



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

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## C-8 observer coverage small CPs

2 messages

**Adam Lalich** <vamosak@hotmail.com>

Sun, May 24, 2015 at 7:08 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

May 24 2015

C-8 observer coverage small CPs

Chairman Hull and all council members

My name Adam Lalich owner, operator of small, 44ft, soon to be catcher processor, in the jig fishery, f/v YORJIM

I have been fishing in Alaska for the past 36 yrs

I do agree with the proposed PPA alternative submitted at the last council meeting as it will far exceed my needs in the processing end of my operation.

1- I just jig 36 hooks in a 20ft square area with 3 machines, soak time 5-7 minutes

2- very small bycatch if any

3- I will never be able to do more than 5000lbs round a day, as was the no observer ruling prior to the restructuring of the observer program,

4- I hold a FFP for jig catcher vessel but fish very little outside 3 mile limit

5- I do the state water jig and rockfish fishery when it is open

6- jig vessels are exempt from observer coverage yet do pay in when we are involved in the federal groundfish fishery which I agree with

7- jig vessels are not required to have a VMS, as the impact is so small

8- of the 3 jig vessels that can freeze, we all are capable of catching a lot more when icing than we are capable of freezing

Thanks for listening Adam Lalich f/v Yorjim

907 359 1332 [vamosak@hotmail.com](mailto:vamosak@hotmail.com)

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**NPFMC comments - NOAA Service Account** <npfmc.comments@noaa.gov>

Sun, May 24, 2015 at 7:08 AM

To: [vamosak@hotmail.com](mailto:vamosak@hotmail.com)

Thank you for your comment. This comment will be posted in the briefing material for the June meeting if received before May 26, 2015 at 5:00 pm. Comments received after that date/time will not be posted/copied.

May 26, 2015

Mr. Dan Hull, Chairman  
North Pacific Fishery Management Council  
[npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

Sent via Email

Re: June 2015 meeting agenda item C-8 – final action scheduled for observer coverage on small CPs

Dear Mr. Hull:

We represent Far West Fisheries LLC, owner of the 57-foot fishing vessel CERULEAN.

Far West Fisheries supports the Council's preliminary preferred alternative (PPA) for placing certain catcher-processor vessels with limited production under partial observer coverage. A copy of the PPA, as adopted by the Council at its April meeting, is attached.

Far West Fisheries appreciates the time the Council and the National Marine Fisheries Service have devoted to this issue, and supports adoption of the PPA as the Council's final action on this matter at its June meeting in Sitka.

Thank you for your consideration of these comments.

Sincerely yours,

Sullivan & Richards LLP

*Andrew Richards*

Andrew Richards

## Appendix B: AP Motion on Observer Coverage on Small CPs with Preliminary Preferred Alternative - Adopted by Council (April 12, 2015)

### Agenda C-8

The AP recommends the Council release the draft RIR/IRFA for public review after incorporating suggestions by the SSC.

Revise Alternative 2 to modify Element 5 (described below).

Select Alternative 2 as the Preliminary Preferred Alternative (PPA). Preferred elements in **bold**.

At its April 2015 meeting, the Council adopted the Preliminary Preferred Alternative (PPA) that was recommended by the Advisory Panel. The elements of the Council's PPA are in bold:

#### Purpose and Need Statement

*Under the Restructured Observer Program, all catcher/processors are in the full coverage category unless they meet the requirements for an allowance to be placed in partial coverage. The placement of catcher/processors in full coverage enables NMFS obtain independent estimates of catch, at sea discards, and prohibited species catch (PSC) for catcher/processor vessels. In recognition of the relatively high cost of full coverage for smaller catcher/processors and the limited amount of catch and bycatch by these vessels, the Council recommended two limited allowances for placing a catcher/processor in partial coverage. Both of these allowances were based on vessel activity between 2003 and 2009.*

*Since implementation of the Restructured Observer Program, owners and operators of some catcher/processors have requested that the Council and NMFS revise these allowances to include vessels that began processing after 2009. First, the allowance for placing a catcher/processor in partial coverage should, as a minimum, be based on a measurement of ongoing production that shows that the catcher/processor processes a small amount of groundfish relative to the rest of the catcher/processor fleet. Second, the current regulations do not provide a way to move a catcher/processor placed in partial coverage into full coverage if production increases to a level deemed appropriate for full coverage.*

*This action would maintain a relatively limited exception to the general requirement that all catcher/processors are in the full coverage category; provide an appropriate balance between data quality and the cost of observer coverage; and establish a basis for placing catcher/processors into partial coverage that is not unduly difficult to apply and enforce.*

#### Alternatives

**Alternative 1**, No Action; maintain existing exemptions.

**Alternative 2. Revise the allowances for NMFS to place small catcher/processors into partial coverage. The criterion for placing a catcher/processor in partial coverage is the vessel's production in the basis year as determined under Element 2.**

**Under this alternative, when a catcher/processor is required to have  $\geq 100\%$  observer coverage because of the vessel’s participation in a catch share program, the vessel would be ineligible for partial observer coverage under this action.**

**Element 1: Production threshold for placing a catcher/processor in partial coverage.**

Option	Measure	Threshold based on 10 <sup>th</sup> percentile approach		Threshold based on kernel density distribution approach	
		Pounds (metric tons)			
1.	Average daily production	1A.	11,000 (5.0)	1B.	15,500 (7.0)
<b>2.</b>	<b>Average weekly production</b>	2A.	42,000 (19.1)	<b>2B.</b>	<b>79,000 (35.8)</b>
3.	Maximum daily production	3A.	26,000 (11.8)	3B.	44,000 (20.0)
4.	Maximum weekly production	4A.	94,000 (42.6)	4B.	197,000 (89.4)
5.	Annual production	5A.	677,000 (307.1)	5B.	2,665,000(1,208.8)

**Element 2. The basis year for placing a catcher/processor in partial coverage is the vessel’s production in a standard basis year or alternate basis year. The standard basis year is the fishing year minus two years. If the vessel has no production in the standard basis year, the alternate basis year will be the most recent year that the vessel has any production before the standard basis year going back to 2009.**

**Element 3: If a catcher/processor has no production in the basis year as determined under Element 2,**

Option 1. Place the catcher/processor in full coverage.

**Option 2. Place the catcher/processor in partial coverage.**

Option 3. Place trawl catcher/processor in full coverage until vessel has production history; place other catcher/processers in partial coverage until vessel has production history. [Note: Under Element 5, the Council’s PPA places all trawl catcher/processors in full coverage.]

**Element 4. For a catcher/processor to be in partial coverage,**

**Option 1. Vessel owner must choose partial coverage for the upcoming fishing year by an annual deadline (otherwise in full coverage).**

Option 2. NMFS places vessel in partial coverage for the upcoming year without any action by owner.

**Element 5. Trawl catcher/processers are ineligible for partial observer coverage (i.e., always in full observer coverage).**

Mr. Dan Hull, Chairman  
North Pacific Fishery Management Council

Re: June 2015 meeting agenda item C-8 Observer coverage on small C/Ps

Dear Mr . Hull:

I am a member of Lone Larsen LLC, which is the owner of the 98 ft Pacific Sounder. In 2011,12 & 13 we operated as a C/P in Bering Sea and Aleutian Islands BSAI hook and line Sablefish & Turbot fisheries.

We fully support for the Council to adopt its preliminary preferred alternative as its final action on this issue, with the preferred alternative attached to the comment.

Regards,

A handwritten signature in cursive script, appearing to read "Oystein Lone", with a long horizontal flourish extending to the right.

Oystein Lone  
Operator/Owner/Manager Pacific Sounder