



May 27, 2010

Oregon Fish & Wildlife Commission
3406 Cherry Ave. NE
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Dear Commissioners,

Salmon For All is a nonprofit trade association of Columbia River commercial fishermen and processors in Washington and Oregon, representing the non-Indian Columbia River gillnet fleet. We would like to provide public comment on the recently updated draft Lower Columbia River Conservation and Recovery Plan for Oregon Populations of Salmon and Steelhead.

To begin with, there are number of areas covered by the draft Conservation and Recovery Plan with which we are in complete agreement. Among the general principles outlined in the introductory chapter, we especially appreciate the following:

“As a conservation plan under the NFCP, the Plan for Oregon lower Columbia River salmon and steelhead populations goes beyond achieving ESA recovery requirements. Its desired status includes achievement of ‘broad sense goals’, including meeting social and cultural benefits. This approach to species recovery includes development of goals for harvestable population levels viewed essential by all the parties involved. Although some of the goals may be somewhat broader than the definition of recovery provided by the ESA, these broad sense recovery goals incorporate many of the traditional uses, as well as rural and Native American values, deemed important in Oregon and throughout the Pacific Northwest.” (Page 4 — Chapter 1)

We also concur with the statement below that local support will be essential for implementing many of the component features of the draft Conservation and Recovery Plan:

“The Plan was developed under the premise that local support of recovery plans is essential to successful implementation. As a result, consideration was given to Oregon’s contemporary political, social, and infrastructure landscape which includes a broad range of federal, state, tribal, and local needs.” (Page 6 — Chapter 1)

That the draft Conservation and Recovery Plan also calls for rebuilding Threatened and Endangered salmonid populations beyond the level of merely qualifying for delisting, but also to levels of abundance that in fact will support sustainable fisheries, is extremely heartening:

“This chapter describes the recovery goals that frame the State of Oregon’s path toward recovery of the lower Columbia River salmon and steelhead populations. First, the populations must reach desired levels of biological viability to support removal of the LCR coho and Chinook ESUs and steelhead DPS, and CR chum ESU from the threatened and endangered species list. Second, the State of Oregon seeks to rebuild the populations to provide for sustainable fisheries and other ecological, cultural and social benefits.” (Page 37 — Chapter 3)

However, the draft Conservation and Recovery Plan is not flawless, and contains some very serious errors. One of the errors is the claim that the National Marine Fisheries Service (NMFS) “designated critical habitat... for LCR coho on February 11, 2008 (73 FR 7816),” (p. 36). The critical habitat designated in 73 FR 7816 was for Oregon Coast Natural (OCN) coho. Lower Columbia River (LCR) coho are not in the OCN Evolutionarily Significant Unit (ESU). NMFS has not designated critical habitat for the LCR coho ESU, even five years after the ESA listing.

As you are very much aware, both recreational and commercial non-Indian fisheries are increasingly directed towards harvest of abundant hatchery stocks in order to protect weak and listed stocks of naturally produced salmonids. Although we have genuine concerns over the wisdom of implementing an increasing number of mark-selective fisheries without first collecting verifiable data on mortality rates of the gear forms and fishery practices employed in such fisheries, in fact fishery managers of both the states of Washington and Oregon seem intent on forging ahead with mark-selective fisheries in the near future. Thus, we are dismayed by and object to the weak support shown for continuation of harvest and hatcheries in Chapter 8 on Research, Monitoring and Evaluation:

“Priorities

“Monitoring of harvest or hatcheries basically is considered the cost of doing business. Therefore, decisions to continue existing harvest or hatchery monitoring or to implement new monitoring will be primarily linked to decisions regarding the existence of these harvest or hatchery programs. If harvest or hatchery programs exist, the monitoring described in items F and G (above) become high priority. Without this information it will be difficult to assess any of the VSP parameters in any wild populations exposed to fishery or hatchery impacts, and also to meet the management needs of harvest and hatchery programs.” (Page 310 — Chapter 8)

We concur with the statements recently made by the Columbia River Treaty Tribes at the Pacific Fisheries Management Council meetings in March and April of this year concerning increased implementation of mark-selective fisheries. To quote from the March 2010 meeting:

“The full resource impact of mark-selective fisheries, like any other fishery, needs to be accounted for. If we are to achieve our recovery goals and spawning escapement objectives, then we must control total mortality levels to sustainable levels, and this requires a full accounting of all sources of mortality upon our salmon stocks.” (March PFMC Agenda Item G.7b)

