

D1 Charter Halibut Permit Use and Angler Effort Discussion Paper

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1 Introduction

At the December 2025 North Pacific Fishery Management Council (Council) meeting the Council tasked staff to prepare a discussion paper on Charter Halibut Permit (CHP) use, charter halibut effort and harvest measures.² The discussion paper is intended to provide useful context in considering recent trends in the charter halibut fisheries which may be informative to the annual management measure process, in considering the performance of the Charter Halibut Limited Access Program (CHLAP), and in considering the ability of the Recreational Quota Entity (RQE) to relax future management measures for charter anglers. It was emphasized by Council members that this discussion paper is not intended to be a full program review of the CHLAP, but to provide the requested information as possible for the Council, its advisory bodies, and public to consider any next steps.

The discussion paper was directed to include available data for each permit type, transferable, non-transferable, Community Quota Entity (CQE), and Military permits, and for International Pacific Halibut Commission (IPHC) Regulatory Area 2C and 3A, respectively. The Council highlighted seven specific requests, which have been renumbered as follows:

1. Annual renewal and retirement of CHPs
2. Ownership transfer and lease transfer of CHPs
3. Transferable CHP use and non-transferable CHP use (trip counts, angler days)
4. Use of CQE CHP issued to non-active CQE entities
5. A description of the extent to which businesses which are at the CHP holding cap (5) are also using additional CHPs through lease transfer

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² Council motion, December 2025: <https://meetings.npfmc.org/CommentReview/DownloadFile?p=3730b69f-ce21-47f4-af6c-96f365c8cef7.pdf&fileName=MOTION%20E%20CHLAP%20REVIEW.pdf>

For definition of acronyms and abbreviations, see online list: <https://www.npfmc.org/library/acronyms>

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6. Holding constant the most recent Fishery Constant Exploitation Yield (FCEY), average weight, and harvest per unit effort (HPUE), project the maximum effort level allowing for the following harvest measures:
 - 2C
 - U45080 reverse slot with no additional harvest measures
 - One fish of any size with no additional harvest measures
 - Two fish of any size with no additional harvest measures
 - 3A
 - One fish of any size and a second fish of 28" or less, closed Wednesdays, and a one-trip daily limit
 - One fish of any size and a second fish of 32" or less, with no additional harvest measures
 - Two fish of any size with no additional harvest measures
7. Holding constant the most recent FCEY, average weight, HPUE, and angler effort, project the maximum harvest measures available assuming full RQE pools:
 - For 2C use a reverse slot table
 - For 3A, in order, increase size of the second fish up to 32", open up days of the week

The remainder of the paper provides relevant background context and then walks through each analytical request. Data requests #6 and 7 rely on the Analysis of Management Options for the Area 2C and 3A Charter Halibut Fishery for 2026 (ADF&G 2025) which is attached as Appendix 1.

2 Background

2.1 Charter Halibut Limited Access Program

On January 5, 2010, NMFS published a final rule to create a limited access system for charter vessels in the guided sport fishery for Pacific halibut in waters of IPHC Regulatory Areas 2C (Southeast Alaska) and 3A (Central Gulf of Alaska; 75 FR 554; January 5, 2010). The CHLAP limits the number of charter vessels that may participate in the guided sport fishery for halibut in these areas. The intended effect of the CHLAP was to curtail growth of fishing capacity in the guided sport fishery for halibut.

Since February 1, 2011, all vessel operators in Areas 2C and 3A with charter anglers onboard have been required to have an original, valid permit onboard during every charter vessel fishing trip on which Pacific halibut are caught and retained. NMFS issued CHPs to licensed charter fishing business owners based on their past participation (number of eligible trips and number of vessels used during the qualifying period) in the charter halibut fishery. CHPs are transferable or non-transferable, depending on the fishery participation of the initial recipient. CHPs are endorsed for a single regulatory area (2C or 3A) and, with limited exceptions, the number of charter vessel anglers that may catch and retain halibut on a charter vessel fishing trip. All CHP holders are subject to limits on the number of permits they may hold (typically 5 CHPs) to prevent over-consolidation.

NMFS also provides a limited number of permits issuable on request to nonprofit corporations representing specified rural communities (community quota entities or "CQE") and for the U.S. Military's Morale, Welfare and Recreation (MWR) programs for service members. All CQE community CHPs and MWR CHPs are non-transferable.

Table 1 shows the number of each type of permit for Area 2C and Area 3A in 2026. This table also separates the number of CHPs that are transferable and non-transferable CHPs. In total, there are 1,066 charter permits across both areas. In Area 2C, 65% of the total permits are transferable and in Area 3A 70% of the CHPs are transferable.

Table 1 Number of CHPs, MWRs and CQE charter permits by regulatory area, 2026

Permit type	2C	% of 2C total	3A	% of 3A total
CHPs	529	91.5%	426	87.3%
<i>Non-transferable CHPs</i>	155	26.8%	85	17.4%
<i>Transferable CHPs</i>	374	64.7%	341	69.9%
CQE Community CHPs	48	8.3%	56	11.5%
MWR CHPs	1	0.2%	6	1.2%
Area Total	578	100.0%	488	100.0%

Source: NMFS RAM Division; <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#charter-sport-halibut>, July 13, 2026.

Note: CQE= Community Quota Entity, MWR = U.S. Military Morale, Welfare, and Recreation.

Not all CHPs allow for equal angler effort. CHPs are endorsed with a maximum number of charter vessel anglers that may catch and retain halibut on a charter vessel fishing trip. Table 2 demonstrates angler endorsements for CHPs broken out by transferability status. In both areas, a 6-angler endorsement is the most common type of permit. In Area 2C only 2% of the CHPs can accommodate greater than 6 anglers; however, in Area 3A, about 25% of the CHPs can accommodate greater than 6 anglers. In Area 2C most of the non-transferable permits are endorsed for 4 anglers. All CQE charter permits are endorsed for 6 anglers, and MWR permits do not have a specific angler endorsement.

Table 2 Angler endorsements by transferability status, 2026

Angler endorsements	Area 2C		Area 3A	
	Non-transferable CHPs	Transferable CHPs	Non-transferable CHPs	Transferable CHPs
4	85	90	20	19
5	25	112	15	27
6	43	162	38	211
7		5	2	21
8		4	1	8
9	1		1	2
10		1	3	2
11			1	2
12				6
13	1			4
14				2
15			2	2
16				10
17			1	4
18			1	4
19				2
20				2
21				2
22				2
23				2
24				1
25				3
28				1
33				1
38				1

Source: NMFS RAM Division; <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#charter-sport-halibut>, July 13, 2026.

Note: Excludes CQE and MWR permits. CQE permits are endorsed for 6 anglers and MWR permits do not have a specified angler count.

Leasing of Permits

CHP leasing is very flexible from a regulatory standpoint. A charter vessel guide must have an original valid CHP aboard. In order for a lease to occur, there is no transfer or other notification to NMFS for a non-owner to use a CHP. While many CHP lease arrangements include complex private business agreements frequently conducted through a broker, it can also be as simple as one person handing a CHP to another person for the day.

The Council has an extended history around consideration restrictions on leasing of CHPs; however, leasing remains an authorized feature of the CHP program under current regulations. There are several analyses and discussion papers that provide context on this topic (e.g., NMFS 2016; NMFS 2018b; NPFMC 2010).

To summarize, when the Council recommended the charter halibut moratorium and designation of CHPs in 2007, it recommended that leasing of CHP would not be allowed.³ However, NMFS did not have a way to implement a broad restriction on leasing without a clear definition of what constituted a lease. CHPs were issued to licensed charter fishing business owners based on their past participation and there is operational diversity in the charter sector as to whether that business owner(s), CHP holder, and guide onboard the vessel are the same person. Thus, a prohibition on leasing was not implemented at that time, and NMFS notified the Council of the discrepancy.

In response there have been a number of discussion papers and analyses which evaluated alternatives and options to limit the leasing of CHPs, including the CHP registration action (NMFS 2018b). In the CHP registration action, the Council considered but did not recommend alternatives to require listing natural persons that would use the CHP, and/ or where the CHP would be used in the annual registration, with sub-options to invalidate the CHP in the following year if it was used by a person and/ or in a location not listed in the annual registration. Previous analyses and discussion papers that analyzed restrictions have not resulted in regulatory restrictions on leasing.

The concern around leasing has been driven by several articulated concerns, including the creation of absentee ownership, CHP market impacts, inhibitions to entry-level opportunity, and the risk of latent capacity becoming active through leasing, resulting in more restrictive management measures. One limitation to further action that has been highlighted, is based around concern for unintended adverse impacts to certain types of businesses that may not lease CHPs, but whose operational structure may be based on non-CHP holder use of CHPs. There is currently no link in the CHP ownership database or eLogbook information that would allow an enforcement agent to know the relationship between the CHP holder and the CHP user, unless it was the same individual with the same name listed on both. Given the original issuance of CHPs to businesses, individuals and groups of individuals, there are concerns that there could be unintended consequences to businesses, CHP holders and fishing guides based on how a prohibition on leasing is defined, monitored, and enforced.

2.2 Recreational Quota Entity Program

In December 2016, the Council took final action to recommend a regulatory program that authorizes a charter halibut recreational quota entity (RQE) to purchase and hold commercial halibut quota share (QS) on behalf of the charter halibut anglers in regulatory Areas 2C and 3A. The RQE provides a mechanism for compensated reallocation of a portion of commercial halibut quota share to the charter halibut fishery. This final rule became effective October 22, 2018 (83 FR 47819, September 21, 2018). This program is

³ The March 2007 Council motion recommending the charter halibut moratorium: <http://www.npfmc.org/wp-content/PDFdocuments/halibut/CharterHalibutMotion307.pdf>

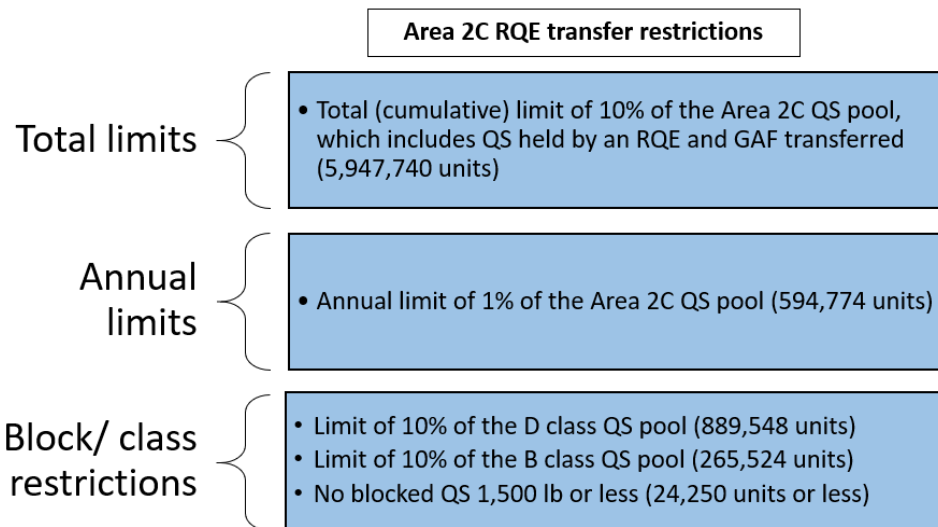
summarized below, but further details can be found in the final analysis (NMFS 2018a) and the proposed rule (82 FR 46016, October 03, 2017).

Under this program, halibut quota share purchased and held by a RQE may augment the apportioned pounds of halibut for the charter catch limit for that Area in that year, which can be used to relax the annual charter management measures (e.g., bag limits and size restrictions) up to the allowance for the unguided recreational sector (currently a daily bag limit of two halibut of any size). Halibut QS held by the RQE will generate annual pounds of recreational fishing quota (RFQ); a type of annual harvest privilege similar to IFQ that has special requirements that pertain only to the RQE. RFQ will be calculated in the same manner as IFQ. The specific amount of RFQ (in net pounds) will be determined by the number of QS units held by the RQE as of October 1 of the preceding calendar year, the total number of halibut QS units issued in Area 2C or 3A as of January 15 of the year the IFQ or RFQ is issued, and the total amount of halibut allocated to the commercial IFQ fisheries in Areas 2C and 3A for that year.

Transfer Restrictions for the RQE

Under the RQE Program, two-way transfers of QS are permitted. QS acquired by the RQE may be transferred to an otherwise eligible participant in the commercial IFQ fishery. NMFS will track QS units, IFQ pounds, and vessel class and block designations that apply to ensure that original categories and designations for the commercial IFQ fishery are maintained during the transfer process, even though they do not apply to the RFQ.

The Council included a number of types of transfer restrictions on an RQE's acquisition of QS including: restrictions on the type of quota share that can be purchased (i.e., QS class and block status) that differ by Area, annual limits on transfer, total (cumulative) limits on how much QS can be held. There is also a cumulative limit on the amount of RFQ and Guided Angler Fish (GAF)⁴ that could be transferred in a year. These limits are depicted in Figure 1. Further details and rationale for the restrictions established are in the final analysis (NMFS 2018a) and in the proposed rule (82 FR 46016, October 03, 2017).



⁴ GAF, as described more in Section 3.7.3, allows commercial IFQ to be leased and converted into additional opportunity for a charter halibut angler. A GAF provides a charter halibut angler the opportunity to catch 1 (additional) fish of any size (up to two fish), keep a larger fish, or retain halibut on days when regular halibut charter fishing is closed.

