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Agenda Item C.4.1
Supplemental Public
Comment 2
March 2006



KLAMATH CHINOOK SOUTH OF THE KMZ

GOOD JUDGMENT, COMMON SENSE, AND THE TICEHURST PLAN

Presentation to the Pacific Fisheries Management Council

March 7, 2006

Marc M. Gorelnik (gorelnik@gmail.com)



KLAMATH CHINOOK NEED HABITAT MANAGEMENT

- IN-STREAM CONDITIONS ARE SOLELY RESPONSIBLE FOR THE DECLINE
- REBUILDING POPULATION THROUGH BROAD OCEAN HARVEST BAN IS SCIENTIFICALLY FUTILE
- HARVEST SOUTH OF THE KMZ IS NEGLIGIBLE, MAKING NEW RESTRICTIONS UNNECESSARY



SOUTH OF THE KMZ OCEAN HARVEST = 2.1%

- TROLL AND SPORT OCEAN HARVEST (2005)
 - **5,249** (AGES 3 AND 4) *Preseason Report I, 2006*
- OCEAN ABUNDANCE (2005 POSTSEASON)
 - **244,284** (AGES 3 AND 4) *Id.*
- $5,249 / 244,284 = 2.1\%$

SOUTH OF THE KMZ 2006 OCEAN HARVEST < 2.1%

	2005	2006
Klamath Fall Chinook	251.7K	110.0k
Central Valley Chinook	843.3K	632.5K
Ratio (C.V./Klamath)	3.35	5.75
Percentage Harvested	2.1%	$(3.35/5.75) \times 2.1 = 1.2\%$ (est)

All source data from Preseason Report I, 2006

FEW NATURAL SPAWNERS AT RISK IN 2006 UNDER 2005 PLAN

Assumption	Harvest Rate of Natural Spawners	Ocean Harvest of Natural Spawners
Harvest (%) Unchanged From 2005	2.1%	627
Harvest (%) Reduced in Proportion to Lower 2006 Ratio of Klamath Chinook	1.2%	350
Scale Only for Decrease in Klamath Ocean Population (44% of 2005 Levels)	---	274 (<1%)

All source data from Preseason Report I, 2006



C.V. CHINOOK FISHERY WORTH >\$230 MILLION

- COMMERCIAL HARVEST CREATES \$100 MILLION IN ECONOMIC ACTIVITY
 - \$34.78 PER FISH BASED ON 2005 LANDINGS
- RECREATIONAL ANGLERS GENERATE \$130 MILLION IN ECONOMIC ACTIVITY
 - \$124.88 PER FISH BASED ON 2005 LANDINGS

Commercial value from March 3, 2006 San Francisco Chronicle.

Recreational value based on 2006 commercial value and commercial/recreational ratio from March 13, 1996 San Francisco Chronicle.



MORE RESTRICTIONS MEAN ENORMOUS ECONOMIC LOSS

Number of Klamath Fall Chinook	Harvest Ratio C.V. (259,325) to Klamath Salmon	Economic Cost Per Klamath Spawner
627	414	\$51,700
350	741	\$92,536
274	946	\$118,136



DO NOT SACRIFICE THE 2006 CENTRAL VALLEY CHINOOK SEASON

- ECONOMIC VALUE IS ENORMOUS
- SOUTH OF KMZ BY-CATCH OF KLAMATH NATURAL AREA SPAWNERS IS NOT MATERIAL TO THE HEALTH OF THAT FISHERY
- ADOPT THE TICEHURST PLAN AND CONTINUE THE 2005 RESTRICTIONS



THE TICEHURST PLAN MINIMIZES OVERALL DAMAGE

- PROVIDES FOR TEMPORARY SUSPENSION OF THE 35,000 NATURAL SPAWNER FLOOR, ABSENT WHICH THE OCEAN HARVEST OF CENTRAL VALLEY CHINOOK SALMON MAY BE NON-EXISTENT
- ALLOWS COMMERCIAL AND RECREATIONAL INDUSTRIES TO CONTINUE IN 2006 UNDER THE 2005 RESTRICTIONS, WHICH WILL RESULT IN THE TAKE OF AS FEW AS 274 NATURAL SPAWNERS *SOUTH OF KMZ*
- REQUIRES FURTHER STUDY IN LIGHT OF LATEST SCIENTIFIC INFORMATION AND CONTINUED DETERIORATION OF RIVER CONDITIONS



DON'T LET THIS HAPPEN



-----Original Message-----

From: Mullins, Dennis [mailto:LMID.DMULLINS@EDD.CA.GOV]
Sent: Monday, March 06, 2006 12:18 PM
To: Donelson, Debra S.
Subject: fisheries related job data question

