



Columbia River Salmon Fishery Policy Workgroup (CRW)

Public Comments received between July 2, 2020 through July 14, 2020

This is a compilation of comments received at through our online public comment portal after the Joint-State PRC was put on hold.



BOARD OF COMMISSIONERS
CHELAN COUNTY
STATE OF WASHINGTON
COUNTY ADMINISTRATION BUILDING
400 DOUGLAS STREET, SUITE #201
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CATHY MULHALL
County Administrator
cathy.mulhall@co.chelan.wa.us

CARLYE BAITY
Clerk of the Board
carlye.baity@co.chelan.wa.us

June 29, 2020

Washington Fish and Wildlife Commission
Attn: Chairman Carpenter
PO Box 43200
Olympia, WA 98504-3200

Dear Chairman Carpenter,

Chelan County is submitting this letter in regard to the pending harvest recommendations of the WDFW Columbia River Fishery Policy Workgroup.

Immense sacrifices have been made by landowners in the Upper Columbia (UC) region to support habitat restoration for the benefit of ESA-listed spring Chinook (endangered) and steelhead (threatened). In the past 20 years, over 500 habitat projects have been implemented to support recovery, primarily on private lands. In turn, harvest management is intended, in part, to allow more fish to return to natal spawning grounds for both conservation and fisheries. Integration of habitat and harvest (as well as the other H's) will be necessary if we are to recovery our ESA-listed salmonids. UC spring Chinook are of great conservation risk, as they are the weakest populations of the Upriver spring Chinook stock.

In order to support conservation, we ask the WDFW Commission to:

- Retain the existing ban of non-treaty commercial fishing in the mainstem Columbia river for spring Chinook.
- Retain the existing 80%/20% split between recreational and commercial fishing to ensure opportunities remain for recreational fisheries in the Upper Columbia.
- Retain the existing policy that any unused impacts allow for greater escapement and not be shifted to additional commercial fisheries.
- Retain existing policy to not allow fisheries to open until the post-run size update is reported.

- Avoid any changes to mainstem summer Chinook fisheries (i.e., increasing commercial, allowing gillnet or other non-selective fisheries), as these could negatively affect UC steelhead which migrate during those times.
- Maintain current recreational fishery allocations, as decreasing these could impact WDFW's ability to implement conservation fisheries, which are an important tool in adult management of hatchery fish.
- Complete development of the Columbia River Harvest Management Plan.

Chelan County looks forward to continuing to partner with the WDFW in working toward recovery of our ESA-listed salmonids. Please do not hesitate to contact Commissioner Bob Bugert at bob.bugert@co.chelan.wa.us any questions.

Sincerely,

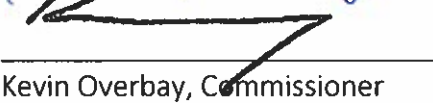
Board of Chelan County Commissioners



Doug England, Chairman



Bob Bugert, Commissioner



Kevin Overbay, Commissioner

From: [Commission \(DFW\)](#)
To: [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [Dave Graybill](#); [Donald McIsaac](#); [Anderson, James R \(DFW\)](#); [Larry Carpenter](#); [McBride, Tom A \(DFW\)](#); [Linville, Molly F \(DFW\)](#); [Thorburn, Kim M \(DFW\)](#)
Cc: [Dobler, Myrtice C \(DFW\)](#)
Subject: FW: Columbia River Gillnetting
Date: Thursday, July 2, 2020 7:44:35 AM

From: noelky@comcast.net <noelky@comcast.net>
Sent: Thursday, July 2, 2020 7:09 AM
To: Commission (DFW) <COMMISSION@dfw.wa.gov>
Subject: Columbia River Gillnetting

Just wanted to send a quick note to let you know the extreme dissatisfaction being felt by a local fisherman. The idea of getting gill nets out of the Columbia makes so much sense on so many levels I don't see how you could justify going backwards on this. Thank you for taking time to read and consider this. Please know people are paying attention to this matter and it's impact on our already endangered fish runs.

Thanks,

Michael Noel

[253-266-1117](tel:253-266-1117)

Sent from my T-Mobile 4G LTE device

From: [Commission \(DFW\)](#)
To: [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [Dave Graybill](#); [Donald McIsaac](#); [Anderson, James R \(DFW\)](#); [Larry Carpenter](#); [McBride, Tom A \(DFW\)](#); [Linville, Molly F \(DFW\)](#); [Thorburn, Kim M \(DFW\)](#)
Cc: [Dobler, Myrtice C \(DFW\)](#)
Subject: FW: WDFW's proposed continuation of a Gill Net Fishery on the Columbia is wrongheaded.
Date: Monday, July 6, 2020 6:55:36 AM

-----Original Message-----

From: Joseph Vaughan <josephvaughan9@gmail.com>
Sent: Friday, July 3, 2020 2:31 PM
To: Commission (DFW) <COMMISSION@dfw.wa.gov>
Subject: WDFW's proposed continuation of a Gill Net Fishery on the Columbia is wrongheaded.

