

## SALMON ADVISORY SUBPANEL REPORT ON THE DRAFT SALMON REBUILDING PLANS

On Friday, November 2, 2018 the Salmon Advisory Subpanel (SAS) heard a presentation from the Salmon Technical Team (STT) on the Draft Rebuilding Plans for 3 Coho and 2 Chinook stocks. Agenda Item D.2, Attachments 1 – 5. We appreciated the diligence of the STT and the quality of the Draft Plans. While we do note the reports are not fully complete, they do address the most critical issues.

The SAS supports the “no-action” alternative, noting particularly the conservation measures already built into the existing control rules that reduce fishing impacts when projected populations are low. We also note that the existing control rules basically define maximum impacts, and the Council has been diligent in making management decisions that are intended to keep impacts below the maximum when population levels are lower than desired. We believe that this flexibility is critical to allowing the Council to evaluate the status of each stock on a yearly basis and to incorporate the appropriate conservation measures into each year’s management measures. Our support for the no-action includes the observation that the rebuilding time for these stocks is not significantly improved by the other alternatives, which do have dramatic impacts to the fishing communities. In a precautionary tone, we note that the STT rebuilding projections are based on past performances, which may or may not prevail should future climate conditions deteriorate.

The SAS notes that the rebuilding plan clearly identifies that the impacts of fish removals through the ocean fisheries are not the primary causative factor leading to the overfished status of these runs. As found in the Draft plan, we note that ocean fisheries landed approximately 25 percent of their average catches in the 3 years leading to the overfished declaration. These identified non-fishery concerns include dramatic reductions in hatchery production, and increases in predation on out-migrating and returning stocks from marine mammals, invasive species, and birds for both Coho and Chinook stocks. Thus, we note that further restrictions on fisheries are unlikely to rebuild these stocks absent significant changes in freshwater habitat and management.

The SAS also believes that it is critical to improve the recruitment of salmon to the ocean fishery, through increases in the numbers of smolts that successfully survive their passage through inland waters, estuaries, and deltas. Additionally, because naturally spawned fish have traditionally been a critical contributor to our fish stocks, this should include ways to improve the survivability of both natural and hatchery-spawned stocks in their outward migration. In order to address these issues, we request that at this meeting, the Habitat Committee be charged to work with the STT to incorporate and strengthen the following issues and discussions in the Rebuilding Plan; including but not limited to:

For the Sacramento Fall Run Chinook; In section 4.7 (Further Recommendations) Paragraph 5, we note the list of potential issues. To those we would add and expand to include:

- Spring flow standards for the Feather and American rivers

- Major reductions in entrainment of juveniles into the water project pumps
- Mandates to maintain Delta water quality standards in all water conditions, unlike what occurred in 2015
- Elimination of redd de-watering
- Evaluation of temperature controls on the Feather (Thermalito) and American rivers
- Evaluation of changes in natural production over time; e.g. extinction of fast flow Feather River spawners
- Improvements in SI forecasting models; e.g. incorporate Age-2 in-river harvest
- Evaluation of juvenile mortality in the San Francisco Bay
- Evaluation of effect of multiple pollutants on juvenile survival
- Addressing resolution of the temperature and flow issues discussed in the plan
- Evaluation of hatchery production and the health and quality of smolts, including associated release practices and strategies
- Restoration of spawning habitat through channel reconstruction and restoration, particularly in light of recent fires in the upper Sacramento basin.

PFMC

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