Per your request, I aggregated the following Mendocino County industry data for the period of 3rd quarter 2004 through 3rd quarter of 2005 (the latest time period that data are available):

	EMPLOYERS	EMPLOYEES
ACCOMMODATION & FOOD SERVICES	304	3,774
SEAFOOD PRODUCT PREP & PACKAGING	4	219
COMMERCIAL FISHING	22	46
SCENIC SIGHTSEEING & TRANSPORTATION/ FISHING GUIDES	4	9

Please note these data represent total employment of the industries that you specified in your request. We are unable to provide detailed industry data that would assess the number of jobs that would be lost as a result of the fishing season curtailment in question. There is no reliable method to do so with any certainty. Just short of conducting a costly and time-consuming comprehensive industry survey by employer based on their past business activities and employment levels during a normal season, the information is just not available. Considering that a closure has the potential to negatively impact the entire industry or a particular employer within the industry and other related industries for the area, our approach is to provide total business and employment levels. There are too many variables involved, some employers within the industries that you specified might be more adversely affected than others based on their size, geographic location in the county and business type--some businesses cater to tourists involved in fishing more than others. Moreover, while their may be job lost associated with the shortening of the fishing season, those losses could be mitigated by other events such as marketing Mendocino County tourism with respect to other tourist amenities. Jim Martin may use the data to make assumptions that he feels are reasonable. Thank you,

Dennis Mullins, EDD Labor Market Information Division 409 K Street, Eureka, CA
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*Ready
for review*

**PACIFIC COAST FEDERATION
OF FISHERMEN'S ASSOCIATIONS**

Chuck Wise
President
Suzal Pitts
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Glen H. Spitz
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**Testimony Presented by the
PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS
To the
PACIFIC FISHERY MANAGEMENT COUNCIL
Regarding the
2006 Salmon Season Options and Action to Protect
Klamath River Fall-Chinook Salmon
Seattle, Washington – 7 March 2006**

Chairman Hansen and Council Members, thank you for this opportunity to provide some brief comments.

The Pacific Coast Federation of Fishermen's Associations (PCFFA), representing working fishing men and women in the West Coast commercial fishing fleet, calls upon the Pacific Council to take two actions at its Seattle meeting necessary for the preservation of the coastal salmon fisheries and the survival of Klamath River-origin salmon stocks.

First, we ask the Pacific Council to take emergency action allowing for fishing, as envisioned in last fall's motion for an amendment to the FMP, and to model and adopt for public review options that will provide viable ocean salmon season structures for commercial and recreational fisheries, while providing for the tribal and in-river recreational fisheries of the Klamath.

Second, we ask the Pacific Council to act at this meeting, calling upon the Secretaries of Interior and Commerce and the State of California to immediately put in a place an intervention program in the Klamath River designed to: a) provide the fish safe passage around those areas in the river where the infestation of the parasites is the greatest to prevent a parasite build up on the fish; b) ensure maximum spawning and juvenile survival success, including artificial propagation

STEWARDS OF THE FISHERIES

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as may be necessary; and c) increase flows from whatever water sources may be available during critical fish migration periods.

On the first action requested, we recognize that the predictions are, with fishing, we will not meet the 35,000 natural spawner floor of fall-run chinook set for the Klamath River. But then if there's no fishing that floor will not be met either. The loss of the fishery or a substantial curtailment, in excess of the major cutbacks made last year, will likely destroy the salmon fishery permanently. These are some of the impacts we'd expect:

One, fishermen will be forced out of fishing – faced with the prospect of losing their boats and unemployment - or into fisheries already at capacity such as open access sablefish (blackcod), albacore and Dungeness crab. For many fishermen, salmon accounts for up to 75 percent of their income on average, for others it's even more. The loss of a viable fishery or a complete closure will be devastating to fishing families. Charter fishing boat operations will be affected too, like commercial fishermen.

Two, secondary businesses, such as fish processing, fuel and ice suppliers, gear stores, bait and tackle shops and all those businesses in communities dependent on commercial or recreational fishing or both, will be severely impacted. Many will simply shut their doors and go out of business. Once they're out of business, it will be very hard to reestablish them along the coast given the premium for property in the coastal zone. In California, for example, commercial and recreational fishing facilities are protected in the coastal zone, but once their gone, the protection lapses for that use.

