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My name is Julie Bonney. I represent the members of Alaska Groundfish Data Bank, both shorebased processors and trawl catcher vessels that support fishery economies in Alaskan coastal communities.

We are certainly sympathetic to Chinook direct users and their pain due to the recent poor Chinook salmon runs. However, the entire topic of salmon bycatch is extremely complicated, an issue that stakeholders in the federal fisheries and the NPFMC has spend a large amount of time and energy to figure out ways to reduce and mitigate the impacts of bycatch.

It is important that the committee understands that the GOA trawl industry and the BSAI trawl industry are completely different both in terms of Chinook salmon that we catch and the fishery management tools available to the fleets to reduce Chinook salmon bycatch.

First, The GOA Chinook salmon bycatch taken in the trawl fisheries are not Coastal Western Alaska stocks. For the GOA, 99% of the 2011 genetic samples were from GOA/Pacific coast regions, with the British Columbia contributing 40%, followed by the West Coast of the US at 26% and Southeast Alaska at 14%. All three of these regions have a large amount of hatchery produced Chinook salmon with an annual release in the neighborhood of 200 to 250 million fish. Presently environment conditions are extremely favorable for Chinook in both Canada and the Pacific Northwest; these areas are seeing all time highs for both returns and catches. Frankly in recent years the GOA trawl industry are seeing more and more Chinook salmon on the fishery grounds.

Second, The GOA trawl industry is still managed at the fleet level for both bycatch and groundfish catches which create a "race for fish". In a race for fish vessels compete for their share of both the available fisheries quotas and bycatch caps. By managing Chinook salmon bycatch at the fleet level, every participant suffers from the action of any individual vessel with high bycatch. The high salmon bycatch from one vessel limits the fishing opportunity of every other vessel dependent on a Chinook salmon cap. Similarly, the Chinook avoidance of any one vessel accrues to the benefit of all other vessels. The paradox of this race for fish management structure is that the participants who incur the greatest costs to avoid Chinook salmon are likely to realize the least benefit from the fishery, while those who incur the least salmon avoidance costs realize the greatest gains. Trawl dependent processors and communities who depend on their harvesting vessels are impacted by these perverse incentives of this type of fishery management system since the incentives in the fishery are all upside down.

In the BS the fisheries both the pollock quota and Chinook salmon hard cap are allocated to fishery cooperatives; in these cooperatives each harvesting vessel knows how much of both pollock and Chinook salmon they are allowed to catch. This fishery management structure holds each harvesting vessel responsible for its own fishing behavior; this sets up a system of incentives that rewards good behavior at the vessel level.

If the legislature truly wants to do something positive to reduce Chinook salmon bycatch in the GOA, that also supports a vibrant groundfish trawl industry and dependent coastal Alaskan communities we would ask that your resolution be modified to ask the NPFMC to move forward expeditious with a cooperative program similar to the BS that provides the necessary fleet tools and incentives to reduce Chinook salmon bycatch.