



March 31, 2013

Mr. Dan Wolford, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220

**RE: Agenda Item D.7 Trawl Rationalization Trailing Actions – Electronic Monitoring Regulatory Process and B.7 Future Council Meeting Agenda and Workload Planning.**

Dear Chairman Wolford and Council Members:

I would like to commend the work of Council staff, especially Mr. Jim Seger in organizing a successful workshop on the potential use of electronic monitoring technologies in the Pacific groundfish IFQ fishery. Not only was the workshop well attended, but the significant preparatory work allowed for a collaborative and open discussion of some of the most pressing issues and questions to be addressed before the Council can move forward with refining the fishery's monitoring program. With the understanding that the Council will be reviewing the outcomes of the monitoring workshop and recommending next steps both for research and approval of a possible regulatory amendment process, Environmental Defense Fund (EDF) would like to provide the following comments to inform your discussion.

EDF is a non-profit organization with over 750,000 members and as you know, we have been involved in the development of the West Coast groundfish catch share program since its inception in 2003. From the outset we have worked closely with stakeholders to ensure that the program meets conservation, social, and economic objectives. As you will recall, during the November 2012 Council meeting, the Groundfish Advisory Subpanel (GAP) identified electronic monitoring (EM) as its highest priority for trailing actions, stating that EM would likely reduce program costs and increase operational flexibility. **EDF agrees that EM should remain a high priority, not only for the reasons highlighted by the GAP, but also to ensure this fishery is able to maintain a high level of accountability and robust collection of fisheries data moving into the future.** We are concerned that as operational costs mount and as agency resources are further constrained the fishery will either see a reduction in the diversity of participating vessels and ports, or a reduction in the 100% monitoring currently in place. By allowing for flexibility in the monitoring tools employed for compliance and catch accounting purposes, the Council will help to ensure monitoring is not only cost-efficient, but also employs the best, most effective tools to meet monitoring objectives and standards.

Reviewing the Year-at-a-Glance Summary, Agenda Item F.4.a Supplemental Attachment 3 from the March 2013 briefing book, I note there is no mention of electronic monitoring after the April 2013 Council meeting. Although future work will be determined by decisions made at the April meeting, the timeline adopted in June 2012 and refined during the February EM workshop (PFMC EM Workshop Agenda Item F Attachment 1 – Draft Calendar) leave very little room for

slippage. As the timeline currently stands, should the Council decide at this meeting to move forward to scope a regulatory amendment, the earliest such an amendment would come into effect is January 2016. **We therefore strongly encourage the Council to consider the various steps necessary to continue progress on this issue (including scoping, review of ongoing research, and development of alternatives to be analyzed) and take action under agenda item B.7 Future Council Meeting Agenda and Workload Planning to include EM as one of the trailing actions addressed during upcoming Council meetings.**

One of the recommendations discussed during the February workshop was the need to establish a work group focused specifically on EM. **Given the importance of optimizing the Council's time and resources, EDF supports the recommendation to convene a small EM working group, with those appointments occurring during the June Council meeting.** Establishing a working group will help ensure full scoping is carried out this summer, contribute to the further development of the EM strawmen, identify additional options, standards, or considerations for EM deployment, and provide guidance on future research priorities for the various sectors of the groundfish IFQ fleet.

The Council and Pacific stakeholders are fortunate to have the Pacific States Marine Fishery Commission (PSMFC) guiding research in the application of EM for this fishery. As was pointed out during the recent EM Workshop, this relationship is rare and one that should be capitalized on. **It is our hope that the Chair, or a designated representative, of the Scientific and Statistical Committee (SSC) can be appointed to serve as an official liaison with PSMFC.** This will ensure Council concerns and needs are taken into account in the deployment of gear and analysis of EM data for the 2013 field season. Increased collaboration may also help streamline or facilitate SSC consideration and review of study results.

Thank you for your time and consideration of these comments. We hope they are helpful as you consider the importance of advancing the use of EM tools in this fishery and prioritize upcoming work for the Council.

Sincerely,

A handwritten signature in purple ink, appearing to be 'SJ', written over a light blue grid background.

Shems Jud  
Deputy Director, Pacific Oceans Program  
Environmental Defense Fund