



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

### **Public Comments received between March 10, 2020 through June 1, 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:** [123ContactForm](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** Contact the Policy Review Workgroup  
**Date:** Wednesday, April 15, 2020 9:46:02 AM

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<b>Name</b>	Blaine ACKLEY
<b>Email</b>	blaineackley@me.com
<b>Address</b>	Hillsboro OR
<b>Comments</b>	IT IS TIME TO REMOVE THE GILLNETS FROM THE Columbia River NOW.
<b>Attachment</b>	

The message has been sent from 73.67.151.84 (United States) at 2020-04-15 12:45:58 on Safari 13.1  
Entry ID: 133

**From:** [123ContactForm](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** Contact the Policy Review Workgroup  
**Date:** Wednesday, April 15, 2020 12:38:30 PM

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<b>Name</b>	Randal Baker
<b>Email</b>	randyb76@gmail.com
<b>Address</b>	CLATSKANIE OR
<b>Comments</b>	<p>If the Columbia River's Salmon, Steelhead, and Sturgeon are in such bad shape. We should shut down the whole system to EVERYONE for a period of 4 years to allow them to recover. Remove any an all sea lions above the Astoria Bridge. I as an avid sports fisherman would be willing to sacrifice my fishing for the good of the species as long as it applies to everyone. Commercial gill netting should be unlawful. As a youth growing up in the Pacific Northwest I have seen the results of these nets and have never approved of them. When ever the nets were in the river, it was like turning off a switch to any fishing.</p>
<b>Attachment</b>	

The message has been sent from 63.142.159.164 (United States) at 2020-04-15 15:38:27 on Chrome 80.0.3987.163  
Entry ID: 135

**From:** [123ContactForm](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** Contact the Policy Review Workgroup  
**Date:** Wednesday, April 15, 2020 10:05:57 AM

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<b>Name</b>	David Wessels
<b>Email</b>	dlwessels@yahoo.com
<b>Address</b>	Ridgefiled WA
<b>Comments</b>	It I ridiculous the Columbia River is closed to sport fishing based on the executive order of Jay Inslee!! As an Oregon license holder for over 40 consecutive years I ask that you reopen the largest river in North America with plenty of room to stay 6 feet apart to the amazing spring salmon fishery we are being deprived of by Jay Inslee's anti sportsman agenda! Golf is still happening, let us fish!
<b>Attachment</b>	

The message has been sent from 174.224.2.135 (United States) at 2020-04-15 13:05:53 on iPhone 13.0.1  
Entry ID: 134



410 B East Main  
Dayton, WA 99328  
phone: 509.382.4115  
www.snakeriverboard.org

April 28, 2020

Kelly Susewind, Director  
Washington Department of Fish & Wildlife  
600 Capitol Way North  
Olympia, WA 98501-1091

Larry Carpenter, Chair  
Washington Fish & Wildlife Commission  
600 Capitol Way North  
Olympia, WA 98501-1091

Dear Mr. Susewind and Mr. Carpenter:

This letter is concerning the Columbia River Policy-3620, geographic allocation of spring Chinook fishing on the mainstem Columbia and Snake Rivers and conservation needs that aren't considered both as part of harvest and not part of harvest. We are aware this potentially was an issue that was going to be addressed as part of the Columbia River Policy Review effort, which is now suspended. We appreciated Washington considering the Board's recommendations provided in our letter dated August 28, 2018. However, all of the justified considerations have been briefly considered through the lens of protecting lower river fisheries and meeting minimum ESA conservation requirements, with the exception of a small increase in upriver spring Chinook allocation (5%). As Washington continues to review the policy to seek eventual concurrence with Oregon, we need more for SE Washington.

Enclosed is one of the documents from that process we would like to bring to your attention. This relates to the distribution geographically of where ESA impacts are allocated, which translates into harvest for that stock. For Spring Chinook, #3, the alternative listed there (4a and 4b) would move 5% of the current ESA impacts from the Lower Columbia River to areas above Bonneville Dam. While that would be a very small positive, incremental step in the right direction to address the imbalance in harvest, it barely "moves the needle".

Whether harvest imbalance is addressed in a re-start of the Columbia River Policy Review at a later date, or in some other forum, we would like to offer our own alternative that would fundamentally provide fairness in the non-treaty harvest of this stock. The present distribution of ESA impacts geographically does not have any rationale to it. We have repeatedly asked staff why ESA impacts are distributed in this manner. We have never received any kind of meaningful answer. We can only interpret this to mean that the current allocation of ESA impacts is arbitrary.

Instead of ESA impacts, **harvest** by geographic region should be the metric used (with ESA impacts distributed accordingly to reflect this). Having harvest be the metric would also reduce the "black box" effect that ESA impacts creates, making the fishery and the decisions made more transparent.

With regard on how to allocate harvest by area, that should be done by where the salmon anglers reside. While imperfect, the best way to measure that would be by tracking historic Columbia River Salmon/Steelhead endorsement sales (CRSSE). Harvest of these fish does not equate to where the state is selling endorsements. Data pertinent to this is as follows:

Current average sport harvest distribution, for 2001-2013:  
Below Bonneville: 87%

Eastside areas:  
Zone 6 (Bonneville to McNary Dam): 8%  
Snake River (WA only): 5%

Sales of the Columbia River Salmon/Steelhead Endorsement (CRSSE) for 2009-2013 are:

Westside Counties: 63%  
Eastside Counties: 37%

We believe a greater consideration needs to be given to conservation, rural economies, and equality.

**Conservation:** “Front end loading” of harvest of the bell curve for returning adults is occurring, instead of throughout the run. If conservation truly is “priority one”, as we have heard WDFW state many times, then spread harvest out over the entire run. We now have a system that consistently overharvests when the run comes in lower than projected. We need to reduce the effect of anglers below Bonneville fishing on “paper fish” (pre-season estimates), while Eastsiders fish on real numbers (counted at the Bonneville Dam fish ladders). Conservation needs greater consideration that just meeting a non-jeopardy ESA take decision by NOAA. To truly manage for meaningful conservation, we need to manage to meet escapement goals that are set to conserve specific populations.

**Rural Economies:** The vast majority of the economic benefits of this fishery are concentrated below Bonneville Dam (for both sport and non-treaty commercial). Also, the relative impact of this fishery can be much higher in the Eastside than for the lower river. For example, 100 spring Chinook caught would mean a substantial boost to the economy of Starbuck, Washington, while it would only be a barely quantifiable benefit to the Vancouver area.

**Equality:** Eastside anglers fail to see how one can defend a system where 37% of the anglers are only allowed 13% of the harvest (or conversely, why should 63% of the anglers get 87% of the harvest). Also, the metric for this fishery should be harvest, not ESA impacts. Using ESA impacts just clouds/confuses the issue to the general public, when harvest figures could readily be used.

To recap, we are asking that an alternative be developed that manages to meet escapement goals to conserve target populations and divides up geographic area by harvest, **NOT** ESA impacts. Harvest should be in proportion to where the salmon angler lies by county of residence. We appreciate your attention to this matter, and look forward to your response.

