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May 18, 2011

Mark Cedergreen, Chairman
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Board of Commissioners:

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Roy Davis

Vice Chairman
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Secretary/Treasurer
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Board Members
Kathy Lindley Hall
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Dear Chairman Cedergreen,

The Port of Brookings Harbor appreciates the opportunity to comment on the Draft Environmental Assessment for the Pacific Coast Salmon Plan Amendment 16.

We understand the rationale for the new requirements to end and prevent overfishing through the use of annual catch limits and accountability measures contained in the Magnuson-Stevens Act (MSA), 2006 reauthorization. The 2006 reauthorization also required the establishment of acceptable biological catch levels. These requirements appear to be intended to establish a management framework that is biologically based and supported by scientifically sound principals. We support these requirements for fish stocks that have not been historically managed and regulated by an approved Management Plan or where those requirements have not been in place.

In the case of Pacific Coast Salmon however, we have been successfully managing extremely diverse, complex and widely distributed salmon stocks with a proven Salmon Fishery Management Plan (FMP) that has been in place since 1977. Various amendments have been added to address management refinements and new technology. In our view, this document is an example of what the new requirements of MSA are designed to do for all regulated fish stocks. We feel that the new requirements are already included in the existing FMP in the form of conservation objectives, ocean harvest limitations and harvest alternatives modeled to meet specific goals. Because the current FMP has been continually updated to include new science and ESA requirements and because the results of the required management actions have been evaluated annually, we feel the current FMP is the best available science for management of Pacific Coast Salmon. Accordingly, the existing FMP satisfies all of the MSA National Standards. In addition, the requirements, process and results are well understood by the affected communities and the social and economic realities are also clear to those who depend on this fishery.

The Port of Brookings Harbor has a long history of involvement in salmon issues. We support sustainable fisheries and recognize the importance of our commercial, tribal, and recreational salmon fisheries. The Salmon fishery and its related employment is essential to our economy.

In conclusion, we request that the Council choose the Status Quo option and thereby allow the current FMP to continue to be the guiding document for Pacific Coast Salmon. The science of managing salmon harvest is very advanced when compared to most groundfish and pelagic species and we are convinced that existing management framework mirrors the intent of the MSA 2006 reauthorization requirements.

Sincerely,

Roy C. Davis
Chairman
Board of Commissioners
Port of Brookings Harbor

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