



NORTHWEST SPORTFISHING
INDUSTRY ASSOCIATION

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November 30, 2018

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C/O Becca Conklin
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600
Via email: <http://ws.ecology.commentinput.com/?id=x2M6a>

Re: Short-term modification to adjust total dissolved gas (TDG) levels in the Columbia and Snake rivers. Scoping for DEIS

Director Bellon,

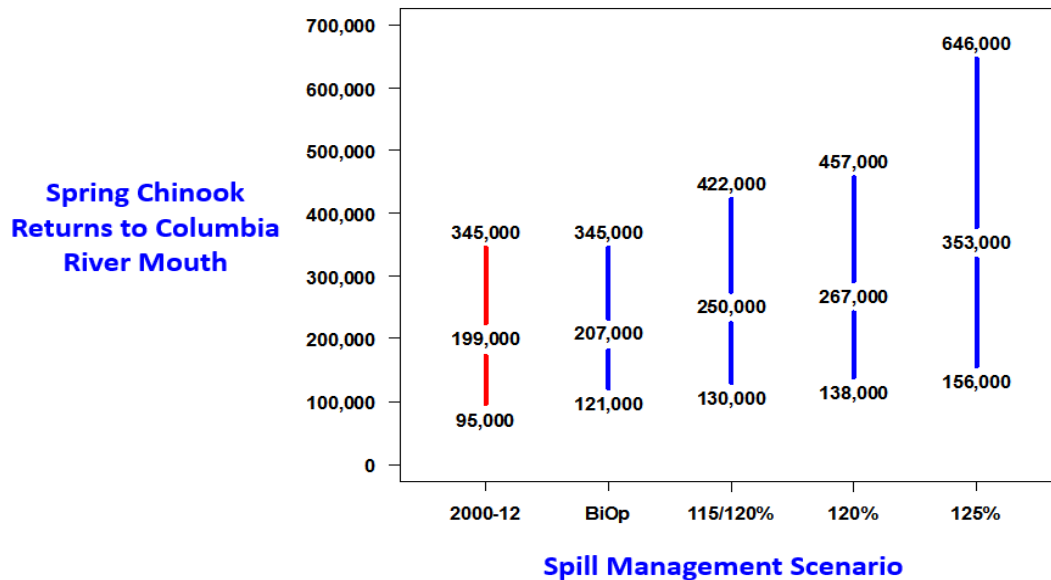
On behalf of the Northwest Sportfishing Industry Association (NSIA), thank you for the opportunity to comment on the scope of your draft Environmental Impact Statement (EIS), which will evaluate potential environmental impacts of a short- modification to adjust total dissolved gas (TDG) levels in the Columbia and Snake rivers. The NSIA consists of hundreds of businesses supporting thousands of family-wage jobs for which the Columbia Basin fisheries are essential to their success.

Specifically, Columbia River Spring Chinook, the primary beneficiaries of the additional spill requested by NSIA, are of critical importance because they are the first salmon of the year. As such, the spring chinook salmon fishery plays an oversized role in enticing nearly 400,000 anglers in Washington and Oregon to purchase an endorsement to fish in the Columbia. For these first salmon, our customers from Illwaco, Washington to Riggins, Idaho spend money to prepare their boats, motors and trailers, purchase fishing gear and licenses with endorsements and start a new year of fishing. Thus, a successful spring chinook season sets the table for a successful year for our industry.

To communities all along the river, Columbia River Spring Chinook are worth their weight in gold. According to the Washington Department of Fish and Wildlife, anglers on average spend over eight days fishing for every Spring Chinook retained. A 2009 study of Columbia River Spring Chinook fishing done by [Southwick Associates](#), calculated that trip expenditures for this fishery weighed in at \$115 per trip in 2006 dollars. ***In other words, for every Spring Chinook retained, \$920 was spent on trip expenditures by anglers.*** These numbers do not account for boat, motors, trailers and durable goods. It is difficult to overstate the economic importance of Columbia River Spring Chinook to the sportfishing industry.

More recently, our region has learned of the importance of Columbia River Spring Chinook to Southern Resident Orca. SRKW circle off the mouth of the river in March when Spring Chinook are staging to enter the river. The fat-laden Spring Chinook nourish pregnant and traveling SRKW at a time when there are scant other chinook available. But, these spring chinook, so very valuable to communities and critical to Orca are in trouble. The 2018 adult return was the lowest since 2007, and the jack returns were the lowest since 2006, which bodes ill for next year.

Decades of extensive data gathered by the multi-agency, collaborative, Comparative Survival Study (CSS) has demonstrated that the best thing we can do short term to enhance the numbers of returning adult spring chinook is to spill to 125% total dissolved gas. There is no other single action that can be taken in the short term to bring back more salmon. Below is the graph presented to Governor Inslee’s SRKW task force by the CSS Manager. It shows clearly the benefits in terms of increased spring chinook returns of allowing TDG levels of 125%.



It is NSIA’s firm belief that WADOE must include an alternative that considers TDG levels of 125% in the dam tailraces with no forebay standard in the EIS you prepare. We fully understand that regional discussions are occurring that may decide to utilize a different total dissolved gas level in 2019. Developing, analyzing and considering a 125% TDG alternative will give the region’s fishery managers an understanding of the trade-offs among alternative levels of TDG and allow a decision that follows the science. We believe that decision will be to adjust the TDG standards on a short-term basis to allow 125% TDG as it has been clearly demonstrated to provide the greatest benefit to salmonids. Governor Inslee asked us to be bold in our recommendations to increase prey and decrease threats to SRKW. We trust your scoping effort will lead to an EIS that will fully inform managers to you make this important decision.

We thank you for your time and effort on this matter of critical importance to salmon, steelhead, Southern Resident Orca and our industry.

In Service,

Liz Hamilton, Executive Director
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 503.631.8859