North Coast Consumer’s Alliance  
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To: Pacific Fisheries Management Council  
Portland, OR.  
Fax: (503) 820-2299  
From: Ellen Faulkner  
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Dear Members:  
The Iron Gate Hatchery on the Klamath River produces 6 to 8 million Chinook salmon smolts a year. The numbers that return to the hatchery are more than enough to produce the next 6-8 million.  

Not all hatchery fish in the river return to the hatchery to spawn. Some of them find suitable gravel downstream. They are then called "natural spawners" as opposed to "hatchery fish," but there is no real distinction between them; They or their parents may have all originated at the hatchery.  

The two-year-old jacks came back to Iron Gate in large numbers this year. If the numbers of jacks that bonk their heads on the hatchery gate is any indication of the numbers still left in the ocean, next year will have a bumper crop of three-year-old spawners.  

We can't call this hatchery run a "weak stock". The Chinook returning here are neither weak in number nor weak physically; To the contrary, they are many and amazing: feisty, strong, determined, even heroic fish. Nothing weak about them at all.  

The Iron Gate and other hatcheries have many more fish than they need to reproduce their runs. The excess fish are given to a processor who makes some of their flesh into cat food, fertilizer and other non-edible products. The fillets are returned to the local Food Banks, although I have never heard of anybody picking up salmon at the Food Bank.  

The excess salmon eggs, also known as roe or red caviar, is not returned. So where is the roe?  

These hatcheries were created to operate as mitigation to the fishing industry for dams like Iron Gate, that block upstream spawning habitat. These hundreds of thousands of excess fish should have been caught by the salmon fishermen. They should have
continued to support the towns, harbors and businesses that relied on them. But the mitigating fish that could easily have kept Ft Bragg, for instance, a thriving fishing town have been put out the back door of the hatcheries as "excess". The roe has been "disappeared".

PFMC regulations are responsible for this starvation in the midst of plenty.

As we have seen, the Iron Gate hatchery Chinook is not the "weakest stock" that the regulations were put into effect to protect. This "weakest" stock is somewhere in the Klamath Basin. Could be this stock is from the Shasta River, a Klamath tributary? The Shasta has a lethal zone near the confluence to the Klamath due to high temperature/low water. The State Water Resources Control Board is developing a TMDL plan for the Shasta and invites public comment on the process. Has the PFMC commented? Or has the PFMC just regulated the salmon fishing industry to economic extinction under the banner of protecting this "weakest stock"? Seems to me it would be much more sensible to help the Water Resources Control Board to develop and enforce the TMDLs. Its not as if the Water Resources people were asking for enough water to cut into the beef industry in the valley, or to take away necessary drinking water. All they say they need to fix the lethal zone is 10cfs more water than flow there now. A small conservation effort by the town of Yerka could cover that deficit. The valley can keep its picturesque and productive green pastures full of black cattle and also have a viable salmon run.

A word about by-catch: There may have been more salmon by-catch by the trawlers than was caught by the salmon fishermen. Observers are not enforcers. Even observing in the profit-driven atmosphere on a large trawler is an iffy job. The figure drawn from their observations must be understood as an underestimation.

Another big issue for the whole food chain in the ocean is the practice of dragging the ocean floor. It's too destructive to all the other fisheries to be allowed to continue. In the not-too-distant future we will be faced with a dead ocean if dragging is allowed to continue.

The current management of the salmon trollers has had drastic effects on consumers. We can't find locally caught salmon in the stores at any price. We need these fish in our diet as a source of Omega 3 fatty acids. We get plenty of arachidonic acid in our American diet of meat and dairy. Arachidonic acid has been implicated in several too-common inflammatory diseases like atherosclerosis and arthritis. (Winning the War Within, Floyd H. Chilton, Phd.) Dr Chilton recommends ocean-caught salmon as the best source of Omega 3s to balance off our high intake of arachidonic acid. Farmed salmon do not have much of this vital nutrient. Many other fish are not only lower in Omega 3s but carry too much mercury to be recommended. Some of the best food we can eat has been taken right off our plates by the PFMC regulations. Another source of information that recommends ocean caught salmon as necessary to our health is a pamphlet put out by Oxmoor House, "Guide to Life after 50, 60, 70 and Beyond." There is also a common flyer put out in the fish aisles at the natural food stores that warns of
high mercury levels in many species of fish. Again, salmon are noted for their low mercury levels.

The Office of Environmental Health Hazard Assessment of the Cal EPA has put out a draft health advisory for safe eating guidelines for fish from Lake Sonoma and Lake Mendocino. This advisory in another source that investigates mercury levels in fish. The only fish low in mercury in these mercury-laden lakes is the native steelhead trout, a relative of the salmon. Why these species of fish remain low in mercury in a high-mercury environment may have to do with their evolution over millennia right here in our local high-mercury environment. They may have learned how to kick the mercury right out of their systems. Whatever the reason, these fish are of inestimable value to the American consumer, and should not be kept off the market.

I have printed out some pages from your website at the local library where I can download PDF files. The printing is cut off on the left hand side and I have to make guesses at some of the words. This isn't user-friendly. Please rectify.

Because of the drastic nature of your current management regimes, and its deliterious effects on the consumers, I am requesting a full EIS for the commercial salmon season closures and truncations. For this season you can do an interim opening. All the issues involved should be discussed at public scoping sessions. The public, which is so deeply impacted by your management practices, should have the information it needs to protect itself.

Ellen Faulkner