

Opposition to RC192 in reference to Explanation section 4) *All boats will be required to install certified video surveillance to verify that all caught fish are retained.*

The anecdotal claims of chum discards among the fleet are unsubstantiated on the record, and there is no evidence that this occurs at any quantifiable level to support an electronic monitoring program.

Additional, claims of this behavior from 20-30 years ago reference an entirely different fleet and era of fishing, that is no longer relevant to today. Occasional bad behavior is something that occurs in ALL fisheries across the state at both the federal and state level. The amount of monitoring that would be required in order to discern bad behavior would be prohibitively expensive in terms of cost and resources to the state, and would need to be implemented among all fisheries.

I have spent the past four years standing up a voluntary electronic monitoring compliance program in a federal groundfish fishery, which has now passed final action at the North Pacific Fisheries Management Council (NPFMC) and is slated for regulatory implementation in 2025. NMFS Alaska Region has spent the past decade working to develop EM programs and has the existing infrastructure to develop and maintain these programs, and it was still an incredible challenge to get an effective program in place. To attempt to capture the kind of infrequent behavior as intended in RC192, 100% coverage monitoring would be required meaning footage from each fishing trip in entirety would need to be reviewed and subsampling would be insufficient. It should also be noted there is not a reliable and efficient means for speciating large quantities of salmon through video analysis yet.

To provide context for the magnitude of establishing a program like this, the summary cost analysis conducted through NPFMC analysis (Table 5-36) is provided and includes a breakdown of costs per vessel encountered during the first two years of our experimental permit. To stand up an electronic monitoring program, in the Area M fishery alone, would cost upwards of \$17,496 for the one time cost of purchasing and installing *systems only*, roughly in the range of \$3,919,104 for a fleet of 225 vessels. Then you would need to consider the suite of ongoing costs, roughly in the range of \$5,765 per vessel per year equating to a total of \$1.2M per year. None of these costs include the time and labor it will take Department staff to develop an effective program, and the immense amount of outreach and troubleshooting to get a program off the ground. Currently only approximately 18 out of 224 vessels have existing camera systems, and cost-sharing guidelines would need to be defined with the NMFS to use those systems in a non-federal program.

Table 5-36 Total costs and average per unit costs for the 2021 Trawl EM EFP. Numbers in parenthesis correspond to the level of participation and effort in the 2021 EFP. *Day is sum of estimated fishing days as reported in Table 5-10 and Table 5-18.

Ongoing costs	Total costs	Average per unit cost for 2021 EFP		
		CV (68)	Trip (1503)	Day* (4882)
1. Service Provider Fees and Overhead	\$188,559	\$2,773	\$125	\$39
2. EM Equipment Maintenance and Upkeep	\$86,832	\$1,277	\$58	\$18
3. Data Transmittal	\$5,720	\$84	\$4	\$1
5. Data Review	\$101,488	\$1,492	\$68	\$21
6. Data Processing and Storage	\$9,403	\$138	\$6	\$2
Total ongoing costs	\$392,002	\$5,765	\$261	\$80
One-time costs	Total costs	CV (15)	Tender (2)	
4. Equipment Purchases and Installation	\$276,653	\$17,496	\$7,106	

<https://meetings.npfmc.org/CommentReview/DownloadFile?p=e31b9c56-d3a4-4d1e-b621-b0b4bd892b5a.pdf&fileName=C3%20Trawl%20EM%20Analysis.pdf>