

Amendment 15 Comments by Dave Hillemeier, September 15, 2006
(Yurok Tribal Fisheries Program Manager)

In light of the rushed schedule regarding the development of the proposed amendment, as well as its relatively incomplete status, the Yurok Tribal Council has not had an opportunity for adequate review. Therefore, my comments will be brief and primarily technical in nature, with more comments from the Tribal Council to be developed at a later time.

When considering alternatives that would allow fishing below the 35,000 natural spawning escapement floor, the Yurok Tribe recommends that a precautionary approach be taken. Such an approach is in-line with the management philosophy implemented by the Tribal Council each year when they structure their spring and fall fisheries. A primary consideration for the Tribal Council is that current fishery management actions do not negatively affect the fishery that future generations of Yurok People will depend upon.

Our primary concern with Amendment 15 as it's being developed is the potential effect that fishing upon extremely low stock abundances may have upon sub stocks within the basin. In particular, we are concerned that the genetic integrity of sub stocks not be compromised, as these genetic resources are what will be necessary for viable fisheries to exist into the distant future.

Members of the Salmon Amendment Committee have recently undertaken efforts to quantify the relationship between various basin-wide escapement levels and extremely low returns to three of the primary sub stocks within the Basin (the Shasta, Scott, and Salmon Rivers). While this analysis is appreciated, it should be kept in mind that these three sub stocks are being used as a surrogate for many other sub stocks within the basin; some of which are typically much less abundant than these three primary sub stocks (e.g. Blue Creek and surrounding tributaries).

As the PFMC contemplates the alternatives for this proposed Amendment, it is important to remember the scope of the Amendment. As was noted in the handout from the Salmon Amendment Committee, De minimis refers to something so little, small, miniscule, or tiny that effects need not be considered. That is not what is reflected in some of the current alternatives that are under consideration for the amendment. In fact, a harvest rate as large as 16% upon age-4 fish has only been targeted during two of the past 15 years (16% in 2003 and 17% in 1996). The 16% age-4 ocean harvest rate equates to approximately a 45% spawner reduction rate; hardly within the realm of having a miniscule affect upon Klamath fall Chinook.

Given that a large portion of Klamath River fall Chinook harvest occurs in river fisheries, it's important to understand the total impact to the stock when considering various alternatives. Therefore, I recommend that when the Amendment goes out for public review, all options be presented to the public in terms of spawner reduction rates, as these much more clearly illustrate the impacts to the stock than does an age-4 ocean harvest impact rate.

For example, at first glance a 10% age-4 ocean harvest rate may seem somewhat minimal to some, however such a fishery would actually result in a spawner reduction rate of approximately 28%; an impact that may be considered to be outside the realm of "miniscule".

Given the somewhat incomplete status of the Amendment and associated analysis, which is largely driven by an extremely ambitious time line for amendment development, we recommend that the schedule regarding adoption of a preferred alternative by the Council be delayed.

Finally, I'd like to acknowledge that many of the problems facing Klamath Basin fall Chinook are not harvest related, but related to habitat conditions within the river. The PFMC is well aware of this, as is reflected by the many letters that have been sent requesting that actions be taken to remedy these problems.

There is momentum underway to resolve the habitat issues that have caused the decline of the Klamath Basin's fishery resource. We have hope that within the not too distant future we will see four dams removed from the river; an action that would result in major improvements to the fishery. We also believe that current efforts by interests from throughout the Basin working together to develop long-term solutions will result in substantial benefits to the fishery. As these long-term solutions to the Basin's problems are on the horizon, it is important that fisheries continue to manage Klamath Fall Chinook in a prudent, responsible manner.

Thank you.