

# PACIFIC FISHERY MANAGEMENT COUNCIL

2130 SW Fifth Avenue, Suite 224  
Portland, Oregon 97201

Telephone: (503) 326-6352

EXECUTIVE DIRECTOR  
Lawrence D. Six

CHAIRMAN

Robert C. Fletcher

October 30, 1996

Governor John A. Kitzhaber  
Salmon Plan Review  
Capitol Building  
Salem, Oregon 97310

Dear Governor Kitzhaber:

The Pacific Fishery Management Council (Council) would like to provide some brief comments on the draft *Oregon Coastal Salmon Restoration Initiative (CSRI)*.

We first would like to recognize and endorse the considerable effort that you and your administration have put forth in committing to rebuilding Oregon's coastal salmon stocks. The CSRI draft plan reflects your strong commitment to healthy sustainable fish populations upon which fishing communities depend.

Our comments on the draft CSRI are as follows:

1. The CSRI needs additional impetus to assure habitat protection and restoration.

We agree that voluntary approaches to solving the salmon crisis are preferable to additional regulatory burdens on Oregon's citizens and natural resource industries. However, in the past several years, the Council has imposed severe restrictions on ocean coho salmon fisheries along the entire West Coast. These closures have been at great cost to salmon dependent communities. The purpose of the closures has been to return more spawners to the streams. If adults return to natal streams that are of poor quality for spawning and rearing, then the inordinate sacrifice of our fishing community is diminished.

The Council believes that fisheries restrictions which result in economic hardship on the recreational and commercial fishing industries and dependent coastal communities, must be accompanied by concomitant measures which address the serious habitat problems faced by anadromous fishes. In addition, the burdens (and benefits) of natural resource management must be shared by all the citizenry.

Therefore, the CSRI should emphasize enforcement and monitoring of the existing habitat regulations on state and private lands and recommend stronger rules where needed. Specifically, forest practice regulations protecting small fish bearing streams on state and private lands may be inadequate to ensure full protection of anadromous resources. Also, management of Oregon's range and crop lands needs to reflect a commitment to reducing negative impacts on water quality.

2. Long-term commitment, funding and monitoring is essential.

Recovery of anadromous salmon stocks will require years if not decades. We hope that the final plan will be constructed so that it is shielded from the inevitable fiscal and political changes in years to come. We anticipate that a challenge to the CSRI's success will be the securing of sufficient long-term, stable funding. This funding will be especially vital in monitoring the success of the program. Without proper monitoring, the long term vision of your program may be lost on future administrations, state legislators, industry and taxpayers, who will undoubtedly ask for fiscal accountability.

3. Emphasis is needed on protecting habitat outside the core areas.

We agree that the CSRI's identification and protection of "core areas," is an important building block in our salmon recovery efforts. However, in some instances, core area management may be compromised by events that occur miles away from those areas. For example, lower gradient sections of coastal streams provide important coho winter habitat. If the benefits of productive (healthy or core area) upstream spawning and summer habitats are to be realized, then properly functioning winter habitat must be available to realize gains further upstream.

In closing, we are excited about the prospects presented by the CSRI. We are grateful for your leadership and look forward to participating in this process.

Sincerely,



Robert C. Fletcher  
Chairman

SP:hmm

- c. Rudy Rosen
- Habitat Committee
- Will Stelle
- Hilda Diaz-Soltero