

SALMON TECHNICAL TEAM REPORT ON
FISHERY MANAGEMENT PLAN AMENDMENT 15 (*DE MINIMIS* FISHERIES)

The Salmon Technical Team (STT) is concerned that the demanding time schedule has not allowed for a thorough examination of the SSRM and the resulting implications of *de minimis* fisheries on Klamath River fall Chinook (KRFC). The process to verify the SSRM was conducted over three meetings, one of which was this week; at each meeting the results changed in magnitude although the relative levels remained the same.

While the age-4 ocean impact rates on KRFC under consideration for *de minimis* fishing reflect substantial reductions in fishing opportunity for the commercial troll fishery, the STT is concerned that the impact rates associated with the 10% Cap and 13% Cap Alternatives fall well within the range that has been targeted by the Council since 1991. These rates seem to be inconsistent with the goal of reducing fishery impacts in years when the stock is in a depressed status and forecast to fail to meet the escapement floor of 35,000 natural adult spawners.

The STT has little confidence in the SSRM-based estimates of the absolute level of risks presented in the environmental assessment, but believes that the relative magnitude of risks presented by the different options is reasonable.

The STT feels the metrics in Figure ES-2 (page viii) and Figure 4.4 (page 69) that are important to consider are:

- Spawning escapement below 35,000 (floor),
- Tributary spawning escapement below 720,
- Spawning escapement below 12,000,
- Age-4 ocean harvest rate exceeding 16% (NMFS ESA consultation standard for California Coastal Chinook).

PFMC
11/17/06