Halibut | 190 | 302 | 136 |
| Sport Halibut | 168 | 261 | 171 |
| <u>Total</u> | <u>864</u> | <u>793</u> | <u>648</u> |

Compliance Assistance

In 2020, AKD personnel spent over 1,531 hours providing outreach and education to marine resource users. Outreach efforts at a number of organized events, as well as contacts in communities, ports, and at-sea, were canceled due to COVID-19. The goal of OLE outreach efforts is to ensure the most current and accurate regulatory information is widely distributed and understood.

Incidents

In 2020, AKD opened 885 halibut-related incidents, including outreach, vessel boardings, dockside monitoring, and compliance assistance. Of those 885 incidents, officers identified 396 halibut-related violations, which were resolved by compliance assistance, summary settlement, or a written warning.

Alaska Halibut Violations

| | 2018 | 2019 | 2020 |
|---|-------------------|-------------------|-------------------|
| Subsistence Halibut | 58 | 29 | 14 |
| Commercial Halibut | 136 | 250 | 197 |
| Charter Halibut | 150 | 159 | 50 |
| Sport Halibut | 64 | 57 | 51 |
| Commercial Groundfish involving Halibut | 43 | 60 | 84 |
| <u>Total</u> | <u>451</u> | <u>555</u> | <u>396</u> |

*Not all violations resulted in an enforcement penalty

2020 Halibut Related Violations documented by NOAA in Alaska:

14 Subsistence halibut fishing violations; most common violations included:

- Unqualified person applied for a SHARC
- Subsistence halibut with sport caught halibut.
- Improperly or unmarked subsistence halibut fishing gear
- Subsistence halibut fishing without a 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.

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

- IFQ halibut overages greater than 10%
- 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 crucifier.
- Retain undersized halibut, or discarding legal sized halibut
- Hired master and permit holder violations
- Vessel cap overages
- Misreporting IFQ area fished or fishing in an area with no IFQ available
- Fishing without an FFP

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

- Failure 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 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

51 Sport halibut violations; most common violations included:

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



50 Charter halibut fishing violations; most common violations included:

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

Photo: OLE seizing halibut aboard a fishing vessel in a condition other than whole filets with skin on, in violation of IPHC Fishery Regulations § 26(1)(d).

Partnerships & Patrols

From April 1, 2020 to September 30, 2020, the Office of Law Enforcement (OLE), Alaska Division (AKD) conducted extensive patrols for the purposes of enforcement and education. In addition to daily dockside and vessel patrols, AKD conducted several multi-day patrols. Patrols were often coordinated with partners including U.S. Customs and Border Protection (CBP), U.S. Fish and Wildlife Service (USFWS), U.S. Coast Guard (USCG), Alaska Wildlife Troopers (AWT) and National Park Service (NPS). Partnered patrols provide the benefit of broader enforcement and outreach opportunities.

In July, an enforcement officer partnered with AWT for a 13-day patrol on the AWT P/V ENFORCER in Southeast Alaska. The team conducted 104 joint boardings. Six federal fisheries violations were documented during the patrol; including five violations for failure to have a valid 2020 CHP and one for fishing with longline gear in federal waters without a Federal Fishing Permit (FFP).

USCG MSST-Seattle and an AKD enforcement officer conducted sea patrols in July in the vicinity of Sitka Sound, Peril Straits, Salisbury Sound, and Crawfish Inlet. Boarding teams identified violations related to vessel safety, charter halibut, IFQ, and marine mammal viewing. OLE provided boarding teams guidance regarding charter halibut and IFQ regulations.





In July, three enforcement officers completed an eight day patrol on the P/V CAPE ELIZABETH. The team boarded 45 commercial, charter, and recreational vessels between Seward and Tuxedni Bay. 45 boardings resulted in 31 documented violations including halibut over-limits, oversized halibut, exceeding a CHP passenger capacity, and exceeding halibut line limits.

In September, three enforcement officers completed a patrol onboard the P/V CAPE ELIZABETH in waters off of Homer, Anchor Point, Halibut Cove, Seldovia, and Port Graham. The operation resulted in 11

boardings and documented 6 federal violations.

Significant Halibut-Related Investigations

Civil Administrative Cases

AKD referred cases to the NOAA Office of General Counsel, Enforcement Section (GCES), which issued Notices of Violation and Assessment (NOVA) in the following civil administrative cases. A NOVA is not evidence of liability; it is only an allegation. A respondent is entitled to a fair hearing before an administrative law judge at which the government must prove liability by a preponderance of the evidence.

AK1805481 – Harley Ethelbah (operator of the F/V Jean C and IFQ permit holder), Aaron Phillips (IFQ permit holder), and Moderation Enterprises, Inc. (vessel owner) were charged under the Northern Pacific Halibut Act with retaining more IFQ halibut while fishing in Area 2C than the total amount of unharvested Area 2C IFQ aboard. A \$44,494.10 Notice of Violation and Assessment (NOVA) was issued.

AK1805110 – Kent Huff, Greg Taylor, and John Young were charged under the Northern Pacific Halibut Act with failing to carry onboard the charter vessel a legible copy of a valid GAF permit with the assigned charter halibut permit at all times that GAF fish were retained onboard. The \$500 NOVA was settled for \$450.

AK1805495 – Michael Sharrah (vessel owner/operator) and Kyla Young (IFQ permit holder) were charged under the Northern Pacific Halibut Act with taking and possessing at least sixteen undersized Pacific halibut. The \$6,000 NOVA was settled for \$5,400.

AK1708987 – Bradley Stewart Haynes (vessel owner/vessel operator/IFQ permit holder) and Gregory Beam (IFQ permit holder) were charged under the Northern Pacific Halibut Act and the Magnuson-Stevens Act with IFQ two-area violations and for making false statements. A \$195,555.34 NOVA was issued.

Criminal Referral

GCES referred the following case to the U.S. Attorney's Office for the District of Alaska for criminal prosecution:

AK1708175 – James Stevens, operator of the F/V ALASKAN STAR and F/V SOUTHERN SEAS, pled guilty to one felony count of Lacey Act false labeling. In his plea agreement, Stevens admitted knowingly making and submitting false records regarding where he

caught IFQ halibut and IFQ sablefish during 26 fishing trips between 2014 and 2017. Stevens further admitted that the records he falsified related to approximately 903,208 pounds of IFQ halibut and IFQ sablefish, which had a total approximate dock value of \$4,522,210. Among other things, he agreed to pay a \$1,000,000 fine by the time of sentencing and to recommend that the Court impose a term of imprisonment of no less than one year and one day. Sentencing is scheduled for May 10, 2021.

U. S. COAST GUARD ENFORCEMENT REPORT

TO THE INTERNATIONAL PACIFIC HALIBUT COMMISSION

**(IPHC Areas 2C, 3A, 3B, 4A, 4B, 4C,
4D and 4E)**

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



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. o 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. By 2024, 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.

Commercial Halibut Enforcement

In 2020, 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. 2019 & 2020 Geographic Distribution of Boardings on Vessels Targeting Halibut

| IPHC Area | 2019 Boardings | 2020 Boardings |
|-----------|----------------|----------------|
| 2C | 426 | 264 |
| 3A | 225 | 134 |
| 3B | 5 | 0 |
| 4A | 17 | 16 |
| 4B | 3 | 3 |
| 4C | 0 | 0 |

| | | |
|-------|-----|-----|
| 4D | 6 | 1 |
| 4E | 0 | 0 |
| Total | 676 | 418 |

There was a 38% decrease in halibut boardings this year, largely due to the significant decrease in charter halibut boardings as a result of COVID-19.

In Areas 2C through 4E, the commercial fishery is rationalized with the 2020 season lasting from March 14th to November 15th. 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.

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. 76% of the halibut boardings accomplished by D17 assets in 2020 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.

Violations and Enforcement Summary

Overall, USCG assets boarded a total of 418 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 2019 and 2020.

Table 3. 2019 & 2020 Boarding and Violation Summaries by Industry Sector

| 2019 Boardings/Violations | 2020 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 679 | Total At-Sea Boardings 418 |
| Commercial 167 | Commercial 98 |
| Charter 177 | Charter 73 |
| Recreational/Subsistence 332 | Recreational/Subsistence 247 |
| Fisheries Violations 11 | Fisheries Violations 11 |
| Commercial 7 | Commercial 8 |
| Charter 1 | Charter 3 |
| Recreational/Subsistence 3 | Recreational/Subsistence 0 |
| Fisheries Compliance Rates 98.3% | Fisheries Compliance Rates 97.4% |
| Commercial 95.8% | Commercial 91.8% |
| Charter 99.4% | Charter 95.8% |
| Recreational/Subsistence 99.1% | Recreational/Subsistence 100% |

In Area 2C:

- One commercial vessel was cited for failing to have permits on board.
- One charter vessel was cited for failing to retain carcass of size restricted charter halibut
- One charter vessel was cited for mutilated halibut and logbook discrepancies

In Area 4A:

- A commercial vessel was cited for logbook violations and discarding required retention species.
- A commercial vessel was cited for not having correct permits on board

In Area 4B:

- A commercial vessel was cited for multiple discard and logbook violations.

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 2019 violations to 2020 violations detected by USCG units.

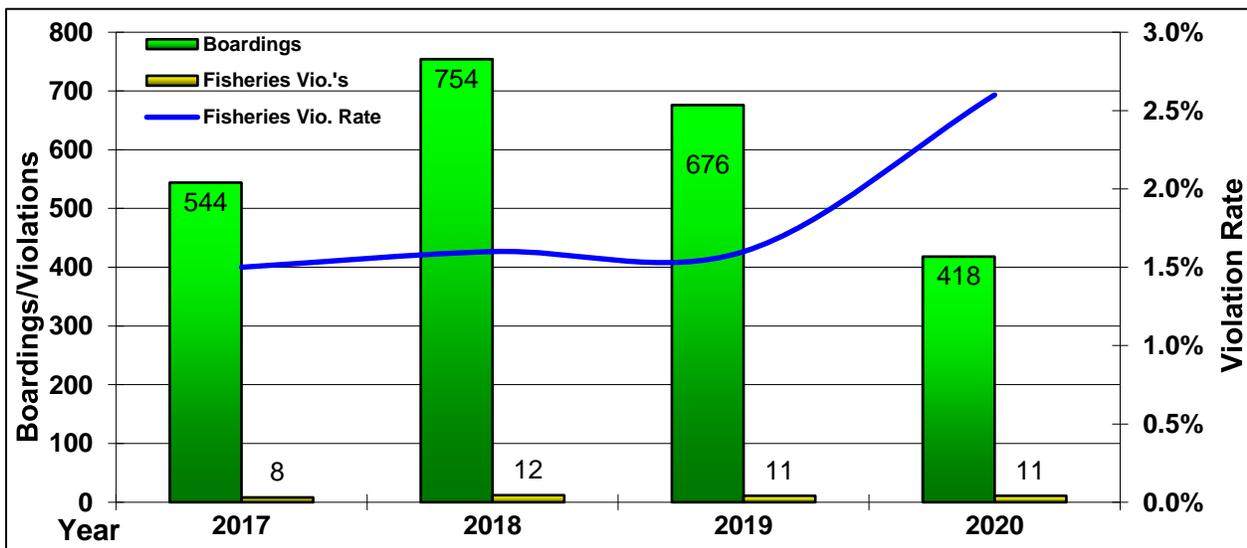
Table 4. 2019 & 2020 Description of Fisheries Violations in All Sectors

| 2019 | 2020 |
|---|---|
| Mutilation of catch.....1 | Mutilation of catch.....1 |
| Not filling out harvest ticket..... 1 | Size restricted catch 1 |
| Permit not available for inspection.....6 | Permit not available for inspection.....2 |
| No pilot ladder1 | Discards..... 2 |
| Fishing without license.....1 | Logbooks.....5 |
| Retaining over legal limit.....1 | |
| Total.....11 | 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 39 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. 2017-2020 Boardings and Fisheries Violations



The halibut fisheries violation rate averaged 1.8% 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.

