Ms. Dorothy Lowman  
Chair, Pacific Fisheries Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear Ms. Lowman,

As the Chair of the Pacific Fisheries Management Council (Council), I urge you to prioritize the adoption of a regulatory framework for the use of electronic monitoring (EM) as an economically viable substitute for human observers in the West Coast Groundfish Trawl Catch Share Program at this week’s Council meeting.

Since the catch share program was implemented in 2011, stocks have increased and bycatch has largely been eliminated thanks to improved personal accountability, a cornerstone of the catch share program currently achieved through 100% human observer coverage. Unfortunately, the cost of human observers is substantial and continues to grow each year. The National Marine Fisheries Service (NMFS) initially capped observer salaries at $350 per day, but today the average daily cost of an onboard observer has risen to roughly $450—36% above the national average\(^1\). Observer salaries exceed most crew member salaries and may constitute up to 10% of the gross earnings of small vessel operators. If the catch share program is to remain economically viable, the Council must work with NMFS to expedite the implementation of an EM program to reduce the cost of compliance monitoring.

The Council is clearly aware that the growing financial burden of human observers is unsustainable and has taken a number of steps towards developing an EM program to alleviate that burden, but final implementation of the program is not expected until January 2016. It is unclear why such a delay is necessary since NMFS has already endorsed the use of video cameras to meet monitoring and compliance needs in maximized retention fisheries\(^2\) and the two committees (GEMPAC and GEMTAC\(^3\)) tasked with evaluating the Council’s preferred alternatives submitted their final recommendations over six months ago.

I am aware that the committees’ recommendations are scheduled for review at this week’s meeting, and I urge the Council to take whatever steps necessary to adopt final recommendations for NMFS as soon as possible. It is critical that the Council expedite the implementation of EM in the Groundfish Trawl Catch

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\(^1\) NMFS Observer Programs Presentation to the Council Coordination Committee, April 10, 2014  
\(^2\) NMFS Policy on Electronic Technologies and Fishery-Dependent Data Collection, May 3, 2013  
\(^3\) Groundfish Electronic Monitoring Policy Advisory Committee (GEMPAC) and Technical Advisory Committee (GEMTAC)
Share Program to reduce the cost of compliance monitoring and increase profitability, particularly for our small boat operators.

Sincerely,

[Signature]

Peter A. DeFazio
Ranking Member
Committee on Natural Resources