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**REGULATORY PROPOSAL 2019**  
**IPHC Regulatory Area 2A Quota Proposal**

**SUBMITTED BY:**  
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COMMERCIAL FISHERMAN  
UNITED STATES OF AMERICA  
26 OCTOBER 2018

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**IPHC Regulatory Area(s) that may be affected: 2A**  
**Fishery Sector(s): Commercial**

**EXPLANATORY MEMORANDUM**

**Newport Oregon longliners**

This is a proposal for the future management of the pacific halibut fishery in area 2-A below point Chehalis Wa. This is in response to the IPHC's request for a change from the current 10 hour derby fishery.

Our proposal would produce an individual quota system. In all other IQ programs that we are aware of, qualifying poundage was obtained on an equal playing field where each fisher had unrestricted access to qualifying pounds. Since 1991 fishers in 2-A have operated entirely under a length based trip limit system where larger vessels had larger trip limits.

Our IQ proposal has two qualifying criteria, with the first favoring the larger vessels and the second designed to even the playing field and favor the smaller vessels. All vessels will be awarded quota points earned in both qualifying criteria. The sum of points earned in both criteria will determine IQ poundage.

**Initial requirement**

To be included in the pool of fishers eligible for the individual quota system a fisher would need at least one delivery of halibut in two of the last three years.

**Qualifying window period**

The qualifying period for our IQ proposal would be the most recent 10 years of the halibut fishery in 2-A. While most of us had higher catches of halibut prior to this time, we felt that recent participation and poundage levels would best represent current dependence and investment in the fishery.

### *Qualifier #1 – total pounds landed*

Use the total pounds caught throughout the entire window period by each qualified vessel.

This criteria obviously favors the larger vessels with larger limits. We felt that criteria number 2 favors the smaller vessels and should even things out.

#### Explanation of qualifier# 1

Add total pounds caught in the entire window period by each qualified vessel. Determine the top amount produced by any one vessel. The top vessel's production becomes the possible 100 % and the top vessel receives 100 quota points for his total.

Every other eligible vessel is compared to the top producing vessel and their production is expressed as a percentage of the number one producer.

Then award each eligible fisher one quota point for each percentage point they earned when compared to the top producer.

#### Example

For ease of example let's say that the top producing vessel had 100,000 lbs total in the entire window period.

Then let's say that vessel X has 63,000 lbs. in the entire window period which is 63% of the top vessel's 100,000 lbs. Vessel X would receive 63 quota points towards his IQ.

Let's also say that Vessel Y caught 91,000 lbs. in the window period. Vessel Y would receive 91 quota points.

We felt that while larger boats had larger trip limits than smaller boats, they also often did not stay and fish smaller later openings, giving the smaller boats a little chance to catch up some.

### *Qualifier #2 – percentage of available pounds caught*

Take total pounds caught in Qualifier# 1 for each eligible boat and then compare each boats production with what was possible for each boat's size designation throughout the entire window period if the vessel fished every opening available. Determine what percentage of what was possible that each boat caught.

We felt that it was easier for a boat to catch 5,000 lbs. in a ten hour opening than it is to catch 10,000 lbs. in that same ten hour period. Therefore Qualifier# 2 should favor smaller boats with smaller trip limits. Also it is a fact that many larger boats skipped the later, smaller openings, and many smaller boats stayed and fished these openings. This in many cases would produce high percentage catch rates for smaller boats and 0% catch rates for the larger boats that didn't fish later openings. We felt that the advantage for smaller vessels in qualifier#2 should pretty well even out the large boat advantage in qualifier# 1.

## Explanation of qualifier# 2

If the top boat in this qualifier caught, say 80% of the possible fish that were available in their size category counting all openings for the entire window period, then the top boats percentage would become the 100% standard that all other qualifiers would be compared to and the top boat would receive 100 quota points for his effort history.

Let's say in this case that boat X caught 60% of the fish available in his size category. 60% is three quarters of the 80% that the top producer earned in his size category. Three quarters is 75%, so boat X would receive 75 quota points.

Let's say that boat Y only fished the first opening and then went offshore tuna fishing most years. If boat Y caught 40% of the total available fish in his size category then that is half of the 80% caught by the top boat in the #2 qualifier. Half is 50% so boat Y would receive 50 quota points.

Both the #1 & #2 qualifier categories give more benefit to boats that fished as many openings as possible over the entire window period with good average production for their size category.

After all points for all qualified vessels have been awarded, regulators would add up the total number of points earned by all eligible fishers combined. Then regulators would divide the total allowable catch pounds by the total number of points earned, producing a number of pounds of halibut per quota point. Total quota points would only need to be calculated once during initial allocation. The pounds allocated per point would go up and down with changes to the TAC.

There also needs to be discussion about how much fish any one boat should be allowed to catch as quota points become marketable. Alaska has a vessel cap and we feel that there should be one here as well. We feel that a vessel cap of 5% of the TAC would be appropriate for area 2-A.

We feel that a "professional longliner" is one who pulls ground line with hooks on it more than two days a year. We also feel that already being at sea pulling ground line with an occasional halibut on it while targeting black cod, is a good efficient way to produce halibut with minimal negative impact to the stock. Each of us signed on this proposal also fish fixed gear black cod permits.

We feel that a halibut IQ program in area 2-A below point Chehalis would provide a more consistent supply of fresh halibut to local restaurants and fish markets, and would result in higher ex-vessel prices for the halibut produced. An IQ would allow fishers to produce their halibut when it fits their schedule, in favorable weather, reducing gear conflicts and the sacrifice of other fishing opportunities.

We feel there should be a moratorium on 2-A halibut licenses with a control date publicly announced. If other fishers realize that change is coming in the 2-A halibut fishery there could be a flood of new interest of fishers not wanting to be excluded. This

fishery has a very small quota on the directed commercial side and additional fishing pressure would further dilute an already greatly reduced fishing opportunity in whatever halibut management is adopted in the future.

Thank you for considering our proposal for future management of area 2-A Directed commercial Halibut fishing below point Chehalis Wa.

Signed by Newport Oregon Longliners.

Michael Pettis (F/V Challenge – 37 years, F/V Jaka-B – 25 years)

Doug Morrison (F/V Tempo – 32 years)

Robert Aue (F/V Winter Hawk – 38 years)

Mark Newell (F/V Silver Quest – 14 years)

Tony Pettis (F/V Heidi Sue – 20 years)

#### **SUGGESTED REGULATORY LANGUAGE**