COVID-19 Impacts

The Coast Guard saw the largest impact of COVID-19 in the charter halibut sector. With travel restrictions and quarantine very few people traveled to hire charter halibut vessels. There was noticeably less charter operations on the water in 2020.

In order to safely continue operations, the Coast Guard implemented safety measures to include wearing additional personal protective equipment, quarantining and testing prior to patrols to Alaska, and health screenings prior to boardings.

Enforcement Plans for 2021

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.

APPENDICES

APPENDIX I. California Department of Fish and Wildlife Report

APPENDIX II. West Coast Enforcement Division Report

APPENDIX III. Alaska Department of Fish and Game Report

APPENDIX IV. Alaska Groundfish Report

APPENDIX I

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE REPORT ON THE 2020 RECREATIONAL PACIFIC HALIBUT FISHERY

The 2020 recreational Pacific halibut fishery in California was open May 1-August 11 and closed for the year on August 11 at 11:59 p.m., due to projected attainment of the quota. The California Department of Fish and Wildlife's (CDFW) 2020 preliminary season catch estimate is 64,107 net pounds, or 164 percent of the 39,000 net pound quota.

CDFW tracks recreational catch of Pacific halibut on a weekly basis during the open season. For the week ending July 26, projected catch was 14,760 net pounds, or 38 percent of the quota. The following week of July 27-August 2, an unprecedented 256 Pacific halibut were reported as kept by anglers and catch projections through August 2 indicated the quota had been exceeded. This is a record-high weekly value for California and set new monthly high records as well. Prior to this event, the record monthly high total sampled fish was 198 fish sampled in July 2014. Adding to the unusual nature of this event, in 2019 the California recreational fishery attained only 17,440 pounds of its 39,000-pound quota.

Upon receipt of sample data through August 2 two days later, CDFW initiated the consultation process with other Area 2A managing entities, as described in the Catch Sharing Plan. On August 6 and August 7, CDFW consulted with the International Pacific Halibut Commission, National Marine Fisheries Service (NMFS), and Pacific Fishery Management Council to discuss take to date and determine a closure date. Participants agreed that August 11 at 11:59 p.m. was the earliest date the fishery could be closed to accommodate the time needed to provide notice of the closure to the public. The closure was announced via the NMFS halibut hotline, CDFW news release, CDFW halibut hotline, and flyers CDFW posted at primary launching facilities.

In response to the record high number of fish sampled in such a short period of time, CDFW is exploring enhancements or modifications to the inseason catching tracking and monitoring approaches beginning in 2021 including increasing the frequency of reporting from weekly to daily or bi-weekly during peak months.

The anomalous high catches witnessed this year were primarily from the Eureka area, with approximately 71 percent of fish reported from this area. The high catch seen in the Eureka area was not seen in the California ports of Trinidad, Crescent City or Shelter Cove.

CDFW field samplers did not examine (measure/weigh) fish this year due to physical distancing requirements necessary to maintain staff health and safety during the COVID pandemic. Following standard estimation methods, in the absence of weight data, CDFW used prior year average fish sizes when calculating monthly catch estimates for this year. However, anecdotal reports this year indicated many fish caught off California were significantly smaller than the average size seen in prior years (20-25 pounds) with this year's fish potentially being in the 10-pound range. CDFW is exploring innovative options to measure a sub-set of fish in 2021 while meeting COVID-safe sampling procedures.

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

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Marci Yaremko: marci.yaremko@wildlife.ca.gov

APPENDIX II



**NOAA
FISHERIES**

Annual IPHC Area 2A
Enforcement Report to the
International Pacific Halibut
Commission

NOAA Fisheries Office of Law Enforcement

West Coast Division

December 2020

**Annual Report to the
International Pacific Halibut Commission**

NOAA Office of Law Enforcement

West Coast Division

December 2020

TABLE OF CONTENTS

WEST COAST ENFORCEMENT
OVERVIEW.....3-4

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE, ENFORCEMENT
PROGRAM.....5-7

OREGON STATE POLICE, FISH & WILDLIFE
DIVISION.....8-11

WASHINGTON DEPARTMENT OF FISH & WILDLIFE, ENFORCEMENT
PROGRAM.....12-21

OFFICE OF LAW ENFORCEMENT – WEST COAST
DIVISION.....22-28

Annual Report to the International Pacific Halibut Commission

West Coast Enforcement

December 2020

WEST COAST ENFORCEMENT - OVERVIEW



NOAA's Office of Law Enforcement (OLE) protects marine wildlife and habitat by enforcing domestic laws and international treaty requirements implemented to ensure these global resources are available for future generations. The 2020 IPHC Area 2A Enforcement Report summarizes the collective activities of the IPHC Area 2A cooperating federal and state entities, and includes the individual state enforcement reports to provide more detailed information about their respective enforcement and compliance efforts. Tribal reports are provided separately.

Enforcement of the commercial, tribal and recreational Pacific halibut fisheries in International Pacific Halibut Commission Area 2A is an ongoing multi-agency effort performed cooperatively by NOAA Fisheries Office of Law Enforcement (OLE), West Coast Division (WCD), the U.S. Coast Guard (USCG), California Department of Fish and Wildlife Enforcement Division (CDFW), Oregon State Patrol Fish and Wildlife Division (OSP), Washington Department of Fish and Wildlife Police (WDFW), and Tribal Enforcement. Table 1 presents a consolidated summary of IPHC Area 2A commercial and recreational statistics for 2020 using data elements provided by OLE, USCG, CDFW, OSP, and WDFW.

Table 1. Area 2A Consolidated Enforcement Statistics -2020

| 2020 AREA 2A CONSOLIDATED ENFORCEMENT STATISTICS | | | | | | |
|---|---|---|--|---|---|----------------------|
| |  |  |  |  |  | |
| EFFORT | NOAA OLE (WCD) | USCG (D11/D13) | CDFW | OSP | WDFW | TOTAL EFFORT |
| AIRCRAFT PATROLS | | | | | | |
| Number of Patrols | | 31 | | | | 31 |
| Hours | | 117 | | | | 117 |
| VESSEL PATROLS | | | | | | |
| Number of Patrols | | 102 | | | 42 | 144 |
| Hours | | 900 | | 311 | 230 | 1441 |
| SHORESIDE PATROLS | | | | | | |
| Number of Patrols | 31 | | | | 3 | 34 |
| Hours | 167 | | 13 | 414 | 13 | 607 |
| AIRCRAFT PATROL PERSONNEL HOURS | 39 | | | | | 39 |
| VESSEL AT-SEA PERSONNEL HOURS | | | 9 | 461 | 608 | 1078 |
| SHORESIDE PERSONNEL HOURS | 167 | | 66 | 264 | 219 | 716 |
| BOARDINGS AND CONTACTS | 43 | 323 | 161 | 802 | 1,680 | 3009 |
| ACTIONS | | | | | | TOTAL ACTIONS |
| ENFORCEMENT ACTIONS | 29 | 0 | 0 | 57 | 432 | 518 |
| Compliance Assistance | 11 | | | | | 11 |
| Written Warnings | 1 | | | | 113 | 114 |
| Citations | 5 | | | | 103 | 108 |
| Warnings and Citations Combined | | | | 57 | 216 | 273 |
| Other | 12 | | | | | 12 |
| RESULTS | | | | | | TOTAL RESULTS |
| RECORDED WARNINGS/VIOLATIONS | | | | | | |
| Undersized Halibut | | 1 | | 1 | | 2 |
| Over Limit | 8 | 1 | | 6 | | 15 |
| Prohibited Gear | | | | | 3 | 3 |
| Logbook/Reporting | 3 | | | | | 3 |
| Permit/License | | | | 1 | 4 | 5 |
| Restricted/Closed Area | | | | | 27 | 27 |
| Failure to Validate Tag | | | | 7 | | 7 |
| Illegal Harvest | | | | 13 | | 13 |
| Take/Possess Groundfish with Halibut on Board | | | | 4 | | 4 |
| VMS | 8 | 3 | | | | 11 |
| Prohibited Species | | | | | 2 | 2 |
| Seabird Avoidance | 7 | | | | | 7 |
| Non-Compliance/Not Specified | 3 | | | 54 | | 57 |



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.

2020 CDFW IPHC Enforcement Efforts:

During 2020, CDFW Wildlife Officers worked joint operations with USCG and NOAA uniformed personnel during the halibut season. The CDFW 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 party boats targeting halibut between Shelter Cove and Crescent City. Numerous dockside and at-sea contacts were made where halibut were present. Offshore halibut patrols were made in combination with salmon and rockfish patrols. No violations were observed this year.

| CDFW IPHC Enforcement Statistics | | | |
|---|-------------|-------------|-------------|
| | 2020 | 2019 | 2018 |
| Participating CDFW Wardens | 9 | 11 | 11 |
| Dockside Personnel Hours | 66 | 85 | 110 |
| At-Sea Personnel Hours | 9 | 13 | 64 |
| Contacts Made (Total) | 161 | 399 | 436 |
| Commercial | 14 | 20 | 56 |
| Recreational | 147 | 379 | 380 |
| Enforcement Actions | | | |
| Warnings | 0 | 0 | 25 |
| Citations | 0 | 1 | 3 |

2020 CDFW IPHC Enforcement Highlights:

- CDFW acquired a new 38' MetalCraft Marine patrol boat for offshore fisheries patrols in the Eureka area. This boat is fully equipped with the latest electronics equipment including radar, GPS, VHF radio, night vision, auto pilot, State radio and satellite phone. The patrol boat is powered by dual 300 HP Yamaha outboard engines, and has a 375 gallon fuel capacity which gives it great range for long offshore fisheries patrols. CDFW Wildlife Officers Michael Hampton and Taylor Norris are the primary operators of this new patrol boat. This new vessel was funded jointly with CDFW and NOAA JEA funds.



- CDFW Wildlife Officer Michael Hampton's K9 Leeloo is a four-year old German Shepherd who is assigned to the Patrol Vessel Mako in Eureka, California. Leeloo is POST certified in the detection of fish, crustaceans, and mollusks. K9 Leeloo assisted with the inspection of commercial and recreational vessel inspections with the goal of locating concealed halibut. Leeloo was also deployed at local boat docks and ramps with the same goal. Leeloo's training consists of concealing fish and wildlife odors in various locations that they are likely to encounter during CDFW patrols. CDFW Officer Hampton has trained Leeloo specifically with Pacific Halibut and California Halibut odors for many hours which has made her quite proficient at detecting either odor.