Dear WDFW Commissioners,

I am an environmental scientist and recreational fisherman who has been following the story of WDFW decisions on management of anadromous fish, particularly those of the Columbia and Snake rivers.

Continuing Gill Net seasons on the Columbia is a WRONGHEADED policy that trivializes our responsibility to conserve the genetics of the surviving runs, already much diminished below their historical levels.

I participated in a Public Comment forum on Gill Nets on the Columbia, and I heard many experienced fisherman deplore WDFW's failure of leadership in proposing further Gill Netting.
I personally deplore WDFW's reneging on a prior commitment to get gill nets out of the Columbia.

Public participation is important to the future of our fisheries. Thank you for allowing me the opportunity to comment on the proposed changes to the Columbia River policy.

Increased gillnetting in the mainstem of the Columbia River is not the answer to saving our imperiled salmon and steelhead. Gill nets are significantly less capable of harvesting hatchery fish while releasing wild fish than other more selective methods. Perhaps more importantly, gill nets also encounter, snare and kill a wide variety of non-target species including steelhead, sockeye, birds and other wildlife.

Gill nets are not the answer. Please adhere to the initial key tenets of the policy and mandate the removal of gill nets from the lower mainstem Columbia River.

Sincerely,

Joseph Vaughan
148 SE Water St
Pullman, WA 99163
josephvaughan9@gmail.com

From: [Lothrop, Ryan L \(DFW\)](#)
To: [Dobler, Myrtice C \(DFW\)](#)
Subject: FW: Fisheries policies
Date: Thursday, July 9, 2020 9:54:43 AM

For the commenting record.

Ryan Lothrop
Washington Dept. of Fish and Wildlife

From: Commission (DFW) <COMMISSION@dfw.wa.gov>
Sent: Monday, July 6, 2020 6:54 AM
To: Barbara Baker <bbakerwdfw@gmail.com>; Bob Kehoe <rfk@psvoa.org>; Brad Smith <bradley.smith@wwwu.edu>; Dave Graybill <fishboy@nwi.net>; Donald McIsaac <donald.mcisaac@dma-consulting.net>; Anderson, James R (DFW) <James.Anderson@dfw.wa.gov>; Larry Carpenter <lc3896@gmail.com>; McBride, Tom A (DFW) <Tom.McBride@dfw.wa.gov>; Linville, Molly F (DFW) <Molly.Linville@dfw.wa.gov>; Thorburn, Kim M (DFW) <Kim.Thorburn@dfw.wa.gov>
Cc: Davis, Jeffrey P (DFW) <Jeffrey.Davis@dfw.wa.gov>; Geddis, Robert B (DFW) <Robert.Geddis@dfw.wa.gov>; Windrope, Amy (DFW) <Amy.Windrope@dfw.wa.gov>; Susewind, Kelly (DFW) <Kelly.Susewind@dfw.wa.gov>; Warren, Ron R (DFW) <Ron.Warren@dfw.wa.gov>; Lothrop, Ryan L (DFW) <Ryan.Lothrop@dfw.wa.gov>; Tweit, William M (DFW) <William.Tweit@dfw.wa.gov>
Subject: FW: Fisheries policies

From: Doug Baldwin <dougbaldwin318@gmail.com>
Sent: Friday, July 3, 2020 1:29 PM
To: Commission (DFW) <COMMISSION@dfw.wa.gov>
Cc: Austin, JT (GOV) <jt.austin@gov.wa.gov>
Subject: Fisheries policies

Two weeks ago WDFW released a draft strategic plan that sounded like genuine fisheries management.

- Proactively address conservation challenges,
- Build passionate constituencies through community engagement,
- Connect people to nature and conservation through recreation and stewardship,
- Deliver science that informs Washington's most pressing fish and wildlife questions,
- Move WDFW toward operational and environmental excellence.

Excellent! Thank you...

Then last week...WDFW announce a proposed policy that would restore year-round mainstem gillnetting to the LCR?

Dissolve the C3620 that so many thousands of people have devoted thousands of hours to?
Unanimously supported by the commission when proposed in 2012 then adopted in 2013?

It seems inconcievable to me that these diametrically opposed statements can come from the same commission in back to back weeks. Flip-flop? Dopplegangers? Or just toadies to the commercial fishing interests? I can't figure this out...

Doug Baldwin, Pullman, Wa

From: [Commission \(DFW\)](#)
To: [Dobler, Myrtice C \(DFW\)](#)
Subject: FW: WDFW's proposed continuation of a Gill Net Fishery on the Columbia is wrongheaded.
Date: Monday, July 6, 2020 6:56:12 AM

-----Original Message-----

From: Joseph Vaughan <josephvaughan9@gmail.com>
Sent: Friday, July 3, 2020 2:31 PM
To: Commission (DFW) <COMMISSION@dfw.wa.gov>
Subject: WDFW's proposed continuation of a Gill Net Fishery on the Columbia is wrongheaded.

