



## ***Columbia River Salmon Fishery Policy Workgroup (CRW)***

### **Public Comments received between August 31, 2020 through September 8, 2020**

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

**From:** [Lothrop, Ryan L \(DFW\)](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** FW: Columbia River Policy letter from Puget Sound Anglers State Board  
**Date:** Tuesday, September 1, 2020 5:26:28 PM  
**Attachments:** [PSA letter to WDFW CommissionCR policy.pdf](#)  
[Barry Thom Letter e1 att1 dec2016ltr mitchellact mar2017bb.pdf](#)

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Did this make it in the comments, if not, can you include it?

Ryan Lothrop  
Washington Dept. of Fish and Wildlife

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**From:** Tweit, William M (DFW) <William.Tweit@dfw.wa.gov>  
**Sent:** Monday, August 31, 2020 3:24 PM  
**To:** Lothrop, Ryan L (DFW) <Ryan.Lothrop@dfw.wa.gov>; Warren, Ron R (DFW) <Ron.Warren@dfw.wa.gov>; Cunningham, Kelly J (DFW) <Kelly.Cunningham@dfw.wa.gov>  
**Subject:** FW: Columbia River Policy letter from Puget Sound Anglers State Board

FYI, Bill

**From:** barbara baker <[bbakerwdfw@gmail.com](mailto:bbakerwdfw@gmail.com)>  
**Sent:** Monday, August 31, 2020 2:59 PM  
**To:** Tweit, William M (DFW) <[William.Tweit@dfw.wa.gov](mailto:William.Tweit@dfw.wa.gov)>  
**Subject:** Fwd: Columbia River Policy letter from Puget Sound Anglers State Board

----- Forwarded message -----

From: <[rgarner755@aol.com](mailto:rgarner755@aol.com)>  
Date: Mon, Aug 31, 2020, 1:24 PM  
Subject: Columbia River Policy letter from Puget Sound Anglers State Board  
To: [bbakerwdfw@gmail.com](mailto:bbakerwdfw@gmail.com) <[bbakerwdfw@gmail.com](mailto:bbakerwdfw@gmail.com)>, [kvranchinc@gmail.com](mailto:kvranchinc@gmail.com) <[kvranchinc@gmail.com](mailto:kvranchinc@gmail.com)>, [jamesranderson1969@gmail.com](mailto:jamesranderson1969@gmail.com) <[jamesranderson1969@gmail.com](mailto:jamesranderson1969@gmail.com)>, [rfk@psvoa.org](mailto:rfk@psvoa.org) <[rfk@psvoa.org](mailto:rfk@psvoa.org)>, [donald.mcisaac@dma-consulting.net](mailto:donald.mcisaac@dma-consulting.net) <[donald.mcisaac@dma-consulting.net](mailto:donald.mcisaac@dma-consulting.net)>, [kim.thorburn@dfw.wa.gov](mailto:kim.thorburn@dfw.wa.gov) <[kim.thorburn@dfw.wa.gov](mailto:kim.thorburn@dfw.wa.gov)>  
Cc: [coho@willapabay.org](mailto:coho@willapabay.org) <[coho@willapabay.org](mailto:coho@willapabay.org)>, [lisaw@lummi-nsn.gov](mailto:lisaw@lummi-nsn.gov) <[lisaw@lummi-nsn.gov](mailto:lisaw@lummi-nsn.gov)>, [pfrank@salmondefense.org](mailto:pfrank@salmondefense.org) <[pfrank@salmondefense.org](mailto:pfrank@salmondefense.org)>, [dlekanoff@gmail.com](mailto:dlekanoff@gmail.com) <[dlekanoff@gmail.com](mailto:dlekanoff@gmail.com)>

WDFW Commissioners

Please accepted our PSA attached letter on the Columbia River. Also attached is a letter from Barry Thom verifying our reasoning.

Any questions, please do not hesitate to contact me.

Thank you

Ron Garner

President

Puget Sound Anglers

State Board



WDFW Commission  
Olympia, WA

August 31, 2020

Re: Columbia River Policy C-3620.

The Puget Sound Anglers State Board has been one of the biggest leaders for increasing salmon production for all in Washington State. We have been working with NOAA, PFMC, and WDFW as well as the Governor's office to bring back salmon in our wonderful state. We go right to the heart of the matter and have been successful in stopping unwarranted fishing closures in the San Juans, Western Washington Saltwater from Port Angeles East through Admiralty Inlet, Hood Canal, and down through the entire Puget Sound, and Pacific Northern Coast-keeping them open for fishing. All fishers benefitted from our hard work. These were all huge battles that PSA was successful in winning only because we engaged at the top levels to stop these from happening. The average person has no idea what reality is when we get to these levels and 9 times out of 10 have bad information. This is where the Puget Sound Anglers is a recognized recreational leader in Washington State keeping our families and their kids fishing. Today's problems are usually driven by misunderstanding the problem. The C-3620 Policy is not being realized what it really means.

First and foremost, the Washington State Columbia River Salmon Policy is not just about fishing inside the Columbia River. It is also about supplying fish to our West Coast salmon fisheries. Increased salmon production at the hatcheries means more fish for our ocean fisheries too. If the 70/30 policy change is not going to make much of a difference in the recreational catch in the Columbia River then we should look at the positive benefits in the ocean. The coastal communities are dwindling away due to loss of hatchery production. The Puget Sound Anglers State Board supports increased hatchery salmon production at all levels. With the 160 million chinook and coho annual production cuts from 1992-2016, we see this as the largest factor that has cut our fisheries. We want more fish and are working with our coastal communities, tribes, and commercials to bring back more fish for all. Large runs of missing salmon have an impact on all other fisheries as well as the SRKW orcas. The Lower Columbia River Kings, were a massive run that benefitted weaker strains of fish that could hide in the giant cloud of fish that went all of the way up through Alaska and back. It provided a large run of fish that were caught commercially and recreationally, allowing the weaker strains to not be as exposed to fishing and being eaten by predators. When we set ocean bottom fishing seasons such as rockfish, lack of available salmon, transfers more fishers to catch rockfish and other bottom fish, putting a larger impact on them.

Time and time again one of the most misunderstood facts or is not known in salmon production is a word called "pHOS." pHOS is the Proportion (or ratio) of Hatchery (salmon) fish on the Spawning grounds. This is what determines how many hatchery fish can be produced or not. If that ratio is too high, then hatchery production is cut immediately. If it is low, more hatchery fish can be produced. We would rather fish a smaller percentage of a much larger amount of fish than a larger percentage of less fish. For example, we would rather fish 70% of 150,000 fish than 80% of 50,000 fish.

