

## SALMON HEARING SUMMARY ON MANAGEMENT ALTERNATIVES

Date:	March 27, 2018	Hearing Officer:	Mr. David Crabbe
Location:	Laurel Inn & Conference Center Salinas, CA	NMFS:	Ms. Peggy Mundy
Attendance:	85	Coast Guard:	CDR Jason Brand
Testifying:	23	Salmon Technical Team:	Mr. Alex Letvin
		Council Staff:	Ms. Robin Ehlke
<u>Organizations Represented:</u> Pacific Coast Federation of Fishermen's Association, Golden Gate Fishermen's Association, Anglers Anonymous Central Coast, Fisherman's Association of Moss Landing, Crab Boat Owners Association, Port San Luis Commercial Fishermen's Association.			

### Special Opening Remarks

Mr. David Crabbe provided opening remarks for the hearing. Mr. Alex Letvin of the California Department of Fish and Wildlife (CDFW) provided a powerpoint presentation summarizing the recreational and commercial alternatives.

### Synopsis of Attendance

Of the 85 people in attendance:

- 43 were primarily interested in the commercial troll fishery (no preferred alternative; Alternative 4 supported).
- 34 were primarily interested in the recreational fishery (32 preferred Alternative 1).
- 5 attendees represented ports, processors, or other community interests.

### Synopsis of Testimony

Of the 23 people testifying:

- 14 commented primarily on the commercial troll fishery.
- 9 commented primarily on the recreational fishery.

### Commercial Troll Comments

- Submitted 'Alternative 4': Gives more time for both commercial and sport fisherman. Meets the conservation objectives and minimizes the socio-economic impact. Ask STT for a risk-analysis on fisheries at 122,000 escapement for Sacramento River fall Chinook (SRFC).
  - Support 'Alternative 4' x6 (strong show of hands from audience).
- If a fishery structure is a policy decision and not mandated by law, need to consider the socio-economic impacts of reduced fisheries on families and small businesses.
- NMFS guidance for SRFC of 151K-180K cuts opportunity in a specific area without justification. Under the Fishery Management Plan (FMP), all fishing interests must have

an equitable share in the conservation obligations and harvest opportunity. Need to re-examine the alternatives.

- Monterey area - 15 days of fishing in May is more like 5 days given the weather (x3). Not enough to support fisherman and the families. Few salmon around in May. Want the season to continue into June/July. Not enough opportunity to make a living.
- Reduced salmon opportunity will shift the fleet to other species of fish (black cod, halibut, etc.) which will impact those fisheries and stocks of fish. (x3). Hard to see a future in salmon fishing any of the proposed seasons.
- Support Alt 1. For SF area - move the June time into the end of July to have a continuous fishery.
- Open Rockfish Conservation Area for commercial fishery to 50 fathoms just like the sport fishery (10 more fathoms).
- Need salmon projects in Monterey to mitigate climate and poor river conditions.
- Appreciate the meeting south of San Francisco - well attended by Morro Bay and Port San Luis fishers.
- Do not agree with NMFS' guidance to increase escapement of SRFC because there is no correlation between spawners and recruits; naturally spawners, especially in the Central Valley, do not survive well since mainly hatchery stock, and the real problem is poor water management.
- Can't compete with wineries and agriculture for water for salmon.
- Support Alternative 1 with changes (see written comment).

### **Recreational Comments**

- Salmon fishing is an important ingredient to promote sport fishing. Pt. Arena - Pigeon Pt.: need more spring-time opportunity to fill gap. Effort will shift to other species of fish, and increase the impacts on those fisheries. Need to maintain the infrastructure of the fishery with bait, ice, processors, etc.
- Support Alternative 1:
  - All 3 Alternatives have an economic impact. There is a lot on the line financially for all of us out there. Oceans are healthy, lots of age-2 fish.
  - Monterey area needs more time - weather is bad and stops fishing. Morro Bay can be dangerous. Will have no fishery with Alternatives 2 or 3 given the weather. Small group of fishers compared to areas north. Come down and fish with us.
  - Not sure the Alternatives meet the criteria under National Standard 8. Need to maximize opportunity. Conservation is built into the model. (See written comments PCFFA).
  - Small businesses rely on a substantial sport fishing season to survive.
  - Also support 'Alternative 4' (x4).
- NMFS guidance to increase SRFC spawners does not make sense because it is a habitat issue. The economic impacts on the families directly and indirectly related to the fishing industry will be negative. The longer the season the better. We want a sustainable fishery.
- Consider a tag allocation quota for the sport industry that would result in an extended season and avoid stocks at risk. Tags would give equal opportunity to private and party boats alike. Do this for Monterey south and north.
- Small businesses struggle when fisheries are down - it affects the whole community.