Dear WDFW Commissioners,

I am an environmental scientist and recreational fisherman who has been following the story of WDFW decisions on management of anadromous fish, particularly those of the Columbia and Snake rivers.

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Sincerely,

Joseph Vaughan
148 SE Water St
Pullman, WA 99163
josephvaughan9@gmail.com

DAN SUTTON
1ST DISTRICT

KYLE STEINBURG
2ND DISTRICT

MARC S. STRAUB
3RD DISTRICT

DOUGLAS COUNTY COMMISSIONERS

July 6, 2020

Washington Dept. of Fish and Wildlife Commission
Attn: Chairman Carpenter
PO Box 43200
Olympia, WA 98504-3200

Dear Chairman Carpenter,

The Douglas County Board of Commissioners is submitting this letter in regard to the pending harvest recommendations of the WDFW Columbia River Fishery Policy Workgroup.

Immense sacrifices have been made by landowners in the Upper Columbia (UC) region to support habitat restoration for the benefit of ESA-listed spring Chinook (endangered) and steelhead (threatened). In the past 20 years, over 500 habitat projects have been implemented to support recovery, primarily on private lands. In turn, harvest management is intended, in part, to allow more fish to return to natal spawning grounds for both conservation and fisheries. Integration of habitat and harvest (as well as the other H's) will be necessary if we are to recovery our ESA-listed salmonids. UC spring Chinook are of great conservation risk, as they are the weakest populations of the Upriver spring Chinook stock.

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- Maintain current recreational fishery allocations, as decreasing these could impact WDFW's ability to implement conservation fisheries, which are an important tool in adult management of hatchery fish.
- Complete development of the Columbia River Harvest Management Plan.


The Board looks forward to continuing to partner with the WDFW in working toward recovery of our ESA-listed salmonids. Please do not hesitate to contact Commissioner Marc Straub at mstraub@co.douglas.wa.us 509-745-8537 with any questions. Thank you.

Sincerely,


Douglas County Board of Commissioners



Dan Sutton, Chair



Marc S. Straub, Vice
Chair



Kyle Steinburg,
Member

From: [Commission \(DFW\)](#)
To: [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [Dave Graybill](#); [Donald McIsaac](#); [Anderson, James R \(DFW\)](#); [Larry Carpenter](#); [McBride, Tom A \(DFW\)](#); [Linville, Molly F \(DFW\)](#); [Thorburn, Kim M \(DFW\)](#)
Cc: [Dobler, Myrtice C \(DFW\)](#); [Lothrop, Ryan L \(DFW\)](#)
Subject: FW: A Senior Columbia River Biologist Recommendations on Columbia River fisheries
Date: Monday, July 13, 2020 8:54:56 AM

-----Original Message-----

From: Dennis Schwartz <schwade@comcast.net>
Sent: Friday, July 10, 2020 10:11 AM
To: Commission (DFW) <COMMISSION@dfw.wa.gov>
Subject: A Senior Columbia River Biologist Recommendations on Columbia River fisheries

Dear WDFW Commissioners,

WDFW Commissioner's & Mr JT Austin,

I wanted to give the Commission staff and Mr. Austin my professional opinion as to the proposed roll back of some key aspects of the policy for the Columbia River Fisheries moving forward. I was a senior fish biologist with the USACE for 23 years working exclusively on improving the survival of migrating juvenile and adult salmonids at many of the lower Columbia and Snake River dams. The Corps along with the support of BPA, other Fed agencies, the states and Tribes made huge increases to the survival of juveniles passing a hydro project but also made major improvements for upstream adult passage. It was a passion to developing the best facilities to pass these critical resources that our region continues to spend billions of dollars protecting and managing. Throughout my career I have educated myself on what have been some of the greatest detriment to our fish runs and what practices have the greatest impact on the resource. Of course even before Bonneville Dam was constructed on the river in the mid 1930's the greatest loss of fish on the Columbia were hinges on two harvest methods. Gillnetting and fishwheels. The regional managers even in the early 1900's saw and recognized how these incredibly intrusive harvest methods need to be taken off the river to allow more fish to make it to spawning grounds. I know that the dams have taken their toll and I'm not downplaying their impacts. What I am sure of is that the region has forced the Fed Dam operators on the Columbia and Snake Rivers to improve their systems to have better survival. In fact, millions of dollars of lost generation is absorbed to provide more spill to speed up the river to get juveniles to the estuary faster. So what have the region done to force bad practices such as non discriminate gillnetting on this resource?? Gillnets are the same killing machines as they have been for centuries. Don't tell me that tangle nets are an acceptable practice either. I have overseen thousands of adult salmon handling activities for research and the stress of handling fish is bad even in the best of controlled conditions. Now take those same fish and put them through a gill or tangle net. True gillnets kill. So called less stressful tangle nets are a joke and regional managers know they kill just as many fish. If the region is going to say that a fish hooked by recreational sportsmen on the Columbia with barbless hook is an incidental take when released then so should every fish taken by a tangle Gill net. Gill and tangle nets kill everything including listed steelhead and sturgeon.

