



# NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

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## Action Memo

**File Number:BYC 15-015**

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**Agenda Date**4/6/2015

**Agenda Number:**C4

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**Dan Hull, Chairman**  
**Chris Oliver, Executive Director**

**SUBJECT:**  
Bering Sea Salmon Bycatch - Final Action

**ESTIMATED TIME:**  
20 hours

**ACTION REQUIRED:**  
Final Action on EA/RIR/IRFA for Bering Sea Chinook and Chum salmon bycatch management measures

### BACKGROUND:

At this meeting the Council will take final action on an EA/RIR/IRFA evaluating Bering Sea Chinook and Chum salmon bycatch management measures in the Bering Sea pollock fishery. The Council took initial review of this analysis in December and requested a number of changes to the alternatives. The Council motion from December 2014 is attached.

### *Alternatives under consideration*

The analysis considers four alternative management strategies in addition to the status quo management. Each of the four additional alternatives were designed to improve upon the current management of chum and Chinook salmon PSC by providing opportunities for increased flexibility to respond to changing conditions and greater incentives to reduce bycatch of both salmon species. These alternatives are not mutually exclusive.

**Alternative 1: No Action.** Current management measures are in place for both Chinook salmon PSC and chum salmon PSC. For Chinook salmon PSC, a complex management system is in place which sets overall limits to close fishing by sector and season, while incorporating some improved flexibility by including a performance standard and promoting the creation of industry-proposed IPAs to further reduce bycatch below the performance standard. The plans, as reviewed by the Council, are designed to increase incentives for vessels to lower bycatch rates even in years when salmon encounters were low. The mothership and CP IPAs were both modified for 2015 to include requirements for salmon excluders and several additional provisions. For chum salmon PSC, the pollock fleet is exempt to a large-scale closure (chum salmon savings area) in the Bering Sea for participating in a rolling hot spot (RHS) program which uses real-time data from the fleet to move the fleet away from areas of highest bycatch by week. The entire fleet participated in this program which is governed by a contractual agreement and managed by third-party contractor Sea State which assimilates fleet data and closes areas of the fishing grounds to cooperatives which have the highest bycatch rates in that

week. The provisions of the contractual agreement for the RHS program are in regulation.

**Alternative 2: Move Chum salmon PSC into IPAs.** This alternative addresses chum salmon PSC management measures only. An annual exemption from the Chum Salmon Savings Area is contingent upon participation in an incentive plan agreement that includes the provisions for addressing chum salmon PSC within their existing program. General requirements for chum salmon PSC management in the IPAs would be included in regulation. IPAs would likely run a fleet-level RHS program similar to status quo but with improved flexibility to avoid Chinook salmon PSC in the latter portion of the summer fishing season. Provisions of the RHS would be removed from regulation but the Chum salmon savings area would remain in the FMP and in regulation and vessels which do not participate in an IPA will be subject to the closure when enacted.

**Alternative 3: Additional IPA provisions.** This alternative addresses Chinook management measures only. Under this alternative, the IPAs would need to modify their programs to include additional provisions and restrictions intended to increase incentives to reduce Chinook PSC. These modifications include the following: restrictions or penalties for vessels which have consistently high Chinook PSC rates, require use of salmon excluders, require that a RHS program for Chinook operate throughout both A and B seasons, modify the longevity of a savings credit under savings-credit-based IPA programs (for inshore and mothership IPAs only), and additional restrictions or performance criteria to ensure that bycatch rates in October are not higher than the preceding months. Here the latitude to address these provisions would be left to the individual IPAs but general requirements would be added to the regulations to include additional provisions. The options under this alternative are not mutually exclusive.

**Alternative 4: Revise the Bering Sea pollock fishery season dates and seasonal allocation of pollock.**

This alternative addresses both Chinook and Chum salmon PSC measures and modifies the existing B-season start and end dates for the pollock fishery as well as the seasonal allocation of pollock. Here two season date options are considered: to begin the season on June 1<sup>st</sup> instead of June 10<sup>th</sup> and to end the season on September 15<sup>th</sup>, October 1<sup>st</sup> or October 15<sup>th</sup>. The third option provides for a shift in the seasonal allocation of pollock to increase A-season allocation by 5-10% of the annual pollock quota. These options are not mutually exclusive. This alternative is intended to shift the fishing effort earlier in the B season when Chinook bycatch rates have historically been lower.

**Alternative 5: Lower the PSC limit and/or the performance standard threshold indexed to years of low Chinook abundance.** Under this alternative the overall PSC limit (60,000) and/or the performance standard limit (47,591 annually; divided by sector and season) would be lowered in years where western Alaska Chinook salmon stocks are low. ADF&G would make the determination of 'low Chinook abundance' each fall based on an assessment of the indexed run strength of the combined run sizes of the Unalakleet, Upper Yukon and Kuskokwim river systems. NMFS would set the annual PSC limit and/or performance standard's annual threshold amount based on ADF&G's determination in the annual harvest specifications. As with status quo, sectors that exceed the applicable performance standard threshold, in 3 out of 7 years, would be held to their proportion of the 47,591 Chinook PSC limit every year thereafter. All other provisions of the current Chinook salmon PSC management program under status quo would remain in place. Options for reducing the PSC limit and/or performance standard threshold range from 25-60% reduction from current limits. For the PSC limit this is a range of 24,000-45,000 while for the performance standard threshold this is a range of 19,036 - 35,693. The performance standard threshold is the level to which IPAs are structured in the

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incentives to remain below. Reduced caps would only be applicable in years of low western Alaska Chinook salmon abundance as described above.

*Errata and supplemental information for the EA/RIR/IRFA*

Attached is a summary of some clarifications and revisions by section and page number to the Public Review draft of the EA/RIR/IRFA. An executive summary of the analysis, revised to incorporate the changes as noted in also attached. A supplemental document is also attached which suggests that there are likely to be increased economic benefits of moving quota to the A season, potentially as high as \$30 million in 2014, although it is expected that the actual benefits may be lower and are uncertain. This information is being provided now after various efforts were made to determine the economic benefits of changing the season length or moving pollock quota from B to A season and several data inconsistencies were resolved.

*Outreach efforts to Western Alaska*

In order to solicit review and comment of the alternatives from communities in western Alaska that may not otherwise be able to participate easily in the Council process, the Council initiated an outreach plan for this analysis that included a series of meetings with community or regional representatives in a broad range of western Alaskan communities between January and February, 2015. Consistent with previous efforts to most efficiently reach as many of the western Alaskan regions as possible, Council staff coordinated with to the Federal Subsistence Regional Advisory Councils (RACs) to include the Council presentation in their regularly scheduled annual meetings. Council staff also worked with Kawerak Corporation (Nome, AK) to arrange a meeting in Nome. At least two NPFMC Council members accompanied one or two Council staff to each meeting. An overview of the meetings, the statewide teleconference and resolutions resulting from these outreach efforts have been summarized in the attached report. Council staff will provide an overview of the report in conjunction with staff reports on this analysis.

*Action before the Council*

At this meeting the Council will select a Preferred Alternative (PA) for final action. As this PA may combine across alternatives under consideration additional information is included in the document and will be summarized by staff on the likely implications of mixing and matching across alternatives to create a PA.