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April 4, 2023

Mark Gorelnik, Chair
 Pacific Fishery Management Council
 7700 NE Ambassador Place #101
 Portland, OR 97220

Subject: Comment on Agenda Item E.5, Sacramento and Klamath River Fall Chinook Conservation Objectives Scoping

Dear Chair Gorelnik and members of the Council:

I write you today on behalf of the California Fish and Game Commission and thank you for the opportunity to provide comment on the subject agenda item. Together with the California Department of Fish and Wildlife (Department), the Commission has been engaged in a wide portfolio of salmon issues, including species in the Sacramento and Klamath rivers basins, about which we write today. The Commission has cooperatively managed these iconic fish in the face of unprecedented complications.

For decades, California salmon populations have undergone a series of challenges that have resulted in substantial declines, from wildfire and chronic drought to pollutants, migration barriers, and now emergent thiamine deficiencies. Salmon management presents complex threats that require innovative management strategies. We offer some suggestions for the Council to help address some of these many challenges.

In-Season Conservation Measures

The Commission urges the Council to support the Department's proposed pre-season and in-season measures for commercial and recreational salmon harvesters. As you know, the spawning success of declining in-river populations is intimately linked with ocean conditions and harvests. Commercial ocean harvests have consistently exceeded projections, complicating management efforts and limiting escapement numbers. The Department's proposal to limit commercial and recreational harvest to the projections would be an important step in increasing the likelihood that escapement numbers reach levels that are sufficient to ensure adequate spawning.

Sacramento River Assessments

The Commission encourages the Council to proceed with reviewing conservation objectives for Sacramento fall-run Chinook salmon. Candidly, the current conservation objectives do not

adequately reflect today's ocean conditions, the Sacramento-San Joaquin Delta system, nor the state of readily available habitat. A comprehensive evaluation, which includes an open, realistic assessment of escapement goals, will be critical to ensuring accurate and effective management decisions going forward, given today's real-world conditions.

Current escapement modeling and reporting, as well as using a single index to estimate adult Sacramento River fall-run Chinook salmon abundance, fail to clearly identify and protect fish in individual basins within the Sacramento and San Joaquin rivers watersheds that may be suffering from poor natural recruitment and low escapement, while other basins supported by hatcheries have stronger escapements. We encourage the Council to evaluate if taking finer scale escapement targets would be beneficial for recruitment and escapement in the long-term.

Klamath River Basin Objectives

Removing four Klamath River dams is likely to further change the basin system over the long-term; the effects of this change, possibly the largest riverine restoration project in recent history, are as yet unknown. We suggest the Council acknowledge that interim measures, guided by current science and policy, are needed to manage Klamath fall-run Chinook salmon in the face of this dramatic change until conditions settle, and will require focused attention by a group of experts over the near-term. Embarking on a re-evaluation of the conservation objectives for the Klamath River Basin system once the effects of the dam removals come into sharper relief is realistically on an eight- to ten-year time frame.

Modeling Framework

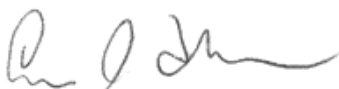
The Commission understands there has been considerable discussion regarding the models used to predict Sacramento River escapements and commercial and recreational fishery harvests and impacts. Certainly, the current models have variability in results, sometimes widely off the mark and at other times relatively close to the observed escapement and predicted ocean harvest. We encourage ongoing scrutiny of the models to best reflect how real-world biological and environmental factors shape ocean fisheries and escapement numbers.

Conclusion

The Council's recommendations form the foundation upon which the Commission's regulatory decisions are built. The Commission looks forward to working with the Council on the difficulties facing California's salmon populations and stands ready to engage with the Council in whatever way would be most productive to promote the interests of salmon conservation.

If you have any questions, please contact Commission Wildlife Advisor Ari Cornman at ari.cornman@fgc.ca.gov or (916) 653-4899.

Sincerely,



Eric Sklar
President

Chair Mark Gorelnik

April 4, 2023

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cc: Wade Crowfoot, Secretary, California Natural Resources Agency
California Department of Fish and Wildlife
Charlton Bonham, Director
Chad Dibble, Deputy Director, Wildlife and Fisheries Division
Jay Rowan, Branch Chief, Fisheries Branch
Craig Shuman, Regional Manager, Marine Region
Merrick Burden, Executive Director, Pacific Fishery Management Council