

National Audubon Society



Exhibit B.4.K
Supp Public Comment

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To: Pacific Fisheries Management Council
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From: Paul Engelmeyer
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Living Oceans Program
National Audubon Society

April 2, 2002

Dear Mr. McIsaac:

Audubon welcomes this opportunity to comment on the proposed 2002 salmon fishing season. There are a number of issues and concerns that I would like to draw to your attention.

Coho Salmon

It is essential that the Council maximize spawner abundance on this Oregon Coastal Natural (OCN) coho 2002 brood year. The parental spawning escapement that produced the OCN coho salmon returning in 2002 was approximately 35,000 coast-wide excluding the lake component. If you review the recently released ODFW document entitled, '**Population Assessment: Oregon Coast Coho Salmon ESU**' by Thomas Nickleson you will see that it clearly indicates that these populations have just barely reached abundance's that are out of the '**Critical Threshold**' designation (see enclosed graphs Figure 8, 10, and 12). Although I still have a number of concerns about the document, the analysis shows that these stocks are in the initial stage of recovery, with many basins having spawning densities of only 5 to 10 fish per mile.

I urge the Council, when considering the 2002 salmon fishing options to review the Scientific and Statistical Committee's (SSC) supplemental technical memo dated 11/2000 which states "...**The SSC stresses that**

when stocks are in the 'Critical' parental spawner category there is no biological justification for allowing harvest." This level of concern is not just limited to the SSC. In the 9/6/2000 letter from the Independent Multidisciplinary Science Team (IMST) to ODFW, the team recommended the following, **"...Because spawner abundance has been extremely low and recruitment for all three recent brood years (1995, 1996, 1997) has been below replacement, fishery impacts should be as close to zero as possible until established signs of recovery are observed."** So, when there are 4 fish per mile there is no biological justification for allowing harvest but now that we are at 5 to 10 salmon per mile we can increase our impacts to the next level even though there are miles of available habitat. The proposed management regime is planned over-fishing in order to have access to hatchery fish, as well as ignoring the millions of dollars being spent by federal and state agencies to recover our coastal wild populations. Once again, I urge the SSC and STT to review the enclosed Figures 8, 10, and 12 and discuss the harvest rate triggers that are in Amendment 13 and the Lower Columbia River Coho management matrix.

In Preseason Report 1, Stock Abundance Analysis for 2002 Ocean Salmon Fisheries the document Table A-1 acknowledges that state and federal agencies have yet to define Conservation Objectives for a number of stocks such as:

- Columbia River coho (naturals) listed under Oregon's Endangered Species Act (ESA)
- Southern Oregon/Northern CA Coastal /ESA listed 5/97
- Central CA Coast Coho / ESA listed 10/96
- Central Valley Spring-run chinook /ESA listed 9/99
- CA Coastal chinook /ESA listed 9/99

It is critical that the Council moves forward with the development of Conservation Objectives as well as defining exploitation rates for all stocks impacted by Council management, such as Klamath Spring Chinook and Sacramento Fall Chinook.

I urge the Salmon Technical Team and the SSC to consider including the Lower Columbia River coho (naturals) as two subunits of the OCN coho management regime. There must be consistency with the state of Oregon's salmon recovery strategy for all naturally spawning coho. When there is discussion concerning rebuilding strategies and/or increasing exploitation rates, all indicators of recovery must be acknowledged and included in the

analysis. The IMST has recently completed the report entitled, '**Salmon Escapement and Harvest Management: Implications for Rebuilding Stocks of Wild Salmon in Oregon**' which clearly identifies the criteria to evaluate recovery - abundance, productivity, spatial and temporal structure, genetic diversity and ecological functions.

Selective Fisheries Considerations

Audubon is very concerned about the regional fisheries management's ability to appropriately analyze and manage selective fisheries. The risks and potential consequences of multiple selective fisheries create difficulties in modeling non-landed mortalities. The region has moved into a new fisheries management regime with inadequate review and analysis. We urge the Council to develop a comprehensive review of nonretention fisheries management. This review should include independent peer review process in addition to the Council's SSC and STT advisory bodies.

In the 9/6/00 letter to ODFW, the Independent Multidisciplinary Science Team concluded; "**Current estimates of mortality from non-retention fisheries are highly variable, subject to substantial uncertainty, and cannot be characterized as accurate. Experimental methods are limited and subject to many sources of error. Even low incidental mortality rates of OCN coho salmon could significantly slow recovery for depressed stocks. Scientific review of hook and release mortalities should be an on-going process, as environmental conditions change.**"

Ocean Productivity and Environmental Conditions

Recent information concerning ocean productivity and environmental conditions indicates that despite record levels of upwelling off the Oregon coast during spring-summer 2001, the conversion of coho smolts to jacks appears to have been poor this year. This information has significant ramifications for salmon populations' region-wide. There is potential for negative impacts to returning adults 2002. Short-term fluctuations in ocean productivity and adverse environmental conditions dictate the need to ensure maximum spawner abundance in order to protect genetic integrity of the numerous ESA listed salmon populations. I urge the state and federal agencies to take a precautionary approach when projecting wild salmon abundance over the next few brood cycles.

