



NOAA
FISHERIES

Pacific Halibut Area 2A

Annual Enforcement Report

NOAA Fisheries Office of Law Enforcement
West Coast Division

December 2024

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WEST COAST ENFORCEMENT - OVERVIEW



NOAA's Office of Law Enforcement (OLE) protects marine wildlife and habitat by enforcing domestic laws and international treaty requirements implemented to ensure these global resources are available for future generations. Enforcement of the commercial, tribal, and recreational Pacific halibut fisheries in International Pacific Halibut Commission (IPHC) Area 2A is an ongoing multi-agency effort performed cooperatively by NOAA Fisheries Office of Law Enforcement (OLE) West Coast Division (WCD), the U.S. Coast Guard (USCG), Washington Department of Fish and Wildlife Police (WDFW), Oregon State Patrol Fish and Wildlife Division (OSP), California Department of Fish and Wildlife Enforcement Division (CDFW), and Tribal Enforcement. The 2024 Pacific Halibut Area 2A Enforcement Report summarizes the collective effort, actions, and results of the IPHC Area 2A cooperating federal and state entities, and includes the individual state enforcement reports as attachments. Tribal enforcement activities and compliance data are not provided in this overview.

Tables 1 through 3 present a consolidated summary of IPHC Area 2A Commercial-Directed, Commercial-Incidental and Recreational enforcement statistics for 2024 using available data elements provided by OLE, USCG, WDFW, OSP, and CDFW enforcement partners. Table 1 summarizes *Effort*, *Actions* and *Results* data for the directed commercial Pacific halibut fishery south of Point Chehalis, Washington (46°53'30" N). Tables 2 and 3 summarize general Magnuson-Stevens Act (MSA) fisheries enforcement that broadly include the two other fishing sectors that catch Pacific halibut: Commercial-Incidental, and Recreational. *Effort* data provides a measure of fisheries-related enforcement presence and capacity. The *Actions* and *Results* sections provide an overview of regulatory compliance and enforcement issues of concern associated with the fishing sectors.

Table 1.







2024 IPHC AREA 2A ENFORCEMENT STATISTICS							
COMMERCIAL - DIRECTED							
	USCG D-13	USCG D-11	NOAA OLE	WDFW	OSP - ODFW	CDFW	
							
EFFORT							CONSOLIDATED EFFORT
AIR PATROLS							
Number of Air Patrols	20	8	2	2			32
Air Patrol Hours	45	32	5	5			87
Air Patrol Personnel Hours			5	5			10
VESSEL PATROLS							
Number of Vessel Patrols	28	7	4	5	25	15	84
Vessel Patrol Hours	487	67	17	31	92	43	737
At-Sea Personnel Hours			33	61	92	91	277
Number of Boardings	8	1	7	12	68	45	141
SHORESIDE PATROLS							
Number of Shoreside Patrols			24	1	30	3	58
Shoreside Personnel Hours			174	1	88	10	273
Number of Contacts			24		66	6	96
OFFICERS/AGENTS/WARDENS							
Number of Assigned Personnel	56	38	9	12	8	9	132
ACTIONS							CONSOLIDATED ACTIONS
Compliance Assistance			2				2
Written Warnings			1		4		5
Referral to OLE				1		*2	3
Criminal Citations					2		2
RESULTS (Violations)							CONSOLIDATED RESULTS
Logbook/Record Keeping					6	2	8
Restricted/Closed Area				1		2	3
Vessel Marking			1				1
Boarding Ladder			1				1
**Seabird Avoidance Gear			1				1
*2 violations for each OLE referral.							
**Groundfish violation that was documented during a combined Directed Halibut/Open Access groundfish trip.							

Table 2.













2024 IPHC AREA 2A ENFORCEMENT STATISTICS							
COMMERCIAL - INCIDENTAL							
	USCG D-13	USCG D-11	NOAA OLE	WDFW	OSP - ODFW	CDFW	
							
EFFORT							CONSOLIDATED EFFORT
AIR PATROLS							
Number of Air Patrols	164	125					289
Air Patrol Hours	361	214					575
Air Patrol Personnel Hours							
VESSEL PATROLS							
Number of Vessel Patrols	275	52				15	342
Vessel Patrol Hours	4,371	972				43	5,386
At-Sea Personnel Hours						91	91
Number of Boardings	24	18				45	87
SHORESIDE PATROLS							
Number of Shoreside Patrols						3	3
Shoreside Personnel Hours						10	10
Number of Contacts						6	6
OFFICERS/AGENTS/WARDENS							
Number of Assigned Personnel	56	38				9	103
ACTIONS							CONSOLIDATED ACTIONS
							None
RESULTS (Violations)							CONSOLIDATED RESULTS
							None

Table 3.

