NMFS NORTHWEST REGION REPORT ON MISCELLANEOUS CLARIFICATIONS FOR
AMENDMENT 20: TRAWL RATIONALIZATION

TRACKING AND MONITORING

The current provisions as listed under section A-2.3.1 Tracking, Monitoring and Enforcement in the Council's current preferred alternative analysis (see Agenda Item E.10, Attachment 2) specify the methods for the following components of the tracking and monitoring program: discarding by the shoreside sector; at-sea catch monitoring for the shoreside sector; catch tracking mechanism for the shoreside sector; cost control mechanisms for the shoreside sector; and program performance measures for the shoreside sector. In NMFS's initial discussions regarding the design and implementation of the tracking and monitoring program, the need for flexibility when designing this aspect of the TIQ program became apparent. Therefore, we would like to confirm that the Council's intent was to provide NMFS sufficient flexibility in the design and implementation of the program to achieve the goals and objectives of the trawl rationalization program. The tracking and monitoring provisions of the TIQ program are essential to its success and although NMFS believes that current suite of Council recommendations provide a strong foundation, there are likely refinements that will be necessary to achieve the overall goals of the program. For example, how the observer program is structured and implemented will need to be designed within the recommendations of the Council's and within the constraints of NMFS staffing, timing and budgets. NMFS is also interested in exploring the efficacy of human observers and electronic monitoring as a means to achieve the monitoring requirements currently recommended in the Council's preferred alternative.

In addition, NMFS would like to confirm that, if approved, we have the flexibility to implement Amendment 20 either through a series of rule makings, or in a single rule making process. At this time, we believe that a series of rulemakings is the more likely path forward.

Because of these issues and others that may be discovered during implementation, NMFS requires this flexibility to design the specifics of the tracking and monitoring program.