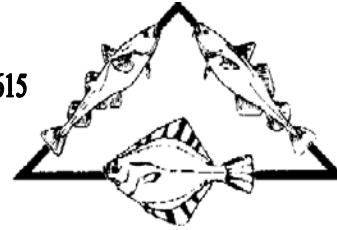


Groundfish Data Bank

Alaska

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Julie Bonney, Executive Director jbonney@gci.net
Katy McGauley, Fisheries Biologist agdb@gci.net



May 30, 2017

Dan Hull, Chairman
NPFMC
605 W. 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Re: C-1 2016 Observer Program Annual report

Dear Chairman Hull,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes the majority of both the Kodiak shorebased processors and the trawl catcher vessels based in Kodiak. The Kodiak trawl industry is assigned to the full observer coverage category for the Central Gulf of Alaska (CGOA) Rockfish Program but is in the partial observer coverage sector for the GOA limited access pollock, Pacific cod and flatfish fisheries. These comments are directed towards the partial coverage category within the North Pacific Observer program and the 2016 Annual Report.

The 2016 Observer Program Annual Report for the partial coverage sector suggests that there was no temporal or spatial bias across any of the gear strata and that trip metrics across gear types suggest that there was some evidence of an observer effect for both the hook and line and trawl gear strata. However, the document notes that, “*while an observer effect was present, the magnitude of such biases was small*” (page 9).

The report also raises concerns about dockside monitoring for the GOA pollock fisheries (page 8) and suggests that there is observer bias in the *GOA pollock fisheries* due to impacts of tendering activity for the port of King Cove. Recall that observers are not deployed by port, but by random sample of the GOA trawl gear type as a whole. Also as a reminder, in the GOA, for pollock offloads that are observed at sea, a vessel observer does a census count of every salmon in the delivery at the processing plant and also collects genetic information for each of these censused salmon. For vessels that deliver to tenders, observer protocols are different. The salmon bycatch rate for the trip is determined by those salmon that are in the observer’s at-sea sample (extrapolated from the sample to the haul to the trip and to the unobserved sector of the fleet) not a census count. Genetics are only collected for those salmon that are in the observer’s sample.

It is important to note that no tendering is allowed east of 157 degrees longitude (Kodiak side of area 620 and all of area 630 and 640) for pollock. There was virtually no tendering activity in the CGOA pollock fisheries (area 620 and area 630) in 2016, thus the observer bias suggested in the Annual Report “*for the GOA pollock fisheries*” did not exist in the CGOA pollock fishery, but potentially only in the WGOA pollock fishery. The Kodiak pollock industry is concerned that we are being swept up in an observer bias issue for tendering that does not exist in our region with the potential that future solutions to address the bias may very well affect our pollock fisheries.

In light of the above concern, NMFS suggested some long-term changes to consider for dockside monitoring sampling of pollock deliveries:

1. Establishing an alternative program for obtaining genetic samples
2. 100% observer coverage on trawl vessels delivering to tenders
3. Plant monitoring of offloads, including tender offloads, combined with EM for compliance monitoring purposes and full (or maximized) retention of all catch

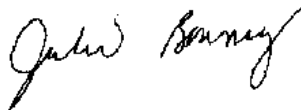
These proposed solutions are focused on solving problems for tendering issues in the Western Gulf of Alaska (WGOA) pollock fishery but could have profound impacts on the CGOA pollock fishery as well since monitoring is designed by gear type for the partial coverage sector. Both number one (alternative program for obtaining genetics) and three (plant monitoring / EM) would impact Kodiak trawl industry participants since it would change the Kodiak pollock dockside monitoring as well. Item number two is problematic on many fronts – high costs either to the partial coverage sector if funded through fee collections or to individual trawl vessels that tender if a pay as you go fee system is adopted. In any case, proposed solution number two does not address the ability of vessels to alternate deliveries between tenders and shore plants nor the difference in salmon monitoring (census versus sampling) for the two delivery methods.

The members of AGDB believe that the 2016 identified dockside monitoring problem needs to be clarified and further analyzed. Based on additional analysis, decisions should be made about monitoring changes necessary to meet monitoring objectives; and a more robust vetting process needs to occur for possible solutions that weighs the impacts to all GOA trawl pollock participants. Possible solution should be designed to balance monitoring objectives, practicability for fishery participants and costs, and focus on approaches that work within the partial coverage system. The Kodiak trawl industry is willing to engage in this discussion since any change may affect our fisheries as well. A subgroup of the Observer Advisory Committee (OAC) that participates in partial coverage issues has already indicated they are willing to work on addressing future low coverage levels, as directed by the Council's April 2017 motion. As the tender issue is clarified, we believe the Council could either task the OAC with developing potential solutions, or create a focus group to also tackle the potential dockside monitoring issue, which should include CGOA and WGOA trawl participants.

Lastly, from page 7, *“of the 7,143 trips logged, 283 of the total logged trips were cancelled by users (4.0%). However, the user cancellation rate for trips that were selected to be observed was much higher (19.6%), and ranged from 15.8% for Trawl gear to 25.3% for Pot gear”*. Recall that users cannot cancel observed trips – only the observer provider (AIS) can cancel observed trips and only for valid reasons. Perhaps AIS could provide a detailed report as to why these observed trips were cancelled, putting to rest the perceived implication that skippers are cancelling observed trips to avoid being observed which we believe is not the case.

Thanks for the opportunity to comment.

Sincerely,



Julie Bonney
Executive Director
Alaska Groundfish Data Bank, Inc

Dan Hull, Chair
North Pacific Fisheries Management Council

Agenda Item C-1, Observer Annual Report and OAC Report

Chairman Dan Hull and Council Members,

My name is Jody Cook. I am part owner/operator of the 58' "Cape Reliant". A combination fishing vessel, home ported in Petersburg, AK. I have been involved with the Gulf of Alaska trawl fisheries for over 30 years. Currently, I deliver my cod and pollock to Trident Seafoods, in Sand Point.

I am writing in regards to Agenda item C-1, Observer Annual Report and OAC report.

There are two Areas of the Observer program that I would like to address:

1- Separate Tender Delivery Strata,.. and, 2- PSC Sampling

1- Separate Tender Delivery Strata

I testified in April in regards to issues the Western Gulf fleet had encountered with the separated "tender" strata, that was introduced in 2017.

