

April 27, 2020

Chairman Simon Kinneen
North Pacific Fishery Management Council
605 West 4th Street, Suite 306
Anchorage, AK 99501-2252

Re: Special Meeting May 15, 2020 – Covid-19 Response – Medical Transfers and Vessel CAPs

Dear Chairman Kinneen:

The members of the Fishing Vessel Owners' Association (FVOA) and Deep Sea Fishermen's Union (DSFU) appreciate the special meeting of the North Pacific Fishery Management Council. We have two requests from the Council concerning regulatory restrictions that affect the Halibut Sablefish I.F.Q. program.

All of the members of FVOA and DSFU participate in the IFQ fishing off Alaska, both in the Bering Sea and the Gulf of Alaska. FVOA represents 75 family fishing boat operations and 20 independent quota shareholders, both first and second generations. Many DSFU represented crew and skippers are second generation quota shareholders.

Our two requests of the Council are as follows:

1. We request that the COVID-19 emergency health modification to the existing medical transfer provision for the remainder of the 2020 season and would apply to all persons regardless of age or known underlying medical condition. We believe this would be an emergency action request from the Council.

Many of our younger first and second generation quota shareholders crew are on vessels domiciled in Alaskan coastal towns or have specific times during the season to meet up with a vessel that is already in Alaska, during the season. These younger fit crew are being put at an unnecessary risk. While the majority of our vessel owner members and their crew live in Washington State, many come from all over the United States. We have second generation quota shareholders from Florida, Arizona, California, and Oregon trying to coordinate with vessels in Alaska.

While NMFS/NOAA is providing a COVID-19 extension for the quota shareholders older than 60 or with medical ailments, younger fit crews are still caught up in very expensive plans of quarantine that may include 14 days in a motel before getting on their vessel. The crews still have to expose themselves to the risks of travel in confined spaces, always with the fear of being exposed to someone with COVID-19.

Our crews that live in Alaska do not always have the same quarantine and risk concerns that our crew and quota shareholders have that travel from Oregon and Washington or other states.

Our organizations understand the interest that second generation crews be on a vessel when fishing their quota, however, the current national emergency covering all fifty of the United States concerning COVID-19 should be reason enough to provide a one season waiver for the

rest of 2020 to all regardless of age or underlying condition. Currently, we have one of our vessels, where a crewman was diagnosed with COVID-19. It has set the vessel and crew back three weeks

The Council's support to allow the COVID 19 emergency to be used by any person regardless of age or known underlying condition would be greatly appreciated for the remainder of the 2020 season and would do much to ensure the health of the public and coastal Alaska.

1. Apart from the modification to the existing medical transfer provision and to further enhance health and safety and a maximized harvest, we request that the current vessel CAP for halibut areas 3 and 4 be waived for the remainder of the 2020 fishing season along with the Bering Sea sablefish district and sablefish districts in the Gulf of Alaska known as the Western Gulf, Central Gulf, and West Yakutat.

While our fleet and many other fleets are already on the grounds, many other vessels have yet to begin their harvest due to health concerns and market factors. Because of the closure of the restaurant trade in North America and other countries such as Japan, the price for halibut and sablefish has dropped significantly since 2019. This is resulting in a significant decrease in gross income per fishing trip for our vessels and crews. This is going to result in a low percentage of the harvestable halibut and sablefish being caught this year. By liberating the vessel CAP, the vessels that are operating may be utilized more efficiently to harvest quota that will otherwise go unfished due to health concerns. The vessels already on the grounds will be able to acquire sufficient quota to make a profit for the vessels and the crews and justify harvesting most of the Council and IPHC approved TAC's. The current vessel CAP will likely make it difficult to operate a vessel profitably to keep a crew and harvest the TAC's. Increasing the CAP for vessels willing to continue fishing will provide an avenue for quota shareholders who otherwise would opt to stay off the grounds to have their quota harvested

In summary, our two organizations believe these two emergency requests could greatly benefit the IFQ halibut and sablefish crews and vessel owners during the remainder of 2020. These actions will increase the profit structure for vessels and crews during this medical crises and allow a greater amount of commerce and harvest to take place. We did not suggest a change in the area specific CAP's of S.E. Alaska for either sablefish or halibut, only a change in CAPs for areas westward of this geographical area.

Sincerely,



Jim Johnson, Executive Director

Deep Sea Fishermen Union of the Pacific



Robert D. Alverson, Manager

Fishing Vessel Owners' Association

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