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February 1, 2018 North Pacific Fishery Management Council 605 West 4th Avenue, Suite 306 Anchorage, AK 99501 Re Agenda: C-6 IFQ Committee Dear Chairman Hull and Council members: Alaska is facing a growing problem of fisheries access. The 'graying of the fleet' and loss of access to commercial fisheries, particularly in rural communities, threatens the healthy succession of fishing as an economic and cultural mainstay in Alaska's communities. The 20-year review of the halibut and sablefish IFQ program brings these issues - and the need to address them - again to the fore. The geographic and demographic shifts in access to Alaska fisheries are the result of several factors. Our recent study of fishing communities in Bristol Bay and the Kodiak Archipelago identifies how privatizing fisheries access has created large financial and other barriers to entry into commercial fisheries, and has especially impacted small rural fishing communities. Our research findings are consistent with others across the globe that conclude young people, small-scale fishermen, rural and Indigenous communities need improved access to commercial fisheries where access has been privatized and pathways to owner-operator careers have been restricted. Our project team recently released the attached report: "Turning the Tide: How can Alaska address the 'graying of the fleet' and loss of rural fisheries access?" This report provides recommendations and reviews policy responses and applied solutions that other fishing regions and nations have developed to address barriers to entry. A few of our key recommendations include:

- Explore supplemental forms of access to commercial fishing that are not market-based to facilitate entry and provide diversification options.
- Establish youth permits or student licenses and mentorship or apprenticeship programs to provide young people with exposure to and experience in fishing and a pathway to ownership.
- Develop mechanisms to protect and diversify community-based fishing access, including provisions to protect local access.

This report, and our larger study (fishermen.alaska.edu), may be of interest to the 20-year IFQ review as the IFQ Committee works toward potential solutions to addressing access challenges in the halibut and sablefish IFQ fisheries. Our team would welcome an opportunity to present project findings in more detail at the April meeting, during B reports or at any time the Council deems appropriate.

Sincerely, Dr. Courtney Carothers, clcarothers@alaska.edu, University of Alaska Fairbanks

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Re.C4 medical lease provisions and ifq committee proposals

Dear chairman Hull and council members,

My name is Joshua Moore I currently own and operate the F/V Castaway. I Started longlining at a young age in 1982 with my father . In 1995 bought my first longliner at the age of 21. For the last 22 years I have made the majority of my living longlining under the IFQ program. Although I currently own quota I was not an original recipient of quota.

I am writing in regards to proposals to sunset hired skipper program and tighten restrictions on medical lease provisions.

The IFQ program is a lot like a boat . I ask that we do not sink the whole ship because of some minor issues.

In regards to medical lease provision, please keep in mind that the increase in activity or transfers is partially due to more restrictions on hired skipper provisions in program. Before hired skipper was less restrictive so medicals where handled there. Also 75% of transfers in last 10 years were used less than 3 times . Out of 2450 quota share holders there are 2 that have used this program all 10 years. While the proposed changes seem to focus on these two individuals who are allegedly abusing the program, can we think of the people who have fought multiple medical issues for more than 2 years and have returned to the fishery. I have personally seen this happen.

Sometimes in the politics of this fishery we tend to focus on a very few people . In this case a handful or two and we forget the effect on everyone else. Changes to this provision could be very damaging to new entrants in fishery. I've seen many times medical issues take time to be resolved. As I get older I realize illnesses and injuries can happen and when you have the type of investment or loans it takes to participate in this fishery its nice to have a safety net.

We currently lease quota to charter industry and are starting process to start young fisherman permit and ifq banks. Please keep in mind that the hired skipper IFQs are accomplishing the same thing for much of the fleet. How many crewmen were loaned money based on income from hired skipper pounds? We keep doing far reaching sudden changes ,banks may lose faith in the process, making it harder for new entrants to access quota.

I ask that we hold off on making any changes to the program until we have data on how it will affect the hundreds of jobs that we are playing with. This program is funded and been around over two decades, the other proposed pools are in developmental stage.

In 2013 I believe, we sunseted part of the hired skipper provision. This was in proposal supposed to accomplish lower quota prices and availability. If you look at IFQ prices it did not work.

Until there is good data on the affect these proposal's will have on the fishery I ask that you change nothing with the program. Since we are attempting to regulate a group well over 60

with medical issues ,maybe the problem will solve its self with out burdening the new generation with burdensome regulations. This may give time to address pressing issues like dragger bycatch, and management of stocks so we have something left to fight over in future.

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