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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668
June 12, 2012

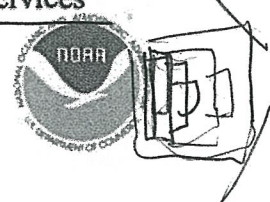
Michael Lake, Alaskan Observers Inc.
Bryan Belay, MRAG Americas Inc.
Stacey Hansen, Saltwater Inc.
Troy Quinlan, Techsea International Inc.

Dear Observer Providers:

Thank you for your letter dated May 16, 2012, explaining your concerns about what may be contained in the proposed rule we are preparing for revisions to regulations governing monitoring and enforcement requirements for the voluntary freezer longline cooperative. Specifically, you stated that the proposal to reduce the number of sets that must be sampled to obtain lead level 2 certification will not adequately address concerns you previously expressed about the supply of lead level 2 observers in the future. You are concerned that observer providers that are not selected to contract with NMFS to provide observers under restructuring of the Observer Program will not have the opportunity to provide observers in their employ with the experience necessary to obtain lead level 2 certification.

We hope to publish the proposed rule within the next few weeks. We encourage you to review the proposed rule and its supporting analysis and submit written public comments during the public comment period on the rule. We have tried to address concerns you raised in previous letters about a potential shortage of lead level 2 observers in the analysis prepared for this issue. This analysis is posted on our website at http://alaskafisheries.noaa.gov/analyses/groundfish/rirea_fllme0512.pdf (see pages 53 through 68 of this analysis).

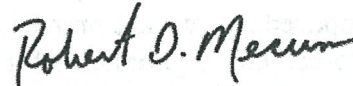
As described in the analysis and previously in letters and presentations to the North Pacific Fishery Management Council, NMFS believes that lead level 2 observers are necessary on vessels in the freezer longline cooperative to collect complete, accurate, and timely fisheries data from this fleet. The analysis indicates that while it has been difficult at times in the past for observer providers to provide an adequate number of lead level 2 observers, the reduction in the number of required sampled sets for lead level 2 certification from 60 to 30 sets will increase the number of lead level 2 observers in the future. **In addition, restructuring of the Observer Program will extend observer coverage requirements to new classes of catcher vessels, including vessels in the halibut fleet. This will provide new opportunities for observers to gain lead level 2 experience.** While the observer provider selected to contract with NMFS under observer restructuring may have the majority of opportunities to deploy its observers on smaller fixed gear vessels and obtain the sampling experience necessary for lead level 2 certification, observers are able to move among observer providers, and other providers will be able to bid for the services of qualified observers to supply lead level 2 observers to the freezer longline fleet.



You also expressed concern that observer providers will not be allowed to place second observers on vessels with one lead level 2 observer to provide that second observer with sampling experience towards their lead level 2 certification. The proposed rule does not include a prohibition on this type of arrangement.

Again, we welcome your comments on the proposed rule and our analysis of the lead level 2 certification requirements. If you have any further concerns or questions about this matter, please contact Jennifer Watson in our Sustainable Fisheries Division at (907) 586-7537 (jennifer.watson@noaa.gov). Thank you for your continued cooperation in our efforts to sustainably manage our federal fisheries.

Sincerely,



for James W. Balsiger, Ph.D.
Administrator, Alaska Region