We strongly disagree with the note on p. 319 that states: “Note that mark-select fisheries will only be widely implemented if they are shown to contribute to reduced harvest impact goals.” The point of mark-selective fisheries is to provide further access by harvest to abundant hatchery populations, both for conservation purposes (to remove them from competing on spawning grounds with “wild” fish) and for economic purposes, both in the recreational and commercial fleets. At no time has the goal of mark-selective fisheries been to further reduce harvest impact goals, nor is this likely to happen. We do agree that the recommendation to implement mark-selective commercial fisheries in August and September is realistic only “if feasible.” (Emphasis added.) The timeline stated for implementation (2017–2022, possibly earlier) also recognizes that determining the feasibility of mark-selective commercial fishing during August and September, when water temperatures in the Columbia River are high (65°–70° F), is not going to happen overnight. Temperatures in that range can be lethal to salmonids without adding fishery stress to the equation. We are not opposed to mark selective fisheries *per se* when they make sense, as has been demonstrated by the successful implementation of the mark-selective fishery for spring Chinook. But, there’s a big difference between catching and releasing fish in 45° F

water and doing it in 65°–70° F water. Ocean and Buoy 10 fisheries are largely under the overview of the Pacific Fisheries Management Council. For hooking mortality purposes, Buoy 10 is considered congruent with the ocean. The in-river sport fishery above Tongue Point is still being managed on a 10% hooking mortality basis, which isn't based on any scientific studies or observations. The fact of the matter is that no one has collected any verifiable data on hooking mortalities in the Columbia River whatsoever. It simply is not responsible management to forge ahead with increased mark-selective fisheries without knowing what the true impact rates actually are, especially with respect to stocks exhibiting relatively low mark rates, such as fall and summer Chinook.

During a Lewis and Clark bicentennial presentation given by noted ecologist Daniel Botkin on the natural history lessons of the Lewis and Clark Expedition, Dr. Botkin spoke of coming to Oregon as a consulting ecologist during the early 1990s to study why the region's coastal salmonid populations were dwindling rapidly. Noting the requirement in the Oregon Forest Practices Act for logging firms to remove all large woody debris from salmon-bearing streams after logging operations, he asked to see the data on the benefits of the practice. The response was there were no data; no one had ever conducted a study of the issue. It simply was assumed to be common sense that removing logs from streams would assist salmon in migrating to and from the spawning grounds. But the assumption was wrong. We now know that placing large woody debris in waterways actually is beneficial, and helps in the creation of salmonid habitat. Mandating mark-selective fisheries without studying the true mortality rates involved, in effect, runs the risk of paralleling the mistaken notion formerly embodied by the Forest Practices Act. Rational policy should be informed by scientific data; otherwise it's a guessing game.

We have serious concerns regarding the viability of habitat in some of the subbasins identified in the draft Conservation and Recovery Plan as supporting primary populations of tule fall Chinook salmon, and in particular the Scappoose Bay watershed. We note that in the summary of Chinook Population Status, Scappoose Bay fall Chinook are listed in the draft Conservation and Recovery Plan as among 11 subbasin stocks regarded as non-viable (p. 54), yet in the overall assessment for Scappoose Bay fall Chinook, this subbasin stock is listed as a Primary population, (Executive Summary pp. 20-21). The Hatchery Scientific Review Group (HSRG) Final Systemwide Report, on the other hand, lists Scappoose Bay fall Chinook as a "Stabilizing population" (p. 31), using the levels of contribution to recovery established by the Lower Columbia Fish Recovery Board (LCFRB 2004). According to the HSRG, "stabilizing populations would be maintained at current levels (likely low viability)," (HSRG Final Systemwide Report, p. 31). The Scappoose Bay WaterShed Assessment (David Evans & Associates 2000) notes their stock status is unknown. "According to Willis et al. (1960), several hundred fall chinook spawned in the two-mile reach below the north and south forks of Scappoose Creek in the 1950s," (p. 48). The wide variability of these assessments draws into question the draft recovery plan's identification of Scappoose Bay fall Chinook as a Primary population.

