

March 30, 2014

North Pacific Fishery Management Council
605 West 4th Ave., Ste 306
Anchorage, AK 00501

Dear Chair Olson and Members of the Council

Re: Observer program and EM Cooperative Research

The undersigned fishing organizations request your support in securing observer releases for vessels participating in the 2014/15 Electronic Monitoring (EM) Cooperative Research.

In June 2013 you requested NMFS “explore ways to provide vessel owners and operators with incentives to participate in the [EM] pilot project in recognition that vessel owners and operators incur some costs and inconveniences in complying with NMFS’ protocols for installing and maintaining EM equipment.”¹ In a letter dated September 13, 2013 NMFS responded that the requested incentive would be provided by moving identified EM pilot project vessels to the “no selection” pool. In December, January, February and March fixed gear representatives met with NMFS to identify Cooperative Research priorities; at each meetings industry members stressed the importance of providing observer releases to vessels participating in the EM cooperative research by the season opening. In February, when industry members were advised releases would not be available for the first selection period, fixed gear representatives committed to finding EM volunteers regardless, but with the expectation that a process for observer releases would be in place by the May selection period. ALFA, Kachemak Bay Fisheries, SEAFA, FVOA and NPFA were successful in finding volunteers and seven EM systems are currently deployed on fixed gear boats with more pending for April and May.

On March 26th we learned that NMFS has identified a process for soliciting EM volunteer vessels and providing observer releases to these vessels, but that the selection/release process will not occur until July, at the earliest. Securing volunteers this spring and observer releases for these volunteers went hand in hand; the cooperative research will be significantly compromised if NMFS fails to provide observer releases for the May/June selection period. May/June volunteers will be unlikely in the continued absence of anticipated observer releases, and by July, most of the fleet will have caught all or most of their quotas. In short, the 2014 research season will be curtailed.

The confidence of the fixed gear industry in the “cooperative” part of this research becomes difficult to maintain in the absence of follow through on aspects critically important to industry participants. We understand NMFS/AFSC is hesitant to provide releases to selected vessels because of the introduction of potential bias, but given the existing release process and the very small number of additional vessels released in exchange for carrying EM, that concern seems over-stated. We have asked NMFS to reconsider this process, and we ask your support in urging them to commit to providing observer releases to EM cooperative research vessels by May 2014.

¹ NMFS letter to NPFMC, September 13, 2013. Signed by Pete Jones for James Balsiger

Thank you for your timely attention to this issue.

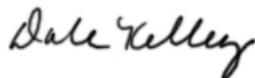
Sincerely,



Linda Behnken
Alaska Longline Fishermen's Association



Brian Lynch
Petersburg Vessel Owner's Association



Dale Kelley
Alaska Trollers Association



Malcolm Milne
North Pacific Fisheries Association



Peggy Parker
Halibut Association of North America



Tom McLaughlin
Seafood Producers Cooperative



David Polushkin
Kachemak Bay Fisheries



Kathy Hansen
Southeast Alaska Fishermen's Alliance