PSA has been an advocate to make more fish/make the pie bigger for everyone. I have had numerous talks with NOAA's West Coast Regional Administrator, Barry Thom, on how to make more hatchery salmon production in today's world of ESA. We discussed finding dead end bays with no rivers behind them so hatchery salmon have nowhere to spawn, then we could make more hatchery fish to be released in that area. I asked him several times over the years in meetings, for others to hear, how many hatchery fish can we make? He said we can make as many hatchery salmon as we want as long as they are caught. This is a no brainer. We need to make more fish and catch more fish. Everyone benefits.

In a fisheries meeting in Seattle last year with NOAA's Jeromy Jording, (Sustainable Fisheries Division West Coast Region) some of our Puget Sound Anglers chapters were present, along with me, the president, were the PSA Vice Presidents. Jeremy Jording was one of the main federal figure heads at the meeting. I asked him to explain in his own words to the others of how the commercial fishery can catch the excess fish that we cannot. He said that hook and line angling is not efficient enough to catch the amount of hatchery fish required to keep from cutting hatchery production. So basically, every time we try to stop the commercials on the Columbia River, we are cutting hatchery production. This is not acceptable as we all rely on those fish not just the Columbia River fishers.

Other groups would want you to believe this is not the case. Please see attached NOAA's Barry Thom letter to PFMC and highlighted area stating the fact.

Using tables from Page 41 of the draft letter "Management Strategies for Columbia River Recreational and Commercial Fisheries: 2013 and Beyond Working Document for Discussion and Consideration by the Columbia River Fishery Management Workgroup Provided by Oregon and Washington Staff November 9, 2012", with summer chinook, there is really hardly any difference at all in the amount of wild fish getting through at 70/30 compared to 80/20. However, the amount of hatchery fish getting through is significant which means less fish will be released under pHOS at 80/20 than 70/30. Barry's letter backs this up. This letter is the only document we can find that provides any clarification difference on the recreational/commercial ratios. If and when runs become large again such as 200,000 plus then the ratio gets larger for the commercials as hook and line angling lacks the performance required to catch the amount of hatchery fish needed. But at that point everyone is catching a lot more fish. Until alternative means are proven effective and accepted by NOAA, this is the best method we have for increasing sportfish opportunity.

I would be happy to facilitate a meeting with you and either Jeromy and/or Barry so you can hear it straight from them personally. We have already lived out the 160 million Chinook and Coho yearly production cuts and will not survive another one. There are ways to live through ESA and this is one of the main ones. We must have all of our current tools and develop new ones. All factors need to be looked at when making this decision. We would rather have off channel commercial fishing take place, where possible, instead of mainstem. Please move forward with whatever works in this new policy to make more hatchery fish for all of us.

**Sincerely,**

**Ron Garner  
President  
Puget Sound Anglers  
State Board**



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
West Coast Region  
1201 NE Lloyd Boulevard, Suite 1100  
Portland, Oregon 97232-1274

December 21, 2016  
**RECEIVED**

Herb Pollard, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear <sup>Herb</sup>Chair Pollard:

PFMC

As you know, NOAA's National Marine Fisheries Service (NMFS) is reviewing its distribution of Mitchell Act hatchery funds under both the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA). As a result of these reviews, NMFS and the hatchery operators are proposing changes to several of the hatchery programs in the Lower Columbia River to minimize impacts to ESA-listed salmon and steelhead. We realize that fishing communities are interested in understanding the effects of these proposed changes on fisheries and we seek the Pacific Fisheries Management Council's (Council's) assistance in refining our analysis of fishery effects and engaging affected stakeholders in a dialog about these proposed changes and the future of the Mitchell Act program.

The Mitchell Act program is one of our most important means of mitigating for development activities that reduced the capacity of the Columbia River to produce salmon and steelhead. More than 40 percent of the catch of salmon and steelhead in the Columbia River and more than 20 percent of the catch of Chinook and coho salmon along the Washington and Oregon coasts are attributable to production supported by Mitchell Act funding. Tribal and non-tribal fishers from the Columbia River to southeast Alaska depend on Mitchell Act hatchery production to sustain their fisheries.

The Mitchell Act program has evolved over time to meet the needs of stakeholders and the environment. NMFS completed an Environmental Impact Statement (EIS) on the Mitchell Act program in 2014 after a great deal of public engagement. The EIS included a preferred policy direction that prioritizes funding for hatchery programs that include stronger performance goals to minimize the risks of hatchery programs to ESA-listed natural-origin salmon and steelhead.

NMFS first completed ESA consultation on the Mitchell Act program in 1999. Since that time, and through subsequent biological opinions, we have outlined, and the operators have carried out, reforms including: improved monitoring of the status of salmon and steelhead populations; changes in the use of local broodstock; changes in production levels; use of weirs to selectively remove hatchery fish from the spawning grounds; and use of alternative release locations. These measures have helped reduce straying of hatchery fish onto spawning grounds in some locations, and we expect from monitoring that this is benefiting wild populations.



However, we have also realized through continued monitoring that we have more to do. There is still high genetic risk because too many hatchery fish are spawning naturally. There is also ecological risk because juvenile hatchery fish compete with juvenile natural origin fish for food and the same limited rearing habitat. These factors can result in lower abundance, productivity, diversity, and distribution of natural-origin fish than would otherwise occur.

The changes to hatchery programs outlined below are designed to further reduce risks to the ESA listed stocks in the Lower Columbia River, but to do so in a way that minimizes negative effects to tribal, commercial, and recreational fisheries. These actions have been informed by new scientific information that has been collected during the last six years and build on reform measures that the hatchery operators have been implementing over the past 5 to 10 years.

The proposed changes include:

- Modifications to hatchery broodstock
- Changes in location of some hatchery releases
- Installation of weirs in some rivers
- Changes in the number of hatchery fish produced and released

To reduce genetic risks to ESA-listed Lower Columbia River Chinook salmon, NMFS is proposing to reduce tule fall Chinook salmon production in four Mitchell Act funded hatchery programs and to increase tule fall Chinook salmon production in two hatchery programs. This would result in a 4 million net reduction in the number of juvenile tule fall Chinook salmon that would be released from Mitchell Act hatcheries annually. The installation and operation of new weirs in tributary streams will be critical to the success of the overall program and minimizes the need for further production cuts. These proposed changes would be implemented over a five-year transition period, likely beginning with broodyear 2017 and ending with broodyear 2021.

NMFS' preliminary assessment of fishery effects suggests that these proposed production changes would result in a four to seven percent reduction in catch in the following fisheries: North of Falcon non-Treaty troll and sport fisheries, Treaty troll fishery, and the central Oregon coast troll fishery. The effects of these changes would not be felt in fisheries until between 2021 and 2025 because it would likely take up to four years for production changes to be reflected in ocean abundance, given the age structure and maturation rates of tule Chinook salmon.

