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1. The supplemental analysis should evaluate coverage levels in light of national performance standards, past analyses and other recommendations with an emphasis on providing statistically reliable bycatch estimates:
  - The EA identified the 30% coverage level as a “minimum standard” and “least conservative rate” based on prior analyses showing that low levels of observer coverage were associated with high levels of error for many species and in order to achieve national performance standards for bycatch estimates, coverage levels of 30 – 78% were needed.
  - The SSC and IPHC have consistently expressed concern about low coverage levels as a significant problem in terms of bycatch estimation, urging the Council to raise the coverage level from 30% and identifying “high levels of uncertainty” about salmon and crab bycatch estimates.
2. The analysis could consider randomized sector-specific deployments to address funding constraints, and alternative sampling strategies:
  - The analysis could distinguish between gear types in the large vessel trip selection pool, particularly the difference between bycatch levels in the pot and trawl fisheries.
  - Sector-specific objectives could include periods of targeted coverage to address suspected bias associated with the increase in tender deliveries.
  - Evaluate the approach from the 2006 EA which contemplated implementing P2 deployments for previously observed vessels using prior data with unknown bias while maintaining P1 deployments for previously unobserved vessels in order to reflect priorities and cost-efficiency issues.
3. The analysis should identify coverage levels needed to monitor PSC limits:
  - The SSC’s review of Amendment 93 included significant concerns about whether observer data is adequate to ensure that fisheries do not exceed PSC limits due to the large portion of the fleets that are unobserved.
  - NMFS has noted that a PSC limit is “a high precision management tool” that is difficult to implement in fisheries with insufficient monitoring infrastructure needed to support precise PSC estimates.
4. The supplemental analysis needs to evaluate coverage levels and other program elements relevant to accounting for the observer effect:
  - The analysis should review and respond to scientific literature that compares landings and trip data from observed and unobserved trips and shows that bycatch rates estimated from observed trips do not reflect actual bycatch rates and bias the estimates.
5. The supplemental analysis provides an opportunity to proactively address projected shortfalls resulting from the revenue-based fee mechanism:
  - Consider different fee rates in different fisheries, including varying fee rate in proportion to total catches or in proportion to the volume and composition of incidental and prohibited species catch.
  - Consider TAC set aside for funding observer coverage in non-IFQ fisheries.