

#1

From: **Kohei Kikuchi** <kkikuchi@sbcglobal.net>
Date: Mon, Feb 6, 2017 at 11:45 AM
Subject: Salmon season - 2017 / Pt. Sur to U.S./Mexico Border (Monterey South)
To: Mike.Burner@noaa.gov

Hi, Mike – my name is Kohei Kikuchi. I am a registered voter and a recreational fisherman residing in San Luis Obispo County. I am writing to you in regards to our upcoming salmon season for 2017. In 2016, our season was cut short. From my understanding, the PFMC and SAS both recommended a 02APR to 13NOV season. At the point of decision, the recreational season was changed to 02April to 30April and 07May through 17July, while the commercial season remained open longer. If the reasoning was to alleviate the effect on the salmon, I am not sure this move made much sense. There is a vast disparity between commercial and recreational take. Please consider keeping our salmon season open longer.

Best Regards,

Kohei Kikuchi
Arroyo Grande, CA

#2

From: **Ryan E.** <ryanerbstoesser@gmail.com>
Date: Mon, Feb 6, 2017 at 7:44 PM
Subject: Salmon Comments
To: pfmc.comments@noaa.gov

Hello,

Comments on CDFW Recommendations for the 2017 Salmon Season

As recreational fishermen fishing in Morro Bay/Avila, we feel that we should be allowed to fish into June especially if the commercial fleet is allowed to take salmon in June. We were not treated fairly in 2016 salmon season. We were closed on June 1 while the commercial salmon fleet was allowed to keep fishing through the month of June even though they kill many more fish. The same closure dates are now being recommended for 2017. There is no justifiable scientific reason to close the recreational fishing in June while leaving the commercial fishery open.

Our position is that the CDFW Recommendations use flawed analysis to determine the impact to the population of concern, endangered winter-run (WR) Chinook, and that there is no good reason to close the recreational season in Morro Bay/Avila while the commercial season stays open. We ask that CDFW review our reasoning below, then work with us to ensure equitable access to the resource in 2017.

Impact Rate Should Include Mortality of "Shorts" Released by Commercial Fishermen

The CDFW Recommendations report the impact rate on WR Chinook for Morro Bay/Avila in June as 1:200 for commercial and 1:9 for recreational. As observed in the document, this difference is due to the higher size limit for commercial (27") vs. recreational (24"). The methodology used to derive this impact rate is flawed and misleading because it does not correctly account for the mortality of released fish between 24"-27" by the commercial fleet.

The commercial salmon fleet in Morro Bay/Avila is fishing the exact same waters and the exact same body of fish as the recreational fishermen to the extent that they must avoid each other while trolling to prevent crossing lines. Commercial fishermen are absolutely hooking the same WR fish at the same rate (1:9) as recreational fishermen. The only difference is that the commercials have to release the 'shorts' under 27" but many of these fish do not survive. A simple reasonableness check demonstrates that wide difference between the 1:200 impact rate for commercial and 1:9 impact rate for recreational cannot be correct.

Mortality rates for released shorts were, unfortunately, not included in the CDFW Recommendations draft document but we were told by Michael O'Farrell of NOAA that it is 31% for Commercial and 19% for Recreational. If we apply the mortality of releases, the minimum possible impact rate on fish > 24" for commercials is the recreational impact rate times the commercial mortality rate: $1/9 * .31$ or 1:29 not 1:200 reported in the document which is clearly a gross underestimate.

There is no data in the document on how many WR Chinook in the June population are < 24", but, since all are released, commercial will have a greater impact rate on these fish (31% mortality) than recreational (19% mortality).

Impact vs. Impact rate

The CDFW Recommendations analysis focuses entirely on analyzing the impact rate. As we have shown, this rate calculation is flawed because it does not account correctly for the significant mortality of released fish, but, beyond that, the analysis does not consider the number that is most relevant to the survival of WR Chinook: total fish kills (total impact).

For June in Morro Bay/Avila, recreational fishermen kill an average of 100 fish of which 1:9, or 11 fish are WR. Commercial fishermen catch an average of 700 fish of which 1:200, or 3 fish are WR but in doing so they are also killing 31% of fish < 27". The CDFW document does not include data on population of WR by size and without this information it is not possible to calculate the total WR fish kill by commercial fishermen but it will clearly be much higher than the 11 fish killed by recreational fishermen.

Alternative Size Limit In June For Recreational Fisherman

Recreational fishermen in Morro Bay/Avila are almost entirely fishing from small private boats, generally only fish in calm weather and, of course, are bound by a two fish bag limit. Closing the salmon fishery in June has a significant impact on us because the best weather is in June and the kids are off school so we lose recreational opportunity. It is frustrating to be closed while the commercial fishery stays open when we know they are killing many more WR fish than we are.

