STRAIT OF JUAN DE FUCA NATURAL COHO

SALMON REBUILDING PLAN,
ENVIRONMENTAL ASSESSMENT,
MAGNUSON-STEVENS FISHERY CONSERVATION AND MANAGEMENT ACT ANALYSIS,
REGULATORY IMPACT REVIEW, AND
REGULATORY FLEXIBILITY ANALYSIS

REGULATORY IDENTIFIER NUMBER 0648-BJ05

PLEASE NOTE: THIS IS AN INTEGRATED DOCUMENT DESIGNED TO MEET THE NEEDS OF THE PACIFIC FISHERY MANAGEMENT COUNCIL'S PACIFIC SALMON FISHERY MANAGEMENT PLAN AND PROVIDE THE ENVIRONMENTAL ANALYSIS REQUIRED UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT.

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LIST OF ACRONYMS AND ABBREVIATIONS

ABC	acceptable biological catch
BY	brood year
CoTC	Coho Technical Committee (of the PSC)
Council	Pacific Fishery Management Council
CWT	coded-wire tag
EA	Environmental Assessment
EEZ	exclusive economic zone (from 3-200 miles from shore)
ESA	Endangered Species Act
ESU	evolutionarily significant unit
F_{ABC}	exploitation rate associated with ABC
F_{ACL}	exploitation rate associated with ACL (= F_{ABC})
FMP	fishery management plan
F_{MSY}	maximum sustainable yield exploitation rate
F_{OFL}	exploitation rate associated with the overfishing limit (= F_{MSY}, MFMT)
FONSI	Finding of No Significant Impacts
FRAM	Fishery Regulatory Assessment Model
MFMT	maximum fishing mortality threshold
MSA	Magnuson-Stevens Fishery Conservation and Management Act
MSST	minimum stock size threshold
MSY	maximum sustainable yield
NA	not available
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NPGO	North Pacific Gyre Oscillation
NS1G	National Standard 1 Guidelines
OFL	overfishing limit
OY	Optimum Yield
PDO	Pacific Decadal Oscillation
PFMC	Pacific Fishery Management Council (Council)
PSC	Pacific Salmon Commission
PST	Pacific Salmon Treaty
RER	rebuilding exploitation rate
S_{ABC}	spawning escapement associated with ABC
S_{ACL}	spawning escapement associated with ACL (= S_{ABC})
S_{MSY}	MSY spawning escapement
S_{OFL}	spawning escapement associated with the overfishing limit (= S_{MSY})
STT	Salmon Technical Team
WDFW	Washington Department of Fish and Wildlife

1.0 EXECUTIVE SUMMARY

Strait of Juan de Fuca natural coho salmon (JDF coho) met the criteria for overfished status in 2018 as defined in Section 3.1 of the Pacific Coast Salmon Fishery Management Plan (FMP). In response, the Pacific Fishery Management Council (Council) directed the Salmon Technical Team (STT), in coordination with relevant state and tribal comanagers, to develop a rebuilding plan for Council consideration within one year. This report represents the JDF coho rebuilding plan and includes requirements described in section 3.1.4.1 of the FMP, including: (1) an evaluation of the roles of fishing, marine and freshwater survival in the overfished determination, (2) any modifications to the criteria for determining when the stock has rebuilt, (3) recommendations for actions the Council could take to rebuild the stock, and (4) specification of the rebuilding period.

Section 3 describes the evaluation of potential factors that led to the overfished status. The analysis found that ocean conditions, as reflected in marine survival rates, drive the abundance of JDF coho more than any other factor. The evaluation also identified that, due to effects of land management activities such as logging and agriculture, freshwater productivity may be a chronic problem that, when coupled with recent poor marine conditions, has reduced the productivity of the stock. It is unlikely that stock assessment or fishery management error played a significant role in the overfished status of JDF coho, as fishery exploitation rates were consistently low.

Section 4 provides recommendations for action in this rebuilding plan, including (1) the rebuilt criterion, (2) fishery management strategies to be employed during the rebuilding period, (3) comanager recommendations for re-examination of management reference points and further investigation into habitat issues, and (4) an analysis of rebuilding times. Estimates of rebuilding time ranged from a T_{MIN} of four years to six years under the status quo alternative. An analysis of the socio-economic impacts of management strategy alternatives is presented in Section 5. Section 6 presents an analysis of the environmental impacts of the alternative rebuilding strategies, as required under the National Environmental Policy Act (NEPA).

This rebuilding plan was adopted as draft for public review at the June 2019 Council meeting in San Diego, California. At the September 2019 meeting in Boise, Idaho the Council adopted the rebuilding plan as final, with the following decisions: (1) maintain the default criterion for achieving rebuilt status as defined in the FMP, (2) identification of Alternative I (status quo) as the preferred management strategy alternative.

2.0 INTRODUCTION

In 2018, Strait of Juan de Fuca natural coho salmon (JDF coho) met the criteria for overfished status as defined in section 3.1 of the Pacific Coast Salmon Fishery Management Plan (FMP, (PFMC 2016). In response, the Pacific Fishery Management Council (Council) directed the Salmon Technical Team (STT) to propose a rebuilding plan for Council consideration within one year. The FMP, and the Magnuson-Stevens Fishery Conservation and Management Act (MSA), requires that a rebuilding plan must be developed and implemented within two years of the formal notification from National Marine Fisheries Service (NMFS) to the Council of the overfished status. Excerpts from the FMP relevant to status determinations and rebuilding plans are provided in Appendix A.

The Council's criteria for overfished is met if the geometric mean of escapement, computed over the most recent three years, falls below the Minimum Stock Size Threshold (MSST) which is defined for applicable stocks in Table 3-1 of the FMP. For JDF coho, the number of adult spawners expected to produce maximum sustainable yield (MSY) is defined as 11,000 natural-area adult spawners, also known as S_{MSY}. The MSST for JDF coho is defined as 7,000 natural-area adult spawners. The geometric mean of JDF coho natural-area adult spawners over years 2014-2016 was 6,842, and thus in 2018 the stock met the criteria for overfished status[1]. Figure 2.0.a. displays the time series of JDF coho natural-area adult escapement and the running three year geometric mean of escapement relative to S_{MSY} and the MSST. Table 2.0.a. includes both hatchery and natural spawning escapement and displays the co-manager agreed to values as of the April 2018 PFMC Meeting. The FMP identifies the default criterion for achieving rebuilt status as attainment of a 3-year geometric mean of spawning escapement exceeding S_{MSY}.

Overfished status is defined by recent spawner escapement for salmon stocks, which is not necessarily the result of overfishing. Overfishing occurs when in any one year the exploitation rate on a stock exceeds the maximum fishing mortality threshold (MFMT), which for JDF coho is defined as the MSY fishing mortality rate (F_{MSY}) of 0.60. It is possible that overfished status could represent normal variation, as has been seen in the past for several salmon stocks. However, the occurrence of reduced stock size or spawner escapements, depending on the magnitude of the short-fall, could signal the beginning of a critical downward trend. Imposing fisheries on top of already low abundances could further jeopardize the capacity of the stock to produce MSY over the long term if appropriate actions are not taken to ensure that conservation objectives are achieved.

In this rebuilding plan, we begin by providing an overview of the JDF coho stock, the physical setting of the Strait of Juan de Fuca and its tributaries, and fisheries management. We then review the potential factors that may have contributed to the overfished status. Recommendations regarding alternative rebuilding actions are proposed, as are recommendations for actions outside of the management of salmon fisheries. We end with a socioeconomic and environmental analysis of the impact of the recommended rebuilding alternatives.

[1] Subsequent to publishing the Review of 2017 Ocean Salmon Fisheries, revised escapement estimates for JDF coho were provided in mid-August 2018 which indicate the stock may in fact not have been in an overfished status. These revised escapement estimates were 11,489, 3,859, and 8,435 for 2014, 2015, and 2016 respectively, bringing the three year geometric mean to 7,205, which is above the MSST of 7,000. Preliminary escapement estimates for 2017 (see table 2.0.a), however, suggested the stock is almost certain to be in an overfished status in 2018. Given this information, the STT continued with the development of the rebuilding plan for JDF coho as instructed by the Council, and has updated all salmon data in the Review of 2018 Ocean Salmon Fisheries.

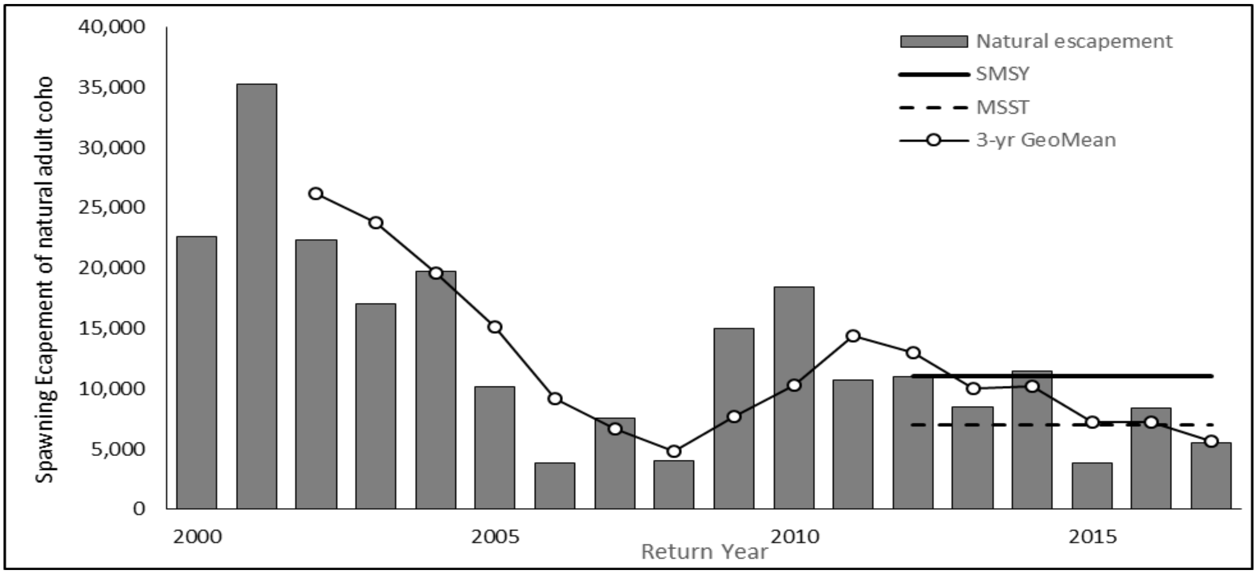

Figure 2.0.a. JDF coho spawning escapement of natural area adults. The current MSST took effect in 2012, at which point the most recent 3-yr geometric mean included escapement in 2008-2010.

Table 2.0.a. Juan de Fuca coho adult natural spawning escapement (200-2017).

Year	Spawning escapement (natural)	Three-year geometric mean
2000	22,654	
2001	35,274	
2002	22,375	26,149
2003	17,042	23,782
2004	19,755	19,603
2005	10,201	15,087
2006	3,801	9,150
2007	7,525	6,633
2008	3,999	4,854
2009	14,957	7,664
2010	18,419	10,328
2011	10,731	14,352
2012	11,020	12,963
2013	8,458	10,001
2014	11,488	10,231
2015	3,859	7,211
2016	8,435	7,204
2017	5,530	5,646

2.1 Magnuson-Stevens Fishery Conservation and Management Act

The following is a review of NMFS' MSA National Standard 1 (NS1) guidelines regarding rebuilding plans (50 CFR 600.310(j)), and how these guidelines interface with the salmon FMP (e.g., required elements T_{target}, T_{min}, and T_{max}).

NMFS has developed guidelines for complying with the NS1 provisions of section 301 of the MSA (50 CFR 600.310). Under these guidelines, rebuilding plans must include the following elements; including these elements in rebuilding plan alternatives allows the Council to make an informed decision on adopting rebuilding plans.

T_{target}: the target time for rebuilding the fishery in as short a time as possible, taking into account the status and biology of the overfished stock, the needs of the fishing communities, recommendations by international organizations in which the United States participates, and the interaction of the overfished stock of fish within the marine ecosystem.

T_{MIN}: the amount of time the stock is expected to take to rebuild to MSY biomass level in the absence of any fishing mortality ("expected" means to have at least a 50 percent probability of attaining MSY, where such probabilities can be calculated). Note that, for salmon, we use spawning escapement for biomass, so the MSY biomass level is termed S_{MSY} in salmon rebuilding plans.

T_{MAX}: the maximum time for rebuilding a stock to B_{MSY} (S_{MSY} for salmon). If T_{MIN} is less than 10 years, T_{MAX} is 10 years.

To be approved, a rebuilding plan must identify T_{target} and state how the plan will accomplish rebuilding to S_{MSY} within that time (e.g., the identified harvest strategy).

To estimate T_{MIN}, an impact rate of zero is assumed, meaning all fisheries affecting the stock would cease until the stock was rebuilt. Because the Council does not have jurisdiction over tribal, in-river, and other fisheries that may impact the stock, a 'no-fishing' alternative is not a viable option for the Council to consider. Also, a 'no-fishing' alternative does not meet the purpose and need (see section 2.2.2, below) because it would restrict tribal fisheries in a manner that is inconsistent with their treaty right.

However, because T_{MIN} does serve as a bookend in the analysis of rebuilding probabilities over a ten year period when assuming an exploitation rate of zero, this 'T_{MIN} scenario' fulfills the requirement of National Standard 1 in calculating the minimum time (T_{MIN}) estimated to achieve rebuilt status. It is for this purpose only that the 'T_{MIN} scenario' is included in this document (See Sections 4 and 5).

2.2 National Environmental Policy Act

In addition to addressing the requirements of the FMP and MSA, this rebuilding plan document integrates the environmental assessment required under the National Environmental Policy Act (NEPA). This EA was prepared using the 1978 CEQ NEPA Regulations. NEPA reviews initiated prior to the effective date of the revised CEQ regulations may be conducted using the 1978 version of the regulations. The effective date of the 2020 CEQ NEPA Regulations was September 14, 2020. This review began on September 21, 2018 and the agency has decided to proceed under the 1978 regulations.

2.2.1 Proposed action

The Proposed Action is for the Council to adopt and NMFS to approve a rebuilding plan for the JDF coho salmon stock, which has been determined by NMFS to be overfished under the MSA. The rebuilding plan must be consistent with the MSA and the provisions of the FMP; therefore, the plan shall include a control rule and a specified rebuilding period. The specified rebuilding period shall be as short as possible, taking into consideration the needs of the commercial, recreational and tribal fishing interests and coastal communities.

2.2.2 Purpose and need

The purpose of the proposed action is to develop and implement a harvest control rule that will be applied to setting annual ocean salmon fishery management measures that impact JDF coho to allow the stock to attain a three-year geometric mean spawning escapement that meets the S_{MSY} specified for that stock in the FMP in the least amount of time possible while taking into account the biology of the stock, international agreements, and the needs of fishing communities, but not to exceed 10 years. The need for the proposed action is to rebuild JDF coho, which the National Marine Fisheries Service determined, in 2018, to be overfished under the MSA.

2.3 Stock overview

The JDF coho stock managed under the FMP is synonymous with the Strait of Juan de Fuca Management Unit (MU) managed under the Pacific Salmon Treaty (PST) between the United States and Canada. Management information on these coho comes predominately from the Pacific Salmon Commission's Coho Technical Committee (CoTC). The Strait of Juan de Fuca MU is one of thirteen key MUs defined in the PST for naturally spawning coho stocks (PSC 2009) and consists of natural coho salmon inhabiting the numerous streams and tributaries draining from the Olympic Peninsula northward into the Strait of Juan de Fuca, with the exception of the Dungeness and Elwha Rivers. This MU spans two evolutionarily significant units (ESUs), as defined by NMFS. Populations inhabiting the western Straits (from Salt Creek westwards) are part of the Olympic Peninsula ESU, while those east of Salt Creek belong to the Puget Sound/Strait of Georgia ESU (Weitkamp et al. 1995). The Puget Sound/Strait of Georgia ESU is currently a species of concern under the U.S. Endangered Species Act (NOAA Fisheries 2009).

2.3.1 Stock composition

Both natural and hatchery coho salmon are found in the streams and tributaries of the JDF region, however, the JDF coho stock referred to throughout this document refers specifically to the naturally produced salmon only.

Several salmon hatchery facilities are located within the area that encompasses the JDF coho stock. Below is a list of those programs that rear and release coho salmon.

- The Lower Elwha Fish Hatchery, operated by the Lower Elwha Klallam Tribe, is located at river mile (RM) 1.25 on the Elwha River. The current coho program at this facility is an "integrated" program (broodstock is genetically integrated with the local natural population) with the goal of preserving and rebuilding natural coho production in the Elwha River by supplementing the abundance of juvenile and, therefore, returning adult fish. Long term goals include re-colonization of suitable coho spawning and rearing habitat and enhanced in-river terminal harvest opportunities. The program currently has an annual production goal of 425,000 smolts to be released at the hatchery site (on-station). Of the total smolts released, 350,000 smolts are marked (adipose fin clipped), and 75,000 smolts are unmarked, but are coded-wire tagged as part of a double index tag group to estimate impacts of selective fisheries.

- The Dungeness Hatchery operated by Washington Department of Fish and Wildlife (WDFW) is located on the Dungeness River at RM 10.5. The current coho program at this facility is a “segregated” program (broodstock is genetically segregated from the local natural population) with the goal of providing fish for sport and commercial harvest. The program currently has an annual production goal of 500,000 smolts to be released at the hatchery site (on-station). In addition, 2,000 fry are planted into Cooper Creek, and up to 1,900 eyed eggs are transferred to local school projects.
- The Hurd Creek Hatchery operated by WDFW is located on Hurd Creek, a tributary to the Dungeness River at RM 3. The facility began operating in 1980 and its only coho programs are supplying small numbers of eggs to educational and other organizations.
- The Hoko River Hatchery operated by the Makah Tribe is located at river mile 9.6. It does not currently have a coho program, but is considering establishing one to provide harvest opportunity in the river and adjacent salt water areas.

The Elwha and Dungeness Rivers have hatcheries and are managed for hatchery production, therefore natural spawning in these rivers is not included as part of the JDF coho stock. Natural spawners in the Elwha and Dungeness Rivers are considered "secondary" stocks, passively managed in mixed stock fisheries (CCW 1998).

2.3.2 Location and geography

The Strait of Juan de Fuca lies between the Olympic Peninsula of Washington State and Vancouver Island of British Columbia, Canada with the international boundary lying mid-channel (Figure 2.2.2.a).

Strait of Juan de Fuca coho inhabit an area of approximately 1,500 mi^2, including some 48 independent watersheds that support coho ranging in size of basin from less than 10 mi^2 to more than 300 mi^2. These watersheds drain northward into the Strait from Cape Flattery in the west to Point Wilson in the east, and south along the east side of the Quimper Peninsula to include Chimacum Creek.

This region consists of numerous small to large tributaries draining the Olympic Mountain range and surrounding foothills. The western portion of the Strait of Juan de Fuca MU (WSJF) encompasses waters emptying to the Strait of Juan de Fuca west of the Elwha River, to the tip of Cape Flattery. The WSJF contains 27 salmonid-bearing watersheds that drain directly into the Strait of Juan de Fuca. The largest sub basin within the watershed is the Hoko River, followed by the Lyre, Pysht, Sekiu, and Clallam Rivers (Smith 1999). The eastern portion of the Strait of Juan de Fuca MU includes all streams and rivers from the Elwha River east to Chimacum Creek.

The climate varies widely throughout the region, with higher annual precipitation to the west and at higher elevations. Annual rainfall decreases dramatically from west to east across the region, due to the rain-shadow effect of the Olympic Mountains. The eastern portion of the region receives as little as 15 inches [38 cm] of rain a year, increasing to over 85 inches [216 cm] in the western portion.

The estuarine habitat in the region is somewhat transitional between the more sheltered inland estuaries of inner Puget Sound and the open Pacific Ocean, with decreasing shallow, sheltered marine habitat encountered moving westward from inner Puget Sound.

Much of the freshwater habitat in the region is managed for commercial timber production, though the upper reaches of the longer tributaries in the region around the Elwha River originate in Olympic National Park. The main population centers of Sequim and Port Angeles are located in the eastern portion of the region. Urbanization, agricultural activities, and water withdraws have degraded the productivity of streams in these areas, with the exception of the upper reaches of the longer tributaries that originate in Olympic National Park.

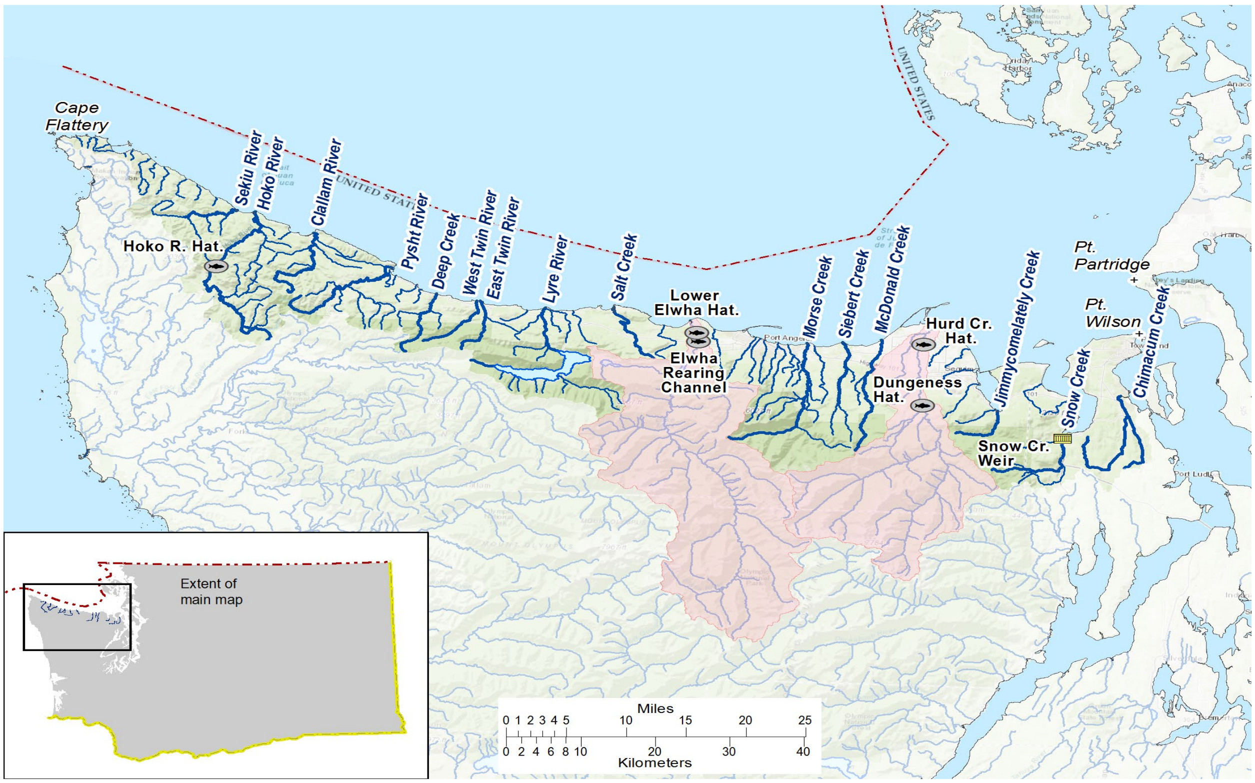

Figure 2.2.2.a. Map of Strait of Juan de Fuca Coho Management Unit (Dale Gombert, WDFW Science Division). The Elwha and Dungeness Rivers are shown shaded but not bolded because, though part of the MU, they are not "primary" management units under the Comprehensive Coho Management Plan (CCW 1998).

2.4 Management overview

Strait of Juan de Fuca coho are one of five Puget Sound coho management units included in the coho chapter of the Pacific Salmon Treaty (PST). Under the PST, Puget Sound management units are managed under a tiered, abundance-based management regime. Each year, the management units are classified as "low" abundance, "moderate" abundance, or "abundant" based on the forecast ocean abundance of age-3 fish (CoTC 2013). The maximum allowable exploitation rate (ER) is determined by the abundance category (Table 2.3.a).

Table 2.3.a. Pacific Salmon Treaty-defined total exploitation rate ceilings by PSC status categories.

Strait of Juan de Fuca natural coho		
Status (PSC/Council)	Ocean Age-3 Abundance Reference Point	Total Exploitation Rate
Low	≤ 11,679	Up to 20%
Moderate	11,680 – 27,445	21% – 40%
Abundant	> 27,445	41% – 60%

2.4.1 Conservation objectives

The abundance-based stepped harvest rates of the PST management regime were adopted as conservation objectives for Puget Sound coho MUs by the Council in November 2009 (Bowhay and Pattillo 2009), and implemented in the 2010 preseason planning process. When the Council adopted Amendment 16 in 2011, the spawning escapements associated with the ocean abundance breakpoints were adopted as status determination criteria (SDC). For JDF coho, the MSST of 7,000 was adopted based on the spawning escapement associated with the Low/Moderate breakpoint and 40 percent allowable ER. Similarly, the S_{MSY} value of 11,000 was adopted based on the spawning escapement associated with the moderate/abundant breakpoint and the 60 percent allowable ER. Amendment 16 to the FMP was implemented starting with the 2012 preseason planning process.

2.4.2 Management strategy

The tiered harvest rates with abundance breakpoints define a control rule that limits the allowable fishery impacts on JDF coho depending on the abundance. However, fisheries impacting JDF coho are also constrained by impacts on other coho management units identified in the Pacific Salmon Treaty, impacts on discrete population segments listed under the U.S. Endangered Species Act, harvest sharing obligations adjudicated by the Boldt decision (under the determinations of the U.S. District Court in *U.S. v. Washington*), and impacts on other salmon stocks identified in the FMP. Each year proposed management measures are modeled using the coho Fishery Regulation Assessment Model (FRAM) parameterized with the current year's stock abundance forecasts. Final management measures adopted by the Council need to meet all the constraints on stocks and fisheries.

Usually, constraints on fishery impacts to other stocks are more constraining to than those on JDF coho. Coho fisheries impacting JDF coho are constrained by the depressed status of Thompson River (upper Fraser River) coho in British Columbia. Since the mid-1990s, Canadian coho fisheries have been managed to minimize impacts on Thompson River coho, which greatly reduced their impacts on Washington coast and Puget Sound coho stocks. When the current coho chapter of the Pacific Salmon Treaty was adopted in 2002, it constrained the total exploitation rate in US fisheries on Thompson River coho to a maximum of 10% while they are in the low abundance category. This limit has constrained northern US coho fisheries in nearly every year since then.

Postseason, when actual catch and spawning escapement data can be used to parameterize the coho FRAM, management measures actions are assessed to see if the conservation objectives and status determination criteria were met.

3.0 REVIEW OF POTENTIAL FACTORS LEADING TO OVERFISHED STATUS

A number of factors may contribute to a stock falling below the MSST and becoming classified as overfished. Fishing mortality may be higher than was expected when management measures were adopted, or the abundance may be less than forecast. Abundance may be less than forecast because low freshwater survival resulted in fewer smolts than expected, or because low marine survival resulted in fewer adult returns than expected. Freshwater and/or marine survival may be low enough, that even if anticipated, there will simply be too few adults produced to prevent the stock from falling below the MSST, even in the absence of fishing. The FMP specifies that the roles of freshwater survival, marine survival, and fishing should be considered in any rebuilding plan.

3.1 Freshwater survival

3.1.1 Review of freshwater conditions

JDF coho distribution of freshwater habitat spans across the northern Olympic Peninsula, a distance of more than 100 miles wide, encompassing freshwater systems that are comprised of a wide variety of sizes, land uses, and ownership dynamics. Three different Water Resource Inventory Areas (WRIAs) planning areas are involved in resource management, WRIA 17, 18, and 19. Each containing very different social, economic, and ecological dynamics which impact freshwater habitat limiting factors.

In the 1997 Puget Sound Salmon Stock Report, it was argued that the JDF region had experienced some of the greatest impacts to freshwater habitat in Washington. Most of the habitat degradation is attributed to land management activities of logging and agriculture, as well as urbanization leading to extirpation of some stocks. Loss of habitat was also an issue due to fish blocking culverts (PFMC 1997).

Establishment of land management policies and enforcement since 1999 have helped improve habitat conditions in comparison to pre-1999 historic practices. For example, the Forest Practices Act, which guides the management of privately owned forest land, includes significant portions of land. Regulations such as this have helped increase riparian protections and introduce standards for protecting unstable slopes, as well as support proper road management practices. Despite these efforts legacy impacts from land management activities continue to plague the quality of freshwater habitat and negatively affect salmon productivity.

More than forty-five streams and rivers provide habitat for JDF coho spawners. Detailed, current information for each water body is not available, therefore a monitored creek in eastern Strait and two rivers[2] in the western portion of the Strait will serve as freshwater condition proxies during 2011-2015 (when the brood years in question were incubating and/or rearing in streams). Where available, 2016-2018 data was also included.

McDonald Creek is located between Siebert Creek and the Dungeness River, in the eastern portion of the JDF MU (see Figure 2.2.2.a for location). The headwaters originate at 4,700 feet and the

[2] In previous JDF overfishing reports, the Pysht River was used as a proxy of freshwater conditions in the western Straits. However in recent years, monitoring efforts have been minimized in the western Straits due to budgetary constraints and landowner cooperation. Streamflow monitoring sites have been discontinued in the Pysht River, which impacts the ability to assess conditions impacting survival during this reporting period.

high gradient headwaters flow through a deeply incised coastal upland and marine bluff before entering the Strait of Juan de Fuca.