As representatives of the harvest community, we must object to the lack of equitability of the Plan's implementation as regards to the "All H" sectors. Harvest exploitation rates are to be ratcheted down virtually across the board, as they have been repeatedly during the past decade and more. Yet emphasis is made in the draft recovery plan that implementation is voluntary:

"Section 9.1.3 serves as the implementation plan for the Plan. It contains actions, locations, schedule, costs, and potential implementers. In addition, a description of priorities is included. Note that many implementing entities (i.e. watershed councils, tribes, state

agencies, federal agencies) have been fully involved in developing the draft Oregon Lower Columbia River Salmon and Steelhead Recovery Plan. ‘Potential’ implementers are identified because entities were in general uncomfortable fully committing to the responsibility of a given action without assured funding, especially given the voluntary nature of this plan.” (Page 332 — Chapter 9)

One can conclude that in a recovery plan that is voluntary, as far as improvements in habitat and hydropower impacts are concerned, that harvest reductions will be the mandatory solution to make up for the lack of progress in other areas. And with hatchery fish straying onto the natural spawning grounds being identified as a problem to be eliminated or reduced to minimal levels, which with continuing harvest reductions is likely to exacerbated, hatchery programs will be defunded and go away, creating a feedback resonance with catastrophic results for communities long dependant on the economic benefits of fisheries. The assumption seems to be that harvest communities can withstand compounding economic losses until other sectors manage to progress towards recovery goals. But in reality, the lower river and coastal communities in which our fishermen live already are experiencing a wide range of poverty-related challenges, which are well-documented in “A Social Snapshot of the Columbia River Gillnet Fishery,” (Irene Martin 2005, attached). There seems to be little recognition in the recovery plan of the economic costs associated with a continually downward spiral for fishing-dependent communities and families.

Although the draft Lower Columbia River Conservation and Recovery Plan for Oregon Populations of Salmon and Steelhead does not go as far as the March 5, 2010 update to the LCFRB Recovery Plan (LCFRB 2010) in identifying a “front-loaded” recovery strategy aimed at extreme harvest reductions ahead of improvements made in other sectors, the Oregon draft plan definitely places extraordinary focus on harvest impacts:

“Although the status assessment of these populations considered multiple kinds of human-caused fish mortality, the focus here was largely on fishery harvest to estimate conservation gaps. The rationale for this decision was that the adverse selective forces associated with fisheries are widely understood as a potential genetic risk. Secondly, fishery impact rates can be measured and quantified in a direct manner unlike some of the other human related impacts which are more indirect and less tangible.” (Page 68 — Chapter 4)

As representatives of the non-Indian commercial gillnet fleet, the unscientific and speculative statements of disbelief in data collected on wild winter steelhead impacts during the commercial mark-selective fishery for spring Chinook, as expressed by certain members of the Recovery Team, call into question the credibility of the entire Recovery Plan:

“While no specific harvest rate/ranking benchmarks were used at the time the rankings were established, a retrospective analysis of the rankings based on harvest data available since 1974 showed (with one exception) that harvest was identified as a key concern for a population if the estimated average harvest rate was 35 percent or higher, and as a secondary concern if it was between 10 and 35 percent. The one exception to these benchmarks was in the case of the impact of gill net fisheries on winter steelhead in the estuary. Although available data suggests that the mortality of winter steelhead in estuary gill net fisheries has on average been less than two percent, the Planning Team believes that there was enough uncertainty surrounding the accuracy of the these mortality estimates to warrant listing it as a secondary concern for winter steelhead.¹⁹” (Page 84 — Chapter 5)

¹⁹ Actions identified in Chapter 7 related to the potential impact of gill net fisheries on winter steelhead passing through the estuary focus on gathering information to further assess this potential impact.

The fact of the matter is that real, scientific data on wild winter steelhead impacts in the non-Indian commercial mark-selective fishery for spring Chinook do exist. The gear has been tested and assigned impact rates based upon the initial data collected, and then refined by coded-wire tag data. No scientific data supports the unfounded speculation in this part of the plan. On the other hand, no concern is expressed by members of the Recovery Team regarding the impact rates of the Columbia River non-Indian recreational fleet (sport fishermen) on wild winter steelhead, even though those impacts are vastly larger than the gillnet fleet's, and sometimes by two orders of magnitude. And yet, no hooking mortality studies ever have been conducted on the Columbia River. This is a very serious error in analysis, which again calls into question the credibility of the Plan.