The fish managers know that certain practices needed to be done away with on the Columbia and Snake Rivers because they're use was to extreme and killed too many salmon to allow there use. We mandated fishwheel owners to stop this practice even though they had some type of grandfathered permit to do this. The feds just said got to stop and that was that! No wrangling for shorter seasons or smaller catches. It was ordered. We also hear that gillnetting needs to continue because livelihoods and families will be effected. I contend that not one if the gillnet permit holders relies on this fishery as their first line of income. In fact if it were made transparent to public we would see that many if the netters have lucrative fishing businesses in Alaska and offshore like crabbing and tuna. I also know that others have state paid jobs like firefighters and other jobs that support a family. We hear from them that if they can't fish the Columbia their families will be impacted. Well I agree but the impacts of what harm they bring to the resource for such a small group that brings a very small economic benefit has to be viewed with real facts. It's a known fact that the economics of what the recreational sportsman bring to the NW overshadows the dismal benefits that they're practices brings.

Bottom line is that history, biological science, known best practices all drive towards facts that gillnetting and the use of them on the lower Columbia main stem need to be done away with for good. There is no science showing that recovery of the salmon, steelhead and sturgeon resource can be brought back to stable numbers until you remove gillnets. It's also obvious to us professionals that have worked in the region for decades that the commercial fishing lobbyists in Seattle continue to funnel millions of dollars into the gillnetting distraction knowing that if the gillnetters are taken off the Columbia, then they are now fully exposed to be next on the list of reforms. There does need to be an end date for removing gillnetting on the lower Columbia. It should have been way before now and history shows that if we continue with this bad practice then we'll reap the consequences of bad management of this precious resource.

Thank you for allowing the public to comment on the draft Columbia River policy recently released by the Commission. I strongly oppose the proposed draft policy.

Nearly eight years ago, a bi-state compromise plan was developed to improve the selectivity of Columbia River fisheries, including transitioning gill net fisheries out of the mainstem lower Columbia River. An extensive review of this policy, conducted by WDFW staff, concluded that the basic architecture of the plan was solid but there were flaws with the agency's implementation.

Instead of going backward on the intent of the plan as proposed by this draft policy, I strongly urge you to use this opportunity to get the plan back on track and fulfill the intended promise - to mandate the adoption of selective fishing practices and remove gill nets from the lower mainstem Columbia River.

Sincerely,

Dennis Schwartz
14312 SE 22nd Cir
Vancouver, WA 98683
schwade@comcast.net

From: [Kloepfer, Nichole D \(DFW\)](#)
To: [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [Dave Graybill](#); [Donald McIsaac](#); [Anderson, James R \(DFW\)](#); [Larry Carpenter](#); [McBride, Tom A \(DFW\)](#); [Linville, Molly F \(DFW\)](#); [Thorburn, Kim M \(DFW\)](#)
Cc: [Susewind, Kelly \(DFW\)](#); [Director \(DFW\)](#); [Lothrop, Ryan L \(DFW\)](#); [Dobler, Myrtice C \(DFW\)](#)
Subject: FW: Letters to legislators regarding Columbia River policy review and possible revisions
Date: Monday, July 13, 2020 3:38:18 PM
Attachments: [2020-7-9 Policy Letter for Takko and Blake.docx](#)
[2020-7-8 Policy Process review letter to legislators and Commission, shortened.docx](#)

From: Robert Sudar <fallcreek734@gmail.com>
Sent: Monday, July 13, 2020 2:22 PM
To: Kloepfer, Nichole D (DFW) <Nichole.Kloepfer@dfw.wa.gov>
Subject: Letters to legislators regarding Columbia River policy review and possible revisions

Nikki: I sent the two attached documents to Senator Takko and Representative Blake today, and also to JT Austin. Please share them with the F&W Commission, the Director and appropriate staff. Thank you.

Robert Sudar

June 12, 2020

To: Senator Dean Takko and Representative Brian Blake

From: Robert Sudar

Re: Columbia River Salmon Management Review and Revision

Sen. Takko and Rep. Blake:

I have attached for you an Eight Year Review of the Columbia River Salmon Management Policy C-3620 and the Washington Fish and Wildlife Commission's lack of progress in dealing with the serious shortcomings of that Policy. I was part of the original advisory group and have been involved throughout this entire process. I've spent a lot of time looking at old documents and emails to make this eight-year review as factual as possible. It has been both frustrating and depressing.

I checked the summary of the September, 2012 work group meeting by moderator Paul de Morgan and found this outline of the parameters of the Adaptive Management feature upon which much of the Policy depended to make it work:

d. Management of non-tribal fisheries will be adaptive and adjustments may be made if certain triggers occur (e.g. modify how fish are shared among fisheries and how mainstem fisheries are managed).

