



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
1201 NE Lloyd Boulevard, Suite 1100  
PORTLAND, OREGON 97232-1274

January 26, 2007

Mr. Michael Carrier  
Natural Resources Policy Director  
Oregon Governor's Natural Resources Office  
State Capitol Building  
900 Court Street NE  
Salem, Oregon 97301-4047

Dear Mr. Carrier:

I want to thank you and the staff from the Oregon Governor's Office, Oregon Department of Fish and Wildlife, and other state agency representatives for producing the draft Coho Conservation Plan (CCP) for the Oregon Coast coho evolutionarily significant unit (ESU). NOAA's National Marine Fisheries Service (NMFS) staff participated as advisors to the Coho Stakeholder Team as the CCP was developed over the last two years. In this advisory capacity, we submitted staff-to-staff comments on the two preliminary Stakeholder Team drafts of the CCP. We appreciate the opportunity to be part of this ongoing effort to evaluate the draft CCP. As part of our collaboration, I am pleased to share NMFS' comments and recommendations in Attachment 1.

The NMFS recognizes that the draft CCP is not an Endangered Species Act (ESA) recovery plan. The Oregon Coast coho ESU is not listed under the ESA, and therefore, we do not provide our comments in the context of the ESA and no conclusions should be drawn from these comments regarding the adequacy of the measures in the plan for ESA purposes. We conducted our review solely in terms of how well we thought the measures in the plan would meet the goals stated in the CCP, and we support those goals for rebuilding coho populations to fishable sizes and providing numerous other benefits. We want the CCP to succeed in meeting its goals.

Our comments are intended to be an extension of the technical advice and guidance we provided during Coho Stakeholder Team meetings as the CCP was developed. While the CCP is not a recovery plan, we believe the following recommendations would strengthen the CCP's coho enhancement strategies and actions.

We support the overall conservation goal described in the CCP. The NMFS commends Oregon for the important changes it has made to its fishery harvest and hatchery management programs to address past threats. We recommend more specificity to the limiting factors, actions, and implementation mechanisms that will help Oregon implement the CCP's conservation measures.



Additionally, while the CCP emphasizes habitat restoration, we strongly encourage Oregon to include actions that protect existing high quality coho habitat.

We are impressed with the state's Coho Stakeholder Team process which enabled citizens and organizations with diverse interests to participate in developing the CCP. We appreciate Oregon's dedication to this time consuming public involvement process and the CCP has greatly benefited from stakeholder input. We strongly recommend that stakeholders continue to be involved as the CCP is implemented.

In general, our comments and requests for additional information focus on the following topics:

**Limiting Factors and Threats:** A thorough analysis of limiting factors and threats is the basis for a robust conservation plan. Therefore, we recommend more detail in describing the limiting factors, especially "stream complexity." This will enable the state to better identify and implement specific actions that address limiting factors, in coordination with a targeted research, monitoring, and adaptive management plan. We also recommend that the CCP identify human activities (threats) that are related to limiting factors.


**Specificity of Actions:** The draft CCP identifies an ambitious goal for increasing the amount of high quality habitat in order to nearly double the spawners observed during 1993-1996. It would be helpful to add more details about the population level actions that would be taken to achieve this goal and to explain how existing state agency programs and unspecified voluntary actions can achieve the CCP's goals and address limiting factors.

**Research, Monitoring and Evaluation:** We recommend that the CCP provide more information regarding the early warning system and how its adaptive management framework is linked to proposed actions. An implementation plan, together with a detailed research, monitoring and adaptive management plan, including estimated monitoring costs, would assist in addressing the attached questions.

We want to continue working with Oregon as it implements the CCP to protect and restore coho salmon in coastal rivers and estuaries. Please let us know how we can assist you in anyway to implement conservation measures and the CCP's adaptive management program.

If you have any questions about our comments, please contact our Oregon Coast coho coordinator, Rosemary Furfey, at 503-231-2149. I look forward to our continued communication on this important issue.

Sincerely,



Robert G. Walton  
Assistant Regional Administrator

Attachment

cc: Governor's Office: Knapp  
ODFW: Bowles, McIntosh, Goodson, Nicholas

## **Attachment 1**

### **Summary of National Marine Fisheries Service Comments on October 2006 Draft of the Oregon Coast Coho Conservation Plan January 25, 2007**

The National Marine Fisheries Service (NMFS) appreciates the opportunity to provide the following comments on the October 6, 2006 draft of Oregon's Conservation Plan for Oregon coast coho salmon. We recognize that this draft will undergo revisions based on comments from the public and the Oregon Coast Coho Technical Recovery Team (TRT). We therefore share these comments to assist the state of Oregon (Oregon) in producing a technically sound and robust Coho Conservation Plan (CCP) that could potentially comport with the contents commonly used in recovery plans for ESA-listed species.

