

OREGON DEPARTMENT OF FISH AND WILDLIFE REPORT ON SCOPING PACIFIC HALIBUT CATCH SHARING PLAN ALLOCATION CHANGES

This report contains the Oregon Department of Fish and Wildlife (ODFW) comments and concerns regarding changes to the Pacific halibut Catch Sharing Plan (CSP) allocations.

Table 1 shows the overall Area 2 A Total Allowable Catch (TAC) and the number of days open annually for all of the recreational areas/fisheries and the directed commercial fishery for 2000-2016 (some 2016 data is not yet available as fisheries are still occurring). This table shows that since 2000 almost all of the recreational Pacific halibut fisheries have seen significant reductions in the number of days open, with some very popular fisheries being open for 5 or fewer days in recent years. Additionally, the directed commercial fishery has not had more than 2 10-hour openings since 2008. All Pacific halibut fisheries have been and are experiencing reductions in the amount of time open.

Background

Beginning in 2013 the Pacific Fishery Management Council (Council) began working on a process to address increasing catches in what at the time was called the South of Humbug Mt. Subarea. The Council created two ad hoc workgroups, one focused on data, the other on policy, with representatives from all three West Coast state agencies, the International Pacific Halibut Commission (IPHC), and the National Marine Fisheries Service (NMFS).

As noted in the Situation Summary, at that time the South of Humbug Mt Subarea (which included Humbug Mt. to the OR/CA border in Oregon) allocation (approximately one percent of the non-tribal allocation) was shifted to the new California area. Within Oregon, approximately two percent of the Oregon recreational allocation was then shifted to the newly created Southern Oregon Subarea, reducing the allocation to the Columbia River and Central Oregon Coast Subareas. This action reduced the Oregon recreational allocation from 31.7 percent of the non-tribal allocation to 30.7 percent.

During the fall 2014 annual Pacific halibut CSP process, one percent of the non-tribal allocation from each of the Washington recreational, Oregon recreational, and commercial allocations was shifted to the California recreational allocation. This increased the California recreational allocation to four percent of the Area 2A non-tribal allocation. It also reduced the Oregon recreational allocation down to 29.7 percent of the non-tribal allocation. At the end of that process, the Council indicated that that would conclude the South of Humbug Mt. allocation process (ad hoc workgroups were disbanded) and that this should remain in place for several years to see how the fisheries proceeded. Each state was then responsible for managing their fisheries to stay within their allocations.

Table 1. Number of days open to Pacific halibut fishing by sector and year, with the Area 2A total allowable catch (TAC).

Year	Puget Sound East	Puget Sound West	North. WA	South. WA Primary	South. WA Nearshore	Columbia River All-Depth	Central OR Spring All-Depth	Central OR Summer All-Depth	Central OR Nearshore	South of Humbug Mt. ^{a, b}	Southern OR	Calif.	Directed Comm. Fishery	2A TAC (lbs.)
2000			36	20		90	6		153	153			3	830,000
2001			29	19		45	9		153	153			6	1,140,000
2002			23	52		25	8	8	153	153			3	1,310,000
2003			20	41		152	9	22	184	153			4	1,310,000
2004			14	45		86	16	26	184	184			4	1,480,000
2005			9	30		59	21	39	170	184			4	1,330,000
2006	70	72	7	17	-	42	21	15	144	184			3	1,380,000
2007	68	71	14	7	-	36	24	21	139	184			4	1,340,000
2008	64	59	13	13	-	39	24	23	184	184			4	1,220,000
2009	43	43	6	11	143	31	18	3	109	184			2	950,000
2010	30	22	7	7	151	49	14	2	79	184			1	810,000
2011	24	23	8	7	90	48	15	2	147	184			2	910,000
2012	15	30	7	5	33	60	17	4	83	184			2	989,000
2013	12	8	4	5	-	66	15	2	21	184			2	990,000
2014	11	8	4	5	-	87	12	4	123 ^c		184 ^d	184 ^a	2	960,000
2015	11	8	3	4	77	19	12	14	123 ^{c, d}		184	57	2	970,000
2016 ^e	8	8	5	4	N/A	19	14	N/A	N/A		N/A	N/A	N/A	1,140,000

^a not managed inseason; open dates set pre-season

^b included Oregon south of Humbug Mountain and California

^c fishery start date moved from May 1 to July 1

^d quota shifted inseason from another Oregon fishery to keep open longer

^e data for seasons that have attained their allocations and are closed for the remainder of 2016

N/A = fishery ongoing.; total days open not yet available

Current Proposal

After less than one full year under the new allocations and inseason management, a proposal by California recreational representatives on the Groundfish Advisory Subpanel (GAP) to move an additional one percent from each of the Washington and Oregon recreational allocations to the California recreational allocation was included in the GAP September 2015 Pacific halibut CSP report ([Agenda Item I.1.a., Supplemental GAP Report](#)). This proposal would result in Oregon recreational allocation being shifted to the California recreational sector for a third time in the last four years, resulting in a cumulative reduction of the Oregon recreational allocation by 9 percent; from 31.7 percent to 28.7 percent of the Area 2A non-tribal allocation.

Impacts to the Oregon Recreational Fisheries

Table 2 shows the impacts to the Oregon recreational fishery, by subarea and season, of the reductions that occurred during the past processes described above, as well as of the proposed further reduction. To determine the implications for each subarea and fishery, the percentage of the non-tribal allocation was applied to the 2016 Area 2A TAC, then the 2016 subarea and fishery allocation percentages as specified in the CSP were applied. This was done to show the difference created by the changes to the Oregon recreational allocation.

