



February 18, 2011

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

RE: Comments Regarding the National Marine Fisheries Services  
 Proposed Evaluation of the Comprehensive Management Plan for Puget  
 Sound Chinook: Harvest Management Component published in the Dec.  
 29, 2010 Federal Register (FR Doc. 2010-32845)

Dear Will,

The WRIA 8 Salmon Recovery Council commented on the draft Puget Sound Chinook Harvest Management Plan when it was submitted for review by the Puget Sound Indian Tribes and the State of Washington Department of Fish and Wildlife to the National Marine Fisheries Service (NMFS) in November 2009. We expressed concern in our January 22, 2010 letter to Barry Thom, the Acting Regional Administrator of the NMFS, that the draft Harvest Plan did not provide adequate protection for Lake Washington Chinook populations. Please see attached copy of the January 22<sup>nd</sup> letter and its additional technical comments.

Reviewing the current Harvest Plan, we appreciate that language in the Lake Washington profile section of the Harvest Plan stating that the Sammamish River population is “not essential to the recovery of the Puget Sound ESU” and that “additional constraints on harvest are not warranted” has been removed. We also appreciate the clarifying language that further elaborates on the Co-Managers’ understanding of the relationship between Cedar River and Sammamish River population escapement levels. However, we feel that most of the concerns expressed in our previous letter were neither addressed nor responded to, and remain valid.

Furthermore, we are concerned that NMFS used the draft prioritization of Puget Sound Chinook Salmon Populations in the Population Recovery Approach (PRA) in its 4d evaluation of the Harvest Plan. We have serious concerns with the process used to develop the PRA, the lack of clarity in the purpose of the document, its technical reasoning, and age of data used in its assessment. We think that there is serious potential for unintended,

- Beaux Arts Village
- Bellevue
- Bothell
- Clyde Hill
- Edmonds
- Hunts Point
- Issaquah
- Kenmore
- Kent
- King County
- Kirkland
- Lake Forest Park
- Maple Valley
- Medina
- Mercer Island
- Mill Creek
- Mountlake Terrace
- Mukilteo
- Newcastle
- Redmond
- Renton
- Sammamish
- Seattle
- Shoreline
- Snohomish County
- Woodinville
- Yarrow Point
  
- The Boeing Company
- Cedar River Council
- Greater Maple Valley Area Council
- Greater Seattle Chamber of Commerce
- Mid-Sound Fisheries Enhancement Group
- Northwest Marine Trade Association
- Save Lake Sammamish
- Sustainable Fisheries Foundation
- Trout Unlimited
  
- US Army Corps of Engineers
- Washington Departments:
  - Ecology
  - Fish and Wildlife
  - Natural Resources
- Washington Association of Sewer and Water Districts
- King Conservation District

harmful consequences to Puget Sound and local salmon recovery efforts from the PRA if it is adopted in its current form. Our concerns with the PRA are documented in a separate comment letter. We further feel that it is inappropriate for the NMFS to use the draft PRA as guidance for reviewing the 4d evaluation of the Harvest Plan, when the PRA has not been through a public review.

NMFS's conclusion that the Harvest Plan "will result in a range of risks to individual populations" but that the range of risks is "consistent with survival and recovery objectives for the broader Puget Sound Chinook species" is not very reassuring to the WRIA 8 Salmon Recovery Council. We feel that WRIA 8's Chinook populations, especially the Cedar River, may be among those populations at greater risk. Given that other assessments by State and Tribal managers classify the Cedar population as a high priority population, an increased level of risk founded on flawed technical information is highly troubling, and we are concerned that this greater risk may subvert the hard work our member jurisdictions and agencies do to preserve and restore salmon runs in our watershed.

Thank you for the opportunity to comment on NMFS' proposed 4d evaluation of the Harvest Plan. We look forward to continuing to work with you on salmon recovery in Puget Sound in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Davidson", written in a cursive style.

Dr. Don Davidson, DDS  
Mayor, City of Bellevue  
Chair, WRIA 8 Salmon Recovery Council

CC: Susan Bishop, NMFS  
Joe Ryan, Puget Sound Partnership  
Laura Blackmore