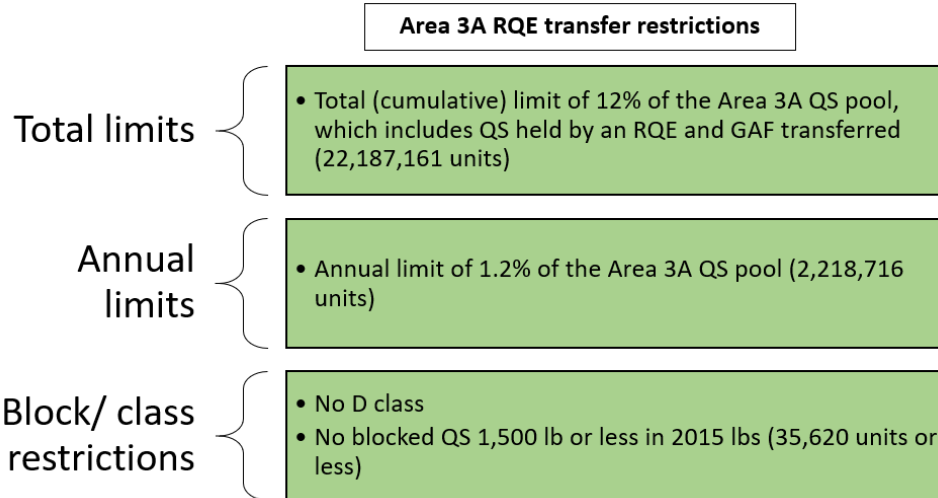


Figure 1 RQE transfer restrictions for Area 2C and 3A

RQE Funding Mechanism

During the development of the RQE Program, the Council did not recommend a specific means to fund the RQE's purchase of commercial halibut QS or to pay for other RQE expenses because NMFS did not have the statutory authority to develop such rules. From 2019 through 2022, Congress considered legislation that would grant NMFS authority to establish such a program. As Congress developed this legislation, the Council simultaneously began the analytical process to examine the administrative requirements necessary to implement an RQE Program fee collection. The Council, in April 2022, recommended to the Secretary a stamp program to fund the RQE as its preferred alternative. In December 2022, through the Consolidated Appropriations Act of 2023 (Pub. L. 117-328), the U.S. Congress enacted the Driftnet Modernization and Bycatch Reduction Act (Act). Public Law 117-328, 136 Stat. 4459, 5260-61 (Dec. 29, 2022). Section 106 of the Act authorized the Council to recommend, and the Secretary of Commerce to approve, "regulations necessary for the collection of fees from charter vessel operators who guide recreational anglers who retain Pacific halibut in IPHC regulatory areas 2C and 3A." Under Section 106 of the Act, any fees collected shall be available for financing administrative costs of the RQE Program; the purchase of halibut QS in Areas 2C and 3A by the RQE; halibut conservation and research; and promotion of the halibut resource by the RQE.

In response, NMFS published a final rule implementing the Council's recommended fee collection for the RQE Program (90 FR 29774, July 7, 2025) beginning in 2026. A charter halibut stamp (stamp) is required for every charter vessel angler, 18 years of age or older, for each charter vessel fishing trip in a given calendar day, or each calendar day during a charter vessel fishing trip that spans multiple days, who intends to catch and retain halibut on a charter vessel in IPHC regulatory Areas 2C and 3A. CHP holders purchase electronic stamps from NMFS in their eFISH accounts, an online portal profile provided by the NMFS for fishermen, registered buyers, and permit holders to manage federal fisheries permits and quotas electronically. Each stamp is \$20. Charter vessel guides validate (use) a stamp for each adult charter vessel angler intending to catch and retain halibut on a charter vessel fishing trip in their ADF&G Saltwater Charter Logbook. This data is reported to NMFS, which then deducts a corresponding number of stamps from the CHP holder's eFISH account. NMFS will grant collected stamp fees to the RQE for the authorized purposes noted above. This requirement is applicable to CHPs, community CHPs, and military CHPs.

This stamp requirement will generate significant revenue to support the RQE Program and is intended to provide additional harvest opportunities to the charter halibut fishery, particularly during periods of low

halibut abundance through a market-based transfer of halibut QS from the commercial sector to the charter halibut sector. The stamp requirement also creates new responsibilities for CHP holders, and a strong financial incentive to carefully monitor use of their CHPs and make sure logbook entries are accurate.

CHP holders are liable for purchasing all stamps used by the CHPs that they hold and must do so by December 31 each year. If there is an uncorrected stamp deficit, NMFS would disapprove the annual registration application for all CHPs in the holders account until the outstanding stamps are purchased (50 CFR 679.46(a)(1)(vi)(C)). For community CHPs and military CHPs, NMFS would invalidate the permits until outstanding validated charter halibut stamps associated with that permit are purchased (50 CFR 679.46(a)(1)(vi)(D)).

The RQE received its first transfer of Area 2C halibut QS in 2026. This included 25,974 units of C Class Area 2C QS, equivalent to ~1,300 lb in 2026. As this transfer occurred prior to the October 1 deadline, NMFS expects to issue RFQ in 2027 which will supplement the Area 2C charter halibut allocation.

3 Requested Information

The following subsections provide information related to each requested topic from the Council.

3.1 Request #1 Renewal and Retirement of CHPs

Beginning in the 2020 fishing season, CHPs were required to be registered (*i.e.*, renewed) annually through NMFS (84 FR 52800; Oct 3, 2019). Annual registration was part of an amendment package recommended by the Council to improve tracking of non-transferable CHPs, improve the enforcement of CHP ownership caps, and provide information to NMFS and the Council about changes in CHP ownership, participation and leasing (NMFS 2018b). There is no fee to register a CHP. Failure to register a permit does not automatically revoke or retire a permit, it is simply not valid for that season until registered.

Table 3 below provides counts and proportions of transferable and non-transferable CHPs that have been registered or not each season. CQE community CHPs and MWR permits are not required to be registered and therefore are not included in Table 2. Each year since the registration requirement began there have been between 64 -103 CHPs that have not been registered across both areas. For both areas, a larger proportion of the non-transferable CHPs are not registered each year (*i.e.*, an average of 21% in Area 2C and 28% in Area 3A), compared to the proportion of transferable CHPs that are not registered (*i.e.*, an average of 2% in Area 2C and 4%) in Area 3A. There are 34 CHPs that are not retired but have never been registered.

Table 3 Charter Halibut Permit registration, 2020-2026

2C						
Year	# non-transferable	% non-transferable	# transferable	% transferable	# 2C Total	% 2C total
Registered CHPs						
2020	120	77%	365	98%	485	92%
2021	120	77%	363	97%	483	91%
2022	124	80%	371	99%	495	94%
2023	127	82%	371	99%	498	94%
2024	127	82%	370	99%	497	94%
2025	122	79%	370	99%	492	93%
2026	121	78%	360	96%	481	91%
CHPs not registered						
2020	35	23%	9	2%	44	8%
2021	35	23%	11	3%	46	9%
2022	31	20%	3	1%	34	6%
2023	28	18%	3	1%	31	6%
2024	28	18%	4	1%	32	6%
2025	33	21%	4	1%	37	7%
2026	34	22%	14	4%	48	9%
3A						
Year	# non-transferable	% non-transferable	# transferable	% transferable	# 3A Total	% 3A total
Registered CHPs						
2020	59	69%	323	95%	382	90%
2021	54	64%	315	92%	369	87%
2022	63	74%	323	95%	386	91%
2023	63	74%	330	97%	393	92%
2024	63	74%	328	96%	391	92%
2025	62	73%	334	98%	396	93%
2026	63	74%	336	99%	399	94%
CHPs not registered						
2020	26	31%	18	5%	44	10%
2021	31	36%	26	8%	57	13%
2022	22	26%	18	5%	40	9%
2023	22	26%	11	3%	33	8%
2024	22	26%	13	4%	35	8%
2025	23	27%	7	2%	30	7%
2026	22	26%	5	1%	27	6%

Source: NMFS RAM Division; <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#charter-sport-halibut>, July 13, 2026.

Note: excludes CQE and MWR permits which are not required to be registered annually

Retirement or revocation of CHPs has been rare. Non-transferable permits are invalidated when (1) a permit holder dies or a business entity dissolves; or (2) new shareholders or partners are added to a business. NMFS Restricted Access Management (RAM) Division manages and processes permit transfers and has retired non-transferable CHPs upon receipt of notice of death of an owner or dissolution/change of the associated business. However, RAM is not always notified in the case of a death of a CHP holder or the dissolution of a business and RAM does not have a systematic auditing process to retire CHPs. Thus, a CHP may remain unregistered and unused. **Since 2012, 25 nontransferable CHPs have been retired (Table 4).**

Table 4 Change in number of CHPs, CQEs, and MWR charter permits between 2012 and 2026

Regulatory Area	Permit type	Number of permits (2012)	Number of permits (2026)	Net change in permits (2012-26)
2C	CHPs	534	529	-5
	<i>Non-transferable CHPs</i>	160	155	-5
	<i>Transferable CHPs</i>	374	374	0
	CQE Community CHPs	48	48	0
	MWR CHPs	1	1	0
	Area 2C total	583	578	-5
3A	CHPs	439	426	-13
	<i>Non-transferable CHPs</i>	98	85	-13
	<i>Transferable CHPs</i>	341	341	0
	CQE Community CHPs	63	56	-7
	MWR CHPs	6	6	0
	Area 3A total	508	488	-20
Both areas	Grand total	1,091	1,066	-25

Source: NMFS RAM Division; <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#charter-sport-halibut>, July 13, 2026.

3.2 Request #2 Ownership Transfer and Lease Transfer of CHPs

Transferable CHPs may change ownership over time through a transfer application submitted to NMFS RAM Division.⁵ Permit holders may also submit a transfer application to NMFS if the ownership structure of their charter business changes. In response to data request #2, Table 5 demonstrates the net change in the number of CHP, CQE community CHP, and MWR permit *holders* between 2012 and 2026. This is a simple way to consider consolidation or expansion in the number of CHP holders. Table 5 demonstrates a slight net expansion of ownership in Area 2C (i.e., 10 additional CHP holders). This increase for Area 2C, despite the decline in both non-transferable CHP holders as well as in transferable CHP holders, means that more CHP holders are holding just one type of CHP (either non-transferable or transferable), rather than both. This could be related to some holders divesting transferable CHPs or due to the retirement of some of the non-transferable CHPs. Area 3A ownership data demonstrates net consolidation across all CHP holder types.

Table 6 demonstrates that between 4% and 13% of the transferable CHPs are transferred each year across both areas. In particular, 2021 and 2022 saw a spike in CHP transfer activity. The disruption in the fishery produced by the COVID-19 pandemic as well as the recent requirement to register CHPs may have contributed to this trend.

⁵ Application for transfer of Charter Halibut Permits: <https://media.fisheries.noaa.gov/dam-migration/chp-transfer.pdf>

Table 5 Change in number of CHPs, CQEs, and MWR charter permits HOLDERS between 2012 and 2026

Regulatory Area	Permit type	Number of permit holders (2012)	Number of permit holders (2026)	Net change in permit holders (2012-26)
2C	CHPs	252	262	10
	Non-transferable CHPs	100	96	-4
	Transferable CHPs	198	190	-8
	CQE Community CHPs	12	12	0
	MWR CHPs	1	1	0
	Area 2C total	265	275	10
3A	CHPs	322	280	-42
	Non-transferable CHPs	77	67	-10
	Transferable CHPs	270	218	-52
	CQE Community CHPs	10	8	-2
	MWR CHPs	3	3	0
	Area 3A total	334	290	-44
Both areas	Grand total	599	565	-34

Source: NMFS RAM Division; <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#charter-sport-halibut>, July 13, 2026.

Table 6 CHP transfer activity for Area 2C and 3A, 2011 through 2026

Year	2C				3A				Total	
	CHPs transferred	%*	Seller count	Buyer count	CHPs transferred	%*	Seller count	Buyer count	CHPs transferred	%*
2011	41	11%	29	27	49	14%	47	38	90	13%
2012	14	4%	14	12	25	7%	24	22	39	5%
2013	10	3%	9	10	21	6%	19	21	31	4%
2014	17	5%	16	17	24	7%	23	17	41	6%
2015	24	6%	21	22	23	7%	21	20	47	7%
2016	20	5%	18	18	43	13%	37	30	63	9%
2017	19	5%	15	14	27	8%	21	21	46	6%
2018	21	6%	17	17	19	6%	16	16	40	6%
2019	18	5%	11	14	22	6%	19	17	40	6%
2020	17	5%	8	9	41	12%	28	29	58	8%
2021	63	17%	20	19	28	8%	23	22	91	13%
2022	27	7%	18	18	43	13%	31	28	70	10%
2023	37	10%	20	22	30	9%	21	21	67	9%
2024	28	7%	22	22	26	8%	19	22	54	8%
2025	9	2%	8	9	25	7%	17	17	34	5%
2026	20	5%	12	10	28	8%	17	18	48	7%

Source: NMFS RAM CHP transfer data; compiled by AKFIN

* compared to the 374 transferable CHPs in Area 2C and 341 transferable CHPs in Area 3A (see Table 1).

Leasing of CHPs does not constitute an official transfer through NMFS RAM Division; therefore, NMFS does not have monitoring or reporting ability for this type of temporary transfer. However, since the implementation of CHP registration requirement, the application form⁶ has included the following:

BLOCK C - IDENTIFICATION OF CHARTER HALIBUT PERMITS TO BE REGISTERED	
List the charter halibut permit(s) being registered that are held by the permit holder listed in Block B, and answer the following question for each permit: During the <u>previous fishing year</u> , was financial compensation received for allowing another person to use the permit? For example, leasing a CHP to another guide for payment would qualify as receiving financial compensation. This question does not refer to receiving payment from clients that the CHP holder has guided.	
NOTE: Only CHPs with the same owner(s), ownership percentage(s), affiliate(s), and interest percentage(s) can be registered on the same registration form. Please complete separate registration forms for each CHP with unique ownership or affiliation information.	
Charter Halibut Permit Number:	Financial Compensation Received? Yes ☐ No ☐

Table 7 provides responses to this part of the registration application from 2020-2026. This information constitutes self-report “leasing” and is not further verified. Between 2020 and 2026, financial compensation was reported to be received from an average of 19% of the Area 2C CHPs and 17% of the Area 3A CHPs. The table demonstrates a generally declining trend in reported leasing for both transferable and non-transferable CHPs in both areas. Overall, there were more transferable CHPs reported leased each year (between 39-97 permits in Area 2C and between 28-78 permits in Area 3A) relative to non-transferable CHPs (between 18-32 permits in Area 2C and between 11-23 permits in Area 3A). However, often a greater proportion of the non-transferable CHPs are reported as leased in both areas. In Area 2C, an average of 19% of the non-transferable CHPs were reported to be leased, whereas an average of 16% of the transferable CHPs were reported to be leased. In Area 3A, an average of 29% of the non-transferable CHPs were reported to be leased, whereas an average of 16% of the transferable CHPs were reported to be leased.