#### **Overall Comments**

NMFS recognizes the difficult and complex task undertaken by Oregon to produce the draft CCP. Oregon has made good progress during the course of several previous drafts. Our review of the draft CCP reveals that this draft is generally well organized, more clearly written than the July 2006 Stakeholder Team draft, and includes descriptions of Oregon programs currently being implemented within the evolutionarily significant unit (ESU). The Executive Summary is also a good addition to summarize key points in the draft plan.

The goal of the plan is to double the number of spawners returning to the ESU within 50 years. This will require an increase in the amount of high quality habitat for the species by approximately 357 percent at the ESU scale (Table 7, Appendix 2). This is an ambitious goal that, if met, would greatly increase the likelihood of long-term survival of this species, as well as ensuring a likely surplus of fish, at least in most years, to meet cultural demands for harvest. We applaud Oregon for aiming high; however, our overall impression is that many details in previous drafts of the plan about how to do this have been taken out for unstated reasons. The basic premise of the current draft is that the goals are to be accomplished by doing more to implement existing programs. There are, however, very few new voluntary measures described in the plan that are likely to have major effects on productivity. Therefore, it is not clear how carrying out the plan will reverse the presumptive limiting factors to the degree that the goal is likely to be achieved.

Another key issue is the lack of geographic specificity for proposed actions, and no list of threats facing the species and its habitat (human activities responsible for limiting factors). There are also no criteria for determining whether key threats have been addressed, and how these criteria are linked to the monitoring and adaptive management component of the CCP. Also, very few of the actions are linked to limiting factors

(conditions limiting salmon populations) and affected life stage. It is, therefore, difficult to track how the actions will address the limiting factors.

The CCP also does not include detailed time and cost estimates to carry out specific recovery actions, beyond the general cost scenarios in Table 5, page 29. The draft plan includes proposed viability criteria, and we understand that the Oregon Coast Coho TRT will presently evaluate how these criteria compare with their recommended viability criteria.

The CCP states that it intends to be consistent with and contain *most* of the elements in a federal ESA recovery plan. Although we are not trying to evaluate the CCP as an ESA recovery plan, we are working with Oregon in other areas on such recovery plans so we want to be clear about what the requirements are for a recovery plan. Thus, it may be useful to note some basic differences between this plan and the specific technical requirements for an ESA recovery plan. The current plan would form a good foundation for an ESA recovery plan, but would need major additions including site specific management actions, criteria for evaluating the threats to the ESU, specific time and cost to carry out those measures needed to achieve the plan's goals and to achieve intermediate steps toward that goal, and identification of threats.

We commend the Oregon Department of Fish and Wildlife (ODFW) for its reforms to revise harvest and hatchery actions to conserve coho and address what used to be important limiting factors. NMFS supports ODFW's continuing commitment and cooperation to manage commercial and sport fisheries according to Amendment 13 of the Pacific Coast Salmon Plan, as demonstrated over the last 10 years. This harvest plan has passed critical review and has been revised to incorporate an even lower risk threshold for when the runs are poor. Harvest, therefore, is no longer a limiting factor for the recovery of the Oregon Coast coho ESU. The CCP contemplates allowing harvest of wild coho when a specific population recovers to healthy levels. Even though the specific criteria are not described in the CCP, the conceptual approach to open other wild coho fisheries will be the same as used for the recent Siltcoos and Tahkenitch Lakes wild coho fisheries. The NMFS supports this approach.

As with harvest actions, ODFW is proposing to eliminate a lingering limiting factor and management problem area for the ESU by closing the Salmon River coho hatchery. The North Umpqua, Coos, and Coquille coho hatchery programs are also proposed for elimination or to be reduced substantially. This brings the number of coho hatchery programs down to 3-4, with the vast majority of the 67 wild coho populations not subjected to any hatchery risks. This is truly a unique situation. Coho hatcheries are no longer a limiting factor for the ESU. Natural spawning of hatchery fish over the last 10 years has been less than the specified 10% limit, and with elimination of even more programs, natural spawning by hatchery fish will drop even further. Again, we commend Oregon for its actions to address this previous limiting factor for the ESU.

