



State of Washington  
**Fish & Wildlife Commission**

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August 31, 2018

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David Witherell  
Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup>, Suite 306  
Anchorage, Alaska 99501-2252

Dear Mr. Witherell,

The Washington Fish and Wildlife Commission received a briefing at our August 2018 meeting from Council member Bill Tweit on recent accomplishments and current challenges for the North Pacific Fishery Management Council. The Commission supports the Council's work in ensuring the sustainability of the federal fisheries off the Alaska coasts, and appreciates the benefits that Council management brings to the many harvesters, fishing companies and processors that participated in Council fisheries and are homebased in Washington State.

We understand that the Council has been working to improve several aspects of their comprehensive at-sea monitoring program: adding electronic monitoring capabilities to supplement what human observers can accomplish and removing incentives to harvesters to avoid coverage. We understand from public testimony on this issue that, under current federal regulations, harvesters can reduce their chances of being assigned an observer for a fishing trip by repeatedly offloading their catch to a tender instead of delivering onshore to a processing facility. This type of negative incentive is of concern to the Commission for two reasons. This type of apparent loophole erodes public trust in the monitoring program; it also appears to introduce a bias into data obtained by the monitoring program. To the extent that it may compromise the accuracy of estimation of bycatch of salmon originating from Washington State, the Commission is also concerned about the impact to our understanding of interceptions.

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The Commission heard that the Council supports development of a remedy for this apparent loophole, but that priorities have precluded addressing it. The Commission certainly understands and respects the need to prioritize workloads, it does request that the Council continue to look for opportunities to address this situation in order to maintain the trust that Washington stakeholders have in the Council's monitoring programs and to maintain accuracy in the estimates of salmon and halibut bycatch and other fishery statistics that come from the program. Thank you for this opportunity to express our concerns, and please accept our appreciation for your work at maintaining healthy, sustainable fisheries that benefit all participants including our Washington stakeholders.

Sincerely,



Brad Smith, Ph.D., Chair  
Washington Fish and Wildlife Commission

cc: Kelly Susewind, Director  
Ron Warren, Assistant Director, Fish Program  
Bill Tweit, Special Assistant