⁶ Application for registration of Charter Halibut Permit: <https://media.fisheries.noaa.gov/dam-migration/chp-registration-application.pdf>

Table 7 Financial compensation received from use of a CHP, 2020-2026

Year	Permit type	Area 2C			Area 3A		
		Financial Compensation received?			Financial Compensation received?		
		No	Yes	% Yes	No	Yes	% Yes
2020	Total CHPs	363	122	25.2%	289	96	24.9%
	<i>Non-transferable CHP</i>	95	25	20.8%	42	18	30.0%
	<i>Transferable CHP</i>	268	97	26.6%	247	78	24.0%
2021	Total CHPs	405	80	16.5%	279	90	24.4%
	<i>Non-transferable CHP</i>	97	23	19.2%	37	17	31.5%
	<i>Transferable CHP</i>	308	57	15.6%	242	73	23.2%
2022	Total CHPs	412	89	17.8%	304	93	23.4%
	<i>Non-transferable CHP</i>	97	27	21.8%	44	19	30.2%
	<i>Transferable CHP</i>	315	62	16.4%	260	74	22.2%
2023	Total CHPs	423	79	15.7%	323	77	19.3%
	<i>Non-transferable CHP</i>	105	22	17.3%	40	23	36.5%
	<i>Transferable CHP</i>	318	57	15.2%	283	54	16.0%
2024	Total CHPs	411	90	18.0%	332	64	16.2%
	<i>Non-transferable CHP</i>	95	32	25.2%	43	20	31.7%
	<i>Transferable CHP</i>	316	58	15.5%	289	44	13.2%
2025	Total CHPs	433	60	12.2%	346	51	12.8%
	<i>Non-transferable CHP</i>	104	18	14.8%	46	16	25.8%
	<i>Transferable CHP</i>	329	42	11.3%	300	35	10.4%
2026	Total CHPs	423	59	12.2%	358	39	9.8%
	<i>Non-transferable CHP</i>	103	20	16.3%	52	11	17.5%
	<i>Transferable CHP</i>	320	39	10.9%	306	28	8.4%

Source: NMFS RAM CHP registration; compiled by AKFIN

3.3 Request #3 CHP Use and Angler Effort

The third data request is to provide trends on transferable and non-transferable CHP use. In order to provide this information, ADF&G Saltwater Sportfishing Charter Logbooks (*i.e.*, logbooks or eLogbooks) were used to determine the number of logbook trips and angler-days that were reported for each CHP during each year. For purpose of this discussion paper, these terms are defined as charter vessel-level trips and charter angler-level trips in which halibut was caught and retained, as these trips would require a CHP.⁷ CHP data were merged with logbook data to incorporate CHP characteristics and in the case of request #4, CHP ownership information. These CHP data were pulled from NMFS RAM files for each year from 2018-2025 on 7/21/2026.⁸ Data on CHP use has been collected in logbooks for all years of the CHLAP (2011–2026), but this eight-year subset was the focus in this discussion paper as it represents a

⁷ Note there is a difference here in how these terms are used relative to annual ADF&G analysis of charter halibut management measures (e.g., ADF&G 2025) and under data request #6. These management measure analyses consider angler-days based on halibut retained and/ or bottom fishing effort recorded. This distinction captures trips in which charter anglers may be targeting halibut but are unsuccessful in harvesting one, which is an important part of the metric for assessing harvest per unit effort in the annual management measure analyses.

⁸ CHP files can be accessed at: <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#charter-sport-halibut> These files can be updated daily based on permit transfers that take place inseason.

transition in the ADF&G database (between 2017-2018), as well as the continued improvements in CHP data quality from the more recent years.

Historically, CHP data collected in the paper logbook suffered a lack of precision due to data entry issues common for paper data collection systems. In the past, miss-keyed data, illegible writing, or lost pages have historically affected the precision of CHP data. The eLogbook system and CHP registration have been two contributing factors to improving CHP data quality. The eLogbook system does not allow an invalid number to be entered for a CHP. Additionally, eLogbooks allow a CHP number to be entered once and selected each trip it is used which may also decrease the error associated with continual reentry. However, this process cannot identify if the permit was used by the individual who holds, leased, or borrowed the permit and the eLogbook system does not confirm whether the guide using the CHP number is authorized to do so by the holder. The eLogbooks system became mandatory for Southeast Alaska in 2021 and for Southcentral Alaska in 2025, and it was used voluntarily by operators in each region before these dates as well. As highlighted in Section 3.1, an annual registration process for CHPs began in 2020 to improve the ability to enforce valid CHP use.

Despite the recent improvements to CHP data and increased precision from eLogbook data collection, systematic CHP auditing is limited to ensuring CHPs are entered where halibut were logged, CHPs logged reflect valid/real CHPs per historic RAM CHP files, and that CHPs logged are sufficient to account for the number of anglers harvesting halibut on the trip. While individual records may be reviewed for distinct investigative purposes, auditing all CHP data for accuracy in this manner is not possible. CHP data must therefore be understood to reflect some degree of reporting error. This error will be higher prior to the transition to eLogbooks but continue to exist in the current program. **With the caveat that each data request is expected to include some margin of error, the reader should be cautious of focusing on specific numbers. However, this quality of the CHP data is sufficient to demonstrate high-level trends as requested within the Council motion.**

With the implementation of the RQE Stamp Program in 2026, CHP data quality and accountability is expected to continue to improve for years subsequent to what is provided in this discussion paper. ADF&G Sportfish Division has contributed significantly through changes to the eLogbooks and the increased workload associated with assisting operators through these changes. With this new program, CHPs are now pre-configured for each business and there will likely be increased scrutiny from CHP holders due to their financial responsibility to pay \$20 per stamp. While analysts may still not be able to easily discern the relationship between the CHP user and permit holder, this effort will produce even more reliable CHP data in the future.

Table 8 demonstrates trends in the frequency of CHPs used from 2018 to 2025. These data include CQE and MWR CHP use under non-transferable CHPs. A slightly higher proportion of CHPs have been used in Area 2C (an average of 85% of Area 2C CHPs used) relative to Area 3A (an average of 79% of Area 3A CHPs used) in the timeseries. Both areas have seen a decline in the number of CHPs used, in particular non-transferable CHPs. Both areas show the lowest number of CHPs used in 2020 during the COVID pandemic, with the number of Area 2C transferable CHPs used rebounding to nearly pre-pandemic levels. Area 3A there was a decline in the number of transferable CHP use in 2024 and 2025.

Table 8 Number of active transferable and non-transferable CHPs, 2018-2025

Year	Area 2C = 578 CHPs					
	Non-transferable CHPs	% of used permits non-transferable	Transferable CHPs	% of used permits transferable	Total 2C CHPs used	% total CHPs used
2018	153	29%	366	71%	519	90%
2019	155	30%	369	70%	524	91%
2020	103	26%	300	74%	403	70%
2021	131	27%	354	73%	485	84%
2022	137	28%	359	72%	496	86%
2023	143	29%	357	71%	500	87%
2024	142	28%	365	72%	507	88%
2025	131	26%	364	74%	495	86%
Average	137	28%	354	72%	491	85%
Median	140	28%	362	72%	498	86%
Year	Area 3A = 488 CHPs					
	Non-transferable CHPs	% of used permits non-transferable	Transferable CHPs	% of used permits transferable	Total 3A CHPs	% 3A CHPs used
2018	88	22%	319	78%	407	83%
2019	77	19%	324	81%	401	82%
2020	67	19%	287	81%	354	73%
2021	71	19%	310	81%	381	78%
2022	71	18%	317	82%	388	80%
2023	76	20%	308	80%	384	79%
2024	73	19%	308	81%	381	78%
2025	67	18%	308	82%	375	77%
Average	74	19%	310	81%	384	79%
Median	72	19%	309	81%	383	78%

Source: ADF&G Saltwater logbook data and NMFS RAM CHP data, sourced through ADF&G

Note: includes active CQE and MWR permits which are designated as non-transferable

The total number of charter halibut trips and angler-days by transferable and non-transferable CHPs are included in Table 9 and for all CHPs in Figure 2. This table and figure both demonstrate that more CHP trips occur each year in Area 2C, but more CHP angler-days occur in Area 3A. As can be seen in Table 2, this is likely because the majority of CHPs in Area 2C tend to be endorsed for 4 to 6 anglers, and many more CHPs in Area 3A are endorsed for >6 anglers. There appears to be fairly consistent frequency of use of non-transferable CHPs in Area 2C, representing an average of ~19% of the CHP trips that occurred and an average of 18% of the angler-days that occurred in the timeseries. In Area 3A, frequency of use of non-transferable CHPs has increased slightly in recent years, representing an average of ~12% of CHP trips and 13% of CHP angler-days. Both areas saw a decrease in the number of CHP trips and CHP angler-days between 2024 and 2025.

Table 9 Number of halibut trips and angler-days by transferable and non-transferable CHPs, 2018-2025

Area 2C								
Year	CHP trips				CHP angler-days			
	Non-transferable	Transferable	Total 2C trips	% of trips non-transferable	Non-transferable	Transferable	Total 2C angler-days	% of angler-days with non-transferable
2018	3,889	16,897	20,786	19%	15,619	71,027	86,646	18%
2019	3,724	16,842	20,566	18%	14,706	71,439	86,145	17%
2020	1,850	8,692	10,542	18%	7,034	34,563	41,597	17%
2021	3,906	18,105	22,011	18%	15,385	77,081	92,466	17%
2022	4,554	18,826	23,380	19%	17,741	81,998	99,739	18%
2023	4,655	18,596	23,251	20%	18,718	81,773	100,491	19%
2024	4,719	19,356	24,075	20%	19,312	84,031	103,343	19%
2025	3,980	17,106	21,086	19%	16,178	75,586	91,764	18%
Average	3,910	16,803	20,712	19%	15,587	72,187	87,774	18%
Median	3,943	17,606	21,549	19%	15,899	76,334	92,115	18%
Area 3A								
Year	CHP trips				CHP angler-days			
	Non-transferable	Transferable	Total 3A trips	% of trips non-transferable	Non-transferable	Transferable	Total 3A angler-days	% of angler-days with non-transferable
2018	1,662	13,878	15,540	11%	10,245	91,473	101,718	10%
2019	1,718	14,242	15,960	11%	10,963	94,755	105,718	10%
2020	1,079	10,338	11,417	9%	6,120	64,695	70,815	9%
2021	1,958	16,200	18,158	11%	11,341	109,040	120,381	9%
2022	2,054	15,100	17,154	12%	11,944	103,075	115,019	10%
2023	2,195	13,176	15,371	14%	13,083	90,925	104,008	13%
2024	2,212	13,830	16,042	14%	13,544	94,918	108,462	12%
2025	2,055	13,009	15,064	14%	12,712	88,388	101,100	13%
Average	1,867	13,722	15,588	12%	11,244	92,159	103,403	11%
Median	2,006	13,854	15,750	11%	11,643	93,114	104,863	10%

Source: ADF&G Saltwater logbook data and NMFS RAM CHP data, sourced through ADF&G

Note: includes trips and angler-days from active CQE and MWR permits which are designated as non-transferable

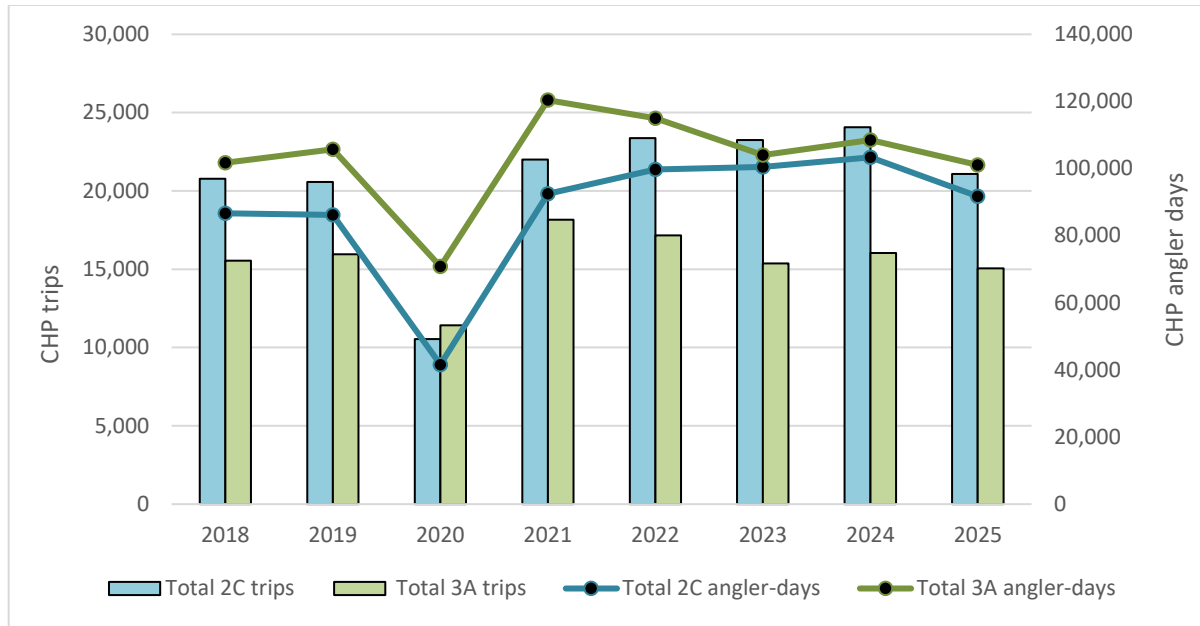


Figure 2 CHP halibut trips and angler days for Area 2C and 3A, 2018-2025

Source: ADF&G Saltwater logbook data and NMFS RAM CHP data, sourced through ADF&G

Table 10 demonstrates the average number of charter halibut trips and angler-days by active transferable and non-transferable CHPs. This table essentially divides the total number of CHP trips and CHP angler days in Table 9 by the total number of active CHPs in Table 8. This table shows that, on average, charter operators in Area 2C used a CHP on an average of 42 trips, with an average of 177 angler-days in the year in the given timeseries. In Area 3A, on average, charter operators used a CHP on an average of 41 trips, with an average of 269 angler-days in the year.

