

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-4 ~~Observer~~ Program

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Linda Behnken	ALFA
2	Julianne Cerry	PVOA
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person " to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

September 27, 2011

Mr. Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: Draft Regulatory Amendment to Modify Monitoring and Enforcement Requirements in the BSAI Freezer Longline Fleet

Dear Chairman Olson,

The Observer Providers in the North Pacific Groundfish Observer Program have serious concerns about the draft Regulatory Amendment to Modify the Monitoring of the BSAI Freezer Longline Fleet. Alternatives 2, 3, and 4 propose a range of options including significant increases in total number of observers needed to cover the longline fleet, and unsustainable increases in the level of certification required for that same coverage. If adopted, several of these proposed options will lead to a severe shortage of qualified observers, which will in turn leave vessels unable to fish.

Both Alternatives 2 and 4 include language that would require most, if not all, freezer longliners to carry a single lead level 2 observer at all times. The document preparers then suggest that getting an observer from training to the point of certified lead level 2 is a quick and easy process. In fact, it currently takes multiple deployments of 75-90 days to get a person the requisite 60 sampling days, 60 sampled sets, and two completed deployments. Moreover, because under these proposed alternatives newly trained observers could not get their fixed gear experience on freezer longline vessels, our only option to get new observers certified as fixed gear leads would be to deploy them on pot and fixed gear catcher vessels. These boats are typically active two months out of the year, first in January and again in September. Only a handful of observers would then get their 60 sampled sets within a calendar year. Realistically, the majority of observers would need two years observing on those other gear types before they could qualify for a freezer longliner assignment. And, the experience gained on these other vessels, fishing various gear types, will do little to enhance their preparation for the work observing on freezer longliners

Our comments and objections to these proposed changes are not based on projections; rather they come from years of experience trying to maintain a pool of lead level 2 observers. Prior to the formation of the Voluntary Freezer Longliner Cooperative many vessels fished both open access and CDQ over their fishing year. The seasons were truncated by smaller quotas and a larger fleet, so many boats fished with a level 2 lead for most, if not all of their fishing days. As a group, we managed to provide level 2 leads when requested, but not without a great deal of hand-wringing. The providers were only able to maintain the numbers of leads required because we had a number of freezer longliners that didn't have CDQ who could carry non-lead observers. Those observers were then able to gain experience for certification as fixed gear

leads. We also had the option to place a non-lead as a second observer during CDQ fishing. Without those options under the proposed alternatives the providers will not be able to create enough replacement leads.

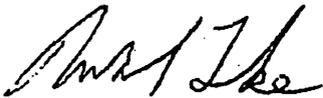
Currently, under the newly formed voluntary freezer longliner cooperative, and with the increase in quotas, much of fleet will see 9-12 months of fishing. Many of these boats make 30-40 day trips, so contractors find that after two trips an individual observer almost always needs to be replaced to avoid exceeding their 90 day limit. One freezer longliner will then need 4-6 observer deployments to provide a year of coverage. With 32 vessels in the fleet, option 2 will require up to 200 individual deployments of level 2 leads in a calendar year. With the current numbers of certified fixed gear leads, the providers can cover the first few months of fishing. However, without means to certify new leads we will quickly deplete our available corps of leads. The suggestion that this requirement will come at no significant cost, does not consider the fact that boats will be tied to the dock due to lack of level 2 leads.

Finally, we have a fundamental argument with the need for the most experienced level of certification for an observer who is onboard a vessel with a scale. As compared to an observer working on a trawler, an observer monitoring fixed gear catch already brings back more accurate data because more individual fish are counted and weighed than can be counted on a trawler. With the addition of the scale the total weight of fish brought onboard will be more accurately recorded. The current structure of the training class for new observers includes instruction on how to work on vessels with these scales. We are then advocating that the Alternative 2 language should be changed to: *The vessel must carry one observer on board for 100 percent of fishing days.*

In closing, we want to reemphasize that any requirement to have a single lead level 2 observer at all times will very quickly deplete the pool of qualified observers to cover the freezer longline fleet and will ultimately prevent the fleet from fishing its quota.

Sincerely,

Michael Lake



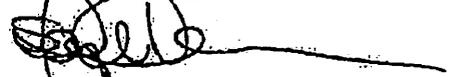
Alaskan Observers Inc.

Bryan Belay



MRAG Americas Inc.

Stacey Hansen



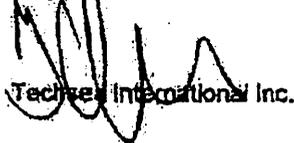
NWO, Inc

Darren N. Stewart



Saltwater Inc.

Troy Quinlan



Techsea International Inc.