NMFS is proposing reductions in coho salmon production in five Mitchell Act hatchery programs to reduce straying and resulting genetic effects. However, to offset the impacts of these reductions to fisheries, we propose increases in coho salmon production in one existing Mitchell Act hatchery program, and the initiation of two new Mitchell Act coho salmon hatchery programs. These changes would result in an approximate net increase of 290,000 juveniles that would be produced and released from Mitchell Act funded hatchery programs. NMFS' preliminary assessment of fishery effects suggests that these proposed production changes would result in a two to five percent increase in catch in the following fisheries: South of Falcon, North of Falcon Treaty troll, North of Falcon non-Treaty troll, North of Falcon sport fisheries (Areas 1-4).

NMFS will complete a biological opinion on the proposed changes on or before January 15, 2017. This biological opinion will assess the proposed program in terms of compliance with the ESA, and may recommend further changes. Nothing stated here is meant to prejudice the outcome of that analysis.

Following issuance of the biological opinion, we will work with hatchery managers, Indian Tribes, the Council, stakeholder groups and others to implement important aspects of the strategy including the development of an adaptive management framework and the identification of priorities and strategies for future monitoring, evaluation, and reform. In implementing the biological opinion, we are committed to exploring options under the Mitchell Act to mitigate impacts on the most affected fisheries, consistent with the survival and recovery of ESA-listed salmon and steelhead.

We welcome ideas and input on the implementation of this hatchery strategy and how hatchery production in the lower Columbia River could be restructured to better serve both fisheries and ESA recovery.

If you have any questions, please feel free to reach out to Rob Jones, Branch Chief for Anadromous Production and Inland Fisheries, at (503) 230-5427, or Peter Dygert, Branch Chief for Anadromous Harvest, at (206) 526-6734.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry A. Thom". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Barry A. Thom  
Regional Administrator



**From:** [Commission \(DFW\)](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** FW: What others are saying about Policy C-3620  
**Date:** Tuesday, September 1, 2020 2:55:43 PM  
**Attachments:** [C-3620, What Others Are Saying.pdf](#)

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**From:** Nello Picinich <nello.picinich@ccawashington.org>  
**Sent:** Tuesday, September 1, 2020 2:19 PM  
**To:** Linville, Molly F (DFW) <Molly.Linville@dfw.wa.gov>; bbakerwdfw@gmail.com; Thorburn, Kim M (DFW) <Kim.Thorburn@dfw.wa.gov>; lc3896@gmail.com; bradley.smith@wwu.edu; fishboy@nwi.net; rfk@psvoa.com; donald.mcisaac@dma-consulting.net; Anderson, James R (DFW) <James.Anderson@dfw.wa.gov>  
**Cc:** odfw.commission@state.or.us; Commission (DFW) <COMMISSION@dfw.wa.gov>  
**Subject:** What others are saying about Policy C-3620

Hello Commissioners,

Attached is a document that consolidates links and key quotes from legislators, county officials, recovery boards, conservation groups and other organizations that have recently weighed in on the proposed changes to Policy C-3620.

Thank you,

Nello Picinich, Executive Director  
CCA Washington  
(360) 694-4300



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## **WDFW's Proposed Columbia River Fishery Policy C-3620 What Others Are Saying**

### **15 Washington State Senators; 21 Washington State Representatives**

“While the fundamental components of the reforms remain sound, WDFW has not implemented key aspects of the reforms, including pursuing a gillnet license buyback and correcting agency errors toward implementing alternative, selective commercial fishing gears.

Instead of committing to addressing these failures, the draft policy being considered by the Commission abandons the reforms and opens the door to year-round gillnetting in the mainstem Columbia River. The draft policy is also inconsistent with the legal requirements in place in the State of Oregon, setting the stage for a possible break in concurrent management for the first time since the Columbia River Compact was adopted in 1915.”

“Adopting a policy that formally abandons the bi-state Columbia River reforms will elicit strong opposition to any fee increase legislation, which could have serious implications for WDFW's 2021-2023 operating budget as the state grapples with reduced revenues due to COVID-19.”

### **100+ Sportfishing/Conservation Organizations and Businesses**

“The CRW proposal cuts mark-selective recreational fisheries during both the spring and summer – January 1 through July 31 - and replaces them with mainstem gillnet fisheries that are either less selective (i.e., “tangle nets”) or completely non-selective. At a time when many stocks of Columbia River wild salmon, wild steelhead and sturgeon are seeing dramatic declines, the CRW proposal would reduce the selectivity of Columbia River fisheries, increase bycatch of non-target species like sturgeon, and expose ESA-listed salmon and steelhead to additional mortalities in mainstem gillnet fisheries.”

“Instead of compromising on conservation and devolving Columbia River fisheries into conflict and chaos, we urge the Commission to adopt a policy consistent with the State of Oregon's rules, and which also includes a plan for fully transitioning gillnets out of the lower mainstem Columbia River.”

### **Trout Unlimited**

“With most wild stocks of salmon and steelhead within the Columbia River Basin being listed for protection under the Endangered Species Act (ESA) and recently experiencing some of the worst returns on record, we strongly encourage you to reconsider this shift in policy, uphold the intention as the original policy stated, and not restore year-round non-tribal commercial gill netting to the mainstem Columbia River.”

“First, we have a serious concern with the lack of studies and understanding about the gill net release mortality impacts on by-catch, particularly the unknown impacts to wild summer steelhead.”

“This dearth of necessary data and studies to fully understand the mortality rates of the non-selective gill net fisheries on by-catch is compounded by the lack of onboard vessel monitoring during these fisheries and is our belief leads to a severe under-reporting of summer steelhead by-catch. Based on [a](#)

[presentation from WDFW staff at a November 3, 2018](#) Commission meeting, observations of traditional mainstem Chinook salmon gillnet fishery have occurred during only six seasons in the past 23 years. This lack of onboard monitoring and associated reporting only highlights our concerns with under-reported by-catch and release mortality rates.”

### [CCA/NSIA/NMTA/Steelheaders](#)

“We have not heard a single argument put forward by the CRW for how the proposed changes to fisheries management will improve the conservation of Columbia River basin salmon and steelhead populations. Instead, we have heard terms like “no additional fishing pressure” and staying under the “ESA impact limits” included in no jeopardy biological opinions from NOAA Fisheries. This does not represent a forward-looking approach to conservation, including considering how fisheries should be managed to help meet wild fish escapement and pHOS objectives.”