Table 10 Average number of halibut trips and angler-days by transferable and non-transferable CHP, 2018-2025

Area 2C						
Year	Average trips per CHP			Average angler-days per CHP		
	Non-transferable	Transferable	Avg 2C trips (all permits)	Non-transferable	Transferable	Avg 2C angler-days (all permits)
2018	25	46	40	102	194	167
2019	24	46	39	95	194	164
2020	18	29	26	68	115	103
2021	30	51	45	117	218	191
2022	33	52	47	129	228	201
2023	33	52	47	131	229	201
2024	33	53	47	136	230	204
2025	30	47	43	123	208	185
Average	28	47	42	113	202	177
Median	30	49	44	120	213	188
Area 3A						
Year	Average trips per CHP			Average angler-days per CHP		
	Non-transferable	Transferable	Avg 3A trips (all permits)	Non-transferable	Transferable	Avg 3A angler-days (all permits)
2018	19	44	38	116	287	250
2019	22	44	40	142	292	264
2020	16	36	32	91	225	200
2021	28	52	48	160	352	316
2022	29	48	44	168	325	296
2023	29	43	40	172	295	271
2024	30	45	42	186	308	285
2025	31	42	40	190	287	270
Average	25	44	41	153	296	269
Median	28	44	40	164	294	270

Source: ADF&G Saltwater logbook data and NMFS RAM CHP data, sourced through ADF&G

Focusing on 2025 specifically, Figure 3 and Figure 4 illustrate the distribution of CHP trips and CHP angler-days for Area 2C and Area 3A, respectively. Of the Area 2C CHPs, Figure 3 demonstrates that the majority of transferable CHPs in 2025 were used on greater than 26 trips and greater than 100 angler-days each year. Non-transferable CHPs tend to be used less frequently, with the majority of Area 2C non-transferable CHPs used on less than 25 trips and less than 100 angler-days. For Area 3A, Figure 4 demonstrates a similar trend with much more activity from transferable CHPs. Some of the CQE community CHPs contribute to some of the non-transferable CHPs that have little or no use in 2025.

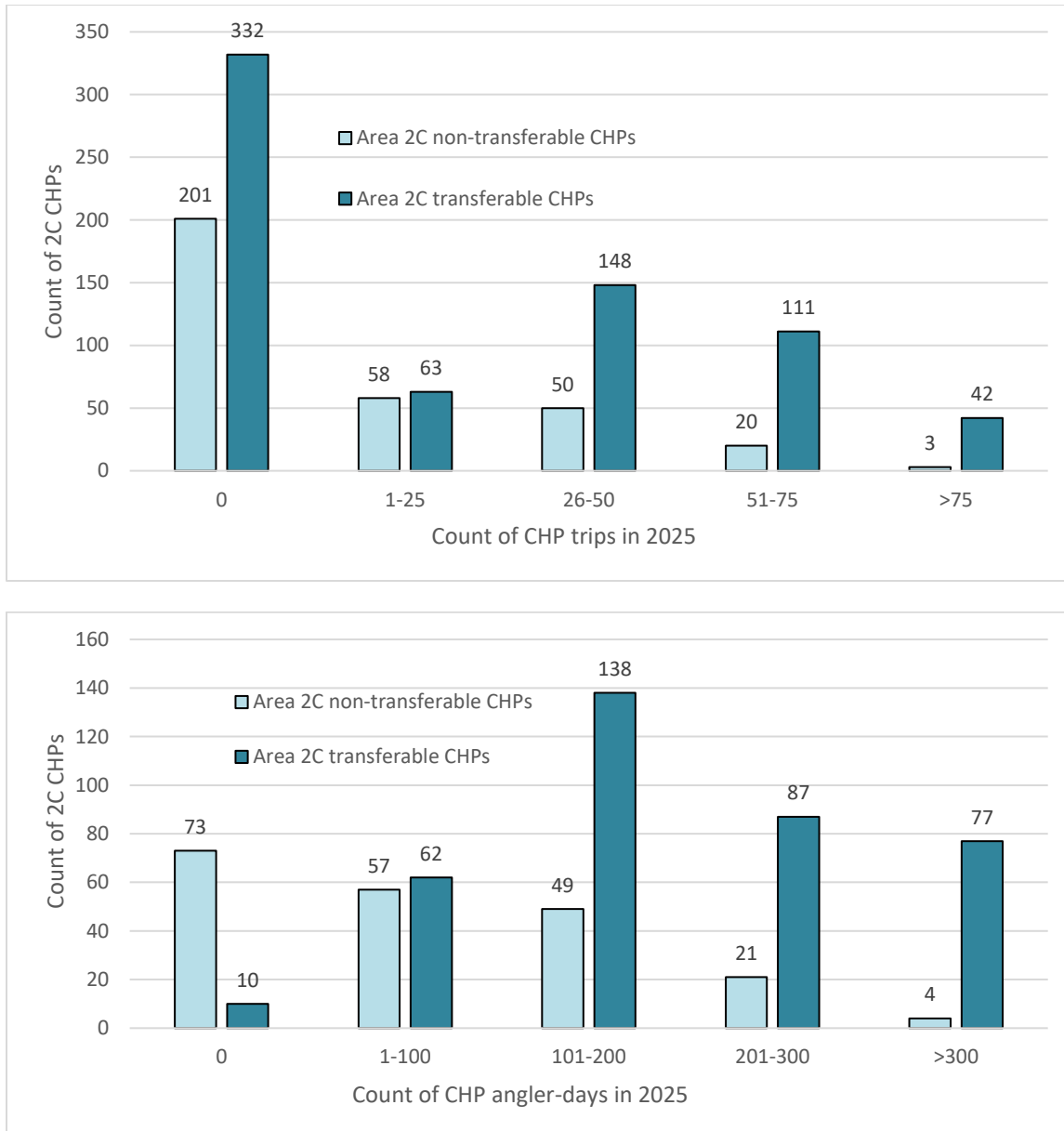


Figure 3 CHP halibut trips and angler days by transferable and non-transferable CHP for Area 2C, 2025

Source: ADF&G Saltwater logbook data and NMFS RAM CHP data, sourced through ADF&G

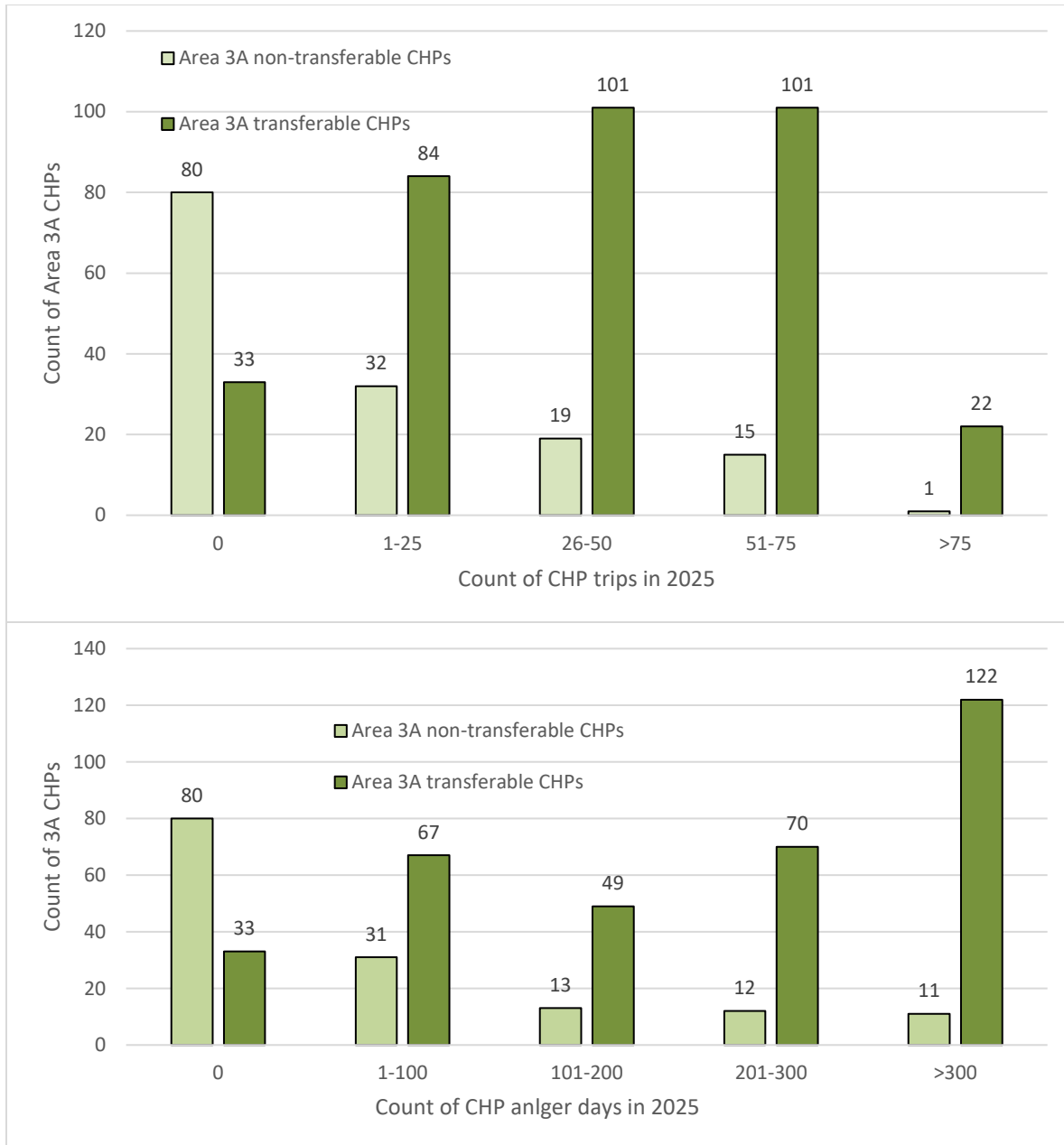


Figure 4 CHP halibut trips and angler days by transferable and non-transferable CHP for Area 3A, 2025

Source: ADF&G Saltwater logbook data and NMFS RAM CHP data, sourced through ADF&G

3.4 Request #4 Use of CQE CHPs Issued to Non-active CQEs

The CQE Program was recommended by the Council in 2002 and implemented by NMFS in 2004 in response to concerns about migration of commercial halibut and sablefish quota share out of small Gulf of Alaska coastal communities (69 FR 23681, April 30, 2004). This Fishery Management Plan (FMP) amendment revised the commercial IFQ Program to allow a distinct set of remote, coastal communities with few economic alternatives to purchase and hold catcher vessel QS in Areas 2C, 3A, and 3B in order to help facilitate access to and sustain participation in the commercial halibut and sablefish fisheries. The CQE program was amended to include Adak in 2014, as the only 4B/ Aleutians Island community that is

part of this program. In total, 46 communities are eligible to form CQEs. As of August 2026, 26 communities had approved CQEs, nine of which hold halibut or sablefish QS.

In 2010, when NMFS implemented the limited entry program for charter halibut fisheries in Area 2C and 3A, it included specific provisions for CQE communities in these two regulatory areas to receive community CHPs at no cost by applying to NMFS (75 FR 554; January 5, 2010). Community CHPs are intended to allow development of a charter vessel fishery in certain rural communities that do not have a developed charter vessel industry.

As of August 2026, 20 CQE communities hold 104 community CHPs. Each of these CQEs were issued the maximum number of community CHPs they can hold. A CQE representing a community or communities in Area 2C can receive a maximum of four community CHPs for each eligible community the CQE represents. A CQE representing a community or communities in Area 3A can receive a maximum of seven community CHPs for each eligible community it represents. The larger number of community permits allowed in Area 3A reflects the larger resource base in that area.

A community CHP has an angler endorsement of six and is nontransferable. CQEs can also purchase and hold up to four (Area 2C) or seven (Area 3A) “regular” (non-community specific) CHPs. While halibut or sablefish IFQ must be leased to community residents (with the temporary exemption for the Adak CQE), this is not a requirement for community CHPs. However, a charter vessel operator who is using a community CHP is required to either begin or end the charter vessel fishing trip within the community designated on the permit.

CQEs are required to submit an annual report on their administrative activities, business operation, and community fishing activities for each calendar year that it holds community CHPs, halibut and sablefish QS and/or community Pacific cod endorsed non-trawl groundfish license limitation program licenses (50 CFR 679.5(t)). For CQEs that hold community CHPs, this report must include nine program-specific reporting elements (50 CFR 679.5(t)(5)(iv)), such as a description of the process used by the CQE to solicit applications from persons to use charter halibut permits that the CQE is holding on behalf of the eligible community. Regulations do not specify a specific consequence of failure to submit the annual report in regard to community CHPs and not all CQE are up to date in submitting annual reports to NMFS. However, NMFS will not approve a CQE’s request to transfer halibut or sablefish QS if they are not up to date on their annual reporting (50 CFR 679.41(c)(10)(ii)). Community CHPs are not subject to annual registration⁹ and they do not require a transfer through RAM to be used by a local charter operator. Thus a community CHP may be in use even if the CQE is not up to date on its annual reporting.