The impact rate of the recreational fishery is much closer to the commercial rate if mortality of released shorts is properly accounted for. Additionally, the recreational fishery has a much lower total impact. We should be able to continue fishing as long as the commercial fishery is open.

If CDFW believes that the resource can tolerate the impacts of the commercial fleet in June with a 27" size limit but cannot tolerate the impacts of the recreational fleet with a 24" size limit, then the simplest way to avoid June closure of the recreational fishery is to raise the recreational size limit to 27" on June 1. With the size limits equal, the commercial fishery will actually have a greater impact rate than recreational due to higher mortality of released shorts, as well as a greater total impact due to higher impact rate and much larger number of fish caught.

Thank you,
Ryan

#3

From: **William Stallcup** <wpstallcup@gmail.com>

Date: Tue, Feb 7, 2017 at 11:14 AM

Subject: Comments on CDFW Recommendations for the 2017 Salmon Season

To: pmmc.comments@noaa.gov, Mike.Burner@noaa.gov

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William Stallcup
Morro Bay, Ca
[\(805\) 835-8814](tel:8058358814)

#4

From: **Ann Wisehart** <Wisehart@impulse.net>
Date: Tue, Feb 7, 2017 at 10:50 AM
Subject: Comments on CDFW Recommendations for the 2017 Salmon Season
To: pmmc.comments@noaa.gov
Cc: Mike.Burner@noaa.gov

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#5

- Forwarded message -----

From: **David Hudgens** <davedenni@hotmail.com>

Date: Tue, Feb 7, 2017 at 8:56 AM

Subject: Fw: Proposed 2017 Recreational Salmon Season - Pt. Sur to Mexican Border

To: "pmmc.comments@noaa.gov" <pmmc.comments@noaa.gov>

I am a recreational fisherman on the Central Coast of California and have been fishing these waters for the last 45 years. I understand that the California Department of Fish and Wildlife is once again proposing or recommending that our upcoming season be shortened as it was for 2016 to two months - April and May. I understand these regulations are designed to help reduce the take of winter run salmon from the Sacramento watershed.

While I understand the plight of the winter run fish, there needs to be a more even approach to the protection of the run, meaning both commercial and sport and northern ports should all be equally affected. Also the drought has affected everyone with the lower river levels and poor survival rates. However, the Pt. Sur to the Mexican border shouldn't be made to shoulder the brunt of the restrictions.

Last year the Salmon Advisory Subpanel (SAS) recommended to the PFMC in March 2016 three alternatives that in the worst case scenario would have stopped us from fishing in our area (Port San Luis, Morro Bay) in mid-July as it was in 2015. At some point late in the process one of the original alternatives (the 3rd alternative - mid-July closure) was overruled and thrown out, and a more draconian alternative for our area was implemented - seemingly without the

science to back up the reasoning. It was added at the last minute and no one in our area was given the opportunity to rebut the alternative. This alternative only allowed us to fish for salmon for two months - April and May. Why was the SAS overruled? And was it political?

Since commercial fishing was still open in June 2016, it was hard for recreational fishermen in our area to understand why we were cut off and they were allowed to continue to fish. Especially when their continuing to fish would have a greater impact on the winter run salmon according to the California Department of Fish and Wildlife's scientific analysis. According to the analysis that I have read, there are more winter run salmon in our area during the June-August timeframe.

Based on this same scientific data, there does not seem to be any supporting data that recreational fishing stopped in May affects the take of the winter run salmon, especially when the commercial fishing continues through June. All that did was change who caught the fish.

Also, it appears as though some apparent political agenda is at work here and the recreational fishing in our area is used as the proverbial sacrificial lamb. In 2016, the ports just to the north, Monterey Bay and Santa Cruz, were allowed to continue fishing through mid-July, while the more northern ports were allowed to fish through the end of October. The inequality of the fishing regulations seem to favor the northern ports where they have more voice in the proceedings.

Some factors to be noted for fishing in our area are:

1. The size of the fleet - it is a much smaller fleet than many of the ports up north thus a smaller footprint on the salmon catch.
2. Weather - in our area, during April, May, and June, the weather is more uncertain and therefore more limiting for the smaller boats to be out on the water. Most of the time, if you can get out on the water, you are limited to how far out you can go and how long you can fish as winds generally pick up in late morning and early afternoon. Typical spring weather that runs the smaller recreational boats off the water.
3. Other fleets in area - when the catch is less up north, the larger commercial boats converge in our area which increases the take in our area. This is what happened in June 2016. The salmon actually started to make an appearance and with salmon being caught the larger boats from distant ports showed up in mass.