Recommendations:

Audubon urges the Council to endorse the following recommendations,

- 1) Support Option III, the most conservative option for the 2002 salmon-fishing season, in order to maximize spawner abundance and protect genetic integrity of the numerous ESA listed salmon populations throughout the region.
- 2) Initiate an independent comprehensive review of the regional non-retention fisheries management regime.
- 3) Initiate technical analysis for including the Lower Columbia River coho (naturals) into the OCN coho sub-unit management regime, and develop a timeline for the establishing Conservation Objectives for stocks impacted by Council management that have no spawning escapement goal.
- 4) Utilize a precautionary approach when ESA listed salmon populations are being impacted or when knowledge base is limited.

Sincerely,



Paul Engelmeyer
Living Oceans Program
Audubon

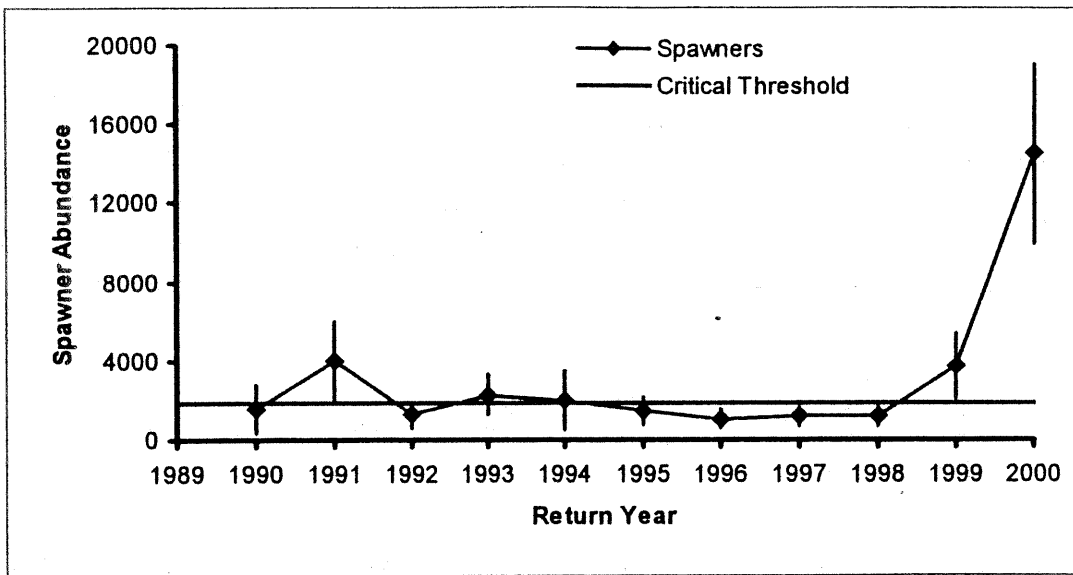


Figure 8. Trend in adult coho salmon abundance relative to the critical population level for the Nehalem Complex. Error bars are 95% confidence limits.

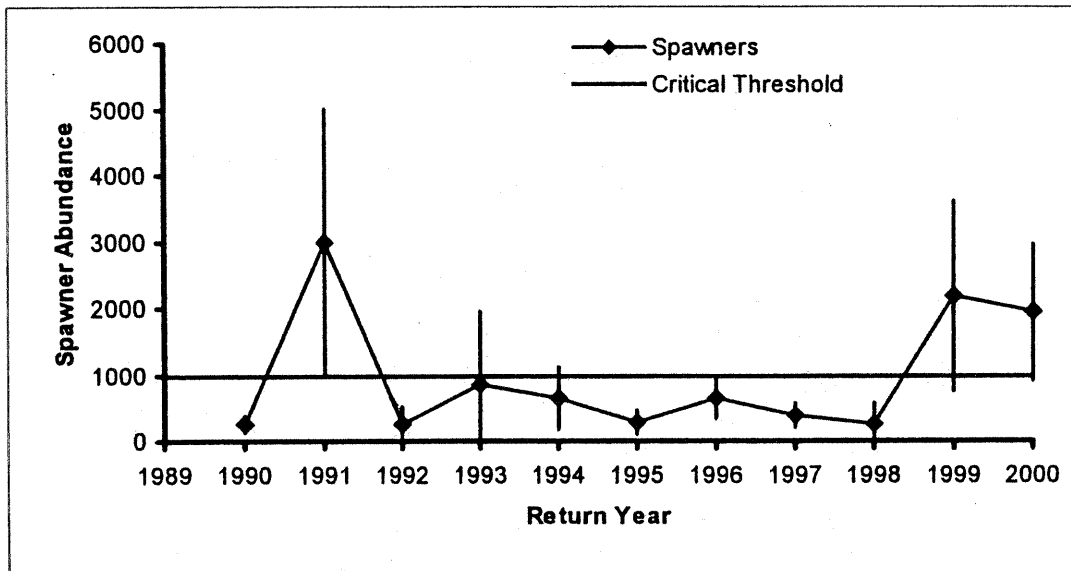


Figure 10. Trend in adult coho salmon abundance relative to the critical population level for the Tillamook Complex. Error bars are 95% confidence limits.