The draft plan identifies agency contributions to the CCP and identifies the need to support local watershed councils as they implement population-specific actions at scales

appropriate for conservation. The NMFS strongly supports the use of local watershed efforts and conservation strategies for salmon conservation and recovery. However, the CCP does not identify how or where these future site-specific actions will be linked to specific limiting factors, threats, life stages, and viability parameters, as Oregon is doing for ESA recovery plans in the Columbia Basin. Also, there is not a process described for further developing actions in this manner. Thus, while the plan provides a very good foundation, it would require substantial additional detail, similar to that being developed elsewhere in Oregon, Washington, and Idaho, to be consistent with requirements of an ESA recovery plan.

The coho TRT has urged Oregon to use conservation biology principles as a foundation for the CCP and we concur with this recommendation. We suggest these principles be included in the Introduction to the CCP. Also, the CCP does not contain any scientific references. We recommend that Oregon include a discussion of the conservation biology scientific literature showing how the CCP fits with current conservation principles regarding salmon populations and watershed ecology, and disclosing assumptions and uncertainties in its approach.

Oregon Plan Habitat Strategy: NMFS commends Oregon for recognizing the need to engage private land owners in coho conservation work. Given the very general description of this program in the draft plan, however, NMFS has questions about how it can best be implemented while also taking advantage of the strong system of watershed councils and soil and water conservation district (SWCDs) that are already in place on the coast. There is still a need for new positions on the coast within Oregon Department of Agriculture (ODA) and Soil and Water Conservation Districts (SWCDs), but these staff should be assisting regular operations of these programs in concert with all staff having additional training on coho restoration strategies. One coordinated outreach program needs to be developed and implemented within the ODA and ODFW program areas. Finally, this strategy needs to identify the types of projects that will be implemented, together with a lead agency to coordinate this effort, and how the Core Team will manage this process with participating entities.

The CCP identifies programs carried out by Oregon agencies (Appendix 3). The CCP needs to acknowledge that these are programmatic actions and identify which limiting factor these programs address. NMFS recommends that corresponding agency specific population level actions be identified for each programmatic action.

### **Specific Comments**

With respect to organization of the plan, there seems to be too much in the way of summaries and abstracts that repeat information. Also, the lack of page numbering in most of Appendix 3 obviously should be corrected.

### **Conservation Plan**

Page 3, para. 1: The Federal Register notice does not conclude that the ESU is “viable” as this is not the terminology used in the Endangered Species Act for listing determinations.

Page 4, first full para.: Does the plan support only non-regulatory work? Other parts of the document discuss the applicability of both regulations and voluntary measures.

Page 5, ODA: In the ODA section, it is not clear how SWCDs will improve and increase efficiency of their actions to facilitate restoration on private lands, or how they will monitor and track those actions. The NMFS recognizes the benefit of adding a new staff person with expertise in non-regulatory restoration on private lands, but we would encourage training *all* staff to have expertise and knowledge about restoration and management actions which benefit coho salmon.

Page 5: The draft CCP states that the steps identified in the Native Fish Conservation Policy for developing a native fish conservation plan are consistent with elements required in a Federal recovery plan, and on page 5, the CCP states that “The Conservation Plan would need to be modified somewhat, e.g., to include delisting criteria and actions in order to serve as a federal Recovery Plan.” As noted above, substantial modifications would need to be made to the proposed conservation plan in order to meet ESA requirements including site specific management actions, time and cost for these actions, and a research and monitoring plan based on NMFS’ new Adaptive Management Guidance. Development of an implementation plan is also important and the draft needs to identify this as a next step action.

Page 6: Oregon’s Coho Conservation Strategy: What part of the draft CCP will evaluate the effectiveness of actions proposed in the plan? Will there be an “action effectiveness” analysis to evaluate whether the actions address the limiting factors and threats? This would be a good section to identify the conservation biology principles that are the foundation of the CCP. Finally, when and how will “population-specific actions at scales appropriate for conservation” be developed? What entity will oversee and coordinate the development of these actions?

Page 9, first para.: Same comment as above about “viable.” Last para., the Federal source of much of the OWEB funds (i.e., Pacific Coastal Salmon Restoration Fund) is not acknowledged.

Page 14, list of key findings: This section should summarize habitat status and trends. Second to last bullet, the factors listed are what Oregon and NMFS agreed to call “limiting factors,” not “threats.” Threats are human actions responsible for current or future limiting factors. It would be helpful if somewhere in the plan threats were identified for the limiting factors described, so that it would become clear which actions are responsible, or pose a risk, and may need to be modified.

