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November 30, 2017

Mr. Dan Hull, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

RE: 2018 Observer Program Annual Deployment Plan

Dear Chairman Hull, Dr. Balsiger and Council Members:

Thank you for accepting comments for Agenda Item B3 NMFS Management Report. We write to stress the need for higher observer coverage in the Gulf of Alaska (GOA) partial coverage trawl fleet. We understand that the final 2018 Observer Program Annual Deployment Plan (ADP) will not be available to the public until the beginning of the December North Pacific Fishery Management Council (Council) meeting, so our comments are based on the draft plan and discussions from the October meeting.

According to the draft ADP, budgeted observer days would be apportioned across gear types in the partial coverage category, with NMFS opting for a strategy of 15% across all gear strata plus optimization based on discarded groundfish and halibut and Chinook prohibited species catch (PSC). This would result in trawl and tender trawl strata having 19% and 15% coverage, respectively.¹ The Council supported a strategy of optimization based on groundfish discards and halibut PSC, which raises the trawl coverage to 22% and decreases the tender trawl coverage to 12%.² While we support any increase in trawl coverage, in both scenarios the low observer coverage expected for bottom trawl catcher vessels is not enough.

Higher observer coverage is needed to meet the conservation and management priorities of improving bycatch estimates of the high-volume/high-discard trawl fisheries, managing bycatch caps set for prohibited species including Chinook salmon and Pacific halibut, and monitoring and managing commercially important species including Pacific cod. One consequence of lower observer coverage is the 'observer effect', which is exhibited by shorter trips, fewer species caught, and/or smaller catch landings.³ The observer effect is a hurdle to accurate catch accounting and fishery monitoring: if the observed trips are different than the unobserved trips, the catch data may not reflect reality. This

¹ NMFS. 2017. *Draft 2018 Annual Deployment Plan for Observers in the Groundfish and Halibut Fisheries off Alaska*. National Oceanic and Atmospheric Administration, 709 West 9th Street, Juneau, Alaska, 99802.

² http://legistar2.granicus.com/npfmc/meetings/2017/10/965_A_North_Pacific_Council_17-10-02_Meeting_Agenda.pdf, Council Summary of the 235th Plenary Session

³ Alaska Fisheries Science Center and Alaska Regional Office. 2017. *North Pacific Observer Program 2016 Annual Report*. AFSC Processed Report 2017-07, 143 p., AFSC, NOAA, NMFS, 7600 Sand Point Way NE, Seattle, WA 98115.

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discrepancy can affect NMFS's ability to manage any necessary in-season closures due to reaching or exceeding PSC bycatch caps.

Accurate species counts are also important for monitoring full stocks from year to year. The GOA Pacific cod stock is at a record low⁴ which will have cascading effects across all GOA fisheries. According to the draft 2017 GOA Pacific cod stock assessment, the recommended Acceptable Biological Catch (ABC) for 2018 is 18,000 tons, a 79.6% decrease from 2017's ABC of 88,342 tons.⁵ Fishermen may choose to fish more heavily for other trawl targets or switch from pot to trawl, if able, to make up for that lost revenue. However, any increased effort is likely to increase the volume of bycatch. More observer deployment will be necessary on trawl vessels to monitor possible shifting efforts across fisheries and to account for catch and bycatch species composition.

Healthy fisheries and successful fishermen need accurate data for fisheries management through changing conditions and variable stock conditions. Oceana advocates for full coverage of the GOA trawl fleet, a strategy for which the Council has already written a discussion paper.⁶ Moving forward, a separate management strategy of full coverage in the GOA trawl fleet should be reintroduced by the Council. Because the number of observer days is cost prohibitive, the Council initiated an analysis to consider increasing the observer fee.⁷ Due to the time it takes to implement a regulation change, increased available funding through an increased fee would likely not be applied to an ADP until 2021 at the earliest,⁸ therefore there is an urgency to the Council completing this analysis. We request that the Council prioritize funding solutions to increase observer coverage as we move into 2018 and plan for 2019.

Sincerely,



Susan Murray
Deputy Vice President, Pacific
Oceana

⁴ Barbeaux, S. J. 2017. Gulf of Alaska Pacific cod NPFMC PowerPoint presentation. NPFMC, presented October 2, 2017, Anchorage, AK.

⁵ https://www.afsc.noaa.gov/refm/stocks/plan_team/2017/GOApcod.pdf

⁶ <https://www.npfmc.org/goa-trawl-bycatch-management/>

⁷ http://legistar2.granicus.com/npfmc/meetings/2017/10/965_A_North_Pacific_Council_17-10-02_Meeting_Agenda.pdf, Council Summary of the 235th Plenary Session

⁸ Observer Advisory Committee. 2017. Options to address low selection rates in partial coverage. North Pacific Fishery Management Council, Anchorage, AK.