

SALMON ADVISORY SUBPANEL REPORT ON FISHERY MANAGEMENT PLAN AMENDMENTS TO IMPLEMENT ACL REQUIREMENTS

The Salmon Advisory Subpanel (SAS) identified several issues that are important to consider within the scope of the annual catch limit (ACL) amendment process for the Salmon Fishery Management Plan (FMP).

First, there are many concepts in the current FMP that are consistent with the intent of the ACL and accountability measures (AM) requirements of the Magnuson-Stevens Act (MSA). The amendment should explain this.

The terms overfishing and overfished imply a cause for determining the status of salmon stocks. These terms are frequently inappropriate because in many cases the cause of stock depletion is not fishing. The amendment should consider including terminology for stock depletion, which is independent of fishing and fishery management. AMs should also be related to the source of problems.

The assessment of uncertainty in salmon management and salmon science will be a difficult task, particularly due to the confounding effects of environmental factors, which can have dramatic effects on salmon stocks. Because of the short life history of salmon, it can be very difficult to incorporate such uncertainty into the management process.

The amendment should consider stock aggregate ACLs, which could be used to protect individual stock or sub-stock productivity. For example, the Klamath fall Chinook spawning escapement floor was designed to ensure adequate escapement of tributary populations.

All conservation objectives should be reviewed to determine if and how uncertainty was incorporated when the objectives were developed.

The issue of multiple jurisdictions affecting achievement of conservation objectives is applicable to every stock in the FMP. The amendment should consider alternatives that establish ACLs specific to Council managed fisheries.

The amendment should consider status determination criteria that are based on risk to the productive potential of the stock, not just whether maximum sustainable yield was achieved. An example would be a minimum spawning escapement below which there is genetic risk or other compensatory mechanisms may occur.

The amendment should identify and account for salmon bycatch in other fisheries.

The amendment should consider alternatives for excepting stocks managed under the Pacific Salmon Treaty (PST) from the ACL and AM provisions, specifically all coho stocks in the FMP and all Chinook stocks from the mid-Oregon coast north. The relationships and any discrepancies between FMP management objectives and PST objectives (and Comprehensive Coho Agreement) objectives should be clarified and resolved in this amendment.