

Inshore SSIP Chinook Responses to June 2014 Council Motion's Alternative 3.

**Alternative 3.** Revise Federal regulations to require that IPAs include the following provisions:

**Option 1.**      **Restrictions or penalties targeted at vessels that consistently have significantly higher Chinook salmon PSC rates relative to other vessels fishing at the same time. Include a requirement to enter a fishery-wide in-season PSC data sharing agreement.**

**Inshore SSIP Response.** The Inshore SSIP response to Alternative 3, Option 5 addresses this issue for B Season fishing, leaving the A Season for consideration under Option 1. The Inshore SSIP will utilize an outlier style approach for restricting vessels that have Chinook bycatch significantly higher other vessels fishing at the same time.

1. An “outlier vessel” is identified by having an “end of A Season” bycatch rate that exceeds 1 standard deviation above the Inshore SSIP fleet’s mean A Season bycatch rate for 2 consecutive A Seasons.
2. On inclusion of this provision in the Inshore SSIP IPA, the initial data set for determining outlier status would reach back one A Season from implementation date of the revised SSIP IPA.
3. The second data set will use the A Season data from the A Season after implementation (the 2<sup>nd</sup> of 2 years) to calculate the first group of “outliers”.
4. Vessels identified as an “outlier” will be subject to an expanded Chinook Conservation Area closure for the duration of the following A Season.

Data Sharing: All pollock IPAs have already entered into a standalone Chinook PSC data sharing agreement. The revised SSIP IPA would include the existing data sharing agreement (or a revised agreement as negotiated by all 3 IPAs).

**Option 2.**      **Required use of salmon excluder devices, with recognition of contingencies.**

**Suboption: Required use of salmon excluder devices, with recognition of contingencies, from Jan 20 – March 31, and Sept 1 until the end of the B season.**

**Inshore SSIP Response.** The revised Inshore SSIP IPA will include an excluder use requirement. Excluders would be required for all A Season tows and for all tows made after August 31st of each B Season.

Excluders would be defined in a similar manor as in the AFA CV ICA for halibut excluders as follows:

Salmon Excluder. Each Inshore SSIP member Vessel shall use a salmon excluder bycatch reduction device (BRD) on every Bering Sea pollock trawl tow made during the date requirements. The salmon BRD used must, at a minimum, be constructed and installed in a manner similar to salmon BRD devices that are generally recognized by SSIP members as effective for reducing salmon bycatch. However, this provision is not intended to prohibit or restrict the development and implementation of new salmon BRDs, provided that there is a reasonable expectation of increased salmon bycatch reduction through their use. Notwithstanding the foregoing, SSIP member Vessels that are in compliance with this protocol as of the beginning of a pollock fishery season, and who subsequently suffer irreparable damage to their BRD, shall be relieved of their obligation to comply with this protocol on the condition that they notify the Inshore SSIP Manger as of the next delivery following such damage that they are claiming this exemption.

Salmon Excluder Use Exemption Contingencies:

1. Vessels could apply for an exemption to the excluder requirement if their fishing methodology conflicted with current generally accepted excluder designs (for example the Chelsea K's pump system). This exemption would require an annual exemption request made to the Inshore SSIP Manager by the vessel. Exemptions are limited to a total of 3 years.
2. Vessels making less than 3 trips in a season are not required to use an excluder. This exemption also has a 3 year limit.

**Option 3. A rolling hotspot program that operates throughout the entire A and B seasons.**

**Inshore SSIP Response.** The Inshore SSIP IPA will be amended to run operate the Chinook RHS component 100% of time; A and B seasons.

(A chum RHS program, if/when integrated into the SSIP, will operate only during the B Season.)

**Option 4. Salmon savings credits last for a maximum of three years for savings credit based IPAs.**

**Inshore SSIP Response.** Inshore SSIP Salmon Savings Credits will have a maximum lifespan of 3 years. Vessels would earn one Salmon Savings Credit for every 3 Base Cap Credits not used in a year.

**Option 5. Restrictions or performance criteria used to ensure that Chinook salmon PSC bycatch rates in the month of October are not significantly higher than those achieved in the preceding months.**

**Inshore SSIP Response.** The Inshore SSIP would utilize a rate based fishing restriction program for vessels fishing in the month of October.

1. Determine a “preceding months” comparison rate based on the average September Chinook bycatch rates from the years 2009 – 2013. This would be the **September Average** and calculates to .05 Chinook per metric ton of pollock harvest.
2. Determine a “...not significantly higher...” threshold bycatch rate for October fishing by increasing the September Average by 100%; a rate of 0.10 Chinook per metric ton of pollock harvest. This is the **Performance Threshold**.
3. Calculate an upper bycatch limit at 200% of the Performance Threshold; a rate of 0.20 Chinook per metric ton of pollock harvest. This is the **Performance Threshold Ceiling**.
4. Vessels fishing in the month of October will have their running bycatch rate calculated at the end of each October fishing trip (an accumulative rate for all trips made in the month of October) – the **Vessel Bycatch Rate**.
5. Vessels fishing in the month of October must maintain a **Vessel Bycatch Rate** below the **Performance Threshold** in order to continue fishing unrestricted.
6. Vessels with a Vessel Bycatch Rate in excess of the **Performance Threshold** and under the **Performance Threshold Ceiling** are allowed to make a “conditional” October fishing trip – the **Redemption Trip**.
7. If a vessel is able to reduce its **Vessel Bycatch Rate**, as a result of its **Redemption Trip**, to a level below the **Performance Threshold** it may continue fishing in the month of October.
8. If, after the completion of a **Redemption Trip**, a vessel fails to lower its **Vessel Bycatch Rate** to a level below the **Performance Threshold** it is done fishing for the B season.
9. Vessels with a **Vessel Bycatch Rate** in excess of the **Performance Threshold Ceiling** are not allowed a **Redemption Trip** and are done fishing for the B season.

Inshore October Fishing Restrictions Under Alternative 3 Option 5		Vessel A	Vessel B	Vessel C
Trip 1	Pollock catch in mt.	250	250	250
	Chinook Bycatch	20	45	51
	Vessel Bycatch Rate; Chinook per metric ton	0.08	0.18	0.204
Current October Status		Under Performance Threshold; Eligible to continue fishing	Over Performance Threshold; May make a Redemption Trip	Bycatch Rate Exceeds Performance Threshold Ceiling; Done Fishing for the B Season
Trip 2	Total Oct. Pollock catch in mt.	500	525	
	Total October Chinook Bycatch	36	58	
	Vessel Bycatch Rate; Chinook per metric ton	0.072	0.1105	
Current October Status		Under Performance Threshold; Eligible to continue fishing	Still Over Performance Threshold; Done Fishing for the B Season	
Trip 3	Total Oct. Pollock catch in mt.	800		
	Total October Chinook Bycatch	48		
	Vessel Bycatch Rate; Chinook per metric ton	0.06		
Current October Status		Under Performance Threshold; Eligible to continue fishing		
Trip 5	Total Oct. Pollock catch in mt.	1,100		
	Total October Chinook Bycatch	95		
	Vessel Bycatch Rate; Chinook per metric ton	0.0864		
Current October Status		Has Completed B Season Pollock Harvest		