Again regarding steelhead, we note the following paragraph on p. 126:

“Incidental catch and mortality from gillnet fisheries targeting other stocks in the Columbia River estuary also threatens the viability of Sandy spring Chinook. The gill net fishery targets hatchery produced spring Chinook, but incidentally catches wild spring Chinook. The Sandy River's intense recreational fishery for spring Chinook is not considered a concern since the total harvest impact on the wild Sandy steelhead has been 10 percent in recent years...”

We are mystified regarding the connection made here regarding the recreational harvest impact on wild Sandy steelhead and the intense recreational fishery's impact on spring Chinook, and that these are of no concern. The recreational fishery conducts a target fishery directly in the Sandy River several days per week, all spring, while the gillnet fisheries operate 2-6 days total, and not in the tributary itself, but in the mainstem Columbia River with a sanctuary around the mouth of the Sandy River. No data has been provided regarding hooking mortalities on either stock, and to our knowledge, no hooking mortality study has been done. To utilize an unsubstantiated and undocumented assumption of a 10% hooking mortality on steelhead as a surrogate for what is occurring on spring Chinook, especially when the bi-state *U.S. v. Oregon* Technical Advisory Committee is re-evaluating hooking mortality rates throughout the Columbia Basin, is simply irresponsible. And to state that these are not a concern, but the gillnet fleet's mortality rate, which, in the Plan, is 2% or less, is simply astonishing.

Moreover, we would like to examine the steelhead mortality numbers somewhat more closely than ODFW has apparently done in the Plan. The Plan mentions a rate of 2% or just under 2% on Wild Winter Steelhead, but does not provide the supporting data for these numbers. The following numbers were obtained from ODFW for the period 2001-2009. The years 2008 and 2009 were anomalous, given that the gillnet fleet fished above Hayden Island in both years, but the impacts are as follows:

Year	Run Size	Commercial Mortalities	Impact
2001	21825	100	0.46%
2002	33711	3095	9.18%
2003	23452	217	0.93%
2004	29566	238	0.80%
2005	14672	77	0.52%
2006	16606	14	0.08%
2007	15015	75	0.50%
2008	2411	9	0.37%
2009	2514	4	0.16%

Please note that in only one year did the impact rate go above 1%, in 2002, when the first tangle net experiments were being conducted. Due to the steelhead mortality rates, the mesh size in the tangle net changed from 5 ½ inches to 4 ¼ inches, which has resulted in reduced steelhead impact rates ever since. We submit that the year 2002 does not represent an accurate figure and do not believe it should be included when calculating an average impact rate. However, even if one does include it for the impact rate for the period of 2001-2009, the average impact rate was 1.44%. If one omits the years 2008 and 2009, given that the area fished was reduced, but retains 2002, the rate is 1.78%. If one omits the anomalous years of 2002, 2008 and 2009, the rate is .54%; if one excludes 2002 but includes 2008 and 2009, the rate is .4775%. We suggest that ODFW reconsider how it has written its commentary on this particular issue and utilize the actual exploitation rates, rather than the nebulous and inaccurate “2%.” In no case do calculations of averages over the past 9 years reach 2%. Under some calculations it does not reach 1%. Looking at the impact rates on an annual basis, in only one year, 2002, did it go above 1%.

Further, we strongly urge ODFW to consider the effect its inclusion of the anomalous year, 2002, may have on selective gear development. If commercial fisheries experiments are going to succeed, there needs to be agency support for their efforts, including ensuring that impacts incurred during legitimate and agency-sanctioned experiments, which are conducted with observers and permits, will not at a later date be used against the very fishery that has made these kinds of investments. This is not a winning strategy for encouraging the development of more selective gear, nor is it an honest presentation of the efforts made to reduce impacts on the part of the commercial fleet.

As stated earlier, we fully support the goal of the draft Conservation and Recovery Plan to work towards broad sense recovery, in which recovered populations will be able to support sustainable fisheries. We also note with appreciation that the Plan seeks to retain the social and economic benefits of the Select Area fisheries associated with the Youngs Bay and Big Creek subbasins, at least in the near to intermediate term. As indicated in Chapter 10 on Broad Sense Recovery, if recovery goals can be achieved sufficiently in other areas, harvest can increasingly be redirected towards mainstem fisheries, thus reducing the lower river commercial fishing community’s dependence on off-channel fisheries in the Select Areas. While this analysis is thoughtfully articulated, the original indigenous stocks in these subbasins with regards to coho were Type N late coho. The Select Area commercial fisheries are purposely configured to harvest Type S early-returning hatchery coho from elsewhere in the lower Columbia River basin. Tributary stream flows in this region of the lower river typically do not have enough water to support viable coho spawning habitat until after the Select Area coho harvest has been completed in October. Late stock coho typically do not return until November–January. Telemetry studies of net-pen acclimated hatchery coho released in Youngs Bay indicate that these fish do not linger in local habitat. The excess hatchery smolts released from the Select Areas immediately migrate out to sea, reducing the likelihood early hatchery stocks raised in the Select Areas would compete for the same habitat likely to be utilized by naturally spawning late stock coho. It could be that an increased focus on habitat restoration in the Youngs Bay and Big Creek subbasins could provide recovery benefits for late stock coho that are fully compatible with ongoing intensive harvest activities in the Select Areas as they now exist.

