

National Audubon Society

Exhibit E.2.d
Public Comment
September 2000

Ten Mile Creek Sanctuary

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Date: July 23, 2000

Subject: Comments concerning Amendment 13

Attn: SSC, STT, and Oregon Coastal Natural coho Work Group

I would like to take this opportunity to submit comments concerning the PFMC directed Amendment 13 comprehensive adaptive analysis to be completed in 2000.

When one reviews the amendment it becomes clear that there are two separate components that should be included in any comprehensive adaptive analysis. First, the estimated production parameters for freshwater habitat derived from the Habitat-Based Life Cycle Model developed by Nickleson and Lawson (1996), and a second component, the fishery impact limit and spawning rebuilding criteria used in the amendment.

While I agree with the Goals and Objectives identified by the OCN Work Group I am concerned that there are a number of other issues and analysis that are necessary if a full comprehensive adaptive review is to be completed for the Council and NMFS. The two technical concerns that the Council's Scientific and Statistical Committee and the Salmon Technical Team explicitly identified as review items in Section 4.3 are; (1) how well the amendment provides for significant rebuilding towards full seeding and (2) a detailed review of the selection of parental spawner and marine survival criteria that trigger allowable impact rates in fisheries. While these are critical issues for review I would like to the Work Group to consider the following;

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- At present Amendment 13 identifies basins with a 'Severe conservation problem' to be at less <10% full seeding of best habitat. If you look at this direction closely it becomes clear that it is not conservative enough to protect the genetic integrity of many of our coho populations. For example, in the Tillamook basin the spawners needed to fully seed the best habitat is 2,000 adults using the Habitat based model. So, this 'severe conservation direction' would not be implemented until there is less than 200 spawners returning to the whole Tillamook basin. Does the Council and NMFS really believe there is not a severe conservation problem until the adult abundance estimates for all five rivers emptying into the Tillamook basin has reached the low of 200 returning adults. The Nestucca River would be another example, - full seeding of the 'good quality habitat' using the model would be 1,800 adults returning to spawn naturally and the 'severe conservation direction' would not be in effect unless the abundance estimate was less than 180 adults. This river has approximately 170 mile of spawning habitat!
- Fragmented populations is a significant issue that must be addressed as Council attempts to understand recovery of the numerous ESA listed populations. If one reviews adult spawner count estimates by basin, and spawner distribution patterns it becomes clear that there are a few demes that are holding up the total spawning abundance estimate for a basin.
- Predictive capabilities of models. In the recent past the agencies have over-predicted OCN coho abundance 13 out of 14 years. Shouldn't this issue be reviewed if we expect to improve abundance estimates especially when populations are so low in many basins? We are not achieving stock replacement at the population scale, the sub-unit scale, nor at the deme scale, the true unit of conservation.
- Marginal habitats are not taken into account. When Amendment 13 discusses 'full seeding' it actually is referring to only about 25% of the anadromous habitat in our OCN rivers and lakes - the good quality habitat. What is the scientific rationale to increase fishing pressure when populations are at 50% seeding of the good quality habitat thereby postponing the recovery in to the future as well as failing to acknowledge marginal habitats and small populations?

- How exactly is the amendment going to utilize the ODFW life history monitoring data – smolt production from each site to verify model abundance estimates and ocean conditions? Are the various monitoring sites a real representation of existing aquatic habitat conditions throughout the Coast Range? How is the ODFW monitoring program going to be linked to fishing rate triggers established in Amendment 13?
- The habitat model uses an egg deposition to summer parr as a constant 7.2% for all stream reaches when at full seeding. How was this data point derived and does this truly reflect the condition of Oregon coastal streams? What are the implications of over predicting survival at this stage of the model?
- The model looks at habitat carrying capacity by basin and sets abundance criteria for full seeding but fails to discuss stream productivity in relation to nutrient recycling. Bilby, Cedarholm, and Brickell have all documented the fact that spawned out carcasses are a vital source of nutrient enrichment which stimulates primary production in streams. This research must not be ignored when developing basin specific escapement goals.
- Data from Rapid Bioassessment on fish distribution indicates fry distribution patterns may be different than model projections at the reach level. I would urge the Work Group to discuss this issue of seasonal distribution with ODFW Research and review data gathered from Mid-Coast Watersheds Council Rapid Bioassessment Project.
- Model does not take into account significant storm events that effect overwintering survival. Accelerated sedimentation, bedload scour, and channel stability are all significant factors affecting early life history survival. Does this model take a conservative approach if data is unavailable?
- Should there be an analysis concerning differential impacts to severely depressed OCN North coast populations and Lower Columbia/Clackamas/ Sandy as a result of multiple selective fisheries off the Oregon Coast as well as North of Falcon and Buoy 10.

- While state and federal agencies fully analyze and research the issues identified I would urge the Council and NMFS to take a precautionary approach when setting OCN exploitation rates. We would support a strategy that would include a three brood cycles <5% total exploitation rate (freshwater as well as ocean) in order to maximize spawner recruitment.

I believe that many of the issues that been identified by the IMST and the public may in fact be a research projects that should be initiated immediately in order to use the data as soon as possible.. If I can be of any further assistance in developing recovery strategies do not hesitate to call.

Sincerely,



Paul Engelmeyer
NW Policy Analyst
Living Oceans Program