Here are some possibilities that may help in determining the 2017 Recreational Salmon season that we would like to see considered for our area:

1. Propose that we continue to fish through June 30th with a 27" size limit on the fish - same as the commercial requirement.

2. Limit the number of days that we can fish, such as odd or even days throughout the season.
3. Propose that a salmon punch card be used limiting the number of salmon that can be taken over the course of the season. Once filled, you're done.
4. Limit area for commercial boats - meaning boats from outside the Pt. Sur to the Mexican border zone can not fish this area - especially if this area is such a hot zone for winter run fish.

There are probably other ideas out there being proposed and that would also work and keep us fishing longer than two months.

Over the years our seasons have been curtailed from a Feb-Oct season down to a Apr-May season (2016). It would seem that if any of these measures taken by the PFMC over the years were working, the seasons would be getting longer, not shorter. I worry that these changes will eventually lead to no salmon fishing at all, regardless of whether the numbers of the salmon, including the winter run salmon, improve.

Because I have been an avid salmon fisherman for years, I worry that future generations will not have the opportunity to catch and enjoy these great fish. I understand that there needs to be controls in place to preserve the runs, but not at the detriment for one specific area - us.

Sincerely,

David Hudgens
85 Guerra Dr. San Luis Obispo Ca.

#6

From: **Steve Hendricks** <shendric@cuesta.edu>
Date: Tue, Feb 7, 2017 at 9:24 AM
Subject: 2017 Salmon Season
To: "Mike.Burner@noaa.gov" <Mike.Burner@noaa.gov>
Cc: "pfmt.comments@noaa.gov" <pfmt.comments@noaa.gov>

To whom it may concern,

My name is Steve Hendricks and I am an avid angler in Morro Bay, California. I am also a former fish biologist with a B.S. in Freshwater Fish Biology from Humboldt State University and a M.S. in Fisheries and Wildlife from Oregon State University. Currently I teach biology at Cuesta College in San Luis Obispo. I am an environmentalist with a strong science background that loves to fish!

I have been working closely with Mike Glick and I am sure you have received his comments already, so I won't repeat them (see his comments below). I implore you to make your decision this year based upon sound science. Mike has pointed out several flawed calculations (the impact on WR by sport vs. commercial) and misuse of terms (impact vs. impact rate) in his comments. For a relatively small sport fleet to be shut down last year while a fairly large (I saw

30+ commercial boats out after May 31st) commercial fleet was allowed to continue to fish for salmon had no scientific merit based upon PFMC's own report. I am a conservationist and I am genuinely concerned about the long term survival of salmon. I was fully supportive of closed salmon seasons several years ago because I knew the salmon were at risk. I was also supportive of our short season last year, until I learned that commercial anglers could continue to take salmon for another month! It did not make any sense nor did it have any scientific merit. If the impact rate due to the increased minimum size for commercial anglers was the sole reason for allowing their season to stay open, then the logical solution would be to increase the size limit for sport anglers to 27" so we would have the same impact rate. Otherwise it seems like a political maneuver to shut down a small area with little representation to allow more powerful groups (commercial anglers) and more represented areas (Monterey/Santa Cruz) to fish longer.

Thanks for your time!

I look forward to your response.

Sincerely,

Steve Hendricks

(Glick) Comments on CDFW Recommendations for the 2017 Salmon Season

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#7

From: **Ray Cloud** <rccs@comcast.net>

Date: Tue, Feb 7, 2017 at 9:28 AM

Subject: 2017 Salmon Season Comments

To: pfmtc.comments@noaa.gov, Mike.Burner@noaa.gov

Cc: Mike Glick <wisehart@impulse.net>

A friend of ours thoroughly researched and wrote the following but we are in total agreement with every word of it. Closing recreational salmon while keeping commercial open in the best part of the season is patently unfair. We eat our own fresh-caught salmon as part of a heart-healthy diet, it is not just "recreation" to us. We need access to healthy salmon for our diet. We also have no problem with the size limit being increased to 27" for recreational in June, we release almost all fish under that size anyway as the smaller fish just don't have the right fat and omega-3 content.

It is also unfair to deny my two Grandsons ages 10 & 7 the opportunity to fish with their Poppi & Nanna, which they love. The weather/sea conditions in April and May are far too rough for them the vast majority of the time.

Please give these and the following points your most serious consideration.

