

North pacific fishery management council  
Dan hull chair  
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[Npfc.comments@noaa.gov](mailto:Npfc.comments@noaa.gov)  
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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