



# **C2 Bering Sea Chum Salmon Bycatch**

February 2025

## **Action Memo**

Council Staff:	Dr. Kate Haapala, Ms. Sarah Marrinan, Dr. Diana Stram
Other Presenters:	Dr. Pat Barry (AFSC, Auke Bay Labs)
NMFS Staff:	Doug Shaftel, Gretchen Harrington, Doug Duncan, Jennifer Mondragon, Josh Keaton, Krista Milani, Abby Jahn, Mason Smith, Lis Henderson, and Molly Zaleski
Other Contributors:	Zach Liller (ADF&G), Caroline Brown (ADF&G), Terese Vincente (KRITFC), and Krystal Lapp (TCC)
Action Required:	<ol style="list-style-type: none"><li>1. Initial Review Draft Analysis – Review; the Council may modify its alternatives and either request additional review or recommend the analysis be released for publication by NMFS as a Draft Environmental Impact Statement</li><li>2. NMFS Tribal Engagement Report - Review</li><li>3. Cooperating Agency Presentations - Review</li><li>4. 2024 Bering Sea chum salmon bycatch genetics report - Review</li></ol>

## **BACKGROUND**

The Council is considering new management measures for chum salmon bycatch in the Bering Sea pollock fishery. The proposed changes to existing federal regulations aim to reduce chum salmon bycatch in the pollock fishery, particularly Western Alaska chum salmon bycatch. The range of management alternatives being considered 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 pollock fishing once a cap is met, as well as changes to the IPAs. At this meeting, analytical staff will provide a presentation on the preliminary Draft Environmental Impact Statement (DEIS) analyzing the potential environmental, economic, and social impacts of the proposed alternatives.

The National Marine Fisheries Service (NMFS) is the lead federal agency responsible for this preliminary DEIS, and it is the federal agency responsible for undertaking Tribal Consultations under Executive Order 13175. NMFS Alaska Regional Office staff will provide a presentation on recent Tribal Consultations and engagement sessions on the Bering Sea chum salmon bycatch action.

Three cooperating agencies have provided special expertise to the DEIS: the Alaska Department of Fish and Game (ADF&G), the Kuskokwim River Inter-Tribal Fish Commission (KRITFC), and the Tanana Chiefs Conference (TCC). Each cooperating agency’s special expertise is summarized in brief in Section 1.3.4 of the analysis. When relevant, sections of the preliminary DEIS identify contributions from cooperating agencies. NMFS provided an opportunity for cooperating agencies to provide additional and unedited information to inform decision-making which is available in Appendices 7 and 8. KRITFC and TCC will provide presentations under the C2 agenda item related to their contributions.

The Council will also receive a summary report on the genetic stock of origin for the chum salmon caught as bycatch in the 2024 Bering Sea pollock fishery. The Council typically receives all salmon bycatch genetics reports at its annual April meeting. To accommodate the February 2025 meeting, Auke Bay Labs geneticists prioritized completing the 2024 Bering Sea chum salmon bycatch analyses. The current plan is

for the written reports on the genetic analyses for Chinook salmon bycatch in the GOA pollock fishery, GOA rockfish and arrowtooth trawl CV fishery, and the GOA non-pollock CP trawl fisheries to be published in April 2025 and the Bering Sea Chinook salmon bycatch genetic analyses to be published in June 2025. If oral presentations on these additional reports are of interest to the Council, staff would plan to coordinate these presentations to occur in conjunction with the next review of this chum salmon bycatch action.

## COUNCIL ACTIONS

The Council has three primary decision points at this February meeting. The decision points listed directly below are somewhat interrelated and **will directly affect the possible timeline for any future action.**

1. whether, and if so how, to modify the current range of action alternatives; and
2. whether to request additional analytical review through another Council meeting; or
3. whether to recommend the analysis be released for publication by NMFS as the draft EIS. The Council may release the analysis for publication whether the alternatives are modified or not.

***Modifying Current Alternatives.*** The current range of alternatives was adopted by the Council in April 2024, all of which are described in Chapter 2 of the preliminary DEIS. The Council is not required to make any changes to the current range of action alternatives; however, the Council may choose to make small changes to the current alternatives, or more substantial changes including adding a new alternative. Adding a new or modified alternative may require additional time for this work to be completed.

***Additional Council Review Prior to Final Action.*** If additional analysis is requested on a new or modified alternative, the Council would also need to determine whether this would warrant additional time during a Council meeting for another initial review prior to final action. Additional Council review and associated opportunities for public comment may be preferred based on the extent of new analysis. However, it would also delay publication of the draft EIS.

***Publication of the Draft EIS.*** Whether or not current alternatives are modified, the Council could request at this meeting that this iteration of the analysis be revised and released for publication by NMFS as the draft EIS, without first coming back to the Council for review. The Council may also choose to identify a Preliminary Preferred Alternative (PPA), for the purpose of focusing public comment on the draft EIS. Identification of a PPA at this stage is not a requirement, and it would not bind the Council's final recommendation.

