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October 15, 2019

Dr. Bradley Smith, Chairman
Washington State Fish and Wildlife Commission
600 Capitol Way North
Olympia, WA 98501-1091

Michael Finley, Chairman
Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

Dear Chairman Smith, Chairman Finley, and Members of the Washington and Oregon Commissions:

The Snake River Salmon Recovery Board appreciates the opportunity to comment on the spring Chinook salmon sections of the joint Oregon-Washington Columbia River Harvest Policy.

Our recommendations also seek to align the Columbia River Policy with the Pacific Salmon Treaty to ensure that fishing benefits are equal to the production of salmon and where they originate, thereby also providing consideration to conservation and habitat investments made and recognizing that we in the Snake River Recovery Region are willing to invest in conservation as long as fishing opportunities exist. We believe that these recommendations are aligned with the guiding principles of promoting the conservation and recovery of endangered species, enhancing the overall economic well-being and stability of Columbia River fisheries, and increases geographic equity of sport fishing opportunity. We also believe that these recommendations do not negatively impact the other guiding principles. Additionally, RCW 77.04.012 mandates that the commission maximize public recreational fishing and hunting **opportunities of all citizens**. As stakeholders, we have observed that the current allocation split does not provide **all citizens**, regardless of geography, equitable recreational fishing opportunities for Columbia River spring Chinook salmon.

We offer two thoughts on the Columbia River Policy:

1. Regarding conservation needs that aren't being considered, both part of harvest and not part of harvest and
2. Upriver fishing opportunity.

On the first topic, it doesn't seem that we are considering conservation measures that support both natural origin spawning and recovery along with hatchery broodstock for hatchery production beyond the minimum ESA take permit requirements. This is concerning both for meeting recovery goals (natural origin spawners, continued later run-timing shifts, decreases in fish size/fecundity) and in meeting hatchery broodstock needs and relates to our Board's desire to have fishing opportunities and also meet conservation goals. Simply, the policy goal is to maximize harvest. While superficially counterintuitive, it seems that opportunities exist to provide additional conservation and fishing opportunity by allowing some additional marked and unmarked fish upriver without compromising lower river fisheries. This could be accomplished by allowing some of the earlier

returning fish that are upriver bound to move through the system and/or decrease fishing pressure at times throughout the season. Maybe this is not feasible, but it doesn't seem to be a consideration.

On the second concern, there is recognition that lower river fisheries are being prioritized for sociopolitical reasons, but a more equitable share could be allowed upriver. In some years this simply means a greater-than-zero fishing opportunity in the Snake River. The goal of the Snake River Salmon Recovery Board for both conservation and recovery is to provide fishing opportunity. Upriver fisheries are limited or non-existent and many of our stakeholders and landowner partners don't have the opportunity to fish in their local tributaries where these fish are, or were historically, present. Allowing a minor fishery in the mainstem Snake at minimum shows good will and incentive to work with us on conservation and restoration related work that benefit the Columbia system.

Of the options that still remain on the table for the Joint-State Columbia River Fishery Policy Review Committee, we strongly support:

1. The status quo option of remaining at an 80/20% split between recreational harvest and commercial harvest of spring Chinook in the Columbia Basin, and
2. A modest increase in up-river sport fishing allocation of spring Chinook from the current 75/25% for below Bonneville and above Bonneville to 70/30%.

These recommendations align with the current policy objectives, and if implemented would benefit current conservation efforts, allow for upriver hatcheries to meet brood stock needs and increase the geographic equity and certainty of an upriver spring Chinook fishery in Zone 6 and the Snake.

Again, the stakeholders and citizens of southeastern Washington appreciate the opportunity to comment on this policy. If there are any questions please contact John Foltz at the Snake River Salmon Recovery Board office at 509-382-4115.

Sincerely,

Signed By: 
Bill Bowles, Chair, Snake River Salmon Recovery Board

Cc: Kelly Susewind, Director, Washington Department of Fish and Wildlife
Curt Melcher, Director, Oregon Department of Fish and Wildlife
Ryan Lothrop, Columbia River Policy Coordinator, Washington Department of Fish and Wildlife
Chris Kern, Deputy Administrator, Marine and Columbia River, Oregon Department of Fish and Wildlife
Casey Mitchell, Chairman, Columbia River Inter-Tribal Fish Commission