Page 23, first full para: This paragraph states that “regulatory changes have not completely remediated conditions created by historical practices, but have reduced the

likelihood of future degradation and loss of habitat for coho salmon.” The plan should provide further explanation for this statement, as clearly activities are proceeding in the state that allow for degradation or loss of coho salmon habitat. They may be temporary or localized impacts, or may be balanced in some cases by restoration or mitigation, but it seems unrealistic to argue that they are not happening. Even if accepted at face value, merely preventing future degradation and loss of habitat would not be sufficient to increase the amount of high quality habitat for the species by approximately 357% at the ESU scale (Table 7, Appendix 2).

Page 23, last para.: This paragraph should summarize how much high-quality habitat is available now (from Table 7, Appendix 2) vs. how much is needed to attain the plan’s viability goals. The paragraph also notes that “suitable dispersal corridor habitat” is needed, and we agree, but we could find no discussion of definition, status, location, or trends in this type of habitat.

Page 25, Limiting Factors: The top two limiting factors (stream complexity and water quality) are so general that their usefulness for prioritizing restoration actions and monitoring trends in habitat quality will be limited. With the base of knowledge available from watershed assessments, ODFW surveys, data compiled for the coastal coho assessment, etc., these factors could be refined, allowing restoration funds to be spent in a more efficient and productive manner.

Page 26, 1<sup>st</sup> paragraph, Existing Conservation Framework: Oregon has concluded that the existing regulatory structure is sufficient and is relying upon non-regulatory cooperative conservation work to achieve the desired status for coastal coho. The paragraph explains that “Modified management and regulatory programs will be considered, as necessary, by the Oregon Legislature and the various governing boards and commissions as future monitoring data are available to track trends and rates of improvement in coho and habitat conditions across the ESU.” In reviewing the Adaptive Management section of this plan, we see little information about how the Oregon Plan Implementation Team will use the information gained in monitoring and research to assess coho status and adjust actions. We suggest that Oregon needs to develop an integrated research, monitoring and adaptive management plan that is integrated across state agencies and programs and that includes:

- Goals and objectives
- performance indicators
- a list of biological and habitat responses that would be monitored
- estimates of how much effort and time would be required to detect changes
- triggers for action
- list of possible responses
- an implementation plan.

Page 27: Future Refinement of ESU Conservation Strategy: Regarding No. 3, “Time-sequenced priorities for addressing populations and reach scale limiting factors.” This, in a nutshell, is what NMFS would expect in a recovery plan under the ESA. The draft



CCP should identify when and how these proposed products and policy decisions will be carried out.

Page 27, Future Refinement of ESU Conservation Strategy: “Oregon will support development – in consultation with community-based watershed entities – of long-term conservation strategies at scales within populations, including the following products and policy decisions. 1. Participation in an ESU-wide evaluation and ground-verification of coho CWHIP maps. 2. Mapping the best sites for reach-based conservation activities. 3. Time-sequenced priorities for addressing population and reach scale limiting factors.” We agree these are important actions; however, we could not find them in any of the agency chapters in Appendix 3, raising the question of who is going to accomplish these tasks, how they will do it, when they will do it, and what funds will be used.

Page 27, Population-Based Actions and Associated Cost Estimates: This chapter does not include population-based actions. Though Table 5 refers to habitat improvement work, this chapter does not identify what type of habitat improvement this refers to. Population specific actions to address limiting factors should be the center piece of this conservation plan.

Page 28, list of assumptions: Some of the assumptions used to estimate restoration effort and funds needed to achieve desired status are not intuitively obvious and no supporting information is provided. Such assumptions and issues they raise include:

- Only instream habitat restoration work is needed to achieve high quality habitat. In other words, no benefits will accrue to the populations from recent and future harvest and hatchery management programs.

There are two problems with this assumption: First, it presumes that nothing important happens outside of the stream channel, which is counter to the watershed perspective that pervades the scientific literature for conservation of Pacific salmon (as well as the Oregon Plan). Healthy salmonid populations use habitats throughout watersheds (Naiman et al. 1992), and riverine conditions reflect biological, geological and hydrological processes operating at the watershed level (Nehlsen et al. 1997, Bisson et al. 1997). Most land management effects on streams and rivers are carried downstream readily, and some can travel upstream as well (e.g., channel head cutting). Also, watershed divides provide clear boundaries for analyzing the combined effects of multiple activities (National Research Council 1996). A watershed perspective is needed to identify and assess refugia or highly productive habitat patches, and to assess connectivity between these areas and between fish population segments (Sedell et al. 1990, Naiman et al. 1992, Li et al. 1995, Bisson et al. 1997). For these reasons, habitat conservation and restoration strategies are most likely to be effective if carried out at the scale of the watershed (or composites of multiple watersheds in a species’ range; Reeves et al. 1995, Frissell and Bayles 1996), not the stream reach (Reeves and Sedell 1992, Botkin et al. 1995, National Research Council 1996, Nehlsen et al. 1997). Second, to be effective, active restoration should include both the removal of high-impact, human-caused disturbances in salmonid habitats, and the manipulation of key in-stream, riparian