Once the document is published as the draft EIS there must be a minimum 45-day public comment period, but it is expected the agency would aim to provide a 60-day public comment period which would be in line with prior Council actions. After this comment period, the Council will schedule final action on the draft EIS, taking into account the public comments received. No additional analysis would be conducted for final action. The agency will prepare a formal response to public comments on the draft EIS to publish with the Final EIS that incorporates the Council's final recommendation for a preferred alternative.

Two timeline scenarios are posed below to facilitate Council dialogue and public input.

**Scenario 1:** The Council recommends the document prepared for this meeting be revised in response to requests for changes received at this meeting, and that NMFS then publish the draft EIS. A timeline with tentative milestones for this scenario is provided below. All timelines portrayed in this memo are tentative and may change in response to Council priorities, meeting planning, and other contingencies. The key points for consideration are the milestones themselves and the windows of time between them.

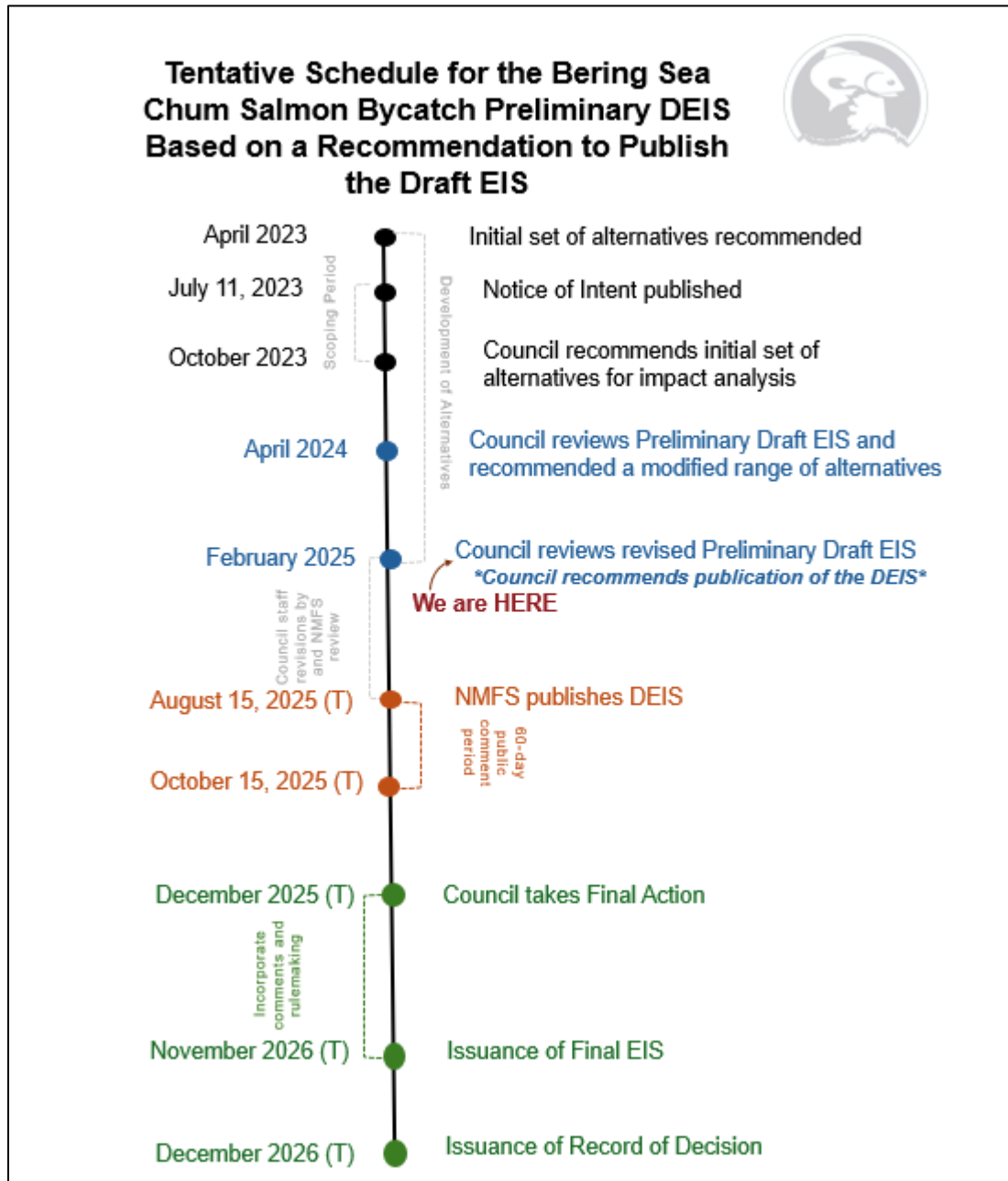


Figure 1. Tentative timeline for the Bering Sea chum salmon bycatch action if the Council recommends the DEIS be published at the February 2025 meeting.