These triggers for adaptive management may include:

- 1) Significantly lower than expected returns of harvestable fish to off-channel sites.
- 2) Insufficient space within off-channel sites to accommodate the commercial fleet.
- 3) Significantly lower than expected catches using selective gears.
- 4) Biological, fiscal or legal circumstances that delay or preclude implementation of alternative gear and additional off-channel hatchery investments.
- 5) Significantly lower than expected economic return to commercial fishers.
- 6) Conflicts with terms of U.S. v Oregon management agreements with Tribes.
- 7) Failure to meet conservation needs, e.g. reducing the proportion of hatchery fish on spawning grounds.

Nearly every one of these triggers for changing the Policy has occurred and is enumerated in the Staff Evaluation of the policy in 2018. However, there continues to be disagreement within the F&W Commission about the Policy and this review process. One opinion is that the original Policy was valid, there was just a failure by staff to fully implement it. Rather, it is the Commission that has completely failed to implement their Adaptive Management strategy to deal with any of those triggers. The easiest step – the transfer of harvest allocation from the commercial fishery to the recreational fishery – took place as envisioned. None of the consequences of that action on the commercial fishery has been addressed to date, despite the demonstrably negative effects it has had on the commercial fishery.

Salmon management on the Columbia is critical to more than just recreational and commercial harvest opportunity on the river. Columbia River salmon are important to ocean fisheries, to sharing

agreements with British Columbia and Alaska, and to tribal treaty obligations within the river. In fact, in the moderator's minutes of that same September 2012 workgroup meeting, it was noted that Kathryn Brigham of the Columbia River Intertribal Fish Commission (CRITFC) and Mike Grayum of the Northwest Indian Fish Commission (NWIFC) made the following comments in regards to the proposed changes in Columbia River salmon management:

- ☒ This effort is about allocation only and distracts from the more important effort to increase abundance, including hatchery production
- ☒ There are many unknowns and uncertainties around selective fisheries and we do not support it
- ☒ Salmon are among the tribes First Foods and are of great importance
- ☒ There is also concern about impacts to ocean fisheries – lower Columbia River fish contribute to ocean and Alaska fisheries
- ☒ Gillnets are not a cause of decline – the issue at stake here is just allocation
- ☒ Attention is needed to all the “H’s” (Habitat, Hatcheries, Harvest, Hydropower) – but habitat is key and will have a real effect on conservation

These tribal concerns were ignored, too, in the eagerness to revise Columbia River salmon management in 2012. In contrast, the Harvest Reform process currently underway has shown great promise, in that a science-based, data-driven document is now available for public review, which is encouraging. However, in its June 26 telephone meeting, the Commission Chair set aside the vote on the harvest reforms scheduled for the Commission meeting at the end of July, and no actual vote date was given to replace it, just vague comments that it would be ok to get it done by the end of the year.

Clearly, as demonstrated in my attached history of this Policy, there was a rush to implement the policy in 2012 and a rush to advance it without considering the adaptive management provisions in 2017, with inadequate public review and considerable behind-the-scenes activity that the commercial fleet was not privy to. There is currently a continued reluctance to make revisions based on a variety of Policy shortfalls exposed through the staff review and continual comprehensive testimony from commercial fishers who have been unfairly harmed by Policy C-3620.

I know that you are familiar with these issues and thank you for your past involvement. I want to see meaningful Policy revisions completed and voted on by the Commission no later than this September. A Policy that is based on science, instead of politics, and has solid backing within the Washington Commission will act as motivation for Oregon to re-engage with this process and bring about a joint Policy that will truly be good for both commercial and recreational fisheries. Eight years of this kind of inaction and treatment of the commercial fishing fleet and rural fishing communities are more than enough. I would appreciate your support in bringing this issue to a timely vote of the Commission, again no later than September.

A Review of Columbia River Salmon Management and Harvest Allocation Process, 2012-2020

The F&W Commission has been slowly working towards an update of the Columbia River Salmon Management Policy C-3620. Since its inception in 2012, there are now eight years of data available to consider when deciding whether the Policy has met its initial goals, and what changes might be reasonable. There was an update approved in 2017, but it was based more on the original Policy timeline than on the Policy performance from 2012-2016. The current revisions are based on a comprehensive review done by WDFW staff in 2018. The review process was originally a joint workgroup with the Oregon F&W Commission, but after an almost total change in their commissioners in 2019, Oregon chose to suspend their involvement. Since then Washington has continued with the review but has maintained the same principles established when both states were involved.

There continues to be disagreement about the Policy and this review process. One opinion is that the original Policy was valid, there was just a failure by staff to fully implement it. The easiest step – the transfer of harvest allocation from the commercial fishery to the recreational fishery – took place as envisioned. There were many other “promises” in the Policy. None of those promises have been achieved. All of these issues are what the review showed, and are the reason the Washington Commission has been continuing to consider Policy revisions, as promised under the Adaptive Management provisions of Policy C-3620, with or without Oregon’s involvement at this time.

