



North Pacific Fishery Management Council

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Feedback on the '[FMAC Subgroup Fee Analysis Update](#)' document, Sep. 2018

In attendance from the Subgroup: Bill Tweit (chair), Elizabeth Figus (Council Staff), Sam Cunningham (Council staff), Dan Falvey (ALFA), Abby Turner-Franke (NPFPA), Nicole Kimball (PSPA), Julie Bonney (AGDB)

In attendance from agency: Jennifer Ferdinand (FMA), Lisa Thompson (FMA), Craig Faunce (FMA), Phil Ganz (FMA-PSMFC), Alicia Miller (AKR), Tom Meyer (NOAA GC)

No attendance from the public

PAGE 1 If there is no analytical purpose for separating conservation and stakeholder interest, it was requested that be combined into a master list, to reflect that stakeholders also care about conservation interests.

PAGE 2 There was a request for clarification about the difference between S1 and S2 based on the hurdle approach evaluated in the EA for S1 (big T and little t) versus S2 (gear specific) hurdle approach and optimization for both scenarios.

A gear-based review of potential baseline coverage rates was conducted for the 2019 draft ADP. The FMAC wants to revisit whether S1 and S2 scenarios are defined as envisioned by the FMAC and approved by the Council after reviewing the 2019 draft ADP. The FMAC Subgroup discussed whether S1 should be based on the 2018 ADP and S2 be based on the 2019 draft ADP. A determination from FMAC on this issue will depend on how the 2019 draft ADP approach addresses ongoing FMAC desire to have different deployment levels by gear type and spatially-weighted deployment that results in a lower probability of coverage for areas with low effort.

Does the FMAC support the current approach by agency and Council staff?

- ...to figure out how much money fee increases (across the 3 analysis Alternatives chosen by the Council in February 2018) might afford; then compare what those funds (fee revenues) can buy across the 3 Alternatives (this is where objectives and reference scenarios come in). The approach would use information and deployment approaches in the 2018 ADP and 2019 ADP to assess what the Observer Program would be able to get (in coverage) with different revenues across the 3 Alternatives. The impact of the fee would be evaluated for each alternative in relation to the extent to which it satisfactorily meets the policy objectives.

NMFS staff and Subgroup members noted that not all the S1-S6 are quantitative coverage rates (as originally intended) and need to be clarified in their meaning. S4-S6 may not need to be carried forward as separate from policy objectives.

Subgroup members requested an update about how stock assessment needs and biological sampling needs will be qualitatively addressed. What sort of management needs do biological samples relate to? How do stock assessment needs compare/combine with in-season management needs? Are there coverage levels below which biological sampling becomes a concern (i.e., would not meet current stock assessment needs (This applies to the gear specific hurdle approach as well as increases in EM fleet size)?

PAGE 3 Is the fee analysis attempting to meet all sampling needs and policy objectives through S1-S6? Staff recommended potentially combining S1-S6 with the objectives, to limit redundancy. The subgroup suggested that reference scenarios S1 and S2 not be dropped, as they create a base-line goal for coverage. Coverage above S1 or S2 (gear-specific hurdle minimums) is intended to improve achievement of Council policy objectives. Subgroup members did not find the section "Matching Reference Scenarios with Needs and Objectives" useful. They feel the fee analysis must be structured to inform incremental monitoring benefits and resulting costs of higher coverage rates in achieving Council policy objectives and not a "more coverage is better" approach.

PAGE 4 The first bullet on top of page does not capture what the Subgroup felt is meant by that policy objective. The updated cost of an observer day will be known in 2019 (contract expected to be awarded June 2019). The simplified EM cost modeling approach is acceptable if start-up costs are differentiated from operational costs. The Subgroup reminded staff a key goal of the fee analysis is to provide justification for the fee percent ultimately chosen by the Council, including describing how the different levels under consideration might/might not satisfy policy objectives.

Errata = under "Working list of analytical assumptions" section, #2 should read "**EM** program expansion..."