SALMON ADVISORY SUBPANEL REPORT ON SALMON ENDANGERED SPECIES ACT CONSULTATION RECOMMENDATIONS

The Salmon Advisory Subpanel (SAS) met in joint session with the Groundfish Advisory Subpanel (GAP) and Susan Bishop to review the Groundfish Management Team (GMT) report on the Salmon Endangered Species Act (ESA) Consultation Standards. The SAS offers the following comments.

The SAS appreciates the work done by the National Marine Fisheries Service (NMFS) to analyze salmon bycatch in the groundfish fishery. The SAS is concerned with bycatch in the mid-water trawl rockfish fishery and is equally concerned with the bycatch levels in the whiting trawl fishery. There appears to be no correlation between salmon abundance and bycatch levels in the whiting fishery and there is considerable uncertainty about bycatch in the non-whiting midwater trawl and bottom trawl fishery. The inability to anticipate salmon bycatch and reduce trawl impacts is troubling and presents a significant issue for salmon managers and fishers. The anticipated 2017 salmon season illustrates that concern, the entire salmon fleet is capped at a harvest of approximately 800 Klamath River origin salmon, while the mid-water trawl rockfish fishery has a proposed cap of 4,500 salmon catch, irrespective of stock composition in that bycatch. We would remind the Council that Klamath River fish serve as a surrogate for ESA listed California Coastal Chinook.

The SAS appreciates the efforts by the whiting fleet to avoid salmon bycatch. The reality remains that the consequence remains solely at the expense of the salmon fleet and the communities that depend on salmon fishing. An additional trawl fishery that removes salmon through bycatch, has the potential to increase the burden shouldered by the salmon fleet.

In addition, the Klamath fishery is shared equally with California tribes. The California tribes have relied on these resources since time immemorial and in more recent times the resource has been shared with non-tribal fisheries on a 50-50 basis.

The SAS recommends the following:

- 1. The allowable bycatch in both the whiting and mid-water rockfish trawl fishery be limited on a time and area specific basis. In order to spread the risk across multiple salmon stocks. This might require smaller caps on boats fishing within some areas and restrictions on the number of boats allowed to fish in some areas. We recommend that the caps be limited and that once the bycatch has been attained, the area be closed to that gear sector.
- 2. The mid-water rockfish trawl fishery be capped at no more than 3,000 salmon until more actual catch data are compiled.
- 3. All salmon bycatch in the mid-water rockfish trawl and bottom trawl fishery be retained for genetic and quantitative coded wire tag analysis to determine impact rates by salmon stock.
- 4. In Council managed fisheries closed to directed salmon fishing, mid-water rockfish trawl be prohibited and bottom trawl fishermen be required to use selective flatfish trawl (SFFT) gear shoreward of the RCAs.

The SAS recommends that further analysis be done to evaluate:

- 1. The use of salmon excluders on trawl nets.
- Bycatch reduction realized by prohibiting trawl fishing at night.
 How the bycatch of Age-2 Klamath River salmon relates to reduction of California Coastal adult fish.

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