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May 27, 2011

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PFMC

Mr. Mark Cedergreen, Chair
Pacific Fishery Management Council
7700 Southeast Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Amendment 16 comments

Dear Chairman Cedergreen and Council Representatives:

The Puget Sound Indian Tribes (Tribes) and the Washington Department of Fish and Wildlife (Department) offer these comments on the Ad Hoc Salmon Amendment Committee's (SAC) "Draft Environmental Assessment for Pacific Coast Salmon Plan Amendment 16" for your consideration. We intend for our comments to assist the Pacific Fishery Management Council (Council) in adopting quantifiable status determination criteria (SDC) for Puget Sound management units, including both the Minimum Stock Size Threshold (MSST) and the Maximum Fishing Mortality Threshold (MFMT), that are consistent with existing stock-specific management objectives, United States-Canada treaty obligations, and to provide a mechanism for the Council to initiate overfishing reviews when warranted in the future.

Management objectives for five Puget Sound natural coho management units, specifically for eastern Strait of Juan de Fuca, Hood Canal, Skagit, Snohomish and Stillaguamish coho, were originally developed by the co-managing Tribes and the Department as the Puget Sound Comprehensive Coho Management Plan (PSCCMP) and recently incorporated into the Council's Salmon Fishery Management Plan. These management objectives are based on current assumptions about survival and productivity and will be updated as information indicates changes to key assumptions. For example, watersheds from which these stocks originate are the focus of habitat recovery efforts and we anticipate updating the management objectives as warranted with improvements in habitat conditions. The PSCCMP approach establishes three abundance or status categories (normal, low and critical) for each of the key wild management units. The change from critical to low status is determined by escapement numbers associated with risk of future population instability, unpredictability, or productivity. We recommend that the MSST for these five Puget Sound natural coho management units be defined by the "breakpoint" in escapement numbers associated with this change in stock status.

The change from low to normal status is determined by escapement numbers with low risk to future production and the achievement of MSH. The PSCCMP defines a maximum exploitation rate associated with each management unit's normal status category that will provide for MSH assuming average environmental and survival conditions. A low status category exploitation rate is defined to provide for

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MSH assuming low survival conditions and a more conservative exploitation rate ceiling associated with the critical status category is defined to prevent the escapement from falling below the critical low breakpoint.

The Southern Coho Management Plan (SCMP) of the recently revised (2009) Pacific Salmon Treaty (PST) has adopted the same abundance based, stepped exploitation rate approach to managing coho salmon fisheries in the United States and Canada. The SCMP defines a range of maximum exploitation rates for each of the three status categories. We recommend that the MFMT for these five Puget Sound natural coho management units be defined as the fishing mortality rate ceiling values for each management unit associated with the normal or abundant status categories developed for the PSCCMP. These exploitation rates are equal to or less than the maximum exploitation rate defined by the SCMP of the PST (65 percent).

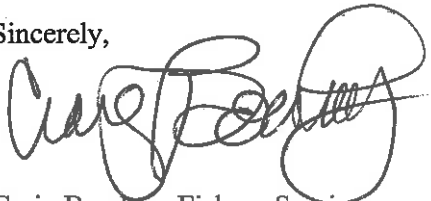
However, since both the PSCCMP and the SCMP are structured with stepped exploitation rates associated with changes in the assumptions about MSH spawner escapement levels, MFMT values used by the Council should also be responsive to estimated lower abundance status. When the status of these management units is either critical or low (low or moderate in PST terms), we recommend that MFMT for Puget Sound coho reflect lower annual total exploitation rate ceilings associated with the PSCCMP.

For Council purposes then these tables would be combined as follows:

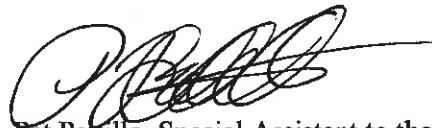
Management Unit	Maximum Fishery Mortality Threshold (MFMT)*	Minimum Stock Size Threshold (MSST)
Skagit	20%, 35%, 60%	16,000
Stillaguamish	20%, 35%, 50%	6,100
Snohomish	20%, 40%, 60%	31,000
Hood Canal	20%, 45%, 65%	10,750
St. of Juan de Fuca	20%, 40%, 60%	7,000

***Variable MFMT based on abundance status and changes in assumed MSH escapement**

Sincerely,



Craig Bowhay, Fishery Services
Northwest Indian Fisheries Commission



Pat Patullo, Special Assistant to the Director
Department of Fish and Wildlife