I know that any new program has "bugs" that need to be worked out with time and development. But,.. after a cod A season and a pollock A and B season,.. I feel that this separate tender strata has more than just "bugs", that will keep it from working.

In my April letter I attached a page of scenarios that actually occurred. Situations that lead to changes from tender to plant strata. Changes that led to lost fishing time and increased run time and increased fuel cost. This page of situations was just a few of the many that occurred. ODDS personnel, AIS personnel, and enforcement personnel, will attest to the fact that they were flooded with calls trying to make this new regulation work and/or make sense.

I feel that this separate strata requirement will only cripple the Gulf of Alaska Partial Observer Coverage program. There are so many unpredictable situations that lead to a change of whether a vessel will be delivering to a tender or to a plant. The very nature of fishing depends on the fluid change of circumstances that deal with swimming fish and changing weather. The current "race for fish" we are stuck with, leaves us with the worst case, at delivery. If fishing is good,.. at any time the tender or plant can be plugged. So,.. if we lose the race to the plant or tender,. we often need to change our delivery status at the last hour of our trip.

I ask that council recommend that the separate tender strata requirement be eliminated as soon as possible...

I also suggest that observer coverage be somehow tied to State statistical areas. These areas are documented on each fish ticket and shows where the fishing effort actually occurred. This would give more realistic data,.. I believe. Maybe this already happens but some data suggests otherwise.

I recently saw a table that showed no coverage for the tendered deliveries for King Cove, in the 2016 WG Pollock C/D season. In reality, there was no fishing effort in the King Cove area. And,. some of the King Cove vessels actually got their observers from the port of Sand Point, as this was the area they were fishing in. So,. the way the data was collected did not show them as a King Cove vessel, evidentially.

I think that the main focus should be that all “**areas**” that are being fished, should have observer coverage.

For the King Cove tender fleet, or any other vessels delivering pollock to tenders near Sand Point, maybe there can be some requirements to end a trip if the tender delivery is less than 5 miles from a town that is qualified to begin and end ODDS trips. Or, for the fleet that delivers to tenders in remote areas for an extended time, maybe they need to travel to a qualified port after 5 deliveries, to start a new trip.

Just some suggestions,.. but I do not believe the separate tender strata is a working solution for a positive gain in the observer program.

2 - PSC Sampling, (ie,, Census Count, Electronic Monitoring, Plant Observers)

In the 2017 Cod A season , the Western Gulf trawl fishery was nearly closed early because of a high rate of Chinook salmon by catch. When fishermen were informed of the possible closure, they organized a voluntary stand down. When lagging data was reported and calculated, the numbers of Chinook by catch appeared to be much lower. After the stand down, the season continued and the TAC was caught.

There is concern that with the extrapolated basket sample, that there is just not enough hard data, to support a dependable extrapolated result.. The extrapolated basket sample depends on many samples from many different tows and vessels, to achieve a dependable average, that reflects reality. The WG cod fishery has a relatively low TAC. At the beginning of the season there is often little effort as fishers choose to target pollock or continue to target cod with pots, rather than switch to trawl. So,.. at times there is a very limited amount of vessels trawling. Also, most of the early effort is near Sanak Island where fish are delivered to tenders and trips cannot be ended and calculated until vessels travel to ports that allow this. At these times there is a very small amount of observer samples to calculate. The fewer the samples, the greater the potential margin of error.

100% observer coverage is expensive and with a relatively small TAC, this fishery cannot support 100% observer coverage. Also, the presence of a large number of chinook hatchery fish in the recent few years of by catch, concern fishermen. More closures are imminent under the current “race for fish” structure”. In 2017, we have had one voluntary stand down that worked, with full compliance, and we have had another that did not have full compliance, with a number of larger vessels, down from the Bering Sea, choosing to fish. We cannot depend on co-operation amongst competing fishers with different personal and professional agendas.

The Chinook PSC issue is very sensitive and volatile, in the Gulf Cod fishery,.. The Low cap was set at a time when there was little or no record of how much chinook was being caught by trawlers. One bad observer sample would have prematurely shut down the fishery in the 2017 Western Gulf of Alaska Cod A season. Because of the small fleet and relatively few samples,

and the delay time in getting data processed, it is difficult to maintain a real time number, that reflects reality. Doing a census count on a tow, versus an extrapolated count, removes a huge margin of possible error from the system. On the Cape Reliant, for the Cod A season, in 2017, we usually had 0 salmon in a 3-4 hour tow. Other vessels that tow faster with bigger nets, may have 3, in a tow... So, it is not a significant amount of additional work for the observer.

I propose that special measures are taken to address this situation:

1. **Census Count:** Instead of extrapolated basket samples for cod, use a census count of Chinook salmon for each observed tow. This would provide a hard , real number without adding very much extra effort, or expense. The basket sample could still be used for halibut and age and species composition.
2. **Electronic Monitoring:** Use EM to observe compliance with full retention regulations for chinook salmon. I realize that EM has not been tested on small trawlers in the Gulf, but I propose that this testing is put on a fast track, taking advantage of the pilot programs that have already been completed with long liners and pot vessels. I also realize that this measure does have significant cost. With the councils desire to increase observer coverage in the Gulf of Alaska, I believe that EM will be the most economical solution as it is developed in application and new technology.
3. **Plant Observers** for monitoring catcher vessel and tender offloads: I believe that combined with EM for compliance with full retention measures, plant monitors can facilitate a more complete and comprehensive collection and analysis of PSC.

Electronic Monitoring and Plant Observers would also help hugely in the pollock fishery...

Thankyou for the opportunity for this written testimony...

Jody R Cook
FV Cape Reliant

May 30, 2017

Dan Hull, Chair
North Pacific Fishery Management Council
605 W. 4th Ave. Suite 306
Anchorage, AK 99501

Dear Chairman Hull,

I own and operate a 58' fishing vessel that participates in both the Western Gulf trawl cod and trawl pollock fishery. I would like to address agenda item C1- 2016 Observer Program Annual Report.

First, I disagree with the information in table 3-7. I saw this information too close to when this letter was due, so I cannot refute it with any facts, but I am all but certain there was more than 10% observer coverage in Sand Point pollock trawl fishery and I don't know how they came up with 0% in King Cove. I was there, there were plenty of observers and trips being observed. Again, I don't believe this to be true, but if it were, whose fault was it?

