

SUMMARY OF WRITTEN PUBLIC COMMENT

Of the eight letters received:

- Two commented primarily on the commercial troll fishery.
- Four commented primarily on the recreational fishery.
- Two commented on both recreational and commercial fishery options.

Commercial Troll Comments

One letter requested the Cape Falcon to Florence South Jetty fishery be structured four days open, three days closed for the month of May.

Klamath Management Zone (KMZ): One letter supported a modified option for the Oregon portion of the KMZ with a landing limit of 30 fish per trip in September.

Fort Bragg: One letter supported additional consideration of nearshore opportunity between Fort Ross and Point Reyes.

Recreational Comments

KMZ: One letter supported Option I, and one letter recommended a one fish bag limit as a way to reduce the July and August closure.

Cape Falcon to Oregon/California Border mark-selective coho fishery: One letter supported Option I, and one letter recommended the season open in August rather than June, when coho are smaller.

North of Cape Falcon: One letter recommended a bag limit of two salmon, only one of which may be a chinook, and only one of which may be an un-marked coho. The intent of the recommendation was to reduce hooking mortality on un-marked coho.

Other Comments

One letter suggested there was no harvestable surplus of Klamath fall Chinook, and all ocean fisheries impacting that stock be closed.

One letter recommended the Council and the National Marine Fisheries Service (NMFS) review the Klamath fall chinook spawning escapement floor conservation objective and consider replacing it with a harvest-rate based conservation objective.

One letter recommended against Option I for fisheries north of Cape Falcon or any option that did not meet NMFS Endangered Species Act consultation standards.

PFMC
04/1/05

----- Original Message -----

Subject:FW: Misc. comments for 2005 season

Date:Wed, 9 Mar 2005 18:27:12 -0800

From:Everett & Robyne Baldwin <robyne@seanet.com>

To:<Chuck.Tracy@noaa.gov>

Dear Mr. Tracy:

I was going to send a separate commentary pertaining to just the ocean fisheries, but the two are so intertwined, that I thought I would just go ahead and send along a copy of the North of Falcon comments I made to WDFW.

Thanks for your consideration of my remarks.

Sincerely,
Everett E. Baldwin
Ph. (360) 533-0178

From: Everett & Robyne Baldwin [mailto:robyne@seanet.com]

Sent: Wednesday, March 09, 2005 5:32 PM

To: 'NorthofFalcon@dfw.wa.gov'

Subject: Misc. comments for 2005 season

Dear Ladies & Gentlemen of the WDFW:

I have some commentary on the fisheries for Grays Harbor and tributaries that I would like to submit into the North of Falcon process.

1. Retention of Chinook in Grays Harbor. Unless the tribal fishers agree to use 45 minute soak times, attend nets at all times, and net with tangle nets at non-peak Chinook run times on Grays Harbor tributaries, I as a sport fisherman, and all of the others that I know, will not agree to the closure of G.H. to the taking of Chinook Salmon this fall. One Chinook per angler, just like last year. This is a major economic impact to the sport fishing community and until we see not only some enforcement, but diligent enforcement by tribal law enforcement, and adherence to the above rules and same take quotas as the sport fishers, then we feel the Chinook season should go forward, regardless of predicted run return size. This is a question of equity, and the resource allocation has gone totally insane, to keep sport fishers off the Chinook in G.H., only to have them hit tribal gill nets in the tributaries is a waste of time and money.

2. Earlier return date on punch cards. It's incredible that with the North of Falcon process ongoing, here we are in March, without a clue as to what last year's catch was. There isn't a sport salmon season worth spit in G.H. after January 1st, and punch cards should be required to be turned in by then, and if not, a new one will not be issued. This will enable everyone to have better real numbers to work with when the NFP starts in early spring.

3. In season openers. Pay more attention to fish sampling, and do more fish sampling. We docked at a private berth in the Westport Marina last year and were checked only about 1 trip in 10, if that. It's time to start managing the fish on better "guestimates" and then perhaps create some more sport

fishing opportunity as a result. Run sizes and predictions are only that, just predictions, and more information is needed on a timely basis to perhaps create those new opportunities.

4. Tribal seasons, if impacts are so critical this year, to be quota based, same as sport fishers, not season based. We don't need a 7 months out of the year, open season with gill nets on the fish, and the small predicted Chinook run this year makes this especially critical.