Ray & Debi Cloud, and Grandsons Kyzen & Jaden, Lifelong Central Coast Anglers
529 Calle Grande Circle
Santa Maria, CA 93455

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#8

From: **Don Thompson** <rufescens@aol.com>

Date: Tue, Feb 7, 2017 at 10:07 AM

Subject: Re: proposed recreational salmon season 2017 pt Sur to mexico.

To: pfmtc.comments@noaa.gov

Dear sirs

The proposed recreational salmon season puts an unfair season reduction on those of us south of pt. Sur compared to anglers who live and fish from Monterey north.

If the season is shortened please cut equally across the board.

Last yrs season favored fishermen north of pt. Sur.

Also if the season is shortened to 2 months, please consider the two months open to be May and June instead of April.

Sincerely

Don Thompson

1434 Mission Dr.

Solvang CA 93463

#9

From: **David Hartmann** <Boatman10@comcast.net>

Date: Tue, Feb 7, 2017 at 10:16 AM

Subject: PFMC Comments

To: pfmc.comments@noaa.gov

I am a recreational fisherman on the Central Coast of California and have been fishing these waters for the last 21 years. I understand that the California Department of Fish and Wildlife is once again proposing or recommending that our upcoming season be shortened as it was for 2016 to two months - April and May. I understand these regulations are designed to help reduce the take of winter run salmon from the Sacramento watershed.

While I understand the plight of the winter run fish, there needs to be a more even approach to the protection of the run, meaning both commercial and sport and northern ports should all be equally affected. Also the drought has affected everyone with the lower river levels and poor survival rates. However, the Pt. Sur to the Mexican border shouldn't be made to shoulder the brunt of the restrictions.

Last year the Salmon Advisory Subpanel (SAS) recommended to the PFMC in March 2016 three alternatives that in the worst case scenario would have stopped us from fishing in our area (Port San Luis, Morro Bay) in mid-July as it was in 2015. At some point late in the process one of the original alternatives (the 3rd alternative - mid-July closure) was overruled and thrown out, and a more draconian alternative for our area was implemented - seemingly without the science to back up the reasoning. It was added at the last minute and no one in our area was given the opportunity to rebut the alternative. This alternative only allowed us to fish for salmon for two months - April and May. Why was the SAS overruled? And was it political?

Since commercial fishing was still open in June 2016, it was hard for recreational fishermen in our area to understand why we were cut off and they were allowed to continue to fish. Especially when their continuing to fish would have a greater impact on the winter run salmon according to the California Department of Fish and Wildlife's scientific analysis. According to the analysis that I have read, there are more winter run salmon in our area during the June-August timeframe.

Based on this same scientific data, there does not seem to be any supporting data that recreational fishing stopped in May affects the take of the winter run salmon, especially when the commercial fishing continues through June. All that did was change who caught the fish.

Also, it appears as though some apparent political agenda is at work here and the recreational fishing in our area is used as the proverbial sacrificial lamb. In 2016, the ports just to the north, Monterey Bay and Santa Cruz, were allowed to continue fishing through mid-July, while the more northern ports were allowed to fish through the end of October. The inequality of the fishing regulations seem to favor the northern ports where they have more voice in the proceedings.

Some factors to be noted for fishing in our area are:

1. The size of the fleet - it is a much smaller fleet than many of the ports up north thus a smaller footprint on the salmon catch.
2. Weather - in our area, during April, May, and June, the weather is more uncertain and therefore more limiting for the smaller boats to be out on the water. Most of the time, if you can get out on the water, you are limited to how far out you can go and how long you can fish as winds generally pick up in late morning and early afternoon. Typical spring weather that runs the smaller recreational boats off the water.
3. Other fleets in area - when the catch is less up north, the larger commercial boats converge in our area which increases the take in our area. This is what happened in June 2016. The salmon actually started to make an appearance and with salmon being caught the larger boats from distant ports showed up in mass.

Here are some possibilities that may help in determining the 2017 Recreational Salmon season that we would like to see considered for our area:

1. Propose that we continue to fish through June 30th with a 27" size limit on the fish - same as the commercial requirement.
2. Limit the number of days that we can fish, such as odd or even days throughout the season.
3. Propose that a salmon punch card be used limiting the number of salmon that can be taken over the course of the season. Once filled, you're done.
4. Limit area for commercial boats - meaning boats from outside the Pt. Sur to the Mexican border zone can not fish this area - especially if this area is such a hot zone for winter run fish.

There are probably other ideas out there being proposed and that would also work and keep us fishing longer than two months.

