

United Fishermen's Marketing Association Inc.

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May 14, 2020

Mr. Simon Kinneen, Chair
North Pacific Fishery Management Council

Re: B1 Request to modify IFQ Transfer provisions of the Halibut and Sablefish IFQ Program

Dear Chairman Kinneen and Members of the Council,

The United Fishermen's Marketing Association, Inc. (UFMA) includes harvesters who participate in the hook-and-line fishery for pacific halibut and the hook-and-line and pot fisheries for sablefish that occur in the Gulf of Alaska (GOA) and Bering Sea/Aleutian Islands (BSAI).

UFMA members are significantly impacted, as are all halibut and sablefish harvesters, processors, communities, management and regulatory agencies, distribution chain, consumers and others by the anticipated and unanticipated, but nevertheless, substantial, effects of the coronavirus pandemic on the 2020 halibut and sablefish fisheries in the GOA and BSAI.

The effects of the coronavirus pandemic on the 2020 GOA and BSAI halibut and sablefish fisheries will disrupt, and in many cases collide significantly with, the established regulatory, economic, social, cultural and theoretical objectives for these fisheries.

We believe that a compelling objective for the remainder of the 2020 GOA and BSAI halibut and sablefish fisheries is to take every precaution, and minimize every unnecessary regulatory requirement, for the purpose of protecting the health and safety of all those harvesters, processors and associated workers, families, businesses, community members and others who will be in unavoidable contact with the activity surrounding the harvesting, processing and other handling of the 2020 halibut and sablefish fisheries.

An equally compelling objective is to ensure, to the most possible and maximum extent, that the 2020 GOA and BSAI harvest quotas are harvested. This means putting aside, minimizing, modifying and suspending several of the well-developed and reasoned parameters of quota share and vessel ownership, leasing restrictions, vessel caps, usage caps, etc. that are built into the management regime for the GOA and BSAI halibut and sablefish fisheries.

While some may not agree, the beneficiaries of these objectives include Alaskan coastal communities, small and large vessel harvesters, holders of small and large halibut and sablefish shares, crewmembers, harvesting and processing workers, harvesting and processing efficiencies, and other human, operational and financial objectives. Strict adherence to and conformance with some of the current regulatory objectives should be suspended to provide the most safety-related, social and economic benefits and outcomes when addressing the complexities of the current coronavirus pandemic.

The more that the halibut and sablefish fisheries can be released from the strict conformity with the vessel caps, leasing provisions, usage caps, etc., the more likely it will be that the underlying infrastructure of the halibut and sablefish fisheries will survive, maximum revenue will be created, and a reasonable-case-scenario of the distribution of the benefits of such revenues will be realized.

Sincerely,

A handwritten signature in black ink, reading "Jeffrey R. Stephan". The signature is written in a cursive style with a prominent "J" and "S".

Jeffrey R. Stephan