

**United Fishermen's Marketing Association, Inc.**  
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January 28, 2014

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council

**Re: C-1; (1) Gulf of Alaska P. cod pot sector participation; (2) Need for Council action to adopt a Control Date for the CGOA P. cod pot sector.**

Dear Chairman Olson,

The United Fishermen's Marketing Association, Inc. (UFMA) includes harvesters who participate in the Gulf of Alaska (GOA) Pacific cod (P. cod) pot fishery. UFMA members and other Central GOA (CGOA) and Western GOA (WGOA) P. cod pot harvesters are impacted by Council action of June and October, 2012 (1) that resulted in the implementation of Control Dates for the groundfish trawl fisheries in the CGOA (December 26, 2012, 77 FR 75966), and the WGOA (March 21, 2013, 78 FR 17340), and (2) that initiated the ongoing development of a framework of alternatives that are intended to implement a catch share program in the GOA groundfish trawl fisheries.

Modifications of fishing behavior and participation in the CGOA P. cod pot fishery has occurred, and will continue to occur, as a result of these Council actions. The GOA groundfish trawl fishery benefits from Council action that advances the implementation of a management regime and rationalized fishery that limits competition and provides advances in economic efficiency, stability, greater profitability and other benefits. In stark contrast, the CGOA P. cod pot fishery is left open to speculative expectations and participation, increased competition, a ripe environment for economic inefficiency, instability and lower profits, and the public notice that it is one of the last valuable fisheries within the Council jurisdiction that has been left open so that fishing history can still be earned toward future qualification in a rationalization program that will ultimately be determined for this fishery.

Since June, 2012, it appears that some newer participants have entered the CGOA P. cod pot fishery for what seem to be speculative reasons. Moreover, traditional participants in the CGOA P. cod fishery who, prior to June, 2012, exhibited what could be described as rational and traditional fishing behavior are since then more and more compelled to also engage in speculative behavior. Both traditional and newer participants seem to be engaging in uncustomary, risky and abstract behavior by racing for fish, fishing for history, subsidizing participation by investing profits and capital from other rationalized fisheries that would otherwise not be invested in the P. cod pot fishery, and otherwise making operational decisions with the hope of gaining speculative history in this fishery in response to the operational and economic imbalance and inequality in which the CGOA P. cod pot fishery has been placed. The playing field has been destabilized for those participants in the P. cod pot fishery who wish to continue to participate in this fishery for the right reasons. Local coastal community residents who have been long-time participants in the CGOA P. cod pot fishery, who support local industries and businesses, and who largely employ local resident

crew, many with dependent families, are those who are most vulnerable, and most likely to be negatively impacted by and suffer the most loss and dislocation that results from the fertile ground that now exists for economically inefficient investment, speculation and modification of effort in the CGOA P. cod pot fishery.

We request that the Council take action at this meeting to schedule a specific agenda item at your April meeting to adopt a Control Date for the CGOA P. cod pot sector to address the speculative entry and race for fish that is certain to cause impact to, and put at serious risk, the economic viability of the CGOA P. cod pot sector that results from the allocation-based management program that the Council is advancing on behalf of the GOA groundfish trawl sector. We further request that the Council expand the scope of the current discussion paper (i.e., "Discussion Paper; Gulf of Alaska Pacific Cod Pot Sector Preliminary Data Review; February 2014") to outline the requisite considerations that provide the basis for the adoption of a Control Date for the CGOA P. cod pot sector at your April meeting.

Council action is necessary to adopt a Control Date for the CGOA P. cod pot sector (1) to discourage ongoing and continuing speculative entry; (2) to avoid the economic, social and cultural deterioration of this sector, and of the GOA coastal communities, residents and businesses that depend on this sector; (3) to ensure that the CGOA P. cod pot fishery is conservatively managed, and does not exceed established biological thresholds; (4) to provide for needed improvements in the operational efficiencies of this sector; (5) to reduce incentives to fish during unsafe conditions, (6) to reduce incentives to fish for speculative reasons; (7) to dampen the effects of speculative entry and a derby-style race for fish in this sector by vessels and entities that act in response to the Control Date and anticipated allocation of fishing privileges in the GOA groundfish trawl fisheries; (8) to support the continued direct and indirect participation of coastal communities that are dependent on the CGOA P. cod pot fleet; and (9) to avoid the imposition of a dissimilar and regulatory-and-policy-induced disadvantageous competitive market environment for the CGOA P. cod pot sector as compared to the GOA groundfish trawl sector.

We believe reasonable judgment that is consistent with the wise and thoughtful development of fishery management systems suggests the necessity of conducting a comprehensive analysis and consideration of the impacts and risks to the CGOA P. cod pot fleet that result from the Council action to advance two Control Dates and an allocation-based management program in the GOA groundfish trawl fisheries. Rather than only acting to exclusively address the GOA groundfish trawl sector, absent any consideration of impacts to other entities and sectors that are integrally tied to, and dependent upon, the GOA groundfish fishery, the Council has a responsibility to examine the benefits of advancing a Control Date for the CGOA P. cod pot sector.

Thank you for your consideration of our comments with respect to this matter.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey R. Stephan". The signature is written in a cursive, flowing style.

Jeffrey R. Stephan