The Hoko River and Clallam River are located between the Seiku River and the Pysht River, in the western portion of the JDF MU (see Figure 2.2.2.a. for location). It is a rain dominant watershed, averaging approximately 110 inches of precipitation annually. The distribution of the precipitation occurs predominantly during the fall and winter months, where daily events of 1-2 inches are common, and storm events of 4-7 inches occur as well. Overall large woody debris (LWD) conditions in the Hoko watershed are considered very poor, as the presence of existing LWD is low, as a result of systematic log jam removals through the 1970's. Also recruitment of large coniferous wood in riparian areas is absent, as a result of past harvest management activities (Haggerty, 2015). On average each river represents more than 10 percent of total coho spawners in the area from 2013-2016.

Maximum summer temperatures in McDonald Creek and the Clallam River, though above the temperature preference range for juvenile coho salmon, are within tolerable limits (Tables 3.1.1.a and 3.1.1.b) —water temperature data on the Hoko River is not available. Probably of greater significance are the low flows in the 2014-15 summer and fall months in this rain-dominant watershed (Table, 3.1.1.a-b; Figure 3.1.1.a). Low flows reduce the amount of available habitat, and can result in stranding of rearing juvenile coho.

Table 3.1.1.a. McDonald Creek (eastern Strait) water conditions.

	High Flows		**Low Flows**			
Year	**Months**	**Avg. CFS**	**Months**	**Avg. CFS**	**Avg Temp °C**	**Days above the highest avg of** 14°C
2011	Jan-May	50	July-Oct	3.3	10	3 days ≥ 15°
2012	Jan-April	44	Aug-Oct	2.4	12	15 days ≥ 15°
2013	No Data	-	Aug-Oct		12	3 days ≥ 15°
2014	Incomplete	-	June-Sept	3.3	14	41 days ≥ 15°
2015	Incomplete	-	June- mid-Dec	2.7	14	44 days ≥ 15°
2016	Incomplete	-	June-Sept	1.6	13	44 days ≥ 15°
2017	Jan-April	28	June-Sept	5.3	13	14 days ≥ 15°
2018	Jan-April	34	Incomplete	-	-	-
DATA SOURCE: Washington Department of Ecology https://fortress.wa.gov/ecy/eap/flows/station.asp?sta=18P070#block0						

Table 3.1.1.b. Clallam River (western Strait) water conditions.

	High Flows		**Low Flows**			
Year	**Months**	**Avg. CFS**	**Months**	**Avg. CFS**	**Avg Temp °C**	**Days above the highest avg of** 14°C
2011	Jan-April	266	July-Sept	14	12	0 days ≥ 15°
2012	Jan-April	263	Aug-Sept	11	12	0 days ≥ 15°
2013	Jan-April	192	July-Aug	11	14	0 days ≥ 15°
2014	Jan-April	247	June-Sept	6	14	43 days ≥ 15°
2015	Jan-April	204	June- Aug	5	14	14 days ≥ 15°
2016	Jan-March	375	May-Sept	14	13	0 days ≥ 15°
2017	Jan-April	284	Incomplete	-	-	-
2018	Jan-April	216	Incomplete	-	-	-
DATA SOURCE: Washington Department of Ecology. https://fortress.wa.gov/ecy/eap/flows/station.asp?sta=19H080#block0						

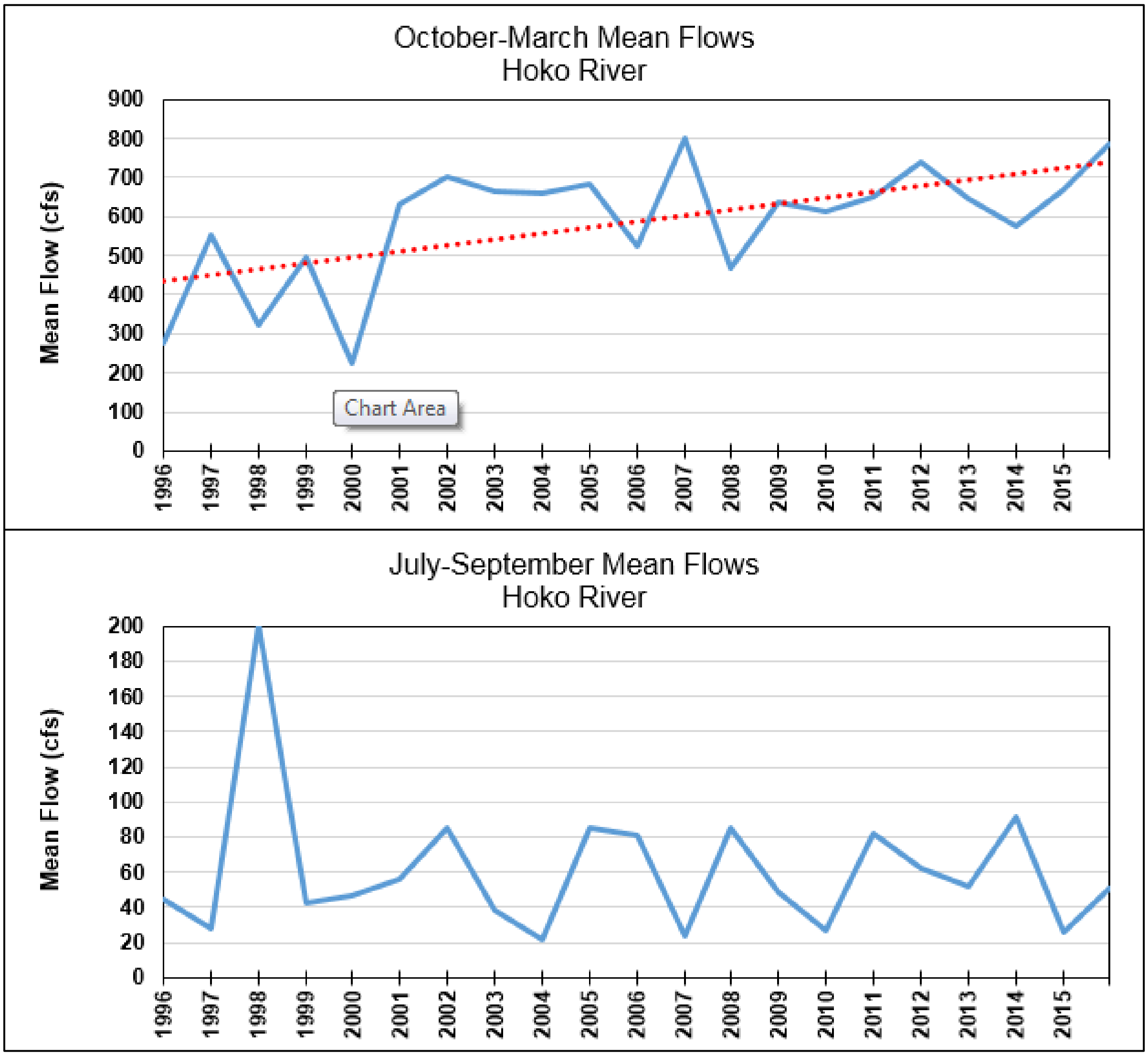

Figure 3.1.1.a. Hoko River (western Strait) water conditions from 1996-2015 across high flow (October-March) and low flow (July-September) months. A regression analysis (red dotted line) indicates statistical significance. The United States Geological Survey has monitored the Hoko River streamflow conditions periodically since 1963, which allows for suitable historic flow comparisons (temperature data is not available). Data can be found at https://waterdata.usgs.gov/usa/nwis/uv?12043300.

3.1.2 Juvenile production estimates

Coho salmon in Washington, Oregon, and California enter the ocean as smolts in the spring of their second year, and contribute to fisheries and spawning escapement as 3-year-olds the following calendar year. For JDF coho, smolt production estimates include only natural production with little or no hatchery influence. Hatchery production, as well as natural production from the Elwha and Dungeness Rivers are not included in the total smolt production data. Year classes contributing to the spawning escapements in 2014-2016 were from brood years 2011-2013, and migrated to sea as smolts in 2013, 2014, and 2015 (Figure 3.1.2.a).

Smolt production over the 1996-2015 brood years has ranged from a low of 180,000 in 2010 to a high of 421,000 in 2004. Production from the 2011 and 2012 brood years was above average, and though the production from the 2013 brood year was below average, the JDF coho stock still produced over 220,000 natural smolts that year (Table 3.1.2.a).

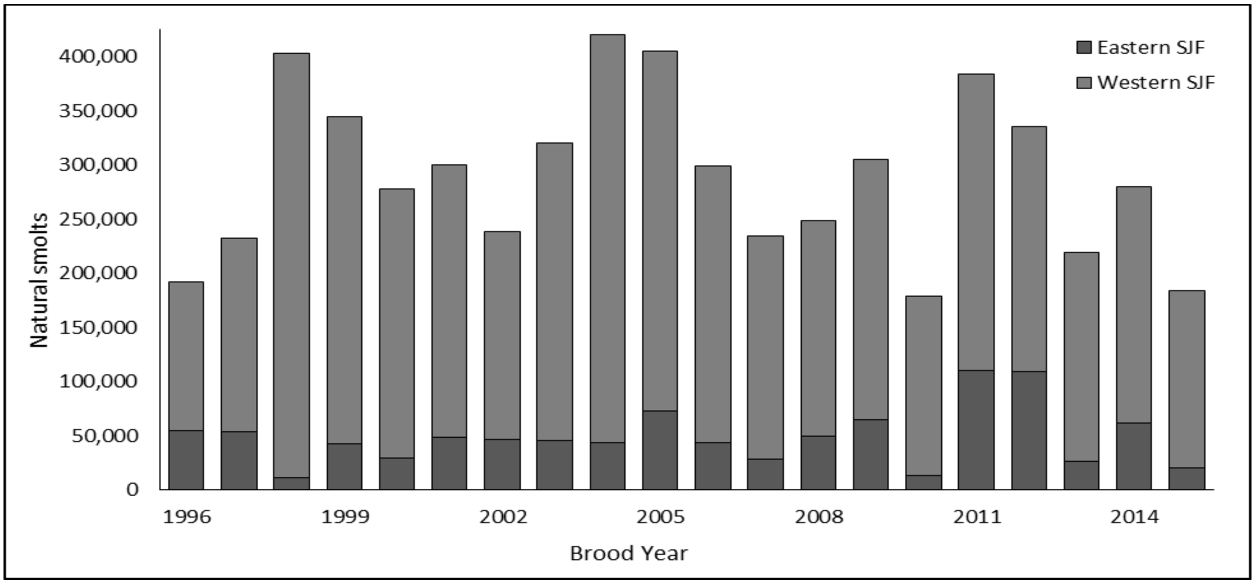

Figure 3.1.2.a. Natural smolt production of JDF coho by brood year.

Table 3.1.2.a. JDF coho natural smolt production. Estimates are expanded from trap counts and exclude natural production from the Elwha and Dungeness Rivers.

		Natural coho smolt production		
Brood year	Smolt year	Eastern Strait	Western Strait	Total
1996	1998	54,881	136,750	191,631
1997	1999	53,401	179,551	232,952
1998	2000	18,125	391,620	409,744
1999	2001	43,139	300,854	343,993
2000	2002	35,675	247,595	283,270
2001	2003	51,835	251,247	303,082
2002	2004	48,183	192,208	240,392
2003	2005	46,917	274,901	321,818
2004	2006	45,260	375,883	421,143
2005	2007	74,817	331,694	406,511
2006	2008	45,177	255,337	300,514
2007	2009	29,827	206,667	236,494
2008	2010	52,447	198,527	250,973
2009	2011	66,835	240,269	307,104
2010	2012	14,001	165,911	179,912
2011	2013	112,970	273,658	386,628
2012	2014	112,804	225,463	338,267
2013	2015	27,647	192,689	220,336
2014	2016	61,582	218,040	279,621
2015	2017	20,550	163,589	184,139

3.2 Marine survival

3.2.1 Review of ocean conditions

While the marine environment affects the survival of coho salmon during their entire marine residence, the most critical time period is shortly after they emigrate from fresh water as smolts.

Coho smolts entering the marine environment in Puget Sound are subject to very different conditions than coastal stocks, which enter more directly into the California Current ecosystem. Consequently, the marine survival of coho stocks that enter salt water in the inside waters of the Salish Sea show different patterns and trends than those of coastal stocks (Zimmerman et al. 2015). The Strait of Juan de Fuca is transitional between Puget Sound and the outer coast, with Western straits populations responding to marine environmental indices more like coastal stocks, and the Eastern straits population responding more like Puget Sound stocks.

Ecosystem indicators that have been associated with early marine survival of Chinook and coho salmon are displayed in Figure 3.2.1.a (Peterson *et al*. 2018). These indicators were selected based primarily on correlations with survival of Columbia River stocks, but are generally indicative of basin-wide marine conditions. Indicators related to the early marine survival of coho are generally related to adult coho abundance in the following year, so the years from 2013-2015 are associated with adult returns in 2014-2016. The mean ranks of indicators were generally neutral, but declining in 2013 and 2014, and have been negative since then. One noteworthy indicator is the catches of juvenile coho in the September surveys. These were highly correlated with coho returns in the following year, but the September surveys were discontinued in 2013, and are thus omitted from the mean ranks.

Ecosystem Indicators	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
	Year																				
PDO (Sum Dec-March)	18	6	3	13	7	20	12	16	14	9	5	1	15	4	2	8	10	21	19	17	11
PDO (Sum May-Sept)	10	4	6	5	11	17	16	18	12	14	2	9	7	3	1	8	19	21	20	15	13
ONI (Average Jan-June)	20	1	1	7	14	16	15	17	9	12	3	11	18	4	6	8	10	19	21	13	5
46050 SST (°C; May-Sept)	16	9	3	4	1	8	21	15	5	17	2	10	7	11	12	13	14	20	18	6	19
Upper 20 m T (°C; Nov-Mar)	20	11	8	10	6	15	16	12	13	5	1	9	17	4	3	7	2	21	19	18	14
Upper 20 m T (°C; May-Sept)	17	12	14	4	1	3	21	19	7	8	2	5	13	10	6	18	20	9	15	11	16
Deep temperature (°C; May-Sept)	21	6	8	4	1	10	12	16	11	5	2	7	14	9	3	15	20	18	13	17	19
Deep salinity (May-Sept)	19	3	9	4	5	16	17	10	6	1	2	14	18	13	12	11	20	15	8	7	6
Copepod richness anom. (no. species; May-Sept)	19	2	1	7	6	14	13	18	15	10	8	9	17	4	5	3	11	20	21	16	12
N. copepod biomass anom. (mg C m^{-3}; May-Sept)	19	14	10	11	3	16	13	20	15	12	6	9	8	1	2	4	5	17	21	18	7
S. copepod biomass anom. (mg C m^{-3}; May-Sept)	21	2	5	4	3	14	15	20	13	10	1	7	16	9	8	6	11	18	19	17	12
Biological transition (day of year)	18	8	5	7	9	14	13	19	12	2	1	3	16	6	10	4	11	21	21	17	15
Ichthyoplankton biomass (mg C 1,000 m^{-3}; Jan-Mar)	21	12	3	8	10	19	18	15	17	16	2	13	5	14	11	9	20	6	7	1	4
Ichthyoplankton community index (PCO axis 1 scores; Jan-Mar)	10	13	2	7	5	11	20	18	3	12	1	14	15	8	4	6	9	19	21	17	16
Chinook salmon juvenile catches (no. km^{-1}; June)	19	4	5	16	8	12	17	20	11	9	1	6	7	15	3	2	10	13	18	21	14
Coho salmon juvenile catches (no. km^{-1}; June)	19	8	13	6	7	3	16	20	17	5	4	10	11	15	18	1	12	9	14	21	2
Mean of ranks	17.9	7.2	6.0	7.3	6.1	13.0	15.9	17.1	11.3	9.2	2.7	8.6	12.8	8.1	6.6	7.7	12.8	16.7	17.2	14.5	11.6
Rank of the mean rank	21	5	2	6	3	15	17	19	11	10	1	9	13	8	4	7	13	18	20	16	12
Ecosystem Indicators not included in the mean of ranks or statistical analyses																					
Physical Spring Trans. UI based (day of year)	3	7	20	17	4	13	15	21	13	1	6	2	8	11	18	9	19	10	5	16	11
Physical Spring Trans. Hydrographic (day of year)	20	3	13	8	5	12	14	21	6	9	1	9	18	3	11	2	16	7	17	19	14
Upwelling Anomaly (April-May)	10	3	17	6	9	14	13	21	10	4	7	8	15	17	15	12	19	1	2	20	5
Length of Upwelling Season UI based (days)	6	2	19	12	1	14	10	21	5	3	9	3	16	18	16	15	20	11	8	13	7
SST NH-5 (°C; May-Sept)	9	6	5	4	1	3	21	16	10	18	2	19	11	7	14	13	15	12	17	8	20
Copepod Community Index (MDS axis 1 scores)	20	3	4	8	1	13	15	18	16	10	2	6	12	9	7	5	11	19	21	17	14
Coho Juv Catches (no. fish km^{-1}; Sept)	11	2	1	4	3	6	12	14	8	9	7	15	13	5	10	NA	NA	NA	NA	NA	NA

Figure 3.2.1.a. Summary of marine indicators from 1998-2018. The top block is basin-wide climate indices, the second block is specific physical oceanographic indicators, and the third block is biological indicators. Numbers inside each block are rank value of that indicator across all years with one being the best and 21 the worst. Color coding is used to reflect ocean conditions for salmon growth and survival (green=good, yellow=intermediate, red=poor). The bottom block includes indicators not included in the mean ranks. (Source: NWFSC).

In 2013, there were mixed ocean conditions. The climate-indicators, such as Pacific Decadal Oscillation (PDO) and El Niño, were 'neutral'. However, sea surface temperatures were warmer than usual, and the majority of the upwelling occurred over a short period of time (i.e. July) with the upwelling 'season' ultimately ending much earlier than usual. The biological indicators pointed to good ocean conditions, with a high abundance of large, lipid-rich zooplankton, a moderate abundance of winter fish larvae that develop into salmon prey in the spring, and catches of juvenile spring Chinook salmon during the June survey off Washington and Oregon that were the second highest in 16 years. Overall, juvenile salmon entering the ocean in 2013 encountered average to above average ocean conditions off Oregon and Washington.

In 2014, many of the ecosystem indicators pointed towards a relatively poor year for salmon survival. The summer PDO values were strongly positive (warm), coinciding with a ‘warm blob’ of water centered in the Gulf of Alaska. El Niño conditions were 'neutral', sea surface temperatures were warmer than usual, and the upwelling season started late and ended early. The biological indicators featured a high abundance of large, lipid-rich zooplankton, but a low abundance of winter fish larvae that develop into salmon prey in the spring, and moderate catches of juvenile spring Chinook salmon during the June survey off Washington and Oregon. Overall, juvenile salmon entering the ocean in 2014 encountered below average ocean conditions off Oregon and Washington likely leading to below average returns of adult coho salmon in 2015.

In 2015, many of the ocean ecosystem indicators suggested a relatively poor year for juvenile salmon survival. The PDO was strongly positive (warm) throughout 2015, coinciding with anomalously warm ocean conditions in the NE Pacific called "The Blob" that began in the fall of 2013 and persisted through 2015. El Niño conditions also turned positive in April 2015 and remained strongly positive, signaling a strong El Niño at the equator. Despite the strongest upwelling observed since 1998, sea surface and deep water temperatures off Newport Oregon remained warmer than usual (+2°C) throughout most of 2015. During the strongest upwelling period in June, shelf waters did cool and were salty, but returned to positive temperature anomalies quickly from July onward. The zooplankton community remained in a lipid-deplete state throughout 2015, and was dominated by small tropical and sub-tropical copepods and gelatinous zooplankton that generally indicate poor feeding conditions for small fishes upon which juvenile salmon feed. Krill biomass was also among the lowest in 20 years. On the other hand, the biomass of larval fish species that are common in salmon diets in spring was above average this year, however, there were also high concentrations of larval rockfish and Northern anchovy which are generally indicators of poor feeding conditions for salmon. There were also many new copepod species encountered that had never been seen off Newport since sampling began in 1969.

Overall, juvenile salmon entering the ocean in 2014 encountered below average ocean conditions off Oregon and Washington, likely leading to below average returns of adult coho salmon in 2015 and Chinook salmon in 2016.

In 2017, the anomalous warm ocean conditions that have persisted since September of 2014 had begun to dissipate. While ocean ecosystem indicators in 2015 and 2016 suggested some of the poorest outmigration years for juvenile salmon survival in the 20 year time series, some of the indicators in 2017 were fair, indicating that the ecosystem might be returning to normal. The PDO was strongly positive (warm) throughout the first half of 2017, however the index declined to more neutral levels from July through November 2017. Strong La Niña conditions at the equator persisted from August through December of 2016, and then became neutral throughout most of 2017. Prior to the onset of upwelling in 2017, ocean conditions off Newport Oregon remained warm and fresh. However, after the onset of upwelling, sea surface temperatures were cooler than average and the near bottom water on the shelf was salty. In 2015 and 2016, the seasonal shift from a warm winter copepod community to a cold summer community did not occur because of the extended period of warm ocean conditions. However, in June 2017, the copepod community transitioned to a cold water community, signaling that the marine ecosystem might be transitioning back to normal.

In 2018, the anomalous warm ocean conditions that had persisted since September of 2014 have dissipated. While ocean ecosystem indicators in 2015 and 2016 remain some of the poorest outmigration years for juvenile salmon survival in the 21 year time series, some of the indicators in 2017 were fair, while the indicators in 2018 pointed towards neutral conditions, indicating that the ecosystem might be returning to normal. However, sea surface temperatures in the Northeast Pacific are anomalously warm with a spatial pattern similar to the "Blob" in late 2013. Further, model projections point towards warm ocean conditions of approximately +1°C in the Northeast Pacific through spring 2019.

3.2.2 Early life survival rates

Marine survival was calculated for the return years 2004-2017 as the age-3 ocean abundance of JDF coho salmon from postseason FRAM runs divided by the estimated smolt production in the previous year, derived from smolt trapping operations. Postseason coho FRAM runs are conducted by the Pacific Salmon Commission's (PSC) Coho Technical Committee (CoTC) each year to evaluate the Pacific Salmon Treaty. Marine survival is well correlated with age-3 ocean abundance ($r^2 = 0.84$) over the 14 year period from 2004-2017 (Figure 3.2.2.a). Marine survival of the 2012 brood year, which migrated to the ocean in 2014 and returned as adults in 2015, was the third lowest of the 13 year period. Marine survival of the broods returning in 2014 and 2016 were more typical, although they were still below the median survival.

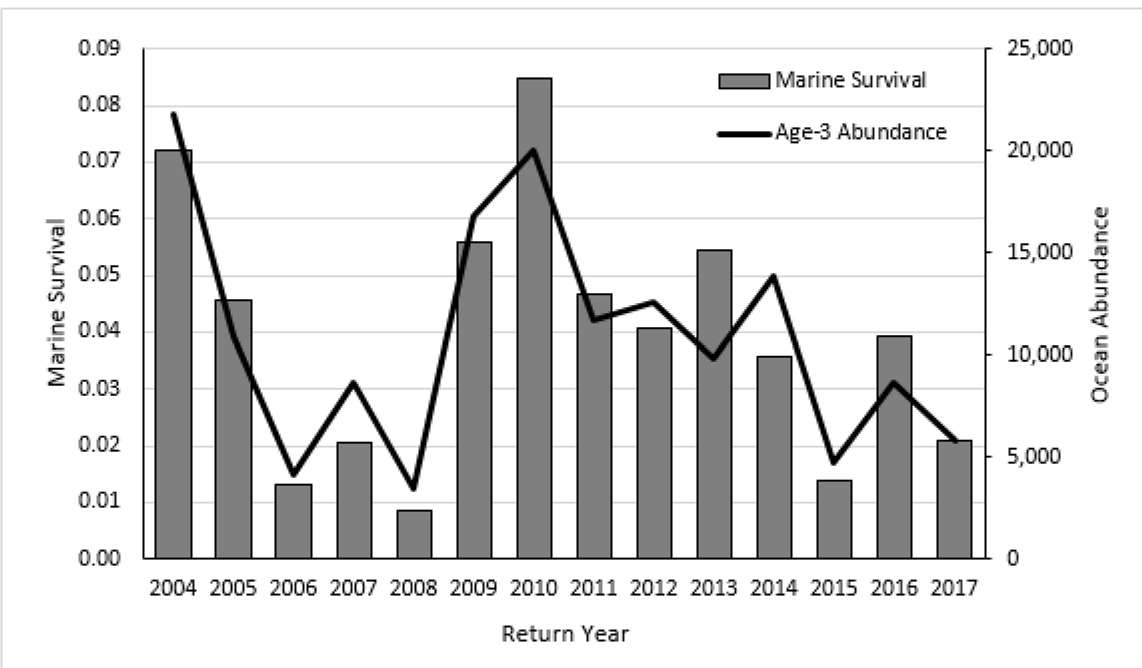

Figure 3.2.2.a. Marine survival of JDF coho salmon calculated from age-3 ocean abundance using postseason FRAM runs (PSC CoTC) and trap-based estimates of natural smolt production in the previous year.

3.3 Harvest impacts

3.3.1 Ocean fisheries

<u>Fisheries descriptions</u>

JDF coho are harvested in ocean fisheries in Washington, British Columbia, and to a lesser extent, in Alaska. They are also taken in Puget Sound fisheries, and commercial and recreational fisheries in the Strait of Juan de Fuca. There are no significant terminal net fisheries in the Strait, and recreational harvest in the rivers is negligible. Prior to 1997 the majority of harvest occurred in Canadian fisheries off the west coast of Vancouver Island. Beginning in 1997, Canada severely restricted coho fisheries to minimize impacts on Upper Fraser coho stocks, and Canadian fishery impacts on JDF coho decreased sharply.

Commercial ocean seasons

Council area commercial troll fisheries south of Cape Falcon typically do not allow retention of coho. North of Cape Falcon, non-Indian and Treaty Indian troll regulations typically allow coho retention from July through September. In 2014 and 2015, coho retention in the non-Indian commercial troll fishery was limited to adipose-marked coho through August; non-selective coho fisheries occurred in September. In 2016, the non-Indian commercial troll fishery was limited to 30 total fishing days in July and August; September was closed to all troll fishing. Coho retention was not allowed in the fishery in 2016. In 2017 and 2018, the troll fishery was assigned minimal coho quotas, and no non-selective coho fisheries occurred.

The Treaty Indian troll fishery was open from July through mid-September in 2014, 2015, 2017, and 2018 for all salmon species, and was limited to July and August in 2016, with no coho retention.

Recreational ocean seasons

North of Cape Falcon, the all-species recreational salmon fisheries were open from mid-June through late September in 2014 and 2015. In both years, coho retention was limited to adipose-marked coho through August, and unmarked coho retention was allowed in September. In 2016, the recreational fishery was limited to July 1 through August 27. Coho retention was not allowed north of Leadbetter Point in 2016. In 2017 and 2018, recreational salmon fisheries were assigned minimal coho quotas, and seasons were shortened relative to most recent years, ending on Labor Day. No non-selective coho fisheries occurred in 2016, 2017, or 2018.

South of Cape Falcon, coho retention was allowed from late June through early August in 2014, 2015, and 2016 with retention limited to adipose-marked coho. In 2017, mark-selective coho retention was allowed in late June and July, and in 2018, mark-selective coho retention was allowed late June through early September. Unmarked coho retention was allowed in all years in September.

Ocean harvest

Table 3.3.1.a shows coho quotas and catch by fishery during the period 2014 through 2018. During the three (critical) years that resulted in the overfished status, ocean harvest of coho fell well within the allowable quotas or guidelines. In the area north of Cape Falcon, coho harvest was severely restricted, if not prohibited, in 2016 due to the low forecasted returns. In 2017 and 2018, coho harvest remained restricted relative to recent years prior to 2016. In the area North of Cape Falcon, Council-area fisheries harvested 78 percent of the 282,500 coho quota in 2014, 42 percent of the 216,770 fish quota in 2015, 85 percent of the very low quota of 18,900 in 2016, 96 percent of the 60,100 coho quota in 2017, and 91 percent of the 60,100 coho quota in 2018.

Table 3.3.1.a. Coho harvest quotas for Council area commercial and recreational fisheries compared with actual harvest by management area and fishery.

Fishery Governed by Quota or Guideline	2014 Quota	2014 Catch	2014 Catch/Quota	2015 Quota	2015 Catch	2015 Catch/Quota	2016 Quota	2016 Catch	2016 Catch/Quota
NORTH OF CAPE FALCON									
TREATY INDIAN COMMERCIAL TROLL	62,500	55,897	89%	42,500	3,983	9%	-	-	-
NON-INDIAN COMMERCIAL TROLL	35,200	23,141	66%	19,200	5,059	26%	-	-	-
RECREATIONAL	184,800	140,450	76%	155,070	82,986	54%	18,900	16,059	85%
TOTAL NORTH OF CAPE FALCON	**282,500**	**219,488**	**78%**	**216,770**	**92,028**	**42%**	**18,900**	**16,059**	**85%**
SOUTH OF CAPE FALCON									
RECREATIONAL									
Coho mark-selective	80,000	48,530	61%	55,000	14,896	27%	26,000	1,547	6%
Coho non-mark-selective	35,000	34,267	98%	20,700	4,445	21%	7,500	4,170	56%
TOTAL SOUTH OF CAPE FALCON	**115,000**	**82,797**	72%	**75,700**	**19,341**	26%	**33,500**	**5,717**	17%
GRAND TOTAL COUNCIL AREA	**397,500**	**302,285**	**76%**	**292,470**	**111,369**	**38%**	**52,400**	**21,776**	**42%**

Fishery Governed by Quota or Guideline	2017 Quota	2017 Catch	2017 Catch/Quota	2018 Quota	2018 Catch	2018 Catch/Quota
NORTH OF CAPE FALCON						
TREATY INDIAN COMMERCIAL TROLL	12,500	13,084	105%	12,500	11,301	90%
NON-INDIAN COMMERCIAL TROLL	2,500	1,838	74%	4,600	1,384	30%
RECREATIONAL	45,100	42,658	95%	43,000	41,838	97%
TOTAL NORTH OF CAPE FALCON	**60,100**	**57,580**	**96%**	**60,100**	**54,523**	**91%**
SOUTH OF CAPE FALCON						
RECREATIONAL						
Coho mark-selective	18,000	6,177	34%	35,000	11,601	33%
Coho non-mark-selective	7,900	8,451	107%	7,600	6,898	91%
TOTAL SOUTH OF CAPE FALCON	**25,900**	**14,628**	56%	**42,600**	**18,499**	43%
GRAND TOTAL COUNCIL AREA	**86,000**	**72,208**	**84%**	**102,700**	**73,022**	**71%**

Source: PFMC Review of Ocean Fisheries, Table I-6, Feb 2015, Feb 2016, Feb 2017, Feb 2018, Feb 2019

3.3.2 Puget Sound fisheries

There are no U.S. in-river net or sport fisheries directed at JDF coho salmon. The only freshwater sport fishery for salmon in the Strait of Juan de Fuca region is the hatchery coho fishery in the Dungeness River, which is not included in the evaluation of JDF coho escapement. In-river fishery impacts to JDF coho are limited to incidental impacts in net and sport fisheries directed at other species.

