

# Ad Hoc Committee

P.O. Box 484  
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## Keep the Salmon fishing season open Review the Statistics -- curtailment of commercial fishing not justified 35,000 returns to sustain Klamath run not substantiated

*One would think* that keeping up the numbers of salmon in the rivers would insure a healthy restoration of the fishery. *It would seem* that curtailing commercial fishing and protecting salmon from predation would bring salmon numbers back up to historical highs. It was thought that 35,000 is the critical number of adult salmon needed to return to the Klamath to sustain it.

But things aren't always as they seem, and what is "intuitive" is not always correct. A fresh review of the old statistics shows that:

The best "returns" of Klamath Chinook come three years after the *lowest* returns -- *below* 35,000 -- some as low as 12,000! Conversely, the highest runs, well over the targeted 35,000 result in a *collapse* in the numbers of returning adults three years later. How can that be?

(Salmon return to our rivers to lay eggs when they are about three years old. The eggs hatch and the young go out to the ocean and that next generation returns *three years later*).

Typically, the skimpiest numbers of returning "natural" salmon in the Klamath, (averaging only about 18,000 in number) produce, three years later, *the highest runs* (averaging over 100,000 returns)! Between 1978 and 2005, the years when the "natural" spawners dropped *below* 35,000 in the Klamath, the numbers of salmon returning three years later showed the most dramatic *increases*! Look at this:

Klamath River "Natural" Spawners				
year	number of spawners		three years later	number of spawners
1983	30,000	yielded	1986	115,000
1984	12,000	"	1987	100,000
1985	15,000	"	1988	80,000
1992	12,000	"	1995	160,000
1993	20,000	"	1996	80,000
1999	20,000	"	2002	70,000

What happened when the number of "natural" adult reproducing salmon (spawners) returning to the Klamath was *higher* than the targeted minimum of 35,000 as requested by NMFS?

By contrast, when returns were above 35,000, the number of Klamath spawners returning three years later plummeted dramatically:

Klamath River "Natural" spawners				
year	number of spawners		three years later	number of spawners
1978	60,000	yielded	1981	35,000
1986	110,000	"	1989	40,000
1987	100,000	"	1990	12,000
1988	75,000	"	1991	12,000
1995	160,000	"	1998	40,000
1996	80,000	"	1999	20,000

Between 1978 and 2005 (27 years) there were only *three* occasions when more than 35,000 natural spawners returned to the Klamath to produce a higher number of spawners three years later!

Results -- What the statistics show:

1. That 35,000 returning "natural" spawners is *not necessary* to sustain the salmon run. Dramatic increases have been produced *typically* by "natural" spawning runs averaging only about 18,000;
2. That returns *above* the "floor" of 35,000, rather than sustaining a healthy return of their offspring, typically produce instead a *dramatic crash* in returns three years later.
3. That 35,000 may be too high a number of "natural" spawners -- the number of their young are above the carrying capacity of the Klamath River implying that there is not enough quality food or water in the Klamath to sustain them so that they either die off in the river and never make it out to sea, or cannot survive in, or make the transition to the ocean; 35,000 may be *overstocking*.
4. No justification for relying on 35,000 as a "floor" number for "natural" spawning returns on the Klamath; it certainly does not appear to be "optimum";
5. That the number of spawners is *not* the limiting factor to increasing salmon runs because even when above 35,000, the number of spawners returning three years later rarely continues to rise;
6. That the river is following a "boom and bust" pattern often associated with fluctuating food supply -- and associated factors like water, oxygen, pollutants, diseases impacting not only juvenile salmon but especially what they eat (caddis flies in the river, krill in the ocean);

We conclude that the PFMC, before taking Draconian steps to curtail the already ailing commercial fishing industry, needs to re-evaluate more than 25 years of data and revisit the policy regarding the "floor" of 35,000 "natural" spawners for the Klamath and focus instead on dramatic measures to increase the ability of the Klamath to sustain a larger population of young salmon.

H-2

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PFMC

re: Amendment 15 Salmon regulations "de minimis" fishery

The salmon industry is already a *de minimis* fishery. The number of salmon boats in the fleet are but a fraction of what they once were. Fifteen years ago there were four times the number of boats and the sason was May to September. Now there are only one fourth the boats and the season is severely curtailed due to the assumption that fewer than 35,000 natural chinook spawners should trigger a crisis.

We continue to challenge your assumptions, and find no proof in your data to justify the 35,000 "floor".

