

Testimony of Kim Dietrich, March 29, 2001, Seattle, WA

The Draft Programmatic Supplemental Environmental Impact Statement (PSEIS) is an impressive document and I applaud all of the people who assisted in its creation. I haven't had the opportunity to read the entire document but the sections I have read make me feel like the time I've spent over the past 10 years working as a fisheries observer in the North Pacific has been worthwhile. Observer data play an important role in both the scientific and management realms. For example,

- Observers collect age structures, length-frequencies and estimate total removal which is essential for stock assessment of target species
- Observers collect stomach samples which are used to evaluate predator-prey interactions
- Observers collect specimen of new fish and record sightings of marine mammals and seabirds that contribute to overall natural history and distribution information.

A disturbing aspect of the PSEIS is the fact that there is very little discussion of the **SERIOUS FLAWS** in the current Groundfish Observer Program and the vast uncertainty inherent in observer collected data (especially in the early years of the program). In fact, there was no discussion whatsoever of the adequacy of current coverage rates or whether coverage levels need to be modified in a statistically reliable way under any of the alternatives. The Agency currently has no control over what data is collected or where. **Effective coverage levels, data needs and sampling methods must be addressed for each alternative in the final PSEIS.**

For management purposes, observer data is being used in 2 different ways--one to monitor TAC's for large areas and one to monitor individual vessel removals. Current sampling protocols are probably statistically adequate for the former but severely inadequate for the latter. However, more and more emphasis has been placed on the latter without changing sampling methods. The GOP has no clearly stated goals and objectives. **The lack of goals and objectives for this program impedes progress toward a scientific and statistically reliable program which collects QUALITY fishery-dependent data.**

Thank you for hosting a hearing in Seattle and providing Washington residents with the opportunity to participate.