A CQE is a non-profit organization that represents at least one eligible community and has been approved by the Regional Administrator through an application process detailed in 50 CFR 679.41(l). Table 11 demonstrates the current status of these CQEs based on the Department of Commerce, Community and Economic Development (DCCED) searchable database for corporations registered in the State of Alaska (linked below the table). This database demonstrated that four of the 20 registered CQE have lapsed on their business status and therefore may be considered “inactive”.

⁹ In 2020, when CHPs were required to be registered annually, community CHPs and MWR permits were not subject to this requirement. The proposed rule stated that because community CHPs are subject to an annual reporting requirement where CQEs must report ownership and use information, an annual registration to collect information similar to the existing annual report could create unnecessary duplication (84 FR 38912, August 8, 2019).

Table 11 Business status for CQEs that hold community charter permits; July 6, 2026

Area	CQE Entity	Community	State of AK business status*	Also holds IFQ?
2C	ADMIRALTY ISLAND COMMUNITY QUOTA ENTITY	ANGOON	Good Standing	
	COFFMAN COVE COMMUNITY QUOTA ENTITY	COFFMAN COVE	Involuntarily Dissolved 2025	
	EDNA BAY COMMUNITY FISHERIES	EDNA BAY	Involuntarily Dissolved 2022	
	HOONAH COMMUNITY FISHERIES CORP	HOONAH	Good Standing	2C halibut
	HYDABURG COMMUNITY HOLDING CORP	HYDABURG	Involuntarily Dissolved 2022	
	PELICAN FISHING CORPORATION	PELICAN	Good Standing	
	POINT BAKER COMMUNITY FISHERIES CORP	POINT BAKER	Involuntarily Dissolved 2021	
	PORT ALEXANDER COMMUNITY HOLDING-PACHC	PORT ALEXANDER	Good Standing	
	PORT PROTECTION PPCFC	KETCHIKAN	Good Standing	
	TENAKEE SPRINGS BUSINESS ASSOCIATION	TENAKEE SPRINGS	Good Standing	
	THORNE BAY FISHERIES ASSOCIATION	THORNE BAY	Good Standing	2C halibut
	CITY OF WHALE PASS COMMUNITY CHARTER HALIBUT PERMITS MANAGEMENT CORP	WHALE PASS	Good Standing	
3A	CAPE BARNABAS INC.	OLD HARBOR	Good Standing	3A halibut
	CHENEGA HERITAGE INCORPORATED	CHENEGA	Good Standing	
	CITY OF SELDOVIA COMMUNITY HOLDING CORP	SELDOVIA	Good Standing	
	HALIBUT COVE COMMUNITY FISHERIES & MARICULTURE HOLDING COMPANY	HALIBUT COVE	Good Standing	
	LARSEN BAY DEVELOPMENT CO	LARSEN BAY	Good Standing	
	OUZINKIE COMMUNITY HOLDING CORP	OUZINKIE	Good Standing	3A halibut
	PORT GRAHAM CQE INC	PORT GRAHAM	Good Standing	
	PORT LIONS FISHERIES INC	PORT LIONS	Good Standing	3A halibut

* Status was identified by searching the entities through the State of AK Department of Commerce, Community and Economic Development (DCCEC) Searchable database for corporations registered in the State of Alaska (7/2026):
<https://www.commerce.alaska.gov/cbp/main/search/entities>

There were four community CHPs from these four dissolved CQEs that had reported trips in 2025. These four community CHPs each had 10 or fewer trips reported for 2025, thus they may represent reporting errors. For example, the ADF&G Saltwater eLogbook system will not allow an inaccurate CHP number to be inputted, but it does not verify that the user is authorized to use that CHP. If a community CHP held by a CQE that is dissolved or delinquent with the State of Alaska was used to fish, NMFS regulations are silent as to whether a CQE's dissolved or delinquent status invalidates a community CHP issued to that CQE. Likewise, the regulations are silent as to whether the same holds true in the event that a CQE fails to meet annual reporting requirements (50 CFR 679.5(t)). If it is the Council's intent for community CHPs to be invalid when they are held by a CQE that fails to maintain its non-profit entity status or fails to meet its annual reporting requirements under 50 CFR 679.5(t), the Council could recommend that NMFS amend the regulations to clarify this.

CQE community CHP activity has varied over time (see Table 12). Based on the low number of trips for some CQE permits, reported activity likely contains some reporting errors. However, based on the activity represented in Table 12 and the annual reports that are submitted, it is clear that some businesses have been established around access to these permits.

Table 12 CQE charter halibut permit activity, 2018-2025

Area 2C CQE charter permit activity			
Year	Count of CQEs (out of 12)	Count of businesses	Count of trips
2018	11	35	569
2019	10	34	570
2020	9	21	207
2021	10	26	533
2022	9	21	508
2023	8	23	566
2024	8	25	647
2025	9	21	426
Area 3A CQE charter permit activity			
Year	Count of CQEs (out of 8)	Count of businesses	Count of trips
2018	8	22	254
2019	6	18	171
2020	6	11	75
2021	6	19	305
2022	5	11	328
2023	5	16	386
2024	5	14	385
2025	5	11	339

Source: ADF&G Saltwater logbook data and NMFS RAM CHP data, sourced through ADF&G

3.5 Request #5 CHP Holding Caps and Use

The next data request asks for ‘a description of the extent to which businesses which are at the CHP holding cap (5) are also using additional CHPs through lease transfer.’ When this motion was made, staff highlighted challenges in fulfilling this request due to the lack of a clear definition for, and accurate monitoring system to determine use of CHPs through leasing. Section 2.1 further describes some of these challenges and the operational diversity of the sector that may lead to difficulty in identifying the relationship of the permit holder and permit user. It is also possible that CHP holders that are not at the cap or individuals who do not hold CHPs may lease CHPs. However, given the language of the motion, analysts focused the data request around consolidation of CHP use by permit holders at holding cap, rather than explicitly working to define ‘leasing arrangements.’

Using 2026 CHP data, Table 13 demonstrates the distribution of CHP holdings by permit holder. This is done by using the NMFS holder ID (a unique identifier prescribed by RAM) and grouping CHP holders by the number of permits held. This table provides Area-specific holdings and holdings across both areas as some CHP holders own permits in multiple areas. As can be seen in Table 13, for Area 2C there are a

number of permit holders that were ‘grandfathered in’ to the CHLAP with initial issuance of more than 5 CHPs and have maintained their holdings.¹⁰

This table highlights that the vast majority of permit holders hold 1 CHP. Table 13 also highlights the different dynamics between Area 2C holdings and Area 3A holdings. Since most Area 2C CHPs are capped at a 6-angler endorsement (Table 2), a primary way for an Area 2C charter business to increase angler-trips is through buying or leasing more CHPs. Many Area 3A CHPs have an angler endorsement greater than 6. Thus, an Area 3A charter business may also seek out a CHP with a higher angler endorsement, presuming their vessel could accommodate additional anglers. Table 13 demonstrates that in 2026 there were 27 permit holders at or over the cap with Area 2C CHPs compared to 4 permit holders in Area 3A at the cap. Many of the CHP holders that are at the cap are lodges.

Table 13 Count of permit holders by number of CHPs held, 2026

Number of CHPs held	2C	3A	All CHPs
1	174	196	357
2	38	46	81
3	10	18	27
4	13	16	27
5	14	4	24
>5	13	0	13
Total CHP holders	262	280	529

Source: NMFS RAM Division; <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#charter-sport-halibut>, July 13, 2026.

Note: Does not include CQE or MWR permits

In response to data request #5, the list of permit holders with 5 or more CHPs was pulled from NMFS CHP holder data for each year between 2018-2025. Table 14 demonstrates this list included 35-36 permit holders each year. The permit holders that are at the cap varies somewhat each year due to CHP transfer and some changes in holdings.

¹⁰ Regulations at [50 CFR 300.67\(j\)\(1\)](#) states, “a person may not own, hold, or control more than five (5) charter halibut permits except as provided by [paragraph \(j\)\(4\)](#) of this section. NMFS will not approve a transfer application that would result in the applicant that would receive the transferred permit holding more than five (5) charter halibut permits except as provided by [paragraph \(j\)\(6\)](#) of this section.” The exception cited refers to businesses ‘grandfathered’ in with more than 5 CHPs issued during the initial issuance process and transfers that include those grandfathered permits in the full sale of a business.

Table 14 Count of permit holders that hold 5 or more CHPs

Year	2C	3A	All CHPs
2018	25	3	35
2019	25	4	36
2020	24	4	35
2021	25	4	35
2022	24	5	35
2023	28	3	36
2024	27	4	36
2025	27	4	36

Source: NMFS RAM Division; <https://www.fisheries.noaa.gov/alaska/commercial-fishing/permits-and-licenses-issued-alaska#charter-sport-halibut>, July 13, 2026.

Note: Does not include CQE or MWR permits

With this list of permit holders at or above the cap, ADF&G analysts manually assigned the permit holders with their associated ADF&G charter stable business registration number, or ‘BL#’. An ADF&G BL# is a numeric identifier that is issued annually to a business. These numbers are considered ‘stable’ as businesses will be issued the same number annually upon successful application for their registration. NMFS CHP data does not possess any variable that easily matches ADF&G registration data and, as such, connecting NMFS CHP holder data to ADF&G registration or eLogbook data had to be performed manually. NMFS CHP holder data were reviewed first for the business name listed. If this business name matched a similar business name in the ADF&G data, the business was then examined for additional connecting variables such as owner name and CHP numbers used in logbook/eLogbook data. This ensured the appropriate ADF&G business was connected to the NMFS CHP holder data. With this variable applied to the NMFS CHP dataset, ADF&G analysts could then connect NMFS CHP holder data to ADF&G logbook/eLogbook records to determine whether these businesses used additional CHPs in a given year. This allowed the analysts to compare the number of CHPs held by a particular permit holder relative to the number of CHPs used by a distinct ADF&G registered business. Beyond the types of possible CHP reporting errors noted in Section 3.3, this process introduced another degree of challenges relative to matching business names. As the list of CHP holders was truncated to 34-35 permit holders, analysts were able to provide visual comparison to link permit holders to names of registered businesses. Matching business names with CHP holder names is a labor-intensive process that does not yield perfect results. Not all businesses were able to be matched with a permit holder because analysts were unable to identify the business and assign an ADF&G business to them (i.e., could not match their name) or possibly the permit holder did not have any activity.

Table 15 shows activity from 20 - 25 of the businesses that could be matched with the permit holders at the CHP cap. With a few exceptions, most businesses that were evaluated use their full number of associated CHPs or more. Table 15 demonstrates that collectively, these businesses constantly used more CHPs than they hold in aggregate. A business using additional CHPs above the number of permits it holds does not *necessarily* indicate the additional permits were leased. In addition to a leasing arrangement, it may also represent a situation where a guide employed by a business uses their own CHP. This approach does not define this use of CHPs as leasing; however, it is intended to provide a sense of CHP consolidation among businesses and addresses the Council’s request.

The table also demonstrates a large decline in the number of CHPs used by these businesses after 2019. Given that most of the permit holders that have 5 or more CHPs are operating in Area 2C, it is expected that this is at least in part related to the improvement in data quality gained with mandatory transition to eLogbooks for Area 2C in 2021 (and prior voluntary use). As described in Section 3.3, this change has greatly reduced opportunities for reporting errors.

Table 15 Use of CHPs for businesses that are at or above the CHP cap

Year	Number of businesses	CHPs used	CHPs held	Difference
2018	23	326	176	150
2019	24	333	187	146
2020	20	180	152	28
2021	23	191	156	35
2022	25	226	192	34
2023	25	230	183	47
2024	24	227	174	53
2025	23	229	169	60

Source: ADF&G Saltwater logbook data and NMFS RAM CHP data, sourced through ADF&G

3.6 Request #6 Projection of Maximum Effort under Relaxed Management Measures

Next, the Council requested a projection of the maximum charter halibut angler effort that would be possible under a suite of more desirable management measures. More specifically, holding constant the most recent Fishery Constant Exploitation Yield (FCEY), average weight, and harvest (i.e., number of halibut harvested) per unit effort (i.e., angler-days;¹¹ HPUE), project the maximum effort level allowing for the following harvest measures:

Area 2C

- U45O80 reverse slot (i.e., one fish either under 45” or over 80”) with no additional harvest measures
- One fish of any size with no additional harvest measures
- Two fish of any size with no additional harvest measures

Area 3A

- One fish of any size and a second fish of 28” or less, closed Wednesdays, and a one-trip daily limit
- One fish of any size and a second fish of 32” or less, with no additional harvest measures
- Two fish of any size with no additional harvest measures

ADF&G analysts provided this assessment using the Analysis of Management Options for the Area 2C and 3A Charter Halibut Fishery for 2026 (i.e., Management Measures document; ADF&G 2025) for reference (Appendix 1).

¹¹ For this data request, effort is measured in angler-days; any days when bottomfish hours or bottomfish statistical areas were recorded in the logbook or halibut were harvested are considered days with halibut effort, permitting that day was open to harvest of halibut.

3.6.1 Effort Reductions in Area 2C

Holding constant the most recent FCEY, average weight, and HPUE, project the maximum effort level allowing for the following harvest measures:

➤ **U45O80 reverse slot with no additional harvest measures**

Projected removals at U45O80 is 1.119 Mlb in the reverse slot table (Table 2C.4 Management Measures document) compared to the 2025 2C allocation of 0.720 Mlb. Thus, with Area 2C's projected level of effort for 2026 with U45O80, the sector would have been over the 2025 allocation.¹²

Summary statistics for estimating the reductions in effort by subarea and in total for Area 2C that would be needed to reach a U45O80 are included in Table 16. Tuesday effort was back-calculated from Tuesday savings and HPUE in the status quo forecast for 2026, then added to total effort to simulate no closed days. This effort was multiplied by forecasted HPUE from the 2026 status quo management measures analysis to project harvest with no closed days. This harvest forecast was used to create a new reverse slot table. Effort was iteratively adjusted downward until harvest reached a level where U45O80 removals in the reverse slot table were less than or equal to 0.720 Mlb.

