

KLAMATH MANAGEMENT ZONE FISHERIES COALITION
P.O. Box 1521 · Gold Beach, OR · 97444

October 7, 2010

Mr. Mark Cedargreen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 111
Portland, OR 97220-1384

Dear Mr. Cedargreen:

I am writing on behalf of ocean sport and commercial salmon fishermen, mostly in the Klamath Management Zone but also from Point Sur to Cape Lookout, whose fishing opportunity is driven by the allowable ocean catch of Klamath Fall Chinook salmon. As you know, that opportunity has been progressively curtailed for the past thirty years to, the point that now we are lucky in some years to have any open fishing days at all.

We understand that, under Amendment 16 to the Salmon framework Management Plan, the Pacific Fishery Management Council (PFMC) is contemplating increasing the minimum sustainable yield (MSY) number of 40,700 in order to comply with the most recent version of the Sustainable Fisheries Act. We strongly urge the Council to not adopt this change. Three technical reviews of the current methodology have all supported use of the 35,000 natural spawner floor. We believe the current harvest rate management plan is sound and ask that you retain it.

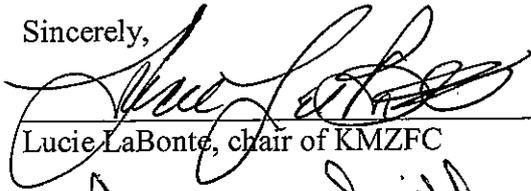
We note that, under harvest rate management, Klamath fall natural escapement has bracketed MSY, falling below 13 times and above 14 times. Average escapement has been well above MSY.

First, raising the target by 5000 natural spawners means reducing the allowable Klamath catch by that much plus the additional 3000 to 5000 hatchery fish associated with those natural spawners. Second, in ocean fisheries we use our relatively scarce number of available Klamath fish to access the (normally) far more abundant Sacramento fall Chinook stocks, so that each Klamath fish "saved" for spawning means a reduction in total ocean catch of from ten to 50 fish. At best, a reduction of eight to 10,000 available Klamath fish translates to about a 100,000 reduction in ocean landings; in lean years it will mean the difference between worthwhile fisheries and none at all.

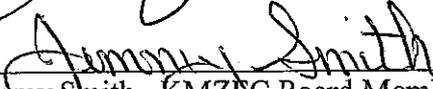
We understand and support the need to manage fisheries to ensure the robust survival of future generations. We believe the current method does that (to the extent that constraining fisheries to deal with habitat-generated issues can do it). But we do not understand and cannot support constraints to fisheries which have no demonstrable benefit to the health of the resource. We believe the proposed change to a target of 40,700 would seriously damage the remaining ocean salmon fisheries while offering only paper benefits.

We look forward to our work together and thank you in advance for considering our comments.

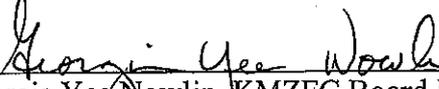
Sincerely,



Lucie LaBonte, chair of KMZFC



Jimmy Smith, KMZFC Board Member, 1st District
Supervisor, County of Humbolt



Georgia Yee Nowlin, KMZFC Board Member,
Curry County Commissioner