



YUROK TRIBE

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March 28, 2013

Mr. Dan Wolford, Chair
Pacific Fisheries Management Council
7700 N.E. Ambassador Place
Portland, OR 97220-1384

Re: Comments regarding ocean salmon fishing alternatives and the request for additional flow for Klamath Basin fall chinook migration

Dear Mr. Chairman:

I submit this letter on behalf of the Yurok Tribe. The Yurok reservation is located on the lower 40 miles of the Klamath River and the Yurok Tribe is the largest harvester of Klamath Basin fall chinook; an indicator stock managed by the Pacific Fisheries Management Council (PFMC).

I submit these comments regarding the alternatives for proposed ocean fishing seasons that are contained within *Preseason Report II Proposed Alternatives and Environmental Assessment Part 2 for 2013 Ocean Salmon Fishery Regulations*. The Yurok Tribe typically does not comment on how other fisheries are managed, unless there is a technical concern regarding the estimation of impacts on Klamath fish or if there is a conservation concern; our comments regarding 2013 ocean fishery season structure are limited to such issues. I also write to encourage the Pacific Fisheries Management Council (PFMC) to send a letter to the Secretary of Interior requesting additional flow be provided during the 2013 Klamath fall chinook migration to enable adequate migration conditions during a time of dry hydrologic conditions.

Short Season Closures

We share a concern expressed by the STT (Preseason Report II, page 3) regarding short weekly closures (two days per week closed) that are proposed in Alternative 1 for the recreational fishery from Pt. Arena to the Mexico Border from June 1 – July 9. Our concern with these short seasons extends to the similar structure being proposed in Alternative 3 for the Commercial fishery from Horse Mountain to the Mexico border; in particular the June 1–5 and June 14-18 proposed seasons (i.e. closed two days per week).

Our concern lies with the challenge to accurately estimate effort, and resultant harvest impacts of Klamath fall chinook, for these short seasons that are not represented in the historic database that drives the Klamath Ocean Harvest Model (KOHM).

As noted in the STT's concern, short closures on the order of 1-3 days per week, may have negligible effects on actual fishing effort, resulting in under predicted catch and exploitation rates. Therefore, if such seasons are considered, the Yurok Tribe recommends that the KOHM incorporate the assumption that effort for these fractured seasons would be similar to seven day per week fisheries.

Fall Fisheries

In regard to the fall fisheries, otherwise known as the "credit card" fisheries, we recommend using a conservative approach for structuring these seasons; some of the alternatives for the California KMZ depart from this concept. Impacts from these fall fisheries are not modeled pre-season, therefore it is unknown what the impact will be on the 2014 Klamath fall chinook abundance. Fishing upon a stock of unknown size could potentially jeopardize our ability to meet spawning escapement objectives in 2014, as well as result in dramatic constraints to fisheries in 2014. Therefore, we recommend a conservative approach when structuring fall seasons and urge the Council to prioritize development of methods to model Klamath fall chinook ocean harvest impacts for fall ocean fisheries.

Fall Flows

The fish kill of 2002, which included the death of tens of thousands of maturing adult salmon migrating to their spawning grounds, occurred within the boundaries of the Yurok Reservation. This event was devastating to Yurok People as well as to our fishery; it is imperative to us that management actions be taken to minimize the repeat of such an event.


We are currently experiencing dry hydrologic conditions, and looking forward to the second largest run of fall chinook to the Klamath Basin since records were first kept in 1978. While the relatively large run is a blessing, a large run combined with low flows is cause for concern, as these were the key ingredients that led to the disease outbreak which caused the 2002 fish kill.

Therefore, I urge the PFMC's approval of a letter to the Secretary of Interior requesting that the Bureau of Reclamation provide additional flow during the 2013 fall chinook salmon migration to help ensure the successful passage to the spawning grounds. I thank

the Council for sending a similar letter during 2012 and note that this additional flow resulted in noticeably improved conditions within the Lower Klamath River.

If you have any questions regarding these comments, please don't hesitate to contact myself or Dave Hillemeier (Fisheries Program Manager) at the address in the letterhead.

Sincerely,



Thomas O'Rourke, Chairman