Over the years our seasons have been curtailed from a Feb-Oct season down to a Apr-May season (2016). It would seem that if any of these measures taken by the PFMC over the years were working, the seasons would be getting longer, not shorter. I worry that these changes will eventually lead to no salmon fishing at all, regardless of whether the numbers of the salmon, including the winter run salmon, improve.

Because I have been an avid salmon fisherman for years, I worry that future generations will not have the opportunity to catch and enjoy these great fish. I understand that there needs to be controls in place to preserve the runs, but not at the detriment for one specific area - us.

Sincerely,
David Hartmann
Lompoc, CA
[\(805\) 705-9001](tel:8057059001)

#10

From: **Steven morales** <chaysenfish@yahoo.com>

Date: Tue, Feb 7, 2017 at 8:53 AM

Subject: Salmon season

To: pfmc.comments@noaa.gov

To whom it may concern. My name is Steve and I respect you're decision re. Salmon season where I live. But, to close Avila beach area to salmon fishing in the month of June and still allow commercial fishing is hard too accept. Please look into this season closer and allow us too fish like the commercial guys and like they do north of us. Thank u

Steve

#11

From: **james george** <ibs480@hotmail.com>

Date: Tue, Feb 7, 2017 at 8:10 AM

Subject: california salmon season

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

I am a recreational fisherman on the Central Coast of California and have been fishing these waters for the last 45 years. I understand that the California Department of Fish and Wildlife is once again proposing or recommending that our upcoming season be shortened as it was for 2016 to two months - April and May. I understand these regulations are designed to help reduce the take of winter run salmon from the Sacramento watershed.

While I understand the plight of the winter run fish, there needs to be a more even approach to the protection of the run, meaning both commercial and sport and northern ports should all be equally affected. Also the drought has affected everyone with the lower river levels and poor survival rates. However, the Pt. Sur to the Mexican border shouldn't be made to shoulder the brunt of the restrictions.

Last year the Salmon Advisory Subpanel (SAS) recommended to the PFMC in March 2016 three alternatives that in the worst case scenario would have stopped us from fishing in our area (Port San Luis, Morro Bay) in mid-July as it was in 2015. At some point late in the process one of the original alternatives (the 3rd alternative - mid-July closure) was overruled and thrown out, and a more draconian alternative for our area was implemented - seemingly without the science to back up the reasoning. It was added at the last minute and no one in our area was given the opportunity to rebut the alternative. This alternative only allowed us to fish for salmon for two months - April and May. Why was the SAS overruled? And was it political?

Since commercial fishing was still open in June 2016, it was hard for recreational fishermen in our area to understand why we were cut off and they were allowed to continue to fish. Especially when their continuing to fish would have a greater impact on the winter run salmon according to the California Department of Fish and Wildlife's scientific analysis. According to the analysis that I have read, there are more winter run salmon in our area during the June-August timeframe.

Based on this same scientific data, there does not seem to be any supporting data that recreational fishing stopped in May affects the take of the winter run salmon, especially when the commercial fishing continues through June. All that did was change who caught the fish.

Also, it appears as though some apparent political agenda is at work here and the recreational fishing in our area is used as the proverbial sacrificial lamb. In 2016, the ports just to the north, Monterey Bay and Santa Cruz, were allowed to continue fishing through mid-July, while the more northern ports were allowed to fish through the end of October. The inequality of the fishing regulations seem to favor the northern ports where they have more voice in the proceedings.

Some factors to be noted for fishing in our area are:

1. The size of the fleet - it is a much smaller fleet than many of the ports up north thus a smaller footprint on the salmon catch.
2. Weather - in our area, during April, May, and June, the weather is more uncertain and therefore more limiting for the smaller boats to be out on the water. Most of the time, if you can get out on the water, you are limited to how far out you can go and how long you can fish as winds generally pick up in late morning and early afternoon. Typical spring weather that runs the smaller recreational boats off the water.
3. Other fleets in area - when the catch is less up north, the larger commercial boats converge in our area which increases the take in our area. This is what happened in June 2016. The salmon actually started to make an appearance and with salmon being caught the larger boats from distant ports showed up in mass.

Here are some possibilities that may help in determining the 2017 Recreational Salmon season that we would like to see considered for our area:

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2. Limit the number of days that we can fish, such as odd or even days throughout the season.
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There are probably other ideas out there being proposed and that would also work and keep us fishing longer than two months.

Over the years our seasons have been curtailed from a Feb-Oct season down to a Apr-May season (2016). It would seem that if any of these measures taken by the PFMC over the years were working, the seasons would be getting longer, not shorter. I worry that these changes will eventually lead to no salmon fishing at all, regardless of whether the numbers of the salmon, including the winter run salmon, improve.

