

NATIONAL MARINE FISHERIES SERVICE REPORT ON REVISED 2019 GUIDANCE  
FOR SACRAMENTO FALL, KLAMATH FALL, AND PUGET SOUND CHINOOK  
April 11, 2019

At the March meeting, our guidance letter purposely left some ambiguities for some of our management objectives to allow flexibility in shaping alternatives and to explore the consequences of various options. As you know, our guidance letter is specifically designed to provide guidance for ESA-listed species but also provides guidance on management objectives for some non-listed species of particular relevance to Council fisheries such as Sacramento River and Klamath River Chinook salmon. We make a distinction between our guidance on ESA listed stocks which generally refers to regulatory limits and guidance in terms of recommendations and observations for non-listed stocks. NMFS would like to provide some additional thoughts and refinements to our March guidance for Sacramento fall, Klamath fall, and Puget Sound Chinook based on additional information available since the March Council meeting.

For Sacramento fall Chinook, similar to 2018, NMFS recommended that the Council consider a more risk-averse approach and target escapement in the upper end of the Sacramento fall Chinook conservation objective range, i.e., 151,000 and greater. We also indicated that at least one of the options adopted for public review and comment at the March Council meeting include a target escapement of 180,000 adult spawners. Recall that in 2018 NMFS collectively expressed concern for the status of the stock and the pattern of management error. The Council at that time adopted an alternative reflecting a risk averse approach designed to target 151,000 spawners in hopes that it would achieve an escapement of 122,000 or higher. There were a number of reasons considered in shaping our guidance for 2019, many similar to those in 2018. The stock remains in an overfished status and, the details of the draft rebuilding plan were not yet available. In the interim the FMP requires the Council to “*structure Council-area fisheries to reduce the likelihood of the stock remaining overfished and to mitigate the effects on stock status.*” NMFS observed that from 2014-2018 the management error had consistently missed the mark on forecasts, expected escapements and exploitation rates. Although 2018 returns were closer to preseason expectations, hopefully signaling progress in addressing forecast error, escapements were again below the floor of 122,000 and, more to the point, well below the buffered target of 151,000. Exploitation rates were again significantly above expectations. A bright spot is that the forecast for 2019 is significantly higher and could provide relief to fisheries that have been constrained for several years. Considering this information, at the March meeting the Council adopted alternatives ranging from 151,000 to 180,000 for public review and comment. The purpose, as it has been every year, was to learn something about the consequences and benefits from that range of alternatives to both the stock resource and to the fisheries, and thereby inform the Council’s shaping of a fishing regime within that range that finds a balance to both the fishery and the resource while meeting the FMP requirements.

In refining the guidance, we also considered the new information in the Preseason-II report, public, stakeholder and tribal testimony regarding the alternatives, the opportunities represented among the alternatives and the information now available in the draft rebuilding plan. The modelling results reflect a range of escapements with significant increases in commercial (38-

67%) and recreational (12-22%) opportunity and economic gain in most areas (not all) when compared with 2014-2018, particularly for Alternatives 1 and 2. Public comments showed relatively similar support for both Alternatives 1 and 2, and we received tribal comment in support of Alternative 2. The draft rebuilding plan concluded that forecast and management assessment error was one of several causal factors contributing to low adult spawner escapement in 2015-2017, reflecting the concerns raised in the March guidance letter. Over the last four years we have been short of the 122,000 escapement floor by 33,000 spawners although we have taken steps to try and reduce error. As resource stewards, we know it is also important to look ahead and consider this year in the context of what may be expected in the near future. In our March guidance letter we noted that 2017 escapement was a record low, and we understand that the outmigrants from that parent brood were also low. So it is likely, based on the information at hand, that returns in 2020 will be low, potentially exacerbating the status of the stock and presenting another challenging management year. Providing additional escapement this year, particularly if the bias in management error remains unresolved, is a prudent approach. Having considered all the information available at this time, NMFS' point of view is that managing for a target escapement similar to that reflected in Alternative II (i.e., 164,000) would best balance the needs and interests of the fisheries with the needs and interests of the fish. We look forward to hearing the perspective of others.

Likewise for Klamath River Fall Chinook, NMFS had suggested we explore some alternatives for more risk-averse approach. Again the stock continues to meet the overfished criteria and the rebuilding plan was not available at the time of our guidance letter. Compared to Sacramento River fall Chinook, we do not have the same management error problems with Klamath River Fall Chinook. Better forecasting, better data generally, and a better record of being both above and below forecast exploitation rates particularly with regard to exploitation rate and particularly in recent years. In particular, age-structured stock assessments and forecasts are integral to management of Klamath fall Chinook. These are currently lacking for Sacramento River fall Chinook and are recommended in the draft SRFC rebuilding plan to improve performance. In addition, the draft rebuilding plan concludes that assessment and management errors likely played a relatively small role in the overfished status of Klamath River fall Chinook. These are important differences between the two stocks. NMFS have heard some comments from the tribes including a firm commitment to the conservation objective. Through the week we will probably hear from other folks too. In this context and from our perspective, managing for the conservation objective of 40,700 spawners is an appropriate thing to do. However, although the forecast and escapement performance has improved in the most recent years, we are mindful of the lower forecast for 2019 and the variability inherent in salmon. For all the fisheries, including the in-river fisheries, NMFS encourages careful and cautious management to adhere to the 40,700 with a hope that any management error falls on the positive side again. In this case, we have hope that we can achieve some extra escapement as we did in 2018 as a consequence of targeting 40,700, building on our success and further reducing the likelihood of the stock remaining overfished.

Lastly, relative to Puget Sound Chinook, we noted in our letter submitted in March that additional guidance may be provided to the Council in April pending further discussions with the Puget Sound co-managers, and based on information developed through the North of Falcon process should differences arise between our guidance and the comanagers fishery shaping. NMFS has not identified substantive differences at this time. However, those conversations are on-going and so we do not have additional guidance to offer at this time.