

MEMORANDUM

TO: Council and AP Members
FROM: Chris Oliver *Chris*
Executive Director
DATE: September 26, 2013
SUBJECT: Bering Sea Salmon bycatch

ESTIMATED TIME
8 HOURS

ACTION REQUIRED

- (a) SeaShare report on the salmon donation program
- (b) Review Chinook Salmon Report
- (c) Industry IPA reports for Bering Sea chum salmon

BACKGROUND

- (a) SeaShare report on the salmon donation program

In conjunction with discussions of salmon bycatch measures, the Council requested information on the SeaShare prohibited species bycatch donation program. A document prepared by SeaShare providing information on program function, what portion of salmon and halibut are distributed within Alaska and other information as relevant to discussion of program participation is attached as Item C-6(a)(1). Jim Harmon will be available to provide a presentation of the report and program overview at the meeting.

- (b) Review Chinook Salmon Report

In April 2013, the Council requested that staff compile a report including the following general elements (the full Council motion from April is attached as Item C-6(b)(1)):

1. A review of the status of Alaska Chinook salmon stocks, including subsistence, sport, and commercial fishery restrictions and whether escapement goals have been met.
2. An updated adult-equivalency (AEQ) analysis incorporating the most recent genetic data on stock of origin (2011) and where possible PSC harvest rate analyses for Chinook salmon stocks. It was further requested that the AEQ analysis include an estimate of the impacts of bycatch at the current cap levels (47,591 and 60,000) and at actual bycatch levels in 2011 and 2012.
3. Measures of fishing performance including sector and vessel specific bycatch rates by season and estimated use of excluder devices on trawl nets for salmon avoidance.
4. Description and/or presentation of the incentive mechanisms contained within the IPAs.

A staff discussion paper which addresses the first three items of the Council's request was made available on September 17th and is attached as Item C-6(b)(2). Representatives from the sector specific incentive program agreements (IPAs) will provide information to the Council during the meeting to address the 4th request. These reports on bycatch management performance measures are being considered at this time in the context of the ongoing interest and actions in front of the Council to minimize salmon bycatch and to allow an opportunity to evaluate this issue with updated information on directed salmon fisheries and with the most recent genetic information, AEQ analysis and examination of individual vessel performance. Information included in the staff report provides both an update of what was previously available to the Council at final action in 2009 for Amendment 91 (Bering Sea Chinook PSC Management Measures action) as well as information and analyses that were not available in the 2009 analysis. The latter includes calculated AEQ impact rates by stock grouping at current levels and cap levels, vessel-specific bycatch comparison, and voluntary excluder usage.

(c) Industry IPA reports for Bering Sea chum salmon

In December 2012, the Council reviewed an updated analysis of the Chum salmon PSC management measures EA/RIR/IRFA. This amendment package evaluated alternative chum salmon PSC measures in the Bering Sea pollock fishery. Chum salmon PSC is managed differently from Chinook management under a system that has been implemented since 2006 following approval of Amendment 84 to the BSAI Groundfish FMP. Under this system, pollock vessels are exempt from the large-scale regulatory Chum salmon savings area (CSSA) closure for participation in a rolling hot spot (RHS) system designed to move vessels away from areas of higher chum salmon bycatch rates. Absent the RHS exemption conveyed under Amendment 84, the fleet would be subject to the CSSA closure. The CSSA closure was designed to close to all trawling from August 1 through August 31, and if 42,000 non-Chinook salmon are caught in the Catcher Vessel Operational Area (CVOA) during the period August 15 through October 14, the area remains closed for the remainder of the period September 1 through October 14. As catcher/processors are prohibited from fishing in the CVOA during the B season, unless they are participating in a CDQ fishery, only catcher vessels and CDQ fisheries are affected by the PSC limit. This PSC limit is partitioned between the non-CDQ and CDQ fleets. Since 2006 the entire fleet has participated in the RHS and therefore the closure is effectively no longer applicable. The regulations implementing Amendment 84 contain detailed requirements for the contents of the RHS inter-cooperative agreement (ICA), including information about the participants (those parties signing the ICA and agreeing to abide by its provisions), specific bycatch reduction measures, and monitoring and enforcement provisions. In contrast, requirements for the incentive plan agreements (IPAs) implemented under Amendment 91 for Chinook contain only general requirements for NMFS approval of a proposed IPA.

In evaluating revisions to the current management for chum PSC, the Council considered a suite of alternative management measures. The measures under consideration included PSC limits which would close the fishery upon reaching the limit either until the end of July or for the remainder of the B-season, and bycatch management under a revised rolling hot spot (RHS) system (with or without additional triggered area closures). This was the third time that the Council had reviewed the analysis in order to best tailor alternatives to meet the Council's purpose and need statement. The purpose and need statement is shown below:

Magnuson-Stevens Act National Standards direct management Councils to balance achieving optimum yield with bycatch reduction as well as to minimize adverse impacts on fishery dependent communities. Non-Chinook salmon (primarily made up of chum salmon) prohibited species bycatch (PSC) in the Bering Sea pollock trawl fishery is of concern because chum salmon are an important stock for subsistence and commercial fisheries in Alaska. There is currently no limitation on the amount of non-Chinook PSC that can be taken in directed pollock trawl fisheries in the Bering Sea. The potential for high levels of chum salmon bycatch as well as long-term

impacts of more moderate bycatch levels on conservation and abundance, may have adverse impacts on fishery dependent communities.

Non-Chinook salmon PSC is managed under chum salmon savings areas and the voluntary Rolling Hotspot System (RHS). Hard caps, area closures, and possibly an enhanced RHS may be needed to ensure that non-Chinook PSC is limited and remains at a level that will minimize adverse impacts on fishery dependent communities. The Council should structure non-Chinook PSC management measures to provide incentive for the pollock trawl fleet to improve performance in avoiding non-Chinook salmon while achieving optimum yield from the directed fishery and objectives of the Amendment 91 Chinook salmon PSC management program. Non-Chinook salmon PSC reduction measures should focus, to the extent possible, on reducing impacts to Alaska chum salmon as a top priority.

In developing this problem statement, the Council indicated the need to balance competing objectives including: 1) providing incentive to reduce chum salmon PSC to the extent practicable with priority within chum salmon measures placed on measures which reduce impacts to Alaska chum, 2) allowing for the pollock fishery to operate to achieve optimum yield, and 3) achieving the objectives of the current Chinook salmon PSC management program. Balancing these competing objectives has complicated developing appropriate management measures for chum salmon PSC. Analysis of the various alternatives indicated that most measures which balance OY from the pollock fishery with reduced chum salmon PSC do so at the risk of undermining reducing Chinook salmon PSC.

After consideration of the complicated suite of alternatives and the analysis of impacts, the Council elected to move the analysis to a different direction. The Council requested that the pollock industry give consideration to how they might incorporate an explicit chum salmon PSC avoidance program within their existing sector-specific Chinook salmon incentive program agreements (IPAs) with vessel-level accountability. In doing so the Council recognized that this would delay selection of a preferred chum salmon management approach but indicated that the IPAs may provide the most adaptive, flexible forum for managing competing objectives in bycatch avoidance between Chinook salmon and chum salmon. The Council's motion from December 2012 is attached as Item C-6(c)(1).

Since that time the IPAs have discussed approaches for managing chum salmon bycatch within their existing programs. A written proposal from the IPA representatives will be available at the meeting. Industry representatives will provide a verbal report to go along with this proposal and answer additional questions at that time.