

April 2019

RECEIVED

APR 04 2019

PFMC

The Confederated Tribes of the Colville Reservation

P.O. Box 150, Nespelem, WA 99155

(509) 634-2200

FAX: (509) 634-4116



March 29, 2019

Mr. Phil Anderson, Chair
 Pacific Fishery Management Council
 7700 NE Ambassador Place, Suite 101
 Portland, Oregon 97220-1384

Re: PFMC/NOF Consideration of Ocean Harvest Options for Chinook Salmon

Dear Mr. Anderson:

The purpose of this letter is to express the preference of the Confederated Tribes of the Colville Reservation (CTCR) for the 2019 North of Falcon Ocean Summer Chinook Fishery Option 3.

The CTCR includes 12 tribes including approximately 10,000 enrolled Tribal members. The Colville Reservation is located at the terminus of anadromous salmon migration on the Columbia River in north central Washington. Our waters include both healthy runs of summer-fall Chinook and sockeye salmon as well as ESA-listed stocks of spring Chinook salmon and steelhead trout. The CTCR are a salmon people and historically our ancestors fished at many sites throughout the Columbia Basin, including the extremely productive Kettle Falls fishery. Due to over-harvest by commercial fisheries in the late 1800's, habitat destruction by European settlers, and hydroelectric system development in the Columbia River Basin, including but not limited to the construction of Chief Joseph and Grand Coulee Dams, the salmon runs that used to support our Tribes' subsistence and cultural needs were nearly lost and are currently a fraction of what they were. Current CTCR fisheries are constricted to a very limited area in the Wenatchee River, at the tailrace of Chief Joseph Dam, and in the Okanogan River. Summer Chinook and sockeye salmon comprise the majority of our harvest and in recent years our harvest has improved from a few hundred fish to a few thousand fish each year for our Tribal membership. However, this still does not meet the cultural and subsistence needs of the CTCR. We do not have a commercial salmon harvest because the basic ceremony and subsistence needs of our Tribe are not fulfilled by contemporary salmon runs.

The commercial and recreational harvest in the ocean of upper Columbia summer Chinook greatly influences the availability of salmon to the CTCR because we share the non-treaty allocation with the State of Washington. In 2007, WDFW and the CTCR entered into a voluntary harvest-sharing agreement ("2007 Agreement") for jointly-managed upper Columbia salmon and steelhead stocks and we have worked closely with WDFW each year to manage terminal fisheries to ensure that hatchery brood and spawn escapement objectives are met. Chapter II.A. of the 2007 Agreement reads "Principles of the Colville Tribes – Lower Columbia River and ocean harvest of salmon and steelhead stocks arising from the Okanogan River and Columbia Confederated Tribes' of the Colville Reservation Comment Letter to the Pacific Fisheries Management Council re: Chinook Ocean Harvest Options

River below Chief Joseph Dam (which constitute the Colville Tribes' anadromous fish harvest and management areas) must allow sufficient fish to return to provide the Tribes a stable, equitable, and sufficient ceremonial and subsistence (C&S) fishery." With low run sizes, such as 2018 and 2019, the vast majority of non-treaty harvest of UCR Chinook are allocated to the ocean, regardless of which Option is selected by PFMC. In addition, the practice of taking ocean harvest 'off the top' of the non-treaty share leaves very few fish for sport and tribal fishermen upstream of PRD and is therefore not consistent with the intent of Chapter II.A of the harvest sharing agreement. In many years we have forgone portions of our harvest allocation to achieve hatchery and wild population objectives because we recognize the importance of preserving salmon for future generations. The CTCR strongly believes it is not fair for so much of the burden of conservation to fall onto the terminal fishermen.

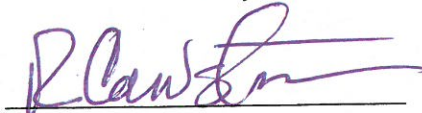
As you know, the UCR summer Chinook forecast is amongst the worst in the last twenty years. We understand that the low run size for Chinook is affecting most stocks in the Pacific Northwest and everyone who fishes will be making sacrifices during the lean years that follow poor environmental conditions.

WDFW has provided detailed modeling scenarios to forecast the CTCR allocation given Options 1-3 in the North of Falcon season setting process as described in the attached Table A. Option 1 (the highest ocean harvest option) would completely consume the non-treaty share of Okanogan summer chinook and eliminate the Colville cultural and subsistence fishery for summer Chinook in 2019. In Option 2 the Colville share would be merely 292 fish and in Option 3 it would increase to a modest 585 fish. Even the most generous option, Option 3, would only provide one salmon for every 17 members of our tribe. Option 3 will also provide the most escapement for natural spawning and broodstock collection, ensuring the best opportunity for future fisheries. In 2018, local hatcheries barely made broodstock quotas and the spawning grounds were not fully seeded. We expect the situation to be even worse in 2019. If the PFMC adopts Option 1 or 2 it will reduce future opportunities to harvest salmon in the ocean and rivers, for people and for iconic animals such as Orcas, bears, eagles and otters.

Therefore, of the options under consideration in the North of Falcon process, the CTCR recommends that the PFMC adopt Option 3 for the North of Falcon ocean fisheries, thereby limiting ocean harvest of Chinook to 22,500 and coho to 94,400.

The CTCR appreciates the opportunity to provide our perspective and preference to the PFMC and we respectfully request the opportunity to share this information first hand by providing testimony to the PFMC at your meeting in Rohnert Park, CA on April 11, 2019.

Sincerely,



Rodney Cawston, Chair
Colville Business Council

Confederated Tribes' of the Colville Reservation Comment Letter to the Pacific Fisheries Management Council re:
Chinook Ocean Harvest Options

Table A

2019 Pre-season Summer Chinook Harvest Plan				
		PFMC Ocean Option 1	PFMC Ocean Option 2 Total	PFMC Ocean Option 3
		Total Chk Harvest = 32,500	Chk Harvest = 27,500	Total Chk Harvest = 22,500
	Ocean Non-Treaty Harvest (UCR Sum Chk)	7,460	5,972	5,042
	Columbia River Rin Size (UCR Sum Chk)	35,900	35,900	35,900
	Total abundance (Modeled ocean harvest + forecast escapement)	43,360	41,872	40,942
50%	Total Treaty Indian Allowable Harvest	7,180	6,436	5,971
50%	Total Non-treaty Allowable Harvest w/Ocean	7,180	6,436	5,971
	Total Non-treaty Allowable Harvest In-River	-280	464	929
	Below Priest Rapids Dam (PRD) Allocation	-28	46	93
	Above Priest Rapids Dam Allocation	-252	418	836
10%	Non-Treaty Fisheries Below PRD			
20%	Commercial	-6	9	19
80%	Sport	-22	38	74
Total	Below PRD	-28	47	93
90%	Non-Treaty Fisheries Above PRD			
	Wanapum Tribal	22	22	22
70%	Colville Tribal	-176	292	585
	Sport (PRD to Chief Joseph Dam)	-98	103	229
Total	Above PRD	-252	417	836
	Escapement past all Fisheries (for spawning and hatchery brood)	29,000	29,000	29,000

Confederated Tribes' of the Colville Reservation Comment Letter to the Pacific Fisheries Management Council re:
Chinook Ocean Harvest Options

