

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.”