Sincerely,



Bill Bowles, Chair  
Snake River Salmon Recovery Board

Encl.: Listing of possible changes to 2020, Columbia River policy review

cc:  
Mary Wahl, Chair, Oregon Fish & Wildlife Commission  
Curt Melcher, Director, Oregon Department of Fish and Wildlife  
Ryan Lothrop, Columbia River Policy Coordinator, Washington Department of Fish and Wildlife  
Chris Kern, Deputy Administrator, Marine and Columbia River, Oregon Department of Fish and Wildlife  
Casey Mitchell, Chairman, Columbia River Inter-Tribal Fish Commission

Columbia River Policy Review								
Possible Policy Changes for 2020 and Beyond: Range of Alternatives on the Active list (per Policy Issue or Option) for Analysis <sup>2</sup>								11/18/2019
Policy Issue (or Option)	Alternatives						Status	
	PRC Feb 26, 2019 Recommendation	Current Status Quo <sup>1</sup>	Alternative 1	Alternative 2	Alternative 3	Alternative 4		
<b>Spring Chinook</b>								
1	Recreational/Commercial allocation	70%/30%	80%/20% (OR); 70%/30% (WA)	60%/40%	Abundance-based matrix	65%/35%		Active
2	Allowable mainstem commercial gear	Tangle nets (any period) and gill nets (post update)						Active
3	Allocation of Upriver spring Chinook within recreational fisheries (Bonneville to OR-WA state line/ Snake River)	75%/25% (10%/15%)	75%/25% (10%/15%) (OR; WA)				Alt 4a. 70%/12.5%/17.5% Alt 4b. 70%/10%/20%	Active
5	Allocation of unused commercial impacts	Not addressed	To escapement (OR); No restrictions (WA)	To escapement	No restrictions			Active
6	Allocation of unused recreational impacts	Not addressed	To commercial fishery (OR); Not addressed (WA)					Active
<b>Summer Chinook</b>								
1	Recreational/Commercial allocation downstream of Priest Rapids Dam	70%/30%	80%/20% (OR); 70%/30% (WA)	50%/50%	Abundance-based matrix			Active
2	Allocation of unused commercial impacts	Not addressed			Unused impacts allocated to upriver recreational fisheries or spawning escapement			Active
3	Allowable mainstem commercial gear	Gill net and alternative gear						Active
<b>Fall Chinook</b>								
1	Recreational/Commercial allocation of most constraining fall Chinook impacts	≤70%/≥30%	≤70%/≥30% (OR; WA)		≤65%/≥35%			Active
2	Allowable mainstem commercial gear	Gill net (any Zone), tangle net and seine gear	Gill net (Zone 4/5) and alternative gear (OR); Gill net (any Zone), tangle net and seine gear (WA)					Active
<b>Coho</b>								
2	Allowable mainstem commercial gear	Gill net, tangle net and seine gear						Active
<b>Other Measures</b>								
1	Limitation on recreational fishing guide/charter licenses	Not addressed	No limitations (OR); No guides below Longview Bridge (WA)	Pursue guide license limitations				Active
2	Commercial license buyback program	Not addressed	Not addressed (OR); Pursued (WA)	Pursue gill net license buyback program				Active
3	Hatchery production goals	Not addressed	Not addressed	Include goals and determine process to set goals				Active
4	Increase alternative gear development/implementation	Not addressed	Pound net testing and rule making to legalize pound net and seines (WA)	Include process emphasis				Active

<sup>1</sup> Current Status Quo reflects each state's corresponding policy/rules as of August 1, 2019.

<sup>2</sup> Other alternatives were identified by the PRC and analyzed by staff, but are not listed here as it was placed in a category of "not active for further analysis" by decision of the PRC. The complete list of all alternatives that have been considered is included in another table. For a description of the alternative, its analysis, and the rationale for its deactivation for further analysis, see the documents for each of the PRC meetings to date.

Note: Alternative gear is defined as: Including but not limited to: purse seine, beach seine, tangle net, pound net, or other gears as authorized by the Commissions.

Columbia River Policy Review							
Possible Policy Changes for 2020 and Beyond: Range of Alternatives (per Policy Issue or Option) for Analysis							11/18/2019
Policy Issue (or Option)	Alternatives						
	PRC Feb 26, 2019 Recommendation	Current Status Quo <sup>1</sup>	Alternative 1	Alternative 2	Alternative 3	Alternative 4	
<b>Spring Chinook</b>							
1	Recreational/ Commercial allocation	70%/30%	80%/20% (OR); 70%/30% (WA)	60%/40%	Abundance-based matrix	65%/35%	
2	Allowable mainstem commercial gear	Tangle nets and other alternative gear (any period), gill nets (post update)	Tangle nets (post update) (OR); Tangle nets and other alternative gear (any period), gill nets (post update) (WA)	Non-tangle net alternative gear (any period) INACTIVE			
3	Allocation of Upriver spring Chinook within recreational fisheries (Bonneville to OR-WA state line/ Snake River)	75%/25% (10%/15%)	INACTIVE 75%/25% (10%/15%) (OR; WA)	65%/35% (15%/20%) INACTIVE	85%/15% (5%/10%) INACTIVE	75%/25% (10%/15%), plus 500 fish to Snake River from lower river INACTIVE	Alt 4a. 70%/12.5%/17.5%
							Alt 4a. 70%/10%/20%
4	Provide improved season stability for Upriver spring Chinook recreational fisheries, via: <sup>2</sup>	Not addressed	No stability measures beyond the provisions shown below INACTIVE				
1	License sales	Allocations shown above; lower river fisheries constrained by a 30% pre-run size update buffer; all fisheries constrained by U.S. v OR Catch Balance provision INACTIVE	Allocations shown above; lower river fisheries constrained by a 30% pre-run size update buffer; all fisheries constrained by U.S. v OR Catch Balance provision INACTIVE	Area of license purchase INACTIVE	Area of license residence INACTIVE		
2	Origin of stock			Origin of stock INACTIVE			
3	Lower river buffer only			Lower river buffer only INACTIVE			
4	Upriver season set			Upriver season set INACTIVE			
5	No upriver Catch Balance			No upriver Catch Balance INACTIVE			
6	Lower river 5 days/week			Lower river 5 days/week INACTIVE			
7	Different benefit measure			Different benefit measure INACTIVE			
8	No lower river extension			No lower river extension INACTIVE			

