

SALMON ADVISORY SUBPANEL REPORT ON LEGISLATIVE MATTERS - HR 3916

The Salmon Advisory Subpanel (SAS) has reviewed the draft letter from the Council regarding HR 3916 (Agenda Item G.1.a, Attachment 11). The SAS agrees with and supports the comments of the Pacific Council and its Legislative Committee.

In our view, disrupting the current structure of Federal jurisdiction over Endangered Species Act (ESA)-listed salmon will only further complicate an already complex system. The National Marine Fisheries Service (NMFS) has been involved with the conservation of ESA-listed salmon for decades. During the course of those years, NMFS has gained the knowledge, background, and experience needed for successful salmon management. State, Tribal, and Council staff, along with stakeholders, have worked diligently with NMFS over the years to build a strong working relationship. To transfer jurisdiction of the anadromous fish away from NMFS would breakdown those relationships, and disrupt the long-established process of salmon management.

To assign jurisdiction to a different Federal agency, who would have to step in and learn the complex nature of salmon management, does not appear to be an efficient use of Federal time and money, especially when there is no obvious problem. NMFS is perfectly placed to understand *all* of the ocean fisheries that encounter salmon, whether it is a directed salmon fishery or one that incidentally handles salmon while targeting another species.

The SAS does not support HR 3916, and strongly believes that NMFS should maintain jurisdiction over ESA-listed salmon, consistent with status quo.

PFMC  
11/15/17