2024 IPHC AREA 2A ENFORCEMENT STATISTICS							
<i>RECREATIONAL</i>							
	USCG D-13	USCG D-11	NOAA OLE	WDFW	OSP - ODFW	CDFW	
							
EFFORT							CONSOLIDATED EFFORT
AIR PATROLS							
Number of Air Patrols	125	86					211
Air Patrol Hours	296	159					455
Air Patrol Personnel Hours							
VESSEL PATROLS							
Number of Vessel Patrols	201	47	7	23	19	15	312
Vessel Patrol Hours	3,116	895	73	124	81	43	4,332
At-Sea Personnel Hours			83	284	81	91	539
Number of Boardings	136	4	15	181	107	45	488
SHORESIDE PATROLS							
Number of Shoreside Patrols			6	56	13	64	139
Shoreside Personnel Hours			12	235	28	139	414
Number of Contacts				990	35	206	1,231
OFFICERS/AGENTS/WARDENS							
Number of Assigned Personnel	56	38	3	7		9	113
ACTIONS							CONSOLIDATED ACTIONS
Written Warnings			8		9		17
Citations				65	29	2	96
Verbal Warnings				15		5	20
RESULTS (Violations)							CONSOLIDATED RESULTS
Permit/License			8	9	10	6	33
Gear Violation				17	1	1	19
Fail to Validate Tag					19		19
Illegal Harvest					1		1
Restricted/Closed Area				4	6		10
State Violations - Halibut Fishery				46			46

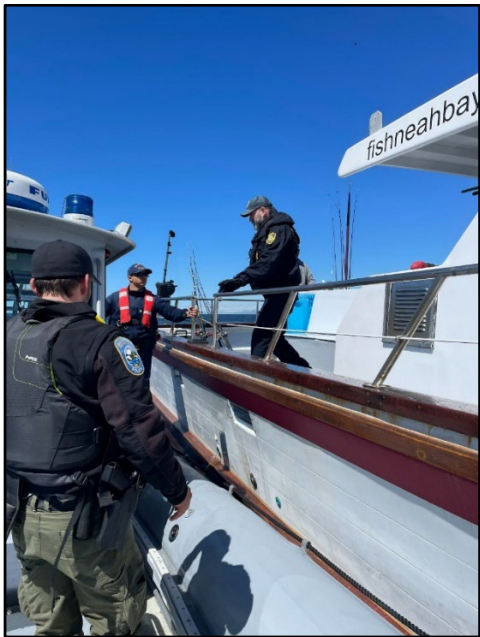


Washington Department of Fish & Wildlife (WDFW) - Police

WDFW Officers conducted many boat patrols out of Neah Bay during the coastal halibut seasons. Neah Bay United States Coast Guard officers and a NOAA Officer accompanied them on these patrols. Over the course of the season several charter boats were boarded and Officers found that IPHC license compliance was 25% early in the season. The NOAA Officer addressed these violations gathering information for follow up. One charter boat contacted had two onboard that did not possess State halibut licenses; another charter boat had one fisherman onboard without a halibut license in possession of a halibut.



Charter boat boarded by USCG, WDFW and NOAA during emphasis patrol.



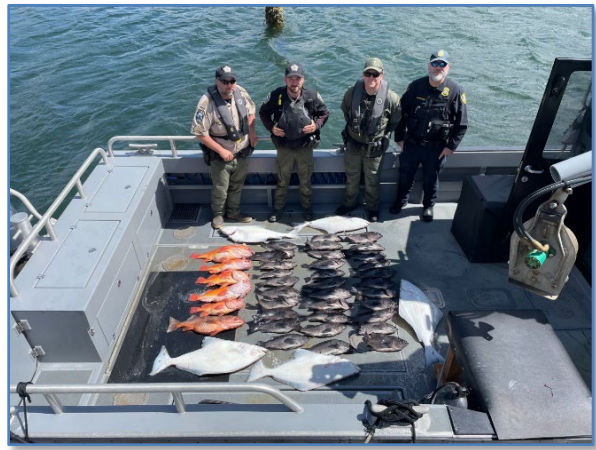
NOAA Officer providing information to a charter captain on how to obtain the required IPHC permit.