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, as well as conducting collaborative enforcement efforts. OSP at-sea responsibilities include patrolling its Pacific Ocean jurisdiction, 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 2020, OSP committed seventeen commissioned staff to Pacific halibut enforcement activities, for a total of 725 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 a 93% compliance rate for recreational contacts and a 96% compliance rate for commercial vessels in 2020, as compared to 87% for recreational contacts and 94% for commercial contacts during 2019.

| OSP IPHC Enforcement Statistics | | | |
|--|-------------|-------------|-------------|
| | 2020 | 2019 | 2018 |
| Participating OSP Troopers | 17 | 13 | 23 |
| Dockside Personnel Hours | 264 | 191 | 165 |
| At-Sea Personnel Hours | 461 | 162 | 183 |
| Contacts Made (Total) | 802 | 379 | 912 |
| Commercial | 93 | 99 | 53 |
| Recreational | 709 | 280 | 859 |
| Enforcement Actions | | | |
| Warnings / Citations | 57** | 18* | 40 |

***1 federal referral**

**** 3 federal referrals**

2020 OSP IPHC Enforcement Highlights:



Fish and Wildlife Troopers conducted a boat patrol in the Pacific Ocean out of Charleston focusing on nearshore Halibut and other marine fish. During the patrol, multiple anglers were contacted, and three citations were issued for **Failing to Immediately Validate Harvest Card - Halibut.**

The Marine Fisheries Team and Newport Fish and Wildlife Troopers conducted an offshore Guardian patrol for the busy Saturday All Depth Halibut fishery. One boat was observed entering the Stonewall

Banks RCA and stop and begin fishing for halibut well inside of the Closure. The vessel was contacted and both anglers were cited. They were aware of the closure but had their plotter zoomed in too far they were unaware where they were. Multiple boats were boarded at sea and seven citations were issued for **Fail to Validate Harvest Card.**

Fish and Wildlife Troopers conducted an ocean patrol out of Depoe Bay on the opening day of recreational halibut. Fishing pressure out of Depoe Bay was nonexistent due to weather, but the troopers checked a handful of halibut boats north of Newport. One citation was issued for **Angle with More Than One Rod.**

Fish and Wildlife Troopers conducted boat patrols in Tillamook Bay and in the Pacific Ocean during a three- day halibut opener. Ocean conditions were not ideal, so a significant amount of the patrol time was conducted in Tillamook Bay. Several anglers were contacted during the patrols angling for halibut, Spring Chinook salmon, bottom fish, and crabbing from boats. Bank anglers on the Barview Jetty were also contacted during the patrol. Two of the subjects contacted had filleted their catch (one halibut and two Rock fish) while their respective boats were underway. Because the species were still easily recognizable and length/sex of the fish were not an issue, they were both warned for **Possession of Mutilated Fish.**

Fish and Wildlife Troopers conducted a boat patrol in the Pacific Ocean out of Garibaldi focusing on nearshore Halibut and marine fish. During the patrol, multiple anglers were contacted, and

various warnings were issued for **Failing to Immediately Validate Harvest Card - Halibut** and **Improper Validation of Harvest Card - Halibut**.

Fish and Wildlife Troopers conducted an ocean patrol from Garibaldi to Cannon Beach. The troopers checked numerous nearshore Halibut anglers, Rockfish anglers, and commercial Lingcod fishermen. Multiple warnings were given, and no citations were issued.

A Fish and Wildlife Trooper conducted a halibut patrol at the South Beach boat launch in Newport during the all depth halibut fishery. Angling pressure and halibut retention was slow due to poor weather conditions. During the patrol, a boat returned to the ramp with two halibut on board that were not tagged. One of the anglers did not have a combined angling tag in his possession and the other angler failed to electronically validate his tag. Two citations were issued for **Fail to Immediately Validate Harvest Card** and one warning was issued for **No Valid Angling License/Tag in Possession**.



A Fish and Wildlife Trooper worked a three-day patrol aboard the U.S. Coast Guard Cutter Robert Ward during the commercial halibut fishery. The three-day patrol covered halibut fishing areas between Newport and the California border. Multiple fishing vessels were contacted with no violations observed. A fishing vessel was contacted off Coos Bay while the crew was pulling in a longline. There were eight halibut on the deck of the vessel which were below the 32 inch minimum size limit. The captain was interviewed, and he stated he was

going to wait until they were done pulling in the longline and then measure the fish. Several of the undersized halibut had lower jaws ripped apart and all eight fish were dead. The captain was issued a citation for **Unlawful Take/Possession of Undersized Halibut**. The eight halibut were seized.

Marine Fisheries Team Troopers conducted a joint operation onboard the PV Guardian with USCG boarding team from the USCG Cutter Alert. Troopers and Coastguard personnel focused enforcement efforts on the commercial halibut opener. Multiple contacts were made. Two vessels

were found out of compliance with the new seabird avoidance rules when deploying gear to minimize impacts to seabirds. Another VMS violation was detected for a vessel fishing without transmitting required VMS positioning. The cases were referred to NOAA for enforcement action.

Troopers from the Marine Fisheries Team conducted a Guardian patrol out of Newport during the second Commercial Halibut opener. Sport anglers and commercial vessels were contacted, and compliance was high.

Members of the MFT conducted a multi-day offshore patrol on the PV Guardian from Newport to Florence to Winchester Bay. The enforcement focus was on sport halibut and sport and commercial salmon. The team also received two calls of possible infractions in the Cape Perpetua Marine Reserve which later was determined unfounded. Fishing pressure was high due to the flat ocean conditions. During that patrol, Troopers encountered numerous sport angling offenses that included the following:

- Angling Prohibited Method, Barbed Hooks
- Fail to Properly Validate Harvest Card
- Fail to Immediately Validate Harvest Card
- Aiding in a Wildlife Offense- Fail to Validate Harvest Card
- Aiding in a Wildlife Offense- Angling Barbed Hooks.
- Unlawful Possession of Canary Rockfish –Angler had caught and illegally retained a canary rockfish on an all depth Halibut day and was using cut up fillets as bait. One fillet was seized.

Fish and Wildlife Troopers conducted an offshore patrol out of Newport for a commercial halibut opener. Seven commercial fishing vessels were monitored to ensure they didn't start setting gear until the legal set time. Additionally, once gear was legally allowed to be set, the Troopers monitored the vessels to ensure they were deploying the required seabird avoidance devices for vessels retaining sablefish. One vessel had deployed avoidance gear but it was not working properly. The captain of the vessel was able to remedy the issue with the gear and was able to have a functional streamer lines for his second set of longline gear. Two vessels were found without deploying any type of avoidance devices but later it was determined they did not retain any sablefish so therefore were not required to have avoidance gear. Another vessel suspected of fishing his sablefish tier permit without having the required permit holder onboard was contacted and it was verified the permit holder was in fact onboard the vessel for that trip.

A Fish and Wildlife Trooper finished an investigation regarding a charter fishing vessel out of Newport. A complainant reported an incident that took place on May 21st in which he went on an all depth halibut trip. During the trip, he reported they angled for halibut near an area known as the "Chicken Ranch", approximately 30 miles offshore and SW of the port of Newport. During the trip he witnessed a charter vessel employee throw groundfish overboard without the use of a descender device. He reported observing approximately 12 rockfish thrown overboard that were unable to descend on their own and were seen floating on top of the water. The captain and the deckhand of the charter vessel were both interviewed and criminally cited for **Fail to Immediately Release Fish Unharmed**. During the interview, the deckhand also stated that rather than using a descender device, he has been popping the rockfish swim bladders and then releasing them in the water, so they do not float to the surface.



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.

2020 WDFW IPHC Enforcement Efforts:

| WDFW IPHC Enforcement Statistics | | | |
|---|-------------|-------------|-------------|
| | 2020 | 2019 | 2018 |
| Participating WDFW Officers | 20 | 22 | 18 |
| Dockside Personnel Hours | 219 | 299 | 110 |
| At-Sea Personnel Hours | 608 | 430 | 351 |
| Contacts Made (Total) | 1,680 | 752 | 1,444 |
| Commercial | unk | unk | 81 |
| Recreational | unk | unk | 1,363 |
| Enforcement Actions | | | |
| Warnings / Citations | 216 | 163 | 128 |

2020 WDFW IPHC Enforcement Highlights:

- 20 Officers were involved in Halibut patrols during the 2020 Halibut season
- 219.1 dockside hours worked by WDFW personnel focused on Halibut
- 33 separate patrols, 608.4 hours at-sea personnel hours were worked in support of halibut
- 245.6 patrol hours utilizing type-2 vessels, 33 total patrols (per type of vessel, i.e., long-range, medium-range, or near-shore) were used in support of halibut
- 1,680 contacts – 875 dockside, 805 via vessel. 399 individual vessels boarded, 99 vessels not in compliance.
- 216 enforcement actions were taken focused on Halibut: 113 were issued warnings, 103 were issued either a citation or an infraction. Of the above actions, 22 individual contacts were made for closed area.



Officer Cilk at the helm while Officers Baldwin and Bolt conduct sport halibut checks

Recreational Season

Officer Bolt, Officer Baldwin and Officer Cilk patrolled recreational halibut anglers in Marine Area 2 during the opener. Compliance was poor, with 16 citations issued in total. One boat with 3 anglers was found in possession of 6 halibut, despite two of the anglers not having a halibut Catch Record Card. The skipper also failed to record his halibut. The anglers were cited for No License, Fail to Record, and First-Degree Overlimit. 5 out of the 6 fish were seized. The officers also cited several other individuals for Fail to Record and several additional anglers for No License. 8 halibut in total were seized.

Eight sport halibut seized on opening day offshore of Westport by Officers Cilk, Bolt, and Baldwin.



Officer Dielman patrolled Marine Areas 2, 3, and 4 with Sergeant Rosenberger during the recreational halibut opener. Citations were written for fished in a Rockfish Conservation Area, overlimit, and FTR. Warnings were given for FTR and NLOP.

Sgt. Rosenberger on a boat found to have filleted halibut and ling cod from “yesterday” on board in addition to a limit of halibut from the current day.

Officer Bolt, Officer Cilk, and Officer Baldwin patrolled Marine Area 2 for a combined recreational salmon/halibut patrol. Compliance continued to be poor, with 13 citations issued in total. The first boat the officers contacted was fishing just off the Grays Harbor south jetty inside the closed Grays Harbor Control Zone. The four occupants had 3 Chinook salmon on board and were actively fishing. Three of the four anglers were cited for closed-season possession and their salmon (2 wild, 1 hatchery) were seized. Two other anglers in the Control Zone were cited infractions for fishing closed-season without possession, and another angler was cited for barbed hooks. Although compliance with halibut-specific regulations was slightly better than the previous week, the officers still found several vessels in violation. Two anglers were cited for No License and their halibut seized. Several anglers were cited for Failure to Record, and one angler was cited for a rockfish overlimit. The officers also contacted a vessel with four limits of halibut and four limits of rockfish on board. Officer Bolt boarded the boat to inspect their catch and found 3 closed-season yelloweye rockfish on board. The anglers claimed they could not tell the difference between a yelloweye and a canary rockfish. The yelloweye were seized for evidence and the anglers cited.



Officers Cilk, Bolt, and Baldwin with seized Chinook, yelloweye rockfish, and halibut from a very productive vessel patrol offshore of Point Chehalis.

Officers Bolt, Dielman, and Baldwin conducted a boat patrol of salmon and halibut anglers in Marine Area 2. In addition to issuing several barbed hook citations, the officers contacted and cited three groups of anglers fishing in the Westport Yelloweye Rockfish Conservation Area. One of the vessels contacted in the closure was in possession of 7 lingcod and a skate, which were seized and donated. Additional violations were handled including fishing with two poles and barbed hooks.



Officers Bolt & Baldwin with seized bottomfish Officer Baldwin boarding a boat fishing the YRCA



Officer Ariss, Officer Dielman, and Sergeant Alexander conducted a boat patrol out of Westport in MA2 on a day closed to salmon and halibut angling. They contacted very few boats, all of which were found fishing for bottomfish.