Finally, the losses will amount to hundreds of millions to our coastal communities. This may not be much in terms of Iraq or Katrina, but it's a lot of money for our coastal communities and one more negative to our states' and national economy. It is estimated our loss last year to the California economy just from the cutbacks in our commercial salmon fishery ranged from \$40 to \$60 million. Imagine what even more restrictions would do, coupled with losses in the recreational fishery. Moreover, as pointed out above, these losses could become permanent.

Now, you've heard a lot of this before. In fact, regional fishery councils across the country have listened *ad nauseum* about the economic impacts caused by curtailing fisheries. But there's a difference here:

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- The downturn in Klamath stocks was not caused by fishing, but a parasitic infestation in the river; and
- That infestation apparently continues, as do the conditions that made it possible for the fish to be affected with mass parasite infections – meaning conditions in the river remain lethal for spawning salmon, or most likely, their offspring.

What we're calling for are some options that will allow viable fisheries, while doing everything reasonable to avoid Klamath fish in the ocean, but which nevertheless would go below the "floor" set for natural spawners. But before anyone gets hysterical about this fact, let's put this all in perspective because cool and informed heads are going to be needed.

One, the Klamath natural fall-run "floor" is a goal intended to maximize natural production from the Klamath River in its current condition, or at least as it was prior to 2002. It is not a fish survival goal. Indeed, some of the best production of fish from the Klamath Basin was produced by spawning escapements, in 1991 and 1992, for example, which were well below the floor. So, while we do not dispute the validity of the "floor" under normal conditions, those who established it did not envision a parasitic infestation that would infect 80 percent of the fish and is nearly always fatal at these levels of infestation. What we're asking is not to lower or destroy the floor, but provide a trap door because of the conditions that now exist in the river.

Two, Klamath fall-run chinook are not an ESA-listed stock. Klamath coho are listed, but there is no fishery on them, nor has there been for about a decade. Both species, however, are affected by the parasite, which in turn becomes most deadly when flows in the Klamath are low.

While there is much hand-wringing about the immediate failure to meet the "floor," we have seen no such immediacy reflected in NMFS' Biological Opinion for water operations in the Klamath Basin that do not call for flows sufficient for fish survival until 2010! What gives? We're being asked to maximize returns to the Klamath, perhaps with no season, to a river that may not be suitable for fish life until 2010 because NMFS cut a skinny deal with the Bureau of Reclamation that gets the water agency off the hook for the next four years from ensuring there's water for the fish.

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Finally, it really doesn't matter what the natural spawning escapement is to the Klamath – 100,000 fish or 1,000 fish, if they're all going to die in the river – dying before they spawn or their young dying before they reach the ocean. Worse, is that severe and permanent harm will befall those being asked to sacrifice their fishing to futilely put fish in a river that then kills them.

That brings us to our second request for action by the Pacific Council. We recognize fully the Council's limited jurisdiction. You've been charged with conserving and managing fisheries, but the only tool you've been given is regulating fishing. It should be obvious to everyone here, that even closing down fishing will not save Klamath fish stocks, much as we found with coho – that unless protections were afforded in-river, no amount of restrictions on the ocean would save the fish. On the Klamath we don't have a lot of time to act and it's very late now. Actions in-river should have been taking place in 2002, certainly in 2004 when more was known, and now its 2006.

You don't have authority over the river, but on this council is a representative from the National Marine Fisheries Service, a representative from the Department of Interior, a representative from the California Department of Fish & Game – agencies that all have some authority in the river. The Council also has a bully pulpit to use to cajole the responsible parties to fix the river, so when we put fish back in it, they'll survive.

This winter's rains in the Klamath Basin may give us some relief, but we don't know that for certain and to that end we're asking for intervention in that basin, not simply standing on shore counting returns or doing some occasional trapping of juveniles for purposes of run estimates. Or hand wringing.

In those areas of the river where the greatest infestations of the parasite are known, a program for the trapping and trucking of wild juveniles is needed immediately to get them around infested portions of the river to avoid their becoming infected and dying. We've trucked fish around the pumps in the Sacramento-San Joaquin Delta for years to avoid curtailing diversions. We've trapped and trucked fish in the Columbia for years to avoid addressing fish passage problems at the dams. Surely we can do the same now on a temporary basis in the Klamath to save the fish until permanent fixes are made in the river (i.e., additional flows, removal of the four lower river dams that are exacerbating water quality in the basin). The traps are there, the trucks are there. All that's missing, it seems, is the will on the part of the agencies to save the fish.