vegetation, and floodplain features to accelerate the development of desired ecological conditions (National Research Council 1996). Well-intentioned restoration that occurs without removing adverse impacts can provide only transient benefits without achieving long-term improvements (Beschta et al. 1994).

- Instream habitat complexity is the only factor limiting smolt production.

We don't understand this assumption – the coho assessment noted a variety of other primary and secondary limiting factors.

- All instream habitat restoration projects create high quality habitat.

We suggest also including alternative scenarios with a less optimistic (i.e., more realistic) assumption.

- Habitat converted to high quality habitat is sustained for 50 years.

Same comment as above – this may be overly optimistic. Many instream habitat restoration projects either don't perform as intended, or are damaged by high flows or other disturbances. Again, we suggest running some alternative scenarios.

Page 30, Abstract, Oregon Plan Habitat Strategy: This abstract should include the need for increased and more effective outreach activity that is needed to involve a greater proportion of landowners. Also, third bullet, we suggest changing “Maintaining support for the local conservation groups...” to “Increasing support for the local conservation groups” since that seems to be the plan's intent.

Page 31, second para.: Regarding the data sharing project, there would be obvious advantages to including Federal agencies, Indian tribes, and non-governmental data warehouses (such as Streamnet) in such an effort.

Page 32, OWEB Responses: The funding discussion is limited in scope. We suggest including other funding opportunities from Federal sources (e.g., USDA-NRCS, USDOC-NOAA, USDI, EPA), local governments, and non-governmental organizations (e.g., National Fish and Wildlife Foundation).

Page 44: It would be useful to identify the actions needed to implement the research, monitoring and evaluation (RM&E) and Adaptive Management sections. Identify how the early warning system will be developed. Which agency will be responsible for these actions? The NMFS is finalizing guidance for how to develop research, monitoring, and adaptive management programs and the NMFS staff will share this guidance as soon as it becomes available. We recommend that Oregon review this new guidance when it becomes available, and consider working with NMFS to make Oregon's RM&E program more consistent with the Guidance.

Page 44: Long Term Monitoring Programs: Which entity is responsible for implementing the different monitoring programs and are they fully funded? The web links may provide additional information, but key elements of the RM&E plan should be described in the draft CCP.

Page 44: There needs to be a link between the proposed RM&E plan and Oregon's Vision for ESU Desired Status described on page 20. For example, how does Oregon intend to monitor carcass goals and harvest goals? Finally, we suggest the plan estimate total costs to implement the proposed RM&E programs.

Page 44: Action effectiveness monitoring is another key element of an RM&E program which is described in NMFS' draft RM&E Guidance. This would allow Oregon to determine the success of actions addressing specific limiting factors, together with the impact on specific VSP attributes. An action effectiveness monitoring section should discuss how Oregon tracks the implementation of CCP projects. The CCP should identify the lead agency to coordinate project tracking. This component should evaluate the degree to which projects are implemented in compliance with stated CCP goals.

Page 45: Research and Evaluation Needs: We suggest that this list be prioritized. For example, a top priority should be to implement the last bullet, "develop tools to prioritize restoration projects." Are there research needs to evaluate other limiting factors and threats such as ocean conditions and climate change?

Page 45: It would be useful to define Oregon's understanding of adaptive management and how it will be applied in the different agencies. This section identifies research priorities, yet there also needs to be a framework identified and a discussion about how each agency will use research and monitoring data to revise and adapt their programs.

Page 46: Adaptive Management of Conservation Plans: Is the "Implementation Team" responsible for implementing the adaptive management component of the CCP? We have several recommendations for expanding the information reported in the annual status report described in Table 6. For example, the table should list the CCP's long-term and short-term goals, and report progress toward achieving these goals. There needs to be consideration in how the annual status report relates to the 6-year status reviews. Does Oregon have a system to track the status of achieving the CCP goals, or the degree to which actions and activities are implemented and completed? It would be good to clearly articulate the adaptive management actions or steps needed if the CCP's goals are not attained.

