



November 4, 2011

Mr. Dan Wolford, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101□
Portland, Oregon 97220

RE: Agenda Item E. 7, Trawl Rationalization Trailing Actions

Dear Mr. Wolford,

We are writing today to ask the Pacific Fishery Management Council (PFMC) initiate action to eliminate the requirement that Mothership Catcher Vessels (MSCVs) be required to have observer coverage while participating in the Whiting Mothership fishery. After one year of operating under the new Amendment 20/21 Catch Shares program, opportunities exist to reduce the cost of the program, both to the government and the industry. One of these opportunities is the elimination of 100% observer coverage on MSCVs. We request this action by the PFMC for the following reasons:

1. **Reduce the cost of the Trawl Catch Shares program.** Currently the federal government subsidizes the at-sea cost of observer coverage at 90% of the actual cost when vessels are at sea. For the 2011 Whiting Mothership fleet, this equates to approximately \$152,000 (400 at-sea days at \$380/day). As the NMFS contemplates reduction in federal funds to cover a portion of at-sea observer costs and what the observer cost subsidy will be for 2012, eliminating observer coverage for the mothership will free up funds that can be used for the Shoreside trawl catcher vessel trips. Without the Federal contribution for observer costs, many of these fishing companies' operational expenses will exceed their gross income.
2. **Collection of accurate catch data from the MSCV fleet does not require observer coverage onboard the catcher vessel.** Review of the catch and discard data collected by the MSCV observers to date from the 2011 season indicate that documented discard events from the MSCV fleet are extremely rare and account for less than 1/10th of 1% of the harvest. Of over 1000 tows documented by the observers onboard the MSCV fleet, only 4 were over 10,000 pounds, and were due to mechanical failure of deck equipment. All

- tows were documented and recorded by the skipper in the logbook and in most cases the onboard observer asked the skipper to provide estimates of amount of these discard events.
3. **Tasks of an observer onboard a MSCV are minimal.** The source of harvest amount and species composition of the MSCV fleet comes from the two observers onboard the mothership processor vessel. This includes using a flow scale to determine and document the weight of the delivery and the accurate enumeration of any bycatch species such as rockfish or salmon. As documented by this year's fishery, the responsibilities of observers onboard MSCVs are very minimal. Their only task is to document any discard event if such an event occurs and provide an estimate of the amount of the discard event. And because these events are so few, the observer really has nothing to do while onboard a MSCV.
 4. **The captain documents any discard event.** All MSCV tows can be documented in the vessel logbook. This includes the start and stop time and location of all tows. Any fish discarded when the net is retrieved can be estimated and recorded by the captain. Even without an observer present on the MSCV, data regarding discards will be available to manage the fishery. We suggest that logbooks be a mandatory requirement.
 5. **We support a full-retention requirement.** As shown by the current year fishery data, discard events are extremely rare and account for very little tonnage. Requiring the fleet to deliver all fish caught is a reasonable requirement. Discards, when they do occur, happen when the codend has been filled beyond the point where it is disconnected from the intermediate portion of the trawl net, or the stuffing tube. Responsible fishing practices of a MSCV captain result in very little or no fish being spilled.
 6. **Overfished Rockfish species encounters are minimized due to the MSCV Cooperative Agreement.** As presented in our report to the PFMC this meeting on the results of the first year of fishing under the new cooperative regulations, the MSCV fleet has greatly reduced its encounter of rockfish bycatch species. This is due to provisions of the Cooperative's Bycatch Agreement.

When the PFMC made its final recommendations for the new trawl catch shares program, the NMFS indicated that reducing the cost of the new program was an objective and that one example of this savings would be to not require observers onboard MSCVs. We believe that cost savings can be achieved by eliminating the observer requirement and ask the PFMC to make this recommendation. We ask that such a recommendation be added to one of the PIE amendment packages moving forward for implementation in an expeditious manner.

Thank you very much for consideration of our request.

Sincerely,



Brent Paine