	9	Payback to upriver			Payback to upriver INACTIVE			
	10	Payback to lower river			Payback to lower river INACTIVE			
5	Allocation of unused commercial impacts		Not addressed	To escapement (OR); No restrictions (WA)	To escapement	No restrictions		
6	Allocation of unused recreational impacts		Not addressed	To commercial fishery (OR); Not addressed (WA)				
<b>Summer Chinook</b>								
1	Recreational/ Commercial allocation downstream of Priest Rapids Dam		70%/30%	80%/20% (OR); 70%/30% (WA)	50%/50%	Abundance-based matrix		
2	Allocation of unused commercial impacts		Not addressed	To spawning escapement (OR); to upriver recreational fisheries or spawning escapement (WA) INACTIVE	Unused impacts allocated to spawning escapement INACTIVE	Unused impacts allocated to upriver recreational fisheries or spawning escapement		
3	Allowable mainstem commercial gear		Gill net and alternative gear	Alternative gear (OR); Gill net and alternative gear (WA) INACTIVE				
4	Definition of harvestable surplus below Priest Rapids Dam		Not addressed	U.S. v OR Management Agreement harvest rate schedule INACTIVE	Only if forecast > spawning escapement over Priest Rapids Dam INACTIVE			
<b>Fall Chinook</b>								
1	Recreational/ Commercial allocation of most constraining fall Chinook impacts		≤70%/≥30%	≤70%/≥30% (OR; WA)	≤80%/≥20% INACTIVE Alternative gear only INACTIVE	≤65%/≥35% Gillnets in Z45 INACTIVE		
2	Allowable mainstem commercial gear		Gill net (any Zone), tangle net and seine gear	Gill net (Zone 4/5) and alternative gear (OR); Gill net (any Zone), tangle net and seine gear (WA)	Alternative gear only INACTIVE			
<b>Coho</b>								
1	Recreational/ Commercial allocation		Prioritization by fishery segment INACTIVE	Prioritization by fishery segment (OR; WA) INACTIVE	Numerical allocation INACTIVE			

2	Allowable mainstem commercial gear	Gill net, tangle net and seine gear	Tangle net and other alternative gear (OR); Gill net, tangle net and seine gear (WA) INACTIVE	Non-tangle net alternative gear INACTIVE			
<b>Other Measures</b>							
	Limitation on recreational fishing guide/charter licenses	Not addressed	No limitations (OR); No guides below Longview Bridge (WA)	Pursue guide license limitations			
	Commercial license buyback program	Not addressed	Not addressed (OR); Pursued (WA)	Pursue gill net license buyback program			
	Hatchery production goals	Not addressed	Not addressed	Include goals and determine process			
	Increase alternative gear development/ implementation	Not addressed	Pound net testing and rule making to legalize pound net and seines (WA)	Include process emphasis			

<sup>1</sup> Current Status Quo reflects each state's corresponding policy/rules as of August 1, 2019.

<sup>2</sup> See below for expanded phrasing on Upriver spring Chinook stability issue options

- 1 Use of license sales as the basis for allocation
- 2 Use of origin of stock as the basis for allocation
- 3 Apply buffer only to fisheries below Bonneville Dam
- 4 Establish a set season above Bonneville Dam
- 5 Remove the Catch Balance requirements for fisheries above Bonneville Dam
- 6 Limit lower river seasons to five days per week
- 7 Measure benefit based on harvest instead of economic value
- 8 No lower river extension beyond pre-season plan
- 9 Annual payback to upriver fisheries for lower river fishery overage the year prior
- 10 Annual payback to lower river fishery for foregone opportunity resulting from implementing strategies intended to safeguard upriver fisheries

Note: Note: Alternative gear is defined as: Including but not limited to: purse seine, beach seine, tangle net, pound net, or other gears as authorized by the Commissions.

**From:** [123ContactForm](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** Contact the Policy Review Workgroup  
**Date:** Wednesday, May 20, 2020 3:00:17 PM  
**Attachments:** [SE\\_WA\\_Counties\\_WDFW\\_Commission\\_C3620\\_recomendations\\_May\\_2020 - Final.pdf](#)

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<b>Name</b>	John Foltz
<b>Email</b>	john@snakeriverboard.org
<b>Address</b>	410B E. Main St. Dayton WA
<b>Comments</b>	I was asked to send the attached letter from the Southeastern Washington Counties regarding the Columbia River Basin Salmon Management Policy, Washington Fish and Wildlife Commission Policy C-3620.
<b>Attachment</b>	<a href="https://www.123formbuilder.com/upload_dld.php?fileid=e1a0fc96933942dc3a216169d41ba491">https://www.123formbuilder.com/upload_dld.php?fileid=e1a0fc96933942dc3a216169d41ba491</a>

The message has been sent from 68.186.87.61 (United States) at 2020-05-20 18:00:12 on Firefox 75.0  
Entry ID: 136

April 28, 2020

Kelly Susewind, Director  
Washington Department of Fish & Wildlife  
600 Capitol Way North  
Olympia, WA 98501-1091

Larry Carpenter, Chair  
Washington Fish & Wildlife Commission  
600 Capitol Way North  
Olympia, WA 98501-1091

Dear Mr. Susewind and Mr. Carpenter:

The Commissioners from Asotin, Columbia, Garfield, Walla Walla, and Whitman Counties would like to extend support for the letter from the Snake River Salmon Recovery Board dated April 28, 2020 regarding the Columbia River Basin Salmon Management Policy C-3620. We appreciate the Commissions review of the Snake River Board's previous recommendations provided in 2018, recommendations also supported by the Counties of Southeastern Washington. However, as Washington continues to review the policy to seek eventual concurrence with Oregon, we need more for Southeastern Washington.

Southeastern Washington Counties benefits directly from Snake River spring Chinook fisheries and each county has a voting member on the Snake River Salmon Recovery Board. For over the past ten plus years we have been attending spring Chinook fisheries meetings and sending letters regarding the lack of fisheries in southeastern Washington.

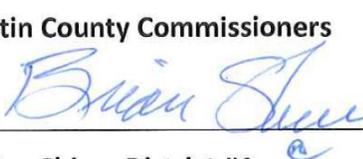
We fully support the specific recommendations in the Snake Board letter and the need for increased consideration for conservation, rural economies, and statewide equity in the policy. We believe that these recommendations do not negatively impact the other guiding principles. RCW 77.040.012 mandates that the Commission maximize public recreational fishing and hunting opportunities for all citizens. As County Commissioners we have not observed the current spring Chinook allocation splits as providing all citizens, regardless of geography, equitable recreational fishing opportunities for Columbia River spring Chinook salmon.

