

Alternatives Considered in Public Review Draft of Revised Pacific Halibut Catch Sharing Plan in Area 2C and Area 3A¹

August 2012

The April 2012 Council motion (see page 2), as corrected in June 2012, results in five options for the Council to allocate Pacific halibut between the commercial IFQ sector and charter sector based on a Combined Catch Limit (CCL) that would be set each year by the International Pacific Halibut Commission (IPHC) in Area 2C (Table 1) and Area 3A (Table 2). The tables show both the status quo alternative (the Guideline Harvest Level (GHL) Program) and four proposed alternative allocations.

The Council adopted a Preliminary Preferred Alternative (PPA) in April 2012, which includes two adjustments to the 2008 Preferred Alternative:

- 1) eliminating the \pm 3.5% target range around the allocations and
- 2) converting from the statewide harvest survey to logbooks with adjustments for crew harvests.

The Council also included an option to increase the allocation to the charter sector by 3.5% of CCL at the two lower CCL levels; no adjustment is made to the highest CCL. The Council labeled those as Option 1 (Area 2C) and Option 2 (Area 3A). They represent the *2008 Preferred Alternative plus 3.5% of the CCL*.

The analysis also includes an option labeled Option 1 adjusted (Area 2C) and Option 2 adjusted (Area 3A) that increases the *2012 PPA by the same 3.5% of the CCL* at lower CCL levels. These options apply a consistent approach to the 2012 PPA that was applied to the 2008 Preferred Alternative. Their addition applies a consistent, logical approach to identifying the full range of allocation options and notices the public of potential action by the Council when it selects its Final Preferred Alternative in October 2012.

In the tables below, note that the GHL allocations are based on the Total CEY and the CSP allocations are based on the CCL.

Table 1. Area 2C charter allocations defined in the Council motion

If Total CEY is greater than (Milb)	GHL in Milb (Status Quo)	Combined Catch Limit (CCL)	2008 Preferred Alt.	2012 PPA (2008 PPA adjusted for allocation and logbooks)	Option 1 (2008 Pref Alt + 3.5% of CCL)	Option 1 adjusted (2012 PPA + 3.5% of CCL)*
4.779	0.788	< 5 Milb	17.3%	18.3%	20.8%	21.8%
5.841	0.931	\geq 5 Milb - 9 Milb	15.1%	15.9%	18.6%	19.4%
6.903	1.074	\geq 9 Milb	15.1%	15.9%	15.1%	15.9%
7.965	1.217					
9.027	1.432					

* Option 1 adjustments only apply when the CCL is less than 9 Milb.

Table 2. Area 3A charter allocations defined in the Council motion

If Total CEY is greater than (Milb)	GHL in Milb (Status Quo)	Combined Catch Limit (CCL)	2008 Preferred Alt.	2012 PPA (2008 PPA adjusted for allocation and logbooks)	Option 2 (2008 Pref Alt + 3.5%)	Option 2 adjusted (2012 PPA + 3.5% of CCL)*
11.425	2.008	< 10 Milb	15.4%	17.2%	18.9%	20.7%
13.964	2.373	\geq 10 Milb - 20 Milb	14.0%	15.6%	17.5%	19.1%
16.504	2.734	\geq 20 Milb	14.0%	15.6%	14.0%	15.6%
19.042	3.103					
21.581	3.650					

* Option 2 adjustments only apply when the CCL is less than 20 Milb

¹ To be released in early September 2012

The Council's April 2012 motion, as corrected in June 2012, is presented below:

The Council moves to amend its previous action on the charter halibut catch sharing plan (CSP). The following changes would be incorporated into a new preliminary preferred alternative:

The Council adopts the March 27, 2012, recommendations of the Halibut Charter Management Implementation Committee and the Advisory Panel to adopt the "2012 Model" for determining annual charter halibut management measures under the CSP and removing the current matrix of management measures that are included in the current proposed rule. With this change, the Council also removes the target range around the allocations of +/- 3.5%.

The Council also adopts the unanimous recommendation of the Halibut Charter Management Implementation Committee and the Advisory Panel to use ADF&G logbooks as the primary data collection method. The Council recommends using an adjustment factor based on the five-year average (2006 – 2010) of the difference between the harvest estimates provided by the logbooks and the SWHS, with the adjustment factor reduced by the amount of harvest attributed to skipper and crew. The Council's understanding is that applying this adjustment factor would result in the following changes to the CSP allocations:

Area 2C adjustment factor = 5.6%

Area 2C current CSP allocation in Tier 1 = 17.3%

*Adjusted CSP allocation = (17.3% * 5.6%) + 17.3% = 18.3%*

Area 2C current CSP allocation in Tiers 2 through 4 = 15.1%

*Adjusted CSP allocation = (15.1% * 5.6%) + 15.1% = 15.9%*

Area 3A adjustment factor = 11.6%

Area 3A current CSP allocation in Tier 1 = 15.4%

*Adjusted CSP allocation = (15.4% * 11.6%) + 15.4% = 17.2%*

Area 3A current CSP allocation in Tiers 2 through 4 = 14.0%

*Adjusted CSP allocation = (14.0% * 11.6%) + 14.0% = 15.6%*

[Note: The analysis will address who would be responsible for marking the GAF and reporting the GAF lengths]

The Council recommends for consideration of a letter to the IPHC supporting the idea of separate BAWM accountability between halibut sectors, and revising the preamble to the rule describing the method that the Council would expect to be used by the IPHC in setting catch limits.

[Note: The analysis will address the proposed separate accountability for commercial wastage and charter wastage.]

The Council recommends revisions to the GAF program as follows:

- This revision would issue GAF in numbers of fish. Conversion of IFQ pounds to numbers of fish would be based on the average weight of GAF from the previous year.*
- In the first year of the GAF program, the GAF weight to number of fish conversion factor is based on the previous year's data or most recent year without maximum size limit in effect.*
- Define the leasing limitation from one IFQ share holder from 10% or 1500 pounds whichever is greater, to 10% of IFQ holdings or 1500 pounds in 2C, and to 15% or 1500 pounds 3A, whichever is greater.*
- Include a requirement for anglers to mark GAF by removing the tips of the upper and lower lobes of the tail and report the length of retained GAF halibut to NMFS through the NMFS approved electronic reporting system.*

- *A complete review within five years of the start of the GAF program, taking into account the economic effects of both sectors.*

The Council requests that the analysis be revised to incorporate the changes to the preliminary preferred alternative described above, and include analysis of the following options for consideration to revise the charter allocations at lower levels of abundance:

Option 1: Area 2C

At a combined catch limit of <5 mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (20.8%); at a combined catch limit of ≥ 5 - <9 mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (18.6%). At combined catch limits of ≥ 9 mlbs, maintain the original target CSP allocation of 15.1%.

Option 2: Area 3A

At a combined catch limit of <10 mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (18.9%); at a combined catch limit of ≥ 10 - <20 mlbs, establish the CSP allocation at the upper end of the original range proposed for the CSP (17.5%). At combined catch limits of ≥ 20 mlbs, maintain the original target CSP allocation of 14.0%.

Note: Under the 2012 model, the +/- 3.5% range around the allocation would be removed, and the Council would be annually recommending management measures that minimize the difference between the projected harvest and the target allocation, without exceeding the allocation.

With the above additions and revisions, the intent of the Council is to review the CSP analysis as a whole and take final action in the near future.