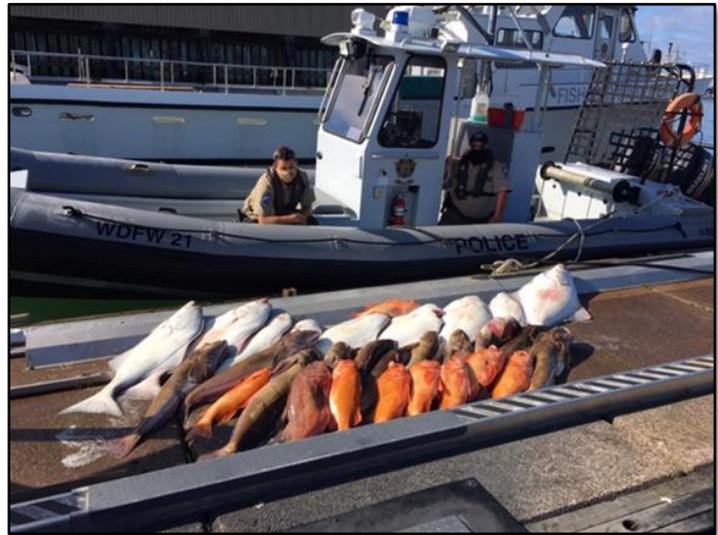
Officer Ariss aboard a halibut charter offshore of Point Chehalis.

While patrolling halibut anglers in MA 2, Officers Bolt, Cilk and Baldwin checked the Westport Yelloweye Rockfish Conservation Area and the South Coast Yelloweye Rockfish Conservation Area. Several anglers were warned for fishing in the closure.

Officers Dielman and Cilk patrolled Marine Area 2 during a recreational halibut opener. They contacted 5 vessels fishing in the YRCA. All five vessels had the YRCA pre-programmed into their GPS units. The captains

of the vessels were cited and the fish seized. The total take was 10 halibut, 11 lingcod, 7 canary, one bocaccio, and one yelloweye. The haul of fish was so large it more than filled the fish box on DFW #21. The fish were donated to the local mission.

Officers Dielman and Cilk with seized halibut and bottomfish caught in the YRCA offshore of Westport.



Officers Dielman and Cilk were attempting to contact a vessel heading in from the halibut grounds. The vessel was travelling at a high rate and the officers pulled alongside. One subject, who is a known offender came out on deck while the boat was still underway. The vessel turned sharply in front of the patrol boat and Officer Cilk needed to react quickly to avoid a collision. The subject on the deck then dumped the contents of a 5-gallon bucket over the far side of the boat. Officer Dielman observed what appeared to be white fillets sinking to the bottom. Once on board, the subjects denied dumping anything. Two of their three halibut were unrecorded. They were cited for this and charges for fail to submit will be forwarded to the prosecutor.

2019 Case Not Previously Reported

Detachments 2 & 3 conducted joint JEA patrols with USCG and NOAA for the tightly regulated commercial halibut opener in MA1. Oregon and California were also joint participants along their respective coasts. The effort included dockside inspections for the subsequent offloads. While investigating suspicious circumstances surrounding a late commercial halibut offload in Westport, Sgt. John found the skipper had caught his halibut within a rockfish conservation area closure. The offload of 132 halibut was seized.



Commercial offload of 132 closed area halibut seized by Sgt. John in Westport

Detachment 8 Officers conducted boat patrols in Marine Areas 3 and 4 for the second weekend of halibut opening on the northern coast of Washington. Anglers were largely successful, but not everyone was following the rules in the process. Anglers were cited for a variety of violations, including not having purchased their halibut catch record card to begin with, not having their CRC on their person, failure to record their catch, possession of rockfish outside of the 20 fathom line, and possession of yelloweye rockfish.

Two cases of note for the patrol was a recreational vessel bottom fishing beyond the 20 fathom line for bottomfish. As the officers approached they observed two yelloweye rock fish floating next to the opposite side of the vessel. The men onboard the vessel had conflicting stories on whether they were targeting salmon (legal area/but using unlawful gear), or fishing for bottomfish (closed area). The men claimed to have descended the yelloweye rockfish, but the fish had just happened to pop up within 15 feet of their boat. The men were found to have several rockfish and a lingcod aboard the vessel. The three men will be cited criminally for fishing for groundfish in a closed area.



They cited anglers for possession of closed area rockfish, undersized cabezon, fishing for salmon with two poles, amongst other violations. Officers investigated a Charter vessel returning from the ocean side of Marine Area 4 that was closed to Halibut fishing. The vessel was contacted as it just passed through the cut by Tatoosh Island. The two men aboard the vessel showed the Sgt. limits of ocean rockfish, one cabezon and one lingcod. When the Sgt. asked

the men if there was any fish aboard in the holds of the vessel the men stated that they had 2 halibut which they had previously caught in Marine Area 5. (Marine Area 5 was open for

halibut that day, but Marine Area 4 was not.) The Sgt. advised the men that he did not believe their story, but even if they had caught the halibut in Marine Area 5 that morning it would be unlawful to fish in a Marine Area closed to halibut fishing with halibut onboard. The halibut were seized and the investigation ongoing. The violations being investigated included retaining over the annual limit of halibut, closed area halibut fishing/possession, and providing false information. Both men have been under investigation for similar violations in the past.

Officer Dielman and Sgt. Rosenberger patrolled out of La Push for three days working the Ocean recreational halibut opener. One of the first vessels contacted Thursday contained nine anglers who had claimed to have retained their limits of halibut. Only two of the halibut had been recorded on catch record cards. The skipper of the vessel failed to have his license or catch record card on him, and Sgt. Rosenberger's inspection yielded a total of 10 halibut onboard for the nine anglers. The skipper claimed responsibility for the over limit (same skipper from the closed area investigation above). The anglers will all be cited through the mail for the violations. The illegal halibut were seized. Other violations found over the patrol included possessing more than one daily limit of halibut onboard a vessel, fail to record halibut, and no license on persons.



Commercial Fishery

Detachments 2 and 3, USCG, NOAA, CA, and OR worked joint patrols in their respective states for the second three-day round of the coastal commercial halibut season. Local officers appreciated the assistance of travelling officers Murry and Ward. Detachment 2 operated the P/V Corliss out of Westport, while Detachment 3 officers operated the P/V 29' RHIB out of Ilwaco. One vessel encountered a number of yellow-eye rockfish and a vessel was failing to comply with new sea bird protection regulations.



A number of rockfish, many of which were yellow-eye, encountered by a directed halibut vessel. Sgt. Alexander with two large examples recovered by the P/V Corliss.



Officers Dielman, Jacobson, Murray, and Ward monitoring a commercial halibut violator making a weak attempt at complying with new bird protection rules – after noticing enforcement presence.

Detachments 2 and 3 worked planned joint patrols with NOAA, USCG, OR, and CA for the annual Pacific Coast commercial halibut season opener. Officer Dielman, SO Ariss, and Sgt. John conducted a boat patrol on the opener's south WA coast, while Officer Cilk, Officer Baldwin, and Sgt. Alexander conducted a boat patrol on the WA central coast. Participation in the fishery was low due to poor COVID19 impacted markets and low quotas. Education was provided on the new seabird avoidance gear rules implemented for groundfish protection. Officer Jacobson monitored several commercial halibut off loads in Ilwaco issuing one verbal warning for a small over quota limit. The overage was seized by WDFW.



Officer Dielman piloting one of WDFW’s coastal 29’ RHIBs during the commercial halibut opener off the WA south coast.

Officer Dielman, SO Ariss, and Sgt. John patrolled Marine Area 1 during the commercial halibut opener. An otherwise routine patrol was interrupted when they attempted to contact a commercial tuna boat headed back towards the Columbia River. Upon approaching, the officers heard a loud “pop”. The officers tried numerous times to contact the operator of the vessel without success. They could not see the operator anywhere in the cabin, he would not respond to radio calls, and did not appear when the patrol vessels sirens were activated. After several minutes, the operator was contacted via radio and Officer Dielman and SO Ariss boarded the vessel. The operator eventually explained he had purchased a new gun and shot it into the water. He then realized his vessel was leaking diesel and had been down in the engine room, thereby unable to hear the radio and sirens.

Officer Dielman and SO Ariss contacting a commercial fishing vessel offshore of the Columbia River Bar after officers heard a gunshot on board.



Detachments 2 and 3 teamed up to patrol the third commercial halibut opener. The detachments worked joint patrols with USCG, NOAA, CA, and OR in their respective states. The P/V Corliss out of Westport and the P/V 29' RHIB out of Ilwaco were utilized. In addition to halibut vessels, tuna and salmon trollers, and sport salmon vessels were also contacted or boarded. Dockside halibut offloads were also monitored.



Officer Dielman piloting the P/V 29' RHIB while Officer Bolt prepares to jump back on board after boarding a commercial halibut vessel miles offshore of Cape Disappointment. Timing and a steady operator is everything.

Detachments 2 and 3 teamed up for the fourth commercial halibut opener as well as the sport halibut opener. Commercial halibut patrols were a joint effort with NOAA, USCG, OR, and CA in their respective states. Sport halibut efforts were focused primarily in MA2 out of Westport where activity was greatest and opportunity for sport salmon was still available. Violations were found and fish seized in both sport fisheries.



Officer Cilk at the helm of the P/V View from the deployed tender on the right. G.H. Corliss on commercial halibut patrol offshore of Point Chehalis.



NOAA Fisheries Office of Law Enforcement – West Coast Division

The primary objective of OLE's IPHC enforcement effort is to ensure compliance with the commercial and recreational fishery regulations so there is trust in the integrity of the fishery and the resource is protected for generations to come.

During 2020, OLE's West Coast Enforcement Division (WCD) continued to work closely with JEA partners and the USCG to monitor activity associated with Pacific halibut fisheries, pursuant to IPHC regulations. As one of its annual enforcement priorities, OLE-WCD Enforcement Officers, along with JEA partners from WDFW, OSP, and CDFW, conducted patrols and vessel boardings, primarily focused in support of enforcement efforts associated with the Area 2A Pacific halibut directed commercial fishery.

2020 WCD IPHC Enforcement Efforts:

OPERATION FLATFISH FRENZY

This annual enforcement effort is planned and executed annually in support of the IPHC Area 2A Commercial Directed Fishery. NOAA OLE WCD, USCG District 11 and District 13, CDFW, OSP, and WDFW coordinated efforts and provided assets and personnel to ensure compliance during Area 2A Directed Halibut Derbies on June 22-24, July 6-8, and subsequent derbies every other week until the quota was attained.



NOAA supervisory enforcement officer and USCG crew from Sector North Bend after a successful flight monitoring the start time of the first day of the derby.

ENFORCEMENT CONCERNS:

- This was the first year the directed commercial fishery was changed from a series of 10 hour openers to 54 hour openers.
- This was the first year vessels targeting both halibut and groundfish were required to use Seabird Avoidance Gear when setting gear (new regulations apply to longline groundfish fishery).
- Due to the lower profit margins and low per-vessel limits, there was an increased concern of overages, retention of undersize halibut and illegal bycatch, and over-the-gunwale, dark-of-night transfers.
- Ensuring the safety of the fishing community and enforcement personnel due to COVID-19.

TARGET ACTIVITY AREA:

- Along the 100-150 fathom curve off Grays and Astoria Canyons, Heceta and Stonewall Banks, and the Bandon High Spot.