During a 3 day emphasis on the North Coast Officers discovered the following violations even though Halibut fishing was relatively slow for most anglers; Closed season/area rockfish possession (7 cites, 5 warnings), Fail to record (3 cites, 1 warning), No halibut CRC (1 cite), Fishing without a license (1 cite), No boat registration 3 (1 cite), and Overlimit. Additionally, multiple warnings were issued for failing to have descending devices onboard vessels while targeting bottom fish.

WDFW Officers and a NOAA Officer conducted a second emphasis on the North Coast performing multiple boat patrols. Some notable contacts are detailed below:

Officers contacted a vessel with tribal registration. Upon contacting the people onboard, the officers found three of the four were not tribal members. The boat was actively fishing three lines in a WDFW bottomfish closure area. The officers discovered five halibut already in their possession (one over the combined state limit). Additionally, the anglers possessed 33 black rockfish (5 over the combined state limit). The state anglers onboard became argumentative, claiming they caught their halibut and rockfish in an area open to fishing before moving out into the closure area, where the tribal member could fish under tribal regulations. The WDFW Sergeant spoke with the Tribal Chief and advised him of the situation. The Chief agreed with the violations observed by the officers and advised that the tribal member onboard should have known what they were doing was illegal. All fish were seized. Violations included, Participating in treaty fishery x3, Overlimit halibut x3, Overlimit rockfish x3, Fishing closed waters x3.

WDFW Officers boarded a vessel to inspect some bottomfish. Immediately, the Officer observed two yelloweye rockfish in the boat's fish hold. The Officer removed the rockfish and laid them on the deck, then asked the anglers what species of fish they thought they were. The anglers abruptly stated, "yelloweyes." The Officer was caught off guard by this as most of the time yelloweyes are retained in cases of mistaken fish id. He advised that yelloweye retention has been closed for many years along the entire Washington coast. In addition to closed season yelloweye possession, the anglers were found to be fishing with three hooks on each line. The anglers received multiple citations for the violations.



WDFW and OLE joint emphasis patrol and confiscated illegal catch.



130 pound halibut landed in Sekiu.

A WDFW Officer observed a vessel coming into dock. The Officer observed one of the men whisper to another, as the boat touched the dock. That man got off quick and said he was going to the bathroom. Sergeant Cilk quickly asked if they had halibut onboard and got an answer of “yes, 3”. When asked if the man’s license and catch card was onboard, he decided he didn’t need to go to the bathroom so bad. One of the other men was then caught trying to hide while he completed a catch card entry. As that issue was being addressed the man that had to go to the bathroom admitted he did not have a license and was going to run up to buy one really quick. Sergeant Cilk addressed the violations and pointed out to the group that they did not actually have 3 halibut as they thought but two halibut and a Sole.

Commercial Directed Fishery

WDFW Officers conducted multiple boat and dockside patrols for the directed commercial halibut fishery. They also patrolled by air with the United States Coast Guard. Officers found good compliance with the fishery. During one patrol however, while patrolling the boundary, one vessel was found to be laying longline gear inside the 100-fathom RCA. The skipper was contacted and the violation was addressed. Along with the closed area violation, the captain was found to not be in possession of his commercial license or crewmember licenses. Investigation later determined that the skipper had purchased the licenses but had not yet received them in the mail. The gear was successfully pulled and the case was referred to NOAA enforcement.



Oregon State Police (OSP) - Fish & Wildlife Division

RECREATIONAL

A Sergeant and two Troopers from the Marine Fisheries Team conducted a Guardian patrol. During the patrol, Troopers contacted sport halibut and salmon anglers. Citations were issued for Angling with barbed hooks and Fail to immediately validate harvest card. One charter vessel was contacted with several anglers fishing with barbed hooks. The captain was cited for Aiding in a Fish/Wildlife Offense; Angling Prohibited Method.

