



POINT NO POINT TREATY COUNCIL
Port Gamble S'Klallam * Jamestown S'Klallam
Fishery Services

September 12, 2019

To: Pacific Fisheries Management Council (PFMC)

From: Point No Point Treaty Council (Jamestown and Port Gamble S'Klallam Tribes)

Subject: S'Klallam Tribes Recommend Alternative-1 for Rebuilding JDF Natural Coho

The S'Klallam Tribes (Jamestown S'Klallam and Port Gamble S'Klallam) recommend to the Pacific Fisheries Management Council (PFMC) that Alternative-1 of the Strait of Juan de Fuca Coho Rebuilding Plan be adopted for managing Strait of Juan de Fuca (JDF) natural coho during the rebuilding period for the stock.

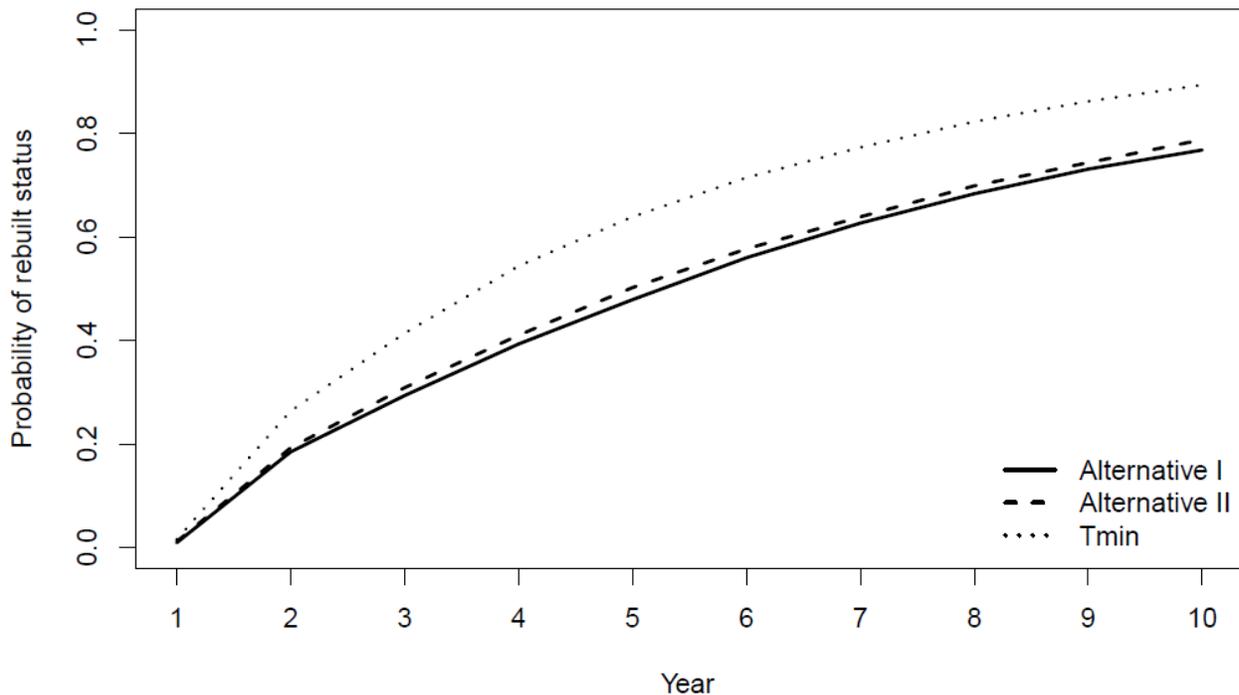
Strait of Juan de Fuca natural coho salmon have been classified in “*overfished status*” under the Pacific Coast Salmon Management Plan. An “*overfished status*” designation is triggered for a stock when the geometric mean of its spawning escapements in three consecutive years falls below its Minimum Stock Size Threshold (MSST). An “*overfished status*” designation is not always caused by overfishing or by fishery impacts, instead it can be caused by a combination of factors unrelated to fishing, including habitat degradation, poor freshwater productivity, and poor marine survival. These later factors have been identified in the (draft) Strait of Juan de Fuca Coho Salmon Rebuilding Plan as the primary causes for the low natural coho escapements that triggered the “*overfished status*” designation. Conversely, fishery impacts were determined to have had minimal effects on JDF natural coho escapements, especially fisheries under PFMC jurisdiction, which were determined to have not played a role in the stock becoming classified in “*overfished status*.” The analyses within the JDF Coho Salmon Rebuilding Plan provides compelling evidence that harvest impacts from *status quo* fisheries did not appreciably contribute to the low escapement numbers that triggered the “*overfished status*” designation.

The JDF Coho Salmon Rebuilding Plan demonstrated that low freshwater productivity and poor marine survival were the major causes for the low JDF natural coho escapements that led to the “*overfished status*” designation. The enduring effects of historic habitat loss and degradation from land management activities, such as logging, agriculture, and urbanization, continue to have an adverse effect on the freshwater productivity of JDF natural coho. However, marine survival (associated with fluctuations in ocean environmental conditions) was identified as the primary factor influencing the abundance of JDF natural coho. The combined adverse effects of low freshwater productivity and low marine survival may reduce JDF natural coho abundance below the MSST escapement level, even if there were no mortalities from fisheries. A series of years

with adverse marine environmental conditions occurred, which drove JDF natural coho escapements below the MSST, thereby triggering the “*overfished status*” designation.

Fisheries mortality on JDF coho has been consistently very low. Typically harvest ceilings on other coho stocks limit fishery impacts on JDF natural coho before reaching the ER ceiling for JDF coho. For example, from 2004 to 2017, total exploitation rates on JDF natural coho averaged less than 11%, which is well below the low abundance status ceiling of 20% under the Pacific Salmon Treaty. Furthermore, harvest impacts from PFMC fisheries represent only a small fraction of the total exploitation rate on JDF natural coho. Reducing fisheries from the *status quo* would not meaningfully contribute to the rebuilding of JDF natural coho. This can be seen in the probability curves for rebuilding in the JDF Coho Rebuilding Plan, in which the curves for Alternative-1 and Alternative-2 are nearly identical over time (Figure 1).

FIGURE 1: Projected probability of achieving rebuilt status by year under the two alternatives and the Tmin scenario. Figure 4.5.a. from the Draft JDF Coho Rebuilding Plan (STT_JDF RP_DRAFT 12_062519)



There is not a meaningful difference between Alternative-1 and Alternative-2 for rebuilding JDF natural coho, but reducing fisheries below *status quo* could potentially cause unnecessary economic harm to tribal fishers and infringe upon tribal sovereign fishing rights guaranteed by Treaty with the U.S. government. Therefore the S’Klallam Tribes support Alternative-1 (*status quo*). Furthermore, the underlying factors leading to the “*overfished status*” were the combined effects of low freshwater productivity and poor marine survival. Fisheries have had very low impacts to JDF natural coho. Therefore, the S’Klallam Tribes request that the Council adopt Alternative-1 for managing JDF natural coho salmon during the rebuilding period.