

January 30, 2014

Chairman Eric Olson
North Pacific Fisheries Management Council

Dear Chairman Olson,

Prior to the observer delivery model restructure in 2012, we raised our concern that the process for growing Lead Level 2 observers for the longline fleet was going to be compromised in that an insufficient number of assignments that could generate Lead Level 2 observers would be available to those providers working in the 100% restructured pool. The process of growing leads was further hindered by the adoption of flow scales in lieu of a second observer by the longline fleet. This, coupled with normal observer attrition in the past 2 years, has further reduced the number of available Level 2 Leads in this most difficult fishery. When we sounded the alarm in 2012, NMFS provided an in-depth analysis that showed a sufficient number of leads could be produced and made available for deployment see (Attachment 1, pages 59-). We request that NMFS provide an update on the number of observers who met the requirements for Lead Level 2 observers duties.

Unfortunately, the reality of the past two years and our collective experience as observer providers has shown a declining population of Lead Level 2 observers with no realistic replacement happening. Our effort to recruit and retain experienced Lead Level 2 observers with higher pay and bonuses does not stem the natural attrition that all contractors face. Collectively, we providers are gravely concerned that we are on the brink of running out of a robust pool of qualified observers, resulting in one or more longline vessels left at the dock without an observer very soon. However, we believe this does not need to be the case.

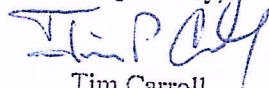
We propose an alternative process, to be pilot tested and potentially used on a limited basis, be undertaken that mirrors the process used by the Alaska Department of Fish and Game in the Bering Sea Crab Observer Program to ramp up seasoned observers. In that program, uncertified observers must debrief by their 36th deployment day. If their reviewed data and collection methods achieve the standards maintained by ADF&G, they are moved to a "Certified Crab Observer" status.

For the longline industry, we propose that chosen experienced observers, without the requisite number of 30 hauls, but who do possess a minimum level of observer experience, be allowed to work in the longline sector in a "trainee" status. Selected observers filling this limited role could be deployed for a maximum of one trip, after which they go through a mandatory debriefing to determine if they can be moved from a "trainee" status to "certified Lead" status. To achieve maximum effectiveness, we request that the interim debrief be held in the field at the port location. NMFS could continue this cycle until such time as either the requisite number of hauls is met, or

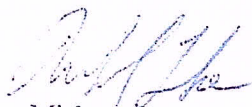
NMFS is comfortable that the observer can be moved to a less frequent debrief cycle. If the pilot is successful, we request that the process be adopted on a limited basis to backstop and prevent stranded boats.

We look forward to the opportunity to work together with the Council and NMFS to find a resolution to this issue.

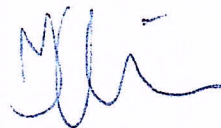
Respectfully,



Tim Carroll
Saltwater Inc.



Michael Lake
Alaskan Observers Inc.



Troy Quinlan
Techsea International

Attachment 1: May 2012 NMFS Analysis

CC:

Mr. Dan Hull, Observer Advisory Committee Chair