Sincerely,

The Counties of Southeastern Washington

CC: Mary Wahl, Chair, Oregon Fish & Wildlife Commission  
Curt Melcher, Director, Oregon Department of Fish and Wildlife  
Ryan Lothrop, Columbia River Policy Coordinator, Washington Department of Fish and Wildlife  
Chris Kern, Deputy Administrator, Marine and Columbia River, Oregon Department of Fish and Wildlife  
Casey Mitchell, Chairman, Columbia River Inter-Tribal Fish Commission  
John Foltz, Executive Director, Snake River Salmon Recovery Board

Asotin County Commissioners

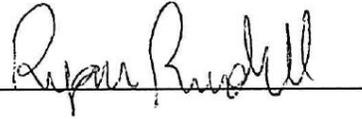


Brian Shinn, District #1

Chris Seubert, District #2

VACANT, District #3

Columbia County Commissioners



Ryan Rundell, District #1



Michael Talbott, District #2



Charles Amerein, District #3

Garfield County Commissioners



Robert K. Johnson, District #1



Justin Dixon, District #2



Wynne McCabe, District #3

Walla Walla County Commissioners



Jim Johnson, District #1



Todd Kimball, District #2



Greg Tompkins, District #3

Whitman County Commissioners



Art Swannack, District #1



Dean Kinzer, District #2



Michael Largent, District #3

**From:** [123ContactForm](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** Contact the Policy Review Workgroup  
**Date:** Tuesday, May 26, 2020 10:53:26 AM  
**Attachments:** [Bonneville Dam site08122019.docx](#)

<b>Name</b>	Irene Martin
<b>Email</b>	i7846martin@gmail.com
<b>Address</b>	Skamokawa WA
<b>Comments</b>	<p>Testimony of Irene Martin, Policy Work Group, May 27, 2020. Columbia River Salmon Fishery Management Policy. P.O. Box 83, Skamokawa, WA 98647. 360-795-3920. I7846martin@gmail.com</p> <p>In reading the draft revision of Policy C3620, I am very pleased to see a new emphasis on hatchery production and mitigation for permanent habitat losses that occurred on the Columbia River during the dam-building era. I suspect the general public is not really aware of just how much habitat was destroyed during that period. To begin with, the mainstem Columbia itself had large spawning areas which produced enormous amounts of salmon. It also had rearing areas, as well as refuges near its many islands where salmon could shelter. For the most part, this habitat was flooded out during the dam-building era. Hatcheries were introduced in order to mitigate for this damage and compensate those who depended upon salmon for their livelihoods, food and ceremonial purposes. For the benefit of those who are not familiar with the habitat of the pre-dam Columbia, I have attached a photograph with my testimony.</p> <p>Over the past 2-3 decades, however, there has been a retreat from rearing salmon in hatcheries for a variety of reasons, including declining funding, a desire to focus on wild fish recovery, surplus salmon hatchery salmon spawning and competing with wild/natural spawn salmon on spawning beds, and large surpluses returning to hatcheries uncaught, an economic loss. It is estimated that hatcheries are producing 170 million fewer smolts today than in 1992. Washington is using approximately 37% of its hatchery capacity currently. Unfortunately, this massive decline in salmon production has resulted in unintended consequences. The presence of hatchery fish diluted the wild fish, which enabled predators such as orcas and other marine mammals to find sufficient food for their survival without undue impact on wild stocks. The decline in hatchery production has inevitably resulted in increased predation on the remaining wild fish, so that their recovery is imperiled, as well as that of the orcas. The decline in production has also resulted in allocation struggles among user groups as the “pie” has grown smaller, resulting in a decline of the gillnet fishery that served to remove much of</p>

the hatchery surpluses before damage to wild runs in the tributaries. These allocation battles and declines in commercial fishing in turn have exacerbated social issues in fish-dependent communities, particularly in the lower Columbia and along the coast, with rising negative social statistics ranging from juvenile suicide rates to increased drug and alcohol abuse.

I have testified on the social issues among the commercial fishing fleet and lower Columbia communities many times over the past two decades. I believe that refocusing Policy C3620 towards enhanced production and the mitigation that is owed due to permanent habitat loss is a major positive step towards revitalization of all fisheries, commercial, tribal and recreational. But without an inriver commercial gillnet fishery to deal with potential surpluses, it will be difficult to justify what are known as “lost opportunity costs,” costs that arise when little to nothing in the way of economic returns are realized from a foregone resource. Thank you.

**Attachment**

[https://www.123formbuilder.com/upload\\_dld.php?fileid=29b8d6d3783a740b723815f48d6552bf](https://www.123formbuilder.com/upload_dld.php?fileid=29b8d6d3783a740b723815f48d6552bf)

The message has been sent from 98.158.1.244 (United States) at 2020-05-26 13:52:53 on Chrome 81.0.4044.138  
Entry ID: 138



**From:** [123ContactForm](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** Contact the Policy Review Workgroup  
**Date:** Tuesday, May 26, 2020 10:36:36 AM  
**Attachments:** [Bonneville Dam site08122019.docx](#)

<b>Name</b>	Kent Martin
<b>Email</b>	i7846martin@gmail.com
<b>Address</b>	Skamokawa WA
<b>Comments</b>	<p>Columbia River Salmon Fishery Management Policy . Comments on Pre-Decisional draft. By Kent Martin, P.O. Box 83, Skamokawa, WA 98647. 360-795-3920. I7846martin@gmail.com. May 26, 2020.</p> <p>These comments are informed in no small measure by a recent (5/20/20) Compact hearing on additional recreational fishing, a proposed 5 day season, and a one time, 9 hour tangle net fishery in Zone 5 for Spring Chinook. Neither fishery was approved, as most were not in favor. Once again, sports groups framed the debate as one of gillnets and betrayal of the recreational fishery. Once again, Oregon and Washington staff acquiesced instead of putting the policy's post-update harvest opportunity and the science front and center regarding short nets, short soak times and recovery boxes, as integral to alternate gear. The diatribes were all about gillnets, not the few hundred fish we were projected to catch. In another venue, one could have easily substituted the word "anthrax" for gillnets. I heard no awareness by the testifiers that there are any areas "where policy purpose or expectation was not met." (Pre-decisional Draft p. 3) and the recreational leadership that does know will not speak up.</p> <p>I heard bitter complaining over the need to raise more fish. Very few seem to see the Catch 22 here in that large over-escapements produce better sport fishing but at a considerable cost in terms of hatchery surpluses, hatchery strays and lost economic opportunities to lower Columbia communities. The same can be said for healthy natural populations, such as LRW, URB chinook. Do we need 200,000 returns to the Hanford Reach or even half of that? Clearly, the balance between successful fisheries and the cost to society in terms of rearing costs and continuing constraints on water and habitat needs to be articulated. I don't doubt for a moment that the industrial sector is looking at those costs. Keeping this homily in mind, I would suggest that a caveat be added to Guiding Principles no. 5 on p. 4, that increased hatchery production needs to be congruent with provisions to harvest the abundance.</p> <p>Item 3 on p. 5 speaks to providing incentives to the commercial fishery to "develop, promote and implement alternative gear and techniques." I think this needs to be more</p>

explicit. From recent experience, fishermen are very wary of investing more time and money into alternative technologies only to find sales are restricted to marked tules and a relative handful of marked coho. We need to develop harvest goals, and not just operate as a garbage detail.