Because I have been an avid salmon fisherman for years, I worry that future generations will not

have the opportunity to catch and enjoy these great fish. I understand that there needs to be controls in place to preserve the runs, but not at the detriment for one specific area - us.

Sincerely,
james george
lompoc,ca
[805-757-6281](tel:805-757-6281)

#12

From: **Reisbeck Jeani** <reisbecks@comcast.net>

Date: Mon, Feb 6, 2017 at 6:31 PM

Subject: Comments..Proposed 2017 Recreational Salmon Season - Pt. Sur to Mexican Border

To: pmmc.comments@noaa.gov

Cc: Steve & Jeani Reisbeck <reisbecks@comcast.net>

> I am a recreational fisherman on the Central Coast of California and have been fishing these waters for the last 45 years. I understand that the California Department of Fish and Wildlife is once again proposing or recommending that our upcoming season be shortened as it was for 2016 to two months - April and May. I understand these regulations are designed to help reduce the take of winter run salmon from the Sacramento watershed.

>

> While I understand the plight of the winter run fish, there needs to be a more even approach to the protection of the run, meaning both commercial and sport and northern ports should all be equally affected. Also the drought has affected everyone with the lower river levels and poor survival rates. However, the Pt. Sur to the Mexican border shouldn't be made to shoulder the brunt of the restrictions.

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> 3. Propose that a salmon punch card be used limiting the number of salmon that can be taken over the course of the season. Once filled, you're done.
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> 4. Limit area for commercial boats - meaning boats from outside the Pt. Sur to the Mexican border zone can not fish this area - especially if this area is such a hot zone for winter run fish.
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> There are probably other ideas out there being proposed and that would also work and keep us fishing longer than two months.
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> Over the years our seasons have been curtailed from a Feb-Oct season down to a Apr-May season (2016). It would seem that if any of these measures taken by the PFMC over the years were working, the seasons would be getting longer, not shorter. I worry that these changes will eventually lead to no salmon fishing at all, regardless of whether the numbers of the salmon, including the winter run salmon, improve.
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> Because I have been an avid salmon fisherman for years, I worry that future generations will not have the opportunity to catch and enjoy these great fish. I understand that there needs to be controls in place to preserve the runs, but not at the detriment for one specific area - us.
>
> Sincerely,
>
> Steve Reisbeck
> Santa Maria, CA
> [805-448-5601](tel:805-448-5601)

#13

Mike Glick <wisehart@impulse.net>

Feb 7, 2017 (10:57 AM)

Mike.Burner

As recreational fishermen fishing in Morro Bay/Avila, we feel that we should be allowed to fish into June especially if the commercial fleet is allowed to take salmon in June.

We feel that we were not treated fairly in 2016 salmon season. We were closed on June 1 while the commercial salmon fleet was allowed to keep fishing through the month of June even though they kill many more fish. The same closure dates are now being recommended for 2017.

Our position is that the CDFW Recommendations use flawed analysis to determine the impact to the population of concern, endangered winter-run (WR) Chinook, and that there is no good reason to close the recreational season in Morro Bay/Avila while the commercial season stays open. We ask that CDFW review our reasoning below, then work with us to ensure equitable access to the resource in 2017.

Impact Rate Should Include Mortality of "Shorts" Released by Commercial Fishermen

The CDFW Recommendations report the impact rate on WR Chinook for Morro Bay/Avila in June as 1:200 for commercial and 1:9 for recreational. As observed in the document, this difference is due to the higher size limit for commercial (27") vs. recreational (24"). The methodology used to derive this impact rate is flawed and misleading because it does not correctly account for the mortality of released fish between 24"-27" by the commercial fleet.

The commercial salmon fleet in Morro Bay/Avila is fishing the exact same waters and the exact same body of fish as the recreational fishermen to the extent that they must avoid each other while trolling to prevent crossing lines. Commercial fishermen are absolutely hooking the same WR fish at the same rate (1:9) as recreational fishermen. The only difference is that the commercials have to release the 'shorts' under 27" but many of these fish do not survive. A simple reasonableness check demonstrates that wide difference between the 1:200 impact rate for commercial and 1:9 impact rate for recreational cannot be correct.

