



UNITED FISHERMEN OF ALASKA

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February 27, 2013

Eric Olson, Chairman
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Dear Chairman Olsen and Council Members,

United Fishermen of Alaska is the largest statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. On behalf of UFA's membership I would like to submit the following comments on electronic monitoring (EM) for Council consideration during the April NPFMC meeting.

UFA members have consistently supported integrating EM as part of the Observer program in order to achieve cost effectiveness and minimize the impact of at-sea monitoring. We ask the Council to re-focus NMFS on achieving previously identified priorities and fishery specific monitoring objectives for EM as a component of an integrated at-sea monitoring program. We believe a focused effort can result in a workable program by 2014 and urge the Council and NMFS commit to this goal.

Adequately funding EM will be essential to achieve this goal. The current approach of opportunistically funding EM from grants or cooperative research funds does not provide the funding stability, focus, or adequate resources to develop EM in a timely fashion. We request a portion of the fees collected under the restructured observer program be dedicated for EM. This is consistent with the goal of having EM be an integrated component of the observer program and will provide a tangible step forward in achieving this goal.

UFA also recommends the Council consider the using EFP process to provide the flexibility needed to fine-tune the integration of EM and identify the necessary performance standards and regulations. NMFS has previously identified the two year process to identify and implement regulation governing EM as a significant barrier implementing an EM alternative in a timely fashion. The EFP process can be completed more quickly and provide the necessary framework under which to identify and develop formal regulations.

In closing, the success of the Canadian system and various pilot programs have shown existing EM technology is capable of providing reliable estimates of catch and catch composition if monitoring objectives are identified and performance standards articulated. There have been several side-by-side comparisons of EM and human observes which further document the ability of EM to achieve specific objectives associate with at-sea monitoring. What is needed in Alaska is a focused effort to implement EM as part of the observer program in a timely manner.

Sincerely,

Julianne Curry
Executive Director



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February 27, 2013

Honorable Lisa Murkowski
United States Senate
709 Hart Senate Building
Washington DC 20510

Honorable Don Young
U.S. House of Representatives
2111 Rayburn House Office Building
Washington, DC 20515

Honorable Mark Begich
United States Senate
144 Russell Senate Building
Washington DC 20510

Dear Senator Murkowski, Senator Begich, and Representative Young,

At the Feb 2013 UFA Board meeting, our members reviewed your December 10, 2012 letter to Acting Secretary Rebecca Blank regarding the restructured North Pacific Observer program and electronic monitoring (EM).

UFA members have consistently supported integrating EM as part of the Observer program in order to achieve cost effectiveness and minimize the impact of at-sea monitoring on small boats. Delay by NMFS in providing this alternative is causing unnecessary impacts to Alaska's community based fleet.

Your interest and involvement has highlighted the need and urgency in developing EM as an integrated component of the restructured observer program. We wish to express our sincere thanks for your involvement and hope you continue to monitor this important issue.

Sincerely,

Julianne Curry
Executive Director