Judging from personal conversations with staff, both states now recognize that much of recreational leadership, though not all, has no intention of countenancing any commercial harvest of any kind on the mainstem Columbia. It would be nice to have them on board but at present I would be inclined to the belief that they would seek to ensure that any alternative gear would not be economic. As a fisherman recently said at an alternative gear workshop, "They aren't going to go along with anything that catches fish." As such I would feel more comfortable deleting representation from the recreational sector in alternative gear discussions.

pp. 6-7, item b. I suggest including language on pages 9 and 11 regarding providing additional hatchery fish for expansion of winter and summer seasons. I don't see a downside here, but maybe I'm missing something. I support the 70/30 allocation split for mainstem fisheries, if for no other reason than I do not think we can get any more. The question remains: "With the split of impacts can the abundances be harvested, or will unacceptable surpluses occur?"

p. 7, no. 3. Commercial Fishery Licenses Reduction Program. We note that the commercial fishery license reduction program suggests working with representatives of the recreational fishery sectors. There is very little interest at this point in the commercial fleet in favor of working with recreational fishery sectors on this topic. Further, these are our businesses, and it should be up to the owners of the businesses as to how they dispose of them. Moreover, in no. 4 on p. 7, pertaining to a limited license program for guides, there is no commercial fishery sector input mentioned. These two sections are inconsistent. Would suggest that commercial fisheries work on their own buyback, and guides work on their own. We believe that much more progress will be made that way, and that if either group chooses to invite members of the other group to join them, that should be their decision to make at the time.

p. 8, Item 5, Scientific monitoring. This addresses the need for "studies of catch and release mortalities where significant uncertainty exists in current estimates in either commercial or recreational fisheries, if funding is available." Now that 70% to 80% of the critical stock impacts have been allotted to the recreational fishery, I believe there is a potential for a significant conservation issue here. In view of the current budgetary constraints, we recommend an in-depth literature review of studies of recreational catch and release mortalities

on the west coast to provide a good baseline in the short term, and a foundation for future studies. Both Alaska and British Columbia have done a number of studies on this subject. Collecting and summarizing that information in a literature review would provide a foundation for WDFW to access funding for further research.

p. 10. I am not sure of the language regarding mainstem commercial coho fisheries. They do not bite that well in the mainstem but there are popular recreational fisheries in the tributaries. Perhaps the language assures us a mainstem coho fishery in all but very poor years. I'd like something that addresses a target October coho fishery.

Specifics

p. 1. Purpose. Line 2, insert word "recovery" after conservation. I think this needs to be brought up as much as possible.

p. 4. Conservation, Recovery, Protection and Perpetuation of Columbia River Salmon. Section 5. We have inserted a photo of the Columbia River before dams were constructed, as an indication of what the habitat was like before it was permanently lost.

p. 5 Top of page, no. 4. Suggest rephrasing this to read "Integrate the use of new alternative commercial gear in the mainstem Columbia River in a manner that maintains an economically viable commercial fishery, and orderly commercial and recreational fisheries in the C.R. and its tributaries."

p. 5 Under Maintaining, Enhancing and Optimizing...no. 1. We are in agreement regarding the baseline years being 2010, 2011, 2012.

p. 6 a. We note that in the first sentence re commercial fishing gear, the Dept. is to work with commercial and recreational fishers to develop alternative commercial gear. The same is expressed in Sec. b. We see no benefit in the recreational fishery participating in this endeavor, and plenty of drawbacks in terms of the amount of time and effort it will take to educate recreational fishers in the basics of commercial fishing gear and the economics of commercial fishing.

p. 7 Suggest you delete the SAFE area blue highlighted material. The production has ranged all over the map, and needs considerable revamping to be more effective.

p. 10. Fall Chinook Salmon, no. 2. It is premature to include seine gear for chinook as appropriate testing and an assessment of economic viability have not been done.

Coho salmon, no. 2. It is premature to include beach seine and purse seine gear as allowable for a coho fishery, as appropriate testing and an assessment of economic viability have not been done.

Chum Salmon. Last sentence is incomplete. There is no retention of chum salmon in either recreational or commercial

fisheries.

The Columbia River, pre-dam era

**Attachment**

[https://www.123formbuilder.com/upload\\_dld.php?fileid=8b8bae12cfd6c1179e76581375b8ba60](https://www.123formbuilder.com/upload_dld.php?fileid=8b8bae12cfd6c1179e76581375b8ba60)

The message has been sent from 98.158.1.244 (United States) at 2020-05-26 13:36:32 on Chrome 81.0.4044.138  
Entry ID: 137



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**From:** Steve Manlow <[smanlow@lcfwb.gen.wa.us](mailto:smanlow@lcfwb.gen.wa.us)>

**Sent:** Monday, June 8, 2020 4:05 PM

**To:** Commission (DFW) <[COMMISSION@dfw.wa.gov](mailto:COMMISSION@dfw.wa.gov)>; Kloepfer, Nichole D (DFW) <[Nichole.Kloepfer@dfw.wa.gov](mailto:Nichole.Kloepfer@dfw.wa.gov)>

**Cc:** John Foltz ([john@snakeriverboard.org](mailto:john@snakeriverboard.org)) <[john@snakeriverboard.org](mailto:john@snakeriverboard.org)>; Neatherlin, Erik (GSRO) <[erik.neatherlin@gsro.wa.gov](mailto:erik.neatherlin@gsro.wa.gov)>

**Subject:** FW: Recommendations on Draft Columbia River Salmon Fishery Management Policy C-3620 Language Update

Nikki:

After I sent our recommendations on the Columbia River Fish Policy language update on May 28, I realized the Word version may not have highlighted our comments in the margins. In this .pdf version, I both highlighted the text we suggest be changed (orange) and expanded the margin to show our comments. It is a bit easier to read. Can you please make sure the Commission members receive this version?

Also, I want to let the Commission know that my Board is submitting comprehensive comments on the draft Hatchery Policy C-3619 update process this week. Please let me know if you have any questions.

Thanks!

*Steve Manlow*

*Executive Director  
Lower Columbia Fish Recovery Board  
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**From:** Steve Manlow

**Sent:** Thursday, May 28, 2020 7:55 PM

**To:** Commission (DFW) <[COMMISSION@dfw.wa.gov](mailto:COMMISSION@dfw.wa.gov)>

**Cc:** Kloepfer, Nichole D (DFW) <[Nichole.Kloepfer@dfw.wa.gov](mailto:Nichole.Kloepfer@dfw.wa.gov)>; Peterson, Laurie L (DFW) <[Laurie.Peterson@dfw.wa.gov](mailto:Laurie.Peterson@dfw.wa.gov)>; Warren, Ron R (DFW) <[Ron.Warren@dfw.wa.gov](mailto:Ron.Warren@dfw.wa.gov)>; Glaser, Bryce G (DFW) <[Bryce.Glaser@dfw.wa.gov](mailto:Bryce.Glaser@dfw.wa.gov)>; Lee, Kessina (DFW) <[Kessina.Lee@dfw.wa.gov](mailto:Kessina.Lee@dfw.wa.gov)>; John Foltz ([john@snakeriverboard.org](mailto:john@snakeriverboard.org)) <[john@snakeriverboard.org](mailto:john@snakeriverboard.org)>; Steve West <[swest@lcfrb.gen.wa.us](mailto:swest@lcfrb.gen.wa.us)>; Todd Olson ([todd.olson@pacificorp.com](mailto:todd.olson@pacificorp.com)) <[todd.olson@pacificorp.com](mailto:todd.olson@pacificorp.com)>

**Subject:** Recommendations on Draft Columbia River Salmon Fishery Management Policy C-3620 Language Update

Washington Fish and Wildlife Commissioners Mclsaac, Graybill and Kehoe:

I want to thank you for the opportunity to testify at yesterday's Fish Committee meeting. After my public testimony, you had requested that I put my comments and suggested edits to the working draft Policy C-3620 update document in writing. Attached for your consideration is a "track changes" format document that captures the LCFRB's comments and suggested edits. We look forward to engaging as this process moves forward.

