

SALMON ADVISORY SUBPANEL REPORT ON SOUTHERN OREGON/NORTHERN
CALIFORNIA COHO ENDANGERED SPECIES ACT CONSULTATION

The Salmon Advisory Subpanel (SAS) heard a report from the Ad Hoc Southern Oregon/Northern California Coast (SONCC) Coho Workgroup (Workgroup) and was briefed by Ms. Susan Bishop from National Marine Fisheries Service (NMFS) on the final draft Risk Assessment and the current Range of Alternatives for a harvest control rule (HCR) provided to the Pacific Fishery Management Council (Council) for consideration. The SAS understands that the Council is scheduled to adopt preliminary preferred alternative(s) here at the September meeting for public review and select a Final Preferred Alternative for recommendation to NMFS at the November Council meeting. The SAS notes that this effort has occurred under a compressed time frame and is based on relatively limited data. The SAS believes that additional time would help all stakeholders better understand the potential impacts.

The SAS has reviewed the ten alternatives, which are total (ocean and freshwater) HCRs with a fixed exploitation rate (ER) ranging from zero to 20 percent. This concept of a total HCR is different from the current HCR which is an ‘ocean only’ ER of 13 percent while the total ER includes fisheries that are outside of the Council’s jurisdiction.

SAS representatives have had limited time to discuss potential ramifications to ocean fisheries nor have State Delegations had sufficient time to discuss potential fishery impacts. Additionally, the SAS does not have a complete understanding of freshwater exploitation rates or sharing arrangements between comanagers or between Oregon and California. Therefore, the SAS finds it difficult to identify a preliminary preferred alternative at this time.

The SAS would like more information on what future freshwater impacts may be and how they might be determined before recommending a preliminary preferred alternative. It is not clear to the SAS what proportion of the total allowable catch (or ER) would be needed to conduct the freshwater fisheries or what balance might remain for ocean fisheries. Without that information, the effect of the alternatives on ocean fisheries cannot be evaluated.

The SAS recommends that a thorough review be conducted regarding how ocean impacts upon SONCC Coho salmon (natural and hatchery fish) are estimated, with an eye toward determining if these methods can be improved upon.

Rushing to a decision that is not fully vetted could result in a long-term outcome that could be difficult to modify in the future. The SAS looks forward to a more robust and thoughtful discussion on estimated effects of the HCRs and analyses describing freshwater and ocean impacts for each alternative.