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High Seas Catcher's Coop
BS Salmon Bycatch

Support AP motion.

Focus of testimony will be on five issues.

- 1) S.Q. The description of SQ should be expanded to include bycatch reductions already accomplished since high level in 2007 when Chinook bycatch was 120,000. That number has been reduced by about 90%. The salmon bycatch agreements and IPAs implemented since that time have included many measures to reduce these numbers which should be described in this document. The SQ description should be linked to AEQ return estimates which most recent analysis places at between 1.5 and 1.9 percent of AYK river returns. This additional information will allow the public to better understand actions already taken and reductions already made as well as expectations of what additional actions might contribute to AYK river returns.
- 2) Cost benefit. The document should include, to the extent possible, AEQ impacts of alternatives 4&5 so that the public can better understand the potential benefits of these actions to increase Chinook returns to AYK rivers. It should also include, to the extent possible, economic impacts of Alt 4&5 to the pollock fishery. The current document concludes that that these alternatives may have some positive impact to Chinook returns and no negative impacts to the pollock fishery with little data to support those conclusions.
- 3) Index Alternatives. Floating PSC Caps have been discussed in this arena for decades. This is a cutting edge alternative deserving closer scrutiny than just one alternative. A more reasonable range would be 2 or 3 options. For instance; a) 3 River Index, b) 4 River Index and a different approach such as c) reduce October pollock season length when majority of Index fisheries are closed to subsistence fishing. The document should also expand its look at impacts of "masking" and "lagtime" of the various trigger mechanisms.
- 4) Analysis of Lower Performance Standard seems flawed insofar that it looks at impacts of lower standard in relation to current bycatch performance rather than current performance standard. Because it concludes there would be no negative impacts to pollock fishery by lowering the performance standard 60%, it seems to assume that the IPAs will allow pollock fishery bycatch to be at a level at or close to the new performance standard. The elements of the current IPAs will not allow that to occur. The IPAs will have to be significantly modified and could force fish to be left in the water or force an opt out of the performance standard. A fuller discussion of these impacts seems merited.
- 5) Reduction in higher, hard cap of 60,000 Chinook. The purpose of this alternative package is to look at further measures reduce bycatch in years of low abundance, especially when subsistence fisheries are closed. There seems a disconnect to include reductions in the hard cap which is designed to limit bycatch in years of high abundance. The current analysis is based on a SQ that includes a cap of 60,000. To make decisions based on that cap, knowing you may change it in a trailing action may undermine the conclusions of this analysis.