P. 46, Early Warning System: We appreciate the potential usefulness of this concept, but believe additional thought must be given to identifying coho population responses, predictors of ocean conditions, and other factors that could truly be useful in predicting and confirming downturns in viability of coho populations. The TRT could be particularly helpful in identifying these factors, which should be laid out in more detail in subsequent versions of the conservation plan.

Page 46: Give an example of how the early warning system will be used and describe how it can be applied within an agency’s program.

Page 47: Oversight: Conservation Plan Accountability: Many CCP follow-up activities are assigned to the Oregon Plan Core Team. Core Team tasks and responsibilities need to be consolidated and clearly described in one section of the plan. We suggest describing Core Team responsibilities at the beginning of Chapter 6 on page 29, before the individual Oregon agency descriptions. Also, the newly identified “Oregon Plan Regional Implementation Team” needs to be described. Who will be on the Implementation Team? How does the Implementation Team relate to the Core Team and Oregon agencies implementing the plan? How will the team be funded? There seem to be many layers of authority and oversight regarding implementation and reporting for the CCP. We recommend streamlining these layers of authority and perhaps focusing implementation authority with OWEB, which would report to the Oregon Plan Core Team. This is one suggestion to address the issue of accountability and focused management of the CCP.

Page 47, Table 6: The annual status report will provide a brief update on the status of coastal coho salmon. Ocean conditions are one of the key components in the viability of coastal coho, and the report should include information on recent, as well as forecasted conditions.

Page 48, Implementation Schedule: In the category “immediate and urgent implementation,” we suggest including the distribution of information about the importance and location of high quality overwintering habitat to watershed councils and the public. The dissemination of this information, whether preliminary or final, will assist with strategic planning of restoration projects and wise allocation of restoration funds.

### **Comments on Appendix 3 (Agency Actions)**

**General comment:** Most of the agency sections do not link actions to specific limiting factors (conditions limiting salmon populations) and to threats (human activities responsible for limiting factors) as would be required in a recovery plan under the Endangered Species Act. Without this linkage, we do not see how it will be possible to assess how well the proposed actions will reverse the limiting factors and control the threats to coastal coho. Also, there is no analysis of how well the actions will work together to accomplish the goals, or of what the uncertainties and unfilled needs are.

### **Oregon Plan Habitat Strategy**

Page 2, 2<sup>nd</sup> bullet: Achieving the desired status for coastal coho salmon relies heavily upon outreach to private landowners to encourage them to engage in a greatly increased level of restoration efforts. Thus, the outreach strategy should apply beyond “local communities that express an interest” to **all** communities, *particularly* ones that have been resistant in the past to participate.

Page 3, paragraphs 1-4: The description of the Habitat Strategy does not articulate clearly what the “intensified effort to engage coastal landowners in conservation actions” actually is, other than an agreement to just do more of what is already being done. Is it a focused publicity and outreach effort? If so, the plan would benefit from a discussion of the strengths and, particularly, the weaknesses, of previous outreach efforts, and how the outreach plan will be strengthened to garner greater voluntary efforts in key areas. In addition, the strategy needs to identify the types of activities that will be implemented and tracked by the Oregon Plan Core Team.

### **Oregon Watershed Enhancement Board**

Page 5: Implementation of the Habitat Strategy appears to be the number one priority of the Coho Conservation Plan. With that in mind, the first action item identified by OWEB should broaden the scope beyond highlighting the Conservation Reserve Enhancement Program to creating a resource, web based and brochures, for local entities that describe the available funding programs which can support the implementation of the Habitat Strategy. By gathering this information in a comprehensive manner in one location, local entities can easily provide a comprehensive view of restoration options available to landowners causing them to feel empowered by the ability to make their own decisions as to how they wish to participate in the Habitat Strategy.

P. 5, ODFW: First and fourth bullets, what is the timeframe for these activities? Also, in light of the emphasis placed on the Habitat Strategy, one of the specific actions taken by ODFW should include coordination with OWEB, ODA, SWCDs, and watershed councils to further implement actions on private lands.

P. 7, Research, Monitoring and Evaluation: It is unclear which of these activities are ongoing, and which are proposed. Figures 1 and 2 need more explanation and need to be referenced in the text.

Potential future efforts: It would be helpful to include a description of how OWEB could better coordinate the various agencies, including ODA, which provide funding and technical assistance to private landowners. The result could be “a one-stop shopping “atmosphere for restoration information and assistance for private landowners.

What actions will OWEB take to increase CREP participation?

