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VIA FACSIMILE, E-MAIL, AND FIRST CLASS MAIL

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RE: Oregon's Draft Coho Project Report

Dear Chief and the Governor's Natural Resources Office:

We are writing in response to NMFS's and the State of Oregon's solicitation of public comments on the State's draft Oregon Coastal Coho assessment. Although we believe the state and federal deadlines for the comment period are inadequate to provide for meaningful public review of the draft assessment, we would like to raise a number of questions regarding the assessment. These questions are not intended to be exhaustive:

- Is the assessment sufficiently risk averse, and does it use a precautionary approach, when conclusions about the factors for decline, and the level of risk of these factors to Oregon coast coho viability, repeatedly rely upon the viability finding?
- Where is the biological evaluation to support the conclusions that spending money on Oregon programs has resulted in a viable Oregon coast coho stock?
- Where is the evidence that money spent on Oregon plan programs has been targeted to the highest priority restoration needs (both the high priority areas and the types of treatments)?

- Where are the hard and fast feedback mechanisms and triggers to ensure that Oregon plan promises and future actions will protect Oregon coast coho if the stock is not listed?
- Why does the assessment assess viability with a model that appears unable to produce extinction behavior under any conditions?
- Where are the empirical data that demonstrate coho population behavior at low abundance?
- Do you have genetic, demographic, or other evidence that at low abundance, populations are comprised of anything other than the background rate of strays that would be observed where there is no production?
- Why does the model not examine or explain the pervasive local extinctions throughout the range of the Oregon coast coho? (Even a cursory look at ODFW historical spawner count data reveals numerous and persistent local population extinctions.)
- If the world works as the model is configured, then should not those streams where local populations were extirpated be currently populated?
- If local extinctions can occur at the scale of spawner surveys, and these local populations have not recovered, how can you guarantee that extinction will not occur at the HUC level or any higher level?
- How does the assessment address the varied responses of populations of individual tributaries to in-basin factors?
- Where is the analysis to substantiate the assumption that there are not large and adverse changes triggered by storm events?
- Why does the assessment assume that future, timely detection of changes in the overall Oregon coast coho population will occur when current scientific literature indicates that it takes 15 years to detect any specific trends in spawner counts for migratory species?
- How do we know that waiting for future detection of changes in Oregon coast coho viability does not put the species in an irretrievably compromised position that prevents recovery?
- What is the standard that will be used when NMFS determines whether or not to list the Oregon coast coho?
- Is the PECE policy applicable to the current decision whether to retain ESA protection for the Oregon coast coho?

Thank you for considering our questions.

Sincerely,

Bronwen Wright
Policy Analyst
On behalf of Pacific Rivers Council