WASHINGTON DEPARTMENT OF FISH AND WILDLIFE REPORT ON PACIFIC HALIBUT CATCH SHARING PLAN CHANGES

The Washington Department of Fish and Wildlife (WDFW) can appreciate the difficult position that the California Department of Fish and Wildlife (CDFW) has been in for the past seven years. From a conservation perspective, having a significant amount of halibut being caught in their recreational fishery without sufficient quota to cover their catch must be concerning; on the other hand, trying to gain a foothold with a new fishery to access quota for a resource that is fully subscribed, is challenging at best. While we have not necessarily been in this situation in recent years, we would hope that, if we were to find ourselves in a similar predicament, CDFW and the Pacific Fishery Management Council as a whole would be open to considering reallocation despite the painful discussions that may entail.

In considering a reallocation of halibut among the non-tribal fisheries in Area 2A, we believe there are at least four separate issues to address: 1) what an appropriate allocation amount for the California recreational fishery may be; 2) where additional quota for the California recreational fishery would come from; 3) what season structure would be reasonable to achieve, but not greatly exceed, the new allocation; and 4) what structure changes need to be made in the Catch Sharing Plan to provide management flexibility.

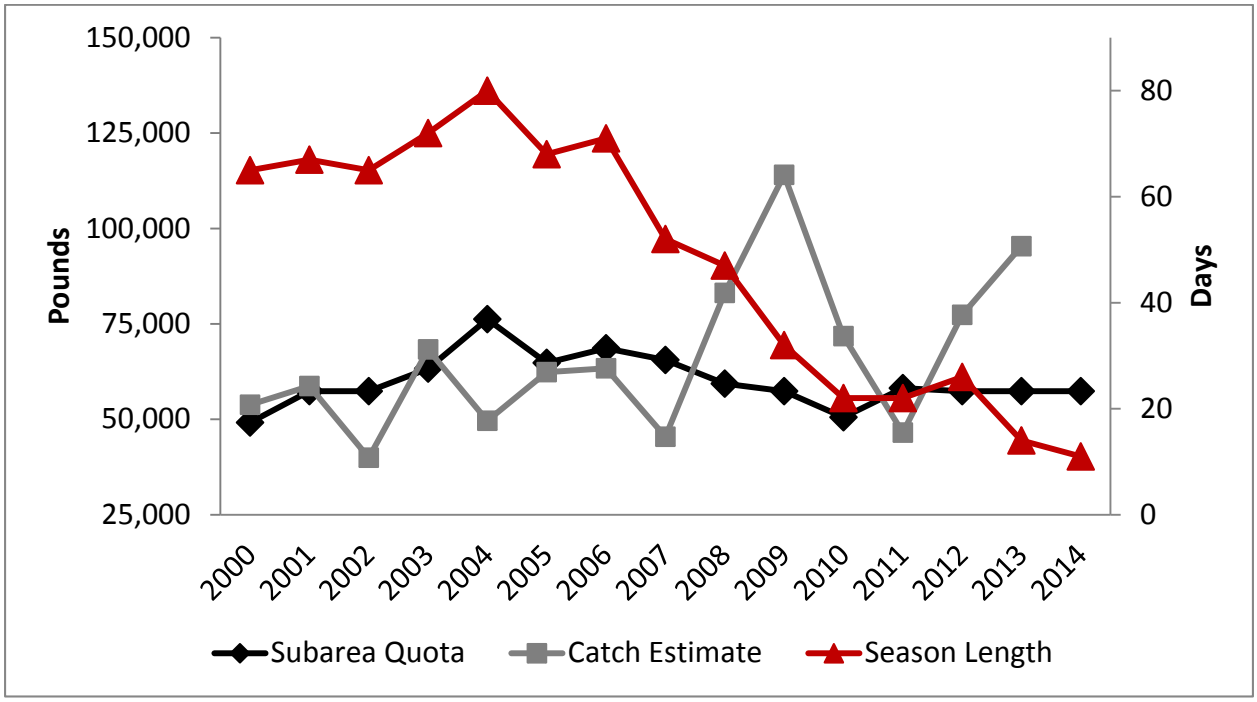
On the allocation amount for the California recreational fishery, we believe there are many factors to consider, including conservation of the stock, availability, and fairness. On conservation, while there have been Pacific halibut in the northern California area in recent years, this area has only been included in the annual survey for two years—2013 and 2014—and while there may be more halibut in the area than are actually harvested, we do not have any idea how those halibut contribute to the coastwide stock or the portion of the stock in Area 2A.

We have been fortunate in that, up until now, the overall Area 2A harvest has been relatively close to the total allowable catch (TAC) despite the catch overages that have occurred in some fisheries, as other fisheries have underachieved their quotas. It is our understanding that is one of the reasons that the International Pacific Halibut Commission (IPHC) has approved a TAC for Area 2A that has been higher than what the survey results and traditional apportionment method would provide. However, our overall management performance may not be viewed as favorably by IPHC in the future if the 2A harvest levels exceed the TAC, which will likely happen in 2014.

With regard to the California recreational fishery season dates, we understand the difficulties associated with inseason quota-monitoring on a “real-time” basis, and support continuing to manage the fishery under a fixed season. At the September meeting, there was a question about how we manage WDFW’s recreational halibut fishery in Puget Sound and whether that has been

successful. Figure 1 demonstrates the performance of the Puget Sound halibut fishery. While catch has exceeded the quota—by a considerable amount in a couple of years—we believe it is important to note how the season length was subsequently reduced in response.

