

National Audubon Society



Ten Mile Creek Sanctuary

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To: Pacific Fisheries Management Council
2130 SW Fifth Ave., Suite 224
Portland, OR 97201

From: Paul Engelmeyer
NW Policy Analyst
Living Oceans Program
National Audubon Society

March 25, 2001

Dear Mr. McIsaac

National Audubon Society welcomes this opportunity to comment on the proposed 2001 salmon fishing season. There are a number of issues and concerns that I would like to draw to your attention.

Coho Salmon

It is essential that the Council maximize spawner abundance on this Oregon Coastal Natural (OCN) coho 2001 brood year. The parental spawning escapement that produced the OCN coho salmon returning in 2001 was the third lowest observed since 1950. The estimated coho salmon natural spawning abundance (Stratified Random Survey accounting) indicates that in two of four coastal subunits (North and North-Central) the 1998 brood year had a less than 4/ fish per mile density in all basins from the Nehalem River to the Siuslaw River. It is not a question that these populations have triggered the '**Critical Threshold**' designation.

When considering the 2001 salmon fishing options I urge the Council to review the Scientific and Statistical Committee's (SSC) supplemental technical memo dated 11/2000 which states "...**The SSC stresses that when stocks are in the 'Critical' parental spawner category there is no biological justification for allowing harvest.**" This level of concern is not just limited to the SSC. In the 9/6/2000 letter from the Independent

Multidisciplinary Science Team (IMST) to ODFW the team recommended the following, "...Because spawner abundance have been extremely low and recruitment for all three recent brood years (1995, 1996, 1997) has been below replacement, fishery impacts should be as close to zero as possible until established signs of recovery are observed."

In Preseason Report 1, Stock Abundance Analysis for 2001 Ocean Salmon Fisheries the document Table A-1 acknowledges that state and federal agencies have yet to define Conservation Objectives for a number of stocks such as;

- Columbia River coho (naturals) listed under Oregon's Endangered Species Act (ESA)
- Southern Oregon/Northern CA Coastal /ESA listed 5/97
- Central CA Coast Coho / ESA listed 10/96
- Central Valley Spring-run chinook /ESA listed 9/99
- CA Coastal chinook /ESA listed 9/99

It is critical that the Council moves forward with the development of Conservation Objectives as well as defining exploitation rates for all stocks impacted by Council management, such as Klamath Spring Chinook and Sacramento Fall Chinook.

I urge the Salmon Technical Team and the SSC to consider including the Columbia River coho (naturals) as a subunit of the OCN coho management regime. There must be consistency with the state of Oregon's salmon recovery strategy for all naturally spawning coho. When there is discussion concerning rebuilding strategies and/or increasing exploitation rates all indicators of recovery must be acknowledged and included in the analysis. The IMST has recently completed the report entitled, '**Salmon Escapement and Harvest Management: Implications for Rebuilding Stocks of Wild Salmon in Oregon**' which clearly identifies the criteria to evaluate recovery - abundance, productivity, spatial and temporal structure, genetic diversity and ecological functions.

Selective Fisheries Considerations

National Audubon Society is very concerned about the regional fisheries management's ability to appropriately analyze and manage selective fisheries. The risks and potential consequences of multiple selective fisheries create difficulties in modeling nonlanded mortalities. The region

has moved into a new fisheries management regime with inadequate review and analysis. We urge the Council to develop a comprehensive review of nonretention fisheries management. This review should include independent peer review process in addition to the Council's SSC and STT advisory bodies.

In the 9/6/00 letter to ODFW the Independent Multidisciplinary Science Team concluded; **"Current estimates of mortality from non-retention fisheries are highly variable, subject to substantial uncertainty, and cannot be characterized as accurate. Experimental methods are limited and subject to many sources of error. Even low incidental mortality rates of OCN coho salmon could significantly slow recovery for depressed stocks. Scientific review of hook and release mortalities should be an on-going process, as environmental conditions change."**

Ocean Productivity and Environmental Conditions

Recent information concerning ocean productivity and environmental conditions indicate that the region is sliding into a two year El Nino driven drought cycle. Projections are that there will be no relief until 2003. This information has significant ramifications for salmon populations region wide. There is potential for negative impacts to returning adults, out-migrating smolts, as well as fry that must deal with low summer flows. Short-term fluctuations in ocean productivity and adverse environmental conditions dictate the need to ensure maximize spawner abundance in order to protect genetic integrity of the numerous ESA listed salmon populations. I urge the state and federal agencies to take a precautionary approach when projecting wild salmon abundance over the next few brood cycles.

