



## Coastside Fishing Club

P.O. Box 5928, Napa, CA 94581

27 March 2015

To: Dorothy Loman, Chair, Pacific Fishery Management Council

Subj: California Recreational Salmon Season for 2015

The Coastside Fishing Club supports a California recreational salmon season that provides for ample fishing opportunities this year, while recognizing that the continued California drought is stressing to the fish, and is putting future fishing at risk.

Of particular concern is the Sacramento winter-run Chinook. As reported at the 2015 March Council meeting during the NMFS report – agenda item F1a in Supplemental Attachment 2, “Reconsideration of the Sacramento River Winter Chinook Harvest Control Rule:”

*The drought conditions are pervasive and a topic of intense study. NMFS is aware of recent reports indicating that rearing and out-migration conditions for Sacramento winter-run were poor in 2014-2015 and that juvenile survival rates were as low as 5% for progeny of naturally spawning fish. The life-history of winter-run is such that the fishery occurs almost exclusively on three-year-old fish. The 2014-2015 out-migrants will contribute to fisheries in 2016....*

*The immediate concern is our collective need to plan for ocean fisheries in 2015.... Absent a signal to the contrary related to juvenile survival NMFS concludes that it is appropriate to continue to rely on the existing control rule for planning 2015 ocean fisheries. Ironically this suggests that there will be a modest increase in harvest opportunity in 2015 compared to 2014 notwithstanding our substantive concerns related to what we may face in 2016.*

While this year’s projections suggest that sufficient winter-run adults are currently in the ocean to enable normal fishing opportunities, it is also apparent that the out-migrating naturally spawned 2014 brood year was severely impacted. The failure of the 2014 brood year is entirely attributable to longstanding water quality and quantity issues associated with their inland habitat. Loss of temperature control on the Sacramento, along with dewatering of redds, and excessive diversion of water essentially destroyed the naturally spawning component of this brood year. However, as dire as the loss of the 2014 winter-run brood year is, curtailing the 2015 fishing season can be of no help that to that brood year. That is, these fish will remain too small during the 2015 fishing season to be contacted by fishing operations targeting the abundant fall run Chinook that are projected in the ocean this year.

And while there is essentially nothing that the fishermen can do this year to directly address the loss of the 2014 brood year, we can take positive action to help jumpstart the recovery of this run. Although the current projection of adult winter-run Chinook would allow for impact rates as high as 19%, we understand that this is a maximum cap consistent with ESA requirements. In light of the severity of the continued drought and the need to provide for future fishing opportunities, we



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support structuring the season to lower the impact rate on the adult winter-run fish in order to return more potential spawners this year than would normally be the case.

But curtailing fishing opportunities this year to provide for the return of more adult spawners, will be a meaningless gesture unless the federal and state water managers take immediate and dramatic action to provide suitable spawning habitat when they return, and to enable the resulting brood year to successfully out-migrate to the ocean. We want our actions to be noted and acted on. The fishermen did not cause this problem, but we will be carrying the burden to correct it. The water management policies of the state and federal programs must change to give the fish a chance to survive as a first priority. Without that change, they (and our fishery) are lost forever.

Specifically we support a recreational fishing season for California that is a modification of Alternative II, by extending the 24-inch size limit in the Monterey Area through the month of June. This should reduce the winter-run adult exploitation rate to 17.2%, which is well below the NMFS allowable 19%, and even below the State's conservation objective of 17.9%. We are opposed to the late season closures in Alternative III, since they will have much less conservation benefit to adult winter-run fish, and be of no measurable conservation benefit to the sub-adult 2014 brood year; but would however eliminate some of the best recreational fishing opportunities of the year. These late season months offer some of the nicest weather, and are extremely valued by the Charter and private boat fishermen.

Thank you,

Dan Wolford, president  
Coastside Fishing Club

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