March 15, 2012

To: Chairman, Pacific Fishery Management Council

Subject: Comments on CROOS Program

Although the CROOS project has numerous aspects, the focus on which it was sold to the industry was the goal of "targeting" the SRFC stock. For several years prior to 2007, harvest of a strong SRFC stock was constrained by weak performance of Klamath fish, resulting in large surplus escapement, far in excess of escapement goals. Unfortunately, when CROOS actually got rolling in 2007, SRFC fish swooned into a historically unprecedented five-year stock collapse. The five years of data collected in this period is not particularly meaningful, since they all represent historically miniscule stock sizes, sizes that are not economic to exploit.

An unusual confluence of ocean conditions and water in California rivers has precipitated a return to a reasonable stock size (more so in the Klamath!). This fits a conjectural pattern of boom and bust described in "What Caused the SRFC Stock Collapse."

Unfortunately, this hopeful development of several (?) years of decent returns is accompanied by complete disarray in management of SRFC. We have:

- (1) To understand why the five-year stock collapse occurred.
- (2) Why the unfathomable collapse of the relationship between jacks and adults.
- (3) Deal with the threat of overfishing lawsuits

All of the above dictate a very conservative harvest policy on SRFC, which is obviously being implemented by the Council.

It appears from Dr. Lawson's power point slides that the CROOS goal is still to develop targeting on SRFC. The question is, will there be any excess to target in the future, or a suitable predictor to enable that exploitation?

The obvious first order of business here is to determine what is going on with the SRFC. Any available funding should be dedicated to this issue. CROOS has received federal funding for quite a few years. It is time for a review of the project by independent scientists.

In the long run, management should be looking at what happens when the PDO goes back to positive (warm). 2007 to 2011 could become the norm, if not sooner. More attention should be focused on the issue of stock resilience, again referring to the "Cause" document.

I am very recently retired salmon troller who retains an interest in the long-term health of the resource.

Carl Finley