

**Curry County
Board of Commissioners**

Bill Waddle, *Chair*
Georgia Yee Nowlin, *Vice Chair*
George Rhodes, *Commissioner*

Agenda Item F.2.c
Supplemental Public Comment 2
November 2010

94235 Moore Street/P.O. Box 746
Gold Beach, OR 97444
541-247-3296, 541-247-2718 Fax
800-243-1996 www.co.curry.or.us

October 13, 2010

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

RECEIVED

OCT 13 2010

PFMC

Dear Mr. Cedargreen:

We, the Curry County Board of Commissioners, are writing on behalf of the ocean sport and commercial salmon fishermen in Curry County. As part of the Klamath Management Zone, fishing opportunity is driven by the allowable ocean catch of Klamath Fall Chinook salmon. That opportunity has been progressively curtailed for the past thirty years so that in some years we are fortunate to have any open fishing days at all.

Now, we understand that the Pacific Fishery Management Council (PFMC) is contemplating increasing the minimum sustainable yield (MSY) number to 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.


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.

Thank you for considering our comments.

Sincerely,

Absent
Bill Waddle
Chair


Georgia Yee Nowlin
Vice Chair


George Rhodes
Commissioner

HUMBOLDT AREA SALTWATER ANGLERS, INC.

October 13, 2010

Mr. David Ortmann, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RECEIVED
OCT 13 2010
PFMC

Dear Sir:

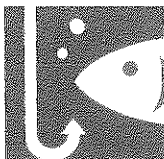
The members of the Humboldt Area Saltwater Anglers (HASA) are aware that the Pacific Fisheries management Council will be considering a new fishery management plan (FMP) for salmon at the Council's November 2010 meeting in Costa Mesa. As we understand it, this new FMP is intended to align the salmon annual catch limits (ACL) with the requirements of the Magnuson Stevens Act (MSA).

We understand the Salmon Technical Team (STT) has recommended that escapement for Klamath River should be set at the maximum sustained yield (MSY) for that river of 40,700 natural Chinook spawners (KRFC). While we concur that the use of MSY is appropriate when managing the Klamath Fall Chinook during periods when the river is considered "Over Fished", we firmly believe that the escapement in other periods should remain at the conservation objective of 35,000 KRFC. An escapement of 35,000 KRFC is sufficient to satisfy the needs of the hatcheries on both the Klamath and Trinity rivers. This level also allows a reasonable number of fish for the ocean salmon, river recreational salmon and tribal salmon fisheries. Raising the escapement to the 40,700 on a permanent basis would deal a severe economic blow to the region. Many businesses rely upon the income derived from all three fisheries during the summer and fall fishing seasons. Additionally, establishing a minimum level at 40,700 will potentially overpopulate the available natural spawning capability of both rivers. It would also cause the PFMC to consider raising the escapement floor to an unattainable number should the river be considered "Over Fished" with an annual escapement floor of 40,700.

HASA is requesting that the PFMC continue to use the escapement for of 35,000 (the conservation objective) as opposed to the MSY of 40,700 for the management of KRFC.

Sincerely,

Tim Klassen
President



P.O. BOX 6191
EUREKA, CA. 95502

E-MAIL hasa6191@gmail.com

WEB SITE www.humboldtuna.com

David Bitts
President
Larry Collins
Vice-President
Duncan MacLean
Secretary
Mike Stiller
Treasurer

PACIFIC COAST FEDERATION of FISHERMEN'S ASSOCIATIONS



W.F. "Zeke" Grader, Jr.
Executive Director
Glen H. Spain
Northwest Regional Director
Vivian Helliwell
Watershed Conservation Director
In Memoriam:
Nathaniel S. Bingham
Harold C. Christensen

Please Respond to:

California Office

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Fax: (415) 561-5464

www.pcffa.org

Northwest Office

P.O. Box 11170
Eugene, OR 97440-3370
Tel: (541) 689-2000
Fax: (541) 689-2500

25 October 2010

Dr. Donald McIsaac, Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Amendment 16 to the PFMC Salmon Fishery Management Plan
November Agenda Item F.2a

Dear Doctor McIsaac and Members of the Pacific Council:

The Pacific Coast Federation of Fishermen's Associations (PCFFA), representing working men and women in the West Coast commercial fishing fleet, including many organized salmon trollers, has reviewed the proposed Amendment 16 to your salmon fishery management plan (FMP) as it relates to an Annual Catch Limit (ACL).

The document, in its current form is horribly confused, and PCFFA respectfully asks that all efforts be made to create a clear and easy to follow document that plainly states each option under consideration, what it entails and what the expected affects will be on fish conservation and fishing. This is important to ensure you understand and the public understands the choices before the Council in selecting an ACL for the salmon fishery. PCFFA is not opposing a change from the status quo in establishing a salmon ACL, but it is extremely nervous about changes that would allow more fishing than status quo at low stock levels and equally nervous about changes that might restrict fishing from current levels at higher stock sizes. Our preference, in other words, would be to err on the side of conservation at predicted low stock levels, while favoring much higher fishing opportunity when stock levels are large.

If you have any questions, please do not hesitate to contact us. PCFFA's representatives look forward to working with the Council and its staff on the development of an acceptable ACL for the salmon fishery.

Sincerely,

W.F. "Zeke" Grader, Jr.
Executive Director

STEWARDS OF THE FISHERIES

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

October 7, 2010

RECEIVED

OCT 21 2010

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

PFMC

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.

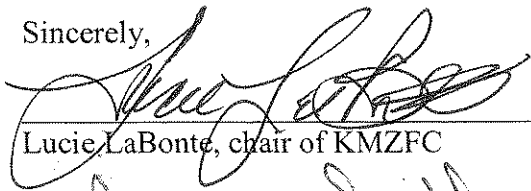
We note that, under harvest rate management, Klamath fall natural escapement has bracketed MSY, falling below 13 times and above 14 times. Average escapement has been well above MSY.

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.

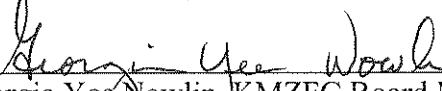
Sincerely,



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