**Other Comments**

- Lots of attention on Delta smelt, need the same for salmon.
- Fishing is bonding experience for families. Importance goes beyond economical.

**Written Statements (Attached)**

- Pacific Coast Federation of Fishermen's Association.
- Captain Robert Gallia/ El Dorado.
- Captain Jim Roberts/ Outerlimits Sport Fishing.
- Jim and Sheila Moser F/V Tradewind.
- Christian Cavanaugh - Charter Captain.
- Duncan MacLean - HMB.

PFMC

03/30/18

David Bitts  
*President*  
Larry Collins  
*Vice-President*  
Lorne Edwards  
*Secretary &  
Treasurer*

## PACIFIC COAST FEDERATION of FISHERMEN'S ASSOCIATIONS



**Please Respond to:**

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March 26, 2018

Noah Oppenheim  
*Executive Director*  
Glen H. Spain  
*Northwest Regional Director*  
Vivian Helliwell  
*Watershed Conservation Director*

**In Memoriam:**

Nathaniel S. Bingham  
Harold C. Christensen  
W.F. "Zeke" Grader, Jr.

☐ **Northwest Office**

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TO: Dr. Peter Dygert  
Anadromous Harvest Management Branch  
NOAA Fisheries West Coast Region, Sustainable Fisheries Division  
Sent electronically to [peter.dygert@noaa.gov](mailto:peter.dygert@noaa.gov)

Dear Dr. Dygert,

This year ocean salmon fisheries off California and Oregon will be managed for and constrained by an elevated escapement goal for Sacramento fall chinook, our bread-and-butter stock, due to the "overfished" state of this run and the need to "rebuild" it. These terms and conditions come from the Sustainable Fisheries Act and must be applied to this year's situation, but I will argue that there is a limit to their applicability to salmon runs and especially to the Sacramento fall run.

First, I wish to express that I agree and understand that it is essential to have escapement goals and to try to meet them. In a year like this, when we are flirting with the bottom end of the range of the Sacramento fall run goal, I believe it is appropriate to aim higher to increase the chances of meeting that minimum. Not too much higher, because several layers of conservatism have already been built in to this year's stock abundance prediction:

1) Not all the jacks reported last year were used to predict this year's abundance. The recreational fishery caught nearly 40% of the jacks that entered the river, but only jacks that survived to attempt to spawn were counted. When the rec fishery consistently caught about 10% of the in-river run it made sense to ignore that component, but its recent surge in catch rate changes that;

2) The regression analysis of age-3 vs. age-2 fish was subjected to autocorrelation, meaning that the line drawn through the scatter plot was pulled down to reflect recent years' over-prediction;

3) The datapoint chosen to represent this year's prediction was halfway from zero to the corrected trendline. I'm told by people whose opinions I respect greatly that this isn't doubly (i.e. excessively) conservative, but I haven't yet understood why not.

**2. Irrelevance of brood size for Central Valley:** Magnuson, the Salmon Framework Plan, PFMC, and PCFFA all assume the importance of robust returns of natural spawners to the Central Valley. PCFFA has been working since before my time to improve the productivity of natural spawners in the Valley, and we will continue to do so I hope. To do otherwise is to concede to the vision of fish without rivers, or, total dependence on hatchery stocks. Which to us is a recipe for imminent extinction, not because hatchery fish are inferior, but because hatchery operations are vulnerable to catastrophic failure from both natural and human causes.

