



Pacific Fishery Management Council

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Dan Wolford, Chairman | Donald O. McIsaac, Executive Director

~~October~~November X, 2011

Dr. Rebecca M. Blank, Acting Secretary
U.S. Department of Commerce
[Address]

Dr. Jane Lubchenco, Administrator
National Oceanic and Atmospheric Administration
[Address]

Mr. Eric C. Schwaab, Assistant Administrator for Fisheries
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
[Address]

Dear Dr. Blank, Dr. Lubchenco and Mr. Schwaab:

We write to you today about an issue of great importance to West Coast salmon fisheries and the communities that depend on them: the protection and restoration of Columbia-Snake River Basin salmon and steelhead. As you know, these fish are a tremendous economic, cultural, and biological resource to the Pacific states and the nation. They support and contribute to ecosystems from Alaska to California, and as far inland as Idaho and Montana.

Federal efforts to craft a protection and restoration plan for these imperiled species that has ~~survived~~passed Endangered Species Act (ESA) judicial review have ~~thus far failed~~been challenging. On August 2, U.S. District Court Judge James Redden ~~invalidated~~remanded the most recent plan, NOAA Fisheries' *2010 Biological Opinion for the Federal Columbia River Power System* (BiOp). This was the fourth federal salmon plan to be ~~ruled inadequate~~remanded since 1995. As the entity charged with helping NOAA Fisheries guide the management and stewardship of Pacific salmon resources in California, Oregon, Washington, and Idaho, the Pacific Fishery Management Council believes that a new approach to addressing the challenges of Columbia Basin salmon restoration may be warranted.

To that end, we encourage NOAA Fisheries to convene a collaborative process where regional stakeholders can work alongside Tribes and Federal and state agencies to develop a salmon restoration blueprint that is legally sound and guided by science, with the goal of meeting the diverse needs of affected communities.

To be truly effective, this ~~stakeholder~~ process ~~or “solutions table”~~ must be transparent and inclusive, and must ~~place~~ include non-governmental stakeholders ~~at the table with the sovereign parties to work together in the development of a successful plan~~. We believe that by working collaboratively, the Basin’s diverse interests can craft a plan that recovers salmon, builds jobs, and enhances local and regional economies.

Collaborative processes have proven successful in addressing other natural resource challenges across the West Coast, including on the San Joaquin River, in the Klamath Basin, and on the Elwha River. A similar effort in the Columbia-Snake Basin – one that includes all parties with a stake in salmon restoration, and that is committed to exploring all scientifically-credible recovery options – would help move the salmon debate beyond the courtroom while greatly improving the resulting plan’s probability of success.

Existing, ongoing processes such as the Salmon Recovery Planning process, Regional Implementation Oversight Group and the court-ordered remand of the 2010 BiOp could help inform and strengthen the work of a collaborative stakeholder effort by bringing additional scientific, economic, and technical expertise to bear on stakeholders’ policy discussions and decisions. By leveraging the work that Federal, state, and Tribal agencies are doing at a BiOp-specific level, regional stakeholders could then expand the dialogue to help address the broader needs and priorities of affected communities. A collaborative process for the Columbia Basin, like similar efforts elsewhere, would likely be funded by a blend of state and federal support. This type of process could produce a regional plan that is beneficial to both fish and affected communities.

After more than twenty years of Endangered Species Act listings and litigation, a fully inclusive, basin-wide, solutions-oriented collaborative stakeholder process ~~has never truly been attempted~~ is needed in the Columbia Basin. Previous tiered approaches that ~~excluded~~ have not included ~~non-sovereign~~ regional stakeholders ~~from~~ in crucial discussions and decisions have so far failed to yield a plan judged sufficient to meet ESA legal requirements, creating more uncertainty for the region. The Pacific Fishery Management Council strongly urges NOAA to make the most of the two year period provided by the Court before a new BiOp is due, and to begin collaborative talks as soon as possible.

We hope NOAA, in cooperation with their co-managers at U.S. Fish and Wildlife Service who collectively administer the ESA program for aquatic and terrestrial species, will convene this collaborative stakeholder process in the months ahead; we stand ready to assist in any way.

Thank you very much for your consideration of our request.

Sincerely,