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Portland, Oregon
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Pacific Fishery Management Council
Oral Testimony
Salmon Management
Agenda Item E.1.a (NMFS Regulatory Activities)

Chair and Council members:

My name is Brian McLachlan, I live in Portland, Oregon, and I fish primarily out of the Port of Garibaldi, Oregon.

Thank you for the opportunity to provide comments regarding recent regulatory actions by the National Marine Fisheries Service (NMFS).

On March 10, NMFS, in consultation with the Council and the states of California and Oregon, closed commercial and recreational salmon fisheries south of Cape Falcon though at least May 15. NMFS took this action due to the need to conserve impacts on Klamath River fall Chinook (KRFC) and Sacramento River fall Chinook (SRFC).

One of the fisheries closed was the recreational fishery from Cape Falcon to Humbug Mountain, which was scheduled to open March 15. I personally participate in this fishery.

I recognize that low abundance forecasts this year for both Klamath and Sacramento fall Chinook warrant extraordinary measures. And I don't mean to be insensitive to the extremely harsh realities, both social and economic, of no salmon fishing at all for commercial fishers south of Cape Falcon, and for recreational anglers in California.

Yet, I am disappointed that NMFS decided to close down the spring Falcon to Humbug recreational fishery because my understanding is that expected impacts to Klamath and Sacramento fall Chinook in this area during this period are miniscule and would likely have no material impact on achievement of applicable conservation objectives.

My reading of Preseason Report II, Tables A-2 and A-4, indicate the conservation benefit of closing the Falcon to Humbug area to recreational salmon angling from March 15 to May 15 amounts to an estimated savings of seven KRFC, and no more than 13 SRFC.

With a Klamath abundance estimate of over 100,000, that amounts to an exploitation rate impact savings of seven thousandths of one percent. For Sacramento fall Chinook, with an abundance estimate of over 169,000, the exploitation rate savings amounts to eight thousandths of one percent. Even if the Sacramento abundance estimate was buffered by 40% to account for recent over-forecasts, the expected impacts would be only around one point three hundredths of one percent.

I don't understand how these miniscule impacts provide a rational biological basis to close, for two months, 215 miles of the Oregon Coast encompassing the ports of Garibaldi, Pacific City, Depoe Bay, Newport, Winchester Bay, and Coos Bay.

Angler effort for salmon in this area during the spring is very modest and our catch numbers are low – measured in the hundreds of fish, not thousands. But it's still disappointing to lose recreational opportunity where the impacts are so very minimal and closing the fishery doesn't seem required to meet the conservation objectives.

Based on these figures, I am left with the impression that the decision to shut down the Falcon to Humbug area to recreational salmon angling this spring is more about optics than actual conservation need.

But if my impression is mistaken – if my understanding of the expected impacts, abundance estimates, or allowable exploitation rates are off base, then I invite NMFS to explain in detail with reference to these figures, why shutting down specifically the Falcon to Humbug fishery was needed to meet conservation objectives.

Finally, if the Council intends to recommend, or if NMFS and the Council are, for practical purposes developing management measures designed to satisfy lower allowable exploitation rates than those prescribed in the control rules, Preseason Report II should have clearly indicated this to provide notice and allow stakeholders to comment on any such modifications to the applicable conservation objectives.

Thank you for considering my comments.