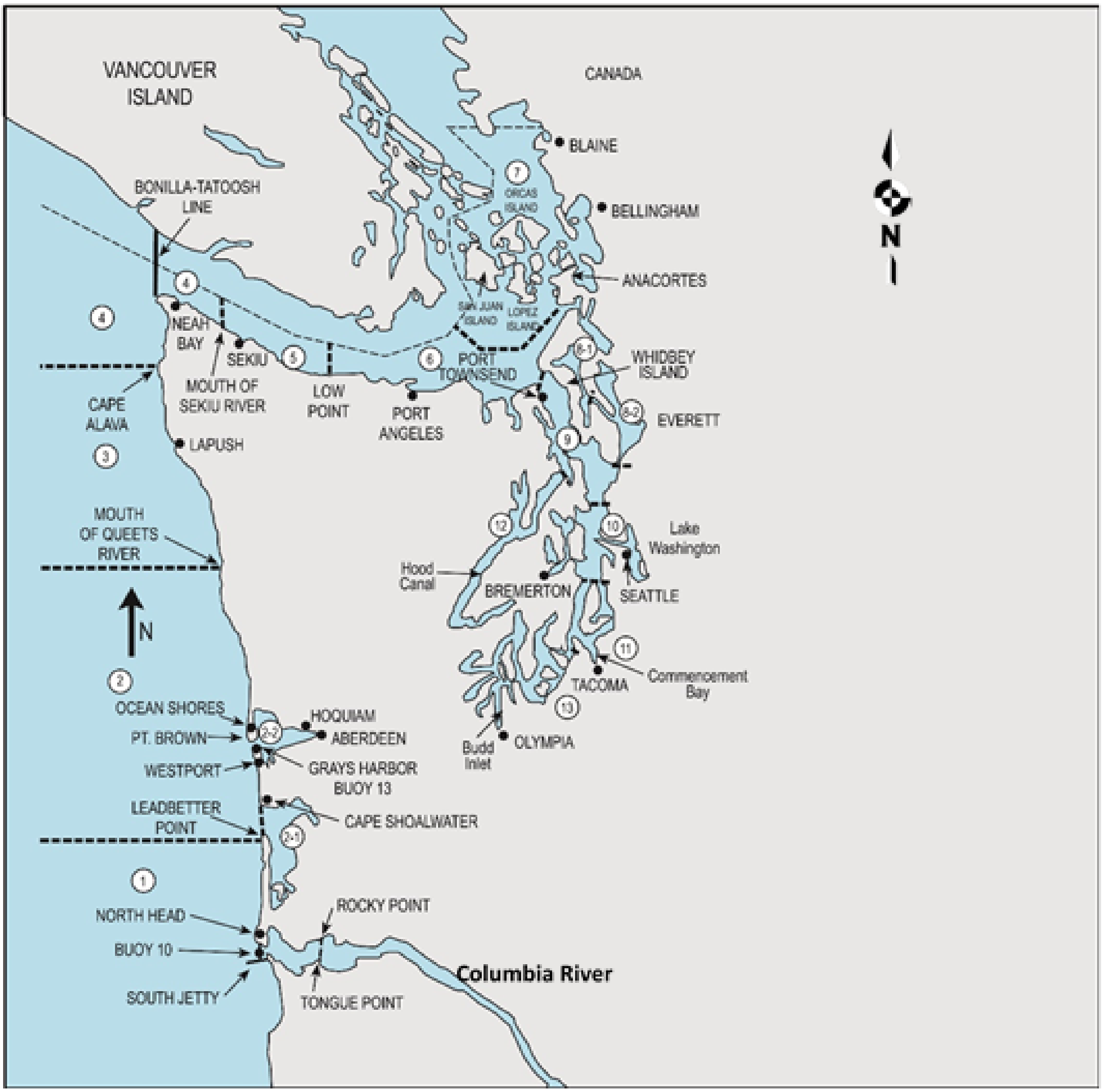

Figure 3.3.2.a. Map of Western Washington, showing the Marine Catch Areas of Puget Sound (Areas 5 through 13) and the Washington coast (Areas 1 through 4).

<u>Tribal fisheries</u>

Strait of Juan de Fuca (Area 5) is predominantly gillnet harvest during July-August, and then switches to set net harvest in October. Harvest in Areas 6 and 6C are modest.

In Central Puget Sound, harvest is largely from Area 10, in similar proportions for the month of September, October, and for gillnet and purse seine gears. Tribes have very limited fisheries in Area 9.

Harvest in terminal areas 8A and 8D (Port Susan and Tulalip Bay, respectively) are much larger in comparison to those in the Strait of Juan de Fuca and the Central Sound. During 2009-2016, total coho harvest amounted to 291,959 fish in Areas 8A and 8D (73,364 and 218,595 respectively). Most of the catch in both areas, occur in September, by gillnet in 8A and set net in 8D. In 8A there is very limited incidental coho catches from pink fisheries (calendar weeks 33-35) in odd-years, and none have occurred past the coho management period, since chum fisheries have remained closed in recent years. The 8D fishery targets Tulalip hatchery origin salmon (coho, chum and Chinook) on average the proportion of non-Tulalip Hatchery coho (around 15 percent) is significantly less than in the outside portion ("the Bubble") at 30 percent.

Non-Indian commercial seasons

The number of non-Indian commercial fisheries targeting coho within Puget Sound are limited in time and area. Within Puget Sound, non-Indian and Treaty Indian regulations typically allow coho retention from September through mid-October. In 2014 and 2015, coho retention in the non-Indian commercial Gillnet, Purse Seine, and Beach Seine Fisheries was limited to Quilcene Bay, Port Gamble Bay, Bellingham Bay, Dungeness Bay, Tulalip Bay and the waters through Possession Sound Northward to Camano Head. In 2016, the non-Indian commercial fishery targeting coho was not planned in the Tulalip Bay and Possession Sound areas, but was offered in all other areas.

Recreational seasons

Recreational fishing seasons in the marine catch areas of Puget Sound (Areas 5-13; see map in Appendix B, Table B.1) allowed some coho retention in most areas during the 2014-15 and 2015-16 seasons, via non-selective (NSF) or mark-selective (MSF) coho fisheries as specified in Table B.1. The standard daily bag limit in these fisheries was generally 2 salmon – up to 2 hatchery marked (adipose fin-clipped) coho in MSFs, and up to 2 coho (either marked or unmarked) in NSFs. Additionally, in 2015, as is typical for odd-year regulations, a pink salmon bonus limit (2 pink salmon in addition to the standard 2 salmon limit) was allowed in all Puget Sound marine areas except Areas 8-1 and 8-2. In contrast, coho retention was not allowed in most Puget Sound marine areas during the 2016-17 season due to relatively low run size forecasts for most Puget Sound coho stocks, with the exception of Hood Canal (Area 12; see further detail in Appendix B).

Puget Sound marine area harvest

Table 3.3.2.a. Coho harvest in Puget Sound marine fisheries[a,b]

	Number of coho caught (by fishery)		
Year	Treaty Indian	Non-Indian Commercial	Recreational[c]
2004	533,188	39,481	83,708
2005	287,037	19,694	58,309
2006	259,779	9,827	26,688
2007	209,137	13,435	65,306
2008	227,273	6,464	21,400
2009	259,528	20,091	75,719
2010	153,683	18,220	20,290
2011	223,800	28,821	56,775
2012	355,839	35,628	169,884
2013	298,503	29,577	115,934
2014	191,166	11,815	124,185
2015	47,118	4,777	142,669
2016	259,957	14,486	4,983
2017	191,478	11,763	40,686
2018	240,757	9,645	NA

[a] Data do not reflect treaty Indian allocations. Includes U.S. and Canadian-origin salmon and fish caught in test fisheries.

[b] Commercial and Treaty Indian data are preliminary. Sport data are preliminary in 2017.

[c] Recreational catches include WDFW Statistical Areas 5 through 13, which include the Strait of Juan de Fuca, San Juan Islands, and inner Puget Sound.

Source: Review of 2018 Ocean Salmon Fisheries (PFMC 2019), Tables B-39 and B-40.

3.3.3 Total exploitation rates

Postseason harvest and exploitation rate data for JDF coho were compiled from post season model runs of the Fishery Regulation Assessment Model (FRAM) that are generated annually by the Coho Technical Committee (CoTC) of the Pacific Salmon Commission. Over the 14 year period from 2004 through 2017, the total exploitation rate on JDF coho averaged 10.5 percent and ranged from a high of 18.0 percent in 2015 to a low of 2.8 percent in 2016 (Table 3.3.3.a). Over this time period, approximately 23 percent of the total exploitation occurred in Alaskan and Canadian fisheries while another 23 percent occurred in Council fisheries on average. The remaining 54 percent occurred in other preterminal and terminal fisheries, mostly in sport, net, and troll fisheries in the Strait of Juan de Fuca (Figure 3.3.3.a, Table 3.3.3.a, Table 3.4.2.b).

Under Amendment 16 to the FMP adopted by the Council in 2011, Puget Sound coho management units in the low abundance category are allowed a *de minimis* exploitation rate of up to 20 percent. Over the period from 2004-2017, total exploitation rates on JDF coho have remained below this limit, even though the management unit has not always been in the low abundance category. It is noteworthy, however, that the most recent three years in the time series included both the two highest exploitation rates (16.8 percent and 18.0 percent in 2014 and 2015, respectively) and the lowest observed exploitation rate (2.8 percent in 2016). During these same three years, exploitation rates in Council area fisheries ranged from 0.4 percent in 2016 to 2.5 percent in 2014 (Figure 3.3.3.a, Table 3.3.3.a).

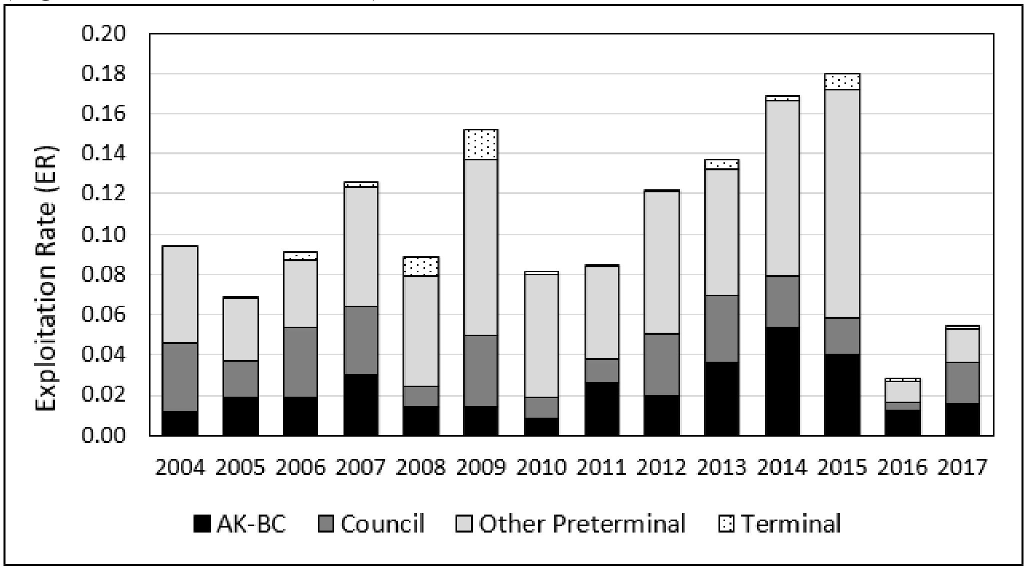

Figure 3.3.3.a. Postseason total exploitation rates by major fishery group on JDF coho (East JDF and West JDF Miscellaneous Wild model stocks) from FRAM estimates generated by the PSC CoTC.

Table 3.3.3.a. Ocean abundance, escapement and exploitation rates for JDF coho (East JDF and West JDF Miscellaneous Wild model stocks) from postseason FRAM estimates generated by the PSC CoTC.

Strata	2004	2005	2006	2007	2008	2009	2010[a/]
Ocean Age 3 Abundance	21,816	10,933	4,184	8,613	3,487	16,743	20,047
Escapement	19,756	10,186	3,802	7,528	3,179	14,199	18,417
Alaska-Canada	1.2%	1.9%	1.8%	3.0%	1.4%	1.4%	0.9%
NOF - Treaty Troll	2.7%	1.5%	3.0%	2.6%	0.9%	2.8%	0.6%
NOF - Nontreaty Troll	0.2%	0.1%	0.1%	0.2%	0.0%	0.3%	0.1%
NOF - Sport	0.4%	0.2%	0.2%	0.4%	0.1%	0.4%	0.2%
SOF all	0.2%	0.1%	0.2%	0.2%	0.0%	0.1%	0.1%
Preterminal Other	4.8%	3.1%	3.4%	5.9%	5.5%	8.7%	6.1%
Terminal Sport	0.0%	0.0%	0.2%	0.0%	0.9%	1.4%	0.0%
Terminal Net	0.0%	0.1%	0.2%	0.3%	0.0%	0.1%	0.1%
Total ER	9.4%	6.8%	9.1%	12.6%	8.8%	15.2%	8.1%
Strata	2011[a/]	2012[a/]	2013[a/]	2014[a/]	2015[a/]	2016[a/]	2017[a/]
Ocean Age 3 Abundance	11,715	12,540	9,801	13,813	4,706	8,682	5,850
Escapement	10,731	11,020	8,459	11,486	3,860	8,435	5,530
Alaska-Canada	2.6%	2.0%	3.6%	5.4%	4.0%	1.2%	1.6%
NOF - Treaty Troll	0.7%	2.0%	2.7%	1.6%	0.5%	0.0%	1.2%
NOF - Nontreaty Troll	0.1%	0.2%	0.2%	0.2%	0.3%	0.1%	0.1%
NOF - Sport	0.2%	0.2%	0.3%	0.3%	0.8%	0.1%	0.3%
SOF all	0.1%	0.7%	0.2%	0.4%	0.3%	0.2%	0.5%
Preterminal Other	4.6%	7.0%	6.3%	8.8%	11.4%	1.0%	1.7%
Terminal Sport	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Terminal Net	0.0%	0.0%	0.4%	0.2%	0.7%	0.2%	0.2%
Total ER	8.4%	12.1%	13.7%	16.8%	18.0%	2.8%	5.5%

a/ 2010-2017 results are preliminary

3.4 Assessment and management

3.4.1 Abundance forecast errors

The history of preseason forecasting of JDF coho has not been one of noteworthy accuracy. Through at least the past two decades, the forecasts have relied on the basic principle that the adult recruits are the product of smolt outmigration multiplied by a marine survival rate. That principal is a sound one; however, predicting that marine survival rate has not been an easy task.

Before 2007, the forecasts were developed by multiplying the brood year smolt outmigration by a 3-year average marine survival to December age-2 recruits (an age that is no longer used in FRAM).

In 2007, recognizing that JDF coho had undergone very low marine survival rates for the previous two years, the co-managers used the PDO index to predict marine survival. This method, which had used a regression model that was not statistically significant, reduced the predicted marine survival rate by only a small amount, and ultimately overpredicted the survival rate for that year by about five times. That method was abandoned, and in the following year of 2008, the forecast was again based on a 3-year average marine survival rate. Beginning in 2009, and continuing through the present year, the forecast was developed once again by using independent variables to predict marine survival.

These predictor variables, however, have not been used consistently from year to year. For example, the September juvenile coho catches in the NOAA trawl surveys offshore of Oregon and Washington were an excellent predictor of marine survival for coho returning as adults the following year (P=0.042 for predicting marine survival; P=0.009 for predicting recruits directly). That data series was collected over a 15-year period, but the September trawl surveys were discontinued after 2012 for funding reasons, and other variables were used to predict marine survival in later years. Predictor variables that were statistically significant have been used in other years, but as post season abundance estimates became available from other years, some of those predictor variables were no longer good predictors, and were dropped from the forecasts.

Additional forecasts using various methods developed by others for coastal and Puget Sound natural coho stocks are also reviewed annually to assess how the different JDF forecast model options fit into the bigger regional picture.

In 2014 and 2016, the forecasts were lower than the postseason estimate of abundance (under-forecast), while in 2015 the forecast abundance was greater than the postseason estimate of abundance (over-forecast) (Table 3.4.1.a, Figure 3.4.1.a, Figure 3.4.1.b). Despite the inaccuracy, the forecasted abundance fell into the correct abundance category in every year during 2014-2016. Consequently, abundance forecast errors did not play a substantial role in the overfished classification.

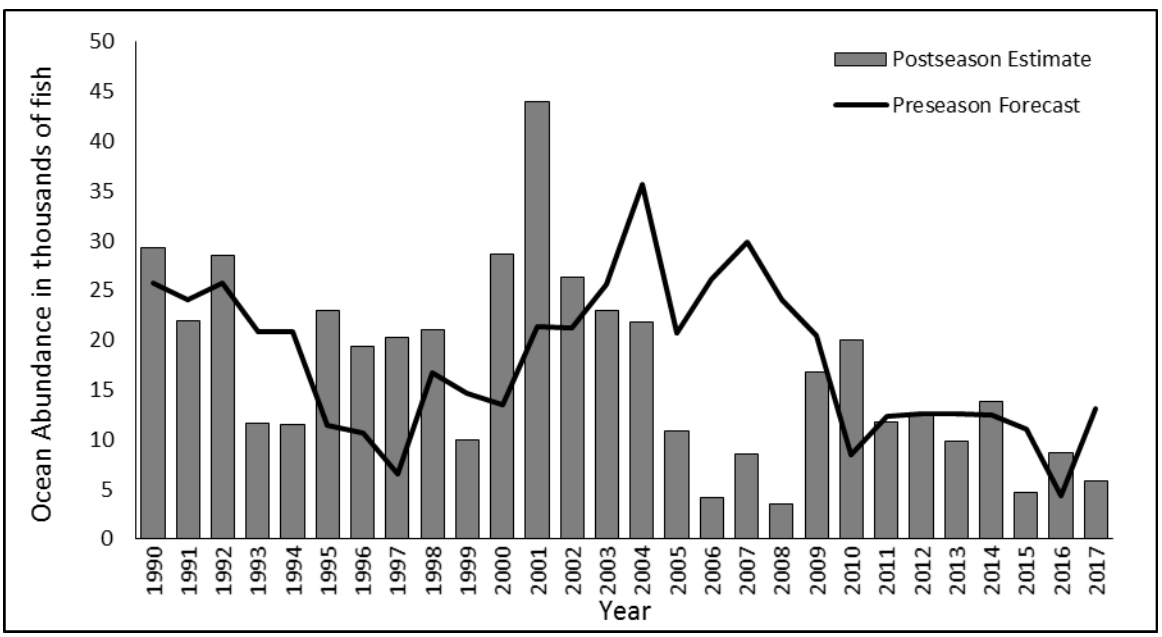

Figure 3.4.1.a. Preseason forecasts and postseason FRAM estimates of ocean age 3 abundance of JDF coho (East JDF and West JDF Miscellaneous Wild model stocks). Preseason forecasts are generated by salmon co-managers and postseason FRAM estimates are generated by the PSC CoTC.

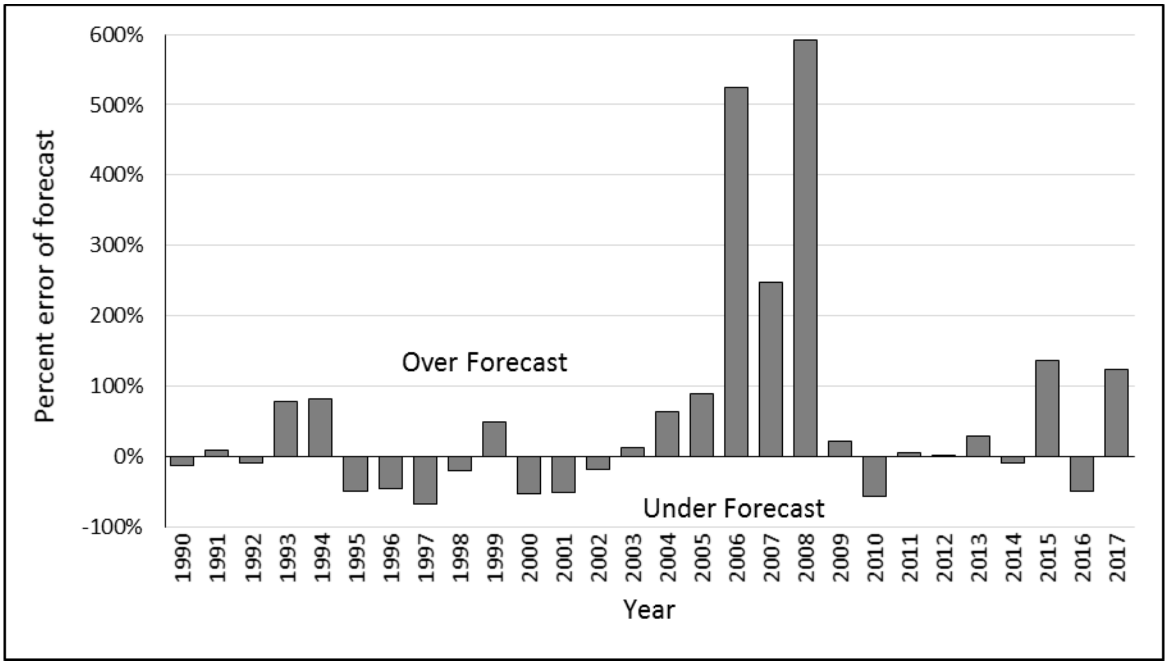

Figure 3.4.1.b. Preseason forecast error when compared to postseason estimates of ocean abundance of JDF coho (East JDF and West JDF Miscellaneous Wild model stocks). Preseason forecasts are generated by salmon co-managers and postseason FRAM estimates are generated by the PSC CoTC.

Table 3.4.1.a. Preseason and postseason estimates of ocean age 3 abundance (in thousands of fish) for JDF coho (in thousands of fish (East JDF and West JDF Miscellaneous Wild model stocks).

Year	Preseason Forecast	Postseason Estimate[a/]	Pre/ Postseason
		Strait of Juan de Fuca	
1990	25.8	29.4	0.88
1991	24.1	22.0	1.10
1992	25.7	28.6	0.90
1993	20.8	11.6	1.79
1994	20.8	11.5	1.81
1995	11.4	23.0	0.50
1996	10.7	19.4	0.55
1997	6.5	20.3	0.32
1998	16.8	21.0	0.80
1999	14.7	9.9	1.48
2000	13.5	28.6	0.47
2001	21.4	43.9	0.49
2002	21.3	26.3	0.81
2003	25.6	22.9	1.12
2004	35.7	21.8	1.50
2005	20.7	10.9	1.66
2006	26.1	4.2	5.65
2007	29.9	8.6	2.92
2008	24.1	3.5	6.25
2009	20.5	16.7	0.83
2010	8.5	20.0	0.43
2011	12.3	11.7	0.65
2012	12.6	12.5	0.93
2013	12.6	9.8	1.29
2014	12.5	13.8	0.90
2015	11.1	4.7	2.37
2016	4.4	8.7	0.51
2017	13.1	5.9	2.24

a/ Coho FRAM was used to estimate post season ocean abundance.
2010-2017 values are preliminary.

3.4.2 Exploitation rate forecast errors

The escapement years that contributed to the overfished determination for JDF coho were 2014 through 2016. The forecasts during these years placed the abundance in the appropriate category. In 2014, the stock was in the moderate abundance category with a total ER cap of 40 percent, and in 2015 and 2016 it was in the low abundance category with a total ER cap of 20 percent. Regardless of the abundance category, both preseason predicted ERs and postseason observed ERs have consistently been less than 20 percent due to management measures necessary to meet more limiting management criteria of other stocks. The postseason estimated total ERs were greater than the preseason projections in 2014 and 2015, but less than the preseason projection in 2016. In 2014 and 2015, the total postseason estimated ERs were higher than those projected preseason, mainly due to greater than anticipated impacts in northern fisheries and in recreational fisheries in the Strait of Juan de Fuca and Puget Sound (Table 3.4.2.b). In every case, the impacts in Council area fisheries were less than anticipated.

A summary of preseason projected and postseason estimated total exploitation rates, compared to those allowed (cap) since 2010 is provided in the following table. This helps illustrate the change in preseason/postseason exploitation rates, and also the change in the ER 'cap'.

Table 3.4.2.a. Preseason and postseason total exploitation rates for JDF coho generated in FRAM modeling conducted by the PFMC Salmon Technical Team (preseason) and the PSC CoTC (postseason).

Return Year	Exploitation Rate			
	Preseason		Postseason	
	ER	ER cap[a/]	ER[b/]	ER cap[a/]
2010	0.11	0.20	0.08	0.40
2011	0.11	0.40	0.08	0.40
2012	0.13	0.40	0.12	0.40
2013	0.13	0.40	0.14	0.20
2014	0.12	0.40	0.17	0.40
2015	0.13	0.20	0.18	0.20
2016	0.05	0.20	0.03	0.20
2017	0.05	0.40	0.05	0.20
Average	0.10	0.33	0.11	0.30

a/ See CoTC 2013 for information on determination of ER caps.
b/ Postseason exploitation rates are preliminary.

Table 3.4.2.b. Preseason forecast and postseason estimates of escapement, total mortality, and exploitation rate by fishery for JDF natural coho during years that contributed to the overfished classification (2014-16), and data for the most recent year available (2017). Data Sources: preseason forecasts generated by salmon co-managers, preseason exploitation rates from FRAM modeling by the PFMC STT, and postseason FRAM estimates generated by the PSC CoTC.

	2014		2015		2016		2017	
FISHERY COMPONENT	Preseason	Postseason	Preseason	Postseason	Preseason	Postseason	Preseason	Postseason
Ocean Age 3 Abundance	12,582	13,813	11,169	4,706	4,433	8,682	13,074	5,850
FMP Smsy	11,000	11,000	11,000	11,000	11,000	11,000	11,000	11,000
Escapement after all fisheries	11,073	11,486	9,761	3,860	4,203	8,435	12,437	5,530
Alaska-Canada	153	741	312	189	119	108	228	93
Council North of Falcon								
Treaty Troll	357	224	230	23	1	1	124	69
Nontreaty Troll	53	30	43	13	5	8	26	4
Sport	59	38	55	36	15	13	25	17
Council South of Falcon	81	56	47	13	18	16	50	27
Council Subtotal	**550**	**348**	**375**	**85**	**39**	**38**	**225**	**117**
Preterminal Other								
Troll	1	6	36	5	-	-	4	2
Net	338	295	211	27	66	85	125	89
Sport	459	908	467	505	6	-	51	10
Terminal Net and Sport	8	29	7	35	-	16	-	9
Total Fishing Mortality	**1,509**	**2,327**	**1,408**	**846**	**230**	**247**	**633**	**320**
Alaska-Canada	1.2%	5.4%	2.8%	4.0%	2.7%	1.2%	1.7%	1.6%
Council North of Falcon								
Treaty Troll	2.8%	1.6%	2.1%	0.5%	0.0%	0.0%	0.9%	1.2%
Nontreaty Troll	0.4%	0.2%	0.4%	0.3%	0.1%	0.1%	0.2%	0.1%
Sport	0.5%	0.3%	0.5%	0.8%	0.3%	0.1%	0.2%	0.3%
Council South of Falcon	0.6%	0.4%	0.4%	0.3%	0.4%	0.2%	0.4%	0.5%
Council Subtotal	**4.4%**	**2.5%**	**3.4%**	**1.8%**	**0.9%**	**0.4%**	**1.7%**	**2.0%**
Preterminal Other								
Troll	0.0%	0.0%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%
Net	2.7%	2.1%	1.9%	0.6%	1.5%	1.0%	1.0%	1.5%
Sport	3.6%	6.6%	4.2%	10.7%	0.1%	0.0%	0.4%	0.2%
Terminal Net and Sport	0.1%	0.2%	0.1%	0.7%	0.0%	0.2%	0.0%	0.2%
Total Exploitation Rate	**12.0%**	**16.8%**	**12.6%**	**18.0%**	**5.2%**	**2.8%**	**4.8%**	**5.5%**

3.5 Summary of potential causal factors

In analyzing the reasons why JDF coho did not achieve their minimum spawner threshold for the return years 2014 through 2016, it is useful to examine the events and conditions that affect their life cycle and limit their abundance. As the preceding sections discuss, in the three-year coho life from egg to spawner, there are numerous conditions that affect their survival and return rate, but for the purpose of this analysis we can distill those down to freshwater conditions, ocean conditions, and fisheries.

In this section, we compare the effects of events and conditions at different life-cycle stages by applying the range of variables from one life stage to the average from another. This approach shows the effect that each life stage can make when the other life stages are held constant. The results of this analysis are shown in Table 3.5.a, and discussed here.