We point out that the Recovery Plan nowhere refers to the extensive documentation that exists regarding the Select Areas, going back over twenty years, nor are these documents referenced in the Plan’s bibliography. We have appended a bibliography of these materials, many of which

were produced by ODFW. We have also appended comments by Tod Jones regarding the first draft of the Plan, which addressed many of the issues the Recovery Team considered to be concerns. We suggest that the Recovery Team examine these materials and consult with the staff responsible for working with the Select Areas, and revise the Plan to more accurately reflect the actual operation of the Select Areas, including the intensive monitoring that occurs.

We wish to address the subject of the Oregon matrix, which ODFW states are actually “two harvest matrices.” We differ with the agency on this topic, since the matrix contained two components, an ocean and an in-river component, until NMFS reduced it to an ocean matrix in 2007. The matrix is currently an abundance-based matrix, but ODFW appears to wish to change it to a weak stock matrix. We cannot determine how this is workable in terms of retaining any kind of successful harvest regimes either in-river or on the West Coast. We note on p. 220 that with the weak stock matrix, there would be an “average future harvest impact rate of 25% for each population.” Does this mean each population has to maintain an average of 25%? Or is this an aggregate across populations? Or does it single out the sustaining or contributing stocks but not the primary stocks? Or does it include primary stocks in low abundance years? What about the stocks that agencies deem are not recoverable?

We see no way to accomplish this goal even with mark-selective fisheries. How would the sport or commercial fisher tell a Clatskanie from a Scappoose from a Hood River fish? Individualized bar codes? On page 162, however, the plan discusses a modified Oregon matrix that would “help assure that the average is less than 25%”, based on weak stock management “which looks at the weakest grouping (stratum) of populations and sets the allowable impact to protect that weak stratum.” The question arises as to whether the state wishes the average to be 25%, or less than 25%. Both are contained in the Plan. On p. 318, contrary to p. 220, the Plan seems to be talking about managing for the weakest stratum rather than managing for individual weak stocks. Since the Gorge, especially the Upper Gorge is the weak stratum, and the ODFW Plan suggests redoing the Gorge designations, due to the dire condition of the Upper Gorge populations, we believe that there is no future for harvest anywhere, in-river or coast-wide, if exploitation rates are going to be based on what occurs regarding recovery of the weakest stocks in that stratum. Further, if ODFW is going to base harvest rates on mortalities for the weakest stratum, rather than stock, how will there be enough handling mortalities to prosecute even mark-selective fisheries?

We believe that the risk analysis study by Ray Beamesderfer, “Fishery Risk Assessment for Columbia River Coho Based on Population Viability Analysis” in the LCFRB draft Recovery Plan, Appendix E, Chapter 13, constitutes the best science available in terms of balancing recovery risks and harvest, and urge its acceptance as the foundation for an abundance-based, rather than weak stock-based, matrix:

“These analyses confirm that the Oregon harvest matrix is adequate to protect the majority of lower Columbia River coho populations in Oregon and Washington. Small fishery impact rates have little or no effect on conservation risks, even for moderately small populations. Analyses indicate that an abundance-based fishing strategy can be an effective alternative to a fixed recovery fishing rate for meeting conservation and recovery goals while balancing access to large escapements in good survival years. This analysis of fishery effects is based on relative comparisons for a given set of conditions. Relative comparisons of effects are a robust application of this modeling approach.” (Appendix E, Chapter 13, p.19)

Beamesderfer also supports developing a similar abundance-based harvest matrix for the lower Columbia Chinook ESU, as is proposed in the Oregon draft Conservation and Recovery Plan, rather than further, front-loaded harvest reductions posited by the March 5, 2010 LCFRB draft Recovery Plan. With regards to LCR tule stocks, he notes “even complete fishery closures will not increase numbers to target viability levels for small, unproductive populations,” (LCFRB, Appendix E, Chapter 14, p. 22). Further, the front-loaded strategy places a disproportionate share of the conservation burden on the harvest community, which is a violation of the equitability standard embraced by the LCFRB 2004 Recovery Plan, and endorsed by NMFS in 2005. If harvest is expected to contribute to long-term recovery, the harvest community itself must survive, which requires recognition of the economic viability upon which the harvest community depends. Harvest already has done more than its share to contribute to recovery.

