

SALMON TECHNICAL TEAM REPORT ON PRELIMINARY
WEST COAST REGIONAL FRAMEWORK FOR DETERMINING
THE BEST SCIENTIFIC INFORMATION AVAILABLE

The Salmon Technical Team (STT) has reviewed the draft West Coast Framework for Best Scientific Information Available (BSIA) including Agenda Item C.4, Attachments 1-3, and has the following comments.

Footnote e/ of agenda item C.4, Attachment 2, states that, “The Scientific and Statistical Committee (SSC) has not formally reviewed any of the escapement estimation methods used to inform determination of overfished status”. The STT notes that escapement estimates are primarily made by regional scientists with expertise in escapement estimation within the management entities that collect and analyze data, and then ultimately produce the estimates. Modification to these methods can occur as annual conditions change (e.g., redd surveys can be performed instead of mark-recapture surveys if conditions do not allow for repeated stream access). There are many examples of substantial review processes that are conducted for escapement estimation methods that take place each year. Additionally, estimation and review is performed under very short time frames so as to make the escapement estimates available for stock assessments and fishery planning during the winter/early spring time frame. It is unclear how the SSC could perform a review of escapement estimation methods given the nature of escapement estimation and the annual management schedule. This appears to be acknowledged in footnote d/, which states: As noted in National Marine Fisheries Service (NMFS) Procedure 01-101-10: "Within fishery management plants (FMPs) there are some stocks that will require altered or abbreviated BSIA procedures because of extremely short timelines or a preponderance of involvement by State or Tribal entities, such as for Pacific salmon with the Pacific Fishery Management Council (Council)..."

Footnote e/ of agenda item C.4, attachment 2, also states “Of note, the standard review time in COP4 is two weeks. At least since 2013, Preseason Report 1 has not been released more than four full work days before the start of the SSC and in several cases less than one work day before. The availability of this report is driven by the timing of data availability (often February) and the additional time needed for modeling prior to the March Council meeting.” The STT agrees with this statement and notes that it is infeasible for Preseason Report 1 to be produced any earlier than it currently is given the availability of data and forecasts, the timing of meetings within the Pacific Salmon Commission assessment process, the need to perform retrospective assessments such as cohort reconstructions, and the time required to provide initial harvest model runs given current abundance forecasts and the previous year’s regulations (i.e., the no action alternative). This extensive, combined set of information is vital to our current salmon management process that begins at the March meeting. It is difficult to see how more review time could be provided without fundamentally changing the existing Pacific Council salmon management schedule along with the schedules of the state, Tribal, Federal, and international agencies and entities that provide data and analyses that are essential contributions to Preseason Report 1.

Footnote *f* of agenda item C.4, attachment 2, states “As noted in 81 FR54561, in addition to regional peer review processes established pursuant to the Magnuson-Stevens Act, "NMFS uses other important peer review processes to ensure the use of the BSIA for fishery management decisions. Examples include...Atlantic and Pacific salmon and Pacific hake/whiting, all managed in conjunction with Canada." The STT agrees with this statement but would also point out that substantial peer-review process occur in fora outside of those between the U.S. and Canada.

PFMC
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