**Synthesized staff draft P&N statement based on proposals**

**This is a staff starting point for discussion by the committee for further consideration and revisions during the meeting.**

Staff notes in blue; Link to guidance on National Standard: <https://www.fisheries.noaa.gov/national/laws-and-policies/national-standard-guidelines>

**Need for the action:**

Salmon are an important fishery resource throughout Alaska, and chum salmon that rear in the Bering Sea support subsistence, commercial, sport, and recreational fisheries throughout Western and Interior Alaska. Western and Interior Alaska salmon stocks are undergoing extreme crises and collapses, with long-running stock problems and consecutive years’ failures to achieve escapement goals, U.S.-Canada fish passage treaty requirements, and subsistence harvest needs in the Yukon, Kuskokwim, and Norton Sound regions. These multi-salmon species declines have created adverse impacts to culture and food security and have resulted in reduced access to traditional foods and commercial salmon fisheries. ~~Chum salmon migrate through both state and federal waters and both agencies have obligations to meet in-river escapement and subsistence needs.~~

The best available western science suggests that ecosystem and climate changes arethe leading causes of recent chum salmon run failures; however, non-Chinook (primarily chum) salmon are taken in the Eastern Bering Sea pollock trawl fishery which reduces the amount of salmon that return to Western and Interior Alaska rivers and subsistence fisheries. It is important to acknowledge and understand all sources of chum mortality and the ~~relative~~ cumulative impact of various fishing activities. Therefore, in light of the critical importance of chum salmon to Western Alaska communities and ecosystems, consideration of additional measures to further minimize western Alaskan chum bycatch in the pollock fishery is warranted.

**Purpose of the action:**

The purpose of this proposed action is to develop actions to minimize bycatch of Western Alaska origin chum salmon in the Eastern Bering Sea pollock fishery consistent with the Magnuson-Stevens Act, National Standards, and other applicable law. Recent genetics stock composition information indicates that the majority of non-Chinook bycatch in the pollock fishery is of non-domestic hatchery origin; therefore, alternatives should structure non-Chinook bycatch management measures around improving performance in avoiding Western Alaska chum salmon specifically.

The Council intends to establish regulatory non-Chinook PSC management measures that protect Western Alaska ~~and Yukon~~ chum ~~escapement goals and subsistence harvests~~; provide incentive for the pollock trawl fleet to improve performance in avoiding non-Chinook salmon while achieving the objectives of the Amendment 91 **and Amendment 110** Chinook salmon PSC management program; meet the requirements of the Magnuson-Stevens Act, particularly to minimize salmon PSC to the extent practicable under National Standard 9; include the best scientific information available including Local Knowledge and Traditional Knowledge as required by National Standard 2 ~~Alaska Native Traditional Knowledge and the social science thereof as required in relation to National Standard 2~~; take into account the importance of fishery resources to ~~effects of salmon bycatch on~~ fishing communities including those that are dependent on Bering Sea pollock and subsistence salmon fisheries ~~and ensure the sustained participation of western Alaska communities in subsistence salmon fishing~~ as required under National Standard 8; and to achieve optimum yield in the BSAI groundfish fisheries on a continuing basis, ~~as calculated after taking into account the social, economic, and ecological impacts of bycatch~~ in the groundfish fisheries as required under National Standard 1.

**Additional objectives** *(all that are listed in proposals)*:

* achieving optimum yield in the directed pollock fishery {as calculated after taking into account the social, economic, and ecological impacts of bycatch in the groundfish fisheries as required under National Standard 1}
* maintaining priority avoidance of Chinook salmon as outlined under the objectives of the Amendments 91 and 110 salmon PSC management program
* minimize salmon bycatch to the extent practicable under National Standard 9
* include Alaska Native Traditional Knowledge and the social science thereof, as required in relation to National Standard 2
* take into account the effects of salmon bycatch on fishing communities and
* ensure the sustained participation of Western Alaska communities in subsistence salmon fishing as required under National Standard 8 [Purpose of the action cannot be to *ensure* subsistence opportunity – depends on the jurisdiction of another management agency.] From NS8 guidelines: "This standard requires that an FMP take into account the importance of fishery resources to fishing communities. This consideration, however, is within the context of the conservation requirements of the Magnuson-Stevens Act. Deliberations regarding the importance of fishery resources to affected fishing communities, therefore, must not compromise the achievement of conservation requirements and goals of the FMP."