



## Upper Skagit Indian Tribe

25944 Community Plaza Way,  
Sedro Woolley, WA 98284  
Phone (360) 854-7090 Fax (360) 854-7042

### Upper Skagit testimony to PFMC on 2017 pre-season fisheries planning

The Skagit River is facing a second year of “critical” abundance coho returns, below 16,000 wild spawners, since 2015. Recent average (2001-14) escapement of >55,000 wild coho plummeted to 5,800 in 2015 and is predicted to be 11,000 in 2017. By definition critical escapement is “the escapement level below which an unacceptable risk exists that the abundance will be less than the low breakpoint in one to three cycles”. Our critical spawning escapement goal of 16,000 has not been achieved in two of the last three years. Based on the record low return in 2015 we could expect an even worse return in 2018.

The “Comprehensive Coho Management Plan”<sup>1</sup> (*de-facto* co-management guidelines) states:

*When the abundance of a key wild management unit is in the critical category, the intent of the plan is to prevent the escapement from falling below the critical/low breakpoint. The CCW recognized that the identification of the critical fishing regime required to achieve this objective will require difficult policy decisions. We recommend that exploitation rates in the critical regime fall between the maximum possible reduction (no mortality in U.S fisheries) and the lowest rate previously achieved (predicted to have been approximately 10% of the age 3 cohort for the Strait of Juan de Fuca management unit in 1997).*

The critical wild coho critical abundance breakpoint of 16,000 established when marine survival rates of Skagit coho were greater than 9% (and a poor MS rate was 4%); Recent marine survival rates have been below 4%. If these survival levels do not improve significantly it could be decades before these critical stocks rebuild to a stable “normal” abundance status. In light of the current situation, we expect that it will be several years before we see a consistent wild return level which regularly exceeds our “low” stock status threshold.

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| Skagit wild coho management abundance levels as established in the Comprehensive Coho Management Plan. Under the current “Low” ocean option (1725) Skagit wild coho escapement is forecast at 9,620. |                              |
| Critical Abundance   | Below 16,000 wild escapement |
| Low Abundance  | Below 25,000 wild escapement |
| Normal Abundance   | Above 25,000 wild escapement |

As long as stock abundance is forecast as critical or low, it is imperative that the first priority of managers is for conservation for spawning escapement needs, as we have done with tribal in-river fisheries on the Skagit. The Skagit co-managers have forgone all directed Coho terminal

<sup>1</sup> 1998. Comprehensive Coho Workgroup. Comprehensive Coho Management Plan, Second Interim Report. May 5, 1998. The “CompCoho” management plan was never ratified by the co-managers, but is used as the basis for Puget Sound coho management by the co-managers.

fisheries, only reserving a 200 fish C & S fishery for each one of the Skagit River Tribes, in order to maximize spawning escapement. To put this in context, this minimal terminal C & S Fishery for the Upper Skagit Tribe will equate to a little more than 0.1 per Upper Skagit tribal member. All remaining proposed pre-terminal fisheries impacts must be managed in a way to maximize return of these critical stocks.

As a terminal area manager we continue to be extremely disappointed in the apparent inability of the PFM/C/NOF process to seriously address non-listed terminal area weak stock conservation needs, rather managing them from beginning the process from the perspective of how much impact we can impose on these weak stocks. This traditional management approach has failed to provide a pathway for protection and rebuilding for many Puget Sound weak stocks and it continually puts the conservation burden disproportionately on the terminal areas by eliminating harvest. In 2017 Skagit Tribes came to the initial planning discussions with our directed commercial coho fisheries zeroed out while most pre-terminal fisheries began with fishing options which ALL took no regard for the fact that Skagit escapement was well below the critical abundance threshold of 16,000 wild escapement. For conservation of the weak stocks, terminal tribes are expected to carry the conservation burden with whatever fish are left over from pre-terminal fishery impacts, forego terminal fisheries, and to pass those fish which return to the terminal area to conservation and long term sustainability objectives.

We appreciate the efforts of those who have acknowledged the critical need to conserve Skagit (and other) wild coho to spawning and have sacrificed from their fisheries, but we are here to reiterate that more must be done and we are asking everyone to reconsider their fishing options, and their approach to fisheries planning this year and in the future. **From the very beginning of the planning process, the first consideration must be for conservation of the weaker stocks.**

Terminal areas that produce these fish must be provided with healthy returns in order to rebuild and recover the abundance which provides fishing opportunity for everyone.

To accomplish this, we request that the Council adopt a fisheries package between a zero impact option and the current low (#1725) impact option.

This is essential in support of survival and rebuilding the currently weak Skagit wild coho stock.

Thank You,

Sheldon Schuyler  
Upper Skagit Policy Representative