**Scenario 2:** The Council requests additional review of a revised impact analysis. The Council would need to schedule the chum salmon bycatch action review for an additional meeting later in 2025, while balancing other scheduling priorities. Final action would subsequently be scheduled for 2026. The Council’s upcoming meeting schedule is as follows:

2025 schedule

- ~~February 3-10, 2025:~~ Egan Center, Anchorage, AK
- ~~March 31-April 7, 2025:~~ Egan Center, Anchorage, AK
- **June 2-10, 2025:** Agate Beach BW, Newport, Oregon
- **Sept 29-Oct 8, 2025:** Egan Center, Anchorage, AK
- **December 1-9, 2025:** Egan Center, Anchorage, AK

2026 schedule

- **April 6-14, 2026:** TBD, Anchorage, AK
- **June 1-9, 2026:** Hilton Hotel, Vancouver, WA
- **October 5-14, 2026:** Homer, AK
- **December 7-15, 2026:** TBD, Anchorage, AK

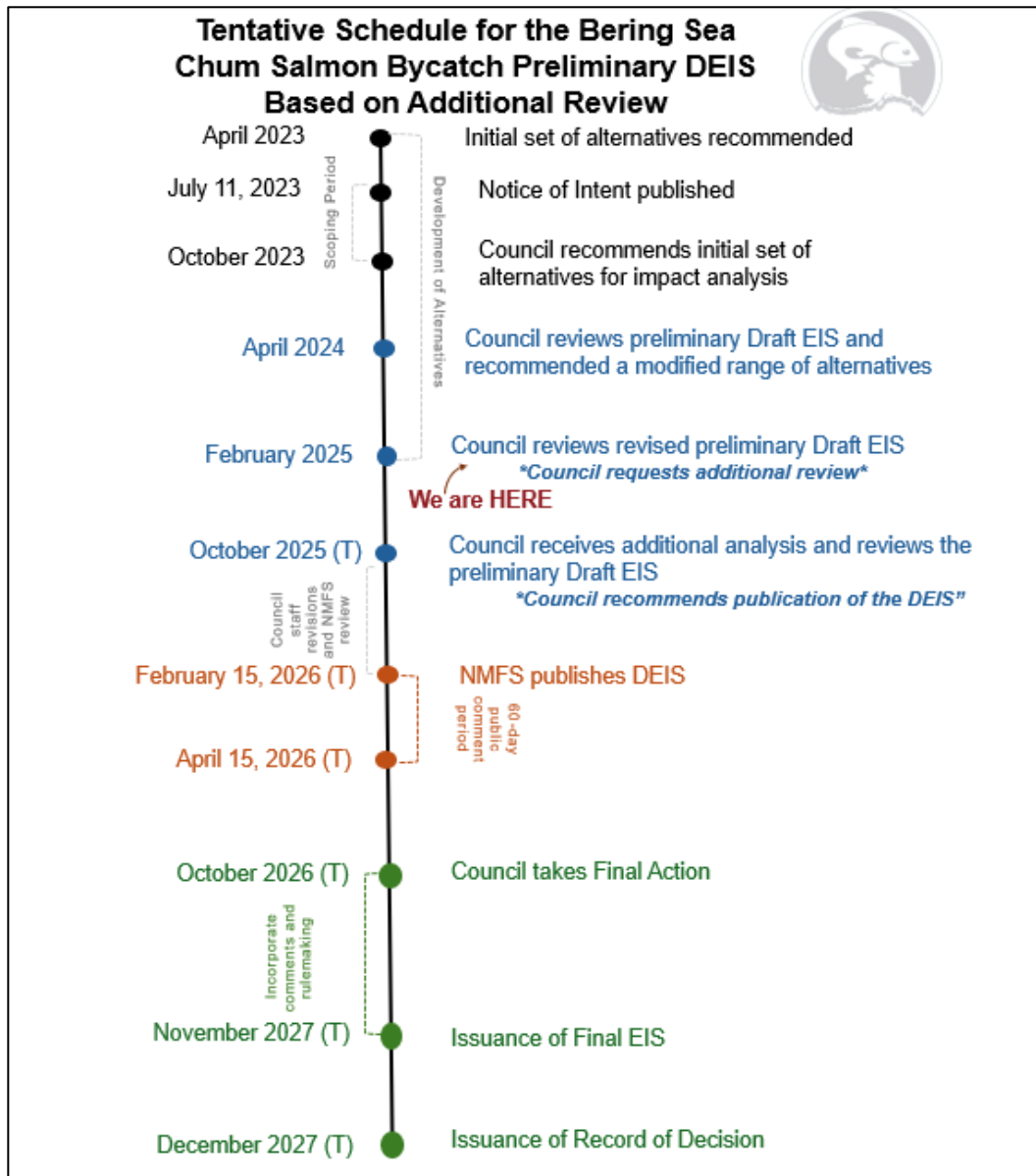


Figure 2. Tentative timeline for the Bering Sea chum salmon bycatch action if the Council requests additional review.