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To: Pacific Fisheries Management Council
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From: Paul Engelmeyer
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Living Oceans Program
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March 26, 2003

PFMC

Dear Mr. McIsaac:

Audubon welcomes this opportunity to comment on the proposed 2003 salmon fishing season. There are a number of concerns that I would like to draw to your attention concerning the Council's management issues.

Mark Selective Fisheries and Methodology Considerations

In light of the new direction to mark all hatchery fish produced in federally funded facilities Audubon is very concerned about the existing management's ability to appropriately analyze and manage Mark Selective Fisheries (MSF). The region is in the process of moving into a new fisheries management regime with inadequate review and analysis. The risks and potential consequences of multiple selective fisheries create difficulties in modeling non-landed mortalities. We urge the Council to develop a comprehensive review of nonretention fisheries management as well as the chinook and coho FRAM. Audubon supports the direction to establish a Model Evaluation Workgroup which should include the Council's Scientific and Statistical Committee (SSC) and Salmon Technical Team (STT) as well as key members of the regional Technical Recovery Teams.

Audubon strongly supports the direction in the NOAA March 7 communication to the Council which identified the need to employ an appropriately risk averse approach to uncertainties with regards to MSFs.

All uncertainties should be clearly articulated and a transparent precautionary measure implemented.

The November 2002 Supplemental STT Report Exhibit C.4.c clearly identifies a number of Conclusions and Recommendations for Council consideration. To highlight a few of the 11 Recommendation and Conclusions;

- Mortalities of unmarked fish likely underestimated. **The STT's review has identified several factors that lead it to conclude that the proposed modifications to chinook FRAM would likely underestimate mortalities of unmarked fish in MFSs.**
- Management buffers should be considered. **The STT recommends that the Council consider incorporating an explicit methodology to establish buffers for management targets (e.g., reduce model targets for exploitation rates below ESA jeopardy standards) to compensate for increased bias and uncertainty.**
- Model Documentation. **The STT strongly recommends that a high priority be placed on updating model documentation.**

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."**

In regards to key stocks of concern I would like to draw attention to a number of issues:

ESA listed Coho Salmon;

As the Council is aware there is no abundance estimate / conservation objective / or reliable exploitation rate for the ESA listed coho in the Transboundary or the Central California Evolutionarily Significant Units (ESU). This makes the Council incredibly vulnerable especially in light of the fact that once again ESA Klamath coho will be focal point for discussion concerning water quality and quantity issues in the basin.

Audubon is very concerned that the ODFW management direction for Lower Columbia River Natural Coho (LCN) in '03 fails to protect the weaker populations in that ESU. While the LCN coho are not listed under the Federal ESA they are listed at the State level. Using the stronger populations in the Clackamas and Sandy Rivers as coho abundance estimates to represent the total LCN status is inappropriate. I see no scientific rationale for a higher exploitation rate for LCN coho than for our Oregon Coastal coho. In fact, there are a number of populations in that ESU that should warrant putting the whole area into a "Critical Category".

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.

In Preseason Report 1, Stock Abundance Analysis for 2003 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.

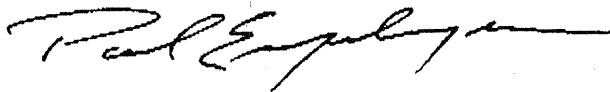
In light of the fact that, there are ESA listed salmon stocks from Central California up through Oregon including Lower, Mid and Upper Columbia Evolutionarily Significant Units (ESU) as well as Puget Sounds stocks for a total of 11 coho and chinook listed ESUs region-wide. And that millions of dollars and thousands of volunteer hours are being spent every year to improve habitat conditions in our watersheds throughout the region for our naturally produced salmon. Audubon urges the Council to maximize spawning abundance in order to protect the genetic integrity of our ESA listed stocks.

Recommendations:

Audubon urges the Council to endorse the following recommendations,

- 1) Support Option III, the most conservative option for the 2003 salmon-fishing season, in order to maximize spawner abundance and protect genetic integrity of the numerous ESA listed salmon populations throughout the region.
- 2) Establish a Model Evaluation Workgroup and 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
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Audubon