

SALMON AMENDMENT COMMITTEE REPORT ON FISHERY MANAGEMENT PLAN  
AMENDMENT 15 (DE MINIMIS FISHERIES)

The Salmon Amendment Committee (SAC) met and discussed Preliminary Draft Amendment 15 and has the following recommendations and comments:

1. Limit the amendment action (page 2) to issue 1, *de minimis* fishing rate for Klamath River fall Chinook salmon (KRFC). The other 3 issues are either technical in nature (issue 3) or not feasible to complete within the amendment time frame shown on page 3. The Council is urged to focus on the importance of “avoiding the emergency rule process” for 2007 when KRFC is again likely to be below its conservation objective and require emergency regulations to allow any level of ocean fishing within the KRFC management area.
2. Maintain the current KRFC conservation objective and provide for stock-specific *de minimis* fisheries under Section 3.2 re: Overfishing Criteria.
3. The Council should consider adopting a tentatively preferred alternative at its September meeting, before the public hearings, rather than waiting until the November decision meeting.
4. All of the fishing rates shown in Table 1 should be expressed as age-4 ocean impact rates, which includes landed catch and non-landed catch mortalities. The SAC had a lengthy discussion about the various ways to express fishing rates. It was decided that inclusion of the other adult age classes (3s and 5s) in the metric might be confusing to fishermen and managers (because of the variable annual contribution of these other age classes to the catch). The metric currently used in the jeopardy opinion for California coastal (CC) Chinook is based on landed catch only of age 4 fish. In 2006, the age-4 ocean harvest rate on KRFC was 11.5%; if nonlanded mortalities were included the age-4 rate would be 13.8%. The inclusion of non-landed catch in Council fishing rate metrics is important because it includes all fishery-related mortalities including those stemming from existing and potential future ocean selective fisheries for marked hatchery fish and associated non-catch mortality of unmarked fish.
5. A table should be provided in the document showing the relationship between age-4 ocean impact rate and other ways for expressing ocean fishing rates for KRFC; i.e., age-4 ocean harvest rate, spawner reduction rate and ocean harvest rate (across all age classes). It is important to note that Table 2, page 7, will need to be modified to show ocean fishing rates in column 2 in terms of age-4 ocean impact rates.
6. The catch of KRFC under all the alternatives will remain as  $\leq 16\%$  age 4 KRFC ocean harvest rate, the jeopardy standard for CC Chinook salmon.
7. The SAC recommends that alternative 4, “Exploitation Rate Matrix,” be eliminated, at least for the current amendment effort. The inclusion of a second stock, Sacramento River fall Chinook salmon (SRFC) greatly complicates the analysis. Moreover, such an analysis should not be attempted until the components of the matrix are evaluated individually and collectively.
8. The SAC recommends that document verbiage with regard to “lower limit reference point” be changed to “*de minimis* fishery threshold,” which is a population abundance level slightly higher, depending on the alternative, than the conservation standard for KRFC of 35,000

adult natural spawners. No change in reference to the escapement floor is proposed as part of this initiative.

9. Separate alternatives should be developed for the two fixed rate alternatives, shown as Alternative 3 on page 4 (See Table, below).
10. A fifth alternative should be added, which we will call the “Rebuilding” alternative (see Table below). This proposed new alternative is basically an add-on feature to each of the *de minimis* fishery alternatives. It would specify that no *de minimis* fishery for KRFC can be prosecuted for more than three (3) consecutive seasons and that *de minimis* fishing cannot resume until the stock has sustained itself at or above its minimum conservation objective for three consecutive seasons. Inclusion of such a provision would be consistent with existing overfishing criteria, would serve to initiate stock rebuilding in a timely manner, and shows that overfishing requirements under the Magnuson-Stevens Fishery Conservation and Management Act are being addressed.
11. The Council could consider a provision for the fishery management plan (FMP) that establishes a Council internal process to add or change *de minimis* fishing rates for Council-managed stocks (including KRFC) without the need for an FMP amendment. This process should specify the need to maintain the long-term productivity of the stock and to carefully analyze the impact of the action on coastal communities as well as terminal area fisheries. An example of an existing FMP provision for changing natural stock objectives can be found at Section 3.1.2. **Please note: there was not consensus on the inclusion of this provision in the amendment.**
12. A Monitoring and Evaluation section should be added to the document. It should specify the need for ongoing fishery monitoring, include a description of a process for reviewing and evaluating the effectiveness of the amendment, and the inclusion of criteria for the measuring amendment effect relative to amendment objectives and the relevant issues identified in document Section 1.4.
13. The SAC identified a number of relevant issues for inclusion under Section 1.4 including KRFC sub-stock concerns, community impacts, ESA constraints, inriver recreational harvest opportunity, tribal/nontribal sharing, achievement of MSY or OY over the long term, and salmon carcass ecosystem contributions.
14. SAC members were provided e-copies of the Preliminary Draft Amendment and have been asked to provide editorial comments directly to the Document Team coordinator.
15. SAC members provided input to the Document Team regarding features of the biological model. Further discussions will be held regarding the economic analysis. One (of many) recommendations for the biological model was that fall fisheries should not be allowed in years when *de minimis* fishing takes place.
16. The SAC is very concerned about the time available for economic impact analysis, because economic input data will be dependent upon completion of the biological modeling. There are only 7 weeks between the end of the June Council meeting and the next SAC meeting in early August when the Draft Amendment is supposed to be ready for SAC review. This does not give much time for either analysis (biological or economic), technical review of the analyses, and to prepare a second, larger document. **We request the Council discuss the possibility of implementing a Plan amendment for 2007 on a less strenuous time schedule, particularly for preparation of the Draft Amendment, when most of the work will have to be done.**

<b>Alternative</b>	<b>Description</b>	<b>Comment</b>
1--Status Quo	(no change is proposed in existing wording)	(no change proposed in existing wording)
2--Sliding Scale	Reword to explain metrics in terms of age-4 ocean impact rates	Equivalent to the KFMC recommendation, but expressed in terms of the metric proposed by the SAC
3--5% Ceiling	Metric should be expressed as age-4 ocean impact rate and provide for a range of 0-5%	(no change proposed in existing wording)
4--10% Ceiling	Metric should be expressed as age-4 ocean impact rate and provide for a range of 0-10%.	(no change proposed in existing wording)
5--Rebuilding	Under this add-on alternative, no <i>de minimis</i> fishery for KRFC could be prosecuted for more than three consecutive seasons and that <i>de minimis</i> fishing may not resume until the stock has sustained itself above its minimum conservation objective for no less than three consecutive seasons.	Inclusion of this provision with any of the above <i>de minimis</i> fishing options would be consistent with existing overfishing criteria and would serve to initiate stock rebuilding in a timely manner.

PFMC  
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