



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
7600 Sand Point Way N. E., Bldg. 1  
Seattle, WA 98115

March 26, 2013

*Steve Williams*  
Steve Williams, Assistant Administrator  
Oregon Department of Fish and Wildlife  
3406 Cherry Avenue N.E.  
Salem, Oregon 97303-4924

**RECEIVED**

APR 01 2013

*Guy Norman*  
Guy Norman, Regional Director  
Washington Department of Fish and Wildlife  
2108 Grand Boulevard  
Vancouver, Washington 98661

**PFMC**

Dear Sirs:

As you know, based on preliminary estimates, the exploitation rate on Lower Columbia River (LCR) tule Chinook exceeded the authorized limit of 0.41 in 2012. I appreciate that management imprecision in the implementation of fisheries is such that deviations from harvest ceilings can occur. In fact, management imprecision was explicitly incorporated in the assessment of the recently approved abundance based framework for LCR tule Chinook. However, post-season estimates that exceed the limit too often suggest bias in the methodology or a management strategy that may be too aggressive. NOAA Fisheries has been unable to identify a bias in the methodology used in 2012, although our assessment indicates that marine fisheries for tule Chinook did meet management expectations.

Given the circumstances, I urge the states be more cautious as you plan fisheries for 2013. The alternative, in the event of another overage, is for NOAA Fisheries to be more prescriptive in future years in providing guidance that accounts for the trend in overharvest.

I appreciate your consideration of this matter and offer any assistance that can be provided by NOAA Fisheries to address this concern.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Turner".

Robert Turner  
Assistant Regional Administrator

cc: Phil Anderson, WDFW  
Roy Elicker, ODFW  
Don McIsaac, PFMC