5. In the ocean: Sport fishing. Allow one Coho to be a wild fish, to reduce hook mortality issues. Bag limit then would be, 1 Chinook, and 1 wild or hatchery Coho, or 1 wild Coho and 1 hatchery Coho.

6.* This is an important one! Do not push back the G.H. opener to Oct. 1st as some idiots have suggested. That is a small boat fishery out there, and October has serious weather and therefore safety issues, along with conflicts with gill-netters. A Sept. 15th opener in the minimum and frankly, most of us would like to see it open Sept. 1st as it used to a few years ago. The later openers are just a tactic to squelch the G.H. sport fishery, and keep us off the fish, and we will not stand for that. Back to that equity issue again, and that is an issue rooted in the applicable law.

7. Work with Coast Guard to require proper safety equipment and identification lights on tribal boats. This includes the legally required identification numbers, to enable violators to be identified. Very few of them have all of the foregoing. Also, in observing tribal fishers for over 10 years in the Chehalis River system, I've not once seen a tribal enforcement boat out there checking those guys. Not once. Neither has anyone else I've talked to, including employees at the Weyerhaeuser Mill who observe that fishery frequently.

8. Tribal fishers when they get close to their quotas on the Chehalis have been observed starting their "egg industry" up, and gutting salmon, the carcasses of which they throw back to avoid filling their quota. However they continue to kill fish and take the eggs. This has to stop.

9. It seems that WDFW wants people to buy licenses and tags, so their jobs will be secure, but recreation sportsmen don't see WDFW working to promote equal & fair access to the resource. In other words, rather than using it's legal authority to deal with conservation issues with the tribes, it simply lets them take more, and then dribbles out whatever's left to the people who pay to support and run the system, and this isn't right, it's been going on too long.

10. In conclusion, I was at the 7:00p.m. meeting at Montesano High School for the coastal fisheries, and I would like to thank WDFW personnel for being there to take our comments and to host the meeting.

Thank you for your consideration of my remarks.

Sincerely,

Everett E. Baldwin
27 Meander Way
Aberdeen, WA 98520
Ph. (360) 533-0178

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Chuck Tracy



RECEIVED

March 17, 2005

MAR 21 2005

Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

PFMC

Subject: Harvest Planning for Salmon from the Shasta River Fish and near-by portions of the Klamath River.

Dear Council Members,

For the last several years researchers have been following extremely worrisome trends in juvenile salmon survival in the Klamath River at several locations below Iron Gate Dam. The best currently available information strongly suggests that the natural production of juvenile salmon in 2002, 2003 and 2004 from most of the area upstream of the confluence of the Klamath and Scott Rivers has been extremely poor to non-existent, due to a very high incidence of *Ceratomyxa shasta*, a lethal parasitic infection found in the Klamath River and to which juvenile salmon are extremely susceptible.

Because of this near-total age class failure spanning multiple years, we believe that every effort must be made to protect adult spawner numbers, and as a consequence we believe that there is no harvestable surplus of salmon available from the Shasta River, nor from much of the rest of the upstream portions of the Klamath, and that responsible harvest management and NEPA and CEQA assessment must reflect this very unfortunate reality.

Last year 2,490,000 healthy juvenile fall chinook salmon exited the Shasta and entered the Klamath River. At Kinsman Creek, 31 miles downstream, a screw trap operated by USFWS/USGS found that approximately 85% of the juvenile salmon passing that point (including those from the Shasta) were so badly infected with *c.shasta* that death was imminent, and with additional mortality likely as the disease progressed over time in more lightly infected fish. This 80+% mortality is in addition to other mortality resulting from predation, poor water quality, other disease, etc. occurring elsewhere in the mainstem of the Klamath River or the ocean. If this mortality level continues, which appears almost certain since no measures are at hand to reduce it and indications are that in the coming drought year will be even worse than prior years, the continuing loss of successive juvenile cohorts will result in disastrously low returning adult numbers in future years.

We believe we are at risk of losing salmon genetics and production from some of the most productive areas of the Klamath Basin forever.

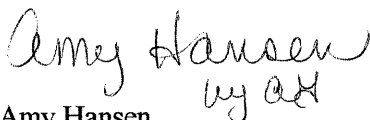
The Shasta Valley RCD recognizes the disaster implications for the coastal communities and commercial fishing industry due to low harvest numbers and has endorsed the attached letter requesting disaster relief in these communities.