We suggest:

1. That the justification for the 35,000 floor be re-examined;
2. That the statistical modeling is not adequate to determine the actual carrying capacity of the Klamath and the appropriate number of spawners;

If after re-examination, you still do not recognize that 35,000 is inappropriate, then we propose:

IF:

You fear that groundfish trawlers have depressed the number of 2-year olds, and no action is taken to stop it;  
and you continue to use that depressed number as an indicator of the next years' spawners;  
and you believe that fewer than 35,000 natural spawners will return to the Klamath;  
and you still believe that 35,000 is necessary for a productive fishery;  
and there is still no aggressive action to curtail the diversions for wasted irrigation waters, and lawn-watering in the Klamath basin;

THEN:

1. Mark ALL hatchery fish;
2. Allow two salmon per man with a commercial fishing license (on a par with recreational allowances).
3. In addition, allow landing of hatchery fish from May to September.

Ann Maurice  
9/15/06

# Ad Hoc Committee

P.O. Box 484  
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5/15/06

## Where's Jack?

The PFMC predicted that there will be an extremely low return of "natural" Chinook spawners to the Klamath river this year; and that dire prediction is the rationale for severely curtailing the salmon season. That forecast is based on the *low number of "jacks"* or immature *2-year olds* that returned to the Klamath in the fall of 2005. **Why was that "jack" count so low?** What happened to the offspring of the 2003 spawners that *so few 2-year olds* returned? Was the count accurate? ***If so, where's Jack?***

There were lots of "natural" spawners in 2003 -- plenty of eggs and plenty of juveniles. How many spawners? **90,000** "natural" spawners in 2003! That's about *2 1/2 times* PFMC's "floor" number of 35,000. **So there should have been no problem!** There were lots of spawners, lots of eggs, lots of offspring. So what happened to the offspring of 90,000 Klamath spawners?

### ***Where's Jack?***

**Did the salmon fishermen catch them? No.** "Jacks" are juveniles **too small** for commercial catch or sale -- they are **not** marketable.

What does this all mean?

\*90,000 spawners in 2003, and a low jack count in 2005 means that a high number of spawners is no guarantee of sustainable yield; focusing on obtaining a high number of spawners in the Klamath is no guarantee of sustainability, is poor science and defies common sense;

**\*since commercial salmon fishermen do not catch one and two year olds, salmon fishing is not the problem and curtailing the salmon season is not a policy based on science.**

**Where were the jacks lost?** In fresh water or in the ocean? If in fresh water that means that the young of 90,000 natural spawners cannot survive in current Klamath conditions, so what good are more spawners and more eggs? In fact, too many young will make matters worse by competing with each other over limited food supply, like too many seeds on a field or too many cows on a pasture. If they were lost in the ocean, who caught them? **The PFMC's own report shows that most of the chinook "bycatch" caught by groundfish trawlers are 2-year olds!** So we have:

- \*Salmon fishing is regulated by the number of returning 2-year old chinook.
- \*Groundfish trawlers are catching 2-year old chinook, inadequately monitored and inadequately counted;
- \*The salmon industry, instead of the groundfish industry, is shut down when the 2-year old count doesn't meet PFMC requirements;
- \*PFMC requirements for jack counts and spawner counts for the Klamath are artificially high and above the carrying capacity of the river.

We need a fresh, open-minded review of this dysfunction and regulatory correction.  
Ann Maurice

Dean Estep  
Fort Bragg, Ca

H-2

to the PFMC:

Dear sirs:

Some comments on the state of affairs of the salmon industry and your proposed new regulations:

In 1988, 4 million pounds of salmon were landed in Fort Bragg. Now there are 75% fewer commercial salmon boats, but you have allowed those few of us remaining to land only 4000 salmon and fish only the month of September.

Your shortening the season is based on a floor number of 35,000 spawners. But 35,000 is unrealistic under the present conditions. We should be allowed to fish May 1 - September 1 unless the PFMC can prove that commercial salmon fishing is causing harm.

Salmon are not vegetarians. They need food, water, oxygen and low temperatures, not pesticides.

How can you destroy an industry because you are unwilling or do not know how to solve the problem after almost 2 decades.

Low returns to the Klamath produced the largest runs. Even in drought years, the low returns produced the largest harvests.

In July, I drove through the Klamath watershed. On July 18, 2006, I saw a Cal Trans diesel pump water out of the Trinity River for water trucks spraying water for dust supression in Highway construction. All along the river were PVC pipes sending water from the Trinity for private gardens.

How many councilmembers have actually been to the Klamath to see the conditions and learn the real causes for salmon spawning problems?

Dean Estep  
Fort Bragg