

SALMON ADVISORY SUBPANEL REPORT ON
MAGNUSON-STEVENSON ACT REAUTHORIZATION IMPLEMENTATION

The Salmon Advisory Subpanel (SAS) is concerned that the comment period for the proposed rule for the process of setting annual catch limits will not include a Pacific Council meeting; therefore we offer the following comments for the record.

It is important that salmon fisheries be given special attention due to their use of annual stock specific spawning escapement and exploitation rates as conservation and management objectives rather than stock specific catch quotas. Requiring salmon fisheries to track stock specific quotas inseason would be almost impossible from a monitoring standpoint. Because of the short life span and multiple age classes of salmon stocks, annual abundance is highly variable. The current Salmon Fishery Management Plan requires annual management measures that predict that all stocks will meet their conservation objective annually. Because of this management system and the naturally variable stock abundance, stocks that drop below their conservation objective usually recover before there is a need for a rebuilding plan. There has been only one overfishing concern triggered since 1995, and changing the management system for a bureaucratic requirement falls into the category of fixing something that ain't broke.

PFMC
11/05/07