“Is the Washington Commission willing to compromise on its conservation mandate, risk breaking concurrent management with the State of Oregon, and undermine its support with the public, the recreational fishing community, conservation organizations, and elected officials for an additional estimated \$133,000 in annual ex-vessel value for a handful of gillnet license-holders and commercial fish buyers?”

### [Wild Fish Conservancy](#)

“We would further like to draw to your attention the fact that gill net release mortality impacts currently remain unstudied and unknown for critical bycatch stocks such as ESA-listed wild steelhead. As we have conducted our selective gear research and navigated the peer-review process, we have gained insight into the U.S. v. OR Technical Advisory Committee (TAC) gear mortality review process and observed unequivocally that currently approved steelhead mortality rates for gill nets are based on assumptions, with no grounding in gill net release mortality data or sound science (ODFW and WDFW 2018).”

“Back-tracking on your commitment to mark-selective fisheries in the mainstem Columbia River will likely increase escapement of hatchery fishes to wild salmonid spawning grounds, with measurable impacts to the reproductive success and survival of future wild populations (Chilcote et al. 2011; Christie et al. 2013). Furthermore, a shift back to mainstem non-selective fisheries will result in mixed-stock harvest of more wild-origin fishes of both ESA-listed and unlisted populations – including non-target species like steelhead.”

### [Wild Salmon Center](#)

“There have been immense sacrifices made throughout the region to try and give salmon and steelhead a chance. Salmon recovery efforts led by Tribes and local government have been key in keeping funding and attention focused on restoring these runs. Both the federal and state government have spent millions to improve monitoring, implement habitat restoration projects and improve pacific salmon treaty harvest management activities. Now is not the time to throw these investments away.”

### The Conservation Angler

“Focusing on Policy Reform for C-3620 without conservation elements is akin to trying to sit on a one-legged stool. The Columbia River fishery management regime is being considered here without adequate relationships to conservation (in both fishery and hatchery management) and without a relationship to habitat protection and conservation.”

“The Conservation Angler finds the recommendations of the Policy Review Committee to be out of order, lacking a sufficiently sound scientific basis, non-responsive to the Department’s own review of Policy C3620 completed in 2018 and finally, inconsistent with Basin-wide efforts to recover ESA-listed wild steelhead and salmon populations.”

### Chelan, Douglas and Okanogan Counties

“Retain the existing ban of non-treaty commercial fishing in the mainstem Columbia River for spring Chinook.”

“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 the 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.”

### Franklin County

“Eastern Washington citizens and conservation groups have worked for decades to restore habitat and support the conservation and recovery of ESA-listed salmon and steelhead populations. Those efforts have required great sacrifices along the way. To see those efforts largely ignored and undermined by policies that promote non-selective harvest on the lower Columbia River is clearly harmful to the resource we all support, and incredibly upsetting for anglers, businesses, and conservationists in Franklin County. The surest way to demoralize and undercut our citizens’ support of conservation methods is to show you want their support, but don’t have much regard for upriver migration and their access to the resource. The current Fishery Policy Workgroup proposal effectively sends exactly that message.”

### Snake River Salmon Recovery Board

“We have spent a great deal of time on this and have made no gains in upriver allocation nor specific conservation objectives beyond meeting ESA take criteria. While we manage runs to stay within ESA take limits, we have not adequately considered run timing within the seasonal runs themselves – we need to be more conservative for conservation purposes and for future fishing opportunity. We have worked with our partners in SE Washington to implement the state and federally approved recovery plan actions, specifically bringing habitat restoration and conservation work to fruition. How are we moving towards recovery and meeting hatchery brood stock and escapement needs upriver if we keep harvesting to the maximum possible numbers in low run years?”

### Lower Columbia River Fish Recovery Board

On the CRW's removal of key language from C-3620: "This recommended addition is from the original policy, and emphasizes the importance of conserving and recovering natural origin fish, and increasing harvest of abundant hatchery fish. These are critical elements of the original policy that are still very relevant today. This is important given the continued preponderance of hatchery fish in the Columbia (greater than 2/3 returns), ongoing challenges with reducing pHOS, and the need to intercept more hatchery fish in fisheries."

### Association of Northwest Steelheaders

"Especially concerning are the proposed revisions to allow wild-kill, non-mark selective gillnetting of spring and summer Chinook. Recreational anglers are restricted to mark-selective, live-release fisheries on these stocks in order to conserve wild fish while providing for harvest of abundant hatchery fish. Fisheries scientists, including WDFW managers, have publicly emphasized the importance these mark-selective regulations play in achieving conservation objectives while allowing for meaningful fisheries. In particular, we understand from WDFW managers that the recreational fishery for summer Chinook is prosecuted under mark-selective, live-release regulations in order to help achieve conservation goals related to the proportion of hatchery fish spawning in the wild. Allowing a wild-kill commercial gillnet fishery on spring and summer Chinook would undermine these important management objectives, along with recreational angler support for them."

### Northwest Sportfishing Industry Association

"Is it the best public policy to try to turn back the clock, repeal fundamental elements of the Reform Policy, and reignite conflicts with stakeholders, landowners, the conservation community, and elected officials? The proposal policy revisions would provide less conservation of wild stocks, decrease the overall economic benefits of the fishery to the State of Washington, harm jobs in the sportfishing industry, and erode public trust and confidence in WDFW and the Commission. Is this really the best "path for a new era?"

### Backcountry Hunters and Anglers

"With nearly half of the salmon and steelhead stocks on the Columbia and Snake River listed as threatened or endangered, it is unacceptable to take this step backwards in management and accept mortality rates at this level on these stocks of fish."

Additionally, the increase in take and mortality of listed fish directly reduces recreational fishing opportunities. Anglers in Washington are continuing to see recreational opportunities diminished to reduce or eliminate impacts on ESA listed stocks of fish. If year-round gillnetting is allowed in the lower Columbia River, opportunity will be reduced by 11-25% compared to the State of Oregon. This is in direct contradiction to the stated objective above of Policy C-3620 and will have a significant impact on the sport fishing economy and the many other business that rely on anglers to drive revenue.

Backcountry Hunters and Anglers opposes this recommendation and asks the CRW continue to work with the state of Oregon to meet the objectives of Policy C-3620 set in 2013."

In closing, below are general comments from WDFW senior staff that were made concerning the use of gillnets and Policy C-3620.

**WDFW Director Kelly Susewind**

“We understand that gillnets are not the final answer to this problem. That is why we remain committed to developing new selective methods for commercially harvesting salmon in the Columbia River and implementing the objectives in the Columbia River Basin Salmon Management policy.”

