



**CCA**

COASTAL CONSERVATION ASSOCIATION  
WASHINGTON

February 22, 2011

William W. Stelle, Jr.  
Regional Administrator  
National Marine Fisheries Service  
7600 Sand Point Way NE  
Seattle, WA 98115-0070

Subject: Comments on the proposed Population Recovery Approach for prioritizing Puget Sound Chinook salmon populations announced by the National Marine Fisheries Service in the December 29, 2010 Federal Register (75 FR 82208 (2010-12-29))

Dear Mr. Stelle:

We commend the National Marine Fisheries Service's (NMFS) decision to extend the public comment period to February 22, 2011 concerning the Population Recovery Approach (PRA) for prioritizing Puget Sound Chinook salmon populations. Please accept these comments on behalf of Coastal Conservation Association (CCA) Washington.

While we understand NMFS' desire to develop a PRA, we believe the current approach contains errors and inconsistencies that deserve correction. As you know, CCA Washington recently joined several other organizations raising concerns about NMFS' proposed assessment and determination of the Puget Sound Chinook Harvest Resource Management Plan (RMP). While the PRA is deeply embedded and aligned with the pending RMP decision, we believe NMFS should carefully consider the concerns raised by a number of organizations and reinitiate development of the PRA in an open and inclusive manner. While the RMP, if adopted, may only be in place for a relatively short amount of time, the PRA may have a more lasting effect.

As drafted, the PRA is a departure from NMFS' 2006 Supplement to the Puget Sound Chinook Recovery Plan. The first delisting criterion in the NMFS Supplement is that all 22 remaining Chinook populations in the Ecologically Significant Unit must improve. The PRA emphasizes a new strategy, p. 3, "preserve all and restore the best." There is value in adopting a rational and practical system for allocating limited salmon recovery effort and resources to the most appropriate watersheds. However, the PRA as drafted fails to appropriately recognize opportunities for recovery in several watersheds and prioritizes efforts toward recovery in other watersheds where runs are functionally extinct. These inconsistencies require correction.

For example, the proposed PRA ranks the Green River Chinook population at the lowest value available as a "Tier 3" watershed. This ranking is inconsistent with the Green's

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regional importance as a native fall Chinook population and the relatively high numbers of natural-origin Chinook escapements. In fact, of all Puget Sound Chinook stocks the Green has averaged second in the number of natural-origin spawners. These two strengths are likely one of the reasons State and Tribal co-managers identified the Green as a “Category 1” population in the proposed RMP. While we have concerns with the levels of harvest called for in the RMP, this “Category 1” designation denotes recognition of the importance of conserving this population. Meanwhile, NMFS’ PRA comes to an entirely different conclusion in its “Tier 3” ranking.

Another concern is NMFS’ “Tier 3” ranking of the Cedar River Chinook salmon population. Again, we believe this ranking is inconsistent with the quantity and quality of spawning escapements and upstream habitat in the Cedar. In fact, the spawning escapements to the Cedar are primarily of natural-origin, unlike other nearby rivers in the south sound and Hood Canal where hatchery-origin fish dominate escapements. It is also important to take into account the 17 miles of new high-quality spawning and rearing habitat that has recently become available above Landsburg Dam. Considerable data has been collected by Universality of Washington scientists demonstrating that habitat above Landsburg is very productive for Chinook. Once again, State and Tribal co-managers identified the Cedar as a “Category 1”, but NMFS has proposed a “Tier 3” ranking for this system.

These and other inconsistencies deserve consideration and correction. If NMFS intends to move forward with the PRA, it is critical that it take the significance and performance of local salmon populations into account. The PRA will send a powerful message to private and public entities regarding the relative value of individual populations. A “Tier 3” ranking will likely lead the public to believe so ranked populations are less worthy of continued recovery efforts. In the case of the Cedar River, the tier 3 ranking could suggest that severe limitations on Sockeye salmon brood stock collection can be significantly relaxed, which may further threaten this stock. A “Tier 3” ranking of the Green ignores the value of natural-origin Chinook returning to that system. We understand similar discrepancies also exist elsewhere in NMFS’ rankings, including of the Snohomish system.

In summary, it appears that NMFS has relied too heavily on its perception of the quality of habitat and undervalued the importance of spawner composition, natural-origin production and more recent habitat actions in ranking river systems. We request, given the serious policy and technical concerns regarding the PRA, that NMFS delay adoption of the proposed PRA and better coordinate with the co-managers, local salmon recovery entities and the public in developing a workable approach.

Thank you for considering our comments.

Sincerely,



Andrew E. Marks, Vice-Chair  
CCA Governmental Relations Committee

CC: Garth Griffin, NMFS