### **Oregon Department of Fish and Wildlife**

**Conservation Plan Actions:** In general, these actions would be improved by including schedules and some idea of costs. As written, they are open-ended and it will be hard to tell how well they are working. Second paragraph, what is meant by “coarse wood” – wood that meets ODFW’s definition for key pieces?

**Future Actions (promote beaver dams and associated habitat):** We suggest including schedules and cost estimates, and identifying which of these actions are new.

This section does not address the impediments to beaver restoration that are caused by the statute that defines beaver as predators and allows landowners to kill them upon discovery, without a permit. In the Stakeholder Team meetings, Oregon government representatives said that the conservation plan would propose legislation where necessary to restore coho. With the increased emphasis on beneficial aspects of beaver, the plan should discuss not only voluntary reporting measures for the killing of beaver, but also the possibility of supporting a change to the subject statute. How will Oregon decide if such a change is needed? Also, the description of the proposed beaver program does not mention Animal and Plant Health Inspection Service (APHIS) of the U.S. Department of Agriculture, which also kills beaver on the Oregon coast. Is APHIS among the agencies using the “beaver habitat potential maps”? How is that affecting their activities on the coast? How will ODFW engage APHIS in the beaver initiative?

**Resources:** Not only is it important to fund specific projects that promote beaver, but it is worthwhile to emphasize to all grant proposal writers in the Oregon Coast ESU the need to consider the relationship between their proposed action and beavers. Thus, it could be made apparent to proposal reviewers that the funded effort would include not only a specific coho restoration action, *i.e.*, riparian planting, but would improve beaver habitat.

### **Oregon Department of Forestry**

We commend the Department of Forestry on their roads and fish passage improvement activities. This section includes much discussion of existing programs that do not seem to be directly related to the goal of increasing the amount of high-quality coho rearing habitat on private lands. There is little discussion of contributions to improvement of lowland, high-intrinsic potential habitat, or how specific limiting factors will be addressed at the population scale. It would also be useful to identify criteria to determine if the limiting factors and threats have been addressed.

With respect to the “Aquatic Habitat Improvement Measure” and “Riparian Management” there is no discussion of how much habitat will be restored, or where or when these projects will occur, and therefore little certainty about the outcome. Since no trees are required to be retained along perennial non-fish bearing streams, which can contribute 50% of the large wood to fish-bearing streams, it is difficult to understand how the current riparian management regime can lead to a widespread increase in the amount of high quality coho habitat. Overall, while we greatly appreciate the significant contributions made by forest landowners to coho conservation to date, we see little evidence of a level of activity in the coming years that will achieve the large boost in productivity of coho habitat needed to meet the goals of the plan.

Regarding the section on management of ODF land, we have repeatedly pointed out errors in previous drafts about the Forest Management Plan. Some of the points have been corrected, but some have not changed. If our reading of the plan is incorrect, we would appreciate a call explaining why we are wrong:

First bullet, the goal to attain mature forest condition applies to *large* and medium non-fish-bearing streams, not small and medium non-fish-bearing streams.

Fourth and fifth bullets: the “wide buffers” apply only to fish-bearing streams and *large* and medium non-fish-bearing streams, not small and medium non-fish bearing streams.

The discussion of structure-based management focuses on wildlife species – how does this strategy address the landscape conservation needs of coastal coho? This section should explain how the projected targets for stand structures compare to the current distribution of stand types. It also should discuss overall trends in harvest that have accompanied implementation of the plan. Harvest rates generally have been increasing since implementation of the plan, and there are potential cumulative effects to consider from this increased level of activity (Fig. 1). Are harvest rates likely to keep increasing, and what effects might this have on coho habitat and limiting factors?