March 17, 2005

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The Shasta Valley RCD recognizes that we can not know with certainty the consequence that will result on Klamath Basin salmon populations if any harvest is allowed on the already depleted adult numbers. We worry that ESA listings of Klamath fall chinook may be likely to occur in the near future if the above mortality cannot be reversed. Given the magnitude of the multiple-cohort juvenile risk, and the already-known minimal adult numbers potentially available for harvest, we cannot see any way to justify putting the future at greater risk than it already is.

Thank you,

Handwritten signature of Amy Hansen in cursive script.

Amy Hansen
Shasta Valley RCD
District Manager

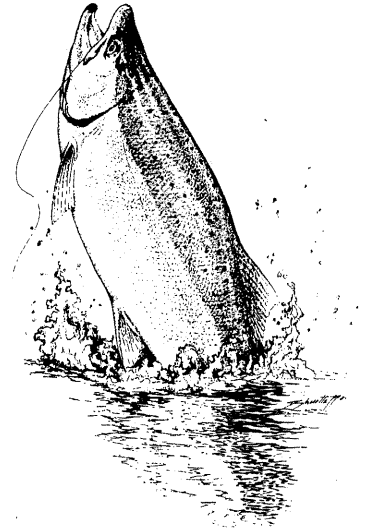
Oregon South Coast Fishermen

P. O. Box 2709 ■ Harbor, OR 97415

RECEIVED

MAR 21 2005

PFMC



March 16, 2005

Mr. Donald K. Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR. 97220-1384

Dear Mr. Hanson,


The Oregon South Coast Fishermen have reviewed the proposed options for the ocean recreational salmon season in the Klamath Management Zone and support Option 1; May 14 through July 4; and August 14 through September 11, for Chinook salmon, minimum size of 24 inches total length. In addition, we support the proposed selective Coho salmon season proposal of June 18 through July 4; adipose fin clipped Coho salmon, minimum size of 16 inches total length. We agree that Oregon should be "held harmless" by the irresponsible proposal of the California Fish and Game Commission to increase the in-river recreational allocation for the Klamath – Trinity Rivers. We hold that proposal to be irresponsible given the minimal increase to the in-river sportsmen at the expense of opportunity in the ocean to harvest abundant Sacramento River Chinook stocks, at the expense of California recreational and commercial fishermen.

Having endorsed those options, we note with great irony the impact of Klamath River natural spawning escapement goals on salmon fishing opportunities. In a year with an unprecedented abundance of central California Chinook salmon and relatively good abundance of other Chinook stocks, we are being substantially reduced in our opportunities to effectively manage salmon harvest because of Klamath River minimum escapement goals. While we are committed to helping restore the Klamath River system, we feel the Pacific Fisheries Management Council (P.F.M.C.), the National Marine Fisheries Service and the Klamath River tribes, should review the minimum natural spawning escapement goal. We would recommend thorough exploration of options that would replace the "floor" of 35,000 adults with a minimum escapement goal that is based on a proportion (i.e. 33%, 40%, 50% or whatever proportion the managers feel is reasonably necessary) of the estimated four year cohort expected to return to the river. We feel the guiding principle should be the long term survival of fall run Klamath Chinook and not fishing opportunity, but we are convinced that the long term survival depends primarily on habitat improvement and securing increased water flow to the Klamath -Trinity system for the benefit of anadromous fish. Our concern is based not just on the dismal forecast for 2005, but on the certainty of this scenario repeating itself in future years and the realization that the Klamath River will continue to negatively

influence the ability of the Pacific Fisheries Management Council to manage the ocean salmon fisheries for optimum yield. With that dilemma in mind, we feel managing for a proportional number is more realistic. At the same time, we strongly recommend that P.F.M.C. and the Department of Commerce become actively involved in the Federal Energy Regulatory Commission relicensing of the Klamath River hydro-electric dams and water management in the Klamath Basin by consulting with the Bureau of Reclamation.

Thank you for your consideration of our recommendations.

Sincerely,


LeRoy Ellingson, President
Oregon South Coast Fishermen

March 22, 2005

Pacific Fishery Management Council
Don Hansen, Chairman

RECEIVED

MAR 24 2005

Dear Sir,

PFMC

The following are points that may not have been factored into the models for our coming 2005 Salmon Season.

Looking over the various options I am of course confused. And after attending the Calif. Fish & Game meeting in Oakland April 18, 2005 with the commission present, I'm even more confused. Without getting into a lot of detail of which were all familiar, allow me to bring up a couple of points that may have been overlooked.