As shown in Table 16, in order to remain under an allocation of 0.720 Mlb and still have a U45O80 reverse slot limit, Area 2C effort would have needed to be reduced to 81,348 angler-days. This is a 36% reduction in effort from the 127,106 angler-days that was projected under a U45O80 reverse slot limit for this year. All Area 2C analyses assume a release mortality of 4.1% of yield and an equal reduction of effort in each subarea.

Table 16 Projected effort in 2C required to achieve a U45O80 reverse slot limit with no additional harvest measures

36% reduction in effort					
Subarea	Original 2025 Effort	Plus Tues Effort	Reduced 2025 Effort	HPUE	Projected Harvest
A	25,107	29,585	18,934	0.513	9,713
B	24,766	29,333	18,773	0.832	15,628
C	2,282	2,605	1,667	0.752	1,254
D	32,591	38,109	24,390	0.815	19,871
EF	12,334	14,554	9,315	0.782	7,288
G2C	10,465	12,920	8,269	0.791	6,539
Total 2C	107,545	127,106	81,348	0.741	60,293

Notes: Effort = angler-days, harvest = # of halibut and HPUE = # of halibut/ angler-day
Subarea A = Ketchikan; B = Prince of Wales Island; C = Petersburg/Wrangell; D = Sitka; EF = Juneau/ Haines/ Skagway; G2C = Glacier Bay (2C portion)

¹² This analysis was done for 2026 projected removals with reference to the 2025 charter halibut allocations because this is what was available in December of 2025 for NPFMC consideration. However, the 2026 FCEY adopted by the IPHC led to an Area 2C charter halibut allocation of 650,000 lb and an Area 3A allocation of 1.470 Mlb. Thus, in order to maintain the management measures described in this section for 2026, the effort would have needed to be further reduced from these values because of a lower allocation in both areas.

➤ **One fish of any size with no additional harvest measures**

One fish of any size is equivalent to U50O50 in the reverse slot table (Table 2C.4 Management Measures document). Projected removals at U50O50 is 1.903 Mlb in the reverse slot table compared to the 2025 2C allocation was 0.720 Mlb. Back-calculated Tuesday effort was added to total effort to simulate no closed days in the status quo forecast in the same fashion as the previous analysis. This effort was again multiplied by forecasted HPUE from the 2026 status quo management measures analysis to project harvest with no closed days and used in a new reverse slot table.

Effort was iteratively adjusted downward until harvest reached a level where U50O50 removals in the reverse slot table were less than or equal to 0.720 Mlb. A 62% reduction in effort is required for U50O50 removals to reach a level that is less than or equal to the 2025 allocation of 0.720 Mlb. This assumes equal reduction in each subarea.

Table 17 Projected effort in 2C required to achieve a one fish of any size limit with no additional harvest measures

62% reduction in effort					
Subarea	Original 2025 Effort	Plus Tues Effort	Reduced 2025 Effort	HPUE	Projected Harvest
A	25,107	29,585	11,242	0.513	5,767
B	24,766	29,333	11,147	0.832	9,279
C	2,282	2,605	990	0.752	744
D	32,591	38,109	14,481	0.815	11,798
EF	12,334	14,554	5,531	0.782	4,327
G2C	10,465	12,920	4,910	0.791	3,882
Total 2C	107,545	127,106	48,300	0.741	35,797

Notes: Effort = angler-days, harvest = # of halibut and HPUE = # of halibut/ angler-day
Subarea A = Ketchikan; B = Prince of Wales Island; C = Petersburg/Wrangell; D = Sitka; EF = Juneau/ Haines/ Skagway; G2C = Glacier Bay (2C portion)

➤ **Two fish of any size with no additional harvest measures**

Available data were explored to determine the viability of this analysis. The difficulty is there is no way to know what proportion of anglers would keep 2 vs 1 (or zero) fish. The nearest available data are from 2010, the last time there was a two fish limit in Area 2C. Given how the stock and angler behavior has changed since then, it was deemed this would not provide a meaningful projection.

The analysis above indicates a 62% reduction would be needed to get to one fish of any size. To get to two fish of any size, effort would obviously have to be reduced well more than that. A reduction of that magnitude is not considered beyond this hypothetical exercise.

3.6.2 Effort Reductions in Area 3A

Holding constant the most recent FCEY, average weight, and HPUE, project the maximum effort level allowing for the following harvest measures:

➤ **One fish of any size and a second fish of 28” or less, closed Wednesdays, and a one-trip daily limit**

The 3A allocation in 2025 was 1.480 Mlb. Yield for this scenario is 1.798 Mlb (Table 3A.13 Management Measures document) which would have exceeded the 2025 allocation. Tuesday effort was back-calculated from Tuesday savings and HPUE in the status quo forecast 2026, then added to total effort to simulate no closed Tuesdays. Total effort was multiplied by forecasted HPUE from the 2026 status quo management measures analysis to project harvest with no closed Tuesdays. This harvest forecast was used to create a new version of Table 3A.13 with a range of maximum size limits on one fish in the bag limit and Tuesday closures, including zero closed Tuesdays.

Effort was iteratively adjusted downward until removals were less than or equal to 1.480 Mlb with a maximum size on a second fish of 28 inches. An 18% reduction in effort is required for removals to reach a level that is less than or equal to the Area 3A 2025 allocation of 1.480 Mlb. All Area 3A analyses assume a release mortality of 0.9% of yield and an equal reduction of effort in each subarea.

Table 18 Projected effort in Area 3A required to achieve one fish of any size and a second fish of 28”, closed Wednesdays, and a one-trip daily limit

18% reduction in effort					
Subarea	Original 2025 Effort	Plus Tues Effort	Reduced 2025 Effort	HPUE	Projected Harvest
CCI	11,875	14,903	12,220	1.795	21,936
EPWS	3,737	4,413	3,619	1.397	5,056
G3A	830	1,097	900	0.629	566
H	2,888	3,546	2,908	0.992	2,883
LCI	38,206	47,107	38,628	1.733	66,945
NG	24,131	28,900	23,698	1.337	31,683
QR	10,283	12,073	9,900	1.183	11,712
WPWS	4,642	5,648	4,631	1.098	5,086
Total 3A	96,592	117,685	96,503	1.512	145,867

Notes: Effort = angler-days, harvest = # of halibut and HPUE = # of halibut/ angler-day
Subarea CCI = Central Cook Inlet; EPWS = Eastern Prince William Sound (Valdez); G3A = Glacier Bay (3A portion); H = Yakutat; LCI = Lower Cook Inlet (Homer); NG = North Gulf (Seward); QR = Kodiak; WPWS = Western Prince William Sound (Whittier)

➤ **One fish of any size and a second fish of 32” or less with no additional harvest measures**

The 3A allocation in 2025 was 1.480 Mlb. The least restrictive measures for Area 3A analyzed in the 2026 Management Measures document was a 32” second fish with Wednesdays closed and one-trip daily, which was projected at 1.949 Mlb (Table 3A.13). The scenario under this data request includes open Wednesdays and no trip limits.

Back-calculated Tuesday effort was added to total effort to simulate no closed Tuesdays in the status quo forecast in the same fashion as the previous analysis. Since Wednesday effort was not available, Tuesday effort was used as a proxy for Wednesday effort. So, Tuesday effort was added to total effort twice. This total expanded effort was again multiplied by forecasted HPUE from the 2026 status quo management measures analysis to project harvest with no closed days and used in a new version of Table 3A.13 with a range of maximum size limits on one fish in the bag limit and no closed days. To remove trip limits, the

percent of second plus trips by subarea in 2013 was used, as this was the last year without a trip limit. This was then applied to the projected harvest as a percent increase.

Effort was iteratively adjusted downward until removals were less than or equal to 1.480 Mlb with a maximum size on a second fish of 32 inches. A 42% reduction in effort is required for removals to reach a level that is less than or equal to the 2025 allocation of 1.480 Mlb. This assumes all days open, no trip limits, and equal reduction in each subarea.

Table 19 Projected effort in Area 3A required to achieve one fish of any size and a second fish of 32" with no additional harvest measures

42% reduction in effort							
Subarea	Original 2025 Effort	Plus Tues & Wed Effort	Reduced 2025 Effort	HPUE	Projected Harvest	% Increase No Trip Limit	Projected Harvest No Trip Limit
CCI	11,875	17,931	10,400	1.795	18,668	16.1%	21,680
EPWS	3,737	5,089	2,952	1.397	4,124	0.0%	4,126
G3A	830	1,364	791	0.629	498	0.0%	498
H	2,888	4,204	2,438	0.992	2,418	3.5%	2,503
LCI	38,206	56,008	32,485	1.733	56,298	16.6%	65,634
NG	24,131	33,669	19,528	1.337	26,108	0.4%	26,214
QR	10,283	13,863	8,041	1.183	9,512	0.5%	9,562
WPWS	4,642	6,654	3,859	1.098	4,238	0.2%	4,245
Total 3A	96,592	138,400	80,494	1.512	121,864	10.6%	134,461

Notes: Effort = angler-days, harvest = # of halibut and HPUE = # of halibut/ angler-day
Subarea A = Ketchikan; B = Prince of Wales Island; C = Petersburg/Wrangell; D = Sitka; EF = Juneau/ Haines/ Skagway; G2C = Glacier Bay (2C portion)

➤ Two fish of any size with no additional harvest measures

The same methodology was used as in the previous analysis to project effort with all days open and to expand harvest for no trip limits. Mean weight was adjusted in a modified status quo projection to reflect the mean weight of O27" fish. No additional "high-grading" percentage was assumed with a limit of two fish in this analysis.

Effort was iteratively adjusted downward until removals were less than or equal to 1.480 Mlb. A 57% reduction in effort is required for removals to reach a level that is less than or equal to the 2025 allocation of 1.480 Mlb. This assumes all days open, no trip limits, and equal reduction in each subarea.

Table 20 Projected effort in Area 3A required to achieve two fish of any size with no additional harvest measures

57% reduction in effort							
Subarea	Original 2025 Effort	Plus Tues & Wed Effort	Reduced 2025 Effort	HPUE	Projected Harvest	% Increase No Trip Limit	Projected Harvest No Trip Limit
CCI	11,875	17,931	7,710	1.795	13,840	16.1%	16,073
EPWS	3,737	5,089	2,188	1.397	3,057	0.0%	3,058
G3A	830	1,364	587	0.629	369	0.0%	369
H	2,888	4,204	1,808	0.992	1,793	3.5%	1,856
LCI	38,206	56,008	24,083	1.733	41,738	16.6%	48,659
NG	24,131	33,669	14,478	1.337	19,356	0.4%	19,435
QR	10,283	13,863	5,961	1.183	7,052	0.5%	7,089
WPWS	4,642	6,654	2,861	1.098	3,142	0.2%	3,147
Total 3A	96,592	138,400	59,676	1.512	90,347	10.6%	99,686

Notes: Effort = angler-days, harvest = # of halibut and HPUE = # of halibut/ angler-day
Subarea A = Ketchikan; B = Prince of Wales Island; C = Petersburg/Wrangell; D = Sitka; EF = Juneau/ Haines/ Skagway; G2C = Glacier Bay (2C portion)

3.7 Request #7 Management Measures Under Full RQE Transfer

Data request #7 also relies on Analysis of Management Options for the Area 2C and 3A Charter Halibut Fishery for 2026 (Appendix 1). This request states, holding constant the most recent FCEY,¹³ average weight, HPUE, and angler effort, project the maximum harvest measures available assuming full RQE pools:

- For 2C use a reverse slot table
- For 3A, in order, increase size of the second fish up to 32", open up days of the week

As described in Section 2.2, the RQE has a number of halibut QS transfer limitations, including limits on the total QS that the RQE can hold for each regulatory area. Based on regulations at [50 CFR 679.42\(f\)\(8\)\(ii\)](#), the RQE can hold up to 10% of the 2015 commercial QS pool for Area 2C (5,947,740 QS units) and 12% of the 2015 commercial QS pool for Area 3A (22,187,161 QS units). Linking the cap with the QS pool in a particular year, ensures that the holdings cap does not change in the rare event that the QS pool changes. These proportions are calculated based on the entire QS pool, including categories and blocks of QS units that the RQE is prohibited from purchasing. In addition to restricting how much total QS an RQE can hold, the cumulative limits on holdings also jointly limit the amount of GAF that can be leased from the commercial sector each year. Additional implications of this joint restriction for GAF use are discussed in Section 3.7.3.

3.7.1 Area 2C Management Measures with RQE QS Holdings at the Cap

Table 21 demonstrates the maximum additional pounds that could have been held by the RQE in Area 2C, had the RQE been operating in prior years and held up to the cumulative transfer cap. This is done by converting the Area 2C cumulative cap (5,947,740 units) into pounds using the QS:IFQ ratio generated from historical catch limits within the Catch Sharing Plan (2014-2026). These maximum possible

¹³ In June 2026 during staff tasking the Council clarified an interest in seeing the possible impact of maximum RQE holdings under a range of historical catch limits.

holdings are then summed with the Area 2C charter halibut sector's allocation for each year to demonstrate 'adjusted allocations'.

