



Pacific Fishery Management Council

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Philip Anderson, Chair | Charles A. Tracy, Executive Director

September 18, 2019

Mr. Randy Fisher, Executive Director
Pacific States Marine Fisheries Commission
205 SE Spokane Street, Suite 100
Portland, OR 97202

Dear Mr. Fisher:

The Pacific Fishery Management Council (Council) is asking the Pacific States Marine Fisheries Commission (PSMFC or Commission) for help in implementing a successful and sustainable electronic monitoring program (EM) for the West Coast groundfish trawl fishery. We want to acknowledge the superior work of the Commission's staff during the formative years and the initial development of the EM program particularly as it relates to the video review and data storage portion of the program.

On September 14, 2019, the Council met to discuss the issues associated with implementing the National Marine Fisheries Service (NMFS) final rule relative to the EM program. The EM regulatory program is scheduled to be effective on January 1, 2021. The Council's Ad Hoc Groundfish Electronic Monitoring Policy Advisory Committee (GEMPAC) and the Ad Hoc Groundfish Monitoring Technical Advisory Committee (GEMTAC) met to discuss several critical pieces of information that affect implementation of the EM program. The GEMPAC provided a report to the Council that identified some overarching concerns and recommendations to NMFS intended to address some of those concerns (Agenda Item H.3.b, Supplemental GEMPAC Report 1).

Specifically, the GEMPAC note:

“The future cost of the program is of primary concern, given the original goal of creating a cost effective monitoring option. The current implementation model for EM under exempted fishing permits (EFPs) allows for Pacific States Marine Fisheries Commission (PSMFC) to conduct video review and data storage, while the regulatory program will require EM implementation to occur under a third-party provider model, where private companies would provide video review and data storage services. The costs under the regulatory program are expected to increase significantly for both the industry and for National Marine Fisheries Service (NMFS).”

The vessel owners will be responsible for paying the costs associated with video review and storage beginning in 2021. Maintaining the current cost of the third-party review and data storage is critical to the future success and viability of the EM program. In 2017, the Council requested that NMFS examine the use of PSMFC as a sole provider to conduct the video review for the EM program. NMFS subsequently made a determination that a third-party review process was required under the new rule.

In many ways, the Council believes that the future of the program may well depend on finding a pathway by which the Commission can continue to provide the same service for a similar cost as it has done in the past. We understand that there are complications associated with finding the appropriate mechanism for the vessel owners to pay for their part of the program. However, we are asking the Commission to make every effort to find a pathway that will afford the Commission the opportunity to continue providing EM review and data storage services for the industry as it has done in the past.

We appreciate all the work PSMFC has done to help the Council develop a cost effective and flexible EM program on the West Coast and look forward to continued collaboration. Please do not hesitate to contact me or Council Staff Officer, Mr. Brett Wiedoff, if you have any questions.

I look forward to hearing from you.

Sincerely,



Philip Anderson
Pacific Council Chair

BLW:rdd

Cc: Pacific Council Members
Mr. Chuck Tracy
Mr. Dave Colpo
Dr. Dave Hanson
Mr. Brett Wiedoff