Terminal-Fishery

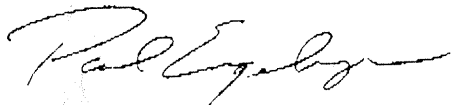
Upstream, Salmon and Society in the Pacific Northwest (1996, National Research Council) clearly indicates the need to transition to a new fishery management paradigm. One component of this new paradigm includes the terminal-fishery option. **"Catching salmon closer to the place where they spawn allows greater separation of hatchery from wild and threatened from nonthreatened populations. A way to achieve that separation is to allow terminal fisheries."** In light of the robust returns to some hatcheries and basins I urge state and federal agencies to move quickly this spring in developing a terminal catch strategy that fair and ecologically sound.

Recommendations:

National Audubon Society urges the Council to endorse the following recommendations,

- 1) Support Option III, the most conservative option for the 2001 salmon-fishing season, in order to maximize spawner abundance and protect genetic integrity of the numerous ESA listed salmon populations throughout the region.
- 2) Initiate an independent comprehensive review of the regional non-retention fisheries management regime.
- 3) Initiate technical analysis for including the Columbia River coho (naturals) into the OCN coho sub-unit management regime.
- 4) Develop a terminal fisheries management plan that maximizes the catch as well as protects the 'at risk' populations.
- 5) Utilize a precautionary approach when ESA listed salmon populations are being impacted or when knowledge base is limited.

Sincerely,



Paul Engelmeyer
Living Oceans Program
National Audubon Society



Marlyn Schafer, Chair Lucie La Bonté, Vice Chair Cheryl Thorp, Commissioner
(541) 247-7011 Ext. 222 P.O. Box 746, Gold Beach, OR. 97444 (541) 247-2718 (FAX)

Pacific Fishery Management Council
2130 SW Fifth Avenue Suite 224
Portland, OR 97201

Dear Sirs;

March 28, 2001

After reviewing the options for recreational and commercial opportunities for the 2001 salmon fishing season, the Curry County Board of Commissioners supports the Klamath Coalition's recommendations.

Option 1 is the preferred option for the 2001 recreational fishing season. This option will help maintain equity within the Klamath Management Zone. It is also a conservative approach that respects the impacts on Endangered Species Act listed fish in our region.

The Commission also supports the Option 1 for a commercial fishing season as the preferred option with some modification. We believe to help our small boat fishing fleet to survive the severe impacts from reductions in the ground fish fishery and a downtrend in the crab fishery, a June commercial fishery must be added to Option 1. Many of the small boat owners have families that depend on their livelihood. We need to be flexible to continue to maintain our small fishing fleet and to support this segment of our economy.

Sincerely,


Commissioner Marlyn Schafer, Chair


Commissioner Lucie La Bonté, Vice Chair


Commissioner Cheryl Thorp

Subject: Salmon Economic Analysis

Date: Wed, 28 Mar 2001 19:59:55 EST

From: <HERBHOLM@aol.com>

To: pfmc.comments@noaa.gov

P.F.M.C. in up to their dirty tricks again. Have public hearing on salmon options then tell nobody. We received your preseason report one day after the hearing and a day after allowable comments. I called the local daily Newspaper and they never received any public announcement from PFMC also none of the radio or TV station never received anything. I'm on your mailing list and have been for years. I also own two fishing boat.

Maybe the change in Washington administration will bring change to your dirty tricks. I sure will be documenting your past performance to them and asking for a change. There is no reason why the public can't comment. On important matter of this kind. You may think your God but your not.

Herb Holm 2821 Fairfield Street Eureka, California 95501-3524

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MAR 21 2001

PFMC

OREGON SALMON COMMISSION

March 20, 2001

PFMC
2130 SW Fifth Avenue, Suite 224
Portland, OR 97201

RE: Incidental Halibut Landings in the Salmon Troll Fishery

The Oregon Salmon Commission at its meeting on March 19, 2001 voted to support the incidental halibut option #1. This option states, "License holders may land no more than 1 halibut per each 3 chinook, except 1 halibut may be landed without meeting the ratio requirement, and no more than 35 halibut may be landed per trip."

Please accept this letter as testimony on behalf of the Oregon Salmon Commission in support of Option #1 in the Incidental Halibut Harvest.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in cursive script that reads "Nancy Fitzpatrick".

Nancy Fitzpatrick, Administrator
Oregon Salmon Commission

