



COASTAL CONSERVATION ASSOCIATION

April 17, 2018

SENT VIA E-MAIL

Mr. Thom,

We are writing to you today to express our concerns with a proposal from the Oregon and Washington departments of fish and wildlife (departments) currently pending before the *US v. Oregon* Technical Advisory Committee (TAC) to reduce the release mortality rates assigned to commercial gillnets and “tangle nets” used in Columbia River fall gillnet salmon fisheries. We believe the proposal lacks adequate scientific support and will likely result in additional steelhead mortalities at a time when many steelhead stocks, including ESA-listed “B-run” steelhead, face serious conservation challenges. We urge NOAA Fisheries to closely scrutinize this proposal considering the major uncertainty and alarming precedent it would set.

In February, the departments requested that TAC consider a proposal to reduce the immediate release mortality rate applied for steelhead caught in gillnets based on non-scientific observer data from 2009, 2012, and 2017. The proposal also seeks to assign a new long-term release mortality rate for steelhead based on the results of seven post-release mortality rate studies, only one of which involved traditional gillnets. Amazingly, the total gillnet mortality rate currently used by the departments includes a 10% long-term release mortality rate for steelhead that lacks any basis in science or empirical data – it is a complete guess. Unfortunately, the latest proposal from the departments also suffers from serious flaws.

Observer data was not based on a scientific study. No effort was made to mark the condition of released steelhead beyond simply noting whether they were dead or alive when they were brought on board as bycatch. Previous studies on other gear types have utilized a five-point grading scale to record the condition of the fish more accurately, ranging from lively to dead. It is unclear why the departments didn’t record this type of information if they intended to utilize this data as a measurement of immediate mortality. Accurately recording immediate mortality was also made more challenging due to darkness and no effort was made to incorporate the known connection between soak times and increased mortality (this fishery occurs at night and has no soak time limits).

Proposed long-term mortality rate relies on studies for other gears, other species, and different fishing seasons. The departments apparently concluded that they could not defend the 10% long-term mortality “add-on” that lacked any support in science or empirical data. Instead of conducting a long-term mortality study on 9-inch and 8-inch large-mesh gillnets during the fall, the proposal instead points to studies conducted on other gears and during different fishing seasons.

Only one of the seven long-term mortality studies cited in the departments’ proposal involved traditional gillnets and that study took place in the spring, when water temperatures are much lower than the fall and soak time limits are in place. The other six studies measured long-term mortality rates for small-mesh “tangle nets” and seines. A majority of the studies involved Chinook and Coho, not steelhead. The departments’ analysis relied on the long-term mortality studies conducted in 2013 for steelhead caught in seines, but conveniently did not utilize the results for Coho and Chinook, which despite our criticism of those studies, represents some of the most recent data available that has undergone TAC review.

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NOAA should carefully consider the precedent this proposal would set. We are concerned about the precedent approving these proposed mortality rate changes would set. The proposals' reliance on unscientific monitoring data and long-term mortality studies on gears and fishing seasons other than the fishery in question undercuts public confidence in the management of commercial fisheries and highlights the double standard taken on the testing of alternative, selective fishing gears, such as seines and pound nets. We fear that the departments' flawed approach will also erode the willingness of recreational anglers to continue funding extensive ongoing monitoring and scientific studies to measure mortality in recreational fisheries.

In addition to the concerns outlined above, we are unaware of any effort to measure the "drop out" mortality experienced by steelhead that encounter these nets underwater and swim free prior to being brought on board as bycatch. In addition, the discovery of multiple steelhead caught as bycatch and dumped by an individual gillnet fisher in the Tongue Point off-channel area last fall raises additional questions about the impact of these fisheries on steelhead and provides an added reason for concern.

We respectfully urge you closely scrutinize the departments' proposal and ensure that any changes to the immediate and long-term release mortality rates for steelhead or other species are supported by legitimate scientific studies on the fishing gears, species, and seasons in question.

Thank you,



Chris Cone, Executive Director
CCA Oregon



Nello Picinich, Executive Director
CCA Washington

CC: Jeromy Jording