

COUNCIL STAFF COMMENTS ON THE PUBLIC REVIEW DRAFT SOUTHERN  
OREGON-NORTHERN CALIFORNIA COAST COHO RECOVERY PLAN

Council Staff has prepared comments on the Public Review Draft Recovery Plan for Endangered Species Act (ESA) Listed Southern Oregon/Northern California Coast (SONCC) coho.

These comments focus primarily on the identified threats and stressors relative to the proposed recovery actions. The SONCC Coho Recovery Plan appropriately focuses on human caused threats in the freshwater and estuarine environment. The Recovery Plan does a relatively good job of linking recovery measures to identified threats; however, there are some areas that need further development. In particular, the lack of stressors other than harvest in the ocean environment is a shortfall of the analysis. The ocean environment has a dramatic effect on salmon abundance and productivity, and the Recovery Plan appears to largely overlook this. At a minimum, the effects of climate change and predation in the ocean environment should be considered.

Overall, it appears that the threats and stressor matrix ranks harvest effects as a greater threat to recovery of SONCC coho than can be supported by the available data or the recovery actions. For example, harvest effects are considered a medium threat and medium stressor for all SONCC populations, regardless of the intensity of freshwater fisheries among basins. This appears to be a blanket classification based on professional judgment of the Recovery Team.

The only actions identified in the Recovery Strategy sections related to harvest are to determine impacts of fisheries management on SONCC coho salmon in terms of viable salmonid population (VSP) parameters and to identify fishing impacts expected to be consistent with recovery. The implication seems to be that because the current ESA consultation standard was developed before the VSP parameters were established, it is inadequate and harvest is an impediment to recovery, even though actual impacts to SONCC coho have generally been far less than the allowable 13 percent ocean exploitation rate. The Recovery Plan does not provide any insight as to what VSP parameters would be appropriate or what level of harvest impacts would be consistent with recovery.

Specific comments are attached in the format requested by the National Marine Fisheries Service.

Chapter	Section	Page	Line	Comment
Keys		7		Fisheries are not listed as a threat here but are in Chapter 3.
Keys		7,9		What is the basis for abundance criteria and how do they relate to $S_{MSY}$ ?
3	3.1.10	32		Figure 3-2 only goes through 2000, ignoring recent population increases. Information to update that graph is available in PFMC documents.
3	3.1.10	32	12,13	This sounds like the ESA consultation standard for freshwater fisheries is <13% ER.
3	3.1.10	34		Table 3-7 should be labeled Trinity River coho harvested...
3	3.1.10	34		Table 3-7 footnotes are difficult to interpret and probably not the best way to breakout harvest components.
3	3.1.10	34,35	21	Text states there are several reasons why harvest would have negative effects but only states adults are valuable. Need specific reasons and need to put value in context of allowable exploitation rates.
3	3.2.12	64	27	Hook and release mortality impacts are generally higher in recreational and commercial fisheries south of Humbug Mt.
3	3.2.12	65	15	Correct terminology is Rogue Klamath (RK), not Klamath Rogue (KR).
3	3.2.13	66	17	While regulatory mechanisms are mentioned in 3.2.12, no statement of adequacy was made. It would help the Council to know if their management process was considered deficient or not.
4	4.1.3	11	B	The criteria only say harvest consistent with SONCC coho recovery but never define what that is or if the current standards are adequate.
5	5.1.1	20	12,13	The monitoring plan indicates that spawner abundance will only be estimated at the LCM streams, which is 7 out of 45 populations, and that the transition to the intermediate phase will occur when 50% of the LCM meet the low risk criteria. This level of monitoring is inadequate assess ESU level progress and to validate appropriate abundance criteria.
5	5.1.2	31,32		Tables 5-7 and 5-8 indicate spawning, rearing, and migration are only assessed once in the initial survey. This seems inadequate for a baseline given the isolation of generations and variability inherent in salmon populations.
5	5.3	40	11,12	Redundant sentence.
6	6.2.1	2	36	There is no explanation of what harvest constraints/approaches are consistent with recovery.
B	B.6	10,11		Seems incongruous that hatchery effects are a high threat but a low stressor.
B	B.6			Need more detail on how professional judgment arrived at certain conclusions, such as harvest is medium threat and stressor.
B	B.6	11	4-12	Redundant to paragraph above.
B	B.6	11,12		Statement that no empirical data on harvest impacts seems hard to believe. Also, paragraph goes on to describe Climate change and estuary function but doesn't mention fishery effects or hatchery effects (see next comment).
B	B.6	17	16-24	Although not mentioned above, there is a subsequent section titled fishery related effects, but only hatchery effects are described. Need to retitle this section and add one on fishery effects. There is no supporting information for the classification of fishery threats and stresses.

PFMC  
03/16/12