

## **Non-Private Solutions Summary**

October 22, 2007

### **Problem Statement:**

Halibut is a fully utilized resource whose harvest must be actively managed to preserve long term sustainability. The recreational/charter harvest is not currently controlled beyond a daily limit. As recreational/charter catches increase, the commercial share of the catch is reduced in an effort to keep the overall catch within sustainable levels. This results in economic uncertainty in the commercial sector while leaving open the possibility of over-harvesting due to uncontrolled harvest by the recreational/charter sector.

A successful long term solution to these problems should:

- Allow for recreational/charter allocation growth while compensating the commercial sector for its corresponding allocation decrease.
- Fairly manage the recreational/charter harvest within its allocation.
- Account for the recreational/charter harvest in a timely and accurate manner.

### **Allocation Growth:**

Holding entities are created for IPHC regulatory areas 2C and 3A to purchase and hold QS or IFQ on behalf of the recreational/charter sector and to further other programs that promote conservation of the resource. QS could be purchased to allow permanent growth of the sector allocation. In-season IFQ purchase would allow the recreational/charter sector to catch more than its allocation in a managed and compensated manner. At the end of the season, any unfished allocation could be leased back to the commercial sector for an end of season cleanup. These entities are discussed at length in NPFMC staff analyses on compensated allocation. A regional non-profit association, funded by bonds that are repaid by self tax, grants, bequests, donations, etc., appears to be the most flexible and easily implemented of the options under analysis.

### **Harvest Management:**

Option 1: Harvest Tickets:

Each January, the recreational/charter allocation (in fish) is determined using harvest data from the previous year and the fishery allocation policy. This allocation is divided into a finite number of harvest tickets, each good for a limit of fish for one person on a day of the person's choice. Harvest tickets are made available to the recreational anglers on a first come, first served basis via the internet or retail vendors, and are non-transferable. 30 to 50% of the anticipated allocation could be issued before the yearly allocation is set, accommodating operations that book a year in advance. Tickets are directly linked to a fishing license. Harvest ticket distribution stops when all available tickets have been dispensed, essentially pre-reserving the allocation. Harvest Ticket distribution could restart if fish become available through in-season IFQ purchase. Additional tickets could be generated if unused tickets have an expiration date and if

harvest reports indicate catches of less than a full limit. With an average success rate of 1.6 to 1.8 fish per client, for every 5 to 10 tickets used, a new ticket could be released. Tickets could be issued by the month, with monthly allocations proportional to past usage trends, allowing traditional length of season even with a constrained allocation.

#### Option 2: Emergency Order Season Closure:

Each year, the recreational/charter allocation in fish is determined using harvest data from the previous year and the fishery allocation policy. ADF&G or NMFS monitors the charter harvest by compiling data from charter logbooks on a weekly basis. When it appears that the allocation is about to be met, ADF&G/NMFS notifies the holding entity, which if possible, commences purchase of IFQ (a one time lease of QS) to dynamically extend the season. If no IFQ are available or no money is available to purchase IFQ, the holding entity notifies the responsible authority, which then issues an EO closing recreational/charter harvest of halibut.

#### **Accountability:**

A uniquely numbered, individual daily harvest record should be incorporated into either management option. At a minimum it should include date of trip, charter identification and number of fish caught. It could include fish lengths. The harvest record would serve as proof of legal capture until the fish is processed. Individual harvest records would be deposited in drop boxes or mailed in for database entry. Individual harvest records would serve to validate logbook data, since there would be a one to one relationship between logbook entries and individual harvest records. In the private recreational fishery, an individual daily harvest record could also be filled out and reported, providing SOA/NMFS with a timely and more accurate estimate of the private harvest.

Charter logbooks currently track the number of halibut caught by charter clients and the data is reported weekly. In a charter only solution, assuming this year's harvest information could be available in-season for management purposes, it should be sufficient for the decision making required by the EO management option.

#### **Comments:**

- This proposal provides for a permanent, compensated allocation shift via QS purchase. The allocation growth entity allows for dynamic in-season growth of the recreational/charter allocation via IFQ purchase, as well as end of season mop up of unfished recreational/charter allocation by the longline sector.
- The Harvest Ticket option manages the recreational/charter harvest within its allocation, with *no in-season rule making required* since its single operating premise is that ticket distribution stops when the allocation is fully pre-reserved.
- This proposal does not privatize a public trust resource.

- This proposal does not increase the cost of entry to charter operators.
- This proposal works with any size allocation and any allocation type.
- This proposal works with or without a moratorium.
- This proposal does not depend on logbook data for an implementation starting point.
- Incorporating a daily harvest record into either management option provides a method to better validate the charter harvest. (Charter operators will know that a very large portion of their logbook data will be verified by independently submitted harvest records.)
- Assuming adequate funding and available IFQ/QS for transfer to the recreational/charter sector, the need for either management tool (EO season closure or ticket distribution cessation) is minimized.
- The EO management proposal is drastic but simple, depending only on timely harvest data collection.
- The Harvest Ticket option fairly distributes a limited resource to recreational/charter anglers in a way we all understand, since virtually all goods and services are distributed on a first come, first served basis.
- The Harvest Ticket option allows the halibut season to continue when ticket distribution ceases, since holders of unused tickets can fish them any time they choose within the open season.
- This proposal could work with either the charter sector or the entire recreational sector. A proposal that applies equally to the entire recreational sector minimizes enforcement costs and eliminates “leakage” associated with charter-only solutions, while equitably distributing the resource among all recreational fishermen.
- This harvest ticket option does not favor large, well capitalized operators over small operators, since it is entirely client driven.

Questions, comments and suggestions are welcome!

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