Table 21 Area 2C charter allocation and maximum pounds available if the RQE had historically held up to the Area 2C cumulative transfer cap

Area 2C (RQE cap of 5,947,740 units)				
Year	Charter allocation (lb)	Ratio (QS: IFQ)	Max RQE holdings (lb)	Adjusted allocation = base allocation + max holdings (lb)
2014	761,000	17.9395	331,544	1,092,544
2015	851,000	16.1667	367,901	1,218,901
2016	906,000	15.1573	392,401	1,298,401
2017	915,000	14.1209	421,201	1,336,201
2018	810,000	16.6603	357,001	1,167,001
2019	820,000	16.4757	361,001	1,181,001
2020	780,000	17.4421	340,999	1,120,999
2021	810,000	16.8491	353,000	1,163,000
2022	820,000	16.9451	351,001	1,171,001
2023	800,000	17.4421	340,999	1,140,999
2024	810,000	16.9935	350,001	1,160,001
2025	720,000	19.3142	307,946	1,027,946
2026	650,000	21.1198	281,619	931,619

Source: Allocations sourced from ADF&G informational handout Oct, 2025
https://meetings.npfmc.org/CommentReview/DownloadFile?p=43153176-a72c-49eb-919b-95acaf8c4efd.pdf&fileName=InfoHandoutADF%26G_2025_10.25.pdf, Ratio sourced from NMFS QS pool and TAC;
<https://www.fisheries.noaa.gov/alaska/sustainable-fisheries/alaska-fisheries-management-reports#ifq-halibutsablefish>

As described in the data request, the ADF&G management measure analyses can be used to consider what types of measures may have been afforded in 2026 with additional pounds from RQE holdings. This is a similar methodology used in NMFS (2018a) when the RQE program was being developed, to consider potential implications of an RQE with the maximum amount of holdings, and under "higher" and "lower" allocations. As was the case in that analysis, **this hypothetical exercise is not a projection for the future** because each year exhibits different trends of angler effort, HPUE and different average weight for halibut caught, along with changing halibut abundance and FCEY. Moreover, **historical years also exhibited different trends in these factors**, thus repeating this exercise for these years would consist of applying the adjusted charter allocation (allocation + maximum holdings) to the ADF&G management measures analysis for that year to understand what hypothetically may have been possible in that year with the RQE holding QS up to the cumulative cap.

However, this exercise does provide some benchmark as to what could have been chosen for 2026 charter halibut management measures, given projected harvest and an RQE holding QS up to the cap. More specifically, in 2026, the Area 2C charter allocation (including estimated discard mortality) was 650,000 pounds. The management measures for Area 2C included:

- *One fish daily bag limit*: Charter vessel anglers may catch and retain one halibut per day.
- *Reverse slot limit*: Retained halibut must be less than or equal to 34 inches or greater than or equal to 80 inches in length (i.e., U34O80).
- *Thursday closures*: Charter vessel anglers in Area 2C may not catch and retain halibut (except GAF) on all Thursdays beginning June 18 and continuing through September 10.

Under this combination of measures, Area 2C had projected removals of 647,065 pounds in 2026, using both Table 2C.4 and Table 2C.6 from the management measures analysis (ADF&G 2025). This combination of measures was chosen for Area 2C in 2026 because it was identified as the least restrictive option, while still maintaining a projected level of removals under the allocation.¹⁴

Holding constant the projected trends in angler effort, HPUE and average weight for 2026, if the RQE had hypothetically held up to the Area 2C cap by October 1 of 2025, it would have added an additional 281,619 pounds to the area's charter allocation. This would have represented a total 'adjusted' allocation of 931,619 pounds. Based on Table 2C.4 from the management measures analysis (repeated in Table 22 below), the measures for Area 2C would not need to include any day of the week closures and the reverse slot limit could have been adjusted to U38O76.¹⁵

The highest allocation shown in Table 21 for Area 2C would have been in 2017, with a base allocation of 915,000 lb and maximum RQE holdings of an additional 421,201 lb (1,336,201 lb in total). Based on the projected trends in angler effort, HPUE and average weight for 2026, had the 2017 allocation of 915,000 lb been available in 2026, Area 2C management measures may have been U50O74 with no days of the week closed or other measures needed. This demonstrates that, under 2026 projected harvest, the highest allocation of the timeseries plus the maximum RQE holdings would have greatly relaxed the management measures Area 2C, but would not have reached a 1-fish of any size limit in Area 2C. It is important to caveat that in this scenario, the higher abundance of the halibut may also be endogenous to projected variables (e.g., higher abundance scenarios could inherently affect projected HPUE such that projected harvest could be different).

¹⁴ See Charter Halibut Management Committee Report (December 3, 2025) for rationale around progression of measures recommended for 2026: <https://meetings.npfmc.org/CommentReview/DownloadFile?p=816d039c-3bfc-476f-944d-8d83b3cd9f1f.pdf&fileName=C7%20Dec2025%20Charter%20Halibut%20Management%20Committee%20Report.pdf>

¹⁵ This assumes that the charter sector would first work to increase the lower slot limit and only adjust the upper slot limit given the additional allocation that does not allow for an additional inch on the lower slot limit. This is typically the pattern recommended by the Charter Halibut Management Committee for Area 2C.

Table 22 Projected charter removals (Mlb, includes release mortality) for Area 2C in 2026 under reverse slot limits ranging from U32O50 to U50O80 with a 1-fish bag limit

Harvest = 94,207

Lower Limit (in)	50	52	54	56	58	60	62	64	66	68	70	72	74	76	78	80	Amount of release mortality at uXo80
32	1.411	1.308	1.231	1.145	1.083	1.028	0.949	0.874	0.831	0.799	0.766	0.744	0.713	0.695	0.693	0.679	0.027
33	1.439	1.337	1.261	1.175	1.115	1.059	0.981	0.906	0.864	0.831	0.799	0.777	0.746	0.728	0.726	0.712	0.028
34	1.472	1.372	1.297	1.212	1.151	1.096	1.019	0.944	0.902	0.870	0.837	0.815	0.785	0.767	0.765	0.751	0.030
35	1.497	1.398	1.323	1.239	1.179	1.124	1.047	0.973	0.931	0.899	0.867	0.845	0.814	0.796	0.794	0.781	0.031
36	1.537	1.440	1.367	1.284	1.224	1.170	1.094	1.020	0.978	0.946	0.914	0.893	0.862	0.844	0.842	0.829	0.033
37	1.562	1.466	1.393	1.311	1.252	1.198	1.122	1.049	1.007	0.975	0.944	0.922	0.891	0.874	0.872	0.858	0.034
38	1.599	1.504	1.433	1.351	1.293	1.240	1.164	1.092	1.051	1.019	0.987	0.966	0.935	0.918	0.916	0.902	0.036
39	1.626	1.533	1.462	1.382	1.324	1.271	1.196	1.124	1.083	1.051	1.020	0.998	0.968	0.951	0.948	0.935	0.037
40	1.649	1.557	1.487	1.407	1.350	1.297	1.223	1.151	1.110	1.079	1.048	1.026	0.996	0.979	0.977	0.963	0.038
41	1.677	1.586	1.517	1.438	1.381	1.329	1.255	1.184	1.144	1.112	1.081	1.060	1.030	1.012	1.010	0.997	0.039
42	1.695	1.606	1.537	1.459	1.403	1.351	1.277	1.207	1.166	1.135	1.104	1.083	1.053	1.036	1.034	1.020	0.040
43	1.715	1.627	1.559	1.481	1.426	1.374	1.301	1.231	1.191	1.160	1.129	1.108	1.078	1.061	1.059	1.045	0.041
44	1.744	1.658	1.591	1.514	1.459	1.408	1.335	1.266	1.226	1.195	1.164	1.143	1.113	1.096	1.094	1.081	0.043
45	1.776	1.691	1.625	1.549	1.495	1.444	1.372	1.303	1.263	1.232	1.202	1.181	1.151	1.134	1.132	1.119	0.044
46	1.797	1.713	1.648	1.573	1.519	1.469	1.398	1.329	1.289	1.259	1.228	1.207	1.178	1.161	1.159	1.146	0.045
47	1.826	1.744	1.680	1.605	1.552	1.503	1.432	1.363	1.324	1.294	1.263	1.242	1.213	1.196	1.194	1.181	0.047
48	1.847	1.765	1.702	1.628	1.576	1.526	1.456	1.388	1.349	1.319	1.288	1.267	1.238	1.221	1.219	1.206	0.047
49	1.880	1.800	1.738	1.665	1.613	1.565	1.495	1.427	1.388	1.358	1.328	1.308	1.279	1.262	1.260	1.247	0.049
50	1.903	1.825	1.764	1.692	1.640	1.592	1.523	1.456	1.417	1.387	1.358	1.337	1.308	1.291	1.289	1.276	0.050

Source: Table 2C.4 from ADF&G (2025)

Notes: All values in the table include corrections for errors in estimation of average weight and inflation factors for release mortality. The harvest projection is for all days open throughout the season. The last column is the release mortality estimate (Mlb) for the UXO80 removal estimates.

The yellow highlighted cell represents the best combination of Area 2C measures that could have been achieved with 2026 projected removals and an Area 2C charter allocation that is adjusted with the full RQE cumulative limit in 2026. The blue highlighted cell represents the best combination of Area 2C measures that could have been achieved with 2026 projected removals and the highest Area 2C charter allocation from the timeseries (2017) that is adjusted with the full RQE cumulative limit in that year. The Area 2C management measures adopted for 2026 are not included in this table as they include reduced harvest from Thursday closures.

Table 23 demonstrates the hypothetical charter halibut management measures for Area 2C in 2026 using the adjusted charter halibut allocations (base allocation + maximum RQE holdings) from each year in the timeseries. These management measures *do not* represent what could have hypothetically occurred in each year, as each year presents different effort and harvest projections. Instead, these measures are what could have hypothetically occurred in 2026 using Table 22 (Table 2C.4 from ADF&G (2025)), with the adjusted allocations from previous years applied. While projections of harvest and effort will likely continue to vary in the future due to external factors (*e.g.*, angler demand), this exercise holds these factors constant and considers management measures that may be achieved under different adjusted allocations.

Table 23 Hypothetical charter halibut management measures for Area 2C in 2026 using the adjusted charter halibut allocations (base allocation + maximum RQE holdings) from the timeseries, applied to 2026 projected harvest

Year	Adjusted allocation = base allocation + max holdings (lb)	Hypothetical 2026 management measures under adjusted allocations from previous years and 2026 projected harvest
2014	1,092,544	U44 O80
2015	1,218,901	U48 O78
2016	1,298,401	U50 O76
2017	1,336,201	U50 O74
2018	1,167,001	U46 O76
2019	1,181,001	U47 O80
2020	1,120,999	U45 O80
2021	1,163,000	U46 O76
2022	1,171,001	U46 O76
2023	1,140,999	U45 O76
2024	1,160,001	U46 O78
2025	1,027,946	U42 O80
2026	931,619	U38 O76

Notes" The yellow row represents the best combination of Area 2C measures that could have been achieved with 2026 projected harvest and an Area 2C charter allocation that is adjusted with the full RQE cumulative limit in 2026. The blue row represents the best combination of Area 2C measures that could have been achieved with 2026 projected harvest and the highest Area 2C charter allocation from the timeseries (2017) that is adjusted with the full RQE cumulative limit in that year.

3.7.2 Area 3A Management Measures with RQE holdings at the Cap

Table 24 demonstrates the maximum additional pounds that could have been held by the RQE in Area 3A, had the RQE been operating in prior years and held up to the cumulative transfer cap. This is done by converting the Area 3A cumulative cap (22,187,161 units) into pounds using the QS:IFQ ratio generated from historical catch limits within the CSP (2014-2026). These maximum possible holdings are then summed with the Area 3A charter halibut sector's allocation for each year to demonstrate 'adjusted allocations'. If the RQE had held this amount of RFQ in these years, these additional pounds could have contributed to less restrictive management measures for Area 3A.

Table 24 Area 3A charter allocation and maximum pounds available if the RQE had historically held up to the Area 3A cumulative transfer cap

Area 3A (RQE cap of 22,187,161 units)				
Year	Charter allocation (lb)	Ratio (QS: IFQ)	Max RQE holdings (lb)	Adjusted allocation = base allocation + max holdings (lb)
2014	1,782,000	25.2664	878,129	2,660,129
2015	1,890,000	13.3991	1,655,869	3,545,869
2016	1,814,000	15.508	1,430,691	3,244,691
2017	1,890,000	13.914	1,594,593	3,484,593
2018	1,790,000	25.1555	882,000	2,672,000
2019	1,890,000	22.9396	967,199	2,857,199
2020	1,710,000	26.226	845,999	2,555,999
2021	1,950,000	20.1724	1,099,877	3,049,877
2022	2,110,000	19.3605	1,146,001	3,256,001
2023	1,890,000	23.5833	940,800	2,830,800
2024	1,890,000	24.4567	907,202	2,797,202
2025	1,480,000	31.2557	709,860	2,189,860
2026	1,470,000	30.9962	715,803	2,185,803

Source: Allocations sourced from ADF&G informational handout Oct, 2025

https://meetings.npfmc.org/CommentReview/DownloadFile?p=43153176-a72c-49eb-919b-95acaf8c4efd.pdf&fileName=InfoHandoutADF%26G_2025_10.25.pdf

Ratio sourced from NMFS QS pool and TAC; <https://www.fisheries.noaa.gov/alaska/sustainable-fisheries/alaska-fisheries-management-reports#ifq-halibutsablefish>

In 2026, the Area 3A charter allocation (including estimated discard mortality) was 1,470,000 pounds. The management measures for Area 3A included:

- *Two fish daily bag limit:* Charter vessel anglers may catch and retain two halibut per day.
- *27-inch maximum size limit on one fish:* Charter vessel anglers may keep one fish of any size per day and one fish that is no more than 27 inches in length. The 27-inch maximum size limit allows anglers to keep a second fish that weighs approximately 9 pounds, round weight.
- *Tuesday and Wednesday closures:* Charter vessel anglers may not catch and retain halibut (except GAF) on all Wednesdays and on Tuesdays from June 2 through August 25 (13 Tuesdays closed).
- *Trip limit:* Charter vessels may only take one trip during which charter vessel anglers retain halibut per day. Charter halibut permits may only be used for one charter halibut fishing trip per day during which charter vessel anglers retain halibut.