It appears what is causing the lack of bycatch information is the observer coverage for fish that is being delivered to tenders. Tenders are extremely important to the 58 foot fleet based out of Sand Point and King Cove. It allows us to stay close to the fishing grounds and not run long distances to deliver, in sometimes dangerous weather, in small boats. As more Bering Sea and Kodiak boats are fishing in the Western Gulf, tenders help the smaller fleet retain, at least somewhat, of our historical percentage of the quota.

There is a recommendation of 100% observer coverage on tendered fish. I strongly oppose that for two reasons. First, we cannot afford it. Until such time there is more revenue generated in either the cod or pollock fishery, most operators could not absorb the added cost. Second, we do not want another human being, full time, on an already too small of a boat. To be honest, more times than not, the observers are in the way. Let me say, at this point, I have no problem being observed. I encourage the Council to move forward as fast as possible with electronic monitoring. Six years ago, at my own expense and the cooperation of Saltwater Inc., I had a camera and recorder set up on my boat as an experiment to help move the process forward. There was no further funding and the experiment went nowhere.

What I suggest as one possible solution is that observers be allowed to follow the fish from the fishing vessel to the tender. From the very beginning of the observer program I have never understood why observer cannot get on and off a tender? The answer has always been it's a safety issue. Really? We feel comfortable putting an observer on a 58 foot trawler in the Gulf of Alaska in the winter and fall months, but not comfortable having that same observer climbing from the fishing boat to the tender that is anchored in the bay in front of Sand Point? For over forty years I have been climbing off my boat to either a salmon tender or a bottom fish tender, in all months, and I have never had a mishap. I would like to think that some observer, forty years my junior, would be able to manage the same feat. The U.S.

Coast Guard is able to get ten guys from a 25 foot zodiac onto our boat while we are towing out in the ocean in a ten foot swell. Another solution, the tenders all have cranes, and could use the cranes to move the observer from one vessel to the other in a man bucket.

All of these tenders that receive our cod and pollock are also salmon tenders. I am certain they all have sorting tables right after the fish comes out of the pump, no different than the fish being delivered to the shore plant. The observer would get real information, from the exact area from where the fish was caught, in real time. Perhaps someone from N.M.F.S. could travel to Sand Point this next C or D pollock season and get on a tender and watch the operation. I honestly believe whatever safety issues there are, can be addressed.

I would like to remind the Council that, at this time, these are not very profitable fisheries. I would hope that whatever choices you make, you bear in mind the cost to the vessels or the cost to the industry. We are still racing for fish and it's frustrating when you have to comply with cumbersome observer rules and I would hope that you would not make them more cumbersome than they already are. Last fall I had to stay in Akutan and wait for an observer. Fishing was fast enough that we were delivering three trips inside of seventy two hours. You might think "damn the bad luck", but we were trying to make up for a nonexistent salmon season. Two years ago I was selected for seven observed trips in a row. We had to wait at the dock for the salmon bycatch to be sampled. I asked the observer if we could put the bycatch back on board so she could sample while we were running back out. She said she could, but then checked with the supervisor that told her the rules would not allow it. Remember, we're trying to make a living here.

In summary, I believe these problems can all be addressed without extra expense to the industry and not creating a situation that results in making the 58 foot vessel less competitive. I'm hoping the Council will clarify exactly what the monitoring issue is for the Western Gulf trawl sector that needs to be addressed (the Kodiak sector obviously does not have these tendering issues) and spend more time analyzing the issue before coming to a decision. EM or observers on tenders seems like the way to go but only if it's affordable.

Sincerely,

John T. Evich
F/V Karen Evich

5/24/17

To OAC, Bill Tweit, Diana Evans and NPFMC;

I am a partner in two fishing vessels owned and operated out of King Cove, Alaska. I operate one of the vessels, F/V Cape St Elias, for all of the trawl seasons. I also help manage the operations of the F/V Alaskan Lady while it participates in the same fisheries. We are Peter Pan boats selling most of our fish to tenders but also make plant deliveries from time to time. I have been participating in trawl fisheries before the observer program was in place so I am able to have perspective of before and after. I can say with confidence that my strategy and duration of time away from port has not changed with the implementation of the observer program. Contrary to general belief we did stay out and make numerous deliveries to tenders over the course of a season. This is one of the ways we are able to fish opportunistic weather conditions while also helping us compete with larger vessels by staying on the fishing grounds.

As a King Cove fisherman I deliver almost all of my pollock and cod to tenders. I deliver fish from as far east as Mitrofanina (620) to as far west as Unimak Pass (610). Without tender service I would be unable to logistically harvest enough fish to have a successful season because of the fish hold capacity and weather limitations of my size vessel. I definitely believe there is room for improvement as far as an observer program goes and I feel that we need to get beyond the thought that this is a cat and mouse game. We as fishermen will absolutely benefit from the information gathered from observers and need to work with said organizations to reach the common goal. We cannot have a system in place that is derived from a knee jerk reaction to coverage statistics without exhausting all good options. Although I have only been involved in the council process for a relatively short time I have been involved long enough to learn that there is a methodical process to reaching any conclusion. I feel this situation should be no different.

After looking over the observer coverage table from 2016 I saw hard numbers that do not paint a complete picture. I will say that on January 20, 2016 I began my winter trawl season pollock fishing. I logged 3 trips prior to the season and all three we selected for an observer. As I mentioned earlier I am a King Cove boat, I logged my trips to start from Sand Point because I know it is easier to get observers in and out of that port. I also believed I would start fishing in that general area so logistically it was a good idea. I fished the start of the pollock season around numerous Sand Point boats as well as King Cove boats. I delivered 100% of my catch to Peter Pan tenders bound for processing in King Cove. As I completed a trip I would end it in Sand Point because it was the closest port. So the trip started and ended in Sand Point but all the fish was remotely delivered to King Cove. This continued for the entire duration of the 2016 610 Pollock A season because I ended up having 4 observed trips in a row. I mention all of this because I am unsure where this information fits into the table. I would also like to point out that it is unclear as of the goal of the observer coverage percentage. Is it per stat area? Is it per port? Is it per fleet? I fished the referenced pollock season in the same stat area as many observed Sand Point vessels, so if it is per stat area I would fall under the coverage stat for Sand Point but be a King Cove

delivery. I would also like to point out that I was observed many times in 2016 and 100% of my fish were sold to the processing plant in King Cove.

