The Salmon Advisory Subpanel (SAS) has discussed at length the presentation made by the Ecosystem Advisory Subpanel (EAS) re-ecosystem-based management. We have the following observations and recommendations to make to the Pacific Fishery Management Council (Council).

1. There is considerable concern regarding the potential regulatory actions that might accompany ecosystem-based management. These concerns range from the sheer complexity of dealing with multiple ecological interactions among species; the potential for conflict among different groups, including fishermen, communities, non-governmental agencies and management agencies, as well as the cost of overlaying yet another regulatory burden upon an already highly regulated community. We view ecosystem-based management as having the potential to be a useful tool in making management decisions, but not a regulatory mechanism.

2. While the SAS is supportive of continuing research on the California Current Ecosystem as it pertains to salmon, we point out that the salmonid life cycle interacts with at least three ecosystems, and, in the case of some of our far north migrating stocks, a fourth. These are extremely complex relationships and not well understood. We strongly believe that ecosystem-based management for salmon should include the estuarine and freshwater environments as well as the ocean, as identified in the Council’s essential fish habitat (EFH) description. We bring to the Council’s attention the curtailments of ocean salmon harvests in Oregon and California from 2006-2009 due to flow and temperature issues in the Sacramento and Klamath rivers which seriously reduced salmon populations. Separating out any part of the salmonid ecosystem from consideration in ecosystem-based management seems self-defeating.

3. We note that current research is at a very early stage, with untested assumptions and hypotheses that will require significant financial resources to support the future efforts necessary to underpin development of this potential management approach. We doubt that the current methodologies and models being developed are sophisticated enough for this kind of endeavor, and are concerned about the potential cost to the taxpayer to develop and operate this management tool. We support development of ecosystem-based management as a tool to supplement current management structures, recognizing that it will take a good deal of time to develop the technical tools and refine the concepts necessary to its successful implementation. We also are aware of the heavy workload that the Council is charged with, and believe consideration should be given as to how such a complex tool is to be developed and supported.

4. We are not comfortable with an ecosystem-based analysis that excludes protected species from the management arena. These may be avian (e.g., Caspian terns and double-crested cormorants) or marine mammals (e.g., orcas and sea lions), to name a few examples. But if study regarding ecosystem-based management is to be credible, it must include all parts of the ecosystem and not eliminate any part due to external pressures.
While we are, in principle, supportive of the concept behind ecosystem-based management, we also believe there are serious concerns that need to be addressed as noted above before it can take its place as a viable management strategy.

PFMC
05/24/11