

Mulvihill-Kuntz, Jason

From: Mulvihill-Kuntz, Jason
Sent: Friday, June 15, 2018 4:10 PM
To: 'ps2018rmp.wcr@noaa.gov'
Subject: DEIS scoping comments for draft Puget Sound Chinook RMP

Barry A. Thom
Regional Administrator
West Coast Region
National Marine Fisheries Service

Dear Mr. Thom:

Thank you for the opportunity to offer scoping comments on NOAA Fisheries' Notice of Intent to draft an Environmental Impact Statement analyzing the effects of the Puget Sound Chinook Harvest Resource Management Plan (RMP). As you know, partners in the Lake Washington/Cedar/Sammamish Watershed (a.k.a., Water Resource Inventory Area [WRIA] 8) have been working together since 2000 to implement the watershed's Chinook Salmon Conservation Plan (Plan) to recover Chinook salmon, which is a chapter of the federally-approved Puget Sound Salmon Recovery Plan (2005). This coordinated effort focuses primarily on habitat protection and restoration.

While it is difficult to respond to a request for scoping comments when the draft RMP is still undergoing revision, I respectfully submit the following scoping/clarifying questions, based on the current available version, to help inform WRIA 8 salmon recovery partners:

General RMP:

- How has the draft RMP integrated requirements or considerations regarding Chinook salmon and ESA-listed Southern Resident Killer Whales?
- How has the draft RMP incorporated an All-H (Harvest, Habitat and Hatchery) Integration framework as advocated by NOAA and WDFW?

Lake Washington Management Unit:

- How does the proposed new upper management threshold (UMT) on the Cedar River population (500 adult chinook salmon) align with the recovery planning targets and ranges set by NOAA Fisheries in the Final Supplement to the Puget Sound Salmon Recovery Plan (2006) Table 2 for the Cedar population (2,000 to 8,200 spawners)? Does this new UMT align with NOAA and Co-Manager recovery goals for this population and, more generally, the ESU? Does acceptance of a lower UMT indicate that NOAA intends to reduce the recovery planning targets and ranges for the Cedar population or other populations? If so, will NOAA reassemble a Technical Recovery Team to re-analyze recovery planning targets? Will NOAA consider the Cedar population to be a viable population if the UMT is consistently met? These planning targets are significant because they guide our goal-setting for habitat conservation and management.
- How does the proposed plan factor current and future habitat restoration efforts and other management actions in the Lake Washington/Cedar/Sammamish Watershed into assumptions about recent and future habitat improvements, and their effects on habitat productivity? Specific to the proposed new Cedar River UMT, which uses fisheries data from brood years up to 2008 to estimate MSY, how do these data factor in recent improvements in juvenile productivity documented in the Cedar River stock? For example, Chinook salmon egg to migrant survival averaged 9.8% during the period from 1998-2008, while the most recent 10-year period (2007-2016) averaged 27.6%, an almost threefold increase (Washington Department of Fish and Wildlife, 2018).

Evaluation of Juvenile Salmon Production in 2017 from the Cedar River and Bear Creek. Wild Salmon Production Evaluation Unit, Science Division, Fish Program. Olympia, WA. March, 2018). If productivity increases, does the UMT also increase or will it remain at the same level?

Thank you for the opportunity to provide these scoping/clarifying questions for consideration. We appreciate being engaged in this process, and respectfully request that NOAA ensure adequate time for stakeholder review at appropriate points in the process so we are able to effectively consult with our partners and provide meaningful input.

Please contact me if you have any questions.

Sincerely,

Jason Mulvihill-Kuntz

-

Jason Mulvihill-Kuntz
Salmon Recovery Manager
Lake Washington/Cedar/Sammamish Watershed (WRIA 8)
206-477-4780 / jason.mulvihill-kuntz@kingcounty.gov
WRIA 8 website: <http://www.govlink.org/watersheds/8/>