

ALASKA DEPARTMENT OF FISH AND GAME REPORT ON THE PRELIMINARY DRAFT REBUILDING PLAN ANALYSIS FOR QUEETS RIVER NATURAL SPRING/SUMMER CHINOOK

The Alaska Department of Fish and Game (ADF&G), as a potentially affected management entity, has reviewed the Preliminary Draft Rebuilding Plan Analysis for Queets River Natural Spring/Summer Chinook in agenda item E3 Attachment 1. ADF&G appreciates the efforts of the Salmon Technical Team (STT) to analyze and summarize information on Queets River natural spring/summer Chinook salmon (Queets sp/su Chinook) which has been classified as “overfished” and the evaluation the factors leading to the “overfished” status determination. ADF&G offers the following comments on the management strategy alternatives, STT recommendations, and co-manager recommendations.

Management Strategy Alternatives

The preliminary draft Rebuilding Plan Analysis provides two management strategy alternatives for Council consideration—a Status Quo alternative and an action alternative in which non-treaty North of Falcon (NOF) Council-area ocean salmon fisheries are suspended to minimize impacts to the extent practical. The STT’s evaluation of potential factors that led to the overfished status indicated that three consecutive years of poor ocean conditions impacted marine survival and unfavorable freshwater conditions across four years when the parents of these fish spawned likely caused a negative impact on spawning and rearing success. This is a data limited stock and accordingly the preliminary draft Rebuilding Plan Analysis asserts that it is not possible to determine whether marine fisheries played a role in the overfished status and that Council area fisheries likely had a minimal impact. Consequently, additional Council-area fishery restrictions do not appear to be the answer. More data are needed to inform management decisions, particularly some means of identifying these stocks in mixed-stock marine fisheries such as coded-wire tags (CWT) to provide an indication of when, where and how many of these fish are caught.

Weighing the potential expected benefits to the stock against the impacts to the fisheries and the communities that rely on them, the balance tips heavily in favor of Alternative I: Status Quo. For these reasons, ADF&G supports Alternative 1: Status Quo as the preliminary preferred alternative.

STT Recommendations

The abundance of Queets spr/su Chinook stock has been low for about two decades. ADF&G notes that the dip in productivity of this stock ironically coincides with the year that the MSY-based escapement goal was formally accepted by the Pacific Salmon Commission (2004), presumably based on data through 2003. This stock has only exceeded its MSY escapement goal of 700 fish in 2 of the past 20 years. The Science and Statistical Committee (SSC) took this a step further noting that the 3-year geometric mean has not exceeded S_{MSY} since the early 1990’s in agenda item E.3.a Supplemental SSC Report 1. Queets spr/su Chinook appear to have stabilized at a lower level of abundance, which is something that has been observed in other stocks that have experienced lower productivity borne by less favorable freshwater and marine habitat conditions. ADF&G notes that a similar circumstance exists for the neighboring Hoh spr/su Chinook stock, though not as pronounced and certainly not enough to warrant an overfished determination. As the noted in the preliminary draft Rebuilding Plan Analysis, this calls into question the current capacity of habitat and conservation goals used to manage it. It may very well be that the reference points used for management are too high for the marine and freshwater conditions this stock is subject to, as evidenced by the lower, but stable escapements observed over the past 20 or so years.

For these reasons, ADF&G supports the STT and SSC recommendation to investigate the feasibility of re-evaluating the current management reference points for this stock and update them as appropriate. The current escapement goal has not been reevaluated, to our knowledge for 20+ years, and it is readily apparent that marine and freshwater conditions have changed. It is also worth noting that fisheries have changed across this time period as well; Chinook fisheries have become far more conservative coastwide and consequently we are harvesting far fewer fish.

ADF&G also support the STT's second recommendation to improve the availability of data. ADF&G notes the pressing need to address the overfished status determination for this stock and the desirability of not ending up here again. Accordingly, more attention needs to be focused on determining what additional data could be collected in the future that could shed light on additional tools that could be used to inform management. The preliminary draft Rebuilding Plan Analysis noted several challenges due to a lack of data specific to this stock. There is no CWT indicator stock to show ocean distribution and migratory timing to provide us with a sense of when and where this stock is harvested along the seaboard and what the magnitude of catches might be. At best, only proxy stocks currently exist that may or may not reasonably approximate the distribution and migratory timing of Queets spr/su Chinook salmon. Given the differences in run timing between spring/summer and fall stocks, it is highly likely that the Queets fall Chinook CWT indicator is not a suitable proxy for spring/summer stocks; this is also evident in the figures of CWT recovery distributions from fisheries on pages 25 and 26 of the preliminary draft Rebuilding Plan Analysis. Further, these different ocean migratory patterns between "races" are observed for other rivers that have both spring and fall runs. For example, Upper Columbia River summer Chinook are not used to represent Upper Columbia River spring Chinook. Where it is unlikely that the Queets Fall Chinook stock is a reasonable proxy for Queets spr/su Chinook, it is unclear how good a proxy Quillayute summer Chinook is and it is not possible to with any certainty unless direct data are collected. There are currently only a few years of data for Quillayute summer Chinook and no CWT data for spr/su stocks. However, ADF&G would support a more formal assessment of the Quillayute Summer CWT indicator stock by the STT including a QA/QC of the data and a cohort analysis to provide more information.

Co-manager Recommendations

Broadly, ADF&G appreciates and supports the four co-manager recommendations: habitat restoration projects, precautionary inseason management, hatchery supplementation projects (if warranted), and external outreach by co-managers to the Pacific Salmon Commission (PSC). ADF&G finds value in communicating when a stock is experiencing low productivity with relevant management entities. ADF&G is a bit perplexed about the co-managers' interest to communicate through the PSC to the North Pacific Fishery Management Council and what that is envisioned to accomplish and notes that this stock is not included in the Alaska Salmon Fishery Management Plan. ADF&G notes that without more stock specific data and the tools to identify when and where Queets spr/su Chinook are caught, it will be difficult to take specific management actions to conserve this small stock, particularly in distant mixed-stock fisheries 500-1000 nautical miles away. Even so, communicating the issue and promoting awareness with relevant management entities is an appropriate step that ADF&G would support.