If you have any questions or need additional information, please feel free to contact me.

Thank you.

*Steve Manlow  
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*The document below is the result of the Columbia River Salmon Fishery Policy Workgroup (CRW) meeting on March 11, 2020. It represents a working draft of language revisions to Commission Policy C-3619 to be considered by the CRW at their May 27, 2020 meeting.*

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## **COLUMBIA RIVER SALMON FISHERY MANAGEMENT POLICY**

### **WASHINGTON WILDLIFE COMMISSION**

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*Sections Outline:*

**Purpose**

**Authority Definition and Intent**

**General Policy Statement**

**Guiding Principles**

**General Provisions**

**Fishery Specific Provisions**

- Spring Chinook Salmon**
- Summer Chinook Salmon**
- Sockeye Salmon**
- Fall Chinook Salmon**
- Coho Salmon**
- Chum Salmon**

**Adaptive Management Provisions**

**Delegation of Authority**

*The draft language below follows the headers above, which is essentially the organization as in the original Policy C-3620. With the exception of the Fishery Specific Provisions section containing allocation and allowable commercial gear provisions, some of the language below is identical or essentially equivalent to language in the 2013 policy document. However, the black font language in these sections contain some new language and intentional omissions of 2013-adopted language resulting from discussions during the 2019 Joint-State Columbia River Policy Review Committee process, as well as discussions at the March 11, 2020 Columbia River Workgroup meeting. The language in the Fishery Specific Provisions section are the provisions adopted by the Commission in March 2019; new staff analysis prepared for the May 27, 2020 CRW meeting will inform discussion of possible changes to these provisions. Language in red font is new draft language not reviewed at the March 11, 2020 CRW meeting, or represents prompts for CRW discussion at the March 27, CRW meeting.*

**Purpose**

The over-arching purposes of this Policy is to guide management of Columbia River non-Tribal fisheries in a manner that achieves **recovery, conservation, protection, and** perpetuation goals for Columbia River salmon and steelhead; to maintain and enhance the economic well-being, and geographic stability of the recreational and commercial fishing industries; and to conduct orderly fisheries in waters in which the states of Oregon and Washington have concurrent jurisdiction.

**Authority Definition and Intent**

This Policy is established by the Washington State Fish and Wildlife Commission, and is applicable to the management by the Washington State Department of Fish and Wildlife (Department) of Pacific salmon and steelhead (spring Chinook, summer Chinook, fall Chinook, sockeye, chum, coho, summer steelhead and winter steelhead) non-Tribal fisheries in the mainstem of the Columbia River and the Snake River downstream of Lower Granite Dam.

**The intent of this Policy is to provide direction, positions, strategies, goals, and actions to the Department to achieve the stated purposes of the Policy. Further, the intent of this Policy is to be responsive to the comprehensive review of Columbia River**

**Commented [s1]:** General comment: This document would benefit greatly by adding rationale for the recommend policy language changes, either here, or in a separate document. Without it, it is difficult to understand the basis for the Committee's suggested updates, relative to what was learned during the policy review process to date. The rationale for changes relating to hatcheries should also be discussed in the context of the hatchery policy and science review.

**Commented [s2]:** Including the term "recovery" draws a clear and distinct connection to achieving recovery goals established in NOAA-adopted recovery plans. Conservation, protection and perpetuation are all elements of recovery implementation, but alone do not establish the clear connection to recovery plan goals as an overarching purpose.

salmon fishery management policies in place during 2013-17<sup>1</sup>. The result of this review included identifying several areas where a policy purpose or expectation was not met. Additionally, adaptive actions by both the Washington and Oregon Commissions in 2017 resulted in areas where concurrency would not be in place as of January, 2019. *{Consider deleting this sentence originally in the draft joint-State document and it appears out of place and awkward}*. While many of the provisions of this policy document are identical or equivalent to policy provisions adopted by the Commission in 2013, the provisions described in this policy document deliberately and fully supersede the policy directives of the policy adopted in 2013.

### General Policy Statement

This policy provides the Department with a cohesive set of guiding principles, strategies and actions to improve the fishery management and abundance of wild and hatchery produced salmon and steelhead in the Columbia River basin. *In implementing this strategy, the Department will promote the conservation and recovery of wild salmon and steelhead and provide fishery-related benefits by maintaining orderly fisheries and by increasingly focusing on the harvest of abundant hatchery fish. The Department will seek to implement mark-selective salmon and steelhead fisheries, or other management approaches that are at least as effective, in achieving spawner and broodstock management objectives.* Fishery and hatchery management measures should be implemented as part of an “all-H” strategy that integrates hatchery, harvest, hydro-system and habitat actions designed to increase the abundance of Columbia River salmon and steelhead. Although this Policy focuses primarily on fishery management and includes direction on hatchery production, this Policy in no way is meant to diminish the significance of habitat and hydro-system protection and restoration. Rather, this Policy explicitly supports additional minimization of hydro-system related fish mortality and further protection and restoration of salmon and steelhead habitat throughout the Columbia River basin.

It is acknowledged there is uncertainty in how and when the strategies and measures described in this Policy will achieve the stated purposes, such as the development and implementation of alternative selective fishing gear, securing funding for enhanced hatchery production, consideration of a commercial license buyback program, and a recreational fishery guiding license limitation. It is also recognized that there are likely to be unpredictable challenges to successful achievement of the intent of various strategies and measures, including such matters as changes in the environmental conditions that affect salmon steelhead abundance, rates of recovery of depressed wild populations, and the effectiveness of habitat restoration and population reintroduction initiatives. Consequently, management decisions must be informed by fishery and stock status monitoring and should be adaptively modified as necessary to meet the stated purposes of this Policy, in accordance with the flexibility intended by the adaptive management provisions of this Policy.

The Department will work collaboratively with its governmental partners to strive to achieve the Policy purposes and implement the policy guidelines and strategies. The Department will work with the Oregon Department of Fish and Wildlife (ODFW) and the Columbia River Treaty Tribes in a manner that is consistent with *U.S. v. Washington*

**Commented [s3]:** 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 of returns), ongoing challenges with reducing pHOS, and the need to intercept more hatchery fish in fisheries.