The Commission schedule had included a vote on the Policy revisions at its upcoming July meeting, but some Commissioners have pushed for a delay, citing a lack of time for public testimony since the revised Policy was officially released in mid-June, the difficulty of holding meetings during the COVID-19 quarantine, and the lack of recent Oregon involvement. The following is a look into the validity of these suggested reasons for a delay in light of the history of the Policy process since 2012, and how public and Oregon input was included.

Policy process in 2012

I was surprised after former Oregon Governor Kitzhaber’s 2012 proposal for a radical change in Columbia River salmon management. Wouldn’t the Washington F&W Commission want to hold a public hearing to discuss the proposal and what impacts it would have on Washington residents, businesses and the state economy, and take public testimony? Instead, the two Directors met and agreed to hold joint work group meetings to implement Kitzhaber’s ideas. In essence, our Commission let Oregon determine salmon policy for Washington.

The first work group meeting, on September 21st 2012, was mostly about asking questions and then directing staff to provide answers by the next meeting.

The second work group meeting was in October of 2012. Early in the meeting, the Washington Commissioners laid out a complete framework of their vision for a future policy – roughly 40 pages. It drew on joint staff work between the two states, but was more comprehensive. It was not the result of any public process, at least nothing that the commercial members of the work group were involved in.

Both states held public hearings on the proposed policy in early November, 2012, but changes due to a NMFS and HSRG review were being made at the same time the public was testifying on a prior version.

The final work group meeting was in November. Work group members received a revised copy of the future policy about three days before the meeting, along with an economic “model” that contained several commercial fishery income components that were simply listed as “undetermined at this time.” There was public testimony but the policy, as presented, was approved by the six Commissioners.

The Oregon Commission passed the Policy in December 2012 after a contentious public hearing that didn’t conclude until around 7PM.

Washington held its policy approval hearing in January of 2013. Again, there were major revisions to the wording of the final document that were not made available until, in this case, the day of the hearing. The Washington Chairwoman said that they had already heard a lot of public testimony so there would be a limit on the number of citizens allowed to testify. Each of the Commissioners commented on the Policy before the vote was taken and each mentioned Adaptive Management as the proper method for making any necessary changes in the future.

Fall 2016/Winter 2017

The 2012 Policy called for four “transition” years followed by an update of the Policy for the long term. The three Washington Fish Committee members met with three members of the Oregon Commission in a non-public meeting in the fall of 2016 to discuss possible future sport/commercial allocation sharing for spring, summer and fall Chinook, along with coho and sockeye. Several approaches were considered but there was no consensus reached between the two groups. Each state held a public hearing, with public testimony, in the fall, too, but there was no updated Policy to review.

The Washington Commission met in early January, 2017, to vote on a Policy update. There was still no updated Policy available for the public to review. One Commissioner said during the hearing that the updated Policy was finally completed that morning, during breakfast. There was a motion and a second to accept the new Policy before a staff member finally presented the basics of the revised Policy in a Powerpoint presentation to the Commission. It was approved, though not unanimously.

Oregon held their hearing on the updated Policy the next week. They approved an update that moved some of the allocation back to the commercial fleet, along with more liberal allowances for acceptable gear. Their Policy was not in alignment with Washington’s. The Oregon Governor told her Commission to meet again and conform to the Washington version. There was no effort to have the two states meet and forge a compromise. The Oregon Commission met again in March of 2017 and approved enough changes to allow the Oregon and Washington versions to provide for joint management of salmon.

November 2018

There continued to be concerns voiced in both states in regards to the Policy and whether or not it was meeting its stated goals and promises. Washington staff did a comprehensive review of the Policy, at the direction of the Commission, between January and October of 2018. There were several presentations to the Washington Fish Committee (which was now holding public meetings) as the review progressed. In November of that year the two states held a joint Commission meeting to discuss the Columbia River Policy, and agreed to form a joint Policy Review Committee (PRC), comprised of three Commissioners from each state, to review the current Policy and propose any necessary changes to their full Commissions.

2019

The joint PRC held three meetings in January and February of 2019, and developed websites for the public to follow the documents for each meeting, discussion topics, policy revisions, and in some cases to even watch a video of the meetings. Public testimony was also allowed. They agreed at their February 26th hearing to a revised Policy for 2019 and *“good faith progress towards recommending a comprehensive Columbia River salmon fishery policy for 2020 and beyond, to be completed as soon as possible”* that they would eventually present for approval to their full Commissions. Washington approved the 2019 changes at their March meeting in Spokane, but the Oregon Governor told her Commission that she did not want them voting on it while her legislature was in session.

The members continued to meet, however, with another public meeting in March, two in August and a fourth in October. The meeting scheduled for November 2019, however, when a final agreement for a long term Policy revision was supposed to be reached, was cancelled when Oregon, with five new members on the seven-person Commission and the resignation of a sixth, requested that the meeting be postponed because of a lack of background amongst the new members on the overall issue.

