



FEB 18 2000

O R E G O N T R O U T

February 3, 2000

TO: Federal Caucus
FM: Jim Myron, Conservation Director
RE: "All-H" Paper, A Conceptual Recovery Plan

OVERVIEW

Oregon Trout appreciates this opportunity to comment on this next important step in the process of developing a formal recovery plan for federally listed salmon and steelhead populations in the Columbia basin. The region has been debating the issue of salmon recovery in the Columbia basin throughout the decade of the 90's, ever since Oregon Trout filed its petition to list Snake River chinook salmon under the federal Endangered Species Act (ESA). This current process offers a hopeful sign that we may finally be reaching the end of this long process and that a formal recovery plan may actually be adopted one of these years.

Any recovery plan that does not address all of the factors for the decline of native salmon and steelhead populations in the Columbia basin is doomed to fail. That's why Oregon Trout is pleased to see that the Federal Caucus is actually taking a critical look at all of the "Four H's". However, we are disappointed that the draft conceptual recovery plan does not offer a preferred alternative. If the aim of the recovery plan is to restore native salmon and steelhead populations in the Columbia basin to sustainable levels, and to remove them from federal listing under the ESA, it would seem that taking the most restrictive approach with all of the H's would offer the best opportunity for success.

HYDRO OPTIONS

Oregon Trout supports Option #3, the removal of the four lower Snake River dams.

1 This action offers the best alternative for the recovery of Snake basin salmon and steelhead populations. However, this action alone will probably not be sufficient to recover these stocks. Dam removal will have to be coupled with improvements to all of the other H's before there can be any assurance of recovery for listed Snake River stocks.

Removing the lower Snake River dams will also not provide any benefits to the many other listed salmon and steelhead stocks in the Columbia basin, including lower Columbia River coho salmon, Willamette River spring chinook and winter steelhead, Sandy River coho salmon and winter steelhead, and the Deschutes and John Day River summer steelhead. Thus, the need for a comprehensive plan addressing all factors of decline is essential.

To Protect and Restore Native Fish and their Ecosystems



HARVEST OPTIONS

Oregon Trout supports Option #3, Conservation Fishery Levels for Columbia basin fisheries.

Since we are currently in a conservation crisis with these populations, anything less than a conservation response is not acceptable. Mixed stock fisheries should be terminated and replaced by selective fisheries that harvest only hatchery fish. Non-selective fishing gear should be replaced with selective gear. Since the treaty tribes are the only entities with a guaranteed harvest right, they should be the last fishers to be constrained and the first ones to be allowed to harvest once stocks have rebuilt to sustainable levels.

HATCHERY OPTIONS

Oregon Trout supports Option #3, Increase Conservation Programs and Significantly Decrease Mitigation Programs.

The focus of hatchery programs in the Columbia basin should be on rebuilding naturally spawning populations of wild fish, not on providing fish for consumptive uses, especially if harvest is to be managed at conservation crisis levels.

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HABITAT OPTIONS

Oregon Trout supports Option #3, Increase Federal Role under CWA and ESA.

While Oregon Trout has generally supported the concept of voluntary programs such as the Oregon Plan for Salmon and Watersheds, it's essential that these voluntary programs be backed up with strong regulatory programs at the state and federal levels. As such, it is incumbent upon the federal government to fully implement all regulatory tools at its disposal. Habitat destruction has consistently been named as one of the primary causes for the decline of Columbia basin salmonid populations. Therefore, adequate recovery measures addressing habitat structure, condition, and function are critical.

CONCLUSION

Restoring native salmon and steelhead populations in the Columbia basin to sustainable levels so that they may be taken off the endangered species list will require strong actions by the federal government. These actions must address all of the factors for decline if the region hopes to have a federal recovery plan for these valuable fish that will not only be legally sufficient but also have a hope of being successful.

Failing to sufficiently address all of the factors for decline at this time will likely lead to further extinctions, more litigation, and an overall decline in the quality of life for salmon and citizens alike in the Pacific Northwest.