BUT: Thirty or more years ago, CDFG biologist Frank Fisher said, "most fish returning to the Central Valley spawn in gravel, but came from a hatchery." That hasn't changed: with constant fractional marking of hatchery fish, we can see that the percentage of marks in the ocean catch is very close to the fraction marked, indicating minimal contribution of naturally produced fish. And the 2009 NMFS biological opinion on Delta operations said that juveniles leaving the mainstem for the Delta have about 1/3 the survival rate of fish staying in the mainstem; also, according to the BiOp, mortality of juvenile fish crossing Clifton Court Forebay to the pumps ranges from 90 to 99%. Thus, as conditions stand today, the marginal utility of larger numbers of spawners to production of the next generation is limited.

**3. Importance of water management decisions:** The California Departments of Fish & Wildlife and Water Resources, and the Bureau of Reclamation, US Fish & Wildlife Service, and NMFS each have some degree of management responsibility for habitat conditions (flow and temperature, clean water) in the Central Valley. In two recent years flows were allowed to drop to the point that an estimated 95% of the main stem redds were dewatered and the juvenile fish lost. Preventing that catastrophe may have been a challenge; those were dry years. But the agencies failed to meet the challenge, and this is merely the most dramatic recent example of such failure, in spite of a host of laws, regulations, and court decisions requiring better stewardship.

Rebuilding Central Valley salmon stocks will require a higher degree of commitment than we have yet seen from state and federal agencies to follow existing rules and to work together towards a future of robust Central Valley runs. It cannot be done solely on the backs of fishermen; we are willing to help and would be more willing if we saw that kind of commitment from the agencies. Until then, there's only so much we can do.

Sincerely,



Dave Bitts  
President

Cc: Butch Smith  
Brett Kormos  
Mike Burner

STEWARDS OF THE FISHERIES

Robert Gallia / EL dorado

3043 Deseret drive

Richmond Ca, 94803

Meeting notes.

I first would like to thank the commission and all the members for giving me the opportunity to speak in support of option #1.

I have been operating a Commercial Passenger Fishing Vessel from the Berkeley Marina since 1987, during my time as a Coast Guard licensed Operator, I have always been able to promote alternative fisheries, when the Salmon fishing was slow, or weather affected our ability to go offshore.

But the Salmon fishery was open and was always the first choice. Most of my career has been geared toward salmon fishing. Having a closed spring salmon fishery, will deter most of the interest in my business is salmon first.

The salmon fishing has always been the foundation of the Central Coast Charter boat fleet. By delaying the 2018 salmon season, you will shift the impact directly to the struggling striped bass and recovering halibut bay fisheries.

The San Francisco Charter boat fleet has always strived to provide safe, quality and reliable sport fishing trips to all the youth and licensed anglers of this state. Over the years, we have always been able to provide these trips providing we have time on the water.

Without the time on the water, the CPFV cannot continue to afford the premium located berths, which include public parking, bathrooms and if you're fortunate, a Bait and tackle shop.

Every year the Coast Guard requires all Inspected vessels to meet increased Safety and Security measures that guarantee public safety during our hours of our operations.

These new safety and security measures required by the local CG authority require our industry to institute more safety measures, and we comply with less money. **Even if the boat is not operating.**

The CPFV Commercial Passenger Fishing Vessel will be financially impacted far greater than any other entity in this industry. Due to the elevated cost of maintaining these operations.

During 2016, I applied for a State Air Quality emission grant, which provided for partial funding for the replacement of engines which had 19,000 hours of use.

After a 2 year lengthy process the State air quality board granted the funding in February of 2018.

My decision to go forward with this project was based on the information providing us with similar time on the water as the 2017 season.

In hindsight, I wish I had waited to go forward with this repower project, until next year.

The amount of money that I will spent will exceed \$30,000 may be as much as 40,000. I have started pulling some equity from my home to provide for this terrible uninspected financial hardship created from this delay of the season.

I am not the only person that been effected by the decision to delay the season,

Everybody in this room has their own story, I am just fortunate enough to have the opportunity and courage to share my personal hardship in this forum..

I hope you will consider Option #1.

