

PACIFIC FISHERY MANAGEMENT COUNCIL

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May 16, 2005

Ms. Amy Hansen, District Manager
Shasta Valley Resource Conservation District
215 Executive Court, Suite A
Yreka, CA 96097

Dear Ms. Hansen:

Thank you for your letter commenting on the Council's salmon fishing options for 2005. The Council tasked me with responding to your letter based on their discussion of it during the recent Council meeting in Tacoma, Washington. The Council is responsible for developing salmon fishing regulations for ocean fisheries, which are approved and implemented by the Department of Commerce. The Council has an approved Fishery Management Plan for salmon fisheries with a conservation objective for Klamath River fall chinook of a minimum of 35,000 naturally spawning fish. Achievement of this spawning escapement objective and sharing of fish in excess of the objective with Klamath in-river fisheries is the basis of the Council decision on ocean salmon seasons for 2005.

As you know, the abundance forecast for Klamath River fall chinook in 2005 is low enough to severely constrain ocean fisheries in Oregon and California; however, there are adequate numbers of fish to provide some limited fishing opportunity and still achieve the required conservation objective. The conservation objective is based on the principle of that salmon populations do not continue to increase with increased spawning beyond a certain point. There is good evidence that this concept applies to Klamath River fall Chinook, as the historical record shows many of the largest returns resulted from modest spawning escapements, while there have been smaller returns from larger spawning escapements.

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Regarding your contention that there is no harvestable surplus of salmon and harvest management should reflect that perception, the Council believes it is important to limit impacts on stocks of concern in order to achieve conservation objectives and provide for sustainable harvest over the long term, and the Council has set this as its highest priority. However, completely eliminating all fishing impacts to Klamath fall chinook would have required closing fisheries throughout this stocks range. Klamath fish have been known to occur in virtually every salmon fishery from the Neah Bay area in northern Washington to marine areas south of Monterey, California. The Council has an obligation to provide for sustained participation of fishing communities when formalized conservations objectives are met, and closing of the Pacific Coast in California, Oregon, and Washington to salmon fishing when there are fish available would not satisfy that obligation.

Eliminating fishing impacts entirely is akin to eliminating all freshwater salmon habitat impacts, including such things as agricultural and domestic water withdrawals, stream-side canopy and vegetation alterations, and any potential water run-off impacts. The Council has not requested eliminating impacts from any one source of mortality and does not feel it appropriate that ocean fishery impacts should be eliminated unless required by our Fishery Management Plan or other legal directive, especially, as you point out, when the cause of the problem lies primarily elsewhere.

The Council appreciates your interest and concern with the fishery and water use issues in the Klamath Basin and understands that the best chance at solutions lie in cooperation and understanding. Please feel welcome to attend Pacific Council meetings to view first-hand how seriously conservation of Klamath fall Chinook salmon is taken during the season-setting process. If you have further questions or comments on the process or rationale by which the 2005 ocean salmon seasons were adopted, please contact Mr. Chuck Tracy, our staff officer for salmon issues.

Sincerely,



D. O. McIsaac, Ph.D.
Executive Director

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c: Council Members
Dr. John Coon
Ms. Jennifer Gilden
Mr. Chuck Tracy
Salmon Advisory Subpanel