Members of the Marine Fisheries Team conducted a 3-day south coast Guardian patrol. During that patrol, Troopers targeted sport halibut, salmon, groundfish and commercial crab. During the patrol Troopers made the following enforcement contacts out of the ports of Winchester Bay, Charleston, Bandon and Port Orford. Citations and warnings were issued for the following:

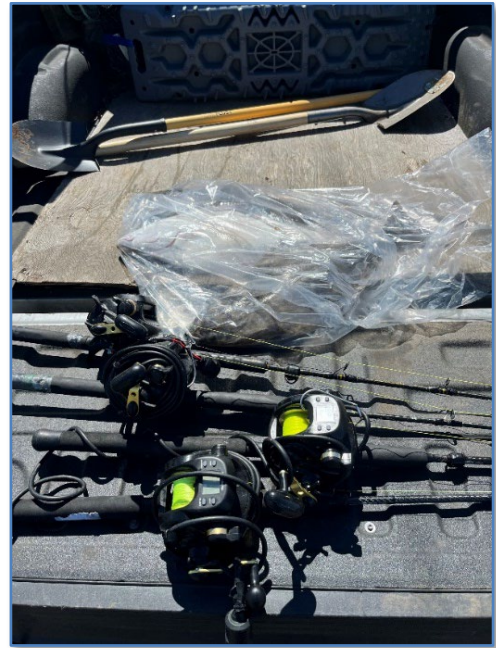
- Angling Unlawful Method; Barbed Hooks
- Unlawful Use of 2 Rods
- Aiding in Wildlife Offense – Unlawful Method Barbed Hooks to Licensed Guide
- Fail to Immediately Validate
- No Valid License in Possession – ELS log in issues
- False Application
- Possession of Undersized Chinook

Troopers contacted salmon anglers inside Stonewall Banks YRCA with halibut onboard. It was determined the anglers had not validated the halibut on their tags. The two anglers were both cited for Fail to Immediately Validate Tag. The Troopers contacted a second sport boat with halibut onboard. The anglers on the second boat also had not validated the halibut on their tags and were cited for Fail to Immediately Validate Tag.



Fish and Wildlife Troopers patrolled the Newport area targeting sport Halibut fisherman. The compliance rate was less than 25%. Troopers issued 10 citations for Fail to Validate Tag, 4 citations for Angling Prohibited Area-Stonewall Banks YRCA, 1 citation for No Angling Tag, 1 citation for No Electronic Tag in Possession, 1 citation for Aiding in a Wildlife Offense – Unlawful Take of Lingcod – Prohibited Area. One lingcod was seized and donated to charity.

In June, Troopers contacted a boat with three anglers as it returned to port in Charleston. The anglers denied catching any fish, but one of them had tagged a Pacific Halibut. The subject who tagged the halibut said he didn't realize the fish was thrown back by the boat captain and the group again denied having any fish on board. A consent search of the fish hold under a rubber mat revealed nine Pacific Halibut, only one of which was tagged. The group was interviewed, and they all stated they hadn't paid attention to how many halibut they caught, and thought they were legal. Each member of the party was cited for Exceeding Daily Limit of Halibut and for Fail to Immediately Validate Harvest Tag and were warned for Failure to Allow Inspection of Catch. Three Pacific Halibut were seized and donated. The four rods and reels used during the trip were seized as evidence.



In June, Troopers and the MFT Sergeant conducted an ocean patrol out of Newport on the Guardian. The patrol was focused on Halibut retention and 17 citations were issued.

Troopers conducted an ocean patrol from Pacific City. Numerous halibut and rockfish anglers were contacted; and warnings and citations were issued for Continue to Angle After Retaining Daily Limit, No Harvest Card – Halibut, and various electronic licensing issues.



Troopers conducted a boat patrol on the Pacific Ocean out of Garibaldi. Ocean conditions and the weather were favorable resulting in a high number of boats on the water. Throughout the course of the day the Troopers wrote 23 citations and issued 8 warnings for a variety of angling offenses, primarily barbed hooks and fail to immediately validate. Multiple subjects were found with untagged halibut and harvest observations were made on their accounts along with citations issued.



COMMERCIAL

A Senior Trooper from the Marine Fisheries Team assisted NOAA Officers with a commercial FV halibut offload. It was found the vessel did not have a current Halibut permit; the logbook was not completed and there was a faulty VMS system. NOAA took lead on the case.

A Senior Trooper was conducting inspections of commercial halibut offloads in Port Orford and found a fish dealer buying fish who had not renewed his dealer's license for 2024. After looking into the case, it was determined the dealer had sent in their application to ODFW, paid all landing fees and bond, but was never charged or issued the license. The dealer was warned and reminded they are not officially licensed until they receive the actual paper copy of their license.