Capt Robert Gallia / EL Dorado



## OUTERLIMITS

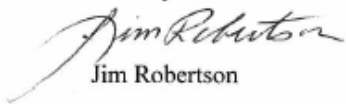
*Captain Jim Robertson*  
50 Briarwood Dr San Rafael, Ca 94901  
(415) 454-3191

March 27, 2018

Pacific Fishery Management Council

My name is Jim Robertson from the Golden Gate Fishermen's Association and owner Outer Limits Sport Fishing. I urge you to vote for the option one proposals for the area of Point Arena to the Mexico Border. All three options will have a dramatic economic impact on the Charter boat industry, but option one will help to keep the charter boat fishing fleet from the continual spiral downward. The abundance of small salmon and two year old salmon in the ocean last year is something we have not seen in many years. The Auklets showing up early on the Farallon Islands and having a second brood, show that the ocean conditions are healthy. I feel the number of 3 year old salmon returning is going to be a lot higher than your calculations show.

Thank you



Jim Robertson



**From:** Jim Moser  
**Sent:** Monday, March 26, 2018 7:30 AM  
**To:** pfmc.comments@noaa.gov  
**Subject:** 2018 commercial salmon season OPTION 4,

To whom it concerns,

As a commercial Salmon Fisherman for the last 45 years operating out of Santa Cruz and Moss Landing but traveling up and down the coast to find the fish in any given time or season available to me I see options 1, 2 or 3 presented to us as a financial disaster . I don't mind traveling but thinking of relocating up to the KMZ to just day fish for a daily limit for maybe a few days each month is not productive. Our local communities and business's need our fishermen producing during the time when fish are in local waters , not at the end of the season when typically the fish have migrated out of the area. Last year there was an abundance of small fish in the ocean up and down the California coast that should be legal harvestable fish this year. Saving all these fish to die in a compromised river system is ludicrous .

If your job is to save the Salmon, then please use your power to keep water in our rivers and promote better smolt release options that have proven to be effective at increasing survival rate. Hooks are not the problem, it's the water and hatchery management that you need to address . This proposed season could be the end of many small business operators and the support business's that survive from them. Please think about giving us some time and area that might be productive, these fish are elusive and the ocean is large .It is expensive to outfit to go fishing, so fishing for a few days, or weeks off and on, is costly for people trying to make a living doing this .

There is an option 4 that is being proposed that I totally support, it would at least give us a chance to make a living. We always have the weather to contend with and the moods of the fish, as you might not know the fish are moody and we are using a few barbless hooks in a large ocean, its not like we are sitting in front of the river with gillnets trying to catch everything in the water, they have a choice to bite our hooks so I am sure plenty will survive to fulfill the hatcheries needs. No sense in letting tons of fish die in hot river beds. Fix the water first, don't kill the industry.

Thanks for your consideration,  
Jim and Sheila Moser F/V Tradewind Santa Cruz, Ca  
Sent from [Mail](#) for Windows 10



Handwritten signature of Jim Moser, appearing as 'Jim Moser' in cursive script.

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Christian Cavanaugh

Dear counsel,

Thank you for giving me the opportunity to speak today. I am a charter boat operator out of Sausalito, CA. I've been deckhanding on the charter boats in the area since I was 12, almost 20 years. After years of saving, I launched my own charter business in 2017. My experience last year was surprisingly successful. I credit my success to the abundance of salmon along our coastline. We had continuous days of limit style fishing. The most exciting part for me, and the other Bay Area captains was seeing the 1-2 year old, 10lbs class fish. Because of that there was continues buzz and excitement about the 2018 salmon season. Without a doubt, 2017 was the healthiest most productive salmon season we have had in over a decade. But despite a good year, the boat payments continue. Not only did I invest money into the fishery, I recently bought my first home 3 months ago and my wife and I are expecting our first child in a month. With so much on the line, I need the opportunity to work and I feel strongly that we are not putting future seasons at risk by doing so. As a result, I would like to see option 1 come to fruition. Anything less than option 1 would put my livelihood at stake. Once again, thanks for listening and I hope my opinion and experience can help influence this outcome.



It is widely recognized that the fisheries have little to do with the decline of salmon population, yet NMFS continually requires the council to ratchet back fishing opportunity while allowing those responsible for the decline to continue business as usual. Before Shasta Dam became an impassable barrier a plan to replace the portion of the salmon resource that was lost due to habitat that was no longer available, was to be developed. Coleman National Fish Hatchery while having been upgraded to mitigate the losses due to the construction of Shasta Dam has never produced anywhere near the amount of fish that was decided as reasonable by the Dept of Interiors own scientific review team. There was all kinds of hokas pokas surrounding their determinations such as : Using one years spawner counts for the determinations (28000) even though in subsequent years the review team stated the counts were observed as being double (60000) of what was originally observed. If you want to do the math they considered the escapement at a 1 to 1 male, female ratio and 7000 eggs per female. Those counts, taken at Anderson, Cottonwood diversion dont quite jive with the fact that there was an up river gill net fishery that yielded as much as 12 million pounds of salmon in a given year.

