



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE
Northwest Region
7600 Sand Point Way N.E., Bldg. 1
Seattle, WA 98115

JUN 09 2000

Mr. Jim Lone, Chair
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, OR 97201

RECEIVED

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PFMC

Dear Mr. Lone: *JIM*

During the past several years the Council has adopted ocean fishing regimes resulting in overall exploitation rates on OCN coho salmon significantly lower than those required by Amendment 13 to the Ocean Salmon FMP. However, because Amendment 13 provides no specific guidelines for establishing management measures or for restricting overall exploitation rates when ocean run sizes and brood year escapements are as low as we have recently experienced, the Council has relied on agency guidance, particularly from NMFS.

I believe that it would be helpful to the Council if Amendment 13 were amended to provide more specific guidelines for the establishment of restrictions on either total exploitation rate or harvest rate in the ocean fisheries that should be required under the most adverse stock condition. Additional guidelines that address current stock size and survival trends would also be helpful to NMFS when we reinitiate consultation on the FMP.

When the harvest provisions of the Oregon Plan, which formed the basis of Amendment 13, were developed and analyzed, neither marine survival rates nor ocean exploitation rates as low as those we have seen in the past three years had been anticipated. The worst scenario considered was a continuation of recent low survival rates which were still high enough to allow for limited rebuilding of OCN stocks with minimal incidental harvest impacts. Since 1997 survival rates have been so low that most stream-rearing OCN stocks would have failed to replace themselves in the absence of any harvest impacts. Under these conditions no harvest is sustainable.

When the exploitation rate matrix was developed it was believed that the recent marine exploitation rates in the range of 10 to 13% were the lowest rates that could be practically achieved. Yet in the past two years we have managed for OCN exploitation rates in the range of 8 to 9%. In 1999 and 2000 Amendment 13 would have allowed for impacts as high as 15%. We appreciate the measures the Council has taken in the past 2 years to maintain harvest impacts well below the maximum rates permitted by Amendment 13, but do not believe that it is prudent to allow for increases in harvest impacts in US fisheries in the light of recent OCN survival rates.

Consequently, NMFS requests the Amendment 13 Review Committee be directed to recommend specific guidelines for establishing appropriate total exploitation rate, or harvest rate restrictions,



that are designed to **minimize** fishery impacts on OCN coho salmon in Council fisheries consistent with recent OCN stock size and survival rates and the low harvest rates achieved in the past two years.

Sincerely,

A handwritten signature in black ink, appearing to read "William Stelle, Jr.", written in a cursive style.

William Stelle, Jr.
Regional Administrator