Freshwater conditions, including parent-year spawning escapement, are reflected in annual smolt abundance. We can view the smolt abundance as incorporating the effects of not only the parent-year spawning escapement, but also the events and environmental conditions the coho experience during incubation and freshwater residence. For brood years 2001 through 2014 (return years 2004 through 2017) the abundance of smolts has varied by a factor of slightly greater than 2-to1, from a high of about 420,000 to a low of 180,000. If we apply the average marine survival rate for this stock, 4.1 percent, to this range of smolt abundance we find that the entire freshwater life history, from egg to smolt, makes a difference of about 10,000 ocean age-3 recruits.

By contrast, marine survival rates for Strait of Juan de Fuca coho over these same brood years have varied by a factor of almost 10-to-1, from a high of over 8 percent to a low of less than 1 percent. Applying these rates to an average smolt production over this time period of approximately 300,000 smolts, we can conclude that the marine survival rates make the difference of over 23,000 ocean age-3 recruits. Marine survival was below the median value for the three broods, especially for the brood returning in 2015. Lower marine survival in 2015 is attributed to poor ocean conditions and lack of available prey. In 2015, JDF coho returned in much lower numbers than forecasted preseason. They were also much smaller than normal, resulting in less fecundity per returning adult. This had a compounding effect on the resource, resulting in both low escapement and low spawning potential for those that did return.

The low marine survival resulted in ocean age-3 abundances that were in the low, or lower end, of the moderate abundance categories for all three broods. Since 2004, the ocean age-3 abundance has never been high enough to be categorized as abundant, despite marine survival rates that have averaged more than 4 percent, and have exceeded 8 percent. This suggests that freshwater productivity may be a chronic problem that, coupled with recent marine conditions, has reduced the productivity of the JDF coho, to the point where the breakpoints in stepped exploitation rate harvest policy and/or the allowable total ERs may need to be reexamined.

By comparison, fishery mortality on this stock has been fairly low, and has made a correspondingly low difference in spawning escapement. The total fishery mortality of Strait of Juan de Fuca natural coho in all fisheries (calculated from the data shown in Table 3.3.3.a) has ranged from about 250 to 2,500. In North of Falcon ocean fisheries, the total fishery mortality of this stock, excluding the year 2016, when there were no ocean coho fisheries, has ranged from a low of 35 fish to a high of 711 fish. Consequently, harvest reductions have limited efficacy in rebuilding this stock.

During the 2004-2017 time period, exploitation rates have consistently been maintained at levels below the rate allowed when the stock is in the low abundance category, and have averaged less than 11 percent. However, 2014 and 2015 experienced the highest ERs in this time period, and this did contribute to the stock being classified as overfished.

Forecasting errors have been large in past years, with forecasts in some years being greater than five times the actual abundance. However, in 2014-2016 the forecasts placed the abundance status in the correct category in every year, and thus did not contribute to the stock becoming overfished. In each year the ER in Council-area fisheries was less than the preseason expectation, so management error in Council-area fisheries did not play a role in the stock becoming overfished.

However, in 2014 and 2015 total ERs exceeded the preseason expectation by 5 percent in both years, so it could be argued that although ERs were lower that the FMP allowed, management error contributed to the stock becoming overfished.

Table 3.5.a. applies the extremes of one set of conditions to the average of three stages in the life of the coho. The results shown in the table are not the actual numbers of recruits or spawners, but are the product of the calculations: for example, the high marine survival rate applied to an average number of smolts. The table shows the extent to which freshwater and marine conditions and fishery mortality can affect the number of adult recruits or the number of spawners. These results make it clear that ocean conditions, as reflected in marine survival rates, drive the abundance of adult recruits of this stock more than any other factor, and therefore affect the abundance of spawners more than any other factor. While we cannot predict future ocean conditions, they might also allow for rebuilding this stock sooner than restrictions on fisheries can.

Table 3.5.a. Comparison of factors affecting abundance of JDF coho.

		High	Low	Difference
Recruit abundance as limited by freshwater conditions				
Average marine survival rates	3.9%			
Smolt abundance		421,143	179,912	
Resulting ocean age-3 recruits		16,603	7,093	9,510
Recruit abundance as limited by marine survival				
Average smolts	306,336			
Marine survival rates		8.5%	0.9%	
Resulting ocean age-3 recruits		25,967	2,627	23,340
Spawner abundance as limited by fishery mortality				
Average ocean age-3 recruits	10,924			
Fishery mortality, all fisheries combined		2,544	247	
Resulting spawners		8,380	10,677	2,297

4.0 RECOMMENDATIONS FOR ACTION

4.1 Recommendation 1: Rebuilt criterion

Consider the JDF coho stock to be rebuilt when the 3-year geometric mean of natural-area adult escapement meets or exceeds S_{MSY}. This is the default rebuilt criterion in the FMP.

4.2 Recommendation 2: Management strategy alternatives

Recommend the Council adopt a management strategy (control rule) that will be used to guide management of fisheries that impact JDF coho until rebuilt status is achieved. We offer two alternative management strategies for consideration. The rebuilding time frame under each of the alternatives are not expected to exceed the maximum rebuilding time (T_{MAX}) of 10 years. The probability of achieving rebuilt status for years 1 (2018) through 10 are projected in Section 4.5., *Analysis of management strategy alternatives.*

The description of alternatives may include references intended to meet NEPA or MSA criteria. Guidelines suggest that alternatives are identified as either an ‘action’ or a ‘no-action’ alternative, and that the minimum time (T_{MIN}) and the time estimated to achieve rebuilt status (T_{target}) are acknowledged within the suite of alternatives. See Section 2.1 for a more complete description.

Alternative I: Status Quo. During the rebuilding period continue to use the current management framework and reference points, as defined in the FMP and the PST, to set maximum allowable exploitation rates on an annual basis. Projected rebuilding time, T_{target}, is six years (see Section 4.5). This is considered a 'no-action' alternative.

Alternative II: Limit ER. The Council will plan ocean fisheries to limit impacts on JDF coho consistent with exploitation rate limits identified by the Washington tribal and state comanagers, and consistent with the FMP. The comanagers will limit Southern U.S. fisheries to a maximum ER of 10% regardless of annual abundance forecasts until rebuilt status is achieved to promote rebuilding of the stock while allowing limited fisheries to occur.

The tribal and state co-managers will structure inside fisheries during the North of Falcon preseason process that, in combination with PFMC fisheries, will meet this exploitation rate objective. The co-managers may implement additional conservation measures, as necessary.

Projected rebuilding time, T_{target}, is five years (see Section 4.5). This is considered an 'action' alternative.

For the two alternatives and the T_{MIN} scenario, year 1 for the T_{MIN} and T_{target} calculations is defined as 2018. This convention was adopted for JDF coho due to data availability, as the most recent estimates of ocean abundance and spawner escapement are from 2017. Rebuilding times projected here assume the control rules defined in the alternatives were first applied to 2018 fisheries, and each of the nine years thereafter. However, an adopted rebuilding plan will likely be first implemented in 2020.

4.3 Recommendation 3: Comanager recommendations

In light of the current habitat conditions and recent marine survival, it is strongly recommended that the comanagers (tribal and state) re-examine S_{MSY} and MSST reference points that are incorporated into the FMP and the Comprehensive Coho Management Plan. Since the development of the reference points in 2000, nearly 20 years of stock assessment data have been collected. Analyses of these data suggest that abundance levels defined by the relationship between spawners and smolts and intended to maximize smolt production may provide for more appropriate reference points.

4.4 Recommendation 4: Habitat Committee

This report has identified that habitat conditions may have contributed to escapement shortfalls and thus the overfished status determination. It is recommended that the Council direct the Habitat Committee to work with federal, state, local, and tribal habitat experts to review the status of the essential fish habitat affecting the overfished stock and, as appropriate, provide recommendations to the Council for restoration and enhancement measures within a suitable time frame, as described in the FMP. Habitat-related topics lie outside the expertise of the STT and thus the Habitat Committee is better suited to conduct a review.

4.5 Analysis of management strategy alternatives

The STT has developed a model to assess the probability of a stock achieving rebuilt status in the years following an overfished declaration. In this model, for Strait of Juan de Fuca natural coho future abundance is based on a distribution fitted to past observed ocean age-3 abundances (2004-2017). Realistic levels of error in abundance forecasts, escapement estimates, and exploitation rate implementation contribute to the projected adult spawner escapement. Replicate simulations are performed to allow for projecting the probability of achieving rebuilt status by year. The model framework allows for evaluation of alternative rebuilding plans by specifying the rebuilding plans as alternative harvest control rules. Model structure, parameterization, and additional results are presented in Appendix C.

This model was applied to Strait of Juan de Fuca natural coho in order to provide projected rebuilding times, with year 1 representing 2018. The projected rebuilding time is defined here as the number of years needed for the probability of achieving rebuilt status to meet or exceed 0.50. Given this assumption, rebuilding times are projected to be six years for Alternative I and five years for Alternative II. T_{MIN}, based on a no fishing scenario, was projected to be four years (Table 4.5.a). The rebuilding probabilities in Table 4.5.a are displayed graphically in Figure 4.5.a. There were very small differences in rebuilding time probabilities between alternatives I and II. For example, there is a difference of 0.023 between alternatives I and II in year five (Table 4.5.a), and this difference resulted in the one year difference in projected rebuilding times between those alternatives. While a probability of 0.5 has been used here to define rebuilding times, the Council has the discretion to recommend a probability greater than 0.5 to be used for this purpose.

Table 4.5.a. Projected rebuilding probabilities by year for each of the alternatives and the T_{MIN} scenario.

	Year									
	1	2	3	4	5	6	7	8	9	10
Alternative I	0.009	0.185	0.293	0.393	0.479	**0.560**	0.626	0.683	0.731	0.768
Alternative II	0.011	0.192	0.308	0.410	**0.502**	0.577	0.639	0.698	0.743	0.788
T_{MIN}	0.016	0.264	0.414	**0.544**	0.639	0.714	0.773	0.822	0.862	0.893

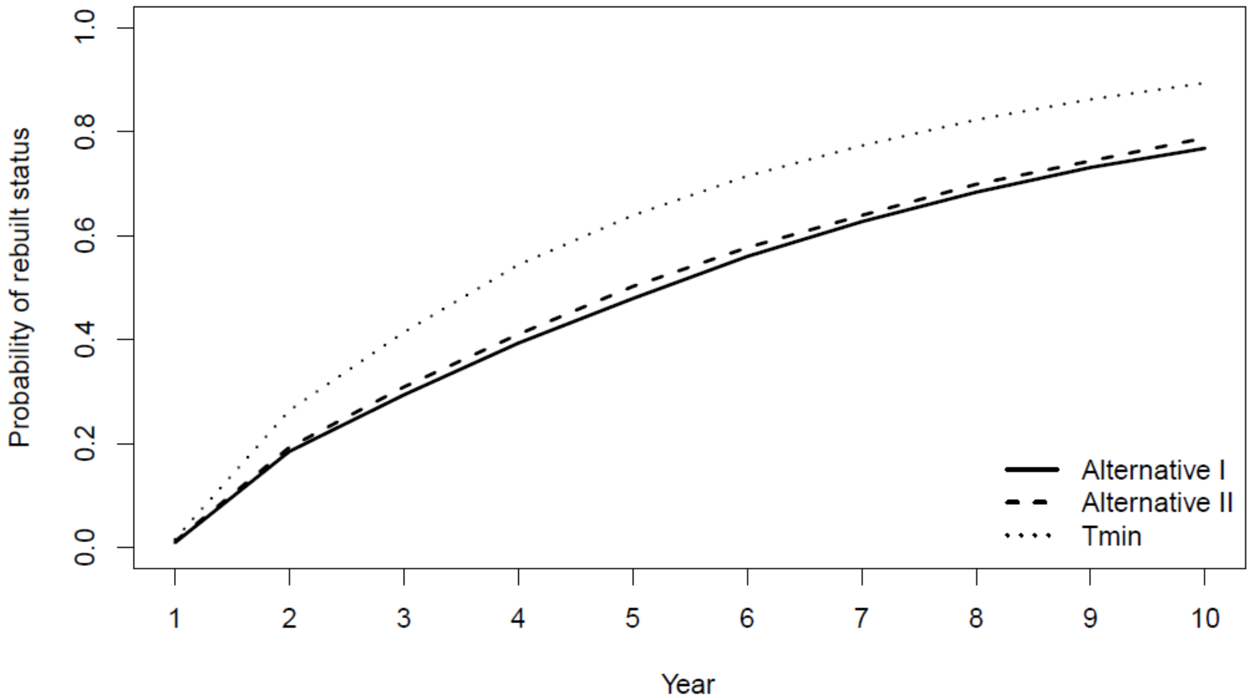

Figure 4.5.a. Projected probability of achieving rebuilt status by year under the two alternatives and the T_{min} scenario.

The model described here was created to allow for a quantitative assessment of rebuilding alternatives. The tool has some elements of a management strategy evaluation (MSE), but lacks an explicit biological operating model. It relies on draws from an abundance distribution informed by past abundance levels. As such, no explicit population dynamics are included in the model. Data limitations and the short time frame for development of rebuilding plans did not allow for constructing a more detailed operating model. The model also does not explicitly account for mixed-stock effects, where another stock could limit access to Strait of Juan de Fuca natural coho in ocean fisheries and prevent attainment of allowable exploitation rates.

The probability of achieving rebuilt status for alternative rebuilding plans within a 10 year window is the core result of this analysis. The results for particular alternatives may be most useful if interpreted in a relative rather than absolute sense. Actual rebuilding periods may be somewhat shorter or longer than these results suggest due to the vagaries of future production, ocean conditions, and fisheries.

5.0 SOCIOECONOMIC IMPACT OF MANAGEMENT STRATEGY ALTERNATIVES

5.1 Approach to the socio-economic analysis and benchmark/baseline

The approach for the analysis is to provide the best information possible on the impacts of each of the alternatives. To achieve this end the analysis includes both quantitative and qualitative information. As needed to describe potential impacts of the alternatives, the socioeconomic analysis assesses the following:

- The likelihood that the rebuilding stock will be constraining in a particular year:
    - the degree to which the stock has been a constraint historically, and

    - the differences in escapement policy between historical policies and the action alternatives for recent years.
- The potential degree of reduction in ocean fisheries:
    - the differences in escapement policy between no action and action alternatives over a range of stock abundances, and
    - the average reduction in ocean fisheries and attendant changes in personal income that might be expected, assuming the stock is constraining in every year.

It is important to assess the likelihood that a stock will be constraining because when a stock is not constraining a change in the harvest policy might have no impact. Regulations governing ocean fisheries are generally shaped by the most constraining stock (i.e., the stock for which it is most difficult to meet escapement policies because of relatively low abundance.). In such cases there are usually surplus escapements (i.e., escapement levels in excess of the management goal) for non-constraining stocks. If a more conservative harvest policy is imposed for a stock that is non-constraining in a particular year, even without imposing the more conservative harvest policy any surplus escapement of the non-constraining stock may be more than sufficient to meet the more conservative criteria, and thus the policy would have no additional impact on that stock.

Predicting whether or not a particular stock will be constraining in the future is untenable because it requires a projection of the abundance of every other potentially constraining stock in the region. Therefore to assess the likelihood that a stock may be constraining in the future, the approach used here is first to consider whether a stock has been a constraint historically, and second to look at a hindcast of how historical harvest policies would have been different if the action alternative described below had been in place at that time. The hindcast is used to indicate the degree to which the action alternative might have modified historical harvests at the time including whether a stock that was not constraining may have become so under the action alternative.

Setting aside the question of whether the stock was or would be constraining, an upper bound on the potential degree of harvest reduction in ocean fisheries is indicated first by a general comparison of the status quo and alternative harvest policies, and second by using additional results from the STT modeling of the probability of a stock achieving rebuilt status under alternative management strategies (see section 4.5). Specifically, the additional results used are the average reductions in exploitation rates derived from 10,000 replicate simulations of 10-year management cycles under each alternative strategy. Differences in average exploitation rates between the alternative simulations are used as an indicator of the magnitude of the difference in socio-economic impact, and a proportional relationship between the two is assumed (e.g., if exploitation rates are reduced by 10 percent then economic activity associated with salmon fishing will be reduced by 10 percent). The assumption of a proportional relationship is used because it is not possible to predict *a priori* how the Council might shape a particular season given the status of each stock it is managing. Each year the Council engages in an extensive public process in which it shapes seasons to optimize harvest by addressing allocation issues among various harvesting sectors and geographic areas while ensuring that the preseason expectation is that escapement objectives are met for all stocks. In particular, the Council generally optimizes fishing opportunity by shaping season structures to avoid constraining stocks. Because of this flexibility to use season shaping to mitigate negative impacts, estimates of changes in impacts based solely on proportional differences in exploitation rates should be considered as upper bounds (i.e., the degree of reduction is not likely be as great as indicated here especially if it is unlikely that the stock will be a constraint on shaping the salmon seasons).

These average proportional changes in exploitation rates are then applied to an average annual personal income impact associated with the fishery (an economic benchmark) to provide an indicator of the change in overall economic activity derived from non-tribal commercial and recreational ocean salmon fisheries each year under a given alternative. These average annual impacts are then multiplied by the projected median number of years to rebuild under the alternative to generate an estimate of the economic effect over the entire rebuilding period.[3]

Personal income impacts in this case are the personal income generated as a result of direct expenditures related to fishing (recreational and commercial), processing, and support industry activities. These include personal income earned directly by those participating in fishing and processing activities (including charter vessels providing recreational trips), personal income earned by those employed in businesses that supply and service commercial fishing, recreational fishing and processing support activities (e.g., fuel and bait suppliers, mechanics and truck drivers; also called indirect income), and the personal income generated by other businesses when those with direct and indirect income spend their money in the community (e.g., grocery stores and restaurants). On the one hand, when fishing activity is reduced, personal income impacts may not be reduced proportionally because affected individuals may increase their activity in other fisheries or take up substitute economic activity in the same community. On the other hand, with respect to alternative fishing activity a recent study indicates that substitution may be minimal and there can be short and long term effects that result in impacts that are more than proportional to the reduction in the salmon fishery. For example, with respect to vessels that remained active during a closure, there was only limited evidence that more diversified vessels made up for their reduced salmon fishing with increased activity elsewhere (Richerson and Holland, 2017). Furthermore, vessels that are more dependent on salmon are likely to cease all fishing activity during a salmon closure rather than increase activity in other fisheries, and a portion of those will exit the fishery permanently (*Ibid.*). Even if other vessels take up the slack as opportunity returns, those vessels may be located in different ports (or some local infrastructure may have disappeared) causing geographic redistributions. Additional information on the modeling and interpretation of personal income impacts (also termed community income impacts) is provided in Chapter IV of the Review of 2017 Ocean Salmon Fisheries (PFMC 2018b).

It is important to recognize, that despite similarity in terminology, personal income impacts differ from the impacts of an alternative. Personal income impacts are the income associated with a particular activity, while the impacts of an alternative are the changes from status quo that occur as a result of implementing a new policy (i.e., an action alternative). For example, suppose that the personal income impacts associated with fishing under status quo are $10 million and those under an action alternative $9 million. Therefore the potential impact of the action alternative, as represented by the reduction or redistribution of personal income compared with status quo, would be $1 million.

[3] The analytical approach here is basically a quantitatively informed qualitative analysis. In an approach that was able to provide a more precise quantitative estimate of the expected annual changes in impacts, discount rates would be applied to the stream of expected changes.

Domestic ocean fisheries impacting the coho stock covered by this rebuilding plan occur mainly in Washington state and north of Cape Falcon, Oregon. These include ocean commercial and recreational. In addition, when a coho stock constrains ocean fisheries there may be increases in inside fishing opportunity. The focus of this analysis is impacts on ocean fisheries and related economic activity. Therefore for the economic benchmark, personal income impacts for port areas in Oregon and Washington north of Cape Falcon during 2004 to 2016 are used. There are currently five salmon rebuilding plans in development that are using the same 2004-2016 range of years for the economic analysis, including for two other Washington coho stocks and two California Chinook stocks. The year 2016 was selected for the last year of the period because it was the most recent year for which data were available when the analytical models were developed. Years prior to 2004 are not included because quality of the coho data in those years was not as strong as the more recent years, and a desire to maintain consistency across rebuilding plans. There are not strong reasons to deviate from using this same period of years across all five rebuilding plans, and this consistency is expected to simplify review and comprehension of the analyses for both decision makers and the public. These years span recent history and describe a range of harvest and escapement levels that could reasonably be expected to occur in future years, although due to ocean, climate, and other conditions, the actual distribution may tend more toward one end of this spectrum than the other, or exhibit increased variability.

Estimates of total coastal community personal income impacts during 2004-2016 in affected port areas north of Cape Falcon for the non-tribal commercial ocean troll salmon fishery averaged approximately $3.4 million per year (in inflation-adjusted 2016 dollars), ranging from $1.6 million in 2008 to $5.6 million in 2015, and for the ocean recreational salmon fishery averaged approximately $9.9 million, ranging from $4 million in 2008 to $16 million in 2014. Total community personal income impacts in affected areas from the combined non-tribal commercial troll and recreational salmon fisheries conducted in ocean areas averaged approximately $13.3 million during 2004-2016, ranging from $5.6 million in 2008 to $21.3 million in 2014[4] (Figure 5.1.a and Table 5.1.a).

For the individual port areas, inflation-adjusted personal income impacts during the period from combined ocean non-tribal commercial troll and recreational salmon fisheries averaged approximately $1.3 million in Neah Bay, ranging from $0.4 million in 2008 to $2.2 million in 2004; $0.7 million in La Push, ranging from $0.3 million in 2016 to $1 million in 2015; $6.7 million in Westport, ranging from $3 million in 2008 to $10.2 million in 2015; $3.3 million in Ilwaco, ranging from $1.2 million in 2008 to $5.8 million in 2014; and $1.5 million in Astoria, ranging from $0.7 million in 2008 to $3.1 million in 2014 (Figure 5.1.b and Table 5.1.a).

2008 was the lowest year for combined non-tribal ocean salmon fishery personal income impacts during the period overall and for three of the five affected port areas: Neah Bay, Westport and Ilwaco, while 2016 was the lowest year for La Push and Astoria. 2014 had the highest combined

[4] It is important to note that income impact estimates produced for years prior to the 2010 data year were derived using a different methodology than estimates for subsequent years. While strictly speaking, estimates produced using the two methodologies may not be directly comparable, for simplicity this limitation was overlooked for this analysis, since the change more or less equivalently affected both the commercial and recreational sectors and all port areas. A description of the transition to the current income impact methodology and comparisons of results from the earlier and current models are found in Appendix E of the Review of 2014 Ocean Salmon Fisheries.

salmon fishery personal income impacts during the period overall and also for two port areas: Ilwaco and Astoria. The highest years for the remaining three port areas were 2004 for Neah Bay, and 2015 for both La Push and Westport (Figure 5.1.b and Table 5.1.a).

Although not included in these non-tribal economic impact estimates, tribal commercial ocean troll salmon fisheries also occur and contribute economically to coastal communities. In addition, JDF coho are also taken in commercial and tribal net fisheries and recreational fisheries in Puget Sound and its tributaries. During 2004-2016, commercial net harvests of adult JDF coho in the Puget Sound region averaged 3,369 fish, ranging from 332 fish in 2015 to 6,877 fish in 2009.[5] Given that these fisheries do occur and contribute to coastal and Puget Sound communities, the economic benefit from affected salmon fisheries is likely higher and more widely distributed than is indicated by the economic benchmark used in this document.

At the request of the Makah Tribe, Neah Bay tribal troll landings have been included to emphasize the value of this fishery to the economy of Neah Bay. During 2004-2016, annual landings of coho and Chinook salmon into Neah Bay by the tribal troll fishery were, on average, six times that of the non-tribal commercial troll fishery (Table 5.1.b). During that same period in Neah Bay, 32 percent of the tribal landings, by weight, were coho, compared to 6 percent of the non-tribal commercial troll landings. This data helps identify the magnitude of the economic contribution of tribal fisheries within the port area of Neah Bay. The majority of tribal landings in Neah Bay are from the Makah Tribe. Employment related to processing and handling of tribal landings is also not included in these economic estimates. Overall, the economic benefit to the Neah Bay community (including the Makah Tribe) from ocean salmon fisheries are likely higher than what is indicated in this document, as personal income impacts from tribal fisheries which are not included would likely exceed the average personal income impact from the non-tribal commercial salmon fishery, which is estimated at $468,000 per year (Table 5.1.a)

In summary, there are three elements to this analysis: primarily qualitative information on future conditions (related primarily to the likelihood that the stock will be a constraint and whether there will be any impact from an alternative harvest policy), a quantitative indicator of the economic magnitude of the fishery and how future conditions might change relative to a benchmark if the stock is constraining (effects of the action on personal income associated with the fishery), and qualitative caveats regarding the quantitative information (reasons the personal income impact estimates might be off in one direction or another). Information about how future conditions will change even in the absence of any action is taken into account in the cumulative impact section of this document (section 6.7), which take into consideration current trends as well as the impacts of reasonably foreseeable future actions.

[5] Puget Sound catch data from *Review of 2018 Ocean Salmon Fisheries: Stock Assessment and Fishery Evaluation Document for the Pacific Coast Salmon Fishery Management Plan*. Table B-42.

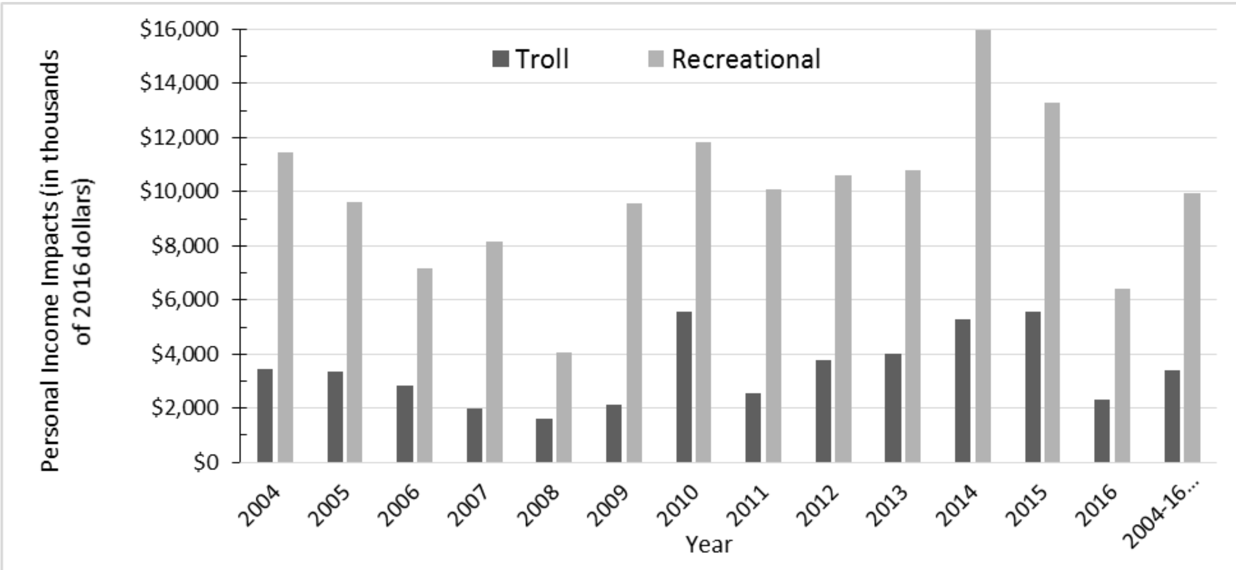

Figure 5.1.a. Estimates of total, aggregated personal income impacts in affected coastal communities in Washington and Oregon north of Cape Falcon in thousands of real (inflation adjusted, 2016) dollars for the non-tribal commercial ocean troll and ocean recreational salmon fisheries.

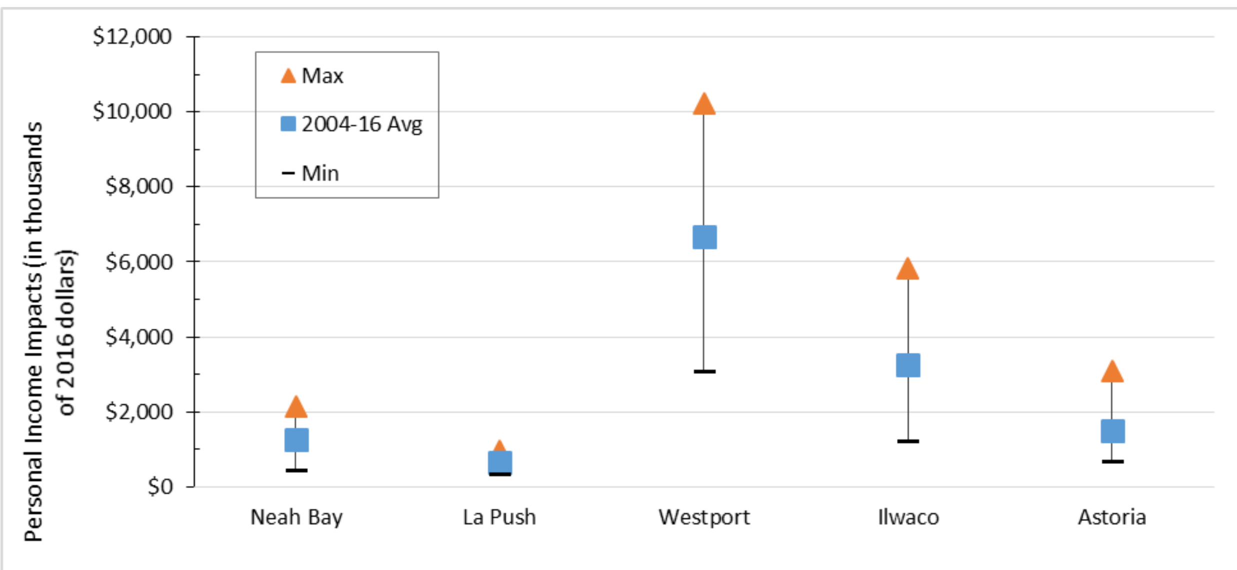

Figure 5.1.b. Estimates of personal income impacts by coastal community in thousands of real (inflation adjusted, 2016) dollars for the combined non-tribal commercial ocean troll and recreational ocean salmon fisheries in Washington and Oregon north of Cape Falcon.

