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 Marine Trade Association
Northwest Sportfishing Industry Association
Northwest Steelheaders
Clark Skamania Flyfishers
Coastal Conservation Association – Oregon
Congressional Sportsmen’s Foundation
Cowlitz Fly Anglers
Lower Columbia Flyfishers
NW Guides and Anglers Association
Puget Sound Anglers East Jefferson Chapter
Puget Sound Anglers South Sound Chapter
Theodore Roosevelt Conservation Partnership
Washington Council Fly Fishers International
Wood Village, Oregon

24/7 Industries
3 Rivers Marine
Active Outdoors
Alan's Guide Service
Alexander Investors' Services, LTD
Anchor Caddie
Ancient Mariner Guide Service
Anesthesia Associates Northwest
Angler's Rendezvous, Inc.
Applied AR
Aspen Power Catamarans
Atomic Anglers Guide Service LLC
B.S. Fish Tales dba Brad's Killer Fishing Gear
Bake's Marine Consulting
Basta Boatlifts
Bentz Tackle
Bill Monroe Outdoors, LLC
Black Heron Fly Fishing
Blacky's Guide Service Inc  Bluebird Ventures LLC
BnR Tackle  Bob Rees' Fishing Guide Service
Bob's Sporting Goods  Buzz Ramsey Promo
Camano Marine  Cameo Home Inspection Services
Camp Kalama RV Park  Catcher Co. dba Smelly Jelly
Chris V's Guide Service  CircleHook LLC
Clean Sails  Denny Construction
Deschutes Steelheader, Co.  DMD Consulting
Dock Street Marina  Double G Guide Service
Eagle Cap Fishing Guides  Ecosystems
Fahey Ventures  Farwest Sports, Inc.
Findlay's Guide Service  Fish Hunt Northwest (DMI Media Northwest)
Fish Reaper  Fisheries Supply Company
Fisherman's Marine & Outdoor  Harry Bresnahan's Guide Service
Hesters Sportfishing  Hewes Marine Co., Inc.
Hunter-Davisson, Inc.  Imtra
Its All Good Guide Service LLC  James L Nicol Guide Service
Jim Clark LLC  John Elder Fishing Guide Service
John's Jigs LL  Kalama Spirits and Tobacco
Kevin Hawkins Fishing  Larry Albert Co
Law Office Of William DeVoe  Law Offices of Robert G. Dolton
Legendary Chrome Guide Service  Leisure Sales
LEO Flashers  Lockhaven Marina, Inc.
Lucas Holmgren Media  Mack's Lure, Inc.
Maxima Fishing Line  Miller Marine Products LLC
Myers Woodline Inc  North Point
Northwest Fishing Adventures LLC  Northwest Rigging
Northwestern Outdoors  Ollie Damon's
Oregon-Canadian Forest Products Inc.  Outdoor Emporium
Pacific Boatland  Pacific Health
Paradise Guide Service  Pautzke Bait Co., Inc.
Poulsen Cascade Tackle  RB Boats
Reel Time Fishing  Renaissance Marine Group, Inc.
Rich Kelly Financial Services
Shelton's Tree Farm
SPD&G Advertising
Sports Service
Stevens Marine
Team Takedown Guide Service
The Guide's Forecast
Tom Posey Co.
Total Fisherman Guide Service
Washington West Fishing Adventures
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Scott A Kappes Corporation
Smokehouse Products, LLC.
Sportco Warehouse Sporting Goods
Steel Dreams Guide Service
TackleTim
Ted's Sports Center
The Reel News
Tom-n-Jerrys
United Sales Associates
West Coast Auto Enthusiasts
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