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April 1, 2014

North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue Ste 306  
Anchorage, AK 99501

**Agenda Item B: NMFS Report**

Dear Chairman Olson,

I am submitting these electronic monitoring (EM) cooperative research comments on behalf of the Alaska Longline Fishermen's Association (ALFA).

As you know, ALFA is actively participating in the on-going EM cooperative research. Our goal has been to engage all stakeholders, including EM providers, industry, AFSC and NMFS, in EM cooperative research to address persistent questions about EM capabilities, develop a number of EM approaches, and synthesize the information into decision points for the Council. Although we had hoped to be further along with this research by this point in the season, we believe some important progress has been made.

Critical to achieving research goals this year is a process for releasing from observer coverage by May 2014 vessels that are carrying EM as part of cooperative research "Track 1." Fixed gear organizations have emphasized this point for months and cannot understand NMFS reluctance to facilitate this essential component. We ask the Council's support in recommending NMFS issue releases to EM cooperative research vessels by the May selection period.

ALFA also asks that the Council establish an EM Workgroup as an extension of the EM ad hoc working group to advance and more fully integrate the cooperative research effort with the Council process. We ask that the EM Work group include representatives from fixed gear organizations, IPHC, Archipelago Marine Research, Saltwater, AFSC, other interested stakeholders, and the Council. Because most of the industry representatives are also commercial fishermen, we ask that named alternates to appointed committee members be allowed and that the first meeting of the workgroup occur in early May.

In developing a charge to the EM Workgroup, we ask that the Council focus the group on developing the context to support EM integration rather than focusing on the technology to be used. EM technology is evolving along with all technology, a trend that will no doubt continue. The context that supports EM integration, including deployment strategies, field services, on-board procedures,

performance standards and data review, should be sufficiently robust to allow the technology to be updated on an ongoing basis.

We also ask that the workgroup be tasked with considering fleet compatibility when developing EM approaches. Clearly the EM approach that works in one fishery or on one class of boats may not be suited to another fishery. Fishery specific management needs, along with fleet physical and operational characteristics, are an essential part of developing the EM integration context.

Finally we believe the EM workgroup should be tasked with identifying a process that synthesizes the four cooperative research “tracks” into a document that includes a timeline, milestones, and decision points for the Council related to integrating an operational EM program for the fixed gear fisheries. Our expectation is that the document outlining this process would be presented to the Council at the June 2014 meeting.

In sum, we believe some important progress has been made toward integrating EM with the observer program but there is much work to be done and we ask that Council’s support in expediting this process. Specifically, we ask that the Council recommend NMFS provide observer releases to vessels carrying EM as part of the cooperative research “Track 1” by May 2014; we ask that an EM Work group be established as an extension of the ad hoc working group; and, finally, we ask that the Workgroup be tasked with identifying alternative approaches to integrating EM and synthesizing these approaches into a decision document for the Council by June 2014 that defines an integrated and operational EM program.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Behnken".

Linda Behnken  
(Executive Director)