



C5/C6PUBLIC COMMENT
October 2015

Southeast Alaska Fishermen's Alliance

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September 29, 2015

North Pacific Fisheries Management Council
605 W Ave. Suite 306
Anchorage, AK 99501

Sent via email: npfmc.comments@noaa.gov

RE: C5 EM & C6 Observer ADP

Dear Dan Hull, Chair and Council Members,

Southeast Alaska Fishermen's Alliance (SEAFA) would like to take this opportunity to speak to agenda items C5 & C6 regarding the re-structured observer program. As a member of the OAC we participated in the recent meeting and support the recommendations as the OAC verbally discussed them (minutes are not posted yet). We are writing about these two issues together because there is linkage between them and the acceptance of OAC recommendations.

First we support maintaining all vessels in the trip selection pool but changing the strata as recommended by NMFS to a gear selection strata w/ optimal allocation rather than by length of vessel. We believe this will be an improvement in a variety of ways.

In regards to the conditional releases we support the OAC recommendation to not allow releases for life rafts on the condition that the EM pre-implementation period needs to be re-opened and all available spaces (60) be filled with a priority given to those vessels that have received a release either due to bunk space or life raft capacity the priority for available opportunities to fill out the EM roster. As

with the OAC, SEAFA does not support changing the release by the ODDS system for small vessels if you are picked for a third consecutive trip to carry an observer. Our support for the change in conditional release policy for bunk space and life rafts is completely contingent upon having the EM pool option that fisherman could opt in to.

SEAFA does not support the recommended change in the ADP from three trips to two trips. More information needs to be provided. The reasoning for this change is the number of observed trips cancelled in the ODDS system compared to the unobserved trips. This could be a combination of many factors, you can change an unobserved trip but an observed trip you can't. Best scenario would be for NMFS to try and determine a way either in the ODDS system as a trip is cancelled or a survey at a later date the reason why an observed trip was cancelled. Information needed in the annual report next year is the observed trips that were cancelled, was another trip scheduled and if so did they take an observer. We can envision trips within our fleet being cancelled due to weather, breakdowns or going on another vessel to fish your quota because you were chosen for an observer and didn't have the space.

SEAFA supports the EM pre-implementation plan and appreciates all the work that has occurred this year to finally get this important component of the restructured observer program this much farther along.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line extending to the right.

Kathy Hansen
Executive Director