Table 5.1.a. Estimates of personal income impacts by coastal community in thousands of real (inflation adjusted, 2016) dollars for the non-tribal commercial ocean troll and recreational ocean salmon fisheries for major Washington and Oregon port areas north of Cape Falcon.

OCEAN TROLL	Neah Bay	La Push	Westport	Ilwaco	Astoria	Total
2004	928	293	1,154	113	969	3,457
2005	761	454	1,170	144	803	3,333
2006	566	459	440	295	1,050	2,811
2007	250	254	1,038	129	310	1,981
2008	163	216	616	164	442	1,601
2009	331	342	1,192	83	180	2,128
2010	251	403	3,843	95	972	5,563
2011	575	228	1,407	96	244	2,551
2012	862	501	1,467	234	723	3,788
2013	485	448	2,674	74	354	4,035
2014	385	445	1,528	1,108	1,840	5,305
2015	315	641	3,021	420	1,171	5,568
2016	206	204	1,386	219	305	2,321
2004-16 Avg	**468**	**376**	**1,611**	**244**	**720**	**3,419**
Max	**928**	**641**	**3,843**	**1,108**	**1,840**	**5,568**
Min	**163**	**204**	**440**	**74**	**180**	**1,601**
RECREATIONAL	**Neah Bay**	**La Push**	**Westport**	**Ilwaco**	**Astoria**	**Total**
2004	1,228	260	5,332	3,494	1,151	11,465
2005	842	263	4,866	2,829	835	9,636
2006	552	231	3,593	2,200	600	7,176
2007	563	180	3,687	2,875	842	8,146
2008	244	108	2,425	1,024	242	4,043
2009	657	288	4,626	3,166	848	9,586
2010	777	332	6,312	3,422	976	11,819
2011	758	363	5,180	3,033	756	10,089
2012	944	343	5,848	2,853	606	10,594
2013	1,088	368	5,679	2,987	687	10,810
2014	1,190	484	8,315	4,731	1,242	15,962
2015	1,059	334	7,203	3,793	909	13,298
2016	595	112	2,746	2,604	352	6,410
2004-16 Avg	**807**	**282**	**5,062**	**3,001**	**773**	**9,926**
Max	**1,228**	**484**	**8,315**	**4,731**	**1,242**	**15,962**
Min	**244**	**108**	**2,425**	**1,024**	**242**	**4,043**
Combined	**Neah Bay**	**La Push**	**Westport**	**Ilwaco**	**Astoria**	**Total**
2004	2,156	553	6,486	3,607	2,120	14,922
2005	1,603	718	6,036	2,974	1,638	12,969
2006	1,118	690	4,033	2,495	1,649	9,986
2007	813	434	4,725	3,004	1,151	10,127
2008	407	324	3,041	1,189	683	5,644
2009	989	630	5,819	3,249	1,029	11,715
2010	1,028	735	10,155	3,517	1,948	17,382
2011	1,333	590	6,587	3,129	1,001	12,640
2012	1,806	845	7,315	3,087	1,329	14,382
2013	1,573	816	8,353	3,061	1,041	14,844
2014	1,576	928	9,842	5,839	3,082	21,268
2015	1,374	975	10,223	4,213	2,080	18,866
2016	800	316	4,132	2,824	658	8,730
2004-16 Avg	**1,275**	**658**	**6,673**	**3,245**	**1,493**	**13,344**
Max	**2,156**	**975**	**10,223**	**5,839**	**3,082**	**21,268**
Min	**407**	**316**	**3,041**	**1,189**	**658**	**5,644**

Income impact estimates from *Review of 2017 Ocean Salmon Fisheries: Stock Assessment and Fishery Evaluation Document for the Pacific Coast Salmon Fishery Management Plan.* Tables IV-17 and IV-18

Table 5.1.b. Pounds of salmon landed by the tribal and non-tribal commercial troll ocean salmon fisheries in the port area of Neah Bay (thousands of dressed pounds).

	Tribal Fisheries			Non-Tribal Fisheries			Ratio
Year	Chinook	Coho	Total	Chinook	Coho	Total	Tribal
2004	705.5	382.2	1087.7	250.2	12.3	262.6	4.1
2005	503.2	146.3	649.5	169.8	2.1	172.0	3.8
2006	284.4	181.6	466.0	86.0	3.1	89.0	5.2
2007	214.0	208.0	422.0	38.0	3.0	41.1	10.3
2008	121.8	109.6	231.4	19.6	2.3	21.9	10.6
2009	96.4	295.1	391.5	31.3	29.2	60.5	6.5
2010	247.9	62.3	310.2	47.8	0.5	48.4	6.4
2011	353.4	70.8	424.1	113.0	5.7	118.7	3.6
2012	491.7	182.6	674.3	171.7	6.5	178.2	3.8
2013	432.8	223.4	656.2	85.3	4.7	90.0	7.3
2014	243.6	73.7	317.3	76.8	6.7	83.5	3.8
2015	329.3	9.8	339.1	61.3	0.2	61.6	5.5
2016	192.0	0.0	192.0	28.2	0.2	28.4	6.8
Ave	324.3	149.6	474	90.7	5.9	96.6	6.0
Min	96.4	0	192	19.6	0.2	21.9	3.6
Max	705.5	382.2	1087.7	250.2	29.2	262.6	10.6

Source: Makah tribe commercial catch data and *Review of 2017 Ocean Salmon Fisheries: Stock Assessment and Fishery Evaluation Document for the Pacific Coast Salmon Fishery Management Plan.* Table IV-8.

5.2 Alternative I

Under Alternative I, the current management framework and reference points[6] used to set maximum allowable exploitation rates on an annual basis would remain in place (i.e., status quo). Since Alternative I would not change harvest policy for JDF coho, there would be no direct or indirect economic impact relative to status quo, and whether or not JDF coho is a constraining stock would not affect that result.

Under Alternative I, the estimated timeframe needed to achieve rebuilt status (with a probability of at least 50 percent) under status quo exploitation rates is 6 years (Figure 4.5.a and Table 4.5.a). Since harvest policy would not change, economic activity associated with Alternative I would not be expected to change from the baseline, and the general magnitude of that activity is reflected in the benchmark economic data provided in Section 5.1 (i.e., inflation-adjusted 2004-2016 average of $13.34 million per year in income from combined non-tribal ocean commercial and recreational salmon fisheries in the affected coastal communities north of Cape Falcon). At the same time, note that actions under rebuilding plans for other salmon stocks may be associated with deviations from the baseline.

Not including differences in short term impacts (impacts during the rebuilding period), the long-term impacts of Alternative I are expected to be similar to the other alternatives in that all the alternatives are expected to achieve rebuilding in a relatively few number of years.

[6] As defined in the FMP and the PST.

5.3 Alternative II

Under Alternative II, fishing with an exploitation rate that is on average approximately 6.5 percent reduced from status quo / Alternative I is estimated to result in rebuilding in 5 years, one year less than under status quo / Alternative I. The comparative cost of this alternative is the reduced annual harvest opportunity (here estimated with income impacts) times the expected number of years it takes to rebuild under the alternative. Note that if rebuilding takes a longer or shorter period, the costs would be increased or reduced, respectively.

With respect to comparing the Alternative II policy criteria to existing policy criteria over the entire range of abundances, in the past there has not been a policy to constrain the US southern exploitation rate to at or below some maximum level, except as needed to meet the overall exploitation rate criteria. Therefore, the new policy represents an entire new constraint that applies to all abundance levels.

The impact of the rebuilding policy in a particular year will depend first on the degree to which the new control rule constrains ocean harvest in that year. As discussed in Section 5.1, one indication of the likelihood that a stock will be a constraint is the degree to which it has been a constraint in the past. Because of the large number of considerations that affect the deliberations on each year's salmon season it is sometimes difficult to determine with certainty whether or not a given stock was a constraint in any particular year. However, historically, JDF coho appears not to have been a constraint on ocean fisheries. If this continues into the future, the socio-economic impacts of Alternative II would be minimal. Table 5.3.a summarizes whether the three Washington coho stocks under rebuilding, or other coho stocks of concern, were constraining to ocean salmon fisheries north of Cape Falcon during the 2004-2019 seasons. The table shows that JDF coho were never the most constraining stock on ocean salmon fisheries north of Cape Falcon during the period. Of the three rebuilding coho stocks, Queets River natural coho were constraining on ocean salmon fisheries north of Cape Falcon four years during the period: 2015-2018. Other natural coho stocks that were constraining on ocean salmon fisheries north of Cape Falcon include: Fraser River stocks during 11 of the 16 years (2004-2007 and 2009-2015), Lower Columbia River natural coho during four years (2006 and 2008-2010), Oregon coastal natural coho during one year (2008), and Grays Harbor coho during one year (2018). In the most recent year shown, 2019, fisheries north of Cape Falcon were shaped to minimize impacts on Puget Sound Chinook. Whether JDF coho is constraining in the future depends not only on the abundance of JDF coho but also the relative abundance of other stocks. While past patterns indicate minimal likelihood that Alternative II would result in a constraint on ocean fisheries, with changing conditions in the future it is possible that the frequency with which JDF coho is constraining will increase, making the estimates of changes in personal income impacts more relevant.

The Alternative II policy would limit the Southern U.S. fisheries exploitation rate to 10 percent or less. Applying that policy over the 2004-2016 period would have resulted in some additional constraints in six of the 13 years (Table 5.3.b). On average, there would need to have been a 9 percent reduction in exploitation rate for the six years in which JDF coho would have become a constraint (2004, 2007, 2009 and 2012-2014), with a greatest single-year reduction of 17 percent (in 2012).

As mentioned above, STT modeling of Alternative II predicts an exploitation rate that is on average 6.5 percent reduced from status quo / Alternative I. Assuming JDF are constraining for the years that the model predicts a reduction in the exploitation rate under Alternative II, and that there would be a comparable proportional reduction in ocean fisheries north of Cape Falcon in such years, the economic impact estimated for combined non-tribal commercial and recreational ocean fisheries in terms of associated personal income would be $0.87 million per year, or 5 x -$0.87 million = -$4.34 million over the 5-year rebuilding period (in 2016 dollars). In a year in which Alternative II alters fishery management, the single year impacts would likely be higher than the 6.5 percent average reduction (which includes years of no impact). Since the rebuilding period is expected to be short, the actual conditions are unlikely to reflect the average. As discussed in Section 5.1, to the degree that JDF coho are constraining, impacts might be lower than indicated here if other economic activities are substituted for salmon fishing; higher if there is an amplification due to vessels dropping out of fishing entirely for the short or long term; or distributed differently if there is a geographic shifting of activity as a result of season shaping or change in the location of harvesters and infrastructure over the long term. The amplification effect is probably more likely to occur with a complete closure of the salmon fishery than under an open fishery with a reduced exploitation rate. There might also be offsetting gains in inside fisheries and escapement effects for other stocks that are not quantified here. Note that these impact also do not include effects on tribal fisheries.

Not including differences in short term impacts (impacts during the rebuilding period), the long-term impacts of Alternative II are expected to be similar to Alternative I (no action) and the T_{MIN} scenario in that rebuilding would be achieved in a relatively few number of years.

Table 5.3.a. Stocks that were most constraining to north of Cape Falcon ocean salmon fisheries at the time annual management measures were adopted (Preseason Report III)

		Graphic depiction of which coho stocks were most constraining (Red indicates constraining, Yellow indicates depressed but not constraining)							
Year	Most Constraining Stock(s)	Queets R.	JDF[1]	Snohomish R.	Fraser R.	LCN[2]	OCN[3]	GH[4]	Other
2004	Fraser								
2005	Fraser								
2006	Fraser and LCN								
2007	Fraser								
2008	LCN and OCN								
2009	Fraser and LCN								
2010	Fraser and LCN								
2011	Fraser								
2012	Fraser								
2013	Fraser								
2014	Fraser								
2015	Fraser and Queets								
2016	Queets								
2017	Queets								
2018	Queets and Grays Harbor								
2019	PS Chinook[5]								
16 yrs	No. of years constraining:	4	-	-	11	4	1	1	1

Notes:

1/ Strait Juan de Fuca coho

2/ Lower Columbia River natural coho

3/ Oregon coastal natural coho

4/ Grays Harbor coho

5/ In 2019 fisheries north of Cape Falcon were shaped to minimize impacts on Puget Sound Chinook.

Table 5.3.b JDF coho historical preseason escapement and exploitation rate projections, relevant management criteria and comparison with Alternative II policy (thousands of fish and percentages).

	Preseason				Mangement Criteria		Alt II	
	Exploitation Rate (ER)	Council Area Fisheries ER	Spawning Escapement	Projected Southern US (SUS) ER	ER (<u><</u>)	Spawner Escapement Criteria (<u>></u>)	Maximum SUS ER	Change (Preseason Project to Alt II)
2004	13.0%	5.5%	31.2	11.0%	60.0%	21.8	10%	-9%
2005	12.0%	4.0%	18.2	10.0%	40.0%	12.8	10%	-
2006	11.3%	3.0%	23.1	8.4%	40.0%	12.8	10%	-
2007	12.0%	3.7%	26.3	10.6%	40.0%	12.8	10%	-6%
2008	11.0%	2.2%	21.6	9.1%	40.0%	12.8	10%	-
2009	11.9%	4.6%	18.1	10.2%	40.0%	12.8	10%	-2%
2010	11.2%	3.8%	7.5	10.0%	20.0%	12.8	10%	-
2011	10.8%	3.1%	11.0	9.3%	40.0%	-	10%	-
2012	12.8%	3.9%	11.0	12.0%	40.0%	-	10%	-17%
2013	12.9%	3.8%	11.0	11.2%	40.0%	-	10%	-11%
2014	12.0%	4.4%	11.1	10.8%	40.0%	-	10%	-7%
2015	12.6%	3.4%	9.8	9.8%	20.0%	-	10%	-
2016	<10%	0.9%	4.2	2.5%	20.0%	-	10%	-

5.4 T_{MIN} rebuilding scenario

Under the T_{MIN} rebuilding scenario rebuilding is estimated to occur as quickly as possible, 4 years assuming an exploitation rate of zero during that time. Under T_{MIN} there would be no fishing and therefore JDF coho would be constraining (although it might be constraining in conjunction with Queets and Snohomish coho if the T_{MIN} scenario were applied to those stocks simultaneously). Compared with the 'no action' or status quo management strategy of Alternative I, under the T_{MIN} scenario the estimated upper-bound economic impact in terms of reduction in non-tribal commercial and recreational fisheries income impacts is $13.34 million per year, or 4 x -$13.34 million = -$53.38 million (in 2016 dollars) over the 4-year rebuilding period. As discussed in Section 5.1, impacts might be lower than this if other economic activities were substituted for salmon fishing;[7] higher if there is an amplification due to vessels dropping entirely out of fishing for the short or long term, or distributed differently if there is a geographic shifting of activity as a result of season shaping or change in the location of harvesters and infrastructure over the long term. The amplification effect may be more likely with a complete closure of the salmon fishery under the T_{MIN} scenario. There might also be offsetting gains in inside fisheries and possible escapement benefits for other stocks that are not quantified here (depending on spawner-recruit relationships, increased escapement that results in increased spawning might positively or negatively impact long-term production). Also note that these estimates do not include effects on tribal fisheries.

[7] Recent studies have pointed to the difficultly vessels have exhibited in compensating for lost salmon opportunities by increasing activity in other West Coast fisheries, even for vessels with history of participation in those fisheries. Thus, substitute activities might tend to be non-fishing. See, e.g., Richerson, K., and Holland, D. S. 2017. Quantifying and predicting responses to a US West Coast salmon fishery closure. – ICES Journal of Marine Science, doi:10.1093/icesjms/fsx093.

There is some chance that rebuilding could occur before or later than the median 4 years required under T_{MIN}, thereby reducing or increasing total short term economic impacts, respectively.

Not including differences in short term impacts (impacts during the rebuilding period), the long-term impacts of the T_{MIN} scenario are expected to be similar to Alternative I (no action) and Alternative II in that rebuilding would be achieved in a relatively few number of years.

5.5 Summary of socio-economic impacts

Table 5.5.a summarizes the short-term economic trade-offs, assuming at least a 50 percent probability of rebuilding for each alternative or scenario. If rebuilding occurs more quickly (i.e., if a lower probability time to rebuilding occurs) then the impacts would be less than indicated, and if rebuilding occurs more slowly than the impacts would be greater than indicated (see the last two lines of the table). In years that JDF coho is not constraining there may be no differences between Alternative I and Alternative II. Due to the difficulty of plausibly modelling multiple stocks over time, the modeling used to derive the average reductions did not take into account whether the stock would be constraining or not, possibly resulting in an over-estimate of the average reduction in exploitation rate under Alternative II. Also, since the average reductions in exploitation rates were averaged across 10,000 replicate simulations of 10-year management cycles while the rebuilding periods are predicted to be relatively short, the actual conditions encountered during the brief rebuilding period are likely to vary substantially from the modeled average. This could lead to impacts that are substantially above or below the average. These and other assumptions and caveats together with their implications are covered in Table 5.5.b.

Table 5.5.a. Summary of economic impacts of the JDF coho rebuilding alternatives

	Alt I	**Alt II**	**T_{MIN} Scenario**
Key Assumptions	JDF Coho would constrain fisheries in the North of Falcon Area North of Falcon Fisheries would be reduced in proportion to the reduction in the exploitation rate under each alternative.		
Frequency of JDF Coho Constraint Preseason: 2004-2019	0 of 16 Years		
Alternative Hindcast for 2004-2016	0 of 13 Years	6 of 13 Yrs	13 of 13 (possibly co-constraining if other rebuilding coho stocks are managed under the T_{MIN} Scenario)
Rebuilding Time Based on a 50% Rebuilding Probability Threshold	6 Years	5 Years	4 Years
Rebuilding Probability for Rebuilding Time	56%	50%	54%
Reduction in Mean Exploitation Rate	0%	6.5%	100%
West Coast Ocean Area Fishery Economic Impacts Per Year	None	-$0.87 million per year	-$13.34 million per year
West Coast Ocean Area Fishery Total Impacts	None over 6 yrs	-$ 4.34 million over 5 yrs	-$53.4 million over 4 yrs
Probability of Rebuilding in One or Two Years	18.5%	19.2%	26.4%
Probability of Rebuilding Taking 6 or More Years	44%	42.3%	28.6%

Table 5.5.b. Assumptions/Caveats used in the analysis and potential implications

Assumption/Caveats	Potential Implication
JDF Coho will be constraining.	JDF coho are not usually the most constraining stock in the north of Cape Falcon area. To the degree that they would not be constraining for years in which there is a difference between Alternative I and Alternative II, there would not be a cost associated with Alternative II, relative to Alternative I. JDF coho would always be constraining under the T_{MIN} Scenario.
Ocean, habitat, and other conditions will remain within historic ranges.	To the degree that environmental conditions change in coming years, JDF coho may become more constraining (depending on the impact of those conditions on JDF coho relative to other stocks), or have shorter or longer rebuilding time frames with correspondingly lower or higher economic impacts.
Ocean fishing is reduced for all sectors and ocean areas north of Cape Falcon in proportion to the average reduction in exploitation rates.	The Council shapes seasons to mitigate impacts of reductions in exploitation rates. Therefore, for Alternative II actual impacts are likely to be lower than indicated here, although single-year reductions in exploitation rates in certain areas may be substantially greater than the average. Given the short duration of the rebuilding periods, impacts are likely to vary substantially from the average (higher or lower), which was estimated based on 10,000 model runs.
Rebuilding times will be equal to the median.	There are reasonably large probabilities that rebuilding times are shorter or longer than the median time, and that the attendant socio-economic impacts will therefore be less or greater than indicated (see last two lines of the above table).
Tribal fishery impacts not included.	There would likely be both social and economic impacts from the disruption of Native American tribal fisheries, which are not quantitatively assessed.
Impacts to inside fisheries are not included	To the degree that ocean fisheries are constrained there may be increased activity in inside fisheries.
Impacts to abundance of other stocks are not included	Achieving escapement objectives for JDF coho could lead to more escapement for other stocks, which may have positive or negative impacts, depending on the spawner-recruit relationships for those stocks.
Substitute economic activities are not taken into account in personal income impact estimates.	Economic impacts may be overestimated to the degree that substitute economic activity is available. Recent studies indicate that alternative fishing activities are often not pursued to a significant degree, therefore if there are substitute activities they would likely be non-fishing related.
The possibility of amplification and geographic redistribution are not taken into account in personal income impact estimates.[a/]	Particularly during complete closures, some vessels will completely stop fishing, thereby reducing overall activity more than proportionally to the reduction in salmon fishing. This reduction may continue to some degree even after the fishery reopens. Geographic redistribution due to season shaping or, during a closure, loss of vessels or infrastructure could result in greater impacts to some ports than others.

a/ A recent study (Richerson and Holland,2017) also indicates that impacts may be amplified and duration of impacts lengthened if vessels leave the fishery.

6.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS OF MANAGEMENT STRATEGY ALTERNATIVES CONSIDERED

6.1 Introduction

This chapter will analyze the environmental impacts of the alternatives on the resources that would be more than minimally affected by the proposed action. This is a required component to adopt this integrated document as an environmental assessment under NEPA. The proposed action will have no impact on fish and fisheries other than salmon. In addition to targeted salmon stocks, the proposed action may have impacts on marine mammals, ESA-listed salmon stocks, tribal cultural resources, and environmental justice, which are discussed in the following subsections. Several resources included in the Affected Environment are not analyzed in detail in this chapter, because they would not be more than minimally affected by the proposed action and differences among effects of the alternatives are insubstantial. These resources, and the effects of this action on them, are described below:

- Non-target fish species – Fisheries for halibut, coastal pelagic, groundfish, albacore, and invertebrates are all managed separately from salmon fisheries. Species targeted by these fisheries are rarely, if ever, encountered in the salmon fishery. Effort shift among fisheries occurs, but is driven by factors that are largely unrelated to the proposed action, e.g. market forces. Overfished species of groundfish are generally not contacted in the ocean salmon fishery, thus are not expected to be affected by this action. Therefore, we do not expect the proposed action to have more than minimal impacts on non-target fish species.

- Seabirds – Some seabirds prey on juvenile salmon, thus salmon fisheries have the potential to reduce prey available to seabirds by removing adult salmon that could otherwise spawn and produce additional juveniles. Council-area salmon fisheries are managed to meet spawning escapement goals for adult salmon. It is unlikely that the proposed action would have more than a minimal, if any, effect on the availability of juvenile salmon for seabirds, as environmental effects likely limit juvenile abundance more than the proposed action.

- Ocean and coastal habitats and ecosystem function – Ocean salmon fisheries do not disturb bottom habitat; therefore, the proposed action would not have any effect on the physical environment. The removal of adult salmon by the ocean fisheries is not considered to significantly affect the lower trophic levels or the overall marine ecosystem because salmon are not the only or primary predator in the marine environment (NMFS 2003; Appendix B). Spawning escapement goals for salmon stocks are set in the FMP and would not be affected by the Proposed Action; although the limited exploitation rate under Alternative II could result in increased escapement during rebuilding, the estimated time to rebuild under this alternative is five years, compared with six years under Alternative I, after which the exploitation rate goal returns to that specified in the FMP. Therefore, in addition to having no impact on the physical habitat, the Proposed Action is not expected to impact marine nutrient transport beyond a minimal and temporary amount. Therefore, no significant impacts are expected on biodiversity or ecosystem function from the alternatives analyzed in this EA.

The action area for the proposed action is the exclusive economic zone (EEZ), from three to 200 miles offshore of the coasts of Washington and Oregon, from the U.S./Canada border to Cape

Falcon, Oregon. The analysis area extends beyond the action area to include state waters, ports in these states that receive landings from these ocean salmon fisheries, communities and tribes that engage in fishing in state waters, and rivers that salmon use to migrate towards their spawning grounds in our analyses for economics (Chapter 5, above), tribal cultural resources, and environmental justice.

The STT's recommendations to the Council are presented in Chapter 4 of this integrated document. These recommendations include actions that are required under the FMP, but which fall outside the scope of an MSA rebuilding plan and, therefore, are not part of NMFS' required action to approve a rebuilding plan under the NSA. Section 4.2 presents the alternatives considered by the Council for the MSA rebuilding plan to be recommended to NMFS for approval by the Secretary of Commerce (Secretary). Therefore, the analyses in this chapter are limited to the environmental impacts of the alternatives in section 4.2 only. Other recommendations may be acted upon at the Council's discretion, but are not considered part of the MSA rebuilding plan for SRFC and will not be included in the approval decision by the Secretary.

6.2 Targeted salmon stocks

6.2.1 Affected environment

Ocean salmon fisheries in the analysis area target Chinook and coho salmon.

The Council manages several stocks of Chinook and coho salmon under the FMP (PFMC 2016). In the ocean, stocks of salmon comingle which results in mixed-stock fisheries. Non-target stocks, including ESA-listed stocks, will be encountered in mixed-stock fisheries. The Council's Salmon Technical Team (STT) models the degree to which target and non-target stocks are impacted by proposed fisheries, and the Council uses tools such as harvest restrictions, time and area closures, and mark-selective fisheries to limit impacts to non-target stocks (PFMC and NMFS 2017).

In the analysis area, the primary management tools are time and area closures and recreational bag limits; some fisheries also have quotas. The primary salmon stocks targeted in the analysis area are: Lower Columbia River hatchery fall-run Chinook salmon, Columbia River Spring Creek Hatchery fall-fun Chinook salmon, and Columbia River late hatchery coho stocks. Coastal coho stocks also contribute to fisheries in the analysis area, but individual stock contributions are minor. Fisheries in the analysis area are managed to meet FMP conservation objectives for these stocks, and to comply with ESA consultation requirements for any ESA-listed salmon stocks that are affected by salmon fisheries in the analysis area.

Detailed information on spawning escapement and fisheries impacts on salmon stocks are reported in the Council's annual Stock Assessment and Fishery Evaluation (SAFE) document, known as the Annual Review of Ocean Salmon Fisheries. These documents are available on the Council's website (https://www.pcouncil.org/safe-documents-3/).

6.2.2 Environmental consequences of alternatives on target salmon stocks

Impacts to targeted salmon stocks are limited by reference points in the FMP, including conservation objectives, MSST, MFMT, and annual catch limits (ACLs). Council area fisheries north of Cape Falcon, Oregon, are managed under species-specific quotas for Chinook and coho salmon. Quotas and annual management measures are set preseason to meet these reference points for all targeted stocks.

Alternative I (Status Quo) – The Status Quo Alternative is the NEPA No-action Alternative. Under this alternative, the Council would continue to manage fisheries according to the abundance-based stepped harvest rates of the PST management regime and the related SDC that have been in effect since they were implemented under FMP Amendment 16 in 2012 (see section 2.4, above; see also table 3-1 and figure 3-3 in the FMP (PFMC 2016)). Table 3.3.1.a. in this EA shows coho harvests in ocean salmon fisheries for years 2014 through 2018. Table 2.0.a. shows JDF coho spawning escapement for years 2000 through 2017, which is highly variable from year to year. Under Alternative I, the environmental consequences on target salmon stocks from Council-area fisheries in the analysis area would be similar to what has occurred since 2012.

Alternative II (Limit Exploitation Rate) – Under Alternative II, Southern U.S. fisheries (i.e., ocean and inland fisheries south of the U.S./Canada border) would be limited to an annual exploitation rate on JDF coho of 10 percent, irrespective of abundance forecast. Escapement goals in Council area fisheries would not be impacted. Table 4.5.a. in this EA shows that Alternative II would likely result in rebuilding JDF coho in five years, compared to six years under Alternative I.

NMFS understands that there is a level of uncertainty around environmental conditions that could affect T_{target} under any alternative. In section 3.5, we describe that poor ocean conditions led to poor marine survival JDF coho for the broods that lead to the overfished determination. Therefore, although the modeling indicates we would expect JDF coho to rebuild in 5 years under Alternative II, compared with six years under Alternative I, environmental factors could negate those expectations. Irrespective of that uncertainty, table 4.5.a in this document shows a better than 70 percent probability that under either of the two alternatives, the JDF coho stock would be rebuilt by year nine.

6.3 Marine mammals

6.3.1 Affected environment

A number of non-ESA-listed marine mammal species occur in the analysis area. The non-ESA-listed marine mammal species that are known to interact with ocean salmon fisheries are California sea lion (*Zalophus californianus*) and harbor seals (*Phoca vitulina*), both species will feed on salmon, when available, and have been documented preying on hooked salmon in commercial and recreational fisheries (e.g., Weise and Harvey 1999). Other pinnipeds, including Steller sea lions (*Eumetopias jubatus*), also occur in the area and may also interact with the ocean salmon fisheries, but there is currently no available information on such interactions. All marine mammals are protected under the Marine Mammal Protection Act (MMPA). Ocean salmon fisheries employ hook-and-line "troll" gear and are classified under NMFS' MMPA List of Fisheries as Category III (85 FR 21079, April 16, 2020), indicating there is no record of substantive impacts to marine mammals from these fisheries (MMPA 118(c)(1)). Of the ESA-listed marine mammals that occur in the analysis area, only Southern Resident killer whales (SRKW) (a distinct population segment (DPS) of Orcinus orca) are likely to be affected by salmon fisheries.