A Senior Trooper contacted a commercial captain and limited fish seller in Winchester Bay after a lengthy investigation stemming from 3 separate commercial fisheries in 2023. The captain was criminally cited for:

- Albacore Tuna season – No Wholesalers Fish Dealer License, Fail to Maintain Proper Fish Dealer Records and Fail to Submit Fish Ticket within the Required Time Frame.
- Directed halibut season - Fail to Submit Fish Tickets and Fail to Maintain Dealer Records.





California Department of Fish & Wildlife (CDFW) – Law Enforcement Division

Nine CDFW officers were involved in halibut season patrols patrolling from the Gualala River north, working the ports of Pt. Arena, Albion, Noyo Harbor, Shelter Cove, Eureka, Trinidad, and Crescent City.

One hundred thirty-nine halibut dockside hours were worked during Northern California patrols. Patrols covered the major ports in Mendocino, Humboldt and Del Norte Counties, and approximately 5 sport boat launch ramps. CDFW Wildlife Officers patrolled, contacted, and regularly checked 9 party boats targeting halibut.

Ninety-one hours of at-sea personnel hours were worked in support of halibut.

Forty-three hours of near-shore vessel hours were used in support of halibut.

Fifteen commercial contacts and 309 recreational contacts were made enforcing halibut regulations. 324 total halibut contacts were made this year enforcing halibut regulations.

Five warnings were issued for not possessing a fishing license.

Two recreational citations were issued. One citation was issued for no fishing license and one citation was issued for a multiple pole violation.

Two Commercial Pacific Halibut cases were referred to NOAA. The first case was referred to NOAA for take of commercial Pacific Halibut in the non-trawl RCA and failure to maintain logbooks. The second case referred to NOAA was for take of commercial Pacific Halibut in non-trawl RCA and failure to maintain logbooks.

During the 2024 Pacific Halibut season the patrols by CDFW Wildlife Officers covered the major ports in Mendocino, Humboldt, and Del Norte Counties, and approximately 5 sport boat launch ramps. CDFW patrolled, contacted, and regularly checked 9 party boats targeting halibut between Shelter Cove and Crescent City. Offshore halibut patrols were made in combination with salmon and rockfish patrols.

No halibut regulation enforcement challenges or concerns for next year were reported.



CDFW Wardens directed commercial Pacific Halibut season boardings out of Eureka, CA.



CDFW Warden issuing a citation for a recreational gear violation in the Eureka area.



NOAA Fisheries Office of Law Enforcement - West Coast Division

NOAA Fisheries' Office of Law Enforcement (OLE) West Coast Division (WCD) worked collaboratively with USCG Districts 11 and 13 (D-11/D-13) and State Joint Enforcement Agreement (JEA) partners to monitor and enforce West Coast Pacific halibut fishery activities pursuant to MSA, IPHC and NMFS West Coast regulations and management measures for the 2024 Area 2A Pacific halibut commercial directed, incidental sablefish, salmon troll, recreational, and charter fisheries. As a recurring annual enforcement priority, OLE - WCD conducted and participated in air, at-sea, and shorebased patrols, vessel boardings, and monitoring of fish landings with USCG D-11 and D-13 teams, and WDFW, OSP, and CDFW officers to ensure compliance with Area 2A Pacific halibut fishery regulations.

Operation Flatfish Frenzy

Operation Flatfish Frenzy is conducted annually by OLE in support of the IPHC Area 2A directed commercial Pacific halibut fishery. Enforcement efforts for the five 2024 directed commercial Pacific halibut fishing periods ("openers") focused on promoting compliance with opener start and stop times, area restrictions, catch and offload record-keeping, and size retention and discard requirements.

Enforcement emphases of this annual operation also included monitoring commercial bottom longline vessels that retain both groundfish and Pacific halibut for compliance with seabird bycatch minimization measures; and inspecting recreational charter boats targeting Pacific halibut to verify a valid NOAA-issued permit was obtained at least 15 days prior to their first fishing trip, in addition to applicable State licensing requirements. Vessels fishing under a directed commercial license are prohibited from fishing recreationally for Pacific halibut in the same IPHC Regulatory Area.