**WDFW Special Assistant Bill Tweit**

“Policy C3620 was built to achieve this, and the recent 5 year review did not identify any flaws with the basic architecture. Instead, the 5 year review identified flaws with implementation issues. We were not able to meet the timeline assumed in the policy for various reasons that are identified in the review. Which is why the Commission chose to prolong the period of time that gillnets can be used, to bring alternative gear development back into alignment with transitioning some or all of the mainstem commercial fishery away from gillnets.”

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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 Salmon Fishery Policy (C-3620) Comments  
**Date:** Wednesday, September 2, 2020 9:28:24 AM

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Looks like there are 15 of these so far. Thanks!

**From:** William Borquist <bborquist@comcast.net>  
**Sent:** Wednesday, September 2, 2020 9:15 AM  
**To:** Commission (DFW) <COMMISSION@dfw.wa.gov>  
**Subject:** Columbia River Salmon Fishery Policy (C-3620) Comments

Dear WA Fish and Wildlife Commission,

Dear WA Fish and Wildlife Commissioners,

As a recreational angler and member of the Association of Northwest Steelheaders, I strongly oppose the Commission's proposal to abandon the bi-state Columbia River Reforms and Policy (C-3620). The proposal to restore year-round, non-selective commercial gillnetting to the mainstem lower Columbia River, and reduce wild-release recreational angling, is a step backwards that will harm ESA-listed salmon and steelhead populations, which continue to decline perilously toward extinction. Why would we want to restore wasteful and impactful commercial harvest methods to the mainstem when our wild stocks are not recovering?

Reinstating gillnets and reducing sport fishing opportunity will also harm the recreational fishing community - an incredibly important component of Washington's economy. Over 900,000 anglers purchased fishing licenses last year, generating an estimated economic output of nearly \$2.4 billion, and supporting over 15,000 jobs for the state. Further, the recreational fishing community is essential for funding fishery conservation initiatives and supporting wild salmon recovery.

I urge you to reconsider this misguided proposal. We need innovative management strategies to protect at-risk species and fishing opportunities, not antiquated policies that fuel conflict among the fishing community. I, and hundreds of other Steelheaders in Washington ask you to reject this proposed policy during your September 11th meeting. Instead of backtracking, I urge the Washington Commission to adopt a policy consistent with the State of Oregon's rules and develop a plan to fully transition non-treaty gillnets out of the lower mainstem Columbia River.

Thank you for your consideration.

Sincerely,  
William Borquist  
2468 N. 3rd St.  
Washougal, WA 98671

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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 Weekender Report: Hunting seasons underway, salmon move upriver  
**Date:** Wednesday, September 2, 2020 9:30:32 AM

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**From:** James Flyr <deepbluewater66@yahoo.com>  
**Sent:** Wednesday, September 2, 2020 9:01 AM  
**To:** Do Not Reply (DFW) <Do.Not.Reply@dfw.wa.gov>; Cunningham, Kelly J (DFW) <Kelly.Cunningham@dfw.wa.gov>; Commission (DFW) <COMMISSION@dfw.wa.gov>  
**Subject:** Re: WDFW Weekender Report: Hunting seasons underway, salmon move upriver

Seems to me your WDFW mission statement is a little far off base by letting the KILL NETS back into the Columbia river!!!!!!!!!!!!!!

Could you also give me as to where I might find out how many fish the KILL NETS netted????

Seems like you all hide when it comes to replying to e mails.

Jim Flyr

On Tuesday, September 1, 2020, 03:42:51 PM PDT, WDFW Public Affairs <[do.not.reply@dfw.wa.gov](mailto:do.not.reply@dfw.wa.gov)> wrote:

## **WDFW WEEKENDER REPORT**

Washington Department of Fish and Wildlife  
1111 Washington St. SE, Olympia, WA 98501  
<http://wdfw.wa.gov>

### **September 2020**

**Contact:** (Fish) 360-902-2700  
(Wildlife) 360-902-2515

## **Hunting seasons underway, salmon move upriver**

The sun is setting earlier and the leaves are starting to turn – signs of another change of season. Fall is in the air, and hunters are heading out for the year's major hunting seasons as anglers are still reeling in salmon from the Columbia River, Puget Sound, and other fisheries, plus trout from lakes throughout Washington.

### **September highlights include:**

- **Deer and elk:** Early general archery hunts will open for deer and elk in many areas of the state.
- **Youth-only hunts:** The special pheasant hunt for hunters under age 16 is Sept. 19-20 statewide.
- **65+ or disability hunts:** The special pheasant hunt for hunters 65+ or hunters with disabilities is Sept. 21-25.
- **Eastern Washington lakes:** This month is the last chance to fish several of the region's rainbow and cutthroat trout fishing lakes.



- **Puget Sound halibut:** Marine Areas 5-10 are open three days per week, Thursdays, Fridays, and Saturdays, through Sept. 30 or until the remaining quota is taken.

With wildfires burning in several areas of the state, hunters and people recreating outdoors are advised to [check fire conditions](#) and for related access closures before heading out. Fire restrictions are in effect on lands managed by WDFW.

For information about hunting, fishing and wildlife viewing opportunities available this month in each region of the state, see the [Weekender Regional Reports](#).

The Washington Department of Fish and Wildlife is the state agency tasked with preserving, protecting and perpetuating fish, wildlife, and ecosystems, while providing sustainable fishing and hunting opportunities.

*Persons with disabilities who need to receive this information in an alternative format or who need reasonable accommodations to participate in WDFW-sponsored public meetings or other activities may contact Dolores Noyes by phone (360-902-2349), TTY (360-902-2207), or email ([dolores.noyes@dfw.wa.gov](mailto:dolores.noyes@dfw.wa.gov)). For more information, see [http://wdfw.wa.gov/accessibility/reasonable\\_request.html](http://wdfw.wa.gov/accessibility/reasonable_request.html).*

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To **UNSUBSCRIBE** from this mailing list: <http://wdfw.wa.gov/lists/unsubscribe.html>

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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: Fishing / Shellfishing  
**Date:** Wednesday, September 2, 2020 3:44:17 PM

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**From:** Greg Horn <noreply@123formbuilder.com>  
**Sent:** Wednesday, September 2, 2020 3:27 PM  
**To:** Commission (DFW) <COMMISSION@dfw.wa.gov>  
**Subject:** Contact the Commission: Fishing / Shellfishing

<b>Name</b>	Greg Horn
<b>Email</b>	<a href="mailto:grhorn@yahoo.com">grhorn@yahoo.com</a>
<b>Address</b>	1500 West Lauridsen Boulevard Port Angeles wa 98363
<b>Subject</b>	Fishing / Shellfishing
<b>Message</b>	please permanently remove industrial gillnets from the Columbia River. thank you
<b>Attachment</b>	

The message has been sent from 172.92.110.69 (United States) at 2020-09-02 18:26:54 on Chrome 85.0.4183.83  
Entry ID: 2399

**From:** [Lothrop, Ryan L \(DFW\)](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** FW: Response to Rep. Stonier Letter RE: C-3620  
**Date:** Wednesday, September 2, 2020 9:19:50 AM  
**Attachments:** [signed letter to Rep Stonier RE C.3620.pdf](#)

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Tribal comment.

