



# North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director  
1007 W. 3rd Avenue, Suite 400, Anchorage, AK 99501  
Phone 907-271-2809 | [www.npfmc.org](http://www.npfmc.org)

May 18, 2020

Dr. David Wilson  
Executive Director  
International Pacific Halibut Commission  
Sent via email: [David.Wilson@iphc.int](mailto:David.Wilson@iphc.int)

Dear Dr. Wilson:

As you are aware, the North Pacific Fishery Management Council held a Special Meeting on May 15, 2020 to review emergency rule requests related to impacts of the COVID-19 pandemic. On behalf of the Council, I would like to thank the IPHC's Secretariat for providing valuable context and comments relative to some of these proposals.

During the May Special Council meeting the Council approved the following changes to the regulations for charter halibut management measures in Regulatory Areas 2C and 3A for the remainder of the 2020 fishing season. Inter-agency management does not provide a mechanism for in-season management for the charter halibut sector and it is understood that changing management measures mid-season should not be a typical occurrence. However, State of Alaska mandated travel restrictions, cruise ship cancellations, and widespread concern for public health has created unprecedented circumstances for this industry. Significant charter cancellations and a large reduction in angler interest is likely to result in lower than expected levels of charter fishing effort than analysis suggested in December of 2019. Relaxing management measures may provide some additional market opportunity for this struggling sector, while still resulting in removals under the allocation for each Regulatory Area as established in the Catch Sharing Plan. **In this unprecedented time, the Council requests that the IPHC call an intersessional meeting to consider amending these measures as follows.**

The Council recommends the following management measures for IPHC Regulatory Area 2C:

- In Area 2C, maintain the one halibut daily bag limit and implement a reverse slot limit with an upper limit of 80 inches and a lower limit of 45 inches (U45O80) for charter anglers for the remainder of the 2020 season.

The Council recommends the following amended management measures for IPHC regulatory Area 3A:

- In Area 3A, maintain a daily bag limit of 2 halibut, one of any size and a second fish equal to or less than 32 inches; no annual limit and no daily closures. Maintain the limit of 1 trip per halibut charter vessel per day and 1 trip per charter halibut permit per day. These management measures would be in place for the remainder of the 2020 season.

These recommendations are intended to keep the charter halibut sectors in Areas 2C and 3A within their allocations as prescribed in the Catch Sharing Plan while responding to the likely drop in angler effort due to the pandemic's devastating impact to the tourism economy. These measures were chosen based on the Alaska Department of Fish and Game's analysis demonstrating different levels of reduced effort necessary to keep the charter sector under their catch limits for 2020.<sup>1</sup>

---

<sup>1</sup> <https://meetings.npfmc.org/CommentReview/DownloadFile?p=c22d7df7-44f1-4a04-9f84-bb3d74a876d6.pdf&fileName=B2%20PRESENTATION%20-%20ADFG.pdf>

For Area 2C, a reverse slot limit with an upper limit of 80 inches and a lower limit of 45 inches is expected to be a conservative approach to relaxing charter management measures. Table 4 on Page 7 of the analysis demonstrates that under the proposed reverse slot limit (including an upper limit of 80 inches and a lower limit of 45 inches) the Area 2C charter halibut fishery is expected to result in 888,260 lb of estimated removals. Thus, if the decrease in effort results in at least 12.2% decrease in total removals this regulatory area would still be under its allocation under the Catch Sharing Plan. Given the vast majority of the 2C charter anglers are non-Alaskan residents, many of whom arrive in Alaska via cruise ship, it is expected that cancellation of cruise ships, travel restrictions and general aversion to travel will significantly reduce fishing effort in this area, likely beyond this magnitude.

Removals from Area 3A are more difficult for analysts to forecast for 2020. The charter sector's proposed changes to regulations in Area 3A are substantially different from recent years and therefore there is a considerable amount of uncertainty in these forecasts. The Council's recommended changes address the need to decrease the uncertainty and increase the likelihood of remaining within the Area 3A allocation, while also accounting for the expectation of reduced charter fishing effort. Thus, rather than recommending 2-fish of any size bag limit, which is estimated to require anywhere from a 26.3% reduction in projected removals to a 62.3% reduction in projected removals based on the uncertainty in both harvest-per-angler-day and average weight of the second fish (see Table 10, page 12 of the analysis), the Council is recommending a size restriction on the second fish of 32 inches or less. As can be seen in the Addendum to ADF&G's analysis,<sup>2</sup> if the total removals are 37.6% lower than the projection for Area 3A this would result in Area 3A remaining under its allocation under the Catch Sharing Plan. These estimates also include removal of annual limits, no day of the week closures, and a one-trip per day limit for charter vessels and for charter halibut permits which are also part of the Council's recommendation for Area 3A. The ADF&G indicated that this is likely a conservative estimate (meaning it is probably an *under* estimate of reductions in angler effort) because the analysis assumes that recent closure days have eliminated effort that historically occurred on those days when in fact some of that effort could have been displaced to open days of the week.

**The Council is very concerned about the impacts of COVID-19 related travel and health restrictions on the Charter fleet and requests that the International Pacific Halibut Commission expedite the promulgation of this change as expeditiously as possible.**

The charter representatives' second request was for a rollover of unused charter allocation from 2020 to 2021 in Regulatory Areas 2C and 3A. The Council is not recommending a rollover of unused 2020 charter allocation at this time. This issue may be reconsidered depending on the extent of charter allocation that remains unfished in 2020. However, the IPHC Secretariat's comments made clear that this is an allocative issue by nature as projected harvests that are not completely taken in 2020 will be factored into the stock assessment and population dynamics in the subsequent year.

Thank you for your consideration of these requests.

Sincerely,



David Witherell  
Executive Director, NPFMC

---

<sup>2</sup> <https://meetings.npfmc.org/CommentReview/DownloadFile?p=f138f169-8231-4541-9757-aa6bce07a28f.pdf&fileName=B2%20Charter%20Halibut%20Management%20Measures%20Addendum.pdf>