We believe that a matrix utilizing weak stock management, rather than an abundance based management strategy, will prove to be a disaster for fisheries along the entire West Coast. The Plan contains no economic analysis, nor any other kind of acknowledgment, of how such a management strategy will affect harvest. We note also that the conceptual basis for adaptive management requires monitoring the results of management hypotheses; e.g., developing a monitoring plan to test one’s assumptions is an integral step in the process of adaptive management. Yet after several years of increasingly severe harvest restrictions, none of the management agencies have established metrics or tracked the data to document whether the sacrifices already made by the harvest community have in fact contributed to recovery.

We note with appreciation the recognition in the Oregon draft Conservation and Recovery Plan of the different assessments given to the Gorge stratum by Oregon’s Recovery Planning Team and Washington’s Lower Columbia Fish Recovery Board. “... Gorge populations have a relatively small amount of habitat available compared to other ESUs. This not only leads to limited restoration options in the face of significant infrastructure impacts and higher uncertainty in analytical results, but also means there is a greater likelihood that the population designations are inaccurate,” (Executive Summary, page 10). We also note that even though various fisheries are currently experiencing very low exploitation rates, there is no apparent recovery in the ESU. By contrast, stocks such as LCR coho are doing well in the Willamette and the Yakima, which leads to questions as to whether the issue is solvable by continuing to adjust harvest rates downward, or whether recovery is related to other issues. There is a point at which harvest cannot continue to subsidize the other Hs, and we believe we are well past that point, particularly with regard to the Gorge stratum.

Given that the deadline for public comment on the LCFRB draft Recovery Plan was April 9, 2010 and the deadline for submitting public comment for the NMFS 5-year reviews of West Coast listed ESUs of Pacific Salmon and DPSs of listed steelhead was May 17, we have written extensively on these issues during the past two months. Copies of the Salmon For All letters to the LCFRB and NMFS are appended for your review.

Finally, we would like to remind ODFW that commercial harvest exists to provide food for the public, not only in Oregon and Washington but throughout the United States. We see no reason to suppose that the public is not interested in obtaining salmon in the market-place. To the contrary, over-the-rail prices for salmon are excellent and demand is high. With the reduction in fish supply from fish farms, due to disease, and the Chilean earthquake, as well as wild salmonid population downturns in B.C. probably related to sea lice problems from private aquaculture facilities, demand for fresh Oregon-caught salmon will remain high in the future.

Those of us in the harvest community have every reason to want to contribute to recovery of Oregon's salmonid populations. The fish are the lifeblood of our fisheries. But, we are concerned with dwindling fishery infrastructure and financial resources to sustain our communities. If our fisheries fail, so will the other interrelated enterprises of our fishery-dependent communities. As Mike Dickerson, deputy director of ShoreBank Enterprise Cascadia, observed in a joint Oregon-Washington Sea Grant workshop discussion on the needs of coastal fishing communities three years ago, "From Southeast Alaska to San Diego, there is an extremely high probability that an ice machine will be replaced by a condominium, but virtually a zero probability that a condo will be replaced by an ice machine." Our communities are stretched to the breaking point. We cannot contribute to recovery if our fisheries fail financially. And that is a very real possibility, given some of the probable scenarios embodied by this plan. If forethought is put into sustaining fishing communities while rebuilding native fish stocks, there is the possibility of a bright future for all of us. We urge you to champion that concept. Historically, our fishermen have been among the most prominent and effective advocates for the survival of the Columbia River's once-great salmon runs. Without strong advocates for the recovery of the Columbia's salmon runs, the competing interests for water resources in the Columbia River basin will prevail, and eventually the salmon very well could lose their battle for survival.

Respectfully,

Hobe Kytr, Administrator
Salmon For All

enclosures

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