Figure 1. Puget Sound recreational halibut fishery quotas, catches, and seasons, 2000-2014.



To be clear, we are not saying that CDFW needs to have a perfect season structure upfront, but that we would expect them to recommend management action for subsequent seasons in response to their fishery's performance. As we have witnessed in Washington's recreational halibut fisheries, predicting effort preseason is challenging as there are other factors to consider, including the availability of other recreational fishing opportunities, tides, and weather; however, by reducing the season length at the outset, we have at least placed a limit on the amount of halibut that could reasonably be caught in that timeframe.

As we mentioned in September, we thought it would be helpful to use a method similar to how we set our recreational halibut seasons for Puget Sound, which has evolved over the years through trial and error, as a reasonable approach to estimate a practical season length for the California recreational halibut fishery under various allocation alternatives. We have done a couple of preliminary calculations as examples for the Council; a detailed description of our methodology and results are in Attachment 1 of this report.

In brief, using CDFW reported catches and average weights, the estimated season length of the California recreational halibut fishery is substantially shorter than the status quo. The status quo season is five months long, seven days per week, for a total of about 150 days. If one assumes

that a significant portion of those days has less effort (e.g., weekdays early in the week and perhaps the fall months), we would guess there were approximately 65 “meaningful” fishing days with relatively high effort in the status quo season. For comparison, if the 2A TAC remained the same in 2015 (960,000 pounds) and the California allocation were increased to four percent of the non-treaty share (to be just under 25,000 pounds)—using the same assumptions for “meaningful” fishing days—the California recreational halibut fishery would likely achieve its quota in less than two weeks.

Finally, WDFW agrees with the Groundfish Advisory Subpanel that reallocation alternatives need to be considered in conjunction with the ability to take management action to ensure quotas are not exceeded. While CDFW suggested requesting their Fish and Wildlife Commission delegate the authority to their Director to take action via emergency rule to close the recreational halibut fishery upon quota attainment, they were also realistic regarding the likelihood of that happening and of it being exercised inseason if their quota remains lower than they feel they deserve. Therefore, we believe the National Marine Fisheries Service (NMFS) should have the flexibility to set seasons and take inseason action for the California recreational halibut fishery. This regulatory mechanism is in place for all other halibut fisheries coastwide and NMFS can implement its actions quickly by updating its hotline.

APPLICATION OF THE METHODOLOGY USED TO CALCULATE THE PUGET SOUND RECREATIONAL HALIBUT FISHERY SEASON LENGTH TO THE CALIFORNIA RECREATIONAL HALIBUT FISHERY

In support of the California Department of Fish and Wildlife (CDFW) continuing to manage its recreational halibut fishery under a fixed season, rather than a real-time quota-managed fishery, in September 2014, the Washington Department of Fish and Wildlife (WDFW) suggested consideration of our Puget Sound season-setting methodology as a reasonable approach. The following is a description of our data sources and assumptions, methodology, and resulting season lengths for the California recreational halibut fishery with the 2A status quo TAC level under two different allocation alternatives.

Data Sources

WDFW used the harvest data from 2008-2013 reported by CDFW in the South of Humbug Pacific Halibut Workgroup Preliminary Management Measure Analyses (Agenda Item D.2.b, Workgroup Report, September 2013) and 2014 catch information (through July) as reported by CDFW at the September 2014 Council meeting. Catches for September and October 2013 were used as a proxy to project catches for those same months in 2014.

Average weight was estimated to be about 20 pounds, based on the CDFW reported weight in RecFIN and anecdotal information from California charter fishing operations and anglers.

Methods

WDFW's methodology to calculate the season length for the Puget Sound recreational halibut fishery is:

1. Divide subarea quota by average weight to approximate the number of fish available

2. Review past seasons to calculate the average number of fish caught per day in each of the last five years

3. Divide the approximate number of fish available by the highest catch per day for the past five years to estimate the number of days available for the next season

As mentioned in our report, the Puget Sound season length calculation has evolved over time. It has become increasingly conservative in the past few years as other recreational fishing opportunities have been severely constrained or closed.

While effort may increase in the California recreational halibut fishery in the future, particularly if the season is compressed, we thought it may be premature to apply such a stringent method from the outset. Therefore, for this calculation, we adjusted our method slightly to use a three-

year average catch per day based on the number of fishing days from 2012-2014, rather than the highest catch per day for the past five years.

Results

We applied the revised method described above to estimate the season length to two allocation alternatives (3 and 4) using the status quo 2A TAC of 960,000 pounds. The following are the preliminary results of those calculations.

Average Weight: 20 pounds
3-Year Average Catch per Day: 195 fish

Alternative 3
California Sport Quota: 18,720 pounds

Dividing the quota by the average weight produces an estimated total of 936 fish in the subarea quota. Dividing the total fish by the average catch per day results in an estimated season length of 4.8 days.

Alternative 4
California Sport Quota: 24,960 pounds

Dividing the quota by the average weight produces an estimated total of 1,248 fish in the subarea quota. Dividing the total fish by the average catch per day results in an estimated season length of 6.4 days.

Conclusions

As a final step—again, assuming there are approximately three to four "meaningful" fishing days per week —the following are examples of potential seasons for these alternatives. They are meant as examples only; they are not actual season proposals.

Alternative 3 Example Season: May 1-8, 2015

Alternative 4 Example Season: May 1-14, 2015

As mentioned in the report, there are many factors to consider when setting seasons, such as other scheduled fishing opportunities and community events. As such, CDFW may want to consider changing its traditional opening date of May 1st to something else and reducing the days of the week to stretch the season across as many weeks as possible.