Ryan Lothrop  
Washington Dept. of Fish and Wildlife

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**From:** McBride, Tom A (DFW) <Tom.McBride@dfw.wa.gov>  
**Sent:** Wednesday, September 2, 2020 9:06 AM  
**To:** Lothrop, Ryan L (DFW) <Ryan.Lothrop@dfw.wa.gov>  
**Subject:** Response to Rep. Stonier Letter RE: C-3620

**Subject:** Response to Rep. Stonier Letter RE: C-3620

Afternoon Chair Carpenter and Director Susewind,

Please see attached letter from Chairman Yanity in response to Representative Stonier's letter regarding Columbia River Basin Salmon Management Policy C-3620.

If any questions or further discussion is needed, please let me, Shawn or Kadi know.

Thanks, have a good day.

-----

**Kathryn Konoski**

***Fisheries Program Manager***

*Stillaguamish Tribe of Indians Natural Resources Department*

"Kate", She/Her

Office: 360.631.5875

Cell: 360.547.2691



## Stillaguamish Tribe of Indians

PO Box 277 · 3322 236<sup>th</sup> St. NE  
Arlington, WA 98223

August 26, 2020

Monica Jurado Stonier  
Representative, 49<sup>th</sup> Legislative District  
JLOB 331  
PO BOX 40600  
Olympia, WA 98504

### **Re: Columbia River Basin Salmon Management Policy (C-3620)**

Dear Representative Stonier and Members of the Committee,

The Tribe has reviewed the proposed changes to the Columbia River Basin Salmon Management Policy (C-3620), as well as your letter addressed to Chairman Carpenter and Director Susewind dated August 24, 2020, and we would like to reiterate our continued opposition to any form of a gill-net ban for non-tribal fishers. We are very concerned not only with your arguments as to the merits of a gill-net ban for non-tribal fishers, but with the prospect that this may be the first step toward attempting to enact an overall gill-net ban. Although our Tribe does not execute a fishery in the Columbia River, as a Tribe with treaty-reserved fishing rights with a co-manager relationship with the State of Washington, we, along with other Tribes, are entitled to government-to-government consultation before the States take any actions that could be deleterious to our treaty rights.

Harvest must be within the permitted total allowable impacts under Endangered Species Act (ESA); regardless if it is commercial non-selective gill-netting or recreational mark-selective fisheries. With the continual decline of salmon populations, we would like to stress that the importance of salmon recovery should not be focused narrowly to harvest opportunities or gear type arguments, but to habitat restoration and recovery.

Upon review of the C-3620, we acknowledge the continued commitment of the Washington Fish and Wildlife Commission to further develop and implement adaptive management policies, and understand your concern with the removal of specific language regarding gill-nets that was complimentary to Senate Bill 5617 and this continued effort to obtain a ban within the Columbia River Basin.

We agree that all fisheries, not just those executed within the Columbia River basin, require careful and proactive management in response to declining salmon and steelhead populations, especially those listed under the federal ESA. We however disagree that a solution is to prioritize Mark-Selective Fishing (MSF) under the guise of “recovery needs” for the ESA-listed

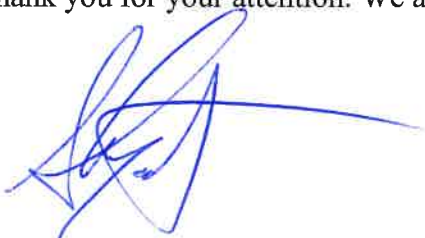
salmon and steelhead populations. During ESA consultation and review of fisheries for permitting, NMFS determines whether these actions will impede recovery, not promote, thereby fisheries cannot be executed as a protection to natural populations. MSF still has impact on ESA-listed salmon and at a greater degree of uncertainty than non-selective fishing, especially with the lack of funding to further expand understanding on release/handling mortalities and fishery encounter estimations. Funding is also needed for establishing robust in-season monitoring plans and increasing fisheries enforcement, with commitment to prosecute illegal retention. We feel that fishing practices in themselves are not the issue, but the actual management of these fishing practices are.

We also disagree with the implication that hatchery produced fish are in “excess” and are required for removal from escapement. Within the Columbia River Basin there are 208 hatchery programs, 90 of which release ESA listed stocks, and are a mix of Harvest or Recovery Programs, both of which may be defined as integrated (intended to spawn in wild or genetically integrate) or isolated (not intended to spawn in wild or genetically integrate). These different program types are not all required to remove hatchery fish as a condition of continued hatchery production. For example, the summer run Chinook and fall run Chinook hatchery programs within the Stillaguamish Watershed are Integrated Recovery Programs. Juvenile releases are produced specifically for natural spawning and maintaining, with the potential of increasing, the annual returns of salmon. Therefore, hatchery fish produced for integration must also be allowed to escape in efforts towards Salmon Recovery and are not produced specifically for harvest and required for removal.

MSF and hatchery produced salmon cannot alone be used as a measure of providing increased escapement of ESA listed and weak wild stocks, unless habitat recovery is the highest priority, as habitat degradation continues to be the major limiting factor to salmon recovery. Within the Stillaguamish River, despite two decades of Mark-Selective Fishing, overall reduced fishing efforts from the co-managers, and a continual hatchery production since 1986, the Stillaguamish natural populations have continually declined (Figure 1). It is also suggested through preliminary data analysis that although hatchery production has remained static, returns of our hatchery spawners have also declined, thus lowering total escapement of adults in recent years.

Lastly, you state that WDFW revenue is “much needed” and referenced their strained operating budget, so we request that you prioritize and increase funding to provide the tools and resources necessary to implement effective management of fishery practices.

