

SALMON TECHNICAL TEAM REPORT ON FISHERY MANAGEMENT PLAN
AMENDMENT SCOPING FOR DE MINIMIS FISHERIES ASSOCIATED WITH
KLAMATH RIVER FALL CHINOOK IMPACTS

The Salmon Technical Team (STT) believes that it is unrealistic to expect that the technical analyses necessary to support a fishery management plan (FMP) amendment can be completed and reviewed in time for approval and application for the 2007 season. Substantial effort will be required to determine the scope of the amendment, identify alternatives, and complete biological and economic analyses. The STT recommends that the Council delay its target date for consideration and completion by at least one year. Even then, the Council should seek additional staff resources to complete these activities as workloads of STT members include responsibilities for day-to-day management of fisheries as well as duties relating to Council activities.

The STT recommends that the issues of *de minimis* fisheries and the determination of overfishing and rebuilding from overfished conditions be considered concurrently when developing the scope of the proposed FMP amendment. This would address a current anomaly wherein the consequences of an overfished stock that is anticipated to fail to meet its conservation objective can be more severe than if the stock is actually overfished or listed under the Endangered Species Act (ESA). For example, if the Klamath Fall stock is anticipated not to meet its conservation objective, the Council is required to close salmon fisheries within its jurisdiction which impact the stock. If the stock were already overfished and operating under a rebuilding plan or if it was listed under the ESA, some level of fishery impacts could be permitted while the stock is recovering. Consideration of *de minimis* fishery impacts are most appropriately evaluated within the context of potential effects on rebuilding a stock to desired levels. Several alternatives could be developed to provide an analytical framework to investigate various approaches. For example, floor levels tied to conditions that are believed to pose serious risks of irreversible damage to the reproductive capacity of a stock could be established to trigger an automatic no-fishing response. A system incorporating conservation actions that become progressively more restrictive with increasing risk of triggering an overfishing condition could be developed. Hairline triggers could be replaced by triggers that consider the level of uncertainty in the statistics (e.g., spawning escapement levels, exploitation rates) that are used to determine if overfishing has occurred.

With respect to the consideration of FMP amendments relating to the issue of *de minimis* fisheries for Klamath River Fall Chinook, the STT recommends that this activity be integrated and consolidated with the anticipated requirement to prepare a rebuilding plan for this stock to the maximum extent practicable. An overfishing concern is expected to be triggered for this stock in 2006, resulting in an investigation into likely causes and initiation of efforts to develop a rebuilding plan. The STT recommends that state and tribal staff most familiar with Klamath fall chinook have the primary responsibility for completion and reporting of required analyses; representatives from the STT and SSC should also actively participate.

PFMC
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