

August 27, 2020

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

Chair Carpenter and Commissioners,

We appreciate the opportunity to comment on the Commission's review of Columbia River Salmon Fishery Management Policy (C-3620). We strongly oppose the June 10, 2020 recommendation by the Commission's Columbia River Workgroup (CRW). The CRW proposal would reduce recreational fishing opportunity across the Columbia River basin and restore year-round gillnetting to the mainstem lower Columbia River, which will harm Columbia River salmon and steelhead populations and the communities and businesses that rely on recreational fisheries. We urge the Commission to reject this misguided proposal.

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.

Spring Chinook. The CRW's proposed "abundance-based matrix" would reduce recreational spring Chinook fishing opportunity – above and below Bonneville Dam - by an average of 13.5% and by as much as 19% compared to the State of Oregon's rules. It would return gillnets and "tangle nets" to the mainstem Columbia River for first time since 2016 and even authorizes gillnet fisheries before a run update can confirm that spring Chinook forecasts have materialized.

Summer Chinook. The CRW's proposed "abundance-based matrix" would reduce recreational summer Chinook fishing opportunity – above and below Bonneville Dam - by an average of 11% and by as much as 25% compared to the State of Oregon's rules. It would return gillnets to the mainstem Columbia River for first time since 2016 where they will be allowed to retain wild summer Chinook, which is not permitted in the mark-selective recreational fishery. This is in direct conflict with WDFW's position – including recent comments by senior WDFW staff - that recreational fisheries should be mark-selective to increase the escapement of wild summer Chinook and selectively harvest hatchery fish consistent with federal requirements for hatchery operations.

Fall Chinook. The CRW policy authorizes mainstem gillnetting in Zones 1-3 during the fall, removing a protection in place for ESA-listed Tule fall Chinook, and undermines efforts to maintain hatchery production through the implementation of mark-selective fisheries. The CRW's proposed policy also removes the requirement for monitoring of the Zones 4-5 mainstem gillnet fishery that was in the Commission's 2017 policy, which was intended to quantify the impact of the Zones 4-5 fishery on bycatch species like B-run steelhead.

The CRW policy is a major concern to the hundreds of thousands of recreational anglers and the many businesses that make up Washington’s recreational fishing economy, which stretches from sporting goods retailers, marinas and guides, to tackle manufacturers and boat builders in eastern Washington and beyond. Recreational fishing is an integral part of the economy of Washington’s rural and urban areas, but the CRW policy threatens an industry that is already reeling from drastic salmon fishing closures in Puget Sound, a statewide fishing closure due to COVID-19, and the exclusion of most of the industry from federal relief funds under the CARES Act.

The CRW policy ignores the significant enhancements made to off-channel gillnet harvests - a foundational mitigation element of the bi-state reforms - and threatens to end concurrent management of the Columbia River between the states of Oregon and Washington. The policy also ignores the continued need to transition to fishing methods capable of selective harvest in the mainstem to protect wild salmon and meet federal requirements for maintaining hatchery production.

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.

Sincerely,

Coastal Conservation Association Washington
Northwest Sportfishing Industry Association

Northwest Marine Trade Association
Northwest Steelheaders

Clark Skamania Flyfishers
Congressional Sportsmen's Foundation
Lower Columbia Flyfishers
Puget Sound Anglers East Jefferson Chapter
Theodore Roosevelt Conservation Partnership
Wood Village, Oregon

Coastal Conservation Association – Oregon
Cowlitz Fly Anglers
NW Guides and Anglers Association
Puget Sound Anglers South Sound Chapter
Washington Council Fly Fishers International

24/7 Industries
Active Outdoors
Alexander Investors' Services, LTD
Ancient Mariner Guide Service
Angler's Rendezvous, Inc.
Aspen Power Catamarans
B.S. Fish Tales dba Brad's Killer Fishing Gear
Basta Boatlifts
Bill Monroe Outdoors, LLC

3 Rivers Marine
Alan's Guide Service
Anchor Caddie
Anesthesia Associates Northwest
Applied AR
Atomic Anglers Guide Service LLC
Bake's Marine Consulting
Bentz Tackle
Black Heron Fly Fishing

Blacky's Guide Service Inc
BnR Tackle
Bob's Sporting Goods
Camano Marine
Camp Kalama RV Park
Chris V's Guide Service
Clean Sails
Deschutes Steelheader, Co.
Dock Street Marina
Eagle Cap Fishing Guides
Fahey Ventures
Findlay's Guide Service
Fish Reaper
Fisherman's Marine & Outdoor
Hesters Sportfishing
Hunter-Davisson, Inc.
Its All Good Guide Service LLC
Jim Clark LLC
John's Jigs LL
Kevin Hawkins Fishing
Law Office Of William DeVoe
Legendary Chrome Guide Service
LEO Flashers
Lucas Holmgren Media
Maxima Fishing Line
Myers Woodline Inc
Northwest Fishing Adventures LLC
Northwestern Outdoors
Oregon-Canadian Forest Products Inc.
Pacific Boatland
Paradise Guide Service
Poulsen Cascade Tackle
Reel Time Fishing
Bluebird Ventures LLC
Bob Rees' Fishing Guide Service
Buzz Ramsey Promo
Cameo Home Inspection Services
Catcher Co. dba Smelly Jelly
CircleHook LLC
Denny Construction
DMD Consulting
Double G Guide Service
Ecosystems
Farwest Sports, Inc.
Fish Hunt Northwest (DMI Media Northwest)
Fisheries Supply Company
Harry Bresnahan's Guide Service
Hewes Marine Co., Inc.
Imtra
James L Nicol Guide Service
John Elder Fishing Guide Service
Kalama Spirits and Tobacco
Larry Albert Co
Law Offices of Robert G. Dolton
Leisure Sales
Lockhaven Marina, Inc.
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Ollie Damon's
Outdoor Emporium
Pacific Health
Pautzke Bait Co., Inc.
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Renaissance Marine Group, Inc.

Rich Kelly Financial Services

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SPD&G Advertising

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Team Takedown Guide Service

The Guide's Forecast

Tom Posey Co.

Total Fisherman Guide Service

Washington West Fishing Adventures

Western Fishing Adventures Ltd.

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Yakima Bait Company

CC: Washington Governor Jay Inslee
Oregon Governor Kate Brown
Chair Mary Wahl, Oregon Fish and Wildlife Commission
Director Kelly Susewind, WDFW
Director Curt Melcher, ODFW