Also there has been alot of time and effort put into the salmon mortality caused by the pumping activity in tracy, but those losses have not been mitigated for. Even the CVPIA calls for a doubling of the salmon populations but we have yet to see the salvage plan associated with either of those issues. It was our ignorance and arrogance that led us to believe that all we had to do was introduce the salmon to habitat they had rejected over time and they would thrive as they had in their pre dam habitats. Needless to say it didnt quite work out that way so the mitigation responsibility established back in the 1940's, as short sighted as it was, has not diminished in any way. In fact, when Interior published its special reports on the original salvage plans they had yet to realize there was a winter run in the Sacramento system. We have obviously made great strides regarding salmon propagation and salmon life history since then. Unfortunately every step forward we take is proceeded by two steps back. While there seems to be a contingent of thought that hatcheries have the potential of weakening the gene pool of salmon, in as little as a couple of years it might be helpful to keep in mind that the first hatchery in California was built in 1870. Ironically, it was not built for mitigation, it was built primarily to gather eggs to use to repopulate the Atlantic Salmon habitats world wide. Regardless of which side of the hatchery arguement you subscribe to if you look closely at it the arguements, it appears the problems center more on practices than principles, so our infinite arrogance should be overcomable. We have seen the benefits something as simple as a change in release timing and release location can make. It seems to be more widely recognized that the biggest hurdle to overcome in the central valley is getting the fish to the ocean and getting the Fish and wildlife service to produce the amount of fish that was established as the reasonable

mitigation amounts back in the early 1940's. I don't see any verbiage in any of the documents regarding the Shasta salvage plans that the mitigation amounts were negotiable yet Coleman has creatively reduced what they are supposed to be raising from, depending on which counts you go by, 210 million or

98 million to a mere 12 million fish annually. I won't get into the particulars on winter run or spring run right now, suffice to say their early attempts failed so they just gave up on them. And we know from their own studies that in two separate years of radio tagging that 97% and 94% of their study releases didn't make it to the Golden Gate Bridge so I guess the philosophy is "why bother". Now to bring all of this full circle I am wondering why NMFS

doesn't go after the DOI for not fulfilling their public trust mitigation responsibilities as they relate to Shasta Dam. I seriously doubt that we would be facing an overfishing designation right now if they had. And just a suggestion, throw in a building and equipment to process carcasses into fish pellets to supply themselves and other federal hatcheries.

And speaking of NMFS I would like to hear why last year's guidance on the Salmon fisheries clearly created a reallocation of the resource to the recreational fishery and their guidance, or lack of, stands to do the same this year without a plan amendment allowing them to do that. As I understand the council process it was designed to avoid this kind of confusion. Also the guidance letter that they presented only specifically addressed winter run and Klamath escapements so the Salmon

Advisors should be developing seasons based on those two parameters instead of trying to guess on what escapements on the Sacramento will be acceptable. As it is right now developing a season structure is sort of like throwing a bunch of crap against the wall and seeing what sticks. So in keeping with the NMFS guidance, and having seen last year the amount of two year olds in the ocean from the Columbia River to the Gulf of the Farallones,

recognizing that the San Joaquin was removed from the Central Valley index creating the Sacramento index without adjusting the escapement range I offer as follows. The focus of this option is to have a fishery being conducted elsewhere while the quota fisheries in the zone are being prosecuted so as to relieve pressure on them and hopefully extend them so the information gathered is spread out over a longer period.

Based on Option I

June, July, and August Zone quota fisheries at 3,000 fish each with rollover June and July from Arena to Pigeon Pt 10 days open each month  
ratchet back August in Fort Bragg to fit winter run and Klamath

parameters

All other considerations in Opt I remain the same

If this season structure creates some discomfort for the managers a risk assessment should be conducted by the team to determine its viability.

Respectfully submitted,  
Duncan MacLean