Salmon fisheries conducted under the FMP may directly affect SRKW through interactions with vessels and gear, and indirectly affect them by reducing prey availability. The Council is currently considering the effects of the FMP on SRKW through an ad hoc workgroup (SRKW workgroup). The SRKW Workgroup risk assessment report, presented at the Council's March 2020 meeting, provides the most current information on SRKW and their predator-prey interaction with Pacific salmon (the report can be found online at: https://www.pcouncil.org/documents/2020/02/e-3-a-srkw-workgroup-report-1-electronic-only.pdf/).

NMFS completed a consultation on the effects of implementing the Council's 2020 ocean salmon management measures on SRKW and their current and proposed critical habitat. The biological opinion, dated April 29, 2020, considered interactions with vessels and gear, and effects on prey availability. The biological opinion concluded that effects from the Council's 2020 salmon fisheries are not likely to jeopardize the continued existence of the SRKW DPS or destroy or adversely modify its designated critical or proposed habitat. The 2020 salmon fisheries were consistent with the Council's proposed rebuilding plan for Juan de Fuca coho.

The SRKW workgroup is continuing to consider a long-term approach and may make further recommendations to the Council. NMFS intends to complete a multi-year biological opinion on the effects of implementing the FMP on SRKW. The annual management measures for Council salmon fisheries are developed to be consistent with all ESA biological opinions. In any year that the terms of the biological opinion for SRKW are more constraining on the fishery than the Juan de Fuca coho rebuilding plan, the management measures for that year would be developed to be consistent with the SRKW biological opinion and consistent with the ESA.

6.3.2 Environmental consequences of the alternatives on marine mammals

Alternative I (Status Quo) – Under the Status Quo alternative, impacts on marine mammals would be expected to be the same as they have been in recent years and not change the amount of salmon available as prey to marine mammals. Ocean salmon hook-and-line fisheries would continue to be Category III under the MMPA and the harvest of salmon in Council-managed fisheries would continue to be guided by the existing control rule and FMP reference points. Additionally, with respect to ESA-listed marine mammals, fisheries would be managed consistent with any requirements included in current or future biological opinions.

Alternative II (S_{MSY} Buffer) – Under Alternative II, ocean salmon hook-and-line fisheries would continue to be Category III under the MMPA. Alternative II would have no impact on harvest of Chinook salmon in Council-managed salmon fisheries and would have limited impact on harvest of coho salmon in Council-managed salmon fisheries during rebuilding. Rebuilding time is estimated at five years under Alternative II, meaning the limited exploitation rate would be in effect temporarily before reverting to the status quo; therefore; therefore, any effect on marine mammals would be short-term. Additionally, with respect to ESA-listed marine mammals, fisheries would be managed consistent with any requirements included in current or future biological opinions. Therefore, we would expect Alternative II to be similar to Alternative I in terms of impacts on marine mammals.

6.4 ESA listed salmon stocks

6.4.1 Affected environment

Several ESUs of Pacific salmon that are ESA-listed as threatened or endangered occur in the areas where Council-managed ocean salmon fisheries occur. As stated above, the only salmon species encountered in fisheries in the action area are Chinook and coho salmon. ESA-listed Chinook and coho salmon ESUs that occur within the analysis area are listed in Table 6.4.1.a.

Table 6.4.1.a. ESA-listed Chinook and coho salmon ESUs that occur within the analysis area.

ESA-listed ESUs		Status	Most recent citation
Chinook (*Oncorhynchus tshawytscha*)			
	Snake River Fall-run	Threatened	70 FR 37160 (June 28, 2005)
	Snake River Spring/Summer-run	Threatened	70 FR 37160 (June 28, 2005)
	Puget Sound	Threatened	70 FR 37160 (June 28, 2005)
	Lower Columbia River	Threatened	70 FR 37160 (June 28, 2005)
	Upper Willamette River	Threatened	70 FR 37160 (June 28, 2005)
	Upper Columbia River Spring-run	Endangered	70 FR 37160 (June 28, 2005)
Coho (*Oncorhynchus kisutch)*			
	Oregon Coastal	Threatened	76 FR 35755 (June 20, 2011)
	Lower Columbia River	Threatened	70 FR 37160 (June 28, 2005)

NMFS has issued biological opinions on the impacts of Council-managed salmon fisheries on ESA-listed salmon. Based on those biological opinions, NMFS provides guidance to the Council during the preseason planning process for setting annual management measures for ocean salmon fisheries based on the coming year's abundance projections. This guidance addresses allowable impacts on ESA-listed salmon. The Council structures fisheries to not exceed those allowable impacts.

NMFS has previously consulted on the effects of Council-area salmon fisheries on the ESA-listed salmon ESUs in the analysis area, and has produced the biological opinions listed in Table 6.4.1.b.

Table 6.4.1.b. NMFS biological opinions regarding ESA-listed salmon ESUs likely to be affected by Council-area ocean salmon fisheries in the analysis area.

Date	Duration	Citation	Species Considered
8-Mar-96	Until reinitiated	NMFS 1996	Snake River spring/summer and fall Chinook (and sockeye)
28-Apr-99	Until reinitiated	NMFS 1999	Oregon Coast coho (S. Oregon/N. California Coast coho, and Central California Coast coho)
30-Apr-01	Until reinitiated	NMFS 2001	Upper Willamette Chinook, Upper Columbia River spring-run Chinook (Lake Ozette sockeye, Columbia River chum, and 10 steelhead ESUs)
30-Apr-04	Until reinitiated	NMFS 2004	Puget Sound Chinook
26-Apr-12	Until reinitiated	NMFS 2012	Lower Columbia River Chinook
9-Apr-15	Until reinitiated	NMFS 2015	Lower Columbia River coho

6.4.2 Environmental consequences of the alternatives on ESA-listed salmon stocks

Salmon fisheries in the analysis area are managed consistent with the requirements of the biological opinions listed in section 6.4.1. Each biological opinion contains an incidental take statement that describes the amount of take anticipated, as well as reasonable and prudent measures or alternatives and terms and conditions to keep authorized take within the permitted amount. In the case of Council-area salmon fisheries, take is generally synonymous with impacts from mortality (either through hooking mortality or incidental harvest). Because salmon fisheries would be managed consistent with current and future biological opinion under any rebuilding plan alternative, there would be no expected difference among the alternatives in terms of impacts on ESA-listed salmon stocks.

6.5 Cultural resources

6.5.1 Affected environment

Salmon are of nutritional, cultural, and economic importance to Native American tribes living in the analysis area. Salmon are harvested by tribes in commercial fisheries and for ceremonial and subsistence purposes. Tribal ceremonial and subsistence uses pertain to fish that are caught non-commercially by members of Washington Coast and Puget Sound treaty tribes for purposes of maintaining cultural viability, providing a valuable food resource, among other traditional foods, in tribal ceremonies, and meeting the nutritional needs of tribal members.

Treaty trust responsibilities require NMFS and the Council to abide by Court orders in the U.S. *v*. Washington (Puget Sound) and Hoh *v*. Baldrige (Washington coast) cases, governing allocation and management of shared salmon resources. Annual negotiations establishing allocation among the tribes, non-Indian fishing sectors, and ocean and inside interests take place in the North of Falcon process.[8]

As described in section 6.2, JDF coho may be harvested in a variety of mixed-stock fisheries throughout the analysis area, including fisheries conducted by several tribes.

6.5.2 Environmental consequences of the alternatives on cultural resources

Alternative I (Status Quo) – Under the Status Quo alternative, impacts on cultural resources would be expected to be the same as in recent years, with inter-annual variability in abundance and negotiations in the North of Falcon process affecting the amount of JDF coho available for tribal harvest.

Alternative II (Limit Exploitation Rate) – Under Alternative II, the tribal and state co-managers will manage to a limited exploitation rate, irrespective of abundance, of 10 percent in Southern U.S. fisheries until rebuilt status is achieved. Table 3.3.3.a. in this document shows that, in recent years (2004-2017), the Southern U.S. exploitation rate for JDF coho exceeded 10 percent in 5 of 14 years, essentially one year in three. Under this alternative, JDF coho are expected to rebuild in five years, compared with six years under Alternative I, and, of available salmon species, only coho harvest would be affected. Extrapolating from table 3.3.3.a., Alternative II should only limit exploitation rate on JDF coho in one or two years during the rebuilding period. Therefore, the environmental consequences of Alternative II on cultural resources are not expected to be substantially different than under the status quo (Alternative I).

[8] See https://wdfw.wa.gov/fishing/management/north-falcon for information on the North of Falcon process.

6.6 Environmental Justice

6.6.1 Affected environment

NMFS must determine which impacts may be adverse under any alternative, and, if so, whether such impacts may be felt disproportionately by environmental justice (EJ) populations.

Resources: EJ populations may be adversely affected by an action's impacts to economics and cultural resources.

EJ Populations: Executive Order 12898 and the Council for Environmental Quality (CEQ) guidance on Environmental Justice under NEPA (CEQ 1997) identifies EJ populations as low income, minority, or those relying on subsistence fishing or farming including Indian tribes.

While Alternative II may result in adverse economic effects through occasional constraints to fisheries, NMFS cannot identify specific communities, by census block, which may be affected by reductions in commercial or recreational fishing. Commercial and recreational fishermen may capture fish, land fish, and reside in different geographic areas. In addition, NMFS cannot distinguish, based on available data, differences in impacts between EJ and reference populations. Economic models apply the overall harvest management framework to the overall area in order to determine effects of harvest reduction. Further dividing the projections to each county would result in a proportional distribution among the counties in that region. Therefore, if the study area includes EJ communities (based on low income or minority thresholds), NMFS cannot determine whether the economic effects of any alternative result in a disproportionate effect on low-income or minority communities.

6.6.2 Environmental consequences of the alternatives on cultural resources

Cultural Resources: Alternative I (Status Quo) is the preferred alternative and is not expected to adversely affect cultural resources for tribal communities as impacts on cultural resources would be expected to be the same as in recent years, with inter-annual variability in abundance and negotiations in the North of Falcon process affecting the amount of Juan de Fuca coho available for tribal harvest.

Economic Resources: Alternative I (Status Quo) is the preferred alternative and is not expected to adversely affect economic resources for EJ populations as the inter-annual variability in abundance of Juan de Fuca coho will continue to determine harvest rates without buffering the exploitation rate, as would occur under Alternative II. Under Alternative II, the exploitation rate cap would result in reduced harvest opportunity, which would have a disproportionately adverse economic effect on tribal fisheries landing in Neah Bay, specifically the Makah Tribe (see section 5.1 and table 5.1.b).

Environmental Justice Determination: Alternative II would result in a disproportionate adverse effect on the Makah Tribe as it pertains to cultural resources.

6.7 Cumulative impacts

This section describes the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions" (40

CFR 1508.7). Salmon are subject to multiple, diverse, and far-reaching effects in both freshwater and marine environments throughout their complex life cycle, while the Council, state, and tribal fisheries take place near the end of this life cycle. Therefore, the Council and NMFS must consider a wide range of cumulative effects in making a decision on this rebuilding plan.

6.7.1 Past, Present, and Reasonably Foreseeable Future Actions

A number of past, present, and reasonably foreseeable future actions affect JDF coho. This section does not identify the individual effects of each past action. CEQ's Guidance on Consideration of Past Actions in Cumulative Effects Analysis (Connaughton 2005) allows agencies to "conduct an adequate cumulative effects analysis by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions."

Noting the change in status of JDF coho, the 2018 Report to Congress on the Status of U.S. Fisheries (NMFS 2019) states that, "Many of the stocks added to the overfishing and overfished list have been impacted by environmental factors or international harvest that the United States has limited ability to control" (NMFS 2019). Section 3.5 of this document, above, summarizes the factors that cumulatively led to a change in JDF coho status, and concludes: "ocean conditions, as reflected in marine survival rates, drive the abundance of adult recruits of this stock more than any other factor, and therefore affect the abundance of spawners more than any other factor."

The temporal scope encompasses past actions that occurred since the FMP was implemented in 1984. The temporal scope of reasonably foreseeable future actions encompasses all known Council, state, and tribal fishery management actions. The dynamic nature of fishery resource management makes it very difficult to predict future decisions or actions; substantive future decisions, such as the annual salmon management measures, will be analyzed in future NEPA documents. Therefore, we do not quantify a temporal scope for the selection of reasonably foreseeable future actions.

The effects of fishery management extend into the future and are unlikely to change until the management action is changed or new management actions are introduced. Therefore, we do not quantify a temporal scope for the effects of future actions but consider the cumulative effects that last beyond the end of the five- to six-year rebuilding period.

<u>Fishery Management Actions</u>

The Council recommends management measures for ocean salmon fisheries annually based on stock forecasts and in accordance with conservation objectives set in the FMP and guidance provided by NMFS for managing impacts to ESA-listed stocks. The Council's recommended management measures must also be consistent with any applicable rebuilding measures. The Council and NMFS use these management measures to continuously shape salmon fisheries impacts on salmon stocks using an intensive preseason and inseason process, as described in chapters 9 and 10 of the FMP (PFMC 2016). JDF coho have never constrained Council-managed fisheries, although Washington coho stocks collectively contributed to constraining ocean fisheries in 2015 through 2018 (table 5.3.a.).

The Council also manages other non-salmon fisheries for their impacts to salmon. For example, the groundfish fishery is subject to ESA-driven salmon bycatch guidelines. Fisheries outside of the Council's jurisdiction also affect salmon spawning escapement – the metric for evaluating salmon stock status. The Council considers impacts from fisheries managed by the states and treaty Indian tribes through the North of Falcon process and Columbia River fisheries managed under U.S. *v*. Oregon Agreement, as well as obligations for fisheries off Alaska and Canada under the Pacific Salmon Treaty (PFMC and NMFS 2017) in setting annual management measures for salmon. These intensive management processes will continue annually as a reasonably foreseeable future action and will ensure that constraining stocks are not overharvested, and that harvest of abundant stocks can be optimized and achieve the most overall benefit to the nation.

Concurrent with developing the JDF coho rebuilding plan, the Council also developed rebuilding plans for Snohomish natural coho and Queets natural coho, which were also determined to be overfished. The Council has recommended the Status Quo Alternative for Queets (T_{target} = 2 years) and the Action Alternative for Snohomish (T_{target} = 3 years).

Non-Fishing Related Actions

Because salmon spend part of their lifecycle in fresh water, they are vulnerable to a broad range of human activities (since humans spend most of their time on land) that affect the quantity and quality of these freshwater environments. These activities are generally well known and diverse. They include physical barriers to migration (such as dams and culverts), changes in water flow and temperature (often a secondary effect of dams or water diversion projects), hatchery management, and degradation of spawning environments (such as habitat modification, changes in water quality, quantity, and hydrology, as well as effects of land use changes, forestry, farming, infrastructure, and urban development).

Non-fishing activities in the marine environment (such as transportation, run-off, aquaculture, and energy development) can introduce chemical pollutants and sewage; and result in changes in water temperature, salinity, dissolved oxygen, and suspended sediment which poses a risk to the affected resources. Human-induced non-fishing activities tend to be localized in nearshore areas and marine project areas. When these activities co-occur, they are likely to work additively or synergistically to decrease habitat quality and may indirectly constrain the sustainability of the managed resources, non-target species, and protected resources. Decreased habitat suitability tends to reduce the tolerance of affected species to the impacts of fishing effort.

The following ongoing and pending actions may further confound the effects of the rebuilding alternatives:

- Climate effects, including changes in river flows and flow variability; stream temperature, sea surface temperature, ocean acidification, and other ocean conditions; and seasonal changes in temperature and precipitation, are affecting salmon. However, our ability to predict future impacts on a specific salmon stock stemming from climate effects remains uncertain. This uncertainty is confounded by the fact that salmon occupy different habitats over their life cycle (tributary, mainstem river, estuary, and marine). Climate effects and subsequent natural adaptation may vary across each of these habitats. For example, early migration of juvenile fish in response to changing river conditions may adversely affect their survival during the marine stage (Crozier et. al 2019).

- During its development of the JDF coho rebuilding plan, the Council received information from NOAA scientists on the poor ocean conditions that affected the California Current Ecosystem and that contributed to poor marine survival of salmon (see section 3.2). Recently, NOAA scientists have identified a new anomaly, designated the Northeast Pacific Marine Heatwave of 2019. NOAA scientists will continue to monitor these conditions and provide fisheries managers and others with information on how the unusually warm conditions could affect the marine ecosystem and fish stocks.[9]

6.7.2 Incremental Cumulative Effects

The following terminology is used to define the incremental effect contributed by each alternative to cumulative impacts:

- Imperceptible: The added effect contributed by the alternative to the cumulative impact is so small that it is impossible or extremely difficult to detect.
- Noticeable: The added effect contributed by the alternative, while evident and observable, is relatively small in proportion to the cumulative impact.
- Substantial: The added effect contributed by the alternative is evident and observable and constitutes a large portion of the cumulative impact.

Biological Resources (target fish, marine mammals, and ESA-listed salmon)

The analysis area for biological resources is the same as the analysis area defined in Section 6.1. Considering past and present actions and environmental conditions, the JDF coho stock is currently in an overfished condition.

As noted in Section 3.5, in recent years (2004-2017) ERs on JDF coho have been below the allowed threshold, yet ERs in 2014 and 2015 did contribute to the stock being classified as overfished. Irrespective of fishing or the selected alternatives, when accounting for reasonably foreseeable future actions, coupled with environmental conditions and normal variations in abundance, there is a greater than 70 percent probability this stock will rebuild within nine years (table 4.5.a.).

Because the stock is expected to rebuild under either of the analyzed alternatives, and the difference between the alternatives is largely negligible, the alternatives have an imperceptible incremental contribution to future cumulative effects.

While Alternative II may have a positive short-term effect (five years) on marine mammals (see Section 6.3.2), the alternatives would have an imperceptible incremental contribution to long-term effects on marine mammals or ESA-listed salmon stocks when accounting for all past, present, and reasonably foreseeable future actions in the analysis area.

Economics

The analysis area for economic resources is the same as the analysis area defined in Section 5, i.e., the economically affected area (north of Cape Falcon, Oregon, to the U.S./Canada border).

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[9] https://www.fisheries.noaa.gov/feature-story/new-marine-heatwave-emerges-west-coast-resembles-blob

As noted in Section 5, quantifying the change in the baseline from historic conditions (the net cumulative effect) is not practical because of the numerous factors that interact to determine future fishing conditions. These conditions are described in Sections 3 and 5 and include variable abundance of JDF coho, fishery closures, trends of other salmon stocks (constraining stocks), shifts to other fisheries, actual time to rebuild, rebuilding of other overfished coho stocks, and a Council season setting process during which various biological, economic, and social factors are balanced in shaping each season and determining fishing opportunities. Therefore, this cumulative effect section, like Section 5, will focus on the differences in the incremental cumulative impacts between the alternatives.

At the scale of the entire west coast, both alternatives have an imperceptible incremental contribution to cumulative economic effects because the projected rebuilding time under the alternatives is five to six years. JDF coho historically contribute little to Council-area fisheries (see table 3.3.3.a and figure 3.3.3.a), most of these fish are caught in terminal and preterminal fisheries in the Strait of Juan de Fuca (see section 3.3.3). Localized, short-term cumulative impacts (at the port, tribe, community, family, or individual levels) are difficult to project, as the fisheries north of Cape Falcon, the analysis area, are usually constrained by stocks other than JDF coho (see chapter 5). NMFS cannot predict these localized cumulative effects, which depend on other local and macroeconomic conditions as well as personal choices that fishermen and local businesses may make.

Cultural Resources

Past, present, and reasonably foreseeable future actions that have adversely affected salmon stocks have also eroded an important cultural resource. The magnitude of this adverse cumulative effect cannot be quantified. Under the analyzed alternatives, the JDF coho stock is expected to rebuild in five or six years. Either alternative would have an imperceptible incremental contribution to this cumulative adverse effect on cultural resources.

Environmental Justice

The expected effects of the alternatives on environmental justice communities, described in Section 6.6, found neither alternative is likely to result in a disproportionate adverse effect on Cultural Resources for Indian tribes during the rebuilding period. Given that cultural harvest over the rebuilding period will be largely dependent on salmon abundance, non-fishing related actions, or climate change, the alternatives would likely have an imperceptible contribution to cumulative adverse environmental justice effects.

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APPENDIX A. STATUS DETERMINATION CRITERIA

The following is an excerpt from the Salmon Fishery Management Plan

3.1 STATUS DETERMINATION CRITERIA

"Overfished. A stock or stock complex is considered ''overfished'' when its biomass has declined below a level that jeopardizes the capacity of the stock or stock complex to produce MSY on a continuing basis."

NS1Gs (600.310 (e)(2)(i)(E))

In establishing criteria by which to determine the status of salmon stocks, the Council must consider the uncertainty and theoretical aspects of MSY as well as the complexity and variability unique to naturally producing salmon populations. These unique aspects include the interaction of a short-lived species with frequent, sometimes protracted, and often major variations in both the freshwater and marine environments. These variations may act in unison or in opposition to affect salmon productivity in both positive and negative ways. In addition, variations in natural populations may sometimes be difficult to measure due to masking by hatchery produced salmon.

3.1.1 General Application to Salmon Fisheries

In establishing criteria from which to judge the conservation status of salmon stocks, the unique life history of salmon must be considered. Chinook, coho, and pink salmon are short-lived species (generally two to six years) that reproduce only once shortly before dying. Spawning escapements of coho and pink salmon are dominated by a single year-class and Chinook spawning escapements may be dominated by no more than one or two year-classes. The abundance of year-classes can fluctuate dramatically with combinations of natural and human-caused environmental variation. Therefore, it is not unusual for a healthy and relatively abundant salmon stock to produce occasional spawning escapements which, even with little or no fishing impacts, may be significantly below the long-term average associated with the production of MSY.

Numerous West Coast salmon stocks have suffered, and continue to suffer, from nonfishing activities that severely reduce natural survival by such actions as the elimination or degradation of freshwater spawning and rearing habitat. The consequence of this man-caused, habitat-based variation is twofold. First, these habitat changes increase large scale variations in stock productivity and associated stock abundances, which in turn complicate the overall determination of MSY and the specific assessment of whether a stock is producing at or below that level. Second, as the productivity of the freshwater habitat is diminished, the benefit of further reductions in fishing mortality to improve stock abundance decreases. Clearly, the failure of several stocks managed under this FMP to produce at an historical or consistent MSY level has little to do with current fishing impacts and often cannot be rectified with the cessation of all fishing.

To address the requirements of the MSA, the Council has established criteria based on biological reference points associated with MSY exploitation rate and MSY spawning escapement. The criteria are based on the unique life history of salmon and the large variations in annual stock abundance due to numerous environmental variables. They also take into account the uncertainty and imprecision surrounding the estimates of MSY, fishery impacts, and spawner escapements. In recognition of the unique salmon life history, the criteria differ somewhat from the general guidance in the NS1 Guidelines (§600.310).

3.1.4 Overfished

"For a fishery that is overfished, any fishery management plan, amendment, or proposed regulations… for such fishery shall (A) specify a time period for ending overfishing and rebuilding the fishery that shall:(i) be as short as possible, taking into account the status and biology of any overfished stocks of fish, the needs of the fishing communities, recommendations by international organizations in which the United States participates, and the interaction of the overfished stock within the marine ecosystem; and (ii) not exceed 10 years, except in cases where the biology of the stock of fish, other environmental conditions, or management measures under an international agreement in which the United States participates dictate otherwise…."

Magnuson-Stevens Act, §304(e)(4)

A stock will be considered overfished if the 3-year geometric mean of annual spawning escapements falls below the MSST, where MSST is generally defined as $0.5*S_{MSY}$ or $0.75*S_{MSY}$, although there are some exceptions (Table 3-1). Overfished determinations will be made annually using the three most recently available postseason estimates of spawning escapement.

3.1.4.1 Council Action

When the overfished status determination criteria set forth in this FMP have been triggered, the Council shall:

1) notify the NMFS NWR administrator of this situation;
2) notify pertinent management entities;
3) structure Council area fisheries to reduce the likelihood of the stock remaining overfished and to mitigate the effects on stock status;
4) direct the STT to propose a rebuilding plan for Council consideration within one year.

Upon formal notification from NMFS to the Council of the overfished status of a stock, a rebuilding plan must be developed and implemented within two years.

The STT's proposed rebuilding plan shall include:

1) an evaluation of the roles of fishing, marine and freshwater survival in the overfished determination;
2) any modifications to the criteria set forth in section 3.1.6 below for determining when the stock has rebuilt,
3) recommendations for actions the Council could take to rebuild the stock to S_{MSY}, including modification of control rules if appropriate, and;
4) a specified rebuilding period.

In addition, the STT may consider and make recommendations to the Council or other management entities for reevaluating the current estimate of S_{MSY}, modifying methods used to forecast stock abundance or fishing impacts, improving sampling and monitoring programs, or changing hatchery practices.

Based on the results of the STT's recommended rebuilding plan, the Council will adopt a rebuilding plan for recommendation to the Secretary. Adoption of a rebuilding plan will require implementation either through an FMP amendment or notice and comment rule-making process. Subject to Secretarial approval, the Council will implement the rebuilding plan with appropriate actions to ensure the stock is rebuilt in as short a time as possible based on the biology of the stock but not to exceed ten years, while taking into consideration the needs of the commercial, recreational and tribal fishing interests and coastal communities. The existing control rules provide a default rebuilding plan that targets spawning escapement at or above MSY, provided sufficient recruits are available, and targets a rebuilding period of one generation (two years for pink salmon, three years for coho, and five years for Chinook). If sufficient recruits are not available to achieve spawning escapement at or above MSY in a particular year, the control rules provide for the potential use of *de minimis* exploitation rates that allow continued participation of fishing communities while minimizing risk of overfishing. However, the Council should consider the specific circumstances surrounding an overfished determination and ensure that the adopted rebuilding plan addresses all relevant issues.

Even if fishing is not the primary factor in the depression of the stock, the Council must act to limit the exploitation rate of fisheries within its jurisdiction so as not to limit rebuilding of the stock or fisheries. In cases where no action within Council authority can be identified which has a reasonable expectation of contributing to the rebuilding of the stock in question, the Council will identify the actions required by other entities to recover the depressed stock. Due to a lack of data for some stocks, environmental variation, economic and social impacts, and habitat losses or problems beyond the control or management authority of the Council, it is possible that rebuilding of depressed stocks in some cases could take much longer than ten years. The Council may change analytical or procedural methodologies to improve the accuracy of estimates for abundance, harvest impacts, and MSY escapement levels, and/or reduce ocean harvest impacts when it may be effective in stock recovery. For those causes beyond Council control or expertise, the Council may make recommendations to those entities which have the authority and expertise to change preseason prediction methodology, improve habitat, modify enhancement activities, and re-evaluate management and conservation objectives for potential modification through the appropriate Council process.

In addition to the STT assessment, the Council may direct its Habitat Committee (HC) to work with federal, state, local, and tribal habitat experts to review the status of the essential fish habitat affecting the overfished stock and, as appropriate, provide recommendations to the Council for restoration and enhancement measures within a suitable time frame. However, this action would be a priority only if the STT evaluation concluded that freshwater survival was a significant factor leading to the overfished determination. Upon review of the report from the HC, the Council will consider appropriate actions to promote any solutions to the identified habitat problems.

3.1.5 Not Overfished-Rebuilding

After an overfished status determination has been triggered, once the stock's 3-year geometric mean of spawning escapement exceeds the MSST, but remains below S_{MSY}, or other identified rebuilding criteria, the stock status will be recognized as "not overfished-rebuilding". This status level requires no Council action, but rather is used to indicate that stock's status has improved from the overfished level but the stock has not yet rebuilt.

3.1.6 Rebuilt

The default criterion for determining that an overfished stock is rebuilt is when the 3-year geometric mean spawning escapement exceeds S_{MSY}; the Council may consider additional criteria for rebuilt status when developing a rebuilding plan and recommend such criteria, to be implemented subject to Secretarial approval.

Because abundance of salmon populations can be highly variable, it is possible for a stock to rebuild from an overfished condition to the default rebuilding criterion in as little as one year, before a proposed rebuilding plan could be brought before the Council.

In some cases it may be important to consider other factors in determining rebuilt status, such as population structure within the stock designation. The Council may also want to specify particular strategies or priorities to achieve rebuilding objectives. Specific objectives, priorities, and implementation strategies should be detailed in the rebuilding plan.

3.1.6.1 Council Action

When a stock is determined to be rebuilt, the Council shall:

1) notify the NMFS NWR administrator of its finding, and;
2) notify pertinent management entities.

3.1.7 Changes or Additions to Status Determination Criteria

Status determination criteria are defined in terms of quantifiable, biologically-based reference points, or population parameters, specifically, S_{MSY}, MFMT (F_{MSY}), and MSST. These reference points are generally regarded as fixed quantities and are also the basis for the harvest control rules, which provide the operative guidance for the annual preseason planning process used to establish salmon fishing seasons that achieve OY and are used for status determinations as described above. Changes to how these status determination criteria are defined, such as MSST = $0.50*S_{MSY}$, must be made through a plan amendment. However, if a comprehensive technical review of the best scientific information available provides evidence that, in the view of the STT, SSC, and the Council, justifies a modification of the estimated values of these reference points, changes to the values may be made without a plan amendment. Insofar as possible, proposed reference point changes for natural stocks will only be reviewed and approved within the schedule established for salmon methodology reviews and completed at the November meeting prior to the year in which the proposed changes would be effective and apart from the preseason planning process. SDC reference points that may be changed without an FMP amendment include: reference point objectives for hatchery stocks upon the recommendation of the pertinent federal, state, and tribal management entities; and Federal court-ordered changes. All modifications would be documented through the salmon methodology review process, and/or the Council's preseason planning process.