2020

The Washington Commission agreed in December 2019 to have its PRC members continue meeting, with a goal of finalizing any Policy revisions and bringing them to the full Commission for a vote. A schedule was established with a series of planned meetings on both sides of the state. In the meantime, Oregon’s Commission Chairwoman decided to pull out of the process for the time being. A letter was then sent to the Oregon Commission notifying them of Washington’s plan to continue the discussions and offering to include them if they so desired. Five potential meetings were scheduled, with a planned final decision at the June Commission meeting in Yakima. The Covid-19 pandemic intervened and changed some aspects of the schedule, but the Washington review group did hold public phone meetings, with public testimony, in March, May and June, at which time a proposed revised Policy was voted on for presentation to the full Commission at their June meeting.

The full Commission voted to distribute the Washington Columbia River Policy Workgroup’s revised Policy at their June meeting, with a scheduled public hearing in late July. However, at their phone conference call in late June, there was a lot of discussion amongst the Commissioners about whether the process was too rushed, whether there was adequate public testimony and whether Oregon needed to join the discussion before a vote, among other concerns. Though no decision was made, it appeared that no vote would occur before at least September since the Chairman sets the schedule and he was opposed to a July decision.

Looking Back and Looking Ahead

The irony in all of this is striking to me. In 2012, those of us who were commercial advisors for the work group received little information to consider before the September 21st meeting. We received a little information three days before the October 18th meeting, and most of it the day before. The 40+ page presentation from the Washington Commissioners was not included in those documents. It was a similar situation for the final meeting, in November. Those of us who were advisors began receiving information the weekend before, and some information the day before the meeting. Meetings were

held between staff and Commissioners to formulate a new Policy outside of the work group meetings but none were open to work group members or to the public.

The same situation was true for the 2017 Policy updates. No opportunity at all to review the proposal before the staff presentation, which occurred after the public testimony. In fact, we didn't receive a copy of the revisions until several weeks after the meeting.

Contrast this with the Policy Review process by staff and the work of the Policy Review Committee, both with and without Oregon's involvement. Public meetings with sport and commercial advisory groups, the Commission and the Fish Committee during the review, followed by a joint Commission meeting with Oregon. Seven public meetings in 2019, along with updates at Commission meetings. Clear scheduling of proposed meetings, hearings and potential decisions. The options for a future Policy were laid out in a table and the discussion and winnowing of those options was done in a public forum. When Oregon stepped back from the working group, the Washington members continued the public process, took public testimony and worked at reducing the array of Policy options openly, on a posted schedule.

No one on the Commissions in 2012 seemed concerned by the pace of the Policy development. In fact, there was an initial suggestion of the need for a fourth meeting in December of that year, but it never occurred. The Chairwoman at the January Washington meeting put a limit on the number of testifiers because she said the Commission had already heard enough testimony and she doubted there was anything new to hear. But one is given the impression now that somehow that process was OK and a positive step forward for Columbia River salmon management, but the current long, public Policy review process and possible revisions has been too rushed and not allowed enough public input.

This summary is the result of a review of documents and emails received by work group members during the 2012 policy process. It also draws on other materials developed for various meetings and presentations since then, in order to make this eight-year review as factual as possible. There was a clear rush to implement in 2012, a rush to advance in 2017, and a continual reluctance now to make revisions based on a variety of Policy shortfalls exposed through the staff review and continual comprehensive testimony from commercial fishers who have been unfairly harmed by Policy C-3620. In fact, some Commissioners have said that a decision by the end of 2020 would be an OK goal. That is not an ok goal for those of us who have been struggling to maintain our businesses during the last eight years, providing local salmon to the non-fishing public in the Northwest. We hope that you will acknowledge and recognize our frustrations and the need for meaningful Policy revisions by the Commission no later than this September.

Submitted by Robert Sudar, July 2020

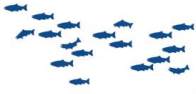
Columbia River Commercial Advisor & 2012 Policy Work Group Member

From: [Commission \(DFW\)](#)
To: [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [Dave Graybill](#); [Donald McIsaac](#); [Anderson, James R \(DFW\)](#); [Larry Carpenter](#); [McBride, Tom A \(DFW\)](#); [Linville, Molly F \(DFW\)](#); [Thorburn, Kim M \(DFW\)](#)
Cc: [Dobler, Myrtice C \(DFW\)](#)
Subject: FW: Contact the Commission: Other
Date: Tuesday, July 14, 2020 3:00:24 PM
Attachments: [WFWC_policy_C_-_3620_Revision_17_July_2020_Final.pdf](#)

From: Dale Beasley <crabby@bakerbay.org>
Sent: Tuesday, July 14, 2020 12:59 PM
To: Commission (DFW) <COMMISSION@dfw.wa.gov>
Subject: Contact the Commission: Other