**Commented [s4]:** The LCFRB strongly supports this. Consider adding “predation” as well.

Agenda Item 3

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<sup>1</sup>Washington Policy C-3620 was reviewed in the report “Comprehensive Evaluation of the Columbia River Basin Salmon Management Policy C-3620, 2013-17” (Bill Tweit, Ryan Lothrop, and Cindy LeFleur, November 2018, 204 p.).

and *U.S. v. Oregon* and other applicable state and federal laws and agreements; with the National Marine Fisheries Service to achieve compliance with the Endangered Species Act (ESA) **and achievement of recovery plan goals** in a manner that optimizes the strategies and actions described in this Policy; with other Federal, State, and Tribal agencies with authority and responsibility for Columbia River salmon, including the Northwest Power and Conservation Council, US Fish and Wildlife Service, Columbia River non-Treaty Tribes, Idaho Department of Fish and Game; and **with all other entities with authorities collateral with the purposes of this Policy.**

**Commented [s5]:** Recommended addition: Complying with ESA take limitations and thresholds is fundamentally not the same as working proactively to achieve NOAA-adopted recovery plan goals and associated targets.

**Commented [s6]:** We encourage improved coordination with Washington's legislatively established recovery regions.

### Guiding Principles

The Department will apply the following principles and policy positions as guides and directives toward achieving the purposes of the Policy.

#### Conservation, Protection, and Perpetuation of Columbia River Salmon

1. Promote the recovery of Endangered Species Act (ESA) listed populations of salmon and steelhead in the Columbia River and ensure that fisheries and hatcheries are operated in a manner consistent with the provisions of the ESA, **and are supportive of achieving recovery plan goals.**
2. Promote the conservation of non-ESA listed wild stocks by adopting spawning escapement goals or other management measures and managing fisheries to achieve those goals or set limits on fishery incidental take allowances when spawning escapement goals have not been established or cannot be achieved. *{Discuss where in WA are there not biologically-based spawning escapement goals for non-listed populations and whether they reflect the MAFAC/NMFS adopted values}.*
3. Advocate for increased downstream and upstream survival of salmon and steelhead through the Columbia River hydro-power system.
4. Advocate for salmon and steelhead habitat protection and recovery, including reducing predation on sensitive stocks by marine mammals, birds, and fish in areas and situations of particular vulnerability.
5. Advocate for increased **hatchery production habitat productivity and capacity improvements to offset for** unmitigated loss of salmon and steelhead production associated with permanently lost or impaired habitat *{added}* due to the construction of dams or other human-caused permanent habitat losses, **in a manner that avoids or grossly minimizes genetic and ecological impacts to wild salmon and steelhead populations.**

**Commented [s7]:** Recommended addition: As noted above, complying with ESA provisions is not the same as working to achieve recovery goals. The ESA provisions are aimed at operating fisheries with take limitations, avoiding jeopardy, and protecting weak stocks, but are not equivalent to managing fisheries to promote achievement of population scale recovery goals. While the two are related, they are not synonymous and warrant distinction.

**Commented [s8]:** Recommended strikeouts and additions: Rather than advocating for more hatchery production to offset unmitigated impacts from permanently lost or impaired habitat, which can conflict with recovery needs for many populations in the Lower Columbia, we recommend focusing mitigation on substantively improving productivity and capacity of existing habitat in a manner that supports recovery of natural origin populations. This is a more ecologically sustainable, longer term solution that avoids exacerbating the impacts associated with hatchery production increases. Currently, we are only addressing about 14% of documented habitat restoration needs on a statewide basis.

#### Orderly and Concurrently Regulated Fisheries

1. Through the Columbia River Compact and as appropriate in other forums dealing with fishery regulatory matters, strive to adopt regulations that are maximally concurrent in the joint waters of the Columbia River.
2. Non-Tribal fisheries shall continue to be managed to meet the terms of *U.S. v. Oregon* management agreements with Columbia River Treaty Tribes.

3. The Department shall continue to meet Colville tribal subsistence and ceremonial needs consistent with agreements with the Confederated Tribes of the Colville Reservation, as well as providing the Wanapum Band of Sokulk Indians a fishing opportunity consistent with Washington RCW 77.12.453.
4. Integrate the use of new alternative commercial gear in the mainstem Columbia River in a manner that maintains orderly commercial and recreational fisheries in the Columbia River and its tributaries.

Maintaining, Enhancing, and Optimizing the Economic Well-being and Stability of Recreational and Commercial Fisheries

1. In a manner that is consistent with **recovery and conservation goals** and does not impair the resource, seek to enhance the overall economic well-being and stability of Columbia River recreational and commercial fisheries in comparison to that yielded by the policies in place in the three years prior to the harvest reform policy provisions that began in 2013.
2. Acknowledging the variability of salmon runs through time and the conservation mandate of this Policy, seek to provide the maximum fishery stability and predictability possible for fishery-dependent local communities.
3. Develop and implement alternative selective-fishing gear and techniques for commercial mainstem fisheries in a manner that facilitates achieving conservation goals as well as enhancing and optimizing economic benefits to commercial and recreational fisheries. **Provide incentives to commercial fishery participants to develop, promote, and implement alternative gear and techniques.**
4. Work with the ODFW to maintain and enhance Select Area production of hatchery fish to support off-channel commercial fishing, but strive to improve the access of these fish to Washington fishing license holders and buyers in recognition of the allocation shift that occurred in 2013 coincident with an emphasis on off-channel fishing.

**Commented [s9]:** Recommended additions to explicitly ensure consistency with established recovery plan goals.

**General Provisions**

The Department will implement the following actions to promote the achievement of the purposes of this policy.

1. Development and Implementation of Alternative Commercial Fishing Gear. The Department shall work towards the goal that commercial fishing gear being used on the mainstem Columbia River optimize conservation and economic benefits. The Department shall pursue the development and, as appropriate, implementation of commercial fishing gear alternatives to the gears currently authorized in non-treaty mainstem commercial fisheries. This should be done in a manner that seeks to improve on the catches of target species and stocks in comparison to the mortality of non-target species and stocks, in an economically efficient manner across the commercial fishery infrastructure segments. The development and implementation process shall include the following actions.

- a. The Department will work with representatives of the commercial and recreational fishing industries to develop recommendations on the development and implementation of commercial fishing gear that will increase the selectivity potential of commercial fisheries compared to current capabilities, and/or promote state conservation objectives (i.e. controlling hatchery fish on spawning grounds). Important objectives of this effort include gaining broad support from the commercial fishing industry, encouraging creative innovation from the commercial fishing industry, and complimenting the economic potential and stability of the commercial fishery while minimizing impacts to mainstem and tributary recreational fisheries. The Department shall consider options that provide economic and other incentives for participants to become involved in alternative gear fisheries.
- b. The Department shall seek funding, as appropriate, to support efforts to develop and implement alternative gears, and work with partners as appropriate to experiment with alternative gear, conduct any necessary studies (in such areas as release mortality, stock compositions, and economic viability), and otherwise facilitate the development of options for alternative gear use. Assessment of alternative gear types in comparison to current gear should include at least catch rates, release mortality rates and overall mortality effects on relevant stocks, economic value, and effect on the commercial fishery infrastructure as a whole. It should also be informed by perspectives from commercial and recreational fisheries.