APPENDIX B. PUGET SOUND RECREATIONAL FISHERY REGULATIONS

Puget Sound Recreational Fisheries

Provided below are descriptions of recreational fishing seasons for coho as planned preseason during the state-tribal North of Falcon process, for each of the Puget Sound marine areas during the 2014-15, 2015-16, and 2016-17 seasons (the period from July 1, 2014 through June 30, 2017). Recreational fisheries were implemented as planned preseason unless specified otherwise via footnotes in Table B.1.

Areas 5 and 6

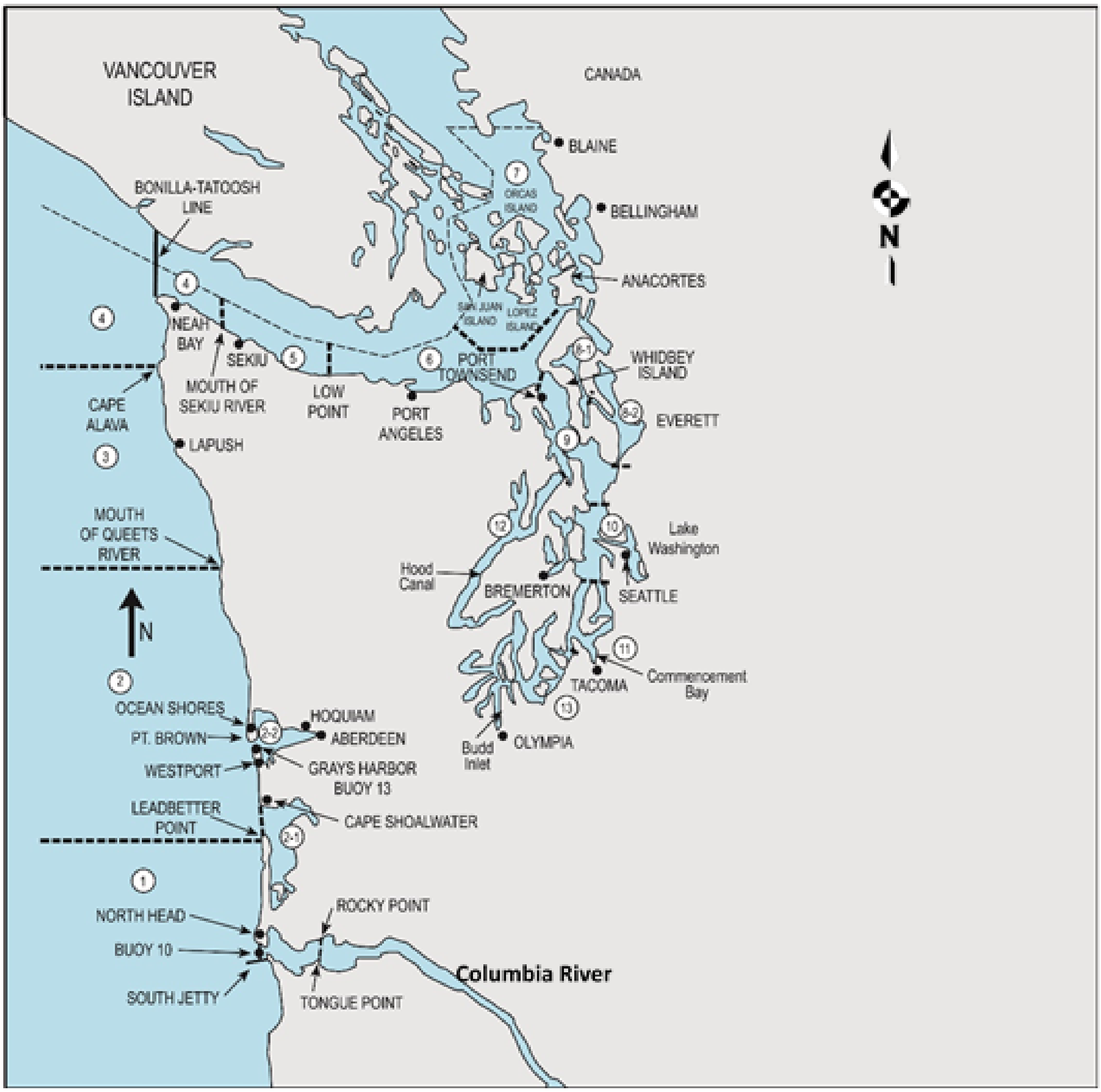
In the Strait of Juan de Fuca, both Area 5 (Sekiu and Pillar Point) and Area 6 (East Juan de Fuca Strait) were open to mark-selective coho fishing during the summer of 2014 and 2015 from July 1-September 30. In Area 5 only, non-selective coho fishing was allowed from September 19-25 during 2014, and on the specific dates of September 12-14, 19-21, and 26-27 in 2015. Additionally, Area 5 was open during October 1-31 for mark-selective coho fishing in 2014 and for non-selective coho fishing in 2015. In Area 6, non-selective coho fishing was open in the month of October in both 2014 and 2015. During the winter and spring seasons, Area 5 was open for non-selective coho fishing from February 16 - April 10 in 2015, and from February 16 - April 30 in 2016. During the 2016-17 season, there were no fisheries allowing coho salmon retention in Areas 5 and 6.

Area 9

In Area 9 (Admiralty Inlet), non-selective coho fishing was open from July 1 through November 30, and again from January 16 through April 15, in both the 2014-15 and 2015-16 seasons. In contrast, during the 2016-17 season, there were no fisheries allowing coho salmon retention in Area 9.

Area 10

In Area 10 (Seattle/Bremerton area), non-selective coho fishing was open from July 1 through January 31 in both the 2014-15 and 2015-16 seasons. In contrast, during the 2016-17 season, there were no fisheries allowing coho salmon retention in Area 10. The Elliott Bay terminal area near Seattle was closed for all salmon retention during summer 2014 and 2016 but open in 2015 for non-selective coho and pink salmon fishing from August 14-31 (Fridays through Sundays only) in 2015.



Map of Western Washington, showing the Marine Catch Areas of Puget Sound (Areas 5 through 13) and the Washington coast (Areas 1 through 4).

Appendix Table B.1. Recreational Coho Fishing Seasons in Puget Sound Marine Areas 5, 6, 9, and 10 during the period from July 1, 2014 through June 30, 2017. Recreational fisheries were implemented as planned preseason unless noted otherwise below via footnotes (a/ through l/).

Area	Fishery Type [1/]	Dates of Season, by Fishery Year (July 1 - June 30)		
		2014-15	**2015-16**	**2016-17**
5	NR	n/a	n/a	July 1-Aug 15; Feb 16-Apr 30
	NSF	Sept 19-25; Feb 16-Apr 10	Sept 12-14, 19-21, 26-27; Oct 1-31; Feb 16-Apr 30	n/a
	MSF	July 1-Sept 18; Sept 26-30; Oct 1-31	July 1-Sept 11; Sept 15-18, 22-25, 28-30	n/a
	Closed	Nov 1-Feb 15; Apr 11-June 30	Nov 1 - Feb 15; May 1-June 30	Aug 16-Feb 15; May 1-June 30
6	NR	n/a	n/a	July 1-Aug 15; Dec 1-Apr 30
	NSF	Oct 1-31; Dec 1-Apr 10	Oct 1-31; Dec 1-Apr 10 [d/]	n/a
	MSF	July 1-Sept 30	July 1-Sept 30	n/a
	Closed	Nov 1-30; Apr 11-June 30	Nov 1-30; Apr 11-June 30	Aug 16-Nov 30; May 1-June 30
9	NR	n/a	n/a	July 1-Aug 15; Nov 1-30; Jan 16-Apr 15
	NSF	July 1-Nov 30; Jan 16-Apr 15	July 1-Nov 30 [b/]; Jan 16-Apr 15 [g/]	n/a
	MSF	n/a	n/a	n/a
	Closed	Dec 1-Jan 15; April 16-June 30	Dec 1-Jan 15; April 16-June 30	Aug 16-Oct 31; Dec 1-Jan 15; May 1-June 30
10	NR	June 1-30	June 1-30	July 1-Aug 15; Nov 1-Feb 28 [l/]; June 1-30
	NSF	July 1 - Jan 31	July 1 - Jan 31 [c/]	n/a
	MSF	n/a	n/a	n/a
	Closed	Feb 1 - May 31	Feb 1 - May 31	Aug 16-Oct 31; Mar 1-May 30
[1/] Definitions of fishery types:	NR= Non-retention regulation for coho salmon. Anglers may fish for other salmon or bottomfish species, but may not retain coho salmon.			
	NSF = Non-selective fishery for coho salmon. Anglers may keep either hatchery marked (adipose fin-clipped) or unmarked (adipose fin intact) coho. Daily bag limit is typically 2 salmon (at most 2 coho).			
	MSF = Mark-selective fishery for coho salmon. Anglers may keep hatchery marked (adipose fin-clipped) coho but must release unmarked (adipose fin intact) coho. Daily bag limit is typically 2 hatchery coho.			
	Closed = Closed for coho and all other salmon species.			

In-season changes:

[b/] Area 9, summer 2015:

Effective August 6, 2015, the sub-area in northern Hood Canal (from south and west of a line from Foulweather Bluff to Olele Point to the Hood Canal Bridge) was closed to salmon fishing, except angling for salmon from shore was permissible, from the Hood Canal Bridge to the northern boundary of Salsbury Point Park. Daily limit was 2 salmon plus 2 additional pink salmon. Reason for in-season change: to protect mid-Hood Canal Chinook per state-tribal management plans agreed to during the North of Falcon preseason process.

Effective November 1 through November 30, 2015, Area 9 closed for Chinook and coho salmon retention. Reason for in-season change: Area 9 winter mark-selective Chinook fishery had higher than expected sublegal-size Chinook encounters. Puget Sound coho run sizes were below preseason forecasts; therefore, non-retention of coho was required beginning November 1, 2015.

[c/] Area 10, winter 2015-16:

Effective October 19, 2015, Area 10 closed for salmon fishing. Area 10 opened again on October 28 for chum salmon retention only -- coho and Chinook still had to be released. Effective December 1, 2015 through January 31, 2016, Area 10 closed again for salmon fishing. Reason for in-season changes: Chinook encounters in the Area 10 winter Chinook MSF had reached preseason expectations; needed to ensure compliance with conservation objectives and agreed-to management plans.

[d/] Area 6, spring 2016:

Area 6 closed for salmon fishing effective February 22 through April 10, 2016 to slow down the number of Chinook encounters in the Area 6 Chinook MSF and comply with agreed-to management plans. From March 12 through March 18, however, the area opened again for a short time with a daily limit of 2 salmon, no more than 1 hatchery Chinook (release wild Chinook) for limited fishing opportunity.

Area 9, spring 2016:

Area 9 closed to salmon fishing effective April 11 through April 15, 2016. Reason for in-season change: encounters of Chinook in the Area 9 Chinook MSF had reached preseason expectations; needed to ensure compliance with conservation objectives and agreed-to management plans.

[h/] Multiple Areas, spring 2016

Effective May 1 through June 24, 2016, the following areas were closed to salmon fishing (changed from coho non-retention to closed): Marine Area 8-2 (including Tulalip Terminal Area Fishery), Marine Area 11, Marine Area 13, and year-round piers (Marine Areas 9, 10, 11, and 13). Reason for change: State-tribal co-managers were delayed in coming to agreement during the 2016 North of Falcon process. Endangered Species Act (ESA) coverage for Chinook and steelhead impacts expired April 30, 2016; therefore, starting May 1, 2016, scheduled fisheries did not have the needed federal ESA permit and could not be implemented. Effective June 24, 2016, these areas opened to salmon fishing per permanent rules due to receiving the federal ESA permit.

[l/] Area 10, winter-spring 2017:

Area 10 closed to salmon fishing effective January 23, 2017 through February, 28, 2017 (changed from coho non-retention to closed), except for year-round piers. Reason for in-season change: encounters of Chinook reached preseason expectations in the Area 10 Chinook MSF; needed to ensure compliance with conservation objectives and agreed-to management plans.

APPENDIX C. MODEL DESCRIPTION

Introduction

Salmon rebuilding plans must include, among other requirements, a specified rebuilding period. In addition, the National Environmental Policy Act (NEPA) analysis of rebuilding plans requires the development of rebuilding plan alternatives. In past assessments, the rebuilding period and alternative rebuilding plans were developed using expert knowledge, with no particular quantitative assessment. Beginning in 2018, the Salmon Technical Team (STT) developed a simple tool to assess the probability of a stock achieving rebuilt status in each year following an overfished declaration. Here we describe this model and provide additional results for the Strait of Juan de Fuca natural coho salmon stock.

The methods described here are for a single replicate simulation.

Simulated abundance $\log(N_t)$ is a random draw from the distribution

$$Y_t \sim \text{Normal}\left[\log(\bar{\text{S}}) - 0.5\sigma^2_{\log(\text{S})}, \sqrt{\sigma^2_{\log(\text{S})}}\right] \quad (1)$$

where $\bar{\text{S}}$ is the arithmetic mean of the observed Strait of Juan de Fuca coho ocean abundance time series and $\sigma^2_{\log(\text{S})}$ is the variance of the log-transformed abundance time series. Simulated log-scale abundance in year *t* is then back-transformed to the arithmetic scale, $N_t = \exp[\log(N_t)]$.[10]

The forecast abundance $\hat{N}_t$ is drawn from a lognormal distribution,

$$\hat{N}_t \sim \text{Lognormal}[\log(N_t) - 0.5\sigma^2_{\log(\hat{N})},\ \sigma_{\log(\hat{N})}] \quad (2)$$

with the bias corrected mean and standard deviation specified on the log scale. The log-scale standard deviation was defined as

$$\sigma_{\log(\hat{N})} = \sqrt{\log\left(1 + \text{CV}^2_{\hat{N}}\right)} \quad (3)$$

with $\text{CV}_{\hat{N}}$ representing the coefficient of variation for the abundance forecast. $\text{CV}_{\hat{N}}$ is a model parameter that defines the degree of abundance forecast error.

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[10] The method described here to simulate pre-fishery ocean abundance differs from the method used for the other overfished coho (Queets and Snohomish) and Chinook (Sacramento and Klamath fall) stocks. For those stocks, there was evidence for positive lag-1 autocorrelation in the log-transformed abundance. For Strait of Juan de Fuca natural coho, there is no evidence for positive lag-1 autocorrelation in log-transformed abundance; the estimated autocorrelation coefficient is -0.038. The method employed here is equivalent to the method used to simulate abundance for the other overfished stocks assuming an autocorrelation coefficient (ρ) of zero.

The forecast abundance $\widehat{N}_t$ is applied to a harvest control rule to determine the allowable exploitation rate, $\hat{F}_t$. However, for Strait of Juan de Fuca coho, where the abundance or status of other stocks in the fishery can determine the exploitation rate in many fisheries, including Council-area fisheries, the use of an abundance-based control rule would poorly describe the degree of exploitation on this stock. As a result, $\hat{F}_t$ was specified for Alternative I by randomly sampling, with replacement, from the 2004-2007 set of postseason exploitation rate estimates. For Alternative II, $\hat{F}_t$ was determined by randomly sampling, with replacement, from past exploitation rate estimates, subject to the Southern United States component of the exploitation rate being capped at a maximum of 0.10. The hat notation for $\hat{F}$ indicates that this exploitation rate is a target exploitation rate, not the realized exploitation rate experienced by the stock.

Adult spawner escapement E_t is thus

$$E_t = N_t \times (1 - F_t) \tag{4}$$

where N_t is the "true" abundance and F_t is the realized exploitation rate. The realized exploitation rate is a random draw from the beta distribution

$$F \sim \text{Beta}(\alpha, \beta) \tag{5}$$

with parameters

$$\alpha = \frac{1 - \hat{F}_t(1 + \text{CV}_F^2)}{\text{CV}_F^2} \tag{6}$$

and

$$\beta = \frac{\frac{1}{\hat{F}_t} - 2 + \hat{F}_t + (\hat{F}_t - 1)\text{CV}_F^2}{\text{CV}_F^2}. \tag{7}$$

The coefficient of variation for the exploitation rate implementation error, CV_F, is a model parameter that determines the degree of error between the target and realized exploitation rates.

Because escapement is estimated with error, escapement estimates $\hat{E}_t$ are drawn from a lognormal distribution,

$$\hat{E} \sim \text{Lognormal}[\log(E_t) - 0.5\sigma^2_{\log(\hat{E})},\ \sigma_{\log(\hat{E})}] \tag{8}$$

where the bias corrected mean and standard deviation are specified on the log scale. The log-scale standard deviation was computed in the same manner as Equation 3.

The procedure described above is repeated for each year (year 1 [2018] through year 10), and each replicate. A stock is assumed to be rebuilt when the geometric mean of $\hat{E}$ computed over the previous three years exceeds the maximum sustainable yield spawner escapement, S_{MSY}. The probability of achieving rebuilt status in year *t* is the cumulative probability of achieving a 3-year geometric mean greater than or equal to S_{MSY} by year *t*.

Results

Results for Strait of Juan de Fuca coho presented here are the product of 10,000 replicate simulations of 10 years. The probability of being rebuilt in year t = 1 is the proportion of the 10,000 simulations that resulted in the geometric mean of the estimated escapement in t = -1 (8,435: the 2016 natural adult escapement), the estimated escapement in t = 0 (5,530: the 2017 natural adult escapement), and the simulated escapement estimate in year t = 1 (2018) exceeding $S_{\text{MSY}} = 11{,}000$. For t = 2, the probability of being rebuilt is the probability that the stock was rebuilt in either t = 1 or t = 2.

Table 4.5.a and Figure 4.5.a in the body of the report display the probabilities of achieving rebuilt status under two rebuilding alternatives: (I) status quo and (II) under a reduced exploitation rate. A no-fishing scenario was also evaluated to establish T_{MIN}. For these simulations the following parameter values were assumed: $\text{CV}_{\hat{N}} = 0.2$, $\text{CV}_{\hat{E}} = 0.2$, and $\text{CV}_{F} = 0.1$. The parameter values were chosen because they produce plausible levels of abundance forecast error, escapement estimation error, and implementation error for realized exploitation rates.

Rebuilding probabilities were also computed for the status quo control rule under an increased CV of the abundance forecast error ($\text{CV}_{\hat{N}} = 0.6$), the escapement estimation error CV ($\text{CV}_{\hat{E}} = 0.5$), and the CV of the exploitation rate implementation error (CV_{F} = 0.2). Figure 1 displays distributions depicting the levels of abundance forecast error, escapement estimation error, and exploitation rate implementation error given the base case CVs and the CVs used for the alternative scenarios. Figure 2 displays results for these alternative scenarios under the status quo control rule. Overall, the probability of achieving rebuilt status by year is relatively insensitive to increased values of these parameters.

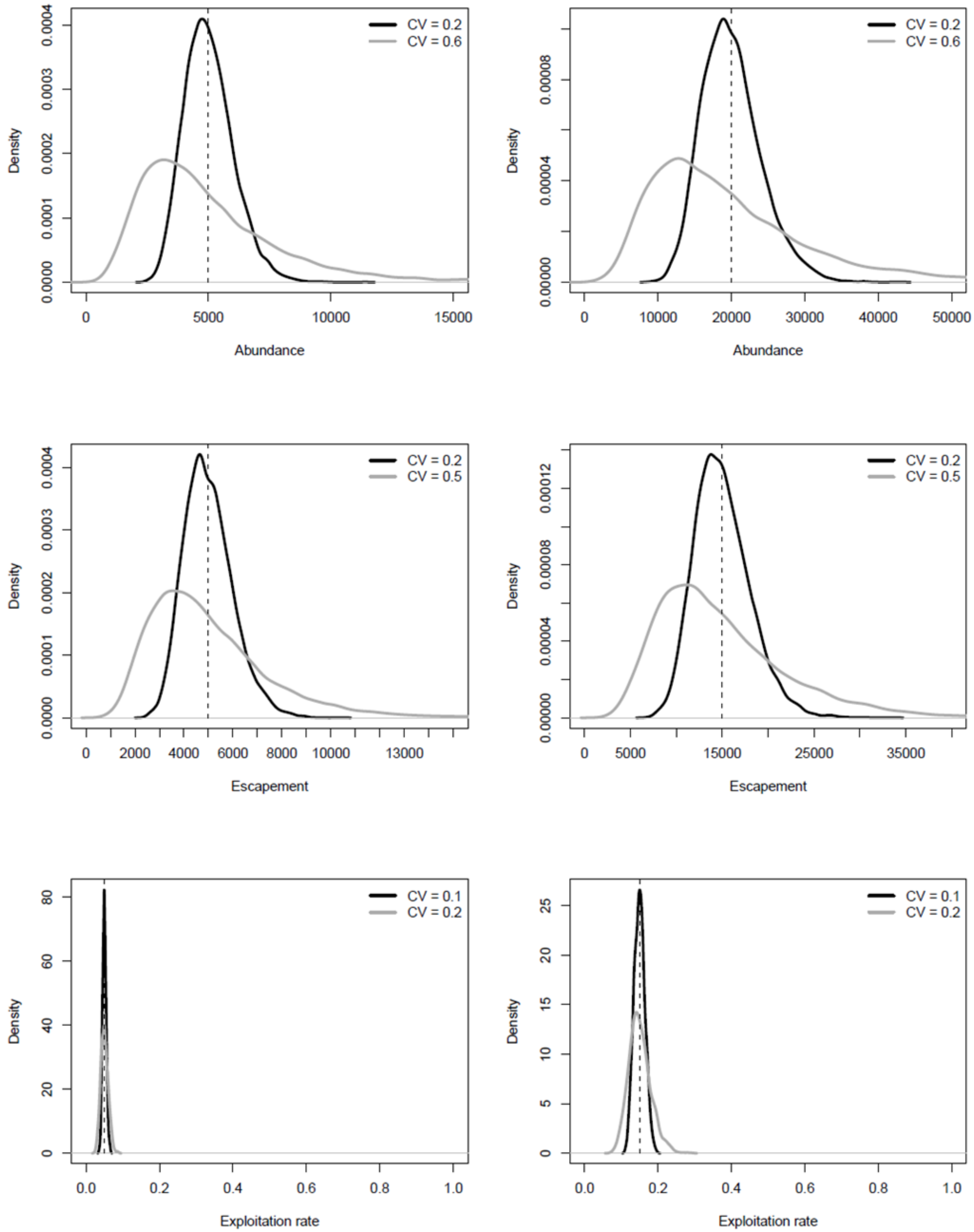

Figure 1. Distributions of the forecast abundance (top row), estimated escapement (middle row), and realized exploitation rate (bottom row) under different levels of known abundance, known escapement, and predicted exploitation rate. Known values are indicated by vertical dashed lines.

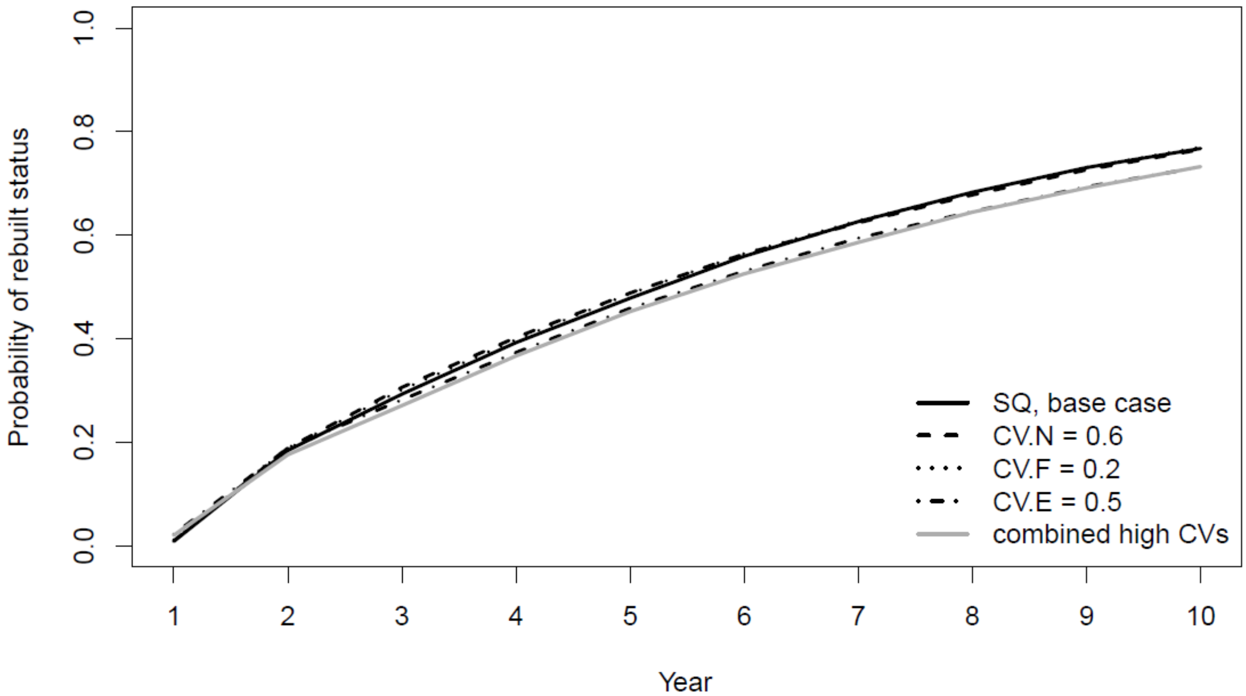

Figure 2. Probability of achieving rebuilt status in years 1 through 10 for the status quo control rule (Alternative I), given different parameter values for abundance forecast error (CV.N), exploitation rate implementation error (CV.F), and escapement estimation error (CV.E).

APPENDIX D. LIST OF AGENGIES AND PERSONS CONSULTED

{Section to be completed by NMFS after Council adopts a rebuilding plan}

The following public meetings were held as part of the salmon management process (Council-sponsored meetings in bold):

March 2018	**Rohnert Park, CA**
April 2018	**Portland, OR**
May 2018	Public Webinar
June 2018	Public Meeting in Olympia, WA
August 2018	Public Webinar
September 2018	Public Webinar
September2018	**Seattle, WA**
November 2018	**San Diego, CA**
March 2019	**Vancouver, WA**
April 2019	**Rohnert Park, CA**
June 2019	**San Diego, CA**
September2019	**Boise, ID**

The following organizations were consulted and/or participated in preparation of supporting documents:

Northwest Indian Fisheries Commission
Columbia River Intertribal Fish Commission
West Coast Indian Tribes

California Department of Fish and Wildlife
Oregon Department of Fish and Wildlife
Washington Department of Fish and Wildlife

National Marine Fisheries Service, West Coast Region, Sustainable Fisheries Division
National Marine Fisheries Service, Northwest Fisheries Science Center
National Marine Fisheries Service, Southwest Fisheries Science Center
U.S. Fish and Wildlife Service, Columbia River Fisheries Program Office
United States Coast Guard

APPENDIX E. REGULATORY IMPACT REVIEW

As applicable, rulemakings must comply with Executive Order (E.O.) 12866 and the Regulatory Flexibility Act (RFA). To satisfy the requirements of E.O. 12866, the National Marine Fisheries Service (NMFS) undertakes a regulatory impact review (RIR). To satisfy the requirements of the RFA, NMFS prepares an initial regulatory flexibility analysis (IRFA) and final regulatory flexibility analysis (FRFA), or a certification.

> The NMFS Economic Guidelines that describe the RFA and E.O. 12866 can be found at: http://www.nmfs.noaa.gov/op/pds/documents/01/111/01-111-05.pdf
>
> The RFA, 5 U.S.C. § 601 *et seq*., can be found at: http://www.nmfs.noaa.gov/sfa/laws_policies/economic_social/rfa_revised_through_2010_jobs_act.pdf
>
> Executive Order 12866 can be found at: http://www.nmfs.noaa.gov/sfa/laws_policies/economic_social/eo12866.pdf

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REGULATORY IMPACT REVIEW

The President of the United States signed E.O. 12866, "Regulatory Planning and Review," on September 30, 1993. This order established guidelines for promulgating new regulations and reviewing existing regulations. The E.O. covers a variety of regulatory policy considerations and establishes procedural requirements for analysis of the benefits and costs of regulatory actions. The E.O. stresses that in deciding whether and how to regulate, agencies should assess all of the costs and benefits of available regulatory alternatives. Based on this analysis, they should choose those approaches that maximize net benefits to the Nation, unless a statute requires another regulatory approach.

NMFS satisfies the requirements of E.O. 12866 through the preparation of an RIR. The RIR provides a review of the potential economic effects of a proposed regulatory action in order to gauge the net benefits to the Nation associated with the proposed action. The analysis also provides a review of the problem and policy objectives prompting the regulatory proposal and an evaluation of the available alternatives that could be used to solve the problem.

The RIR provides an assessment that can be used by the Office of Management and Budget to determine whether the proposed action could be considered a significant regulatory action under E.O. 12866. E.O. 12866 defines what qualifies as a "significant regulatory action" and requires agencies to provide analyses of the costs and benefits of such action and of potentially effective and reasonably feasible alternatives. An action may be considered significant if it is expected to: (1) Have an annual effect on the economy of $100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or state, local, or tribal governments or communities; (2) Create a serious inconsistency or otherwise interfere with an action taken or planned by another agency; (3)

Materially alter the budgetary impact of entitlement, grants, user fees, or loan programs or the rights and obligations of recipients thereof; or (4) Raise novel legal or policy issues arising out of legal mandates, the President's priorities, or the principles set forth in the EO.

Statement of the Problem
See Purpose and Need statement in this document (Section 2.2.2).

Description of the fishery and other affected entities
See Ocean and Puget Sound fishery descriptions in this document (Section 3.3.1, Section 3.3.2, and Appendix B).

Description of the management goals and objectives
See conservation objectives and management strategy in this document (Section 2.4.1 and Section 2.4.2).

Description of the Alternatives
See management strategy alternatives, analysis, and additional information in this document (Section 4.2, Section 4.6, and Appendix C).