Name	Dale Beasley
Email	crabby@bakerbay.org
Address	1189 Spruce St E Ilwaco WA 98624
Subject	Other
Message	<p>Dear Commissioner</p> <p>Please Raise Moe Salmon for harvest with No Fisherman left behind as good public policy creating JOBS in our Fish Dependent Communities that have been econmcally depressed due to the existing C -3620 Columbia River Salmon policy. WDFW has stopped raising approxiamtly 75 million salmon in our state hatcheries West of Bonneville Dam that has been excrusiatingly painful to fishing. Plese reread RCW 77.04.012 that not only mandates salmonconservation but also enhancement of both commrcial and recreational fisherie - C - 3620 needs erious revision to meet that portion of the Legislative Mandate.</p> <p>Dale Beasley, president of CCF and CRCFA representing fishermen since 1979</p>
Attachment	https://www.123formbuilder.com/upload_dld.php?fileid=f90da6b1e92afc2b26a16afc03d6e4a8

The message has been sent from 71.85.42.88 (United States) at 2020-07-14 15:58:56 on Chrome 83.0.4103.116
Entry ID: 2265



Washington Fish and Wildlife Commission
600 Capitol Way N.
Olympia, WA 98501

July 17, 2020.

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Organizations

*American Albacore
Fishermen Association*

*Bandon Submarine
Cable Council*

*Columbia River Crab
Fisherman's Association*

*Fishing Vessel Owner
Association*

*Grays Harbor Gillnetter's
Association*

Ilwaco Charter Association

*Puget Sound Crab
Association*

*Purse Seine Vessels Owners
Association*

Salmon For All

*Washington Dungeness
Crab Fishermen's Assoc.*

*Washington Trollers
Association*

*Western Fishboat Owners
Association*

*Westport Charterboat
Association*

*Willapa Harbor Gillnetter's
Association*

*Willapa-Grays Harbor
Oyster Growers Assoc.*

Supporting Members

*Bell Buoy Crab Company
Englund Marine Supply*

*Masco Petroleum
Ocean Companies*

*Port of Grays Harbor
Port of Ilwaco*

*WeFish
West Coast Seafood*

*Processors Association
Westport Charters*

Westport Seafood

Washington Fish and Wildlife Commission:

RE: Please Advance WFWC Policy C – 3620 without delay

The Coastal Coalition of Fisheries is an association of fishermen’s, shellfish growers’ and processors’ organizations and affiliates located on the Washington and Oregon coast and Puget Sound. Our membership represents sport and commercial fishing organizations, shellfish growers, and other multiple species and gear types. We are requesting that the Washington Fish and Wildlife Commission expedite passage of its reforms for the Columbia River Harvest Policy C-3620.

We also hope that this action will lead to meaningful review and revision of the Willapa Bay and Grays Harbor policies. These policies have failed, as demonstrated by WDFW’s own staff documents, such as the Nov. 2018 Comprehensive Evaluation of the Columbia River Basin Salmon Management Policy C-3620, 2013-2017. During the 8-years duration of the policy, the coastal and Columbia River gillnet fleets and their communities have suffered the loss of a mainstay of their local economies, as the Department’s own numbers confirm.

Although the Commission authorized the Columbia River Policy Workgroup to work on reforms, and both Oregon and Washington commissioners formed that work group, Oregon withdrew from that process in early 2020 The Washington Commission voted to continue. We would like to commend the Washington Commission for its foresight and diligence in this regard and support their work. However, that process has now been delayed due to a decision by the Washington Chair, in response to a phone call from the Oregon Chair. We see no reason why Washington should postpone its public process. Oregon pulled out of the original process, and still has not re-joined. The Oregon Commission agendas for the rest of 2020 show nothing to date that indicates the Commission plans to discuss or review the Policy. We believe that the Washington Commission should set a higher standard for fisheries conflict resolution, fisheries policy revision, and fisheries management, particularly as the Policy mandated adaptive management. We also believe the Commission should defend its own state’s commercial fleets. The Department’s economic figures demonstrate that the commercial fishers were the ones whose incomes have been most adversely affected. There is no good reason to prolong this situation.

We want to see the Commission fulfill the Department’s legislative mandate to “promote orderly fisheries and... enhance and improve recreational and commercial fishing in this state.” All coastal fishing communities are watching this process. We know what happens to one of our members can happen to the others. Salmon fishing is a seasonal occupation; once the fish have gone by, the fishing opportunity is over. This fact is why time is of the essence in fisheries management. This process has gone on far too long as it is. We are hearing worrisome reports of salmon catches so far in Alaska. The Department is also working on disaster relief funding

for prior fishing years, as well as Covid-19 relief. If ever there were a time for the Commission to take seriously their mandate of enhancing and improving their fisheries, it is now. We urge the Commission to expedite this decision to stabilize and create more viable fisheries in Washington.

Sincerely,

Dale Beasley,
President

Cc: Kelly Susewind, Director, Washington Fish and Wildlife

J.T. Austin

Rep. Brian Blake

Rep. Jim Walsh

Sen. Dean Takko