

Exhibit E

Public Correspondence

**Public correspondence received as
of March 19, 2021**

Testimony of Brian McLachlan
Oregon Fish and Wildlife Commission
March 19, 2021

Re: 2021 Coastal Salmon Seasons/Proposal to Close August Recreational Retention of Chinook

Good afternoon Commissioners and Director Melcher. My name is Brian McLachlan. I reside in Portland, Oregon.

The Pacific Fishery Management Council recently adopted three salmon season alternatives for the north and central Oregon Coast area. This management area stretches from Cape Falcon, near Manzanita, all the way to Humbug Mountain, near Port Orford.

Two of those three alternatives under consideration would take the unprecedented step (at least to my knowledge) of closing the recreational fishery to the retention of Chinook in all or half of August. These proposed closures are not for conservation purposes – my understanding is they are not designed to get a single additional Chinook back to the spawning gravel. Rather, their purpose is to take Chinook impacts away from the public recreational fishery and give them to the private commercial troll fishery, because the troll fishery may be facing a difficult season.

While both commercial and sport fisheries are subject to boom and bust years, the commercial fishery on average takes the majority of salmon harvested off the Oregon Coast, averaging 62.5% of the total catch in the last decade. And that doesn't even count its bycatch, which can be considerable. It also takes an overwhelming percentage of the prized and more valuable Chinook salmon catch, averaging 86.5% of Chinook landings in the last decade.

During the month of August in the Cape Falcon to Humbug Mountain management area, the commercial catch has averaged over fifteen thousand (15,174) Chinook for the last decade, while the corresponding recreational catch has averaged a little under twenty-three hundred fish (2,288). This means the commercial sector on average has taken 87% of the total Chinook landed in this area during the month of August, which is when and where these new recreational closures are proposed for this season.

Moreover, Council staff's analysis shows that even without any recreational Chinook retention closure this season, the commercial fleet will accrue 88% of the impacts to the limiting Klamath River fall Chinook population in the Cape Falcon to Humbug Mountain area. Closing sport retention for half or all of August will increase the commercial allocation of this limiting stock to 93% and 98%, respectfully.

Salmon management in federal and state ocean waters is an integrated process. As staff told you, after the Council adopts seasons for federal waters, this Commission will be asked to approve concurrent regulations for state waters. Thus, for practical purposes, salmon seasons in state ocean waters will be determined at the April Council meeting.

Council practices and politics being what they are, if ODFW opposes these recreational closures, there is little chance they will be approved.

Because the Commission is responsible for setting agency policy, including for salmon allocation, and because ODFW has a seat and vote on the Council, this is now on your plate. **I ask the Commission, prior to the April Council meeting, to provide policy direction to agency staff to oppose these provisions that would close sport retention of Chinook in August.**

Given the above-cited numbers, I don't see how taking prized Chinook retention opportunity away from tens of thousands of public recreational anglers and re-allocating it to the private commercial fishery is equitable, optimizes socio-economic benefits, or is in the service of rational public policy. Moreover, disrupting the traditional – albeit informal – allocation paradigm may spark an unfortunate, unnecessary, and politically contentious allocation dispute.

Thank you for your time and consideration.

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