An Economic Analysis of the Expected Effects of Each Selected Alternative Relative to the No Action Alternative
See socioeconomic impact of management strategy alternatives considered in this document (Section 5.0).

RIR-Determination of Significant Impact
As noted above, under E.O. 12866, a regulation is a "significant regulatory action" if it is likely to: (1) have an annual effect on the economy of $100 million or more or adversely affect in a material way the economy, a sector of the economy, productivity, competition, jobs, the environment, public health or safety, or State, local, or tribal governments or communities; (2) create a serious inconsistency or otherwise interfere with an action taken or planned by another agency; (3) materially alter the budgetary impact of entitlements, grants, user fees, or loan programs or the rights and obligations of recipients thereof; or (4) raise novel legal or policy issues arising out of legal mandates, the President's priorities, or the principles set forth in this Executive Order. Pursuant to the procedures established to implement section 6 of E.O. 12866, the Office of Management and Budget has determined that this action is not significant.

APPENDIX F. REGULATORY FLEXIBILITY ANALYSIS

REGULATORY FLEXIBILITY ANALYSIS

For any rule subject to notice and comment rulemaking, the RFA requires Federal agencies to prepare, and make available for public comment, both an initial and final regulatory flexibility analysis, unless the agency can certify that the proposed and/or final rule would not have a "significant economic impact on a substantial number of small entities". This determination can be made at either the proposed or final rule stage. If the agency can certify a rule, it need not prepare an IRFA, a FRFA, a "Small Entity Compliance Guide," or undertake a subsequent periodic review of the rule under Section 610 of the RFA. The NMFS Regional Administrator/Office Director, using analyses and rationale provided by the Council or NMFS, prepares a memorandum from the Chief Counsel for Regulation (CC/Regs) of the DOC to the Chief Counsel for Advocacy certifying and setting forth the factual basis for the certification.

The CC/Regs will sign and transmit the certification to SBA at the time the notice of proposed rulemaking or final rulemaking is published in the FR, along with a statement providing the factual basis for such certification.

Request for comment on proposed rules

In addition to comments on the analysis below, the agency requests comments on the decision to certify this rule.

Description of the reasons why action by the agency is being considered

The reasons why agency action is being considered are explained in Section 2.2 of the respective rebuilding plans (Pacific Fishery Management Council. 2019. Salmon Rebuilding Plan for Queets River Natural Coho; Salmon Rebuilding Plan for Snohomish River Natural Coho; Salmon Rebuilding Plan for Strait of Juan de Fuca Natural Coho).

Statement of the objectives of, and legal basis for, the proposed rule

The reasons why agency action is being considered are explained in Section 2 of the rebuilding plans cited above.

Reporting and recordkeeping requirements

There are no applicable reporting and recordkeeping requirements associated with this rulemaking. A description and, where feasible, estimate of the number of small entities to which the proposed rule will apply

Part 121 of Title 13, Code of Federal Regulations (CFR), sets forth, by North American Industry Classification System (NAICS) categories, the maximum number of employees or average annual gross receipts a business may have to be considered a small entity for RFAA purposes. See 13 C.F.R. § 121.201. Under this provision, the U.S. Small Business Administration established criteria for businesses in the fishery sector to qualify as small entities. Standards are expressed either in number of employees, or annual receipts in millions of dollars. The number of employees or annual receipts indicates the maximum allowed for a concern and its affiliates to be considered small (13 C.F.R. § 121.201).

The SBA size standard for Subsector 487, "Scenic and Sightseeing Transportation", which includes charter fishing, is $7.5 million in gross receipts (13 CFR § 121.201).

Provision is made under SBA's regulations for an agency to develop its own industry-specific size standards after consultation with Advocacy and an opportunity for public comment (see 13 CFR 121.903(c)). NMFS has established a small business size standard for businesses, including their affiliates, whose primary industry is commercial fishing (80 FR 81194, December 29, 2015). This standard is only for use by NMFS and only for the purpose of conducting an analysis of economic effects in fulfillment of the agency's obligations under the RFA.

NMFS' small business size standard for businesses, including their affiliates, whose primary industry is commercial fishing is $11 million in annual gross receipts. This standard applies to all businesses classified under North American Industry Classification System (NAICS) code 11411 for commercial fishing, including all businesses classified as commercial finfish fishing (NAICS 114111), commercial shellfish fishing (NAICS 114112), and other commercial marine fishing (NAICS 114119) businesses. (50 C.F.R. § 200.2; 13 C.F.R. § 121.201).

According to the PacFIN database (discussed in greater detail in the assumptions discussion below); 357 distinct vessels caught salmon in the North of Cape Falcon or Puget Sound areas in 2018. All of these vessels had revenue less than the threshold for small entities defined above, and because no data on affiliation are available, each of these is assumed to be a small entity. From the recreational effort database (RecFIN), in 2018 during the peak months of July and August there were a maximum of 189 boat trips a day in the ocean recreational fishery. Assuming each boat trip is one vessel, it is assumed that 189 ocean recreational businesses will be directly regulated under this rule. There are no data available about the size of these entities so all are considered small. RecFIN does not provide effort estimates for recreational fisheries in Puget Sound that would also be impacted by this rule, so the true number of recreational entities is assumed to be higher than the 189 vessels in the ocean fisheries.

Description and estimate of economic effects on entities, by entity size and industry.
A detailed description and estimate of the economic effects of the proposed rule is available in Section 5.3 of the rebuilding plans cited above. To summarize, there are no expected economic effects of the Juan de Fuca and Queets coho rebuilding plans as the Council selected the No Action alternative. The impacts in the Snohomish rebuilding plan are expected to be relatively minor (~$140,000 per year) for a total of $430,000 over three years (with a 23 percent chance of rebuilding before three years).

An explanation of the criteria used to evaluate whether the rule would impose "significant" economic effects.
Because all directly regulated entities are small, these regulations are not expected to place small entities at a significant disadvantage to large entities. Without detailed data available to inform a distributional analysis, it is assumed that the 357 commercial vessels and 189 (plus unknown number of Puget Sound charter vessel) would all be impacted equally. The 2004-2016 average community income contribution of commercial and recreational salmon fisheries is $13.3 million. As discussed above, the estimated impacts from the Alternative II Snohomish rebuilding plan and

No Action Queets and Juan de Fuca rebuilding plans is $0.14 million, or about 1 percent of the total coastwide community income. Thus while there are short-run negative impacts associated with this rule, these are not expected to be "significant" relative to the size of the fishery. There may be localized impacts that are greater or lower than the regional average.

An explanation of the criteria used to evaluate whether the rule would impose effects on "a substantial number" of small entities.

This rule would impact the salmon fishery north of Cape Falcon, which as described above included 171 distinct commercial entities and at least 189 recreational entities, which is a substantial number of small entities.

A description of, and an explanation of the basis for, assumptions used.

Data used to inform this analysis come primarily from PacFIN, which includes data provided by the states of Oregon, California, and Washington on commercial fishing trips and landings; in addition to the West Coast Region permit database and the recreational fisheries database (RecFIN). The number of entities predicted to be impacted is generally based on the level of participation in the previous year (2018). However, it is possible that environmental or management conditions change in other fisheries that would impact the level of participation in the salmon fishery beyond what is predicted here. For a detailed description of assumptions made in the economic analysis, see Sections 5.1 and 5.5 cited above.

Relevant Federal rules that may duplicate, overlap or conflict with the proposed rule:

There are no relevant Federal rules that may duplicate, overlap, or conflict with this action.

Certification statement by the head of the agency

The agency finds per 5 U.S.C. § 605 (the RFA) that "the proposed rule, if promulgated, will not have a significant economic impact on a substantial number of small entities."

Reviewed by West Coast Regional Economist Abigail Harley

APPENDIX G. CONSISTENCY WITH OTHER APPLICABLE LAWS ANALYSIS

Magnuson Stevens Fishery Conservation and Management Act (MSA)

The MSA provides parameters and guidance for Federal fisheries management. Overarching principles for fisheries management are found in the MSA's National Standards, which articulate a broad set of policies governing fisheries management. In crafting fisheries management regimes, the Councils and NMFS must balance their recommendations to meet these different national standards.

National Standard 1 requires that, upon notification that a stock or stock complex is overfished or approaching an overfished condition, a Council must prepare and implement an FMP, FMP amendment, or proposed regulations (i.e., rebuilding plan) within two years of notification, consistent with the requirements of section 304(e)(3) of the MSA. The Council's rebuilding plan must specify a time period for rebuilding the stock or stock complex based on factors specified in MSA 304(e)(4). This target time for rebuilding (T_{target}) shall be as short as possible, taking into account: the status and biology of any overfished stock, the needs of fishing communities, recommendations by international organizations in which the U.S. participates, and interaction of the stock within the marine ecosystem. In addition, the time period shall not exceed 10 years, except where biology of the stock, other environmental conditions, or management measures under an international agreement to which the U.S. participates, dictate otherwise. The rebuilding plan will specify the minimum time for rebuilding the overfished stock (T_{min}), the maximum time for rebuilding (T_{max}).

The alternatives in section 4.2 of this document were developed to be consistent with the requirements of the MSA. Rebuilding times (T_{target}) under the two alternatives have a range of 5 to 6 years. The preferred alternative (Alternative I – Status quo) has a T_{target} of 6 years and would rebuild the stock nearly as quickly as Alternative II while providing consideration of the needs of fishing communities. Alternative II would rebuild the stock one year more quickly than alternative I, but would potentially impact fishing communities by constraining fisheries in some years to meet an exploitation rate cap. Because the Council does not have jurisdiction over fisheries shoreward of the EEZ, a No-fishing Alternative was not considered; however, rebuilding time under a no-fishing scenario was modelled and provided an estimate for T_{min} of 4 years. When T_{min} is 10 years or less, NS1 states that T_{max} is 10 years. Therefore, the alternatives are consistent with NS1. Year 1 for the JDF coho analysis is 2018:

- T_{target}
    - Alternative I – 6 years (2023)
    - Alternative II – 5 years (2022)
- T_{min} – 4 years (2021)
- T_{max} – 10 years (2027)

National Standard 2 requires the use of the best available scientific information. The Council's Scientific and Statistical Committee (SSC) reviewed and recommended the methods used to develop alternatives for SRFC rebuilding plans and the analyses used to estimate T_{target} and T_{min}. The alternatives were crafted based on up to date scientific information regarding abundance and the methods approved by the SSC.

National Standard 3 requires individual stocks of fish to be managed as a unit throughout their ranges and interrelated stocks of fish to be managed as a unit. The conservation objectives and ACLs are established for individual stocks in the Salmon FMP and are based on either escapement or on total fishery exploitation rate, both of which account for impacts to stocks from fisheries throughout their range. All salmon stocks are managed as a unit in Council-area fisheries to ensure all conservation objectives are met. The alternatives were developed to be consistent with, or more conservative than, the conservation objectives and ACLs in the FMP in order to rebuild the overfished stock.

National Standard 4 requires that "Conservation and management measures shall not discriminate between residents of different States." And that "allocation shall be: (A) fair and equitable…; (B) reasonably calculated to promote conservation; and (C) carried out in such manner that no…entity acquires an excessive share." The alternatives do not affect the allocation guidelines in the FMP, which were in turn developed to meet National Standard 4.

National Standard 5 requires efficiency, where practicable, in the utilization of fishery resources. All alternatives in this EA are expected to have no significant effects on the efficiency in the utilization of fishery resources.

National Standard 6 requires conservation objectives and management measures to take into account and allow for variations among, and contingencies in, fisheries, fishery resources, and catches. The FMP allows for inseason management of Council-area salmon fisheries to meet conservation objectives and preseason management objectives. None of the alternatives would affect that.

National Standard 7 requires that conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication. All alternatives in this EA meet this standard.

National Standard 8 requires that conservation and management measures shall, consistent with the conservation requirements of the MSA, take into account the importance of fishery resources to fishing communities in order to "(A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities." The alternatives represent a range of management measures with various economic impacts. The Final Preferred Alternative (Alternative I) was developed to provide the optimum balance between the short-term needs of the communities and the long-term needs of the communities, needs which rely on long-term health of the salmon stocks.

National Standard 9 requires the reduction, to the extent practicable, of bycatch or bycatch mortality. All alternatives in this EA are expected to have no significant effects due to bycatch mortality on non-target species.

National Standard 10 requires, to the extent practicable, conservation and management measures to promote the safety of human life at sea. The Alternatives in this EA are not expected to impact risks to salmon fishermen.

Coastal Zone Management Act (CZMA)

Section 307(c)(1) of the CZMA of 1972 requires all Federal activities that directly affect the coastal zone be consistent with approved state coastal zone management programs to the maximum extent practicable. The proposed action was developed to rebuild the overfished Snohomish natural coho stock and was determined by NMFS to be consistent to the maximum extent practicable with the approved coastal zone management programs of the affected states (i.e., Washington and Oregon). This determination was sent to the responsible state agencies in Washington, on November 22, 2019, and Oregon, on November 26, 2019, for review under section 307(c)(1) of the CZMA. The State of Washington has concurred with NMFS' finding. The State of Oregon has not responded; therefore, concurrence is assumed.

Endangered Species Act (ESA)

Ocean salmon fisheries conducted under the FMP do affect ESA-listed salmon species. The alternatives analyzed in this EA do not superseded conservation measures required to protect ESA-listed species. Implementation of the proposed action will be consistent biological opinions issued by NMFS.

Of the ESA-listed marine mammals described below (see MMPA section), Council-managed salmon fisheries only impact listed Southern Resident Killer Whales. NMFS consulted on the effects of the ocean salmon fisheries on the ESA-listed Southern Resident killer whale (SRKW) distinct population segment in 2009. As discussed below, NMFS has reinitiated consultation to consider new information. Consultations on ocean salmon fisheries effects on ESA-listed Puget Sound yelloweye rockfish, bocaccio, Pacific eulachon, and North American green sturgeon concluded no effect from Council-managed ocean salmon fisheries on these species.

The following biological opinions and Section 4(d) determinations have been prepared for West Coast stocks by NMFS.

Table G-1. NMFS ESA Biological Opinions regarding Evolutionarily Significant Units (ESUs) and Distinct Population Segments (DPSs) affected by PFMC Fisheries.

Date	Duration	Species Considered
Salmonid Species		
March 8, 1996	until reinitiated	Snake River spring/summer and fall Chinook Snake River sockeye
April 28, 1999	until reinitiated	S. Oregon/N. California Coastal coho Central California Coast coho Oregon Coast natural coho
April 28, 2000	until reinitiated	Central Valley Spring-run Chinook California Coastal Chinook
April 27, 2001	until withdrawn	Hood Canal summer-run chum
April 30, 2001	until reinitiated	Upper Willamette River Chinook Columbia River chum Ozette Lake sockeye Upper Columbia River spring-run Chinook Ten listed steelhead DPSs
June 13, 2005	until reinitiated	California Coastal Chinook
April 4, 2015	until reinitiated	Lower Columbia River coho
March 3, 2018	until reinitiated	Sacramento River winter-run Chinook
April 29, 2004	until reinitiated	Puget Sound Chinook
April 26, 2012	until reinitiated	Lower Columbia River Chinook
Non-Salmonid Species		
May 5, 2009	Reinitiated in 2019	Southern Resident Killer Whales

Marine Mammal Protection Act (MMPA)

The MMPA of 1972 is the principle Federal legislation that guides marine mammal species protection and conservation policy in the United States. Under the MMPA, NMFS is responsible for the management and conservation of 153 stocks of whales, dolphins, porpoise, as well as seals, sea lions, and fur seals; while the US Fish and Wildlife Service is responsible for walrus, sea otters, and the West Indian manatee.

Off the west coast, the SRKW DPS is listed as endangered under the ESA; Guadalupe fur seal, and Southern sea otter California stock are listed as threatened under the ESA. The sperm whale (WA, OR, CA stock), humpback whale (WA, OR, CA, Mexico stock), blue whale eastern north Pacific stock, and Fin whale (WA, OR, CA stock) are listed as endangered under the ESA. Any marine mammal species listed as endangered or threatened under the ESA is automatically considered depleted under the MMPA.

The commercial salmon troll fisheries off the west coast are classified as Category III fisheries under the MMPA, indicating a remote or no likelihood of causing incidental mortality or serious injury to marine mammals (84 FR 22051, May 16, 2019). Recreational salmon fisheries are assumed to have similar impacts as they use similar gear and techniques.

Migratory Bird Treaty Act (MBTA)

The MBTA of 1918 was designed to end the commercial trade of migratory birds and their feathers that, by the early years of the 20th century, had diminished populations of many native bird species. The act states it is unlawful to take, kill, or possess migratory birds and their parts (including eggs, nests, and feathers) and is a shared agreement between the United States, Canada, Japan, Mexico, and Russia to protect a common migratory bird resource. The MBTA prohibits the directed take of seabirds, but the incidental take of seabirds does occur. None of the alternatives directly affect any seabirds protected by the MBTA.

Paperwork Reduction Act (PRA)

The purposes of the PRA are to minimize the burden of information collection by the Federal Government on the public; maximize the utility of any information thus collected; improve the quality of information used in Federal decision making, minimize the cost of collection, use and dissemination of such information; and improve accountability. The PRA requires Federal agencies to obtain clearance from the Office of Management and Budget before collecting information. This clearance requirement is triggered if certain conditions are met. "Collection of information" is defined broadly. In summary it means obtaining information from third parties or the public by or for an agency through a standardized method imposed on 10 or more persons. Collection of information need not be mandatory to meet the trigger definition. Even information collected by a third party, if at the behest of a Federal agency, may trigger the clearance requirement. Within NMFS, the Office of the Chief Information Officer is responsible for PRA compliance. Obtaining clearance can take up to 9 months and is one aspect of NMFS review and approval of Council decisions.

The proposed action does not include a collection-of-information requirement and, therefore, authorization under the PRA is not required.

Executive Order 12898 Environmental Justice

Executive Order 12898 obligates Federal agencies to identify and address "disproportionately high adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations in the United States" as part of any overall environmental analysis associated with an action. NOAA guidance, NAO 216-6, at 7.02, states that "consideration of Executive Order 12898 should be specifically included in the NEPA documentation for decision making purposes." Agencies should also encourage public participation "especially by affected communities" as part of a broader strategy to address environmental justice issues.

The environmental justice analysis must first identify minority and low-income groups that live in the project area and may be affected by the action. Typically, census data are used to document the occurrence and distribution of these groups. Agencies should be cognizant of distinct cultural, social, economic or occupational factor that could amplify the adverse effects of the proposed action. (For example, if a particular kind of fish is an important dietary component, fishery management actions affecting the availability or price of that fish could have a disproportionate effect.) In the case of Indian tribes, pertinent treaty or other special rights should be considered. Once communities have been identified and characterized, and potential adverse impacts of the alternatives are identified, the analysis must determine whether these impacts are disproportionate. Because of the context in which environmental justice developed, health effects are usually considered and three factors may be used in an evaluation: whether the effects are deemed significant, as the term is employed by NEPA; whether the rate or risk of exposure to the effect appreciably exceeds the rate for the general population or some other comparison group; and whether the group in question may be affected by cumulative or multiple sources of exposure. If disproportionately high adverse effects are identified, mitigation measures should be proposed. Community input into appropriate mitigation is encouraged.

This EA includes an environmental justice analysis (see section 6.6, above) that determined that the Preferred Alternative (Alternative I) would not have a disproportionate impact on cultural resources compared with Alternative II. The determination also found that economic impacts among the alternatives would be short-term and not expected to disproportionally affect minority and low-income communities. West Coast Indian tribes are part of the Council's decision-making process on salmon management issues, and tribes with treaty rights to salmon, groundfish, or halibut have a seat on the Council. Additionally, the Makah Tribe contributed substantially to this document.

Executive Order 13132 Federalism

Executive Order 13132 enumerates eight "fundamental federalism principles." The first of these principles states "Federalism is rooted in the belief that issues that are not national in scope or significance are most appropriately addressed by the level of government closest to the people." In this spirit, the Executive Order directs agencies to consider the implications of policies that may limit the scope of or preempt states' legal authority. Preemptive action having such "federalism implications" is subject to a consultation process with the states; such actions should not create unfunded mandates for the states; and any final rule published must be accompanied by a "federalism summary impact statement."

The Council process offers many opportunities for states and Indian tribes (through their agencies, Council appointees, consultations, and meetings) to participate in the formulation of management frameworks and management measures implementing the framework. This process encourages states and tribes to institute complementary measures to manage fisheries under their jurisdiction that may affect federally managed stocks.

The proposed action would not have federalism implications subject to Executive Order 13132.

Executive Order 13175 Consultation and Coordination with Indian Tribal Governments

Executive Order 13175 is intended to ensure regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes.

The Secretary recognizes the sovereign status and co-manager role of Indian tribes over shared Federal and tribal fishery resources. At Section 302(b)(5), the MSA reserves a seat on the Council for a representative of an Indian tribe with Federally-recognized fishing rights from California, Oregon, Washington, or Idaho.

Several tribes with Federally-recognized fishing rights may be impacted by the proposed action. The proposed action and the other alternative have been developed through the Council process. Through the tribal representative on the Council and tribal comments submitted to NMFS and the Council, the tribes have had a role in the developing the proposed action and analyzing the effects of the alternatives; therefore, the proposed action is consistent with EO 13175.

Executive Order 13771 Reducing Regulation and Controlling Regulatory Costs

Executive Order 13771 requires federal agencies to remove two regulations for every new regulation for rulemakings that are determined to be "significant" by the Office of Management and Budget (OMB). As the proposed action has not been determined to be significant by OMB, there is no applicability of this executive order.

APPENDIX H. FINDING OF NO SIGNIFICANT IMPACT

Background

Proposed Action:

The proposed action is for the Pacific Fishery Management Council (Council) to adopt and the National Oceanic and Atmospheric Administration's (NOAA's) National Marine Fisheries Service (NMFS) to approve a rebuilding plan for the Strait of Juan de Fuca natural coho salmon stock (JDF coho), which has been determined by NMFS to be overfished under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). Details can be found in the Environmental Assessment (EA).

Alternatives Evaluated in the Environmental Assessment:

Alternative I. Status quo control rule. This is considered the 'no-action' alternative and is the preferred alternative.

Alternative II. Limit Exploitation Rate. Southern U.S. fisheries (i.e., ocean and inland fisheries south of the U.S./Canada border) would be limited to an annual exploitation rate on JDF coho of 10 percent, irrespective of abundance forecast.

Selected Alternative:

Alternative I. Status quo control rule.

Related Consultations:

There are no consultations specific to the proposed action; however, there are several Endangered Species Act (ESA) section 7 consultations on the ocean salmon fisheries impacts on ESA-listed evolutionarily significant units (ESUs) of salmon. Table 6.4.1.b below, reproduced from the EA, lists the current applicable ESA section 7 biological opinions relative to ESA-listed salmon ESUs.

Table 6.4.1.b. NMFS biological opinions regarding ESA-listed salmon ESUs likely to be affected by Council-area ocean salmon fisheries in the analysis area.

Date	Duration	Citation	Species Considered
8-Mar-96	Until reinitiated	NMFS 1996	Snake River spring/summer and fall Chinook (and sockeye)
28-Apr-99	Until reinitiated	NMFS 1999	Oregon Coast coho (S. Oregon/N. California Coast coho, and Central California Coast coho)
30-Apr-01	Until reinitiated	NMFS 2001	Upper Willamette Chinook, Upper Columbia River spring-run Chinook (Lake Ozette sockeye, Columbia River chum, and 10 steelhead ESUs)
30-Apr-04	Until reinitiated	NMFS 2004	Puget Sound Chinook
26-Apr-12	Until reinitiated	NMFS 2012	Lower Columbia River Chinook
9-Apr-15	Until reinitiated	NMFS 2015	Lower Columbia River coho

In addition to ESA-listed salmon, NMFS has consulted on the effects of the ocean salmon fisheries on ESA-listed Southern Resident killer whales (SRKW). As stated in section 6.3.1 of the EA, NMFS completed a consultation on the effects of implementing the Council's 2020 ocean salmon management measures on SRKW and intends to complete an opinion analyzing operation of the fishery under the Pacific Coast Salmon Fishery Management Plan (FMP), including this rebuilding plan, prior to the 2021 ocean salmon fishing season.

Significance Review

The Council on Environmental Quality (CEQ) Regulations state that the determination of significance using an analysis of effects requires examination of both context and intensity, and lists ten criteria for intensity (40 C.F.R. § 1508.27 (1978)). In addition, the Companion Manual for National Oceanic and Atmospheric Administration Administrative Order 216-6A provides sixteen criteria, the same ten as the CEQ Regulations and six additional, for determining whether the impacts of a proposed action are significant. Each criterion is discussed below with respect to the proposed action and considered individually as well as in combination with the others.

1. ***Can the proposed action reasonably be expected to cause both beneficial and adverse impacts that overall may result in a significant effect, even if the effect will be beneficial?***

   The proposed action is expected to have the beneficial impact of rebuilding the overfished JDF coho salmon stock. However, the selected alternative is the No-action Alternative; therefore, the stock is expected to rebuild irrespective of the proposed action, and there is no significant effect expected.

2. ***Can the proposed action reasonably be expected to significantly affect public health or safety?***

   No, there are no effects on public health or safety from the proposed action. The proposed action implements a harvest control rule to be used in setting annual ocean salmon fishery management measures while the JDF coho salmon stock is rebuilding.

3. ***Can the proposed action reasonably be expected to result in significant impacts to unique characteristics of the geographic area, such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas?***

   No, the proposed action has no physical action. The proposed action implements a harvest control rule to be used in setting annual fishery management measures while the JDF coho salmon stock is rebuilding.

4. ***Are the proposed action's effects on the quality of the human environment likely to be highly controversial?***

   No, the proposed action is not likely to be highly controversial. The proposed action was developed through a series of public meetings and with the involvement of stakeholders and co-managers. NMFS received no comments on the draft EA.

5. ***Are the proposed action's effects on the human environment likely to be highly uncertain or involve unique or unknown risks?***

No, the proposed action's effects are not likely to be highly uncertain as they are based on well-documented methodologies.

6. ***Can the proposed action reasonably be expected to establish a precedent for future actions with significant effects or represent a decision in principle about a future consideration?***

   No, rebuilding plans are developed on a case-by-case basis with the unique circumstances of each instance taken into consideration.

7. ***Is the proposed action related to other actions that when considered together will have individually insignificant but cumulatively significant impacts?***

   No, the proposed action will inform the setting of annual management measures for ocean salmon fisheries. These annual management measures are analyzed in a National Environmental Policy Act (NEPA) document. The annual management measures are developed to meet the cumulative conservation objectives and other requirements for all MSA-managed salmon stocks on the West Coast.

8. ***Can the proposed action reasonably be expected to adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources?***

   No, the proposed action has no physical action. The proposed action establishes a harvest control rule to be used in setting annual fishery management measures while the JDF coho salmon stock is rebuilding.

9. ***Can the proposed action reasonably be expected to have a significant impact on endangered or threatened species, or their critical habitat as defined under the Endangered Species Act of 1973?***

   No, annual management measures for ocean salmon fisheries are developed to be consistent with biological opinions on the impact of the ocean salmon fisheries on ESA-listed species.

10. ***Can the proposed action reasonably be expected to threaten a violation of Federal, state, or local law or requirements imposed for environmental protection?***

    No, the proposed action was prepared with consideration of MSA, NEPA, and other applicable laws.

11. ***Can the proposed action reasonably be expected to significantly adversely affect stocks of marine mammals as defined in the Marine Mammal Protection Act (MMPA)?***

    No, the proposed action will not have any significant impact on marine mammals. The MMPA is one of the applicable laws that were considered in the development of the proposed action.

12. Can the proposed action reasonably be expected to significantly adversely affect managed fish species?

No, as described in chapter 6 of the EA, non-salmonid managed fish species are managed under their other West Coast fishery management plans and are uncommonly encountered in the salmon fishery; therefore, the proposed action will not have any effect on those managed fish species. The proposed action will not adversely affect any managed salmon species, and is specifically designed to rebuild a managed stock of salmon.

13. Can the proposed action reasonably be expected to significantly adversely affect essential fish habitat as defined under the Magnuson-Stevens Fishery Conservation and Management Act?

No, there are no adverse effects to essential fish habitat from the proposed action. The proposed action implements a harvest control rule to be used in setting annual ocean salmon fishery management measures while the JDF coho salmon stock is rebuilding.

14. Can the proposed action reasonably be expected to significantly adversely affect vulnerable marine or coastal ecosystems, including but not limited to, deep coral ecosystems?

No, the proposed action will not adversely affect vulnerable marine or coastal ecosystems. The proposed action implements a harvest control rule to be used in setting annual ocean salmon fishery management measures in a sustainable manner while the JDF coho salmon stock is rebuilding.

15. Can the proposed action reasonably be expected to significantly adversely affect biodiversity or ecosystem functioning (e.g., benthic productivity, predator-prey relationships, etc.)?

No, the proposed action will not adversely affect biodiversity or ecosystem functioning. The proposed action implements a harvest control rule to be used in setting annual ocean salmon fishery management measures in a sustainable manner while the JDF coho salmon stock is rebuilding.

16. Can the proposed action reasonably be expected to result in the introduction or spread of a nonindigenous species?

No, the proposed action does not affect the introduction or spread of nonindigenous species. The West Coast states have regulations in place for vessel inspections to address this issue.

Determination

In view of the information presented in this document and the analysis contained in the supporting Environmental Assessment prepared for the JDF coho salmon Rebuilding Plan, it is hereby determined that the JDF coho salmon Rebuilding Plan will not significantly impact the quality of the human environment as described above and in the supporting Environmental Assessment. In addition, all beneficial and adverse impacts of the proposed action have been addressed to reach the conclusion of no significant impacts. Accordingly, preparation of an environmental impact statement for this action is not necessary.

December 14, 2020

Date

Regional Administrator
West Coast Region
National Marine Fisheries Service