



2/23/10

We are the Trinity River Guide Association (TRGA), representing the recreational sportfishing guides on the 110+ river miles of the Trinity River. We are composed of both fly fishing guides and conventional tackle guides, as well as those who fish both methods. The recreational sportfishing value of the Trinity River and its anadromous fishes spans almost a 10 month season – one of the longest recreational seasons of any West Coast river systems – and contributes approximately 4 million dollars annually to the rural economies of Trinity and Humboldt Counties.

The TRGA is concerned about the once-abundant anadromous fish resources of the Trinity/Klamath basin. It has been our first-hand observation – based on approximately 10,000 client days each year – that the spawning escapement for the Trinity River is in jeopardy, especially with regards to both Spring and Fall Chinook and Coho Salmon.

We would like to see spawning escapement goals increased and regularly attained for the benefit of the river ecosystem as a whole. The Trinity River needs its salmon and steelhead in order to remain a healthy ecosystem, and we believe it needs increased numbers of mature fish reaching their spawning potential each season in order to improve the fishery. Total harvest numbers need to be limited and/or reduced – by all river users, including commercial fishers, native tribal fisheries, and recreational sportfishers – to protect the declining fish populations, specifically with regards to federally listed Southern Oregon Northern California Coho (SONCC) Salmon and both Spring and Fall Chinook Salmon.

A common trend has been prevalent in past years that puts spawning escapement in jeopardy. In many years, the actual returns of fish to the Trinity system are far below the predicted size of the runs. This is an apparent indicator that run-size estimates are consistently over-estimated, ultimately leading to unsustainable harvest allocations of the few returning fish. Rather, let us err on the side of caution, and aim towards more conservative estimates and harvest goals.

The goal for the Trinity/Klamath basin should be a sustainable anadromous fishery. The TRGA argues that it would be better to actually reach or exceed escapement, as opposed to the oft-repeated cycle of not enough fish at the end of the season due to allotment quotas that are based on error-prone pre-season run size predictions. More fish in the river would benefit every interest in the Trinity/ Klamath basin: in-river sportfishers, tribal fisheries, and ocean commercial and sportfishers. The bottom line is that we need more fish, and if we continue to overharvest the results will be less fish each season, instead of more, and a continual downward spiral that could ultimately lead to a collapse of the entire anadromous fish population on the Trinity River. Something has to change. We are willing to do our share by agreeing to a reduced in-river sport fishery harvest

quota, with the caveat that the portion of the in-river sport quota given up be transferred to in-river escapement and is not simply allocated to any other interests.

The PFMC should err on the side of conservation and promote decreased harvest goals that will serve to protect the fishery as a whole, rather than guarantee the ecosystem collapse. The 2009 Chinook season is a prime example, as in-river fisheries failed to meet allocated harvest quotas, yet the Trinity River nonetheless only made its escapement goals by a mere 3,893 fish. In-river sport fishers, for example, harvested less than 19% of their allotment for 2009 (5,571 harvested fish vs 30,800 allocated). If recreational anglers had harvested even one-third of their allotment, escapement would not have been met for the 2009 season. Tribal fisheries reported a harvest of 28,389 fish, which was only 91% of their allotment for 2009. If tribal fisheries had harvested their full allotment, escapement would not have been met for the 2009 season. The total harvest for the Trinity/Klamath basin for 2009 was 33,960 adult salmon, versus 62,000 allowed, resulting in a mere 54.7% of the harvest taken. Therefore, if even 62% of the overall harvest allocations had been taken, escapement would not have been reached; in fact, we would likely have been over 23,000 fish short of escapement goals. This is unacceptable, and harvest allocations must be reduced for all groups to help ensure escapement goals are met each and every year.

Alternatives that we would like to see implemented are a mark select fishery and the mass marking of hatchery produced salmonids. A selective harvest of marked hatchery fish would protect the native salmonid runs that are currently in a downward trend. This will help specifically to protect the federally listed threatened Coho Salmon and Spring Chinook Salmon, which are currently on the brink of extinction and yet continue to be incidentally harvested.

The TRGA would like to work with all commercial, tribal, and recreational stakeholders within the Trinity/Klamath basin to help protect and enhance the fishery. Collectively, we all share a common goal: more fish in the Trinity River and an improved anadromous ecosystem. In order to reach this goal, we may all have to make some concessions to ensure that more fish make it upriver to spawn.

We recommend exploration of simple proposals that could help more fish return to upriver spawning locations, hopefully without making too big of an impact upon anyone's ability to enjoy fishing in the Trinity/Klamath basin, or – more importantly – feed their families. These would require some cooperation from the tribal communities on both the Klamath and lower Trinity, as well as all recreational and commercial anglers. Long-term, however, these simple adjustments to the status quo would benefit everyone through more salmon and steelhead reaching spawning each year, and therefore larger returning runs in subsequent years.

- Reduce all harvest allotments. The current system for estimating escapement goals and allocating harvest numbers is far too error-prone to promote a sustainable fishery. Harvest allocation goals need to be based on conservation, with the end goal more fish in the river reaching their natal spawning grounds.

- Implement a mark select fishery and the mass marking of hatchery produced salmonids. A selective harvest of marked hatchery fish would protect the native runs of Threatened Coho Salmon and Spring Chinook Salmon, which are currently on the brink of extinction and yet continue to be incidentally harvested.
- There should be better regulations and accountability. This would not only help protect the tribes from un-founded accusations that they may be taking too many fish, but it would also allow for better overall data regarding the health of the fish stock and run numbers. As professional guides operating on the Trinity River, we fill out log books for every day that we are on the river, which is an exact reporting method for the numbers and types of fish caught, kept, and released. The more precise the data, the more accurately the fishery can be managed to protect the resource.

In closing, the Trinity River Guide Association is concerned about the salmon and steelhead fishery of the Trinity River. Escapement goals are not being met, and we must do something now to protect the river resource and its native anadromous fish in order to prevent further species extinction, negative impacts to the river ecosystem, and the potential for the collapse of another anadromous fishery. We're willing to work with the various local, state, regional, and federal agencies, as well as the various river user groups, to ensure the long-term success of the Trinity River fishery.

Respectfully Submitted:

Trinity River Guide Association

Michael Caranci, President  
[michael@theflyshop.com](mailto:michael@theflyshop.com)

Liam Goggan, Vice President  
[Krista@trinityriveroutfitters.com](mailto:Krista@trinityriveroutfitters.com)

Bill Dickens, Treasurer  
[webefshn@compair.net](mailto:webefshn@compair.net)

E.B. Dugan, Secretary  
[Yen2fish@yahoo.com](mailto:Yen2fish@yahoo.com)

Board of Directors:

Scott Stratton  
Bob Norman  
Paul Catanese  
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