PACIFIC COAST FEDERATION of FISHERMEN’S ASSOCIATIONS

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Agenda Item G.3.g
Supplemental Public Comment
November 2005

28 October 2005

Mr. Donald Hanson, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

RE: Klamath River Fall Chinook Conservation Objective – Request for Initiation of a Fishery Management Plan (FMP) Amendment

Dear Chairman Hanson:

The Pacific Coast Federation of Fishermen’s Associations (PCFFA) represents working men and women in the U.S. West coast commercial fishing fleet. Today, at the meeting of its Board, PCFFA Directors unanimously passed a motion supporting an amendment to the Pacific Fishery Management Council’s Salmon Fishery Management Plan (FMP) related to the conservation of Klamath River fall-run chinook salmon. The PCFFA Board respectfully requests the PFMC, at its November 2005 meeting, approve the initiation of a Salmon FMP amendment.

**Situation:** We are faced with very poor recruitment of Klamath fall Chinook for 2006 and probably at least the next two years. It is likely that the predicted abundance of natural spawners will be below the 35,000 floor called for in the current Framework Plan in one or more of those years. This poor recruitment is due to high mortality of juvenile salmon in the river from the parasite *C. Shasta* and other more or less natural causes which are probably influenced by human control of flow regimes in the river. It is **not** due to low escapement numbers of the parents of these fish.

This poor Klamath recruitment threatens to end the ocean commercial fishery between Cape Falcon, Oregon and Point Sur, California, the area managed for Klamath stocks (and over 90% of the ocean fishery for Chinook south of Washington regardless of the abundance of Sacramento fall Chinook and other stocks). The current FMP does not allow for fishing that would result in spawning numbers below the 35,000 floor, and we are informed that an emergency rule that would allow such fishing is unlikely at best.
Over 80 percent of the boats that historically fished salmon off Oregon and California are now gone as a result of restrictions imposed on ocean fisheries in the past twenty-five years. It is hard to imagine how the remainder would survive a total closure of the fishery. It is even harder to imagine the support businesses remaining in place (ice and fuel docks, gear stores, fish buyers/processors) if the fishery were to be re-opened after one or more years of total closure.

The ocean sports fishery in the Klamath Management Zone also faces a likely total closure, as do the in-river sports fishery and the tribal fisheries in the river (especially if there were two or more years of sub-35,000 predictions; in the first such year the tribes would probably be allowed to catch as many Klamath fish as the ocean fishery had caught the previous fall).

**Remedy:** PCFFA asks the PFMC to begin scoping a Framework Plan Amendment limited to considering *de minimus* fisheries that would result in escapements below the floor. Such fisheries would need to be large enough to be worth pursuing, but constrained to an overall harvest rate for all fisheries small enough not to impede recovery whenever the spawners left after fishing encountered favorable habitat conditions. We ask PFMC to concentrate its scoping efforts on determining what that overall harvest rate might be.

In short, PCFFA concurs with the Klamath Fishery Management Council (KFMC) statement on *de minimus* fisheries except that we believe the appropriate *de minimus* harvest rate should be the product of PFMC’s scoping process, not the starting point except for descriptive purposes, i.e., “if you used this rate, here’s how it would work.”

PCFFA is not asking for a change in the two-thirds harvest rate under abundant conditions, nor in the 35,000 floor. We suggest a plan in which fisheries would be proportionally constrained as they are now whenever predicted abundance fell between around 105,000 natural spawners (the minimum number that allow full fishing), and \((35,000 + \alpha\%)\), where \(\alpha = \text{the } de \text{ minimus} \) harvest rate. At predicted abundances of \((35,000 + \alpha\%)\) or less, the new amendment would apply.

PCFFA supports keeping 35,000 as a conservation objective in that, if that number were not met in fact for three years running, an overfishing review would be triggered.

Finally, PCFFA does not want to create a situation in which fishing pressure triggers more fishing in the form of *de minimus* fisheries, or causes continued stock depression. We therefore concur with the KFMC recommendation concerning technical review of an escapement shortfall prior to proposing *de minimus* fisheries for a second season.

**Conclusion.** PCFFA believes a framework plan amendment is essential to assuring some level of ocean and Klamath in-river fishing in the next few years as efforts are made to correct serious and long-term problems related to flow, water quality and disease in the Basin impairing spawning and juvenile fish survival. At stake are both the survival of the fish and the fisheries.
PCFFA fully recognizes crafting of such an amendment will have to be done with great care and for that reason we have limited our request for such an amendment to development of a harvest rate to allow for *de minimus* fisheries while we work for long term measures for assuring healthy and abundant stocks of Klamath River Basin salmon. PCFFA is actively working to develop solutions with agencies and other stakeholders in the Basin, related to the flow, fish passage and disease issues, and is fully engaged as well in the Federal Energy Regulatory Commission (FERC) proceedings and initiatives outside of those proceedings related to dam operations on the river and their affect on water quality and fish passage.

For the reasons outlined above, PCFFA respectfully requests PFMC action at the November meeting to immediately initiate a Salmon FMP amendment. If you, other council members, staff or the fishery agencies have any questions regarding this request, please contact our offices or Mr. David Bitts, Ms. Barbara Emley or Mr. Duncan MacLean. Thank you.

Sincerely,

Chuck Wise
President