Thank you for your attention. We are opposed to any form of a gill-net ban for non-tribal fishers,



Shawn Yanity  
Chairperson - Stillaguamish Tribe

CC: Kadi Bizyayeva  
Scott Mannakee  
Kathryn Konoski  
Peggen Frank  
Mara Machulsky  
J.T. Austin  
Larry Carpenter  
Kelly Susewind  
Larry Hoff  
Andrew Barkis  
Carolyn Eslick  
Tom Dent  
Keith Goehner  
Mary Dye  
Roger Goodman  
Bill Jenkin  
Joe Schmick  
Bradley Klippert  
Drew MacEwan  
Ed Orcutt  
Mike Sells  
Strom Peterson  
Tana Senn  
Eric Pettigrew  
Brandon Vick  
Sharon Wylie  
Alex Ybarra  
Mia Gregerson

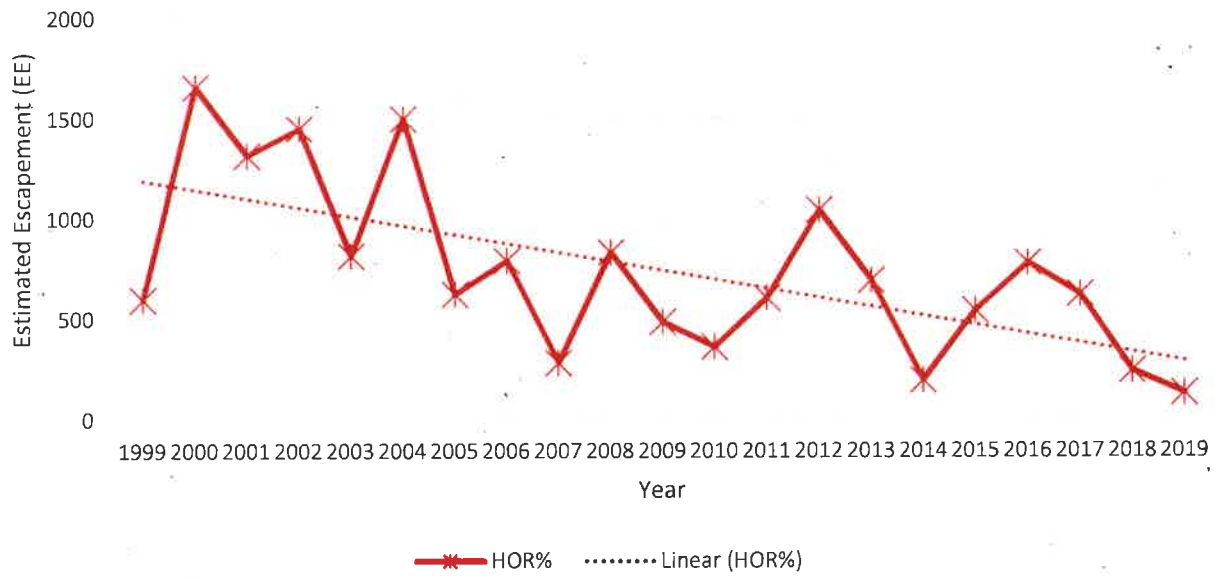


Figure 1. Co-Manager Agreed to Stillaguamish River natural origin Chinook (summer & fall combined) estimated escapements, 1999-2019.

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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 Salmon Fishery Policy (C-3620) Comments  
**Date:** Wednesday, September 2, 2020 4:43:12 PM

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Received another 100 of these. Thanks!

**From:** Scott Van den Akker <pdxsv@aol.com>  
**Sent:** Wednesday, September 2, 2020 4:33 PM  
**To:** Commission (DFW) <COMMISSION@dfw.wa.gov>  
**Subject:** Columbia River Salmon Fishery Policy (C-3620) Comments

Dear WA Fish and Wildlife Commission,

Dear WA Fish and Wildlife Commissioners,

As a recreational angler and member of the Association of Northwest Steelheaders, I strongly oppose the Commission's proposal to abandon the bi-state Columbia River Reforms and Policy (C-3620). The proposal to restore year-round, non-selective commercial gillnetting to the mainstem lower Columbia River, and reduce wild-release recreational angling, is a step backwards that will harm ESA-listed salmon and steelhead populations, which continue to decline perilously toward extinction. Why would we want to restore wasteful and impactful commercial harvest methods to the mainstem when our wild stocks are not recovering?

Reinstating gillnets and reducing sport fishing opportunity will also harm the recreational fishing community - an incredibly important component of Washington's economy. Over 900,000 anglers purchased fishing licenses last year, generating an estimated economic output of nearly \$2.4 billion, and supporting over 15,000 jobs for the state. Further, the recreational fishing community is essential for funding fishery conservation initiatives and supporting wild salmon recovery.

I urge you to reconsider this misguided proposal. We need innovative management strategies to protect at-risk species and fishing opportunities, not antiquated policies that fuel conflict among the fishing community. I, and hundreds of other Steelheaders in Washington ask you to reject this proposed policy during your September 11th meeting. Instead of backtracking, I urge the Washington Commission to adopt a policy consistent with the State of Oregon's rules and develop a plan to fully transition non-treaty gillnets out of the lower mainstem Columbia River.

Thank you for your consideration.

Allowing gill nets in the Columbia is crazy! Let's work on bringing fish stocks back to a healthy level, and then look at how we will address harvest allocations. The sport fishing industry is the life blood of many of our communities. Keep it strong

Sincerely,  
Scott Van den Akker



18345 SE Young's Ln  
Damascus, OR 97089

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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:** [Lothrop, Ryan L \(DFW\)](#); [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** FW: Camas/Washougal Fall Chinook Season  
**Date:** Thursday, September 3, 2020 10:24:35 AM

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

From: Jamie W <[spingloo@gmail.com](mailto:spingloo@gmail.com)>  
Sent: Thursday, September 3, 2020 9:07 AM  
To: Commission (DFW) <[COMMISSION@dfw.wa.gov](mailto:COMMISSION@dfw.wa.gov)>  
Subject: Camas/Washougal Fall Chinook Season

By this date, between 08/01 - 09/02, Fall Chinook over the Dam:  
2017 - 54,604. Days allowed to fish- 33  
2018- 60,813. Days allowed to fish- 33  
2019- 62,758. Days allowed to fish-33  
2020- 130,000. Days allowed to fish- 12  
Those numbers speak for themselves.  
Thank you, and have a good day.  
Jamie Watts 360-903-2347

Sent from my iPhone

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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: Expansion of Columbia River gillnet fisheries  
**Date:** Tuesday, September 8, 2020 1:26:02 PM

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**From:** Adrian Cortes <flyfishingposer@gmail.com>  
**Sent:** Tuesday, September 8, 2020 1:01 PM  
**To:** Commission (DFW) <COMMISSION@dfw.wa.gov>  
**Subject:** Re: Expansion of Columbia River gillnet fisheries

To Whom it May Concern:

The consideration of expanding the gillnet fishery in the Columbia River is a terrible idea. With salmonid stocks endangered and on the decline, any added challenge to these anadromous fish can tip the precipitous imbalance that their species are barely clinging to for survival.

