



## Alaska Trollers Association

130 Seward St., No. 205  
Juneau, Alaska 99801  
(907) 586-9400  
(907) 586-4473 Fax

May 13, 2015

Protected Resources Division  
NMFS West Coast Region  
501 West Ocean Blvd., Suite 4200  
Long Beach, CA 90802-4213

### **RE: NOAA-NMFS-2015-0039 Petition to Delist Snake River fall Chinook ESU**

To whom it may concern:

I am writing on behalf of Alaska Trollers Association (ATA) in support of the petition to delist Snake River fall Chinook (SRFC) under 16 U.S.C. §1533(b)(3)(A) of the Endangered Species Act (ESA). It is encouraging to see National Marine Fisheries Service's (NMFS) acknowledgement that the substantial scientific information included in the petitioned has merit and that delisting of this ESU may be warranted.

ATA represents commercial salmon trollers who operate in both state and federal waters off the coast of Alaska. Our fleet is 85% resident and nearly one of every 35 people in Southeast Alaska works on a troll boat. Fortunately, there are no ESA listed stocks in Alaska. However, ATA has been involved in the management and regulatory processes surrounding SRFC since soon after its listing, because our members and communities have been significantly impacted by NMFS' decisions regarding recovery of SRFC and other Pacific Northwest ESA listed stocks.

While Alaska fisheries have always had a de minimis impact on SRFC, in the early 1990's we were subjected to an annual ESA Section 7 incidental take permit. Under the terms of that permit trollers directly lost tens of thousands of harvestable fish each year to return a single Snake River spawner to the river. Since 1999, this permit has been attached to the Pacific Salmon Treaty (treaty) agreement. To date, two 10-year incidental take permits have been issued for the U.S. fisheries under treaty jurisdiction. The most recent Biological Opinion that provided the basis for those permits showed that the SRFC ESU has rebounded and is at almost no risk of extinction.

NMFS is familiar with the long history of habitat destruction that ultimately led to ESA listing of the SRFC. The Hell's Canyon Dam complex blocked 83% of this magnificent animal's spawning habitat, and dozens of dams and other diversions and development have killed salmon and made passage treacherous for migrants moving both upstream and down.

However, with boosts from several directions, Snake River salmon have found a way to adapt, survive, and increase in number. As the delisting petition so aptly points out, the SRFC ESU no longer meets any reasonable standard for listing under the Endangered Species Act (ESA). It is time to remove it from the list.

Fisheries restrictions all along the coast and a thoughtfully developed series of hatchery programs helped to preserve the genetic integrity of the original stock, which has led to a successful reintroduction of SRFC to the portion of its habitat that is still accessible above Lower Granite Dam. In 2014, 60,000 fish returned to spawn – far and away over the ESA recovery goal of 3,000 fish.

It is important to note that the SRFC have successfully achieved healthy escapements for nearly 10 years, even in the face of variable catch scenarios along the coast and in the Columbia River Basin. In fact, since 2006, the robust SRFC ESU could be said to have achieved ‘highly viable’ status judging by NMFS standards for abundance, productivity, diversity, and spatial distribution. The agency’s 2008 Biological Opinion associated with a 10 year PSC agreement, stated that the SRFC’s short and long term risk of extinction was deemed to be 0% and 1%, respectively.

Since the SRFC were listed in 1992, a number of other improvements have been made to assist juvenile salmon as they make their way to sea; most importantly, flow augmentation as mandated under the Snake River Water Rights Act of 2004. In addition, management of salmon fisheries from California to Alaska remains extremely conservative and is responsive to changes in abundance, due to action by the Regional Councils, state agencies, and Pacific Salmon Commission. These situations are likely to continue well into the future.

The 2013 and 2014 SRFC escapements were the highest since 1962, and many times greater than the 390 fish estimated to have returned in 1991. This is significant, and far surpasses NMFS’ recovery goal of 3,000 natural spawners in the Snake River Basin. In fact, from 2005-2014 the SRFC average return totaled 6,398 natural spawners to the Snake River watershed; add in the hatchery fish and that number swells to 18,347 – far above a 10-year geometric mean of 3,000. Given the recent record abundance of both wild and hatchery SRFC, it seems safe to say that this ESU has ‘recovered’ to the extent that existing habitat will allow - and is thriving - so no longer needs the boost of ESA protection.

ATA supports strong conservation measures to protect fisheries resources and our members are always willing to accept their share of the conservation burden. However, ESA listings and protections were only ever intended to be used as a last resort, not when other management programs and forums exist that are proven to adequately protect a species.

The recovery of SRFC is an unquestionable ESA success story; one that the agencies and industry can all be proud of. We encourage NMFS to now acknowledge the merits of this petition and move to delist the SRFC ESU without delay.

Thank you for considering ATA’s point of view.

Best regards,

Dale Kelley  
Executive Director