

Statement by Kent Martin, SAS Panel member

After sitting in on the various meetings to try to determine how to craft upcoming fishing seasons I would like to suggest using a different process than the “annual guidance letter from NMFS” approach.

I have been particularly struck by the modeling error found re LCR tule fall Chinook, and the apparent struggle to figure out how to adapt to this situation. It seems to me that any reasonable process should be able to deal with errors as a matter of course, and that the term “guidance” does not suggest that the letter is carved in stone or made of quick-drying cement. Rather, it should confer flexibility.

In addition, if the letter is indeed unchangeable, what does that say about the efficacy of any public comment? It makes irrelevant any meaningful public comment or review, even, in this case, when a modeling error has been made that the agency is aware of.

Because the letter is done at the beginning of the season-setting process, it also forestalls dealing with year-to-year variability of salmon populations in different locales. For example, last year’s letter proposed dropping the fall Chinook exploitation rate over the next couple of years, without the benefit of what we now know about this year’s abundance. Moreover, it does not reflect very much confidence in the salmon recovery programs well under way in many locales that should be contributing to increased abundance.

I’ve been in the salmon fishing business for fifty years. Each year is a surprise. No year is precisely the same as another. The salmon guidance letter process, by contrast, is an opaque process that is not readily adaptable to changing conditions. I’d be grateful for your consideration of opening this process to be more publicly accessible. Thank you.