FEDERAL AND STATE ASSETS PROVIDED AND ACTIVITIES CONDUCTED:

- **OLE WCD**
 - Provided Enforcement Officers (EOs) for aircraft and shoreside enforcement activities alongside USCG and state personnel.
- **USCG**
 - Conducted daily C-27 fixed wing air patrols.
 - Conducted helicopter air patrols from Astoria, Newport, and North Bend with NOAA riders.
 - Conducted vessel patrols on the WAHOO, CUTTYHUNK, ALERT, ORCAS, ROBERT WARD, and DORADO.
- **OSP**
 - Deployed GUARDIAN out of Newport and provided shoreside presence.
- **WDFW**
 - Deployed 2 RIBs out of Westport and Ilwaco, and provided shoreside presence.

NOAA enforcement officer inspecting catch



West Coast Division Overview

Staffing Snapshot

41 Full-Time Employees

- 14 Special Agents
- 12 Enforcement Officers
- 7 Mission Support
- 7 Investigative Support
- 1 Compliance Liaison
- 1 Contractor

Annual Budget:

\$8.3 million

Headquarters

7600 Sand Point Way NE
Seattle, WA 98115

Field Offices

Alameda, CA

Arcata, CA

Astoria, OR

Bellingham, WA

Coos Bay, OR

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 western region of the continental United States; primarily California, Idaho, Oregon and Washington. The WCD's area of responsibility also includes the inland states of Arizona, Colorado, Montana, Nevada, North Dakota, South Dakota, Utah, and Wyoming.

The northwestern states of Washington, Idaho, Montana, and North Dakota share an international border with Canada that spans a distance of 1,327 miles; California and Arizona's international border with Mexico in the southwest covers a distance of 513 miles. Combined, California, Oregon, and Washington include 1,293 miles of Pacific Ocean coastline, 7,863 miles of tidal shoreline, 5 National Marine Sanctuaries, 290 Marine Conservation Areas, 21 major international seaports, and 18 international airports. Federal jurisdiction in the U.S. Pacific Coast Region encompasses an Exclusive Economic Zone (EEZ) of over 222,471 square nautical miles, a landmass of 339,375 square miles with numerous rivers and tributaries flowing into the Pacific Ocean, and the U.S. waters of the Strait of Juan de Fuca and Puget Sound in the Salish Sea.

WCD staff is comprised of Special Agents, Enforcement Officers, support, and administrative personnel working at the WCD main office in Seattle, or in field offices in California, Oregon, and Washington. OLE staff perform duties under three general job classifications: 1) Operational - which includes the Special Agents (SAs) and Enforcement Officers (EOs), 2) Investigative Support - consisting primarily of Investigative Support Technicians, and 3) Mission Support - made up of administrative and information technology staff.

WCD SAs and EOs are posted in two geographic regions: for SAs, District One incorporates the states of Washington and Oregon; and District Two covers California. Both districts are assigned a supervisory Assistant Special Agent-in-Charge (ASAC) to oversee the seven SA positions allotted in each district. Four of the seven SA positions in District One are currently staffed; and four of the seven positions are filled in District Two.

Similarly, EOs in Patrol North provide uniformed enforcement services for Washington and Oregon; and Patrol South EOs cover California. Future plans call for a total of fifteen uniformed officers operating in two patrol districts; each with its own Supervisory Enforcement Officer (SEO). Both Patrols are assigned a supervisory Enforcement Officer (SEO) to oversee six positions in the North and seven positions in the South. Five of the six position in Patrol North are currently staffed; and four of the seven positions are filled in Patrol South.

The Investigative Support Team is fully staffed and provides 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 was monitored and post-commercial open period landing data was audited to verify compliance. The WCD Investigative Support team identified fifteen VMS declaration discrepancies and other potential violations of the IPHC regulations that occurred during Area 2A directed commercial Pacific halibut fishing periods in 2020.

Currently there are 12 vacancies in the WCD due to retirements, relocations, and professional advancements. At 86% of its current staffing allotment, OLE is continues to fulfill its critical missions; and is making significant progress in filling vacancies as budgetary and HR resources will allow.

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.

JEA execution priorities, as well as funding, performance, and reporting requirements, are formally defined for each JEA on an annual basis. The performance threshold for 2020 JEAs required state partners to direct a minimum of 75% toward execution priorities designated by OLE, and assign the remaining 25% to other general enforcement and compliance priorities. 2020 NOAA CEP federal funding in the WCD totaled \$2.651M, a .7% increase from 2019. CEP funding is equitably distributed to the three state partner agencies based on the three-year average provided for the years 2015 to 2018.

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.



NOAA Enforcement Officer Observing Fishing Vessel during USCG Air Patrol

APPENDIX III

Alaska Department of Fish and Game

Department of Fish and Game

333 Raspberry Road
Anchorage, Alaska 99518-1565
Division of Subsistence: 907.267.2353
Division of Sport Fish: 907.267.2294

DATE: 12/15/2020

CONTRACTING PARTY: UNITED STATES OF AMERICA

AGENCY: Alaska Department of Fish and Game

Sarah Webster

Fishery Biologist – Division of Sport Fish

sarah.webster@alaska.gov

907-267-2212

Lauren Sill

Subsistence Resource Specialist –Subsistence Section

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907-465-3617

FISHERY SECTORS

Recreational and Subsistence

IPHC REGULATORY AREAS

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

DISCUSSION

Recreational

In October 2020, the Alaska Department of Fish and Game provided final estimates of the 2019 sport harvest and preliminary estimates of the 2020 sport harvest for Areas 2C, 3A, 3B, and 4. The full report is in Attachment 1.

2019 Final Harvest Estimates

The Area 2C charter fishery allocation for 2019 was 0.82 Milb (harvest and release mortality). Regulations included a one-fish bag limit with a 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 1.89 Milb (harvest and 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 to halibut retention on Wednesdays all year, five Tuesday closures (7/16 thru 8/13), 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 is no prohibition on retention of halibut by captains or crew. Unguided fisheries statewide were managed under a bag limit of two fish of any size.

The 2019 Area 2C estimated sport harvest (excluding release mortality) was 131,410 fish, for a yield of 1.831 million pounds. 2C charter removals (including release mortality) were estimated to be 0.697 Mlb. Unguided removals were estimated to be 1.183 Mlb. The Area 3A estimated sport harvest was 246,804 fish, for a yield of 3.718 Mlb. 3A charter removals were estimated to be 2.054 Mlb. Unguided removals were estimated to be 1.705 Mlb. Areas 3B and 4 do not have separate charter allocations. The final harvest estimates were 712 halibut in Area 3B and 983 halibut in Area 4. Applying the unguided average weight from Kodiak of 16.92 lb resulted in yield estimates of 0.012 Mlb in Area 3B and 0.017 Mlb 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 Attachment 1. Information on harvest by port and historical harvest can be found in Area 2C and 3A Final 2019 Charter Harvest Estimates (North Pacific Fisheries Management Council 2020).

2020 Preliminary Harvest Estimates

The Area 2C charter fishery allocation for 2020 was 0.78 Mlb. Regulations included a one-fish bag limit with a reverse slot limit of less than or equal to 40 inches and greater than or equal to 80 inches through June 14, then changed June 15 by emergency action due to the COVID-19 pandemic to a one-fish bag limit with a reverse slot limit of less than or equal to 45 inches and greater than or equal to 80 inches for the remainder of the year. The Area 3A charter allocation was 1.71 Mlb. Regulations through June 14 included a two-fish bag limit with a maximum size on one of the fish of 26 inches, a limit of one trip per charter vessel per day and per CHP per day, a closure to halibut retention on Tuesdays and Wednesdays, and a 4-fish annual limit with a recording requirement. Regulations were changed by emergency action on June 15 and included a two-fish bag limit with a maximum size on one of the fish of 32 inches and limits of one trip per charter vessel per day and per CHP per day; there were no closure days or annual limits after the regulation change. 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 bag limit of two fish of any size.

The preliminary estimates of 2020 charter harvest (excludes release mortality) and removals (includes release mortality) in 2C were estimated to be 37,415 fish and 0.500 Mlb, respectively. Unguided removal estimates in 2C used time series forecasts that did not account for any differences that may have occurred in 2020 due to the COVID-19 pandemic. Unguided harvest and removals in 2C were estimated to be 61,960 fish and 1.160 Mlb. The preliminary estimates of charter harvest and removals in 3A were estimated to be 108,379 fish and 1.597 Mlb. Unguided removal estimates in 3A used the same methods as 2C and did not account for the COVID-19 pandemic. Unguided harvest and removals in 3A were estimated to be 109,298 fish and 1.700 Mlb. The preliminary harvest estimates for 2020 in Areas 3B and 4 also did not account for the pandemic and were 595 halibut in Area 3B and 863 halibut in Area 4. Applying the unguided average weight from Kodiak of 18.40 lb resulted in removal projections of 0.011 Mlb in Area 3B and 0.016 Mlb 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 Attachment 1.

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 27 October 2020 and results were presented at the North Pacific Fisheries Management Council meeting in December. Projected removals in 2021 under status quo regulations in the absence of continued impacts of the COVID-19 pandemic are 1.03 Mlb in 2C and 2.92 Mlb in 3A. Under the suite of management measures recommended by the Council at the December 2020 meeting, including a recommended reduction in effort projections of 35% in 2C and 25% in 3A to account for continued impacts of the pandemic, removal projections range from 0.645 to 0.786 Mlb for 2C and from 1.784 to 1.853 for 3A.

A full report of the analyses and results can be found in Analysis of Charter Management Options for the Area 2C and 3A charter halibut fisheries for 2021 (Webster and Powers 2020).

Subsistence

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). Results from this study were included in the AM096 documents.

Due to budget constraints, a survey to estimate subsistence halibut harvests in Alaska in 2019 did not take place. The grant between NOAA and the Division of Subsistence was extended and supplemented with funding to support developing a subsistence halibut harvest estimate for Alaska for 2020. The first round of mailed surveys to all Subsistence Halibut Registration Certificate (SHARC) holders will go out in January 2021, followed by two more surveys to non-respondents. We will report preliminary results at AM098 (January 2022).

REFERENCES

Fall, J.A. and D. Koster. 2020. Subsistence Harvests of Pacific Halibut in Alaska, 2018. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 456. Anchorage.

North Pacific Fisheries Management Council. 2020. Area 2C and 3A final 2019 charter halibut harvest estimates. Retrieved 09 December 2020, from <https://www.npfmc.org/halibut-charter-management/charter-management-committee/>

Webster, S. and R. Powers 2020. Analysis of management options for the Area 2C and 3A charter halibut fisheries for 2021: A report to the North Pacific Fishery Management Council, December 2020. Alaska Department of Fish and Game. Agenda item C3. Unpublished. Retrieved 09 December 2020, from <https://meetings.npfmc.org/Meeting/Details/1745>

ATTACHMENTS

Attachment 1 – 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 2 – Summary of Subsistence Harvests of Pacific Halibut in Alaska, 2018

Attachment 1



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

DIVISION OF SPORT FISH

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October 30, 2020

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 2019 estimates of sport fishery harvest and yield by IPHC regulatory area,
2. Preliminary 2020 estimates of harvest and yield by IPHC area,
3. Final 2019 and preliminary 2020 estimates of sport fishery release mortality by IPHC area, and
4. Final 2019 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.2019.05.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.2020.04.pdf>

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

Sincerely;

(sent via email)

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

Final Estimates of 2019 Sport Harvest and Yield

In October 2019 we provided preliminary estimates of the 2019 sport harvest for Areas 2C, 3A, 3B, and 4. This letter provides final estimates of the 2019 sport harvest based on Alaska Department of Fish and Game (ADF&G) saltwater logbook data as of September 17, 2020, 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 website.

