

North Pacific Fishery Management Council  
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**Re: B-1 Modify Transfer Provisions**

May 13, 2020

Dear Chairman Kinneen and Members of the Council

I am concerned about the potential for increased risk of exposure to the Corona Virus, from those traveling from elsewhere, into coastal Alaska. Having said that, the IFQ program already has mechanisms in place to accommodate the health needs of quota share owners.

One of the original objectives of the IFQ Program is to “Assure that those directly involved in the fishery benefit from the IFQ Program by assuring that these two fisheries are dominated by owner/operator operations.”

We have seen the dynamic of the fishery shift away from that objective. It is highlighted by the request from those quota owners who are not otherwise invested or engaged in the fishery.

If you decide to take an emergency action, please do not let this become yet another permanent advantage for those who are privileged to own quota. Take this opportunity use this natural experiment to collect current information from those quota owners that benefit from the action. Relevant data could include the following:

- Are they an original recipient?
- Are they normally eligible to utilize the medical transfer provision?
- Do they own a vessel?
- If so are they less than 50% or more than 50% owner?
- Do they live in the same town the quota is harvested out of or delivered into?

I would like to remind the Council that they have recently taken steps to institute a maximum number of years the medical transfer provision can be used for any medical reason. This is in response to the increased use of that provision since the implementation of the rule that original recipients cannot utilize a hire master for quota obtained after December 1, 2014.

Sincerely,

Natasha M. Hayden, P.E.  
F/V Clyde, LLC