

The logo features a stylized anchor with a fishing hook integrated into its design, positioned to the left of the text.

Alaska Longline

FISHERMEN'S ASSOCIATION

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November 26, 2013

Dr. Jim Balsiger
National Marine Fisheries Service
PO Box 21668
Juneau, AK 99802

Dear Dr. Balsiger,

We have reviewed the National Marine Fisheries Service (NMFS) and Alaska Fisheries Science Center (AFSC) comments on ALFA's EFP application: Integrating Electronic Monitoring of Fixed Gear Vessels with the North Pacific Research Plan. We sincerely appreciate the time and effort both NMFS and the AFSC dedicated to reviewing and commenting on the EFP. Clearly significant time and resources were committed despite already busy schedules.

ALFA and the EM EFP "team" believe we can accommodate the technical recommendations made by the AFSC. In fact, some of the recommendations match year 2 or 3 EFP objectives, with details to be decided pending review of year 1 data. Other suggestions, such as the power analysis, will strengthen the EFP and we have already initiated work to incorporate these recommendations.

The comments from the Region range from easily accommodated to recommendations that would fundamentally change the nature of ALFA's EM EFP. Relative to the latter: we proposed a multi-year project focused on integrating EM as an at-sea monitoring system to secure representative data from the fixed gear fleet; in our view, the Region's recommendations change the EFP to a series of short-term pilot programs using volunteer vessels with unspecified objectives. While we appreciate the suggestions, ALFA and other organizations have completed pilot programs that addressed many of the logistical issues NMFS has raised. We believe that many attributes of EM systems are known and that logistical factors and data quality can be improved with experience. We firmly believe EM will, at best, remain in the pilot program stage until EM field work is focused on achieving *fishery specific* monitoring objectives designed to meet clearly identified management needs as part of an integrated data collection plan.

The EFP application and review process has clarified for us the fundamental difference between the Region's view of EM development and the view of the stakeholders who have worked with ALFA to develop this EFP. We recognize that progress on the EFP is not possible without a shared vision, shared goals, and a joint commitment to EM implementation. We would like to work with NMFS and the AFSC to build that shared vision, and hope you and your staff are likewise willing to work with us.

Building a shared vision

We believe building a shared vision will require a facilitated collaborative process that engages fishery managers, IPHC and sablefish stock assessment scientists, EM providers, observer program personnel, and fishermen stakeholders. For the process to be successful, we believe both sides must be committed to completing by June 2014 a mutually supported EM roadmap for Council review. We suggest this date because in June the Council is scheduled to review the observer program and consider changes to the deployment plan that affect “trip selection” and “vessel selection” criteria specific to gear type and fishery. The use of an EFP or other vehicle as part of a well-defined, mutually supported process to create an integrated alternative for fixed gear vessels should be part of that review. We believe the process must also identify a mechanism to fund EM deployment as an integrated alternative to observers. It is our hope that we could meet prior to the Council’s December meeting to design and schedule the process to identify common ground, and to discuss how we can work together in the interim to advance EM.

2014 Cooperative Research

In a recent call, you suggested ALFA and NMFS explore opportunities for 2014 EM cooperative research. If 2014 EFP implementation is not possible, we would like to work with NMFS on 2014 cooperative research initiatives, such as the EM Pilot program, that will serve as stair-steps to the EM EFP. Critical to the success of any cooperative research effort is a common vision, inclusion of key stakeholders and outside expertise as needed in planning, timely review of the data, and timely communication between all parties involved to ensure successful coordination. At this point we suggest three primary goals for that research that could be incorporated into the EM pilot program for 2014.

Goal 1: Evaluate EM deployment techniques that obtain representative data.

- a) Identify and evaluate procedures to efficiently deploy EM systems on boats randomly selected from the “vessel selection” strata that request observer releases (due to bunk space or safety limitations).
- b) Explore other strategies for gathering representative data.

Discussion: Again, we anticipated the EFP would provide an EM alternative in 2014, which would in turn increase at-sea monitoring levels for the vessel selection strata. We would like to see these two objectives met through the 2014 cooperative research. As recommended in the AFSC and NMFS comments, we propose developing written agreements for vessel operators that commit operators and crew to making their vessels available in specific ports for installation, complying with specific on-board EM equipment maintenance procedures, and to complying with some of the other recommendations from sections 2 (*Responsibilities for participating EFP vessels*) and 3.1 (*Fleet logistics and deployment*) of the Region’s comments.

Goal 2: Deploy EM systems on volunteer “trip selection” vessels to test system reliability, evaluate alternative metrics, evaluate data quality improvements over time, and compile a large enough data

pool to evaluate data review methodologies, data processing time, and data review costs associated with an operational program.

Discussion: In comments on the EFP, AFSC suggested evaluation of various sample rates, metrics, and methodologies to improve EM data review and analysis. Deploying EM systems on trip selection vessels with substantial quota holdings will provide sufficient data to initiate the analysis AFSC recommends and to gather meaningful cost data on EM deployment and data review. We suggest engaging multiple EM service providers in this segment of the research to allow system comparisons relative to reliability, image quality, vessel compatibility, and cost. The data review component should allow for timely review of the data and feedback to involved parties.

Goal 3: Deploy EM on select segments of the halibut and sablefish longline surveys to conduct fine scale research on average weight estimates, mortality rates associated with release techniques, and the ability to collect length data from EM video.

Discussion: Studies on extracting length data from EM video images and identifying appropriate size categories to apply average weights may best be conducted using side-by-side coordination with observer data. Likewise, evaluating the efficacy of different release techniques, as suggested in the NMFS review, may also require observer evaluation to calibrate cues visible in the EM data. The stock assessment survey vessels offer a unique platform to conduct side-by-side comparisons.

Overview: Although other goals could be included in the cooperative research, given time and funding restraints we have limited our suggestions to these three. We consider these three goals critical to stakeholder confidence in this process. While we recognize additional discussion and refinement will be necessary, we hope these are goals that both the Region and the AFSC can support.

Conclusion

In closing, ALFA is deeply committed to providing EM as an integrated alternative to observers and believes it will serve a vital role in securing representative data from the fixed gear feet. We recognize that a shared vision between NMFS and stakeholders is necessary for the potential of EM to be realized, and will fully commit to a collaborative process to develop that shared vision. While we work through that process, we are willing to work with NMFS and the AFSC to lay the groundwork for EFP implementation through 2014 cooperative research projects that meet our collective goals. To launch both processes, we request a meeting of all parties prior to the December 2013 Council meeting.

Thank you for your time and willingness to work with us to define the path ahead.

Sincerely,



Linda Behnken
(Executive Director, ALFA)