I believe that 100% observer coverage under the current protocol is absolutely unacceptable. There is tremendous cost involved with this that I would not be able to absorb. I know you have heard this said repeatedly but it is very true. I also feel there is no mechanism under the current plan that gives us real time information to aid in the avoidance of PSC. For us to sign on to a plan with such a delay in usable information being circulated is also a nonstarter for me.

Having mentioned my resistance to 100% coverage under status quo I would like to offer my ideas and explanations for other options. EM is something I feel we need to put emphasis on for a number of potential benefits. I feel we can execute a pollock fishery with EM, a plant and or tender observer for genetic sampling and a means of sending the information gathered in a timely manner. As far as cod sampling goes we need to terminate the basket sample and move to a whole haul sample. We could again use EM and make sure all salmon are retained and sampled at the tender or plant.

I would like to close with the fact that we are small fishing operations that rely on the ability to be flexible and opportunistic within a fishing season. While fishing a derby style fishery, and competing with much larger vessels, we cannot be unable to maintain our adaptiveness to in season maneuvering because of politics and red tape. Please recognize that weather and many other factors come into play on a daily basis and we are not always able to keep the schedule with AIS.

Thank you for your time and hearing my thoughts.

Sincerely,

Ben Ley



North Pacific Fisheries Association
P.O. Box 796 · Homer, AK · 99603

To: Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue Suite 306
Anchorage, AK 99510
May 29, 2017

RE: Agenda Item C-1

Chairman Hull and Council Members,

NPFA's members participate in diverse fisheries from a variety of different sized vessels, including the IFQ and pot fisheries. NPFA members have made substantial investments in the observer program itself, and made independent efforts to advance the use of electronic monitoring (EM) as the appropriate monitoring approach for our members. In light of the limited coverage resources and priority management needs, NPFA requests that the Council prioritize observer deployments in PSC limited fisheries and recommend that the Council continue to develop and evaluate strategies to increase coverage levels using alternative service delivery models that will increase low coverage rates in the partial coverage observer program.

After review of the 2017 ADP the six sampling strata, using three gear types (hook-and-line, pot and trawl) for stratification and further subdivides each gear type based on whether the vessels deliver to shoreside processors or to tenders.¹ The recommended deployment allocations reflect a weighting scheme based on total discarded groundfish rather than a priority for monitoring bycatch of PSC species.²

The deployments provide for much lower coverage rates than the previous two years, implicating a concern about whether there is enough coverage of PSC-limited fisheries to generate reliable bycatch estimates.

¹ NMFS. 2016. Draft 2017 Annual Deployment Plan for Observers in the Groundfish and Halibut Fisheries off Alaska. National Oceanic and Atmospheric Administration, 709 West 9th Street. Juneau, AK 99802. October 2016 (hereinafter 2017 Draft ADP). *See* Appx. B at 17.

² *Id.*

The 2017 ADP set coverage rates for PSC-limited trawl fisheries at 18 percent for non-tendered trawl trips and 14 percent for tendered trawl trips – a much lower coverage rate than the 28 percent rate set in the 2016 final ADP.³ In 2015, NMFS observed 24 percent of the trips in the PSC-limited trawl sector.⁴ But the 2017 ADP provides “the lowest total sample size since ... 2013” - a 30.7% decrease from the average number of observer days over the preceding four year period.⁵ Anticipating “low coverage rates for 2017 and beyond.”⁶ The lower coverage rates reflect the loss of additional federal funding for the program so that 2017 deployments rely exclusively on industry fees.⁷

The dependence on industry fees raises questions about whether funding is sufficient to provide for all of the potential management uses for the observer program, making it critical to establish clear priorities for observer day allocations and continue efforts to identify potential cost savings. The 2012 Environmental Assessment for the restructured program projected fee revenues based on older price and harvest data and projected that revenues from the IFQ fisheries would generate \$2.9 million, and provide almost 70 percent of the observer program budget.⁸ Indeed, NMFS anticipated that nearly half the total revenue would come from halibut IFQ landings alone.⁹ Other groundfish fisheries would generate the remaining revenue.¹⁰ NMFS did not expect the non-IFQ fisheries to generate sufficient revenue to pay for their own observer coverage, but rather anticipated that IFQ fisheries would cover the projected shortfall.¹¹ The funding mechanism for the observer program reflected the assumption that industry fees would generate \$4.2 million and fund over 9,000 observer days at a cost \$467 per day.¹² However, the 2017 budget for observer deployments is \$3.9 million, which purchases an estimated 3,505 days of coverage.¹³

³ NMFS. 2015. 2016 Annual Deployment Plan for Observers in the Groundfish and Halibut Fisheries off Alaska. National Oceanic and Atmospheric Administration, 709 West 9th Street. Juneau, AK 99802. October 2016. *See* p. 5.

⁴ NMFS. 2016. North Pacific Groundfish and Halibut Observer Program 2015 Annual Report. National Oceanic and Atmospheric Administration 709 West 9th Street. Juneau, Alaska 99802. May 2015 (hereinafter 2015 Annual Report). *See* p. 75.

⁵ 2017 Draft ADP, Appx. B at 20.

⁶ *Id.*

⁷ *See id.* at 19.

⁸ *See, e.g.* NMFS. 2012. Environmental Analysis/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for Proposed Amendment 86 to the Fishery Management Plan for the Bering Sea/Aleutian Islands and Proposed Amendment 76 to the Fishery Management Plan for the Gulf of Alaska at 99-101, 112.

⁹ *Id.* at 112.

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

¹³ 2017 Draft ADP at 10.

A primary reason for the reduced number of available observer days is that the daily cost of observer coverage under the restructured program increased to \$1,071 per day.¹⁴ Additionally, realized fees have been lower than projected largely because of declines in IFQ harvests.¹⁵ NMFS received \$3.77 million in 2015 and \$3.46 million in 2014.¹⁶ During both of these years, fee revenues from the IFQ fisheries were significantly less than the initial estimate of \$2.9 million – 2015 IFQ revenues were \$2.17 million, and 2014 IFQ revenues were \$1.77 million.¹⁷ 2015 and 2014 revenues from the other groundfish fisheries have slightly exceeded initial projections, but the increase has not been sufficient to offset lost revenues from the IFQ fisheries.¹⁸ The halibut IFQ fishery thus remains the most important source of revenue for the program – providing 35 percent of the revenue in 2015 and 30 percent of the revenue in 2014.¹⁹

Given these limited resources, NPFA requests that the Council continue to encourage NMFS to prioritize observer coverage for PSC-limited fisheries. For example, in 2014, the Council encouraged NMFS to maintain higher coverage rates for all trawl vessels and larger fixed gear vessels “in order to expand coverage on PSC limited fisheries, consistent with past Council recommendations.”²⁰ The Council’s October 10, 2015 motion requested that NMFS evaluate deployment designs that reflected an emphasis on discards for the 2017 ADP.²¹ Council discussion of the motion made clear that the Council’s specific concern with discards pertained to the need to incorporate the bycatch of PSC species such as halibut, crab and Chinook salmon in future allocations of observer coverage.²² This emphasis is even more critical now given the relationship between the financial sustainability of the program and recovery of the halibut resource and sustainability and of Chinook salmon.

