

To whom it concerns:

My name is Carter Hughes and I am a troller/longliner based out of Sitka, Alaska. I have a 37 foot troller that I use for salmon trolling and 8900lbs of SE sablefish IFQ and 3700lbs 2C halibut IFQ (2017 allocation). I currently fish my IFQs on a 41ft vessel that carries EM. It is possible that in the future I might fish some of my halibut IFQ on my vessel. I am addressing these comments to the OAC through, Dan Falvey, in regards to the NPFMC motion on agenda item C-9 that was passed at the April meeting. In particular I am commenting on the second bullet item in the motion, the statement extending EM to vessels of any size. In general I support this concept. I believe that on my vessel I could make the changes necessary to accommodate EM in a cost effective manner if I choose to fish halibut on my vessel in the future. I don't think it would ever be practical for me to fish sablefish on my vessel as I don't have the deck space for the buoy line and running line necessary to fish deep. That said, I do have some concerns about putting EM on small vessels in certain situations and I will express these concerns so that they can be discussed and addressed as the program moves forward.

I think the power requirements for running an EM system might exceed the capability of the DC and AC output on small vessels that have small engines. This is particularly true of skiff fishing. It is possible to bring a portable generator and use it to either independently run the EM system or run the EM system when the vessel is hauling gear and at low rpms. Some vessels are set up so that a portable generator can supplement the power provided by the main engine's alternator. My vessel has enough space for such a generator but it would take some work to integrate it into my electrical system. My charger automatically shuts out external power sources to the DC system when the engine is running to protect the charger, alternator and battery banks. I believe this is a technical issue that can be overcome depending on the power requirement of the EM system. Carrying a portable generator could be a problem for a vessel that is smaller than mine. This issue needs to be discussed so that an incompatible situation is not forced upon small vessels. I'm sure people with technical experience can determine how to approach this problem.

Another problem I see, especially for skiffs, is the exposure of some of the EM system computer components to the elements. The equipment I have seen on the vessel I currently fish my IFQs on would not hold up in an exposed (i.e. outside) situation.

Finally, I don't want to render vessels with small amounts of IFQ incapable of fishing their IFQ because their quota share is too small to justify paying for the necessary modifications. I suggest a threshold of 1000lbs of quota for discussion. If the vessel has less than 1000lbs of quota then it is not in the EM pool. That number is for starting discussion. It may be that a different poundage threshold is more appropriate.

My primary concern is the viability for those that have very small vessels and/or very small IFQ holdings. I do not want to see these people forced to sell out or end

up unable to maximize the earnings of their small operations because the technology is not available for their vessels or the modifications are too expensive for what little IFQs they have. If these concerns can be addressed, then I believe there is merit to extending EM to vessels of any size. EM for vessels under 40ft (and larger small vessels as well) is a good option for collecting data on catch and discard of targeted and bycatch species. EM is also good for those of us that work to fish clean and comply with fishing regulations. EM and observer coverage should benefit all of us who choose to stay in the industry over time. However, these programs are not cheap and everyone's budget, including NMFS is tight these days. These programs should be applied where they have the most benefit and that will be among the vessels that are harvesting substantial quantities of IFQ. That is why I suggest 1000lbs as a starting point for discussion.

Thanks for your consideration. Thanks for all you have done to bring about the EM option.

James Carter Hughes
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Sitka

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