Please reconsider for the sake of our future.

Sincerely,  
Adrian Cortes  
25685 South Beaver creek Rd  
Beaver creek, OR  
97004

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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: C-3620  
**Date:** Tuesday, September 8, 2020 3:34:35 PM

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**From:** JOSEPH DURHAM <jofishn@comcast.net>  
**Sent:** Tuesday, September 8, 2020 2:31 PM  
**To:** Larry Carpenter <lc3896@gmail.com>; Commission (DFW) <COMMISSION@dfw.wa.gov>; Susewind, Kelly (DFW) <Kelly.Susewind@dfw.wa.gov>  
**Cc:** Nello Picinich <nello.picinich@ccawashington.org>; Norm Cole <ncofire45@gmail.com>; John Rabey <jrabey@centurytel.net>; Francis Estalilla <estalillamd@comcast.net>; Fred Pentt <fishpent@comcast.net>  
**Subject:** C-3620

Commission; I would hope on the vote on C-3620 the 11th. of Sept, that attention would reflect the long list of Legislators who oppose any change to the Columbia River Fishery Reforms. As well as the list of Fishers and Business that oppose the change.

The wild stocks of Salmon and Steelhead will not be able to sustain the pressure place upon their survival to reach healthy spawning grounds, if there are many left. In my view over the 40plus years I have observed, and spoke so much against, There are no reasons to have , in Washington controlled waters, any form of commercial fishing. Gill nets are a thing of the past that causes more destruction than good. The by-catch, and loss, of listed fish far out weighs the value of the fishery.

I urge You to stand up for the continues rehabilitation of the resource, not the destruction.

VOTE TO RETAIN C-3620. And urge Oregon to do the same.

Thank You;

Joe Durham

A wild Fish Conservationist, Aberdeen, WA.

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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 Salmon Fishery Management Policy (C-3620)  
**Date:** Tuesday, September 8, 2020 11:51:08 AM

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**From:** Richard Harrington <[richard@richardcharrington.com](mailto:richard@richardcharrington.com)>  
**Sent:** Tuesday, September 8, 2020 9:25 AM  
**To:** Commission (DFW) <[COMMISSION@dfw.wa.gov](mailto:COMMISSION@dfw.wa.gov)>  
**Subject:** Columbia River Salmon Fishery Management Policy (C-3620)

Dear WFWC,

Please reject the Columbia River Salmon Fishery Management Policy (C-3620), which would allow year round gilnetting on the Columbia. All anadromous fish populations are at or near historical lows, with some in such poor condition they qualify as endangered. A non-discriminatioing approach to harvest like gilnetting produces too much lethal bycatch to already threatened populations.

Thank you,

Richard Harrington  
Oregon City, Oregon.

**From:** [Commission \(DFW\)](#)  
**To:** [Barbara Baker](#); [Bob Kehoe](#); [Brad Smith](#); [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: Wild Steelhead Coalition Letter on Columbia River Salmon Fishery Policy  
**Date:** Tuesday, September 8, 2020 1:15:06 PM  
**Attachments:** [WSC Columbia River Salmon Fishery Management Policy Letter.pdf](#)

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**From:** Paul Moinester <paul@wildsteelheadcoalition.org>  
**Sent:** Monday, September 7, 2020 4:48 PM  
**To:** Commission (DFW) <COMMISSION@dfw.wa.gov>  
**Cc:** Gregory Topf <whereisgreg@gmail.com>  
**Subject:** Wild Steelhead Coalition Letter on Columbia River Salmon Fishery Policy

On behalf of the Wild Steelhead Coalition's thousands of members, please consider the attached comments on the Columbia River Salmon Fishery Management Policy in advance of your meeting on September 10th. **Thank you for your consideration of our comments and for your work to protect wild steelhead and salmon in the Columbia Basin.**

Best regards,

Paul



September 7, 2020

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

Dear Chair Carpenter and Commissioners,

Thank you for the opportunity to comment on the Commission's review of Columbia River Salmon Fishery Management Policy (C-3620). On behalf of the Wild Steelhead Coalition's thousands of members, we are writing to express our strong opposition to the June 10, 2020 recommendations by the Commission's Columbia River Workgroup (CRW). With the Columbia's wild steelhead and salmon populations struggling and facing increasingly imminent threats such as climate change and habitat loss, the last thing these declining salmonid stocks need is the expansion of destructive gillnet fisheries on the mainstem lower Columbia River. Therefore, we urge the Commission to reject this misguided proposal.

The Columbia once boasted the strongest run of salmonids in the world. However, over the last century, these once abundant fisheries have been reduced to a fraction of their historic size. As a result, a new, disturbing tradition has emerged on the Columbia where every summer anglers are treated to a round of heartbreaking news about historically low runs and emergency closures, rather than the most prolific salmonid runs on the planet.

There are many causes of this salmonid decline, but irresponsible fishing practices are at the top of the list, which is why it is so confounding that the CRW would decide to reinstate destructive gillnet fisheries for spring and summer kings in the mainstem. By restoring year-round gillnetting to the mainstem lower Columbia River, the CRW is greenlighting a non-selective fishery that generates high levels of lethal bycatch and will further endanger ESA-listed salmon and steelhead.

Particularly troubling is that alternatives to antiquated gillnet fisheries that are less impactful on ESA-listed fish do exist, such as pound nets that have been demonstrated to cause almost no incidental mortality. Therefore, rather than doubling down on non-selective commercial fisheries that will further imperil ESA-listed species, the state should be investing in the widespread implementation of these more sustainable fishing practices. Not only would the implementation of selective harvest practices protect ESA-listed fish, it would also help ensure a more enduring and prosperous fishery for both the commercial sector and recreational anglers.

In addition to the aforementioned issues with the CRW's recommendations, we are also concerned about the impacts these policy changes could have on the concurrent management of the Columbia River between the states of Oregon and Washington. It is essential that this foundational management partnership continue, and we do not want these policy reforms to endanger this critical co-management.

Considering the current state of the Columbia's steelhead and salmon runs, as well as the fact that their survival is only going to become increasingly difficult due to climate change, we need to be doing



everything we can to eliminate threats to salmonid recovery and responsibly manage our fisheries. Unfortunately, the CRW's recommendation to restore gillnet fisheries represents a massive step backwards in responsible fisheries management, as it would reinstate a major driver of salmonid decline. As a result, we strongly encourage the Commission to reject the CRW's proposal.

Thank you for your consideration of our comments and for your work to protect wild steelhead and salmon in the Columbia Basin.

Sincerely,

Greg Topf  
Board of Directors  
Wild Steelhead Coalition