However, the “discard optimized” approach in the ADP does not adequately address the Council’s longstanding priority for monitoring PSC-limited fisheries because it weighs all discards equally. Halibut bycatch is not just another groundfish discard – *it is a target species for a major fishery that provides significant revenue for the observer program.*

¹⁴ *See id.* at 5

¹⁵ *See* NMFS. 2015. Supplement to the Environmental Assessment for Restructuring the Program for Observer Procurement and Deployment in the North Pacific. NMFS, Alaska Regional Office, Juneau. May 2015. *See* p. 96.

¹⁶ 2015 Annual Report at 5; NMFS. 2015. North Pacific Groundfish and Halibut Observer Program 2014 Annual Report. National Oceanic and Atmospheric Administration 709 West 9th Street. Juneau, Alaska 99802 (hereinafter 2014 Annual Report). *See* p. 6.

¹⁷ 2015 Annual Report at 20, Table 2-2; 2016 Annual Report at 26, Table 2-2.

¹⁸ *Id.* (showing groundfish revenues slightly exceeding \$1.5 million in 2014 and 2015).

¹⁹ *Id.*

²⁰ NPFMC. 2014. C-2, Observer Program Annual Report Council motion. June 5, 2014.

²¹ NPFMC. 2015. C-6 Observer Annual Deployment Plan Council motion. October 10, 2015.

²² NPFMC Audio File 2015_10_10 at 4:17:58 – 4:19:16.

The Final Rule implementing the restructured observer program makes clear that the Council's role in the ADP process is to "provide NMFS input on *the priority* of particular data collection goals."²³ The EA for the restructured program also anticipated a "*need to prioritize the observer days that are available, given the funding level ... and assign them to the strata that yield the greatest benefit.*"²⁴ NMFS' programmatic guidance for observer programs explains that factors which justify higher coverage levels relative to other management objectives include in-season management of bycatch.²⁵

In light of the reduced budget, NPFA requests that the Council direct NMFS to develop an additional method for determining the optimal allocation of observer deployments based on a weighting scheme that prioritizes coverage of PSC limited species. The weighting scheme should also consider prioritizing coverage on PSC-limited species by bycatch volumes.²⁶

The 2017 ADP suggests that an increase in the observer fund fee would be necessary to maintain the prior four year average of observer day deployments.²⁷ NPFA does not support raising the observer fee until other options have been evaluated.

First, in light of the reduced budget, NPFA requests that the Council consider moving vessels fishing small amounts of IFQ to the no-selection pool. The existing no-selection pool includes jig and IFQ vessels <40 feet based on the rationale that the low levels of catch, small number of trips and logistical difficulties with putting observers on small vessels warranted the exemption from observer coverage.²⁸ Additionally, NMFS does not depend on observer data for in-season management of IFQ fisheries. NMFS previously considered public comments requesting an additional exemption for vessels with low annual landings, and acknowledged that the ADP process could include additional exemptions from observer coverage following an "analysis of specific exclusions from observer coverage on the data necessary to conserve and manage the groundfish and halibut fisheries."²⁹

²³ Groundfish Fisheries of the Exclusive Economic Zone Off Alaska and Pacific Halibut Fisheries; Observer Program. 77 Fed. Reg. 70062, 70069 (November 21, 2012).

²⁴ See *supra* n. 8 at 77 (NMFS 2012 EA).

²⁵ NMFS. 2004. Evaluating Bycatch: a national approach to standardized bycatch monitoring programs. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-F/SPO-66. 108 p. Silver Spring, MD. October 2004. See p. 61.

²⁶ See Williams, G. 2016. Incidental catch and mortality of Pacific halibut 1962-2015. Int. Pac. Halibut Comm. Report of Assessment and Research Activities 2015: pp. 313-348 (indicating that 84% of the Area 3A and 3B halibut bycatch occurs in the groundfish trawl sector).

²⁷ 2017 Draft ADP at 20.

²⁸ *Id.* at 8-9; 70 Fed. Reg. 70,076 (Final Rule).

²⁹ 70 Fed. Reg. at 70,076 (Final Rule).

Given the absence of an in-season management need for IFQ fisheries, NPFA requests that the Council direct NMFS to prepare an analysis of further exemptions from observer coverage by restructuring the no-selection pool to include vessels that fish fewer than 2 – 3 trips per year, thus reducing the diversion of limited observer resources to vessels that catch smaller numbers of fish. For example, in 2015, 332 hook and line vessels in the small vessel trip pool made 1,854 trips.³⁰ The analysis could consider: (1) how many of those vessels made only 1-2 trips; (2) how many vessels made 3-5 trips and (3) how many vessels made 6 or more trips. Then the analysis could break down those categories by retained catch. NPFA believes that those vessels making a small number of trips cumulatively harvest a small proportion of the quota, and thus the analysis may point to an area where the program could realize cost savings without significantly compromising the overall observed amount of catch from the IFQ fisheries. NPFA has had a longstanding concern that there is cost-inefficiency associated with allocating observer days to vessels fishing small amounts of IFQ, and further analysis may verify that it is most cost-efficient given available resources to increase the number of vessels in the no-selection pool.

NPFA also suggests that additional analysis could identify fleet segments that are more expensive to monitor. One of the major cost inefficiencies results from deployments out of small, remote locations.³¹ Further analysis should consider the ratio of travel costs to sea days in order to identify fleet segments that are more expensive to monitor. Such analysis could further inform priorities. Importantly, NPFA believes that some of the more expensive remote deployments may overlap with vessels fishing smaller amounts of IFQs discussed in the preceding paragraph.