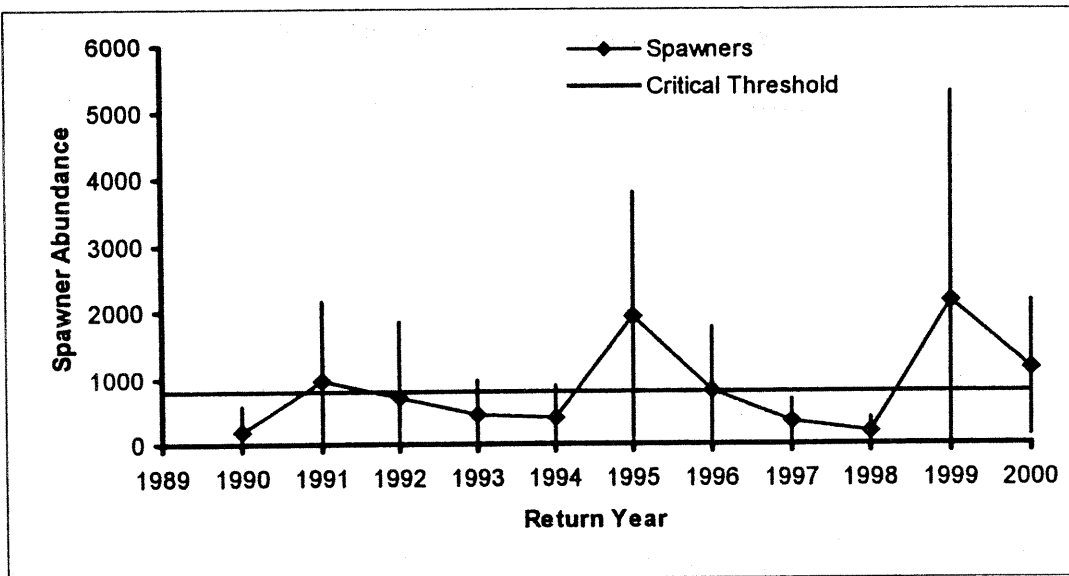


Figure 12. Trend in adult coho salmon abundance relative to the critical population level for the Nestucca Complex. Error bars are 95% confidence limits.

**Annual estimates of wild coho spawner abundance
in coastal river basins within the Oregon Coastal ESU, 1990-99.**

Gene Conservation Area, Basin/Group	Spawner Abundance by Return Year									
	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999 ^a
North Coast:										
Necanicum R. & Elk Creek	191	1,135	185	941	408	211	768	253	946	708
Nehalem R.	1,552	3,975	1,268	2,265	2,007	1,463	1,057	1,173	1,190	3,540
Tillamook Bay	265	3,000	261	860	652	289	661	388	271	2,177
Nestucca R.	189	728	684	401	313	1,811	519	271	169	2,109
Sand Lake & Neskowin Cr		240	24	41	77	108	275	61	0	45
Miscellaneous	-	204	-	-	-	-	-	-	-	-
Total	2,197	9,282	2,422	4,508	3,457	3,882	3,280	2,146	2,576	8,580
Mid Coast:										
Salmon R.	385	39	28	364	107	212	271	237	8	124
Siletz R.	441	984	2,447	400	1,200	607	763	336	394	997
Yaquina R.	381	380	633	549	2,448	5,668	5,127	384	365	2,596
Devil's Lk. & Beaver Cr.	23	-	756	500	1,259	-	1,340	425	1,041	3,397
Alsea R.	1,189	1,561	7,029	1,071	1,279	681	1,637	680	213	1,996
Yachats R.	280	28	337	287	67	117	176	99	102	151
Siuslaw R.	2,685	3,740	3,440	4,428	3,205	6,089	7,625	668	1,089	2,796
Miscellaneous	207	-	700	180	250	231	1,188	13	71	77
Total	5,591	6,732	15,370	7,779	9,815	13,605	18,127	2,842	3,283	12,126
Umpqua:										
Lower Umpqua R. & Smith R.	589	1,316	1,759	4,804	1,689	6,803	4,904	935	5,118	2,447
Mainstem Umpqua	455	-	192	1,431	1,240	352	339	397	444	1,261
Elk & Calapooya Cr.	185	-	-	-	708	2,315	1,709	196	379	443
South Umpqua	2,508	2,284	-	2,415	579	755	1,685	512	1,807	1,235
Cow Creek			201	661	269	1,124	1,112	193	678	1,197
Total	3,737	3,600	2,152	9,311	4,485	11,349	9,749	2,233	8,426	6,526
Mid-South Coast:										
Coos Bay & Big Cr.	2,273	3,813	16,545	15,284	14,685	10,351	12,128	1,127	3,167	4,867
Coquille	2,712	5,651	2,115	7,384	5,035	2,116	16,169	5,720	2,466	3,021
Total	4,985	9,464	18,660	22,668	19,720	12,467	28,297	6,847	5,633	7,888
Oregon Coastal ESU	16,510	29,078	38,604	44,266	37,477	41,303	59,453	14,068	19,816	35,177

^a Estimates for 1999 are preliminary.