INDEPENDENT MULTIDISCIPLINARY SCIENCE TEAM (IMST)

State of Oregon

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March 22, 1999

Jim Greer, Director
Oregon Dept of Fish & Wildlife
PO Box 59
Portland, OR 97207

Dear Mr. Greer,

I write to you on behalf of the Independent Multidisciplinary Science Team (IMST) because ODFW represents the State of Oregon to the Pacific Fisheries Management Council (PFMC). We find that three aspects of the salmon management options proposed by the PFMC for 1999 are not scientifically compatible with recovery of OCN coho stocks and the Oregon Plan. The proposals include:

1. a selective recreational fishery for coho with missing adipose fins along the Oregon coast from Cape Falcon to Humbug Mountain,

2. increased quotas for coho salmon in troll fisheries north of Cape Falcon, and

3. a commercial troll fishery for chinook salmon south of Cape Falcon during July.

All of these fisheries will increase the mortality of these depressed OCN coho stocks, and there is a high degree of scientific uncertainty of the impacts of the management options on them. The scientific basis for our recommendations is that:

1. OCN coho stocks are at record lows. Many stocks are not replacing themselves. The year-class of OCN coho that will be impacted by the 1999 fisheries have declined during the past two brood cycles, 1993 and 1996. Imposing additional sources of mortality on stocks that are approaching record low numbers is not scientifically compatible with the Oregon Plan.

2. The North and North Central components of the OCN coho are especially depressed. Any additional impact on these stocks would increase the risk of extinction. Area closures will not protect these weak stocks because they are mixed with other OCN components at other locations where fishing is being proposed.

Although all coho with intact adipose fins would be released, hooking mortalities from a selective recreational coho fishery along the coast and an early chinook fishery are uncertain. Recent studies suggest they may be higher than predicted, exacerbating impacts to OCN coho.

4. The models upon which these fisheries are based are imprecise. Predictions have wide confidence intervals. For example, the total OCN stock abundance was over-predicted by more than 100% for the past two years. Recent projections of stock abundance generally have overestimated the status of the stocks. This lack of precision in estimates does not provide the scientific reliability for optimistic predictions about the lack of impact of additional sources of mortality.

5. Numbers of returning coho spawners in several coastal basins are in the range of 100-1000 individuals. Such extremely low populations are approaching levels where extinctions are likely. Harvest on such stocks is certain to increase the probability of extinctions.

6. Approximately half of the coho populations in the lower Columbia River are either extirpated or at risk of extirpation. Only two wild stocks remain intact-those that spawn in the Clackamas and Sandy Rivers, and these are being considered for listing under the ESA. Increases in the harvest of marked coho salmon in the proposed recreational fisheries (north of Cape Falcon and at Buoy 10 in the Columbia River) will increase the threat to these two Columbia River stocks, and to the severely depressed OCN coho stocks in the Tillamook and other north component basins.

In our previous correspondence with PFMC, the IMST recommended a conservative approach. We find the "precautionary principle" in Executive Order 99-01 consistent with this approach (i.e., if the risk of an action is great or the uncertainty is high, be conservative-do no harm).

In summary, the IMST recommends that:

1) The State of Oregon encourage the PFMC to adopt the goals of Amendment 13 ("to remove the fishery related impacts as a significant impediment to the recovery of depressed OCN coho and to allow rebuilding of the component populations subgroups to higher levels"). Amendment 13 also states: "If some components begin rebuilding faster than others, but data are not available which allows the marine harvest of OCN components at different rates, opportunities for increased ocean harvests may be constrained by the weakest component. In the foreseeable future, the northern stock component can be expect to dictate low harvest levels in marine fisheries for all components."

2) The State of Oregon encourage the PFMC to adopt
   - the recreational fishery option III (no selective fishery south of Cape Falcon),
   - troll option III north of Cape Falcon, and
   - troll option II south of Cape Falcon (however, we believe eliminating the July portion of this fishery south of Cape Falcon provides a stronger scientific basis for limiting the impact on OCN coho stocks).

To reiterate, the IMST does not consider the current scientific basis adequate to support a fishery that will impact OCN coho stocks. We believe such a fishery is not scientifically compatible with the goals of the Oregon Plan.

Sincerely yours,

Logan A. Norris
Chair, IMST

Cc: Governor Kitzhaber
President Adams
Speaker Lindquist
JLCSRSR
Larry Six, Pacific Fisheries Management Council
Roy Hamilton, Manager, Oregon Plan