Under this combination of measures, Area 3A had projected removals of 1,466,000 pounds in 2026, based on Table 3A.13 from the ADF&G analysis (2025). This combination of measures was chosen for Area 3A in 2026 because it was identified as the least restrictive option, while still maintaining a projected level of removals under the allocation.¹⁶

¹⁶ See Charter Halibut Management Committee Report for rationale around progression of measures recommended for 2026 (December 3, 2025) :

For Area 3A, the motion requests an evaluation of the maximum harvest measures available assuming the RQE holds up to the full cumulative limits by increasing size of the second fish up to 32", and then open up days of the week, in this order. Holding constant the projected trends in angler effort, HPUE and average weight for Area 3A in 2026, if the RQE had hypothetically held up to the Area 3A cap by October 1 of 2025, it would have added an additional 715,803 pounds to the area's charter allocation. This would have represented a total adjusted allocation of 2,185,803 pounds for 2026 (Table 24).

There is no analysis in the 2025 ADF&G document projecting harvest for this allocation level. All analysis provided for Area 3A includes Wednesday closures throughout the season and the largest size limit considered for the second fish is a U32. Table 3A.13 in the ADF&G analysis (reproduced below as Table 25 projects this scenario (i.e., two fish limit, one any size, one U32, Wednesday closures all year, one trip per vessel per day and per permit per day) to yield 1,949,000 pounds. It is clear that the 236,803 additional pounds from the adjusted allocation in 2026 could have continued to relax management measures in Area 3A beyond this point. However, without further analysis, it is not clear how many additional inches the size limit could be raised, or how many additional Wednesdays may be opened in this year (assuming the order directed in the motion).

The 2024 Analysis of Management Options for the Area 2C and 3A Charter Halibut Fisheries for 2025 (ADF&G 2024) did include an assessment of opening Wednesdays to charter halibut fishing in Area 3A. If all Wednesdays were open in 2025, Table 3A.15 from ADF&G (2024; included below as Table 26), demonstrates that based on projections for 2025, removals in Area 3A ranged from 1,979,000 pounds (with a U26 limit on one fish) to 2,289,000 pounds (with a U32 limit on one fish). If the RQE held the maximum amount of halibut QS in Area 3A, the adjusted allocation of 2,189,860 pounds for 2025 (Table 24) may have resulted in the size limit on one fish of U32 with five Wednesdays closed (and other status quo management measures). Alternatively, if a different order of measures were chosen, with this adjusted allocation in 2025, all days of the week may have been open to charter halibut fishing with a U30 size limit on one fish.

<https://meetings.npfmc.org/CommentReview/DownloadFile?p=816d039c-3bfc-476f-944d-8d83b3cd9f1f.pdf&fileName=C7%20Dec2025%20Charter%20Halibut%20Management%20Committee%20Report.pdf>

Table 25 Area 3A projected removals for 2026 under a range of maximum size limits on one fish in the bag limit and Tuesday closures. Projected removals assume the following status quo measures: two fish bag limit – one of any size, one under X inches, limit of one trip per vessel and one trip per permit per day, and Wednesday closure all year.

Number of Tuesdays closed	Size limit for second fish						
	26	27	28	29	30	31	32
All	1.403	1.430	1.472	1.498	1.536	1.562	1.595
27	1.403	1.430	1.472	1.498	1.537	1.562	1.596
26	1.403	1.430	1.472	1.498	1.537	1.562	1.596
25	1.404	1.430	1.473	1.499	1.537	1.563	1.596
24	1.404	1.430	1.473	1.499	1.537	1.563	1.596
23	1.404	1.430	1.473	1.499	1.537	1.563	1.596
22	1.405	1.432	1.474	1.500	1.539	1.564	1.598
21	1.405	1.432	1.474	1.501	1.539	1.564	1.598
20	1.406	1.432	1.475	1.501	1.539	1.565	1.598
19	1.409	1.436	1.478	1.504	1.543	1.568	1.602
18	1.411	1.437	1.480	1.506	1.544	1.570	1.604
17	1.413	1.440	1.482	1.509	1.547	1.573	1.607
16	1.418	1.445	1.487	1.514	1.552	1.578	1.612
15	1.421	1.448	1.490	1.517	1.556	1.581	1.615
14	1.429	1.456	1.499	1.526	1.565	1.591	1.625
13	1.439	1.466	1.510	1.537	1.576	1.602	1.636
12	1.450	1.478	1.521	1.549	1.588	1.614	1.649
11	1.468	1.496	1.540	1.568	1.607	1.634	1.669
10	1.478	1.505	1.550	1.578	1.618	1.645	1.680
9	1.495	1.523	1.568	1.596	1.637	1.664	1.700
8	1.516	1.544	1.590	1.618	1.659	1.687	1.723
7	1.533	1.561	1.608	1.636	1.678	1.706	1.742
6	1.558	1.587	1.634	1.663	1.705	1.734	1.771
5	1.582	1.612	1.660	1.689	1.732	1.761	1.799
4	1.610	1.641	1.689	1.719	1.763	1.792	1.831
3	1.641	1.671	1.721	1.752	1.796	1.826	1.865
2	1.670	1.701	1.752	1.783	1.828	1.859	1.899
1	1.688	1.720	1.771	1.802	1.848	1.879	1.919
0	1.714	1.746	1.798	1.830	1.877	1.908	1.949

Source: Table 3A.13 from ADF&G (2025)

Note: All values in the table include corrections for errors in estimation of average weight and inflation factors for release mortality. The grey highlighted cell represents the Area 3A projected removals under the adopted management measures. The yellow highlighted cell represents the best combination of Area 3A measures that could have been achieved from this table, with 2026 projected removals and an Area 3A charter allocation that is adjusted with the full RQE cumulative limit in any year from the CSP.

Table 26 Area 3A removals for 2025 under a range of maximum size limits on one fish in the bag limit and Wednesday closures. Projected removals assume the following status quo measures: two fish bag limit – one of any size, one under X inches, limit of one trip per vessel and one trip per permit per day.

Number of Wednesdays closed	Size limit for second fish						
	26	27	28	29	30	31	32
All	1.677	1.710	1.762	1.796	1.844	1.877	1.919
14	1.709	1.743	1.796	1.830	1.879	1.912	1.956
13	1.736	1.770	1.824	1.859	1.909	1.942	1.986
12	1.764	1.799	1.854	1.889	1.940	1.974	2.019
11	1.793	1.829	1.884	1.920	1.972	2.007	2.052
10	1.809	1.845	1.901	1.937	1.989	2.025	2.070
9	1.836	1.872	1.929	1.965	2.019	2.054	2.101
8	1.859	1.895	1.953	1.990	2.044	2.080	2.127
7	1.878	1.915	1.973	2.010	2.065	2.101	2.149
6	1.898	1.936	1.995	2.033	2.088	2.124	2.173
5	1.913	1.951	2.011	2.049	2.104	2.141	2.190
4	1.926	1.964	2.024	2.062	2.118	2.155	2.204
3	1.938	1.977	2.037	2.075	2.131	2.169	2.218
2	1.949	1.988	2.049	2.087	2.144	2.182	2.231
1	1.958	1.997	2.057	2.096	2.152	2.191	2.265
0	1.979	2.018	2.079	2.119	2.175	2.214	2.289

Source: Table 3A.13 from ADF&G (2024)

Note: All values in the table include corrections for errors in estimation of average weight and inflation factors for release mortality. The yellow highlighted cell represents the options for Area 3A measures that could have been achieved with 2025 projected removals and a 2025 Area 3A charter allocation that is adjusted with the full RQE cumulative limit. The blue highlighted cell represents the best combination of Area 3A measures that could have been achieved with 2025 projected removals and the highest Area 3A charter allocation from the timeseries (2015) that is adjusted with the full RQE cumulative limit in that year.

Table 27 demonstrates the difference between the adjusted allocations for each year in Area 3A (Table 24) and the projected yield of 2.289 Mlb for the least restrictive combination of measures considers for 2025. Comparing this information demonstrates that the adjusted allocation from most years would have been sufficient to achieve all days of the week open to charter halibut fishing, with a U32 or greater size limit on one fish in 2025. Moreover, given the substantial difference in the adjusted allocation in many years relative to the projected removals under the least restrictive measure analyzed (blue cell in Table 26), the adjusted allocations from many years could have led to even less restrictive measures in 2025. Again, given the wide variance in the other input factors affecting management measures, the results are best understood as measures that may have been afforded in projected 2025 conditions under different allocation amounts rather than measures that may have been set in other years with maximum RQE holdings.

Table 27 Comparison of maximum Area 3A adjusted charter allocation relative to the projected removals for Area 3A in 2025 for the least restrictive management measures

Year	Adjusted allocation = base allocation + max holdings (lb)	Difference between adjusted allocation from each year and 2.289 Mlb projected removals for 2025 least restrictive management measures*
2014	2,660,129	371,129
2015	3,545,869	1,256,869
2016	3,244,691	955,691
2017	3,484,593	1,195,593
2018	2,672,000	383,000
2019	2,857,199	568,199
2020	2,555,999	266,999
2021	3,049,877	760,877
2022	3,256,001	967,001
2023	2,830,800	541,800
2024	2,797,202	508,202
2025	2,189,860	-99,140
2026	2,185,803	-103,197

Notes: * as can be seen in Table 25, 2,289,000 pounds was the projected removals in 2025 for Area 3A with management measures that included a size limit on one fish of U32, no day of the week closures, and other status quo measures listed.

3.7.3 Additional Considerations for Guided Angler Fish

In addition to restricting how much total QS an RQE can hold, the cumulative limits also jointly restrict the amount of GAF that can be leased each year. When the CSP was implemented in 2014, it included provisions for limited annual transfers (leases) of individual fishing quota (IFQ) from the commercial sector as GAF to qualified CHP holders for harvest by charter vessel anglers. When charter management measures place size or harvest restrictions on charter anglers, qualified CHP holders may offer GAF to charter anglers as a means for the angler to retain halibut of any size and up to the limits allowed for unguided anglers. The use of GAF allows charter vessel anglers in Areas 2C and 3A to harvest up to two halibut of any size per day, and fish on days otherwise closed to halibut retention by guided anglers. While the RQE may increase the charter sector's adjusted allocation through RFQ holdings and relax management measures for the sector as a whole across one management area, GAF can provide additional opportunity for an individual angler (e.g., a different sized-fish, second fish) and for an operator (e.g., taking anglers halibut fishing on a day that is otherwise closed).

As described in Section 2.2, this cumulative limit for Area 2C is 10% of the total commercial IFQ allocation in Area 2C (5,947,740 units) and 12% of the total commercial IFQ allocation in Area 3A (22,187,161 units). Regulations state that RQE holdings will be assessed as of October 1 in the year prior to establishing management measures and GAF transfers will then be restricted such that in any year, the combined amount of RFQ and GAF transferred to CHP holders could not exceed a poundage equal to the maximum amount of pounds that could be issued as RFQ in Area 2C or 3A ([50 CFR 300.65\(c\)\(5\)\(ii\)\(D\)\(I\)\(iv\)](#)). Because GAF is an annual lease that represents a temporary transfer of halibut IFQ, the amount of RFQ held will essentially establish the remainder for GAF.

As can be seen in the 2025 GAF Report and Table 28 below, the use of GAF to supplement angler opportunities has increased in recent years in both Area 2C and Area 3A (NMFS 2025). In particular, it

has become of increasing importance for some Area 2C operations since 2020, with 264,674 lb of IFQ transferred in 2025. This leaves ~ 43,000 pounds from the joint cumulative limit that will be shared by RQE and GAF transfers. If the RQE begins to acquire RFQ in Area 2C, but management measures remain restrictive, this may be a point of tension for some charter operations in this area that have come to rely on use of GAF. In Area 3A, net pounds of halibut harvested as GAF increased from 5,509 lb to 45,799 lb in 2025. In this area, use of GAF has historically been lower, likely due to the marginal benefit associated with GAF in Area 3A versus Areas 2C (i.e., a greater sized second fish versus one additional fish of any size). Increased use in 2025 may be linked to additional day of the week closures and/or recent changed restrictions on IFQ medical lease transfer, which may have provided more of a market for GAF.

Table 28 Summary of GAF IFQ transfers and net pounds harvested, 2014- 2025

Year	Area 2C			Area 3A		
	IFQ lb transferred	Net lb harvested as GAF	Cumulative RQE-GAF transfer limit (converted into lb)	IFQ lb transferred	Net lb harvested as GAF	Cumulative RQE-GAF transfer limit (converted into lb)
2014	29,498	53,864	331,544	11,654	10,336	878,129
2015	36,934	27,849	367,901	10,337	5,158	1,655,869
2016	47,064	38,968	392,401	10,442	9,332	1,430,691
2017	53,206	40,860	421,201	9,786	6,920	1,594,593
2018	80,656	64,365	357,001	12,760	9,052	882,000
2019	97,680	75,039	361,001	13,524	10,652	967,199
2020	57,645	55,061	340,999	5,240	2,147	845,999
2021	97,056	76,529	353,000	11,913	3,446	1,099,877
2022	128,094	99,962	351,001	11,475	6,487	1,146,001
2023	143,520	109,952	340,999	17,089	8,430	940,800
2024	175,070	147,739	350,001	20,677	5,509	907,202
2025	264,674	230,541	307,946	64,752	45,799	709,860

Source: 2025 GAF Report (NMFS 2025)

4 Next Steps

This discussion paper does not direct a specific action moving forward. No action is required; however, input from the Charter Halibut Management Committee, Advisory Panel, and the public may direct if and how the Council may move forward with any additional work and/ or proposed regulatory changes. Further consideration of regulatory action could include the tasking of an expanded discussion paper or if a purpose and need statement and set of action alternatives are identified, through tasking of an initial review analysis.

5 References

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