



27 May 2014

Dorothy Lowman
Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

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Dear Dorothy,

PFMC

As the Council continues to consider approval of the various Electronic Monitoring (EM) EFP's currently under consideration, we would like to point out a number of questions that need to be answered and impacts that need to be addressed before Observer Providers and the Observer and Monitoring programs are in a position to maintain required coverages on the West Coast in 2015.

- 1) What level of observer coverage will vessels participating in the various EM EFP's be required to take? Observer coverage in the EM EFP's is currently set at a level somewhere between zero and 100%. This leaves providers able to wonder but unable to plan, and we imagine it leaves the Agency in much the same place. Since each EFP might end up with different coverage requirements, the sooner the Council can get this question sorted out the better.
- 2) How many vessels will be permitted to participate in each EFP? At one time a limit of six boats per permit was being discussed, but that's apparently gone away. Again, not knowing how extensive participation may be makes any planning impossible.
- 3) It is remarkable that the EFP proposals fail to mention Catch Monitoring, since all deliveries made by EFP participants—whether or not a given trip is observed—will have to be monitored.

The Catch Monitoring requirement could turn out to be particularly onerous in California. Fishing effort in California is light enough so that it has been a challenge to maintain the employment of observers who both ride boats and monitor offloads. If a number of vessels in Central and Southern CA are part of the EM EFP in that area and are subject to something less than 100% observer coverage, then the number of employed days available will be reduced from where it stands now. This will make it more difficult than ever to provide observer and monitor services in that area.

Will the Council make EFP participants responsible for ensuring monitors are in place before offloads begin? Or will this responsibility rest with First Receivers?

- 4) In determining observer coverage levels for the various EFP's, the Council should consider that any coverage requirement of less than 100% will result in the loss of scientific data that the Agency needs in order to evaluate the effectiveness of EM. To gather this information from

unobserved trips, the Observer Program will have to design an approach to gather this data during offloads. Catch Monitors, as they are currently trained, do not gather this kind of data. If additional personnel are required to gather the data, the Council will need to determine who will be responsible for ensuring they are present and how they will be paid for.

In the rush to put EM into place, it seems a number of important details have gone unaddressed. Taking for granted that providers will figure out how to handle whatever observing and monitoring needs arise from implementation of the various EM projects before the Council is a mistake—instead, the effects should be acknowledged and addressed as part of the EFP approval process.

Sincerely,

ALASKAN OBSERVERS, INC.

A handwritten signature in black ink, appearing to read "Michael Lake", written over the typed name.

Michael Lake
President