



Quinault Indian Nation

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Mr. Dave Ortmann
Chair
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Dear Chairman Ortmann and Council Representatives,

We offer these comments on the STT's "overfishing" assessment of Queets coho (agenda item G3b. STT Report 1, March 2010) for your consideration.

Post season analysis indicates that the 2009 natural spawning escapement for Queets coho will be at least 13,000, well above the lower end of the spawning escapement range for this stock identified in the FMP, thus ending the overfishing status under the Council's guidelines.

We note that Table 2 of the report does not contain the data currently being employed by Quinault Fisheries Department for management of this stock. An updated dataset has been provided to the STT; differences do not appear to be sufficient to affect the general analysis, but would affect estimates of survival.

The STT expressed an opinion that an examination of the preseason forecasting methods and terminal run size assessment procedures could substantially improve the abundance projections and ability to meet the FMP conservation objectives. As a normal part of our management responsibilities, Quinault fisheries staff rigorously evaluates pre-season forecasting methods and terminal area management procedures. We would welcome specific suggestions from the STT for improving the precision and accuracy of forecasts for Queets coho ocean recruitment and survival.

We found it curious that the STT's report failed to include a description of the existing management objective for Queets coho in its report. This oversight could lead the uninformed to erroneously conclude that the failure to achieve spawning escapements within the target range represents a conservation concern. The spawning escapement range for this stock was established over two decades ago at a time when there was considerable uncertainty over the spawning escapement level that would be expected to maximize sustainable harvest under average conditions. Escapement ranges for Washington coastal coho stocks were derived from estimates of different habitat types, carrying capacities, smolts/spawner at high and low spawner densities (Lestelle, L. G. S. Morishima, and T.D. Cooney 1984. Determining Spawning

Escapement Goals for Wild Coho Salmon on the Washington Coast. In, Proceedings of the March 23-25, 1983 Olympic Wild Fish Conference. J.M. Walton and D.B. Houston, eds. Peninsula College, Port Angeles, WA). The parameters employed in the estimation procedure were derived from research in Canada and Oregon. Because there was considerable uncertainty over the accuracy and applicability these estimates to Washington coastal coho, a management strategy that recognized uncertainty in forecasting, management imprecision, and variability in marine survivals was developed and implemented. This strategy was expected to produce a range of spawning escapements to inform underlying relationships between spawners and subsequent production. Escapements below the lower end of the range were anticipated and were not a conservation concern. Available data indicate that spawning escapement levels of Queets coho play a much smaller role in determining recruitment than marine survival conditions. The ability of this stock to respond to improved ocean conditions has been repeatedly demonstrated despite escapements that are below the lower end of the spawning escapement range. We concur with the STT that the failure to meet the conservation objective in 2006-2008 does not jeopardize the long term sustainability of this stock.

We do not agree with the STT's assertion that there is very little that the Council can do to manage its fisheries to mitigate overfishing of Queets coho. This statement is incorrect and misleading. Historically, Queets coho was a chronic driver stock for shaping Council fisheries. While conservation concerns for lower Columbia, Oregon coastal, Puget Sound, and Interior Fraser coho have largely limited impacts of Council fisheries on Queets coho in recent years, there is no assurance that circumstances might not change in the future.

Lastly, we wish to comment on the STT's recommendation regarding "buffers." Forecast and/or management "buffers" could increase the probability of producing escapements within the established range, but would intentionally introduce bias into fishery planning processes. Although the impact of buffers for Queets coho forecasts is uncertain given the complexity of mixed-stock fishery management, it is conceivable that buffers could result in the unnecessary imposition of fishery restrictions. We believe that the Council should only consider using "buffers" to adjust preseason forecasts under extraordinary circumstances, such the discovery of systematic error in methods or the availability of information on environmental conditions that threaten to result in unprecedented reductions in marine survivals (the Council took such action when the effects of an intense El Niño became apparent during the 1980s). It is very likely that any attempts by the Council to impose buffers for fishery management outside the FMZ would generate considerable controversy.

Sincerely,



Ed Johnstone, Fisheries Policy Spokesperson
Quinault Indian Nation