

December 2, 2014

Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
npfmc.comments@noaa.gov

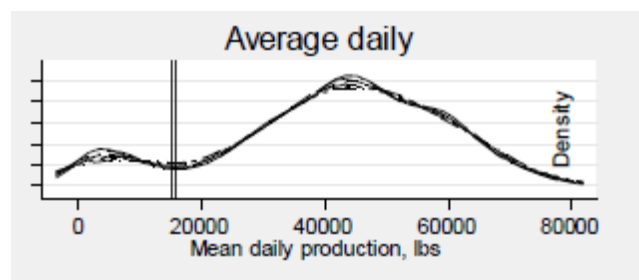
Sent via Email

Re: December 2014 meeting agenda item C-9 – observer coverage on small CPs

Dear Mr. Hull:

We represent Far West Fisheries LLC, owner of the 57-foot fishing vessel CERULEAN. The CERULEAN currently operates as a catcher vessel (CV), mainly in the Bering Sea and Aleutian Islands (BSAI) hook-and-line halibut and sablefish fisheries under the individual fishing quota (IFQ) and Western Alaska Community Development Quota (CDQ) programs. The vessel also participates as a CV in pot cod fisheries in the Bering Sea and Gulf of Alaska.

Although the CERULEAN is currently operating as a CV, the vessel was designed to operate as a catcher-processor (CP) in the sablefish fishery and would be operating as a CP in that fishery but for the high cost of 100% observer coverage required of almost all CPs. In response to concerns about that cost, the National Marine Fisheries Service (NMFS) recently issued a discussion paper on a potential observer program amendment that would place relatively low-production CPs in partial coverage. That would require identifying a threshold of production under which partial coverage would apply, and over which 100% coverage would apply. The agency's statistical analysis suggests it would be quite feasible to identify an appropriate threshold, as the analysis shows two distinct groups of CPs – one group of relatively low-production CPs and another group of relatively high-production CPs:



NMFS Discussion Paper, November 28, 2014, p. 27, Figure 3.

In its discussion paper, NMFS proposes several thresholds for further analysis, along with a Purpose and Need Statement and a Statement of Objectives. Far West Fisheries LLC supports the agency's proposals and requests that the North Pacific Fishery Management Council adopt them as stated in the discussion paper.

Far West Fisheries supports amending the observer program to place relatively low-production CPs in partial coverage for two reasons. First, the cost of 100% coverage on long sablefish trips far west in the BSAI – on which observer daily rates would have to be paid for days of production and days of no production running to and from the grounds – has kept the CERULEAN from commencing CP operations in that fishery. Partial observer coverage would make CP operations more cost effective and allow the CERULEAN to extend its trip length in remote areas, which would help the vessel fully harvest the sablefish available to the vessel and its IFQ and CDQ partners. That can be difficult to do in the BSAI, where NMFS records indicate only 36% (BS) and 45% (AI) of sablefish IFQ total allowable catch (TAC) was landed in 2014. Over 90% of TAC was landed in every other area.

Second, partial coverage based on a production threshold could mitigate another issue that “hybrid” vessels operating as both CPs and CVs presently have under the observer program. Current regulations require that a vessel operating as a CP in any fishery maintain 100% coverage in all fisheries, even fisheries in which the vessel operates as a CV and would otherwise be subject to partial coverage. If the CERULEAN were to begin operating as a CP in the BSAI sablefish fishery, it would be subject to 100% observer coverage in that fishery and also in the pot cod fishery in which it will continue to operate as a CV, and in which CVs are otherwise subject to partial coverage. Far West Fisheries supports addressing that issue while analyzing approaches to placing low-production CPs in partial coverage.

Thank you for your consideration of these comments.

Sincerely yours,

Sullivan & Richards LLP

Andrew Richards

Andrew Richards