



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
1315 East-West Highway
Silver Spring, Maryland 20910
THE DIRECTOR

Mr. Dan Hull
Chairman
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, AK 99601

NOV 27 2017

Dear Mr. Hull:

Thank you for your October 13, 2017, letter regarding the electronic monitoring (EM) program in Alaska. You raised a number of important issues regarding the future deployment and monitoring approach described in the Draft 2018 Annual Deployment Plan presented to the Council in October 2017. In the Draft ADP, we proposed 30 percent pre-trip selection to monitor the EM fleet in 2018 and discussed our intent to implement 100 percent monitoring of trips in 2019, with 30 percent post-trip selection.

The post-trip selection method would require that all trips be monitored with EM; the vessel operator would be notified after the trip via the Observer Declare and Deploy System if the trip was selected for review. Monitoring all trips and using a post-trip selection process to select trips for video review would provide a mechanism to avoid monitoring bias. This approach has been discussed with the Council's EM Work Group at several meetings over the past year. However, given that the EM program has been voluntary during pre-implementation the past 2 years, and in order to encourage greater industry participation, the EM Work Group opted for the 30 percent pre-trip selection approach instead for 2018. Now that the EM program is fully implemented, we believe it is necessary to remove any potential bias in order to ensure the highest data quality possible in this new data collection program.

As noted in your letter, there are a number of logistical and cost considerations with post-trip selection related to handling hard drives and data storage. Industry participants on the Council's EM Work Group have also raised concerns that monitoring all trips, particularly on vessels fishing with pot gear, potentially impacts operational costs and profit margins due to the extra time required for catch handling as part of the EM program. For example, extra time is required to clear the sorting table between each pot haul to ensure that video reviewers have an accurate count of all retained and discarded species. This is less likely to affect longline vessels, because they handle most fish individually.

We acknowledge that further investigation will be beneficial to understand the trade-offs and the logistical issues associated with post-trip selection, especially for pot vessels. In 2018, we will work with EM service providers and vessel operators using pot gear to determine the amount of time required to sort catch on EM-monitored vs. non-EM-monitored trips. We will also examine the costs of recording video on 100 percent of trips and developing efficient hard drive delivery protocols for all gear types. We plan to present the 2017 Annual Report to the Council in June 2018, which will include information and analyses of the 2017 EM pre-implementation program, including any potential signs of bias in the EM fleet. Combined with results from any 2018 field



work, this information would be used to develop appropriate EM deployment approaches in 2019. Given that previous annual reports have shown little evidence of an observer effect in the pot fleet, a different approach for pot vessels might be appropriate. We will continue to work with the EM Work Group and provide opportunities for the Council to review the Annual Report and the Annual Deployment Plan to evaluate gear-specific coverage levels.

I appreciate your comments regarding the Alaska EM program. The Council's EM Work Group has accomplished a great deal over the past few years, and we look forward to further improvements to the program in the future. If you have further questions about EM deployment in Alaska, please feel free to contact Brett Alger, NMFS Office of Science and Technology, at (301) 427-8217.

Sincerely,



Chris Oliver
Assistant Administrator
for Fisheries