The Area 2C charter fishery regulations for 2019 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 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 to halibut retention on Wednesdays all year, five Tuesday closures (7/16 thru 8/13), 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 bag limit of two fish of any size; there was no prohibition on retention of halibut by captains or crew. Unguided fisheries statewide were managed under a bag limit of two fish of any size.

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 in port. 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 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. 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 = 116). In 2019, 76 halibut were estimated from Area 3A locations in Area R.

Results:

The 2019 Area 2C estimated sport harvest (excluding release mortality) was 131,410 fish, for a yield of 1.831 million pounds (Table 1). Charter yield represented 36% of the total. Average net weight was estimated at

13.93 lb overall and was lower for the charter sector due to size limit restrictions. Average weight was estimated from samples of 4,160 charter halibut and 3,771 unguided halibut.

The Area 3A estimated sport harvest was 246,804 fish, for a yield of 3.718 Mlb (Table 1). The charter sector accounted for 55% of the total yield. Average net weight was estimated at 15.06 lb overall and was slightly lower for the charter sector. Average weight was estimated from samples of 4,754 charter halibut and 2,449 unguided halibut.

The final estimates of charter halibut yield were about 4.5% higher than last year's preliminary estimate in Area 2C and 1.8% 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 2.9% higher than the preliminary estimate in Area 2C and 2.8% higher 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 interannual variability in the harvest time series.

The final harvest estimates for western areas were 712 halibut in Area 3B and 983 halibut in Area 4 (Table 1). Applying the Kodiak unguided average weight of 16.92 lb resulted in yield estimates of 0.012 Mlb in Area 3B and 0.017 Mlb in Area 4. These final estimates were up from last year's preliminary estimates of 0.004 in Area 3B and 0.014 in Area 4.

Preliminary 2020 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 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 estimated using partial-year logbook data. Logbook data were entered and available in mid-October for most trips taken through August 31. Harvest data were corrected to account for late logbook submissions and other reporting errors based on past data and assumptions. This adjusted the harvest in Area 2C by 2.6% and in 3A by 2.4%. Harvest and standard errors for the months of September through December were assumed to be the 6-year average of harvest in those months (average since the CSP was implemented). Average harvest in September – December was used due to the disproportionate effort throughout the 2020 season and because known harvest to date exceeded estimates from time series forecasts. Use of averages increased harvest estimates by about 8% in each area.

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. This likely over estimated harvest in 2020 due to expected changes in effort related to the COVID-19 pandemic, especially with respect to non-resident anglers due to interstate travel mandates. Unguided harvest data for 2020 will be available in the fall of 2021 and estimates will be updated at that time.

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. The estimates of charter average weight for Homer, Seward, and Whittier were stratified to account for differences in sizes of halibut cleaned at sea and cleaned in port in 2020. No sampling was conducted in Areas 3B or 4 in 2020, so the Kodiak area average weight from the unguided fishery was again substituted for these areas. Additionally, there were no samples from the charter sector in the 3A portion of SWHS Area G due to the absence of a port sampler in Elfin Cove in 2020, so the Yakutat area (SWHS Area H) average

weight from the charter fishery was substituted for this area; Yakutat was the nearest port in Area 3A from which samples were obtained.

Results:

The preliminary estimate of 2020 sport halibut harvest in Area 2C (excluding release mortality) was 99,375 halibut, or 1.622 Mlb (Table 2). Average weight was estimated at 16.32 lbs. The charter average weight was more than 5.7 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 2,272 charter halibut and 3,553 unguided halibut.

The preliminary estimate for Area 3A was 217,677 halibut, for a total sport fishery yield of 3.257 Mlb (Table 2). The estimated average weight in Area 3A was 14.96 lbs overall. Average weights were estimated from samples of 4,663 charter and 1,888 unguided halibut.

The preliminary harvest estimates for 2020 were 595 halibut in Area 3B and 870 halibut in Area 4. Applying the unguided average weight of 18.40 lbs from Kodiak resulted in yield projections of 0.011 Mlb in Area 3B and 0.016 Mlb 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 2019 and Preliminary 2020 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 2019 were based on final logbook data. The numbers of halibut released in 2020 used data through August from the charter logbooks and the average number of releases from logbooks since the CSP was implemented. For the unguided fishery and the overall sport fisheries in Areas 3B and 4, the estimated number of fish released in each subarea in 2019 was obtained from the SWHS. The projections for 2020 were simple exponential time series forecasts using previous release numbers from the SWHS. This likely over estimated releases in 2020 due to expected changes in effort related to the COVID-19 pandemic, as mentioned above.

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 and average weight was calculated using the IPHC length-weight relationship.

For the Area 2C charter fishery, additional steps were needed to estimate release mortality due to the reverse slot limits in place in 2019 and 2020. In 2019, 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 2019 size classes were U38 (≤ 38 inches), 38-80, and O80 (≥ 80 inches); the 2020 size classes were U45 (≤ 45 inches), 45-80, and O80 (≥ 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 or U45 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 small fish released but overestimate average weight. Because the model assumes that the percent of fish kept at length never exceeds 95%, it may also overestimate the numbers of large fish released, but probably has little effect on their average weight.

Results:

For 2019, estimated release mortality was 0.050 Mlb in Area 2C, with 0.035 Mlb from the charter fishery. The size class breakdown of the Area 2C charter release mortality indicated that while the majority of fish released were in the U38 length range, the poundage of release mortality was greatest in the O38-U80 range because of the higher average weight (Table 4). Estimated release mortality in Area 3A was 0.042 Mlb, with 0.019 Mlb from the charter fishery (Table 3). Areas 3B and 4 each had negligible amounts of release mortality from the sport fishery.

For 2020, estimated release mortality was 0.037 Mlb in Area 2C, 0.040 Mlb in Area 3A, and virtually zero in Areas 3B and 4 (Table 5). The size class breakdown of the Area 2C charter release mortality indicated that while the majority of fish released were in the U45 length range, the poundage of release mortality was greatest in the 45-80 inch range because of the higher average weight (Table 4).

The 2019 total sport fishery removals, including harvest and all sizes of release mortality, was 1.881 Mlb in Area 2C and 3.759 Mlb in Area 3A. Release mortality made up 2.7% of all Area 2C removals and 1.1% of Area 3A removals in 2019. For 2020, the preliminary estimates of total sport removals are 1.659 Mlb in Area 2C and 3.297 Mlb in Area 3A. Release mortality accounted for 2.3% of Area 2C removals and 1.2% of Area 3A removals in 2020.

Sport Fishery Yield Prior to the Mean IPHC Survey Dates in 2019 (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 2019 were July 11 in Area 2C and July 1 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 2019 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 2019 final estimated harvests in each subarea to derive the overall

Lara Erikson

- 6 -

October 30, 2020

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 2019, an estimated 0.745 Mlb of halibut were taken by the sport fishery in Area 2C prior to July 11, and an estimated 1.324 Mlb were taken in Area 3A prior to July 1 (Table 6).

Lara Erikson

- 7 -

October 30, 2020

Table 1. Final 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 | 70,600 | 9.38 | 0.662 | 0.622 – 0.702 |
| | Unguided | 60,810 | 19.22 | 1.169 | 1.022 – 1.315 |
| | Total | 131,410 | 13.93 | 1.831 | 1.679 – 1.982 |
| Area 3A | Charter | 139,082 | 14.64 | 2.036 | 1.901 – 2.170 |
| | Unguided | 107,722 | 15.62 | 1.682 | 1.489 – 1.875 |
| | Total | 246,804 | 15.06 | 3.718 | 3.483 – 3.953 |
| Area 3B | Total | 712 | 16.92 ^a | 0.012 | NA |
| Area 4 | Total | 983 | 16.92 ^a | 0.017 | 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 2020 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 | 37,415 | 12.75 | 0.477 | 0.455 – 0.499 |
| | Unguided | 61,960 | 18.47 | 1.144 | 0.901 – 1.387 |
| | Total | 99,375 | 16.32 | 1.622 | 1.378 – 1.865 |
| Area 3A | Charter | 108,379 | 14.60 | 1.583 | 1.493 – 1.673 |
| | Unguided | 109,298 | 15.32 | 1.674 | 1.363 – 1.986 |
| | Total | 217,677 | 14.96 | 3.257 | 2.933 – 3.581 |
| Area 3B | Total | 595 | 18.40 ^a | 0.011 | NA |
| Area 4 | Total | 870 | 18.40 ^a | 0.016 | NA |

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

Lara Erikson

- 8 -

October 30, 2020

Table 3. Final 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 | Sector | Estimated No. Halibut Released | Assumed Mortality Rate | Number Released that Died | Estimated Average Net Weight (lb) | Release Mortality (Mlb) |
|-----------|----------|--------------------------------|------------------------|---------------------------|-----------------------------------|-------------------------|
| Area 2C | Charter | 33,908 | 6.0% | 2,034 | 17.26 | 0.035 |
| | Unguided | 30,003 | 7.0% | 2,100 | 7.07 | 0.015 |
| | Total | 63,911 | | 4,135 | 12.08 | 0.050 |
| Area 3A | Charter | 55,963 | 5.0% | 2,798 | 6.68 | 0.019 |
| | Unguided | 57,814 | 6.0% | 3,469 | 6.59 | 0.023 |
| | Total | 113,777 | | 6,267 | 6.63 | 0.042 |
| Area 3B | Total | 1,021 | 6.0% | 61 | 9.08 | 0.001 |
| Area 4 | Total | 624 | 6.0% | 37 | 6.58 | 0.000 |

Table 4. Breakdown of Area 2C estimates of charter release mortality by size class for 2019 (final) and 2020 (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) |
|------|---------------------|--------------------------------|------------------------|---------------------------|-----------------------------------|-------------------------|
| 2019 | U38 | 26,361 | 6.0% | 1,582 | 6.69 | 0.011 |
| | O38U80 | 7,297 | 6.0% | 438 | 47.66 | 0.021 |
| | O80 | 249 | 6.0% | 15 | 244.70 | 0.004 |
| | Total | 33,908 | 6.0% | 2,034 | 17.26 | 0.035 |
| 2020 | U45 | 17,803 | 6.0% | 1,068 | 8.46 | 0.009 |
| | O45U80 | 2,775 | 6.0% | 166 | 62.63 | 0.010 |
| | O80 | 195 | 6.0% | 12 | 244.70 | 0.003 |
| | Total | 20,772 | 6.0% | 1,246 | 17.91 | 0.022 |

Lara Erikson

- 9 -

October 30, 2020

Table 5. Preliminary estimates of release mortality for sport fisheries in Areas 2C, 3A, 3B, and 4 in 2020. Some columns may not appear to add correctly due to rounding.

| IPHC Area | Sector | Estimated No. Halibut Released | Assumed Mortality Rate | Number Released that Died | Estimated Average Net Weight (lb) | Release Mortality (Mlb) |
|-----------|----------|--------------------------------|------------------------|---------------------------|-----------------------------------|-------------------------|
| Area 2C | Charter | 20,772 | 6.0% | 1,246 | 17.91 | 0.022 |
| | Unguided | 30,950 | 7.0% | 2,166 | 6.99 | 0.015 |
| | Total | 51,722 | | 3,413 | 10.98 | 0.037 |
| Area 3A | Charter | 38,028 | 5.0% | 1,901 | 7.28 | 0.014 |
| | Unguided | 65,732 | 6.0% | 3,944 | 6.53 | 0.026 |
| | Total | 103,760 | 5.6% | 5,845 | 6.77 | 0.040 |
| Area 3B | Total | 754 | 6.0% | 45 | 9.53 | 0.000 |
| Area 4 | Total | 564 | 6.0% | 34 | 6.74 | 0.000 |

Table 6. Final estimated sport harvest prior to the mean IPHC survey dates in 2019 in Areas 2C and 3A.

| Area | Mean Survey Date | Charter | | Unguided | | Total | |
|------|------------------|---------|---------------|----------|---------------|---------|---------------|
| | | Percent | Harvest (Mlb) | Percent | Harvest (Mlb) | Percent | Harvest (Mlb) |
| 2C | July 11 | 36.3% | 0.241 | 43.2% | 0.504 | 40.7% | 0.745 |
| 3A | July 1 | 31.4% | 0.638 | 40.8% | 0.686 | 35.6% | 1.324 |

Attachment 2



SUBSISTENCE HARVESTS OF PACIFIC HALIBUT IN ALASKA, 2018

Division of Subsistence, Alaska Department of Fish and Game
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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/st/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.