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We also propose the hatcheries in the basin be used, as may be necessary - similar to the way we've commandeered production hatcheries for captive broodstock programs - to gain the maximum survival of juveniles when there were few adult spawners, consistent with sound genetic protocols. And we suggest all deliberate effort be made to find additional water in the basin to provide for flow as may be needed.

We recognize all of this costs money and it's not a perfect solution. For example, there may be straying of fish trucked or raised in hatcheries. But the alternative is death for these fish and that's not acceptable. We owe it to these fish and the fishery to maximize their survival in any way possible until the long-term fixes for the river come on line - we hope within the next decade.

We understand the Council is "under orders" to not allow fishing if it means the Klamath floor is not met. In a sense, the Council is like a company in an army that has been ordered to march down a road. Now other company's have failed, malingering along side of the road and this has brought on the wrath of the public that has put heat on headquarters. But while marching down that road you come to a cliff where a bridge has collapsed, you do not march the troops over the cliff, even if headquarters doesn't recognize it being out. Rather you make efforts to fix the bridge before marching on, and you let headquarters know that if you're to march on they're going to have to provide the materials to fix the bridge.

At first its ropes and timbers to temporarily put in place a structure to allow at least some to cross and then plans are made to put in the permanent structure with steel and concrete. Now the choice is yours. You can march your company off the cliff to certain death. You'll have followed orders. Or you call a halt and begin preparing to put a bridge in place so you can progress - calling on those who can procure the materials and have the expertise for bridge building and explain to the public the need for the bridge before the march can continue.

This is not easy for Platoon Sergeants and First Lieutenants to counter orders from Generals, and it requires courage and leadership. It may be easier to march the company over the cliff. But history in this past century has treated harshly, as it should, those who were merely following orders.

We're asking now for your leadership to fix the problem in the Klamath River so that when we allow fish to escape our fishery they'll survive and propagate and create many more so that we may successfully complete our march to an abundant and sustainable fishery. Thank you.

Agenda Item C.4.h
Supplemental
Public Comment 3
March 2006

TABLE IV-16. Estimates of California coastal community and state personal income impacts in thousands of real (2005) dollars of the troll and recreational ocean salmon fishery for major port areas.^a

Year or Avg.	Crescent City	Eureka	Fort Bragg	San Francisco	Monterey	Coastal Community Total ^b	State Total
OCEAN TROLL ^c							
1976-1980	5,931	15,065	14,772	19,379	8,317	63,465	81,591
1981-1985	3,005	3,625	8,484	16,015	5,457	36,586	45,551
1986-1990	1,132	2,801	14,902	28,938	10,821	58,593	71,909
1991-1995	9	133	937	10,897	6,208	18,184	21,913
1996-2000	10	158	663	11,420	6,924	19,175	20,288
2001	13	269	889	9,347	1,977	12,496	12,970
2002	235	450	3,204	13,327	3,589	20,805	22,101
2003	190	33	13,017	13,563	2,139	28,941	32,188
2004	1,671	368	6,391	20,077	4,519	33,025	33,720
2005 ^d	84	339	2,627	11,468	7,615	22,332	23,290
RECREATIONAL							
1976-1980	1,153	1,337	779	11,701	784	15,753	17,670
1981-1985	1,263	1,302	624	10,362	827	14,378	16,184
1986-1990	2,140	2,230	1,088	12,864	3,403	21,524	25,084
1991-1995	776	836	1,262	10,712	5,130	18,715	21,974
1996-2000	360	662	1,289	10,738	4,717	17,766	20,669
2001	454	934	2,284	8,289	2,997	14,958	17,555
2002	203	1,036	2,401	10,384	4,789	18,813	22,137
2003	115	785	1,807	7,577	2,231	12,515	14,511
2004	170	1,310	2,340	12,221	4,348	20,389	23,684
2005 ^d	131	828	1,835	9,284	3,281	15,359	17,877

a/ Per pound and per day estimates of income impacts provided from output of the Fishery Economic Assessment Model (FEAM). These are the income impacts associated with expenditures in the troll or recreational sectors. There is no differentiation between money new to the area and money which would otherwise have been expended in other sectors. It is assumed that all fish landed at a port is processed in the port area. Values through 1995 are based on a 1992 run of the FEAM using 1989 U.S. Forest Service MPLAN data. Beginning in 1996 values are based on a 1996 run of the FEAM using 1996 U.S. Forest Service MPLAN data.

b/ Income impacts on the coastal economy. Totals do not include impacts of one coastal community on another.

c/ Excluding pink salmon.

d/ Preliminary.

divided by 24,000 trips = \$76.50/spot trip

~~This does not include lodging, food, etc.~~
This is for party boats and stiffs combined