



# C2 Bering Sea Chum Salmon Bycatch

February 2025

## Action Memo for the SSC

Council Staff:	Dr. Kate Haapala, Ms. Sarah Murrinan, Dr. Diana Stram
Other Presenters:	Dr. Pat Barry (AFSC, Auke Bay Labs)
NMFS Staff:	Doug Shaftel, Gretchen Harrington, Doug Duncan, Abby Jahn, Jennifer Mondragon, and Mason Smith
Other Contributors:	Zach Liller (ADF&G), Terese Vincente (KRITFC), Krystal Lapp (TCC)
Action Required:	Initial Review Draft Analysis – Review and provide feedback on analysis to determine whether it is sufficient for final action

## BACKGROUND

The Council is considering new measures for chum salmon bycatch management in the Bering Sea pollock fishery. The proposed regulatory changes aim to reduce chum salmon bycatch in the pollock fishery with a particular focus on reducing Western Alaska chum salmon bycatch. The current range of alternatives includes limits or “caps” on the number of chum salmon that may be caught in the pollock fishery and closure of all or part of the Bering Sea to the fishery once the limit is reached. Chapter 2 of the preliminary Draft Environmental Impact Statement (DEIS) includes a detailed description of the proposed alternatives.

The SSC received a presentation and reviewed the preliminary DEIS and Social Impact Assessment prepared for this action in April 2024. The prior analyses have been synthesized and combined for this iteration. While the format of the analysis has changed, the methodologies and analytical approach are the same as those used in April 2024 unless the [SSC recommended](#) specific changes to better inform the Council’s recommendation and decision-making.

At this meeting, the SSC will receive a presentation on changes made to the preliminary DEIS in response to the SSC’s recommendations and new analysis prepared for this iteration on the potential environmental, economic, and social impacts of the proposed alternative management measures. The National Marine Fisheries Service (NMFS) is the lead federal agency, and three cooperating agencies have provided special expertise to the analysis: the Alaska Department of Fish and Game (ADF&G), the Kuskokwim River Inter-Tribal Fish Commission (KRITFC), and the Tanana Chiefs Conference (TCC).

## SSC ACTIONS

**The SSC’s primary role under the C2 agenda item is to review the revised analysis for scientific merit – whether it is sufficient to inform the Council’s decision-making – and provide advice to the Council.** The SSC may consider whether the analysis provided is adequate to allow the Council to distinguish among the alternatives, meets the analytical requirements of applicable laws and executive orders, and provides the Council with a sufficient understanding of the probable impacts of a decision related to this action. Based on this review, the SSC may determine the analysis should undergo additional review, or that the analysis is sufficient to inform the Council for final action (possibly after additional adjustment.)

The SSC may provide input and feedback on the entirety of the analysis. However, because the SSC has reviewed a prior version of this analysis, and in light of the SSC's limited agenda time, the presentation from analytical staff will be focused on a select range of topics identified directly below.

1. **An overview of how the analysts considered and addressed the SSC's comments from April 2024.**
  - The SSC should consider whether the revised analysis presented at this February 2025 meeting sufficiently responds to its prior comments and recommendations on earlier versions of the analysis.
2. **The methods used to prepare a simplified adult equivalency (AEQ) analysis for chum salmon caught as bycatch in the Bering Sea pollock fishery.**
  - The SSC should review the AEQ methodologies, determine whether specific changes need to be made to the approach used, and/or whether the methodologies used are sufficient.
  - Relevant information can be found in Section 3.2.4.1.4 in the preliminary DEIS and the corresponding subsections that address the data limitations and uncertainties associated with completing an AEQ analysis, and Appendix 5 contains additional and more specific detail on these methodologies.
3. **A presentation on the methods used to analyze Alternative 5.** This is a new management alternative added at the Council's April 2024 meeting. Alternative 5 includes three different options for time/area closures in the Bering Sea that are triggered by a PSC limit. Only one time/area closure could be selected and recommended or (eventual) implementation.
  - The SSC should review the methodologies used to analyze the potential impacts of moving the pollock fleet out of these three areas if or when the PSC limit was met.
  - Section 3.2.4.4 and the corresponding subsections contain relevant information on the different analytical and model approaches considered and used.
4. **The presentation will describe new information from ADF&G that indicates funding to continue operating the Bethel Test Fishery is uncertain.** The Bethel Test Fishery is currently the data source for the Kuskokwim Area in the Three-area index being considered under Alternative 3, Option 1. If the Council intends to move Alternative 3, Option 1 forward, it would need to consider other data sources for indexing chum salmon abundance to the Kuskokwim River.
  - The SSC may provide advice on the tradeoffs of an alternative data source for the Kuskokwim Area, but it is not required to. Selecting an alternative data source is a policy decision for the Council. If the SSC does not provide input on an alternative data source for the Kuskokwim portion of the Three-area index, the SSC's prior advice for developing indices (from October 2023 and April 2024) would continue to be used and applied moving forward. This advice largely includes: that the Council use the full time series of data available, and continue to treat each area as an independent test.
  - Relevant information for Alternative 3 can be found in Section 2.4 in the preliminary DEIS, and information on alternative data sources for the Kuskokwim Area can be found in Appendix 2 beginning on page 9 as well as Appendix 7 beginning on pg. 33.