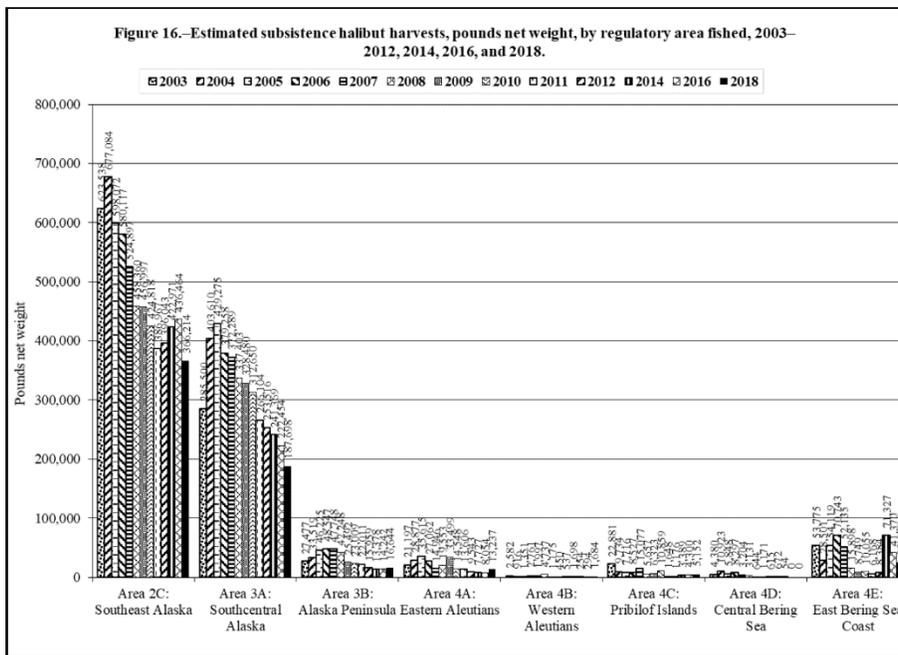
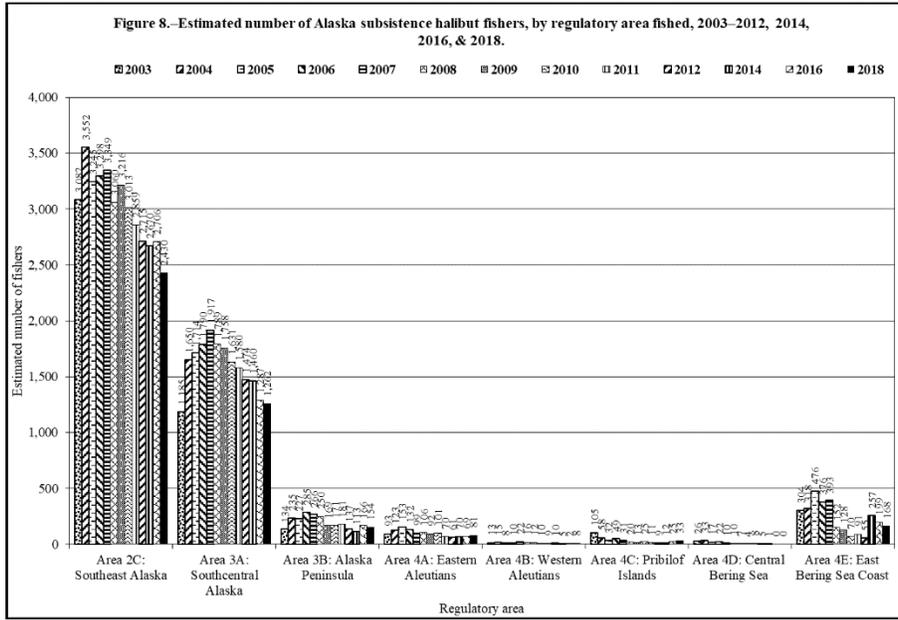
| Subarea | Regulatory area | Estimated subsistence harvest by gear type | | | | | | | | | | | | | |
|---------------------------|-----------------|--|------------------------------|------------------------------------|---|---------------------------------|------------------------------------|---|------------------------------|------------------------------------|---|------------------------------|------------------------------------|---|--|
| | | Setline gear ^a | | | | Hand-operated gear ^a | | | | All gear | | | Estimated sport harvest | | |
| | | Number of SHARCs subsistence fisher ^c | Estimated number respondents | Estimated number halibut harvested | Estimated pounds halibut harvested ^b | Estimated number respondents | Estimated number halibut harvested | Estimated pounds halibut harvested ^b | Estimated number respondents | Estimated number halibut harvested | Estimated pounds halibut harvested ^b | Estimated number respondents | 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 | 1,203 | 8,758 | 207,509 | 725 | 2,253 | 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 | 346,214 | 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 | 25,929 | 82 | 314 | 6,115 | 248 | 1,525 | 31,143 | 108 | 280 | 6,395 | |
| Cook Inlet | 3A | 299 | 136 | 1,089 | 20,135 | 149 | 1,180 | 14,503 | 299 | 2,269 | 34,638 | 133 | 583 | 7,908 | |
| Kodiak Island road system | 3A | 437 | 416 | 2,880 | 55,291 | 155 | 413 | 7,214 | 437 | 3,293 | 64,415 | 279 | 760 | 14,639 | |
| Kodiak Island other | 3A | 400 | 344 | 1,880 | 32,833 | 175 | 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 | 187,498 | 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 | 15,861 | 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 | 7,951 | 35 | 155 | 4,437 | 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 | 8,657 | 38 | 168 | 4,531 | 81 | 474 | 13,237 | 50 | 162 | 3,084 | |
| Western Aleutians--east | 4B | 8 | 5 | 21 | 1,505 | 5 | 6 | 178 | 8 | 56 | 1,684 | 5 | 8 | 261 | |
| | 4B Total | 8 | 5 | 21 | 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 | 83 | 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 | | 4,994 | 3,417 | 21,782 | 489,721 | 1,645 | 8,210 | 135,058 | 4,094 | 29,962 | 615,789 | 1,942 | 6,770 | 125,505 | |

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

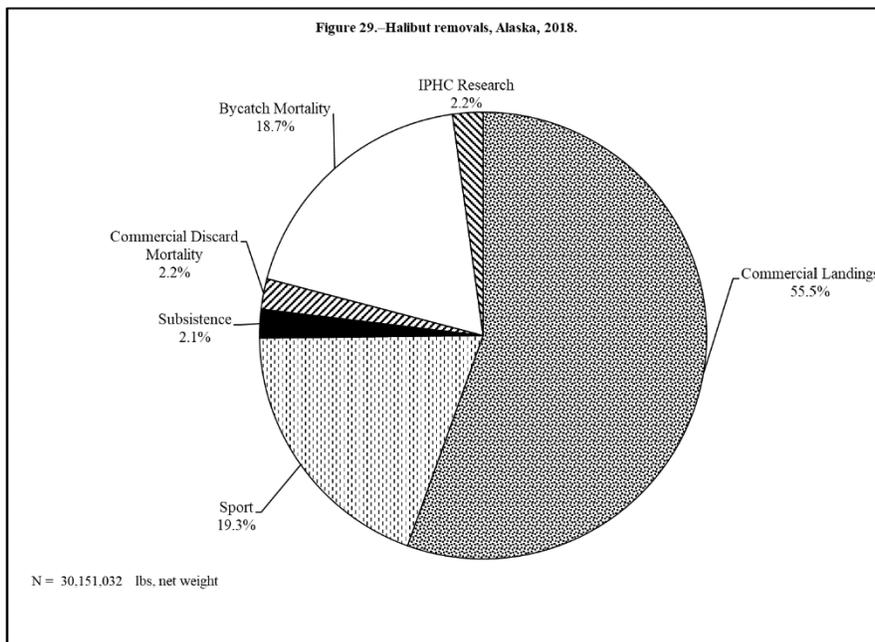
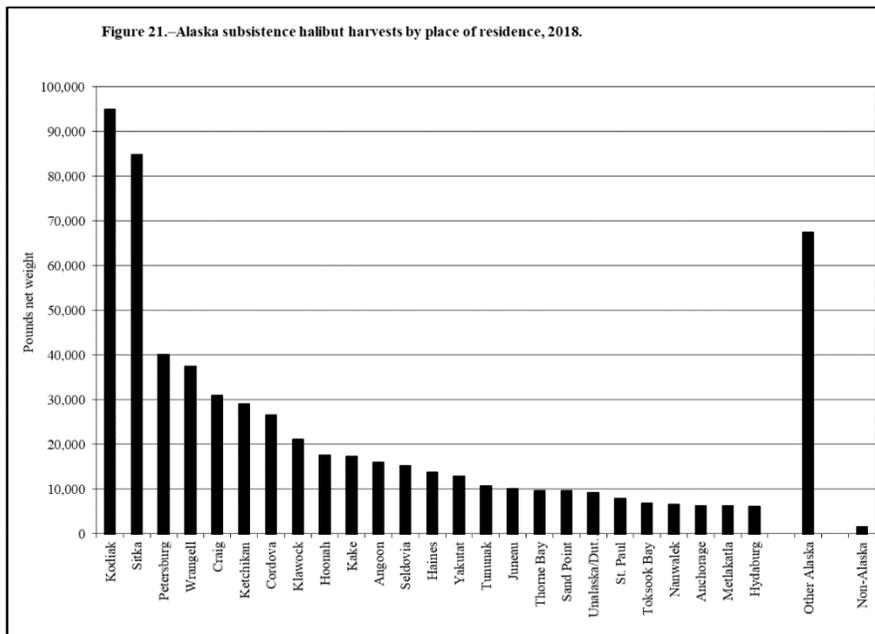
a. "Setline gear" = longline or stake; "hand-operated" gear = rod and reel or handline.