NPFA also believes that the Council should await optimization of electronic monitoring (EM) prior to any further consideration of raising the fee percentage. Our members fish on a variety of vessel sizes and for many of these vessels it is impractical to take an observer. NPFA has thus worked proactively to advance the use of EM technology for both IFQ and Pacific cod pot boats with the goal of developing a technology that meets the monitoring needs of NMFS and the Council. The Annual Report identifies a “fully loaded” EM cost of \$1,106 per day – similar to the cost of observer coverage.³² However, is that really the long-term daily cost? ALFA’s 2012 pilot study demonstrated at sea day costs ranging between \$200 and \$330 for equipment, field service and data review. The ADP estimates that 76 vessels will participate in the EM program in 2017 and NPFA anticipates that eventually EM will become the standard monitoring technology for at least 350 ≥40 feet participating in the IFQ and pot fisheries in the Gulf of Alaska, and ideally for larger vessels as well.

³⁰ 2015 Annual Report at 75.

³¹ *Id.* at 31.

³² *Id.*

Finally, NPFA appreciates the Council's direct efforts to request additional federal funding for the program, and requests that the Council renew its supplemental funding request now that increased observer day costs and reduced fee revenues make it difficult to maintain the minimum coverage levels needed to optimize the program.

An additional reason why NPFA does not support increases to the observer fee is that the Council and fishery stakeholders have not had the opportunity to review target performance standards for the data from the observer program, or changes in data quality that may result from various observer coverage allocations. The Final Rule for the restructured observer program anticipated that the restructured observer program would improve NMFS's ability to estimate bycatch and that the ADPs would address uncertainty in the agency's bycatch estimates.³³ Similarly, the Environmental Assessment for the restructured observer program specifically anticipated that NMFS would analyze variances, and use them to inform the level of sampling effort needed to achieve statistically reliable bycatch estimates.³⁴

However, the ADP did not evaluate performance in terms of precision and accuracy but instead used gap analyses – whether there would be data gaps in certain fisheries - as a performance metric.³⁵ The Council and fishery stakeholders will be able to review variance estimates in subsequent analyses – when they become available.³⁶ At the very least, the ADP should have provided more explicit discussion of work on variance estimates to date in order to better enable fishery stakeholders and the Council to provide more specific input or make recommendations regarding changes in sampling strata or priorities.

This review should occur prior to any consideration of increases in the observer program fee percentage. NMFS has recognized that “for fisheries where observer coverage is needed to monitor bycatch ... a level of coverage should be deployed that provides statistically reliable bycatch estimates.”³⁷ The SSC identified “a critical need to calculate the variances associated with the point estimates (e.g. target catch, by- catch) to aid with the optimization of the observer deployment sampling design and to assess uncertainty in estimates of catch.”³⁸ Thus, while the ADP shows how NMFS will spend \$3.9 million on deployments, it never explains whether bycatch estimates will be of sufficient data quality to manage the fisheries within PSC limits.

³³ 77 Fed. Reg. at 70,066-70,067.

³⁴ See *supra* n. 8 at 155 (NMFS 2012 EA).

³⁵ Draft ADP at 21.

³⁶ *Id.*

³⁷ 68 Fed. Reg. 11,510, 11504 (2003).

³⁸ 2017 Draft ADP at 16; 2015 Annual Report at 48.

And considerable uncertainty remains about estimated halibut bycatch in the Gulf of Alaska – as explained in 2016 by the IPHC: “observer coverage for most fisheries is relatively low, ... and the extrapolation of bycatch rates from a small set of observed vessels to a much larger unobserved fleet renders the [bycatch] estimates ... uncertain.”³⁹

The 2015 & 2016 Annual Reports also identify evidence of an observer effect for large and small vessels and both tendered and non-tendered trips, with differences in catch and duration of trips.⁴⁰ Will lower coverage levels magnify this effect, particularly for PSC limited fisheries? Will there be an increased incentive to make an “observer trip” given the probability that only one out of five trips will be subject to coverage rather than one out of three trips? The Draft ADP does not address this data quality issue – that is particularly important for PSC-limited fisheries. NMFS recognizes that: The management regime can affect both the nature and magnitude of the observer effect. For example, if there are bycatch limits that can either close a fishery or trigger time and area closures, fishermen will have a greater incentive to take actions that result in an observer effect bias.⁴¹

In conclusion, NPFA, like many fishery stakeholders, expected that the restructured program would have prioritized coverage for PSC limited fisheries when first implemented. Fee revenues from our members and other IFQ stakeholders provide a primary funding source, and NPFA had expected that one of the primary benefits from member investments in the program would be improved estimation of halibut bycatch. NPFA urges the Council to direct NMFS to consider a deployment allocation scheme in the future that prioritizes data collection in PSC limited fisheries, and analyze cost-savings opportunities in other sectors as needed to meet that priority.

Respectfully,



G Malcolm Milne

President, North Pacific Fisheries Association

³⁹ See *supra* n. 26 (Williams, G. 2016).

⁴⁰ 2015 Annual Report at 8.

⁴¹ See *supra* n. 25 (Evaluating Bycatch) at 38-39.



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May 30, 2017

Mr. Dan Hull, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

RE: Observer Coverage for trawl vessels

Dear Chairman Hull, Dr. Balsiger and Council Members:

Thank you for considering options to increase the reliability of fisheries management data obtained through the observer program. As part of this process, we encourage you to ensure full coverage for vessels using trawl gear in the Gulf of Alaska (GOA) and Bering Sea/Aleutian Islands (BSAI). There is urgency because this change must be implemented before the National Marine Fisheries Service (NMFS) begins developing the 2018 observer annual deployment plan (ADP) or negotiating long-term service contracts for groundfish observer providers this fall.

NMFS uses information from the North Pacific Observer Program to conserve and manage our fisheries resources and to ensure compliance with applicable laws and treaties. Observer data is “the only reliable and verifiable method available for NMFS to gain fishery discard and biological information on fish.”¹ Observer coverage, however, is not set to obtain the most accurate catch, bycatch or discard estimates. Nor is it optimized for reducing bias in high volume, high discard trawl fisheries. Instead, NMFS establishes the deployment rate for observers using the available budget and the amount of fishing that is expected to occur, with the goal of obtaining a representative sample of the groundfish catch.² Observer coverage should be tailored for different gear types and target species to best collect information for management.