First, I've been told that the results of a 3 year test fishery (*between Fort Ross and Point Reyes, Ca. and out to six miles) had not given a serious enough weighting when the current models were structured. Because this is probably the only multiple year hard open ocean data that exists, I can't imagine why it wasn't valued higher. The only thing I've heard was that it didn't go out in the ocean far enough. Well, these boundary perimeters were set by the National Marine Fishery Service and were followed precisely. The results of course are well known, and they were that the take of Klamath stocks in this area over a three year period were infinitesimal as were winter run Sacramento System Salmon. The results after these three long years was that the coast was opened the next year May 1st to September 31 from Point Arena south. The fact that they were closed in the first place is obviously the result of a wild guess. A wild guess that was wrong and cost our fishermen and associated infrastructures millions of dollars. And of course no apologies were ever received for the mistake.

*Years 1998, 1999 & 2000.

On the good side we remaining fishermen had one of our best seasons in 2004. Not only did we catch and produce a top quality product, we were able to re-establish a number of important previously lost markets. Infact there is now a demand for our California Kings and the price is more promising than in years. The fact we now have a chance to complete effectively with the farmed product is most encouraging.

By shutting us down again, a second consideration that has apparently been overlooked is the increased escapement entering the Sacramento River-System. Over the last few years, we've heard horror stories of the Salmon that can't get into the hatcheries because the hatcheries are plugged and the gates are shut. With the new 2005 options and less fish taken by fishermen the numbers of returning salmon will add significantly to the excess thousands already trying to spawn on top of each other near the hatcheries. The results are two fold.

(1) There is no production from these thousands of fish and (2) their rotting carcasses may deprive released fry enough oxygen in the water for them to survive. Or lice and other fungi picked up may cause them to die in the ocean. With 2 to 3 times the numbers of spawning salmon headed for the same fate, it could become an environmental problem and cause a further mess.

Please review the results of the valid and expensive test fishery records and hopefully re-evaluate. And also try to envision our concerns about over polluting the Sacramento System with tons of dead fish (or rotting garbage) in the best King Salmon System in the world. Don't let this great resource be ruined for any reason!

Thank You,



George Boos
Fishermen, Bodega Bay (30 years)

P.O. Box 754 - 94923

[Fwd: Summer ocean salmon season]

Subject: [Fwd: Summer ocean salmon season]
From: "PFMC Comments" <pfmc.comments@noaa.gov>
Date: Thu, 24 Mar 2005 11:11:48 -0800
To: Chuck Tracy <Chuck.Tracy@noaa.gov>

----- Original Message -----

Subject: Summer ocean salmon season
Date: Thu, 24 Mar 2005 06:57:24 -0800
From: Carl Kopacek <CKopacek@jrca.com>
To: <pfmc.comments@noaa.gov>

Gentlemen:

Why open the silver season in June when the fish are small? The quota will surely be caught, so why open so soon? Why not harvest a quota of 9 lb fish instead of 6 lb fish. The charter boats will still be able to catch the same number of fish, whether the season begins in June or August. You people are idiots for allowing the season to open so soon!!

Don't think I don't love to fish because I do. But let's use some common sense.

Sincerely,
Carl Kopacek

Craig Foster

From: spirit.spirit@verizon.net
Sent: Friday, March 25, 2005 1:01 PM
To: Craig Foster
Subject: Public Hearing in Coos Bay
Importance: High

Hi Craig

When you go to Coos Bay next week, you might read into the record:

- 1) John Fraser from Brookings would like a 30 fish/day possession and landing limit in the K)September opportunity
- 2) Newport Trollers would like to modify their May opporutnity as it is not the complete month to a 4 on and 3 day off series starting on May 1, 2005

See ya

Don

3/25/2005

Subject: July & August closure

From: georgemrose@webtv.net (George Rose)

Date: Sun, 27 Mar 2005 07:24:34 -0800

To: Chuck.Tracy@noaa.gov

Why not limit the daily bag limit for salmon in the southern Oregon coastal area to 1 salmon per day, rather than close the season for July and half of August? It would seem to accomplish the same goal, and provide some sport fishing for all, and do less damage to the local economies. Thank you,
George Rose



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April Council Agenda
Agenda Item C.6

March 29, 2005

VIA facsimile (503) 820-2299
and via email [by copy to Chuck.Tracy@noaa.gov]

Mr. Donald Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place
Suite 200
Portland, OR 97220-1384

Re: Snohomish County PUD's Comments Regarding Pacific Fisheries Management Council 2005 Management Options