Mortality rates for released shorts were, unfortunately, not included in the CDFW Recommendations draft document but we were told by Michael O'Farrell of NOAA that it is 31% for Commercial and 19% for Recreational. If we apply the mortality of releases, the minimum possible impact rate on fish greater than 24" for commercials is the recreational impact rate times the mortality rate: $1/9 * .31$ or 1:29 not 1:200 reported in the document which is clearly a gross underestimate. (It should be noted that the 1:29 impact rate is a BEST CASE scenario for commercial. A more rigorous analysis can only yield a WORSE impact rate for commercial).

Additionally, there is no data in the document on how many WR Chinook in the June population are less than 24", but, since all are released, commercial will have a greater impact rate on these fish (31% mortality) than recreational (19% mortality).

Impact vs. Impact rate

The CDFW Recommendations analysis focuses entirely on analyzing impact RATE. As we have shown, this rate calculation is flawed because it does not account correctly for the significant mortality of released fish, but, beyond that, the analysis does not consider the number that is most relevant to the survival of WR Chinook: total fish kills (total impact).

For June in Morro Bay/Avila, recreational fishermen kill an average of 100 fish of which 1:9, or 11 fish are WR. Commercial fishermen catch an average of 700 fish of which 1:200, or 3.5 fish are WR but in doing so they are also killing 31% of fish < 27" many of which are also WR but this goes unreported and unaccounted for in the CDFW document. The CDFW document does not include data on population of WR by size and without this information it is not possible to calculate the total WR fish kill by commercial fishermen but it will clearly be MUCH higher than the 11 fish killed by recreational fishermen when mortality of released shorts is included.

Alternative Size Limit In June For Recreational Fisherman

Recreational fishermen in Morro Bay/Avila are almost entirely fishing from small private boats, generally only fish in calm weather and, of course, are bound by a two fish bag limit. Closing the salmon fishery in June has a significant impact on us because the best weather is in June and the kids are off school so we lose recreational opportunity. It is frustrating to be closed while the commercial fishery stays open when we know they are killing many more WR fish than we are.

The impact rate of the recreational fishery is much closer to the commercial rate if mortality of released shorts is properly accounted for. Additionally, the recreational fishery has a much lower total impact. We should be able to continue fishing as long as the commercial fishery is open.

If CDFW believes that the resource can tolerate the impacts of the commercial fleet in June with a 27" size limit but cannot tolerate the impacts of the recreational fleet with a 24" size limit, then the simplest way to avoid June closure of the recreational fishery is to raise the recreational size limit to 27" on June 1. With the size limits equal, the commercial fishery will actually have a greater impact rate than recreational due to higher mortality of released shorts, as well as a greater total impact due to higher impact rate and much larger number of fish caught.

Mike Glick

Santa Barbara, Ca.

[805-450-6487](tel:805-450-6487)

#14

From: <tallyho1@charter.net>

Date: Tue, Feb 7, 2017 at 2:13 PM

Subject: Fw: Proposed 2017 Recreational Salmon Season - Pt. Sur to Mexican Border

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

I totally support everything Mr steve reisbeck sent to you on comments

#15

From: **Gary Foster** <foskie@sbcglobal.net>

Date: Tue, Feb 7, 2017 at 4:27 PM

Subject: Re: Proposed 2017 Recreational Salmon Season - Pt. Sur to Mexican Border

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

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Because I have been an avid salmon fisherman for years, I worry that future generations will not have the opportunity to catch and enjoy these great fish. I understand that there needs to be controls in place to preserve the runs, but not at the detriment for one specific area - us.

Sincerely,

Gary Foster Foster Enterprises Contruction
252 Albert Dr
San Luis Obispo Ca
foskie@sbcglobal.net

#16

From: **Jason Domingos** <jasondomingos@hotmail.com>
Date: Tue, Feb 7, 2017 at 3:51 PM
Subject: 2017 Salmon Season
To: "Mike.Burner@noaa.gov" <Mike.Burner@noaa.gov>

Hi Mike,

As recreational fishermen fishing in Morro Bay/Avila, we feel that we were not treated fairly in 2016 salmon season. We were closed on June 1 while the commercial salmon fleet was allowed to keep fishing through the month of June even though they kill many more fish. The same closure dates are now being recommended for 2017.

Our position is that the CDFW Recommendations use flawed analysis to determine the impact to the population of concern, endangered winter-run (WR) Chinook, and that there is no good reason to close the recreational season in Morro Bay/Avila while the commercial season stays open. We ask that CDFW review our reasoning below, then work with us to ensure equitable access to the resource in 2017.

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Mortality rates for released shorts were, unfortunately, not included in the CDFW Recommendations draft document but we were told by Michael O'Farrell of NOAA that it is 31% for Commercial and 19% for Recreational. If we apply the mortality of releases, the minimum possible impact rate on fish > 24" for commercials is the recreational impact rate times the commercial mortality rate: $1/9 * .31$ or 1:29 not 1:200 reported in the document which is clearly a gross underestimate.

