

November 25th, 2020

From: Jay Gordon, Board Member and Chehalis Valley Farmer

Dear Chehalis Basin Board Members,

The Chehalis Basin ecosystem offers one of the best chances in the State and region to build sustainable salmon and amphibian populations. The Governor's Chehalis Basin Work Group in 2012 initiated the effort to protect and restore aquatic species in the Basin with an unprecedented investment in science to take us from data poor to a comprehensive understanding of the freshwater habitat and how it is used by the species. This investment in science has been continued by the Chehalis Basin Board along with the development of the draft Aquatic Species Restoration Plan (ASRP). Throughout the last 9 years, I have been a strong supporter of the Board's dual purpose to reduce flood damage and restore aquatic species habitat. I will continue to be an advocate for both. However, I have serious questions about the current proposal for the ASRP and its ability to be successful in light of other factors affecting salmon beyond the freshwater habitat focus of the ASRP. I request the Board explore in more depth several questions affecting the priorities and constraints of the ASRP.

In 2019, the ASRP Steering Committee requested public input on the Phase 1 ASRP document. The Washington State Dairy Federation (WSDF) submitted a 11-page comment letter which I co-authored (attached). There are numerous concerns in the letter, which I have raised subsequently in Board meetings: the scientific basis for large habitat corridors proposed in the ASRP, the need to strategically invest in the most important actions early in the implementation of the plan, and how other factors affect salmon in addition to freshwater habitat. To date, I have not received the information I need to know if the ASRP, which currently proposes to restore 550 miles of habitat for \$1 Billion, will be successful.

I request the Board receive more in-depth briefings from the Steering Committee and Science Review Team on the basis for the habitat corridors and how the recommended first phase of ASRP implementation strategically focuses on the most important early actions. I also request the board send a letter to the Washington Department of Fish and Wildlife, the Quinault Indian Nation and the Confederated Tribes of the Chehalis Reservation requesting them to brief us on how harvest, hatcheries, predation and prey are being managed or could be managed in a manner that will support the success of an ASRP.

I am not the only person asking these questions. I am in frequent contact with other farmers and landowners in the basin. They are asking the same questions. These are some of the same people whose land will be the focus of habitat restoration. The farmers in the basin have a long history of working to improve conservation on their lands. These farmers, and the WSDF, have decades of experience in how to build and deliver conservation on their lands, conservation that works for both our farmers, for the ecosystem, for many important species and for the benefit of citizens in Washington State. I raise these questions not just on my behalf but for other basin landowners who want to know their participation in habitat restoration will have a high likelihood of successfully protecting and enhancing the prosperity of the basin aquatic species.

Draft Letter to DFW and Tribes

To: Kelly Susewind, Director Department of Fish and Wildlife, Fawn Sharp and Harry Pickernell Sr.

The Chehalis Basin Board, with the assistance of your staff, support the development of an Aquatic Species Restoration Plan (ASRP). This is part of the Board's dual mission to aggressively pursue the reduction of flood damage and restore aquatic species in the Chehalis Basin. We request your support in the next several months to better understand how other factors affecting the basin salmon and steelhead runs, and other aquatic species, can be managed in a manner that would complement the unprecedented level of habitat investment the Chehalis Basin Board is currently being asked by the ASRP Steering Committee to consider.

In response to a request from the Governor, we are working over the next few months to develop our recommendations for the future actions of the Chehalis Basin Strategy to address both flood damage and aquatic species. Our recommendations will be provided to the Governor and legislature before the end of March 2021. In November of this year, we received a briefing from the ASRP Steering Committee, led by your staff on the current recommendations for the ASRP. The proposal is to restore 550 miles at an estimated cost of \$1 Billion. The ASRP is focused on protection and restoration of fresh and estuarine habitat. As you know, in order for the investment in habitat to be successful, a number of other factors affecting salmon also need to be addressed. We request your support to better understand the how the following issues could affect the success of any efforts to protect and restore habitat in the basin:

1. **Spring chinook.** The basin's Spring Chinook population is in dire condition. The proposal in the ASRP is to focus the first ten years of habitat improvements in areas that will most directly benefit Spring Chinook. However, habitat restoration will take decades to achieve its full benefit. Are there other immediate actions that should be considered, such as supplementation and re-introduction into parts of the basin like the Wynoochee and Satsop rivers?
2. **Harvest.** Is harvest -- both in-Basin and in-Ocean -- limiting the return of salmon and steelhead in the Basin to levels that do not fully utilize the currently available habitat? (harvest of both salmonids and of prey species such as herring/anchovy/etc.) Is there sufficient data for the basin-specific fisheries to make good decisions? Are there sufficient enforcement resources to ensure ocean and basin harvests are following best science and season quotas to protect and restore aquatic species in the basin? Are harvest techniques and timing sufficient to avoid harvest of imperiled species such as Spring Chinook? Will harvest need to change to support an increase in returns to fully utilize the increased habitat achieved from forest changes, more access from culvert replacement and the habitat work portion of the ASRP?
3. **Predation.** What is currently being done, and what more is necessary, to reduce the predation from pinnipeds and exotic species such as bass in the basin?
4. **Hatcheries.** Hatchery programs are intended to provide fishery benefits to both treaty Indian and non-treaty fisheries within the basin and in the ocean. The programs were primarily initiated to offset declines in wild fish production because of habitat degradation. How are hatcheries in the basin currently being managed for conservation, supplementation, mitigation, or other purposes? And are there changes under consideration as part of the ongoing joint hatchery policy reform efforts that could compliment habitat restoration for wild salmon?

We understand and respect that you have been working hard to address these issues over the years. We also understand your co-management of the fisheries is affected by factors and influences that are

not fully under your control (for example climate change, and regional and international decisions on harvest). And we recognize there is uncertainty in the science and political process. It is our request that you help us understand how these issues are currently being addressed. What additionally can be done to optimize the potential success of a holistic restoration program; a plan and program that includes habitat protection and restoration working in concert with improvements to other key limiting factors affecting the aquatic species.

Sincerely,

Chehalis Basin Board