



## **Alaska Trollers Association**

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November 18, 2012

Senator Lisa Murkowski  
U.S. Senate  
Washington, D.C.

Dear Senator Murkowski:

Attached you should find an urgent letter from 14 organizations asking for relief from the soon to be released NMFS observer program. Our sense of urgency arises from the fact that NMFS is scheduled to publish a final rule in early December and implement the observer program early in January 2013. The plan as currently written is totally unacceptable and will do tremendous harm to small business, with no net benefit to the resource. We ask for your help to remedy this situation STAT!

ATA represents hook and line salmon fishermen, many of whom also rely heavily on longline fisheries subject to this observer program. This historic pattern of diversification has played an essential role in the viability of small boat trollers and longliners in Southeast Alaska.

The vast majority of our vessels are under 50 feet and unable to house both onboard observers and crew. Work space on deck is also at a premium. Both the NPFMC and NMFS are well aware of these facts, yet the practical concerns of the small boat fleet have not been adequately vetted, much less mitigated. This despite the fact that we will be required to pay for the program. To add insult to injury, the cost of observer coverage will more than double - to \$1,000 per day!

Details are being trickled out to the public - some just two days ago! After three years of inquiry into the mechanics of the NMFS observer program, the agency very recently published a webpage with some explanatory information.<sup>1</sup> The terms of this program range from impractical to downright ridiculous and will make it nearly impossible for the small boat fleet to comply.

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<sup>1</sup> <http://alaskafisheries.noaa.gov/sustainablefisheries/observers/faq.htm>

NMFS touts the observer program as a conservation measure with a stated purpose to collect, *'the best available scientific information for managing these fisheries and developing measures to minimize bycatch.'* The conservation aspect is laughable considering they intend to reduce observer coverage on the trawl fleet, while dramatically increasing coverage for the 1,300 small fixed gear vessel owners who are responsible for less than 12% of the catch. The agency has also failed to take into consideration other, less onerous and/or costly, provisions that might achieve the same objectives.

Given the significant issues of reduced biomass and harvest allocation currently burdening halibut fishermen, combined with steeply rising business costs, it is highly likely that the NMFS observer plan will be the final straw for thousands of small business owners. This is further exacerbated for our troll fishermen, who continue to suffer deep Chinook quota cuts under the Pacific Salmon Commission. This is an untenable situation for our region, the state of Alaska, and U.S. economies.

Fortunately, you have the power to help remedy the situation for your constituents and their communities.

**ATA requests your immediate assistance to prevent NMFS from implementing its draft observer plan and deploying observers on vessels less than 57.5 feet. It is crucial that NMFS better engage the affected fleet; properly analyze the potential impacts of the rule; and, consider less costly and disruptive monitoring alternatives.**

Thank you in advance for your fast action on this matter. Feel free to contact me if I can provide additional information or assistance.

Best regards,

Dale Kelley  
Executive Director