Dear Chairman Hansen and members of the Council:

Snohomish County PUD appreciates the opportunity to comment on this year's proposed Council salmon management options, and we appreciate the increased transparency of the Council's salmon harvest decision-making. However, we object to the Council's proposed 2005 options and request the Council to restrict ocean salmon harvest in order to (a) prevent ocean harvest impacts on endangered or threatened species ESA stocks, and (b) reduce the economic impact of ocean harvest on citizens who are not in the commercial fishing industry. The Council regulates a mixed stock fishery. The inevitable result of the Council-authorized ocean salmon harvest, is a taking of ESA endangered or threatened salmon that cannot be considered "incidental" or "accidental."

Snohomish County PUD's Interest

Snohomish County PUD is the largest public utility district in the Northwest, providing electric service to over 670,000 citizens in Snohomish County and Camano Island in Washington. Snohomish County PUD is also the largest single power customer of the Bonneville Power Administration ("BPA"), purchasing approximately ten percent of all BPA marketed power. Each year Snohomish County PUD customers pay over \$70 million dollars of BPA's annual \$700 million fish and wildlife costs (both direct and indirect costs and foregone revenue). This is one of the PUD's largest annual costs, exceeding its total annual payroll and is over two times what we pay BPA for transmission services. BPA's fish and wildlife costs and lost revenues have a direct and significant adverse impact on the customers and businesses we serve.

The Council Options Allow Improper Levels of Harvest on ESA Salmon

One thing is clear in the controversy over ESA listed Northwest salmon: Continued ocean harvest by the commercial fishing industry will delay or prevent recovery of threatened or endangered salmon. Allowing continued ocean harvest of listed salmon violates both the Endangered Species Act and the Magnuson-Stevens Act (whether the ocean harvest is called "overfishing" or "bycatch").

NOAA Fisheries Consultation Standards Are Too Lax

NOAA Fisheries (formerly called NMFS) applies the wrong test to allow continued ocean salmon harvest on listed species. The current NOAA test is to allow ocean harvest if it does not "substantially impede recovery." This reflects an ocean harvest bias that may be the result of NOAA Fisheries' conflicting roles as both an ESA protector and a fisheries/commerce promoter. NOAA Fisheries incorrectly asserts that its hands are tied by treaty and Magnuson-Stevens Act requirements. But there is no legal obligation to allow ocean harvest of threatened or endangered species any more than there is an obligation to allow the killing and sale of eagles, whales or other listed species.

If fish are threatened with extinction and recovery is the goal, then no one should be permitted to continue to intentionally catch and kill them in large numbers for commercial sale. The July 2000 "Recommendations of the Governors of Idaho, Montana, Oregon and Washington for the Protection and Restoration of Fish in the Columbia River Basin" addressed the question diplomatically (at p. 11):

[H]arvest rates must ensure sufficient escapement to rebuild declining stocks. With in river harvest rates ranging up to 31 percent for one of the listed stocks, we are not convinced that current practices are compatible with rapid recovery. . . .

NOAA Fisheries' Salmon Recovery Science Review Panel was more blunt:

Apparently substantial harvest of listed ESUs continues to be permitted by NMFS, e.g. up to about 50% per year for components of the Lower Columbia Chinook and Snake River Fall Chinook. . . .

NMFS personnel involved in setting allowable harvests . . . indicated that allowable harvests are set so as not to substantially impede recovery. Substantial was never defined quantitatively in this context. It appears to us that NMFS personnel involved in setting allowable harvest rates use subjectivity and legalism, and their inability to promote a transition to terminal fisheries to justify biologically unsustainable harvest rates on several listed ESUs. . . . Furthermore, it

appears that harvest decisions are never connected with other factors in an overall restoration and recovery plan. . . .

We recommend that NMFS carefully reexamine the procedures by which allowable harvests are suggested and approved. Legal and policy constraints under which NMFS operates (Indian treaty rights and the Magnuson-Stevens Act) in its management of listed ESUs should also be carefully reexamined to determine whether they are superseded by the Endangered Species Act. . . . Finally, the procedures for setting allowable harvests should be integrated with other aspects of restoration and recovery so that harvest impacts can be compared to other factors affecting population viability. . . .

We were frustrated . . . to hear discussion of optimal harvesting strategies, as if no other factors were involved Indeed, it was our view that it was this isolation that led to some counterintuitive recommendations, such as to continue the harvesting of declining populations. . . .