The 2016 Observer Program Annual Report does not provide sufficient information about the effects of the observer coverage rates on the estimates of bycatch and discards to allow a meaningful analysis. We ask the NPFMC to urge NMFS to report catch and bycatch estimates with clearly defined standard deviation or standard error. This issue is particularly important now because the observer coverage rates for the 2017 season are much lower than those in 2016. As observers are deployed on fewer and fewer fishing trips, less catch is sampled and, accordingly, less discarded catch is observed. The observer coverage in the GOA trawl fleet, for example, dropped from 28% in 2016 to an estimated 18% in 2017.

¹ NMFS (National Marine Fisheries Service). 2016. 2017 Annual Deployment Plan for Observers in the Groundfish and Halibut Fisheries off Alaska. National Oceanic and Atmospheric Administration, 709 West 9th Street. Juneau, Alaska 99802.

² Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

Fewer observers results in less accountability for individual vessels; especially for the high volume, high discard trawl fleet, accountability for each vessel is very important.

Moreover, partial observer coverage of catcher vessel bottom trawlers does not provide sufficient information from which to make reliable estimates of bycatch in the high volume, high discard bottom trawl fisheries. Individual hauls by trawlers are large, with catches between 5 and 15 metric tons.³ When trawlers target shallow-water flatfish and arrowtooth flounder, discards can sometimes represent over 50% of the haul.² Estimating bycatch and discards in the bottom trawl catcher vessel fleet is already problematic because large hauls and high discard rates mean that species comprising a smaller proportion of the catch, like prohibited species, may not even be detected by the observer.⁴ The GOA trawl fleet is still in the midst of controversial Chinook salmon and Pacific halibut bycatch management, and 2017 is a particularly inopportune time to leave observers off their boats. Underestimates of salmon or halibut bycatch impact corresponding stocks and associated fisheries, and overestimates can cause premature closures of the groundfish fisheries. The reasonable solution is more observer coverage to have better information.

Full observer coverage would also greatly decrease the “observer effect,” which can skew bycatch data in two ways: fishermen may under-report bycatch on unobserved hauls⁵ or fishermen may change their fishing behavior based on the presence or absence of an observer.⁶ Changes in behavior can include taking shorter trips with the observer, as was seen in 2016, when trawl vessels with observers took 12.8% fewer days per trip than unobserved trips.² Vessels may also fish with less effort to comply with coverage requirements while minimizing the amount of observed bycatch. Again, in 2016, trawl vessels with observers had fewer species “landed” or identified with observers onboard compared to the species composition of unobserved hauls offloaded in port. Finally, many vessels may choose to offload to tenders in order to avoid carrying observers, a problem particularly evident in the Western Gulf of Alaska and described Table 1. In 2016, there were no deliveries observed at King Cove in the partial coverage fleet, which means that there were no Chinook salmon bycatch sampled from those trawl trips, and it suggests that some boats are exploiting a loophole to avoid carrying observers and sampling their catch.

³ Cahalan, J.A. 2010. At-sea monitoring of commercial north Pacific groundfish catches: a range of observer sampling challenges. AFSC Quarterly Report Feature, July-August-September 2010.

⁴ Cahalan, Jennifer; Faunce, Craig; Bonney, Julie; and Swanson, Robert, "A field test of fisheries observer sampling methods for estimation of at-sea discards" (2016). Publications, Agencies and Staff of the U.S. Department of Commerce. Paper 531.

⁵ Burns, R. J., and G. N. Kerr. 2007. Observer effect on fisher bycatch reports in the New Zealand ling (*Genypterus blacodes*) bottom longlining fishery. New Zealand Journal of Marine and Freshwater Research 42: 23 – 32.

⁶ Faunce, C. H., and S. J. Barbeaux. 2011. The frequency and quantity of Alaskan groundfish catcher-vessel landings made with and without an observer. ICES Journal of Marine Science 68: 1757-1763.

Table 1. Gulf of Alaska pollock deliveries observed in 2016.⁷

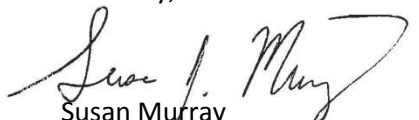
Port	Total Pollock Deliveries	% Deliveries Observed
Kodiak	1097	28.7
Dutch Harbor and Akutan	165	30.9
King Cove, Sand Point, Floating Processors (IFP)	911	6.6

Full coverage in the trawl fleet would benefit the fisheries. It would help managers minimize uncertainty in catch and bycatch estimates; streamline the management and logistical needs of the Observer Program; and even the playing field for all trawl vessels. In 2016, 56 bottom-trawlers in the GOA and 24 bottom trawlers in the BSAI were partially observed.⁸ Some of those vessels may have fished in both regions. Keeping a particular vessel in the full observer category all year simplifies management and enforcement. Partial coverage is less efficient on a cost per unit basis than full coverage.⁹ The Alaska Groundfish Data Bank has acknowledged that members of the trawl fleet are currently gaming the system.¹⁰ Full observer coverage would create more equity and fairness among the fleet.

Changes to the Observer Program must be made to reflect that minimizing Chinook salmon and Pacific halibut bycatch are conservation and management priorities. There is the need to improve bycatch estimates from the high discard bottom-trawl fisheries and to monitor fishery behavior with regard to prohibited species. Violations involving GOA salmon bycatch in the partial coverage fleet increased from 2015 to 2016.² Full observer coverage could be afforded the fleet by adding it to the full observer coverage categories defined in regulation.¹¹

Observer coverage is important for the health and reputation of Alaskan fisheries. The groundfish observer program continues to be an essential component of Alaska's federal fisheries management system. To ensure sustainable and lawful management into the future, we urge you to create a full observer coverage category for the trawl fleet.

Sincerely,



Susan Murray
Deputy Vice President, Pacific
Oceana

⁷ Adapted from Table 3-7. Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

⁸ Table 4-1. Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

⁹ Alaska Fisheries Science Center and Alaska Regional Office. 2017. North Pacific Observer Program 2016 Annual Report. AFSC Processed Rep. 2017-07, 143 p. Alaska Fish. Sci. Cent., NOAA, Natl. Mar. Fish. Serv., 7600 Sand Point Way NE, Seattle WA 98115.

