

SALMON ADVISORY SUBPANEL REPORT ON
SOUTHERN OREGON/NORTHERN CALIFORNIA COHO ENDANGERED
SPECIES ACT HARVEST CONTROL RULE – FINAL ACTION

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 the Council is scheduled to select a Final Preferred Alternative for recommendation to NMFS at this 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 and mutually agreed solutions by all user groups.

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 (freshwater) that are outside of the Council’s jurisdiction.

We support the California tribes’ recommendations that range from 16 to 18 percent (HCR 6, 7, and 8); however, the SAS encourages the Council to adopt a total ER of at least 15 percent (HCR 5) which is the most NMFS suggests may be supportable under the ESA. In addition, the SAS does support further investigating the concept of using a three-year rolling average approach to allowable ERs rather than using a hard-cap.

The SAS does not have a complete understanding of freshwater ERs or sharing arrangements between co-managers or between Oregon and California. Therefore, the SAS finds it difficult to fully understand the impact of each 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 wants to reiterate our feeling that this process has been rushed, with limited and questionable data generating techniques, which have potential to shut down salmon fisheries in California and Oregon. The poor status of these stocks is not caused by ocean fisheries, and negative environmental conditions continue to be the main contributing factor. The future of these stocks will not be improved by restricting ocean fisheries. The SAS supports efforts to protect SONCC coho within the scope of ocean fisheries but remains concerned with the use of limited and old data to shape future ocean salmon fisheries. The SAS recommends the comanagers improve the data that is available to manage and assess the status of the stocks in this Evolutionary Significant Unit.