NMFS should develop a rational policy that does not demean scientific common sense.

Quotes from Salmon Recovery Science Review Panel, Report for the meeting held August 27-29, 2001, pp. 7-12. (Available at research.nwfsc.noaa.gov/trt/RSRP_Aug01.pdf).

Snake River Fall Chinook Harvest: A Case Study

According to the Council's summary of 2004 Ocean Fisheries, (at p. 43):

In the *Proposed Recovery Plan for Snake River Salmon*, NMFS has proposed a delisting goal for Snake River fall chinook that provides for an eight-year (approximately two generation) geometric mean of at least 2,500 natural spawners in the mainstem Snake River annually; the eight-year mean through 2003 is 1,271.

NOAA Fisheries' current "consultation standard" for Snake River fall chinook ocean harvest impacts apparently permits ocean harvest that is not more than 70% of the average ocean harvest of those stocks between 1988 and 1993. (It would be helpful for the Council to specify what percentage of the run is taken in ocean harvest.) Mainstem Columbia fisheries are then apparently allowed to catch up to 31% of the Snake River fall chinook that escape ocean harvest. The combination of Southeast Alaska, Canadian and Council ocean fisheries and mainstem harvest permitted by NOAA Fisheries' "consultation standard" appears to allow harvest of about 40% to 50% of the ESA listed Snake River fall stock annually. These are fish that have fully matured and are ready to return to the Snake River to reproduce.

Assuming that there had been no ocean harvest of Snake River fall chinook instead of the ocean harvest allowed by NOAA Fisheries over the past eight years, the eight year geometric mean escapement of these fish would be much closer to much closer to reaching NOAA Fisheries' proposed recovery goal for Snake River fall chinook. If the 50% harvest did not occur, the NOAA Fisheries proposed delisting goal could be achieved ($1,271 \times 2 = 2,542$).

The salmon recovery costs that are being borne by BPA customers and Snohomish citizens as a result of this continued ocean harvest are staggering. For example, in the last two years, BPA customers have called for the suspension of "summer spill" for a test and evaluation of the cost and benefits. The estimated value in suspending summer spill in those two years would have allowed the generation of over \$200 million worth of power at the cost of the loss of less than 100 listed Snake River fall chinook.

In contrast, the Council's estimated value of the *entire* North of Cape Falcon non-Indian commercial troll council fishery, under "Option I" (which the Council has acknowledged is likely to violate even the NOAA Fisheries consultation standard for Snake River fall chinook) is less than \$2 million, and the estimated "Coastal Community Income Impacts" of the Council's North of Falcon recreational ocean fishery is estimated to be \$7,625,000. As a result, BPA customers including Snohomish County PUD are paying millions of dollars to protect a few listed fish from accidental loss from the effects of the federal hydro system, only to have the Council allow those same fish to be killed intentionally in ocean commercial harvests.

Recommendations Regarding 2005 Council Fisheries – Reject Option I and Develop an Ocean Harvest Option that Protects Listed Species

The Council should reject Option I and any proposal to harvest more Snake River fall chinook than the NOAA Fisheries consultation standard allows. The Council also should work with other harvest managers to shape ocean harvest levels so that the stocks of concern meet escapement goals. These include reducing the ocean harvest in Council fisheries of Columbia Lower River Natural Tules (threatened), Columbia Lower River Wild chinook (threatened), Snake River Fall chinook (threatened), and Sacramento River Winter chinook (endangered). The Council should also work with other co-managers to ensure that other listed stocks (e.g., Puget Sound chinook salmon) also receive more aggressive protection. The Council's failure to do so would violate not only violate the Endangered Species Act, but also the Magnuson-Stevens Fishery Conservation and Management Act ("Magnuson Act"), as amended by the Sustainable Fisheries Act, P.L. 104-297, 110 Stat. 3559 (codified at 16 U.S.C. § 1801 et seq.), the Endangered Species Act ("ESA"), 16 U.S.C. § 1531 et seq., the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4331, Regulatory Flexibility Act, 5 U.S.C. §§ 601 et seq., and the Administrative Procedure Act ("APA"), 5 U.S.C. § 551 et seq.

Snohomish County PUD urges the Council to take immediate steps to end or significantly reduce the ocean harvest of salmon listed as threatened or endangered under the ESA. Thank you again for the opportunity to comment.

Very truly yours,

Public Utility District No. 1 of Snohomish County

By: _____

Steve Marshall, Assistant General Manager