



28 May 2014

Martin Loefflad
Observer Program Director
Fisheries Monitoring and Analysis Division
Alaska Fisheries Science Center
7600 Sand Point Way N.E., Building 4
Seattle, WA 98115

Dear Martin,

In 2012, when the regulations governing observer coverage for the Freezer Longline Sector were being developed, Alaskan Observers Inc. (AOI) along with the other North Pacific Observer Providers raised a number of concerns. Central to our concerns was the thought that the regulations would limit our opportunity to replenish our pool of fixed gear leads as we faced attrition from that pool. Now only 18 months since the implementation of those regulations, the Providers' concerns are presenting themselves as today's reality.

In 2012 AOI deployed 157 individual observers. By the end of 2012 81 (52%) of those 157 observers were certified as fixed gear leads. In 2013 AOI deployed 145 individuals and by the end of 2013 89 (61%) were certified as fixed gear leads. There were several factors that contributed to the increase of certified leads in 2013: A onetime regulatory change from 60 sets to 30 sets to qualify as a lead; AOI purposefully placing observers on vessels that did not have flow scales and carried second observers; and several vessels carrying observers who were not required to have fixed gear leads.

Jump ahead to the first half of 2014 and AOI experienced some significant changes in numbers of priors wanting to continue work as observers. We started the year with 103 prior observers expressing interest in work at some time in 2014. We added 23 trainees between January and March which left us with 64 (50%) of 126 observers with fixed gear lead status.

The departure of our priors from observing continues as we look ahead to the period from June through the end of 2014. We currently have only 63 prior observers interested in work through the end of the year. At a minimum we will need to add at another 34 trainees between May and July to cover our boats through the end of 2014. We estimate this will leave us with 44 (36%) of 123 observers certified and available for work as fixed gear leads by the end of 2014.

This decline is partly the result of a rotation of the sort we see every few years, as a group of observers that's been with us for several years begins to move on to other things. This rotation is more dramatic, however, than any we've seen for awhile, perhaps reflecting improved employment opportunities elsewhere. Added to this attrition are two coverage realities: since June of 2013 we have had no fixed gear vessels that are required to carry a second observer, and we have fewer boats in the fishery that

are not required to carry a lead. These diminished opportunities have allowed us to only train 2 new fixed gear leads in 2014.

To deal with our decreasing pool of fixed gear leads AOI has been developing a plan that will allow us to continue to provide observers to our clients without disrupting their fishing operations. Our plan is to ask our clients to voluntarily take second observers. Most of these clients have installed, at great expense, flow scales and cameras to allow a single fixed gear lead to observe on their vessels. To now ask that they occasionally carry a second observer to allow that observer to gain certification as a fixed gear lead is going to significantly add to the cost of coverage projected by the National Marine Fisheries Service (NMFS) in the Regulatory Amendment to Modify Monitoring and Enforcement Requirements in the BSAI Freezer Longline Fleet. AOI then needs some assurances that NMFS will be supportive of us going forward with this voluntary program.

Fortunately, we are not breaking new ground here with vessels voluntarily taking an observer, or by placing any certified observer to serve as a second observer with a certified lead. The Bering Sea cod fleet currently voluntarily carries observers, and there is precedence set from years of vessels fishing in the North Pacific with a certified lead and any certified observer working the alternate shift. Moreover, the regulations for observer coverage for the freezer longline fleet specifically allow for a vessel to carry two observers. The NPGOP policy that allows observers who have 60 sampling days and successfully completed two deployments to attain lead status during a deployment will continue to provide us the best opportunity to replenish all of our lead observer pools.

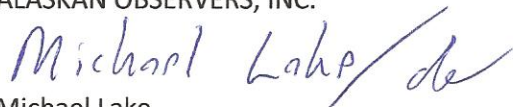
In developing our plan to train new fixed gear leads by asking our clients to voluntarily carry a second observer, AOI identified a significant issue with the way the NPGOP credits observers with sampling experience. The NMFS database is currently programmed to credit a single observer for sampling a set or haul, even when both observers onboard have participated in the sampling process. Because of this limitation, one observer's work goes unrecognized each time both observers are involved in a sample. Historically, when two observers are sampling on a vessel it is left up to the observers to decide who gets credit for the work. We believe it would be more accurate to give credit to observers for any sampling they do while onboard. After all, the NMFS database also counts a single pot lift as a "set" when an observer is on a pot vessel fishing single pots—so it is fair and reasonable to credit an observer for her work when she samples part of a set that involves thousands of hooks retrieved over a number of hours. If the NMFS database cannot reflect this, then NMFS should allow our observers to keep track of any haul or set that they wholly or partially sample and submit any missing sampling credit during their debriefing.

AOI does not view our plan to replenish our pool of fixed gear leads through a voluntary arrangement to be a long-term fix. Rather, it is a necessary step in the short-term to prevent vessels from being held up at the dock. As you can imagine, from the numbers we have presented, AOI is very concerned about the precipitous decline in our pool of prior observers. Because we have in place the means to efficiently get observers to their lead trawl status, the immediate need is to create an equally efficient means to get observers their fixed gear lead certification. The latter will require cooperation between Observer Providers, Industry, and the NPGOP.

The NPGOP's role, though, is essential. Getting our clients to agree to voluntarily take second observers won't accomplish anything if the Observer Program is unwilling to change the way work is credited to those observers. Before we proceed any further down this path, we need to know if we can count on your support. We look forward to your reply.

Sincerely,

ALASKAN OBSERVERS, INC.

A handwritten signature in blue ink that reads "Michael Lake" followed by a stylized flourish.

Michael Lake
President