

MEMORANDUM

TO: Council, SSC, and AP Members

FROM: Chris Oliver *Chris*  
Executive Director

DATE: March 23, 2011

SUBJECT: GOA Chinook salmon bycatch *Diana Evans*

ESTIMATED TIME 8 HOURS (all C-3 items)
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ACTION REQUIRED:

- (b) Initial review of GOA Chinook salmon prohibited species control measures in the pollock fishery

BACKGROUND:

In December 2010, the Council initiated two amendments to address GOA Chinook salmon bycatch. The first amendment package addresses Chinook salmon bycatch in the GOA pollock fisheries through a hard cap or a mandatory cooperative requirement. The Council requested that this action be completed on an expedited timeframe, and indicated that this action was an extremely high priority. A longer-term amendment package will address comprehensive salmon bycatch management in all the GOA trawl fisheries, and will evaluate a broader suite of management measures to reduce bycatch. The Council motion is attached as Item C-(b)(1).

The initial review draft of the analysis for the pollock fishery management measures was mailed to the Council in early March, and the executive summary is attached as Item C-3(b)(2). The analysis evaluates amending the GOA Groundfish FMP either to create a PSC limit for western and central GOA pollock fisheries that would close the fishery once reached (Alternative 2), and/or require all vessels participating in the western/central GOA pollock fisheries to be a member of a salmon bycatch conservation cooperative (Alternative 3). The cooperative would include contractual requirements to retain all salmon until counted by an observer, and other salmon bycatch reduction measures.

NMFS has raised concerns with the administration of the mandatory cooperative alternative. Specifically, the administration of cooperatives (including approval of annual cooperative contracts and any penalties for violation of the cooperative agreement) must be implemented in a manner that maintains NMFS' management authority over the fishery. Whether cooperatives would be able to serve their intended purpose, while maintaining a level of oversight that maintains that authority, is uncertain.<sup>1</sup> An additional concern arises from a mandatory reporting of catch data within cooperatives. Any such reporting requirement would need to comport with data confidentiality constraints.

As of March 19, 2011, the estimate of Chinook salmon prohibited species catch in the GOA pollock fisheries is 1,641 in the Central GOA and 360 in the Western GOA. These numbers are still fluctuating,

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<sup>1</sup> In a voluntary cooperative structure (where a vessel has a reasonable fishing opportunity outside of a cooperative) management authority would be maintained, as membership is not a prerequisite to participating in the fishery.

however, as more observer information is entered into the system. In previous years (2003-2010), approximate catch levels at this time of year in the Central GOA pollock fishery varied between 800 and 26,000 fish, and in the western GOA between 217 and 2,100 fish (although in some years, the numbers cannot be reported because of confidentiality). The total Chinook salmon prohibited species catch in the GOA for all target fisheries is estimated at 2,439 fish through March 19.

At the February meeting, the Council asked that, to the extent possible, staff conduct outreach meetings in communities potentially affected by the proposed action between the March/April and June meetings. The Outreach Committee will provide further direction on this effort when they next meet. In the meantime, however, two of the Subsistence Regional Advisory Councils (for Southcentral and Southeast) requested staff to provide a brief presentation on the Council's proposed action during their spring meetings. **Item C-3(b)(3)** provides a short summary of questions and clarifications from those meetings.

Finally, **Item C-3(b)(4)** reprints Appendix 3 from the analysis, as the first table in that appendix was incorrect in the initial review draft.