¹⁰ NPFMC. 2016. Gulf of Alaska Trawl Bycatch Management Preliminary Economic Analysis. Pg. 225

¹¹ 50 CFR §679.51(a)(1) and (2)



May 30, 2017

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North Pacific Fishery Management Council
RE: Agenda Item C1. Observer Annual Report
Email: npfmc.comments@noaa.gov

Dear Council Members:

Peter Pan owns and operates the King Cove shore based processing facility in the Western Gulf of Alaska region along with a shore support facility in Sand Point. We are writing to you today regarding Agenda Item C1 Observer Annual Report scheduled for Council discussion at the June meeting.

Peter Pan Seafoods understands the critical importance of bycatch management in the Gulf of Alaska and we fully respect the role of the Observer Program. The purpose of this letter is twofold: 1) To give background as to the essential need for our company and the WGOA pollock trawl catcher fleet to deliver to tenders and 2) To point out data within the Observer Report that may create a false impression of 2016 observed trips by the WGOA pollock trawl fleet.

We work with a fleet of eight 58' trawlers with some based out of King Cove and some out of Sand Point. We have purchased pollock from the WGOA trawl fleet for many years. A substantial percentage of our annual purchases are purchased and transported to King Cove for processing via tenders. We use tenders to transport fish to King Cove for several reasons. Often times, the main area pollock is harvested is in the Shumagin Islands area which can be a nine to twelve hour run by vessel to King Cove. It would not be economically feasible for vessels delivering to Peter Pan to deliver all their catch to the King Cove dock due to lost fishing time and cost of fuel. The run to King Cove can be unsafe at times especially in winter with a 58' vessel. Aggregating deliveries onto tenders that are capable of handling adverse weather conditions enables vessels delivering to Peter Pan to continue to fish efficiently and safely. Due to Stellar Sea Lion concerns, a large percentage of the annual WGOA pollock TAC is allocated to the C/D seasons. Chinook bycatch mitigation is enhanced by faster pollock removals facilitated by tender availability prior to chinook encounters increasing later in the fall.

Table 4 – 1 and Table 4 – 9 in the May 2017 Annual Observer Report show that in 2016, for GOA pelagic trawl gear, 30% of the trips and 29% of the retained catch was observed, respectively. The report also suggests there was no temporal or spatial bias across any of the gear strata in the partial sector. However, Table 3-7 in the May 2017 Annual Observer Report can create the assumption that there were no observed trips to King Cove or on the King Cove fleet in 2016. This is not the case. The facts are that in compliance with the existing partial observer program, many of the WGOA fleet delivering to Peter

Pan had observers on board for at least one trip with several having multiple observed trips as documented by their fish tickets. I am uncertain how Table 3-7 was developed, why the overall coverage rate was so low, and whether deliveries are defined as number of fish ticket records or number of trips as defined in regulation. Often in 2016, the WGOA fleet delivering to Peter Pan started and ended their trips in Sand Point, however 100% of the fish we purchased from them went to King Cove for processing including the trips when they had observers on board.

While we agree that better solutions for how to monitor pollock tender trips warrants discussion, we think those solutions can be remedied within the partial observer coverage context. The Observer Advisory Committee has noted interest in clarifying this matter and developing potential solutions for the Council to consider. We note that Electronic Monitoring development has progressed and fieldwork is planned for 2017. This technology may be a useful part of the observer program for tendered fish in the future. We are available to work together with the Observer Program and the WGOA fleet to come up with equitable solutions.

Sincerely



Dale Schwarzmiller
Vice President, Alaska Production
Peter Pan Seafoods, Inc.

Cc: Glenn Guffey, Peter Pan Seafoods.
Nicole Kimball, Pacific Seafood Processor Association.

Peninsula Fishermen's Coalition

Beth Stewart, Executive Director

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Dan Hull, Chairman

May 26, 2017

North Pacific Fishery Management Council

605 West 4th Avenue

Anchorage, Alaska 99501

npfmc.comments@noaa.gov

In Re:
Observer Annual Report and E1 Staff Tasking

Dear Chairman Hull:

Thank you for the opportunity to comment on the Observer Annual Report. The Peninsula Fishermen's Coalition is still very concerned about the way in which landings are calculated for the <60' foot fleet, particularly for those vessels delivering to tenders. We are also concerned about how tender deliveries are assigned to a port of delivery. PFC continues to have issues with the accuracy of basket samples for salmon, and continues to push for a census for salmon. You should have received comments from members Ben Ley and Jody Cook which will contain more detailed discussion of these issues.

Kiley Thompson has spoken to NMFS about one of the tables, and any comments on that issue would be premature today. The question was about Table 3.7 which does not ascribe deliveries into King Cove. This is no doubt a problem arising out of the difficulties dealing with tender deliveries.

I had the opportunity to review a preliminary report on the OAC's recent meeting, and as regards the WGOA, we agree with the committee's recommendations.

In terms of PFC member participation in GOA trawl bycatch management overall, the Peninsula Fishermen's Coalition appreciates the efforts the Council has made to schedule GOA Trawl Bycatch Management discussions during meetings that allow maximum participation by our members.

We respectfully ask that the Council note that our fleet participates in the salmon purse seine fishery as well as the P. cod pot and trawl fisheries, the pollock trawl fishery, and many of the vessels also have halibut IFQ.

Therefore, we would ask that if at all possible, GOA Trawl Bycatch Management issues be scheduled December. The April meeting is not ideal, but some members could also participate in that meeting.

We continue to look forward to addressing salmon and halibut bycatch proposals for the WGOA, and working within the Council process to find solutions.

Thank you for taking our comments.

Sincerely,

Beth Stewart (for Kiley Thompson)



Southeast Alaska Fishermen's Alliance

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May 30, 2017

North Pacific Fishery Management Council
Chris Oliver, Executive Director
604 W 4th Ave, Suite 306
Anchorage, AK 99501

RE: C1 – Observer Annual Report and OAC Meeting

Dear Council Members,

As a member of the OAC, I attended the meeting in Seattle in late May and we were discussing the new upcoming process for the next contract as well as getting an update on the insurance issue. Based on the insurance update and the timing for the new contract, I would like to emphasize the OAC recommendation and respectfully ask the NPFMC to request the agency to act to remove the regulations requiring insurance that is not applicable to observers at this meeting. In order to get the best price on the contract and get the most sea days possible it would be important for these insurance requirements to be dealt with and finalized prior to the contract RFP going out to bid.

Sincerely,

Kathy Hansen
Executive Director