There is no data in the document on how many WR Chinook in the June population are < 24", but, since all are released, commercial will have a greater impact rate on these fish (31% mortality) than recreational (19% mortality).

Impact vs. Impact rate

The CDFW Recommendations analysis focuses entirely on analyzing the impact rate. As we have shown, this rate calculation is flawed because it does not account correctly for the significant mortality of released fish, but, beyond that, the analysis does not consider the number that is most relevant to the survival of WR Chinook: total fish kills (total impact). For June in Morro Bay/Avila, recreational fishermen kill an average of 100 fish of which 1:9, or 11 fish are WR. Commercial fishermen catch an average of 700 fish of which 1:200, or 3 fish are WR but in doing so they are also killing 31% of fish < 27". The CDFW document does not include data on population of WR by size and without this information it is not possible to calculate the total WR fish kill by commercial fishermen but it will clearly be much higher than the 11 fish killed by recreational fishermen.

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Jason Domingos

JD Farming Inc.
PO Box 3997
Paso Robles Ca. 93447
(805) 391-3871
Fax (805) 227-4143
www.jdfarming.com

#17

From: **Mike Glick** <wisehart@impulse.net>
Date: Tue, Feb 7, 2017 at 4:40 PM
Subject: More Comments on CDFW Recommendations for the 2017 Salmon Season
To: pmmc.comments@noaa.gov
Cc: Mike.Burner@noaa.gov

I believe that one major flaw in the analysis that forms the basis for the contention in the 2017 CDFW report recommending closure of recreational fishing on June 1 for "Monterey South" while leaving commercial fishing open in June is that the analysis neglects the impact rate (and actual impact i.e. WR fish killed) of **mortality of released short fish** (fish below the respective size limit). That is to say that the impact rate for commercial in June is artificially (and erroneously) low (1:200) while the impact rate for recreational in June is artificially, erroneously, (and by design) high (1:9).

Based on the information that I have been able to receive from the people involved with the analysis and decision making process, if the mortality of released shorts is included, the impact rate for commercial in June is actually 1:21.3 (with 32.9 fish actually killed) while the recreational impact rate in June (for a 24" size limit) is 1:15.2 (6.6 actual fish killed).

To actually make an 'apples to apples' comparison, if the rec size limit were increased to 27" (same as comm) the recreational impact rate drops to 1:27.8 (3.6 actual fish killed).

I recognize that these numbers may be inaccurate due to the inaccuracies and limitations of the data that I have been given but with 'better' data the results may change in magnitude but the relative comparison between commercial and recreational will not significantly change. Therefore, if commercial is left open in June there is no logical reason to close recreational fishing in Monterey South.

Mike Glick

Santa Barbara, Ca

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FISHERY TYPE	IMPACT RATE NEGLECTING MORTALITY PER CDFW REPORT	WR IMPACT NEGLECTING MORTALITY OF RELEASED SHORTS (# OF WR KILLED)	IMPACT RATE INCLUDING MORTALITY (PER NOAA DATA) *	ACTUAL WR IMPACT INCLUDING MORTALITY OF RELEASED SHORTS (# OF WR KILLED)
COMMERCIAL 27" SIZE LIMIT	1 : 200	3.5	1 : 21.3 **	32.9
RECREATIONAL 24" SIZE LIMIT	1 : 9	11.1	1 : 15.2 ***	6.6
RECREATIONAL 27" SIZE LIMIT	1 : 200	0.5	1 : 27.8 ****	3.6

#18

----- Forwarded message -----

From: <richpenney@comcast.net>

Date: Thu, Feb 9, 2017 at 2:17 PM

Subject: 2017 Salmon Season

To: Mike.Burner@noaa.gov, pfmc.comments@noaa.gov

In regards to the consideration of the 2017 Salmon season. As a local recreational fisherman that fishes in the (Monterey South) area, I would like you to consider allowing sport anglers to pursue our two fish limit until June 30th. If for the sake of the resource, the size limit needs to be increased for the sport anglers to 27", that seems fair enough.

As difficult as Salmon are to catch in these waters, the economic benefits of allowing sport anglers a little more time trolling for these fish, understanding the amount of revenue that we infuse into the local marine economy is certainly on par with the commercial boats.

I haven't caught a salmon yet, I just would like some more time to do so...

Thank you,
Richard Penney
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[805 291-2521](tel:8052912521)