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



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APPENDIX IV

2019 and Final 2020 Halibut PSC Use by IPHC area and Gear type in the BSAI and GOA

Data through 01/04/21

Table 1: Total and Projected Halibut Mortality in the GOA and BSAI (nearest metric ton) by Area and Gear (Target)

| 2019 Total | | 2020 (Predicted 10/16) | 2020 Actual | Difference (Actual – Predicted) |
|-------------------------------|------------|---------------------------|-------------|------------------------------------|
| Area 2C | | | | |
| Hook-and-line (non-sablefish) | 2 | 3 | 3 | 0 |
| Hook-and-Line (sablefish) | 33 | 8 | 8 | 0 |
| Pot | 0 | 0 | 0 | 0 |
| Total | 35 | 11 | 11 | 0 |
| Area 3A | | | | |
| Trawl | 894 | 673 | 561 | -112 |
| Hook-and-line (non-sablefish) | 49 | 3 | 1 | -2 |
| Hook-and-Line (sablefish) | 32 | 9 | 8 | -1 |
| Pot | 0 | 0 | 0 | 0 |
| Total | 975 | 685 | 570 | -115 |
| Area 3B | | | | |
| Trawl | 197 | 245 | 223 | -22 |
| Hook-and-line (non-sablefish) | 9 | 4 | 0 | -4 |
| Hook-and-Line (sablefish) | 44 | 4 | 3 | -1 |
| Pot | 1 | 0 | 0 | 0 |
| Total | 251 | 253 | 226 | -27 |

| 2019 Total | 2020 (1/1 to 10/16) | Projected (10/16 to 12/31) | 2020 Total | |
|-------------------------------|--------------------------------|--|-------------------|------------|
| Area 4A | | | | |
| Trawl | 169 | 130 | 20 | 150 |
| Hook-and-line (non-sablefish) | 18 | 3 | 3 | 6 |
| Hook-and-Line (sablefish) | 4 | 0 | 0 | 0 |
| Pot | 2 | 2 | 0 | 2 |
| Total | 193 | 135 | 23 | 158 |
| Area 4B | | | | |
| Trawl | 83 | 38 | 14 | 52 |
| Hook-and-line (non-sablefish) | 7 | 3 | 3 | 6 |
| Hook-and-Line (sablefish) | 0 | 0 | 0 | 0 |
| Pot | 1 | 2 | 0 | 2 |
| Total | 91 | 43 | 17 | 60 |
| Area 4 CDE | | | | |
| Trawl | 1,087 | 599 | 85 | 684 |
| Hook-and-line (non-sablefish) | 54 | 57 | 9 | 66 |
| Hook-and-Line (sablefish) | 0 | 0 | 0 | 0 |
| Pot | 0 | 0 | 0 | 0 |
| Total | 1,141 | 656 | 94 | 750 |
| Area 4 Closed | | | | |
| Trawl | 934 | 661 | 45 | 706 |
| Hook-and-line (non-sablefish) | 17 | 3 | 2 | 5 |
| Hook-and-Line (sablefish) | 0 | 0 | 0 | 0 |
| Pot | 1 | 1 | 0 | 1 |
| Total | 952 | 665 | 47 | 712 |
| TOTAL (All Areas) | | | | |
| Trawl | 3,364 | 2,151 | 361 | 2,512 |

| | | | | |
|-------------------------------|--------------|--------------|------------|--------------|
| Hook-and-line (non-sablefish) | 157 | 69 | 23 | 92 |
| Hook-and-Line (sablefish) | 113 | 14 | 4 | 18 |
| Pot | 6 | 5 | 0 | 5 |
| Total | 3,639 | 2,240 | 388 | 2,627 |

Table 1 includes estimates of halibut mortality from groundfish fisheries managed by the State of Alaska, and halibut mortality from federally managed groundfish fisheries. Table 1 estimates the amount of halibut mortality by each gear type using a method of apportioning by IPHC area

Table 2. 2011 through 2020 BSAI and GOA Halibut PSC Use by Sector.

| Halibut Mortality (Data through 12/18/2020) | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
|---|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| BERING SEA AND ALEUTIAN ISLANDS | | | | | | | | | |
| Bering Sea and Aleutian Islands Trawl | | | | | | | | | |
| Non-Pelagic Trawl (Amendment 80 C/P) | 1,944 | 2,166 | 2,178 | 1,633 | 1,405 | 1,167 | 1,343 | 1,458 | 1,047 |
| Non-Pelagic Trawl (AFA C/P) | 117 | 127 | 204 | 71 | 78 | 57 | 105 | 39 | 34 |
| Non-Pelagic Trawl (Catcher Vessels) | 497 | 382 | 305 | 310 | 410 | 337 | 309 | 499 | 262 |
| Non-Pelagic Trawl (CDQ) | 203 | 194 | 185 | 100 | 140 | 129 | 137 | 168 | 90 |
| Pelagic Trawl (AFA C/P) | 180 | 166 | 79 | 74 | 64 | 57 | 32 | 66 | 56 |
| Pelagic Trawl (AFA catcher vessels) | 165 | 33 | 57 | 30 | 19 | 17 | 10 | 16 | 19 |
| Pelagic Trawl (CDQ) | 13 | 12 | 21 | 8 | 9 | 6 | 7 | 17 | 10 |
| Bering Sea and Aleutian Islands Hook-and-line and Pot gear | | | | | | | | | |
| Hook-and-Line | 556 | 463 | 402 | 293 | 196 | 172 | 120 | 79 | 68 |
| Hook-and-Line (CDQ Groundfish) | 58 | 58 | 37 | 22 | 25 | 18 | 11 | 4 | 8 |
| Hook-and-Line (IFQ/CDQ sablefish) | 8 | 6 | 3 | 2 | 1 | 0 | 0 | 0 | 0 |
| Pot Gear | 6 | 5 | 4 | 3 | 3 | 3 | 2 | 5 | 5 |
| Total BSAI | 3,747 | 3,611 | 3,476 | 2,546 | 2,350 | 1,963 | 2,075 | 2,351 | 1,599 |
| GULF OF ALASKA | | | | | | | | | |
| Gulf of Alaska Trawl | | | | | | | | | |
| Non-Pelagic Trawl (Central GOA C/Vs) | 1,198 | 741 | 828 | 961 | 965 | 750 | 900 | 741 | 587 |

| | | | | | | | | | |
|--|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Non-Pelagic Trawl (Western GOA C/Vs) | 111 | 93 | 70 | 47 | 107 | 18 | 32 | 18 | 0 |
| Pelagic Trawl | 5 | 20 | 1 | 13 | 12 | 14 | 39 | 15 | 32 |
| Trawl (C/P) | 388 | 377 | 502 | 375 | 246 | 433 | 217 | 328 | 171 |
| Gulf of Alaska Hook-and-line and Pot gear | | | | | | | | | |
| Hook & Line (C/P) | 53 | 35 | 76 | 68 | 77 | 69 | 10 | 20 | 0 |
| Hook & Line (Catcher vessels) | 147 | 130 | 117 | 153 | 165 | 105 | 42 | 55 | 2 |
| Hook & Line - IFQ sablefish | 37 | 31 | 29 | 34 | 29 | 40 | 75 | 111 | 21 |
| Pot Gear | 41 | 15 | 10 | 22 | 44 | 15 | 1 | 1 | 0 |
| TOTAL GOA | 1,980 | 1,441 | 1,634 | 1,674 | 1,645 | 1,443 | 1,317 | 1,289 | 813 |
| TOTAL All Areas | 5,727 | 5,052 | 5,110 | 4,220 | 3,995 | 3,406 | 3,392 | 3,640 | 2,412 |

Figure 1. 2019 and 2020 BSAI Trawl Halibut PSC Use by Groundfish Fishery.

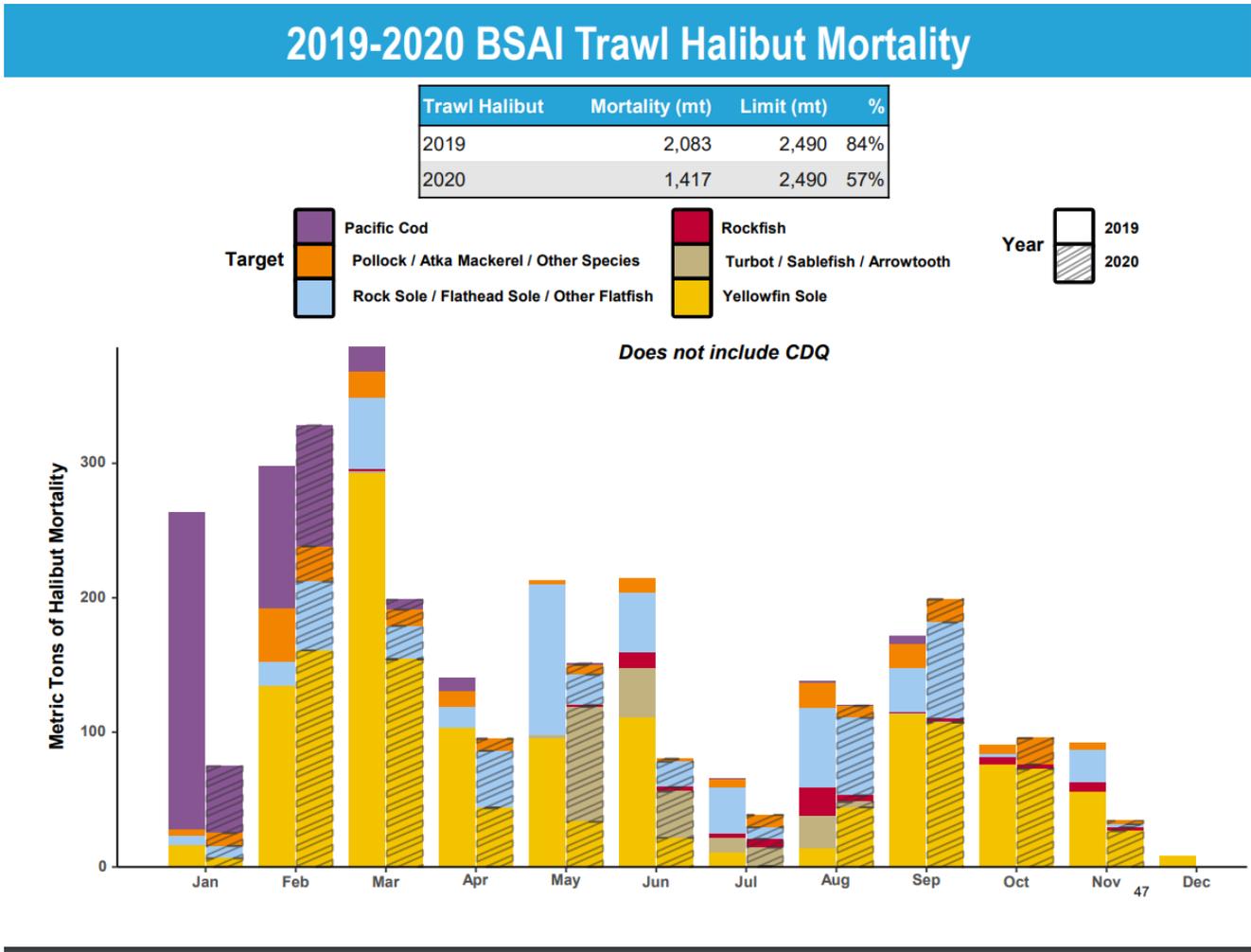


Table 3. 2020 GOA Sablefish IFQ Fishery by Gear Type

| 2020 Sablefish | Hook-and-Line | | | Pot | | |
|-----------------|----------------|----------------|--------------------|----------------|----------------|--------------------|
| | Unique Vessels | Sablefish (mt) | % of IFQ Sablefish | Unique Vessels | Sablefish (mt) | % of IFQ Sablefish |
| Southeast | 135 | 2,472 | 84% | 42 | 471 | 16% |
| West Yakutat | 59 | 1,081 | 68% | 35 | 516 | 32% |
| Central GOA | 70 | 1,205 | 32% | 71 | 2,563 | 68% |
| Western GOA | 18 | 172 | 14% | 26 | 1,085 | 86% |
| GOA Wide | 190 | 4,929 | 52% | 102 | 4,636 | 48% |

Figure 2. 2020 Sablefish and Other Species Incidental Catch in GOA Fixed Gear Sablefish Target=

2020 Sablefish and Incidental Catch in Fixed Gear Sablefish Targets

