

# North Pacific Fishery Management Council

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October 19, 2011

Dr. Doug DeMaster, Research Director  
AFSC/TSMRI Auke Bay Laboratory  
17109 Point Lena Loop Road  
Juneau, AK 99801

Dear Dr. DeMaster:

In October 2010, the North Pacific Fishery Management Council (Council) took final action to restructure the observer program, in order to improve what is already a largely successful data collection program. We are writing to request the agency's support to help facilitate the Council's action, specifically with regard to the future development of electronic monitoring (EM) systems as an additional tool for fisheries monitoring.

In October 2011, the Council reviewed the draft proposed rule and regulations developed by NMFS to implement the Council's observer restructuring action. As part of this action, the Council received an Observer Advisory Committee (OAC) report, which provided recommendations for improvements to the draft rulemaking package. At this meeting, the Council was also made aware that the OAC was briefed by Martin Loefflad of your staff, on an internal AFSC request for 2012 funding for EM, as part of the overall FMA implementation plan for the restructured observer program. We are writing to support this funding request, which will further one of the Council's highest priority actions.

The Council recognizes that implementation of most, if not all, of its conservation and management objectives require timely, reliable, and scientifically valid data. The primary mechanism for collecting these data and monitoring our fisheries is through the deployment of trained fisheries observers, and this remains the focus of the Council's action to restructure the current program. However, the Council selected a preferred alternative that restructures the observer program for all vessels and processors that are determined to need less than 100% observer coverage in the Federal fisheries, including all previously uncovered sectors such as commercial halibut vessels and groundfish vessels less than 60' length overall. In recognition that electronic monitoring may be a viable alternative for several of the small boat sectors, specifically those that are not constrained by prohibited species catch limits, the Council approved a motion to develop EM as a potential tool for fulfilling observer coverage requirements for specified sectors, with the intent that it be in place at the same time as the restructured observer program.

Because real-time data is not required for catch accounting in the halibut and sablefish IFQ sectors, the primary monitoring need is catch and catch composition, to complement the existing IPHC dockside monitoring program. Thus, in coordination with AFSC staff, the Council has identified the small boat (40' to 57.5' LOA) IFQ sector as a potential, initial sector on which to focus operationalizing EM in the North Pacific. The Council recognizes that the scope of EM may be limited in the initial year(s), but views the potential integration of EM in the long-run as an independent tool in the research plan.

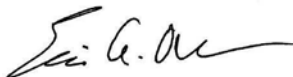
In October 2011, the Council also received a presentation from industry (Alaska Longline Fishermen's Association) on the EM pilot project they are conducting, in coordination with NMFS AFSC, under a grant from the National Fish and Wildlife Foundation. This project builds on previous work of industry, the AFSC, and the IPHC, focusing on how to operationalize cameras for use on small longline boats in Alaska. The grant cycle is 2011 – 2012, and findings from the project should be available by the fall of 2012. Industry has developed an approach in terms of logistics and hardware, in order to help facilitate some operational capacity for implementation in 2013, which is the scheduled first year of observer deployment under the restructured observer program. The Council encourages this effort, and would like NMFS to invest in that capacity by dedicating funds to support its further development.

To demonstrate the Council's commitment to evaluating the use of EM as a tool for biological monitoring, the Council approved a motion in October 2011 which, among other actions, supports dedicating funds from the ex-vessel value fee authorized under Section 313 of the Magnuson-Stevens Act to fund EM systems. This motion also urges NMFS to make as many EM systems available as possible to vessels in these specified sectors, within identified data, budgetary, and logistical constraints, to advance the Council's goal of integrating EM into the observer program as an alternative tool.

The Council would also benefit from understanding the allocation of National Observer Program (NOP) funds among the various regions, as well as the amount dedicated to the direct management of the observer program and the development of electronic monitoring. Understanding the financial aspects of the observer program will assist the Council as it considers the balance between NMFS contributions to observer programs and the North Pacific fishing industry's contribution through the 1.25% ex-vessel value fee approved by the Council under the observer restructuring action. The 2010 National Observer Program report indicates that the North Pacific observer program received \$6.6 million in NMFS funding in FY 2010, and it seems reasonable that a portion of this future funding be dedicated to EM, to ensure that the capacity is available within NMFS in the near future. Any information you can provide as to the rationale for, and the allocation of, current NOP funding would be appreciated.

In sum, please consider the Council's interest in EM development, the practical need for this tool in the small boat fleet, and the great potential it may hold for future monitoring, when evaluating and prioritizing the allocation of observer funds within NMFS, specifically in FY 2012. We hope that the design of the new observer program, in tandem with a developing EM tool, will serve to reduce sources of bias that jeopardize the statistical reliability of catch and bycatch data and fill data gaps by including sectors that have not been previously subject to observer requirements. Please contact me, or our Executive Director, Mr. Chris Oliver, if you have any questions in this regard.

Sincerely,



Eric A. Olson  
Chair

cc: Mr. Eric Schwaab  
Dr. Jim Balsiger  
Mr. Martin Loefflad  
Mr. Glenn Merrill