Between early-April and late-September, NOAA OLE Enforcement Officers (EOs) participated in air, shorebased, and at-sea patrols utilizing available USCG, State, and OLE assets to achieve Area 2A Pacific halibut fishery enforcement objectives. Air operations were conducted aboard USCG fixed-wing and rotary aircraft; primarily on the first and last days of openers, to observe start and stop times, and Seabird Avoidance Gear (SBAG) deployment. Additional mid-week air operations were planned to monitor compliance with fishery regulations as schedules and weather permitted. Docksides patrols were conducted at the start of the openers, and the day after closing, with an EO assigned temporary duty in Newport, OR to expand enforcement presence in the Central Oregon Coast region. OLE Patrol Vessel F2706 was deployed from Ilwaco, WA to conduct at-sea patrols and boardings off the Northern Oregon and Southern Washington coasts as sea conditions and EO availability allowed. Shorebased patrols focused on offload monitoring, permit verification, and logbook completion.

Recreational and Charter Halibut Fishery

On April 7th, EOs conducted an at sea recreational halibut patrol in the San Juan Island area on Patrol Vessel F2708 along with USCG Cutter *Sea Lion*. The team boarded four recreational boats participating in the recreational halibut fishery. One vessel safety violation was documented by the USCG.



OLE Patrol Vessel F2708 alongside USCG Cutter Sea Lion

On May 2nd through the 4th, and again on June 13th through the 16th, emphasis patrols focused on recreational charter vessels were conducted by OLE and WDFW officers. These joint effort at-sea patrols departed Neah Bay and monitored waters of the Strait of Juan de Fuca out to the Washington Yelloweye Rockfish Conservation Area (YRCA). Docksideside patrols were conducted in Seiku, WA. Approximately 10 recreational charter vessels were contacted during the at-sea and docksideside patrols; 8 of which did not have a NOAA-issued recreational charter halibut permit. All subjects found to be in violation of recreational charter halibut permit requirements were issued written warnings.

Directed Commercial Halibut Fishery

Fishing Period #1 (June 25-27)

Enforcement activities for the first opener included 2 vessel patrols utilizing 24 personnel hours, 2 helicopter patrols utilizing 5 personnel hours, and 13 docksideside patrols utilizing 103 personnel hours. Violations detected during these patrols included 1 boarding gear, 1 vessel marking, 1 gear marking, and 1 logbook.

Docksideside monitoring was conducted the following day on June 28th. An EO was assigned patrol operations in the Coos Bay, OR, area; and another EO assigned daily docksideside patrols and offload monitoring in Newport, OR. Two EOs also conducted at-sea patrols off the mouth of the Columbia River utilizing Patrol Vessel (PV) F2706 to execute boardings, and monitor start and stop times, seabird avoidance gear deployment, careful release practice, and general regulatory compliance. Previously planned EO operations aboard USCG cutters were not accomplished due to unforeseen cutter scheduling conflicts. Planned participation of an Alameda-based EO aboard USCG C-27 air patrols was also canceled due to aircraft operations relocating from Sacramento, CA to Portland, OR.



OLE EO participating in USCG helicopter patrol

Fishing Period #2 (July 9-11)

Enforcement activities consisted of 1 vessel patrol utilizing 5 personnel hours, and 9 dockside patrols utilizing 64 personnel hours. No violations were observed during this opener. Additional dockside monitoring was carried out on July 12th.

An EO was assigned patrol operations in the Coos Bay, OR, area; and another assigned daily dockside patrols and offload monitoring in Newport, OR. EOs also conducted at-sea patrols utilizing PV F2706 to execute at-sea boardings off the mouth of the Columbia River, and monitor start and stop times, seabird avoidance gear deployment, careful release practice, and compliance with other regulations. Previously planned EO operations aboard USCG cutters were not accomplished due to unforeseen cutter scheduling conflicts. Planned participation of an Alameda CA-based EO aboard USCG C-27 air patrols was also canceled due to aircraft operations relocating from Sacramento, CA to Portland, OR.

Fishing Period #3 (August 6-8)

Enforcement activities consisted of 1 officer patrol utilizing 2 personnel hours. There were no vessel or aircraft patrols conducted for this opener. Dockside monitoring in the area of Coos Bay, OR was carried out on August 9th. One halibut overage violation was identified.



OLE EO conducting at-sea boarding.

Fishing Period #4 August 27-29)

This opener coincided with required West Coast Division-wide training resulting in limited NOAA OLE availability. Enforcement presence for this halibut opener therefore relied on USCG and State JEA partner patrols covering Area 2A.

Fishing Period #5 (September 24-26)

Enforcement activities consisted of 1 officer patrol utilizing 5 hours. No violations were identified. EOs returned to their normal areas of operation to monitor and conduct dockside boardings as needed.