Table 2. Changes to the overall Oregon recreational allocations and fishery allocations and estimated range of open days lost relative to pre-2014 fisheries.

		pre-2014	2014	2015-2016	Sept 2015 GAP Proposal	Difference between pre-2014 and Sept 2015 GAP proposal	Estimated reduction in # of days open
OR Rec percentage of the 2A non-tribal allocation		31.7%	30.7%	29.7%	28.7%	-3.0%	
2A TAC	2016 % of OR Rec Allocation	1,140,000					
Non-Tribal Allocation		741,000					
Total OR Rec		234,897	227,487	220,077	212,667	-22,230	
Columbia River (OR contribution only)	2.3%	5,403	5,232	5,062	4,891	-511	2-4 days
Central OR Coast	93.79%	220,310	213,360	206,410	199,460	-20,850	
<i>Spring All-Depth</i>	63%	138,795	134,417	130,038	125,660	-13,135	1-2 days
<i>Summer All-Depth</i>	25%	55,077	53,340	51,603	49,865	-5,212	0.5 -1 days
<i>Nearshore</i>	12%	26,437	25,603	24,769	23,935	-2,502	10-14 days
Southern OR	3.91%	9,184	8,895	8,605	8,315	-869	10-21 days

As an example, the Central Oregon Coast Subarea, which receives 93.79 percent of the Oregon recreational allocation based on the 2016 CSP, would see a reduction in its allocation of 6,950 pounds, resulting in a net loss from the combined allocation changes (already occurred plus proposed) to this subarea of 20,850 pounds.

The Southern Oregon Subarea and Oregon’s contribution to the Columbia River Subarea would see decreases of similar proportions. This net reduction would reduce the number of days each fishery is open by 1-14 days annually, which equates to an 11-16 percent reduction in the number of days available for halibut fishing opportunities off of Oregon.

Socioeconomic Impacts

These decreases in the Oregon recreational allocation would have socioeconomic impacts to Oregon, specifically small, fishing-dependent coastal communities. The estimates below are based on the reduction from the pre-2014 Oregon recreational allocation (31.7 percent of the non-tribal allocation) to the proposed 2017 allocation (28.7 percent of the non-tribal allocation).

Reduction in Angler Trips

ODFW estimated the lost angler trips (Table 3) from the allocation shifting that has already occurred and for the proposed shifting by using the methods described in a December 2014 report to the IPHC¹. This methodology projected that for every 100,000 pounds of Area 2A TAC that was reduced, 1,490 angler trips would be lost. Back-calculating what the equivalent TAC reduction would be based on a combined reduction to the Oregon recreational allocation of 22,230 pounds results in an equivalent TAC reduction of 119,164 pounds.

Table 3. Reduction in Angler Trips

	Reduction (lbs)		OR rec percentage of the non-tribal allocation		Non-Tribal percentage of the TAC		Hypothetical TAC reduction (lbs)	Lost Angler Trips
Combined	22,230	/	28.7%	/	65.0%	=	119,164	1,776
Previous Shifting	14,890	/	28.7%	/	65.0%	=	79,818	1,189
Proposed Shifting	7,340	/	28.7%	/	65.0%	=	39,346	586

Applying 1,490 angler trips per 100,000 pounds of TAC, equates to 1,776 combined angler trips lost annually. Allocation shifting that has already occurred accounts for 1,189 lost angler trips. The proposed allocation shifting would be an additional 586 lost angler trips.

Economic Value per Oregon Recreational Halibut Trip

Economists commonly use angler expenditures (the money spent on trip-related expenses, e.g., fuel, lodging, tackle), to assess the economic contribution of recreational angler trips. It should be noted that angler expenditures are a conservative measure of value, as there are additional sources of value related to these trips such as indirect trip costs (e.g., boat purchases), secondary

¹<http://www.dfw.state.or.us/MRP/finfish/halibut/docs/management/EconomicHalibutReport2014.pdf>

spending (e.g., “money multipliers”). This report does not go into those additional sources of value; however they could be examined depending on the Council’s range of alternatives.

For this analysis, the most recent expenditure data for Oregon anglers from the National Marine Fisheries Service (NMFS) nationwide marine angler expenditure survey by Lovell et al. (2013) were used. To account for differences in expenditures among charter (\$381) and private anglers (\$120), a weighted average (\$172) was used based on proportional contribution of each to total halibut effort (i.e., 80 percent private trips; 20 percent charter trips).

$\text{\$172 (weighted avg. per trip)} = \text{\$381 per charter trip} \times 0.2 \text{ proportion charter trips} + \text{\$120 per private trip} \times 0.8 \text{ proportion private trips}$

Applying \$172 (weighted avg. per trip) to the estimated 1,176 lost angler trips results in a loss of \$305,393 to Oregon coast economies annually. Of that loss, \$204,556 is from the allocation shifts that have already occurred, with \$100,836 from the proposed additional reduction.

Conclusion

ODFW does not support considering another revision of the Pacific halibut allocations so soon after the most recent change. With only one full year of fishing since the last allocation change, there has not been sufficient time to evaluate the results. We suggest beginning a review of the Pacific halibut allocations in 2019; five years after the most recent revisions were implemented. Over that five year period, the Council will have a more robust time series to evaluate how the state/area fisheries have proceeded following the 2013 and 2014 reallocation processes, can review new survey and any other relevant information that becomes available from the International Pacific Halibut Commission or other sources, and will be better able to determine whether further allocation changes may be warranted.

If the Council chooses to pursue increasing the allocation to the California recreational sector, ODFW believes that the current range of alternatives is too narrow. Based on Council guidance in September to broaden the scope, and the cumulative impacts to the Oregon recreational sector from the proposed action plus actions already completed, additional alternatives of where to get that allocation from should be explored, with appropriate engagement from potentially affected sectors.