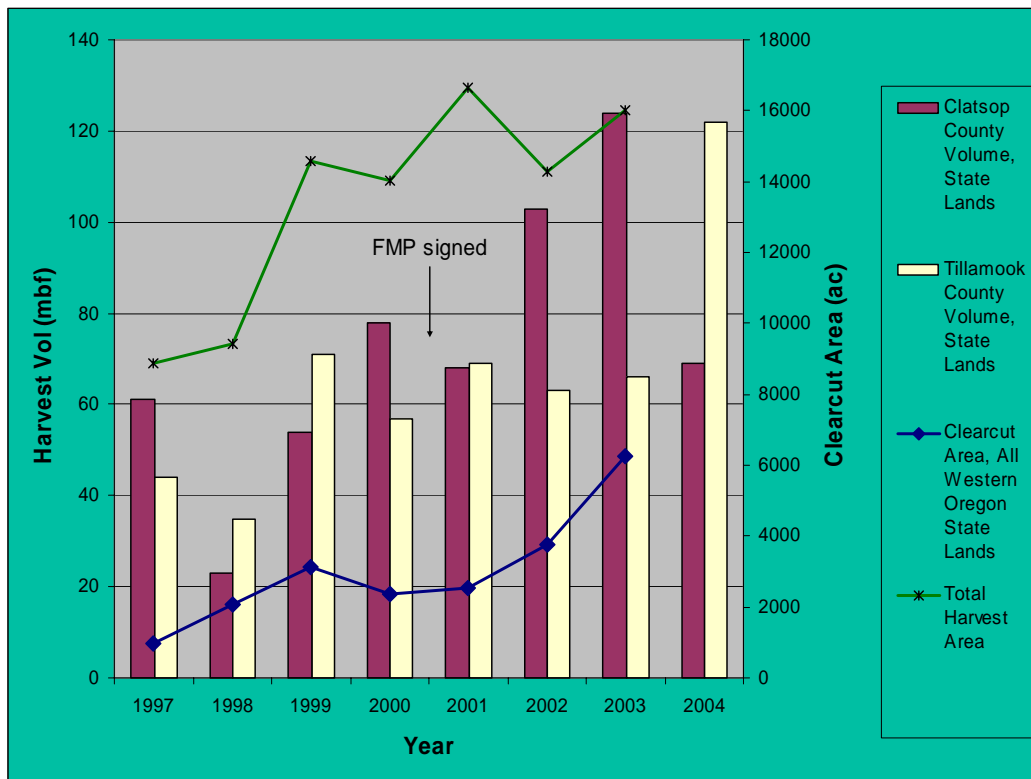


Figure 1. Timber harvest on state lands on Northern Oregon Coast, pre- and post- Forest Management Plan. Clatsop volume includes some lands outside of coastal coho ESU. Data from Oregon Department of Forestry, graphed by NOAA Fisheries, Oregon State Habitat Office.

### Oregon Department of Agriculture

Coordination among existing entities working with private landowners to conduct restoration on their land appears to be the backbone to the success of the Habitat Strategy. Thus, ODA should take a greater role in coordinating between agencies with which it works to achieve this goal, including USDA - NRCS, USDA Farm Service Agency, SWCDs, OSU Cooperative Extension Service, etc. In what ways are these efforts to be coordinated? How will implementation be tracked, monitored, and improved upon over time?

Riparian condition and water quality are related to limiting factors for certain coho populations, but they are not threats under the definitions agreed to by Oregon and NOAA Fisheries. Threats are human activities responsible for limiting factors. We appreciate that ODA made an effort to discuss these concepts, but clarification is needed.

It would be helpful to provide a measurement as to how close ODA is to its goal of “100% compliance” by landowners with the AWQM program rules. What timeline has ODA set for reaching the stated goal of 100% compliance of landowners with AWQM programs?



### **Department of Environmental Quality**

The “Recommendations” section needs to be completed.

### **Division of State Lands**

DSL actions: How will DSL expedite approval of projects with current staffing and funding levels? Are additional funds and staff needed to accomplish this?

### **Department of Land Conservation and Development**

Give examples of the types of policies and standards DLCDC staff will recommend to local governments to address limiting factors and threats? Which limiting factors and threats will these proposals, and other DLCDC programs, address? Which impacts from development are being identified? What has been the success of past efforts and how will the proposed work be implemented with existing resources? How will the impacts of development due to successful Measure 37 claims be addressed?

The activities described are primarily training and education related, what actions will be taken under Oregon’s existing land use planning laws and statutes, such as Goal 5?

What is the status of Goal 5 plans within the ESU and what is the work plan for Goal 5 implementation? It would be useful to provide more detail on the proposed action to “review and approve federal permits and actions that can affect coastal salmon habitat.”

Under what authority would this review be carried out? If this review is already occurring, how effective is this review and what have been the results?

### **Oregon Department of Geology and Mineral Industries**

What other important contributions can DOGAMI make to coho recovery in addition to the ones identified? What other roles does DOGAMI play in review and permitting of actions in rivers and floodplains? We would encourage you to review the statement that “none of the primary or secondary limiting factors” were related to regulation of mining or energy minerals in Oregon. Water quality is identified as a secondary limiting factor for ten populations. This may be due to sediment levels which could be related to DOGAMI-permitted activities. There is no information provided to support these statements. Given the importance of floodplain and off-channel habitat to coho recovery, NOAA recommends that additional tasks be identified to address potential impacts due to DOGAMI-permitted activities in habitat with high intrinsic value to coho salmon.

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