



## Coastal Conservation Association

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March 29, 2024

Electronically submitted via the Council's e-Portal - <https://pfmc.psmfc.org>

### **RE: 2024 Ocean Salmon Fisheries**

Mr. Marc Gorelnik,

CCA Washington supports efforts to provide robust and meaningful fisheries. However, we believe more must be done to implement harvest reductions and reforms in numerous non-selective commercial salmon fisheries to protect weak and ESA-listed Pacific salmon populations. The continued failure to fully embrace mark-selective harvest reforms also puts both hatchery production and responsible, sustainable fisheries at risk of litigation based on federal requirements related to the proportion of hatchery origin spawners (pHOS) for ESA-listed salmon populations.

In a [2023 letter](#) to NOAA Fisheries, the Lower Columbia Fish Recovery Board expressed similar concerns. The letter included important recommendations, including managing fisheries “in a manner that further enhances salmon recovery prospects and natural origin fish escapement” and “reducing harvest of Chinook salmon in ocean fisheries to support salmon abundance.”

A tremendous number of salmon are harvested annually in ocean commercial fisheries extending from the Bering Sea to California. As part of the process to determine the 2024 ocean salmon fisheries, we urge NOAA and the Pacific Fisheries Management Council (PFMC) to use this opportunity to institute much needed harvest reform by 1) reducing the number of wild and ESA-listed Pacific salmon harvested in ocean fisheries; and 2) transitioning to more mark-selective fisheries so we can better ensure the protection and perpetuation of all wild salmon.

### **Reduce Commercial Ocean Fisheries**

There is increasing compelling evidence that ocean harvest of Chinook salmon is obstructing any chance of recovery of those stocks. Commercial fisheries off the west coast of North America have substantially altered the age composition of Chinook salmon. This fact was first established in a peer reviewed paper by W.E. Ricker in 1980. The decrease in age and size of chinook has continued unabated in the last 40 years since Ricker published his findings.

A study published on July 28, 2023 in the journal PLOS One found that despite spending over \$9 billion on restoration projects over the past 40 years, wild Columbia River salmon populations continue to decline. While the study raises questions about the efficacy of some of these programs, it also highlights how our current approach to managing harvest does not provide for sufficient escapement of wild salmon populations.

### **Mark Selective Fisheries**

Given recent technological advances, we must find ways to allow more wild salmon to return to their natal rivers to spawn through commercial harvest reductions and selective harvest reforms. This is the best way to leverage the billions spent on habitat restoration and make greater progress towards recovering wild salmon populations while maintaining fisheries and hatchery production. Without action, federal and state fisheries managers subject many hatchery programs to potential lawsuits. In fact, a threatened lawsuit could impact the large Mitchell Act hatchery mitigation program in the Columbia River.

While fishery managers in the U.S. have been largely silent, Canadian officials have called for reform. In 2021, Canada's Department of Fisheries and Oceans (DFO) [announced](#) a nearly 60 percent reduction to commercial salmon fisheries in British Columbia as "an initial step towards longer-term reductions in fishing pressure on stocks of conservation concern." DFO has also signaled a desire to see a "shift to more selective fishing gear" since "larger commercial fisheries cannot selectively fish for abundant stocks without potentially catching at-risk stocks." We agree with this approach and rationale of the DFO and encourage NOAA to embrace this same path forward. Commercial fisheries that are unable to effectively utilize mark-selective fishing techniques should be phased out.

As NOAA and PFMC determine the 2024 ocean salmon fisheries, we believe they should also analyze needed harvest reforms that allow for greater escapement of wild salmon populations and prioritize nearshore and inland fisheries, where we have a better understanding of the impacts that harvest has on geographically unique salmon stocks.

Sincerely,



Nello Picinich, Executive Director  
CCA Washington