The Department shall update the Commission annually on progress on the above policy actions. The Commission will consider authorizing any successful alternative commercial fishing gears through rule-making in a manner that takes into account allocations and concurrent regulations with Oregon.

- 2. **Hatchery and Natural Production Goals.** **The Department shall work towards the general goal to increase hatchery and natural production salmon and steelhead in the Columbia River basin, in a manner consistent with recovery of ESA-listed natural origin populations, for the purpose of perpetuating a magnitude of abundance more consistent with historic abundance. It is also important to identify short- and long-term hatchery and natural-origin full production goals for individual populations and population aggregates where possible. The Department will pursue achieving these goals consistent with the following provisions.**

- a. **The Department shall continue to lead in efforts to increase naturally produced salmon and steelhead from increased survival from the effects of the Columbia River hydro-power system and improvements in the quality and quantity of salmon and steelhead habitat.**
- b. The Commission recognizes the importance of **properly managed** hatchery production in meeting Columbia Basin mitigation responsibilities, supporting conservation and recovery efforts, supporting tribal and non-tribal fisheries, and providing ecological benefits such as forage for dependent marine animals and marine nutrient transfers. **Hatchery production is to be conducted in a manner consistent with the**

**Commented [s10]:** Introducing an entirely new hatchery section to this policy represents a major policy shift that warrants extensive public review, and examination in relation to the conclusions of the WDFW/WSAS science review.

**Commented [s11]:** Historic hatchery production at times exceeded modeled historic natural origin production from the basin as a whole, and was a key limiting factor identified by NOAA as contributing to the ESA listings. Without more context, we are uncertain what "historic abundance" refers to here. If this means working toward historic hatchery production levels that contributed to listings, that could be problematic from a recovery perspective, despite gains in hatchery reform to date. The broader goal should be to reestablish healthy, harvestable, and self-sustaining populations of natural origin salmon and steelhead. This would better align with NOAA-approved recovery plans.

Although there is a reference under "b" to ensuring consistency with ESA listed wild fish recovery, in general this new section broadly advocates for hatchery production increases for a variety of reasons. The efficacy of this should be evaluated in the context of the results of the WDFW and WSAS science review that highlight the gaps with our current ability to properly evaluate both genetic and ecological impacts from hatchery production, as well as the need to more carefully consider impacts associated with program size relative to habitat carrying capacity. This is complicated by the Commission's decision to suspend use of the HSRG standards for hatchery management evaluation. Absent a robust approach for objectively evaluating hatchery impacts and benefits, calling for somewhat broad increases in hatchery production seems premature.

**Commented [s12]:** We support this statement.

recovery of ESA-listed wild

populations, the sustainability of healthy wild populations, and in accordance with the Commission policy on hatchery operations. In a manner consistent with the above policy positions, the Department shall advocate for stability of current levels of hatchery produced salmon and steelhead in the Columbia River basin and increases where possible. The Department shall consider ~~seek increases in hatchery production where full mitigation of losses from human-caused uses has yet to occur,~~ to accommodate initiatives to provide additional prey to endangered Southern Resident Killer Whales, and where appropriate, enhancement of Select Area and other fisheries. However, enhanced hatchery production of salmon and steelhead shall be done in areas and with strategies that avoid or strongly minimize negative genetic and ecological effects on wild populations.

- c. In establishing hatchery and natural population goals, the Department shall consider the policy guidance described above, goals described in the NMFS sponsored Columbia Basin Partnership Task Force report, goals and targets established in NOAA adopted recovery plans, goals adopted by the Northwest Power and Conservation Council, and additional information, initiatives, and recommendations that evolve over the course of this Policy.

- i. The 2020 hatchery production goals for release in Select Area fisheries are as follows. {Is this just Youngs Bay?}

Spring Chinook: 3.7 M smolts

Fall Chinook: 1.0 M smolts

Coho: 5.255 M smolts

*{Keep or delete the blue highlight?}*

- 3. Commercial Fishery License Reduction Program. The comprehensive review of Policy C-3620 from 2013 – 2017 noted a low level of progress towards the commercial fishery license buyback program advocated by policy intent in 2013. The Commission recognizes that a fully effective program to buyback commercial fishery licenses would need to be implemented by both Oregon and Washington, that statutory changes may be required in one or both States, and that there are many difficulties in designing a concurrent and equitable program. The Department shall work with members of the commercial fishing industry, representatives of the recreational fishery sectors and the ODFW to develop workable objectives and options for a possible commercial license buyback program. The Department shall then strive to convene a policy level joint-State body with appropriate Oregon representatives to develop a report on alternatives for an effective program that is to be submitted to the Washington and Oregon Fish and Wildlife Commissions for consideration and, if warranted, possible transmission to statutory authorities.
- 4. Limiting the Number of Recreational Guide Licenses in Jointly Managed Waters of the Columbia River. The Commission is aware of public concerns that the lack of a limit on the number of recreational guide licenses issued in Washington and

**Commented [s13]:** We support inclusion of this statement.

**Commented [s14]:** Before advocating in this policy for stability of current or increased levels of hatchery produced salmon and steelhead, at least for the Lower Columbia, WDFW should conduct a thorough analysis of existing production levels to determine whether they are consistent with ESA recovery needs, and whether they align with established population-scale hatchery threat reduction and productivity improvement targets. Such an analysis could help determine where hatchery increases may be appropriate.

**Commented [s15]:** As noted above, seeking hatchery production increases is not the only option for mitigating losses from human-caused impacts, and could exacerbate existing recovery challenges associated with excess hatchery fish on spawning grounds. While we are making recovery headway in some watersheds and pHOS trends are improving, most fall Chinook populations are not meeting pHOS targets and some levels exceed 80%. Offsetting habitat and fish losses could be more effectively and sustainably achieved by substantively increasing efforts to improve capacity and productivity of existing habitats, and permanently protecting those areas.

**Commented [s16]:** The LCFRB has provided WDFW with recommendations for increasing hatchery production in a manner that could benefit both recovery and SRKW food production.

**Commented [s17]:** The LCFRB strongly supports enhancement of select areas fisheries, provided they are coupled with management approaches that minimize impacts to natural origin populations and support recovery progress.

**Commented [s18]:** The CBP Phase 1 report captures recovery plan delisting abundance goals as the "low end" goals, but there are other targets in existing NOAA-approved recovery plans, including threat reduction and productivity improvement targets, that are applicable to WDFW hatchery and harvest management but are not captured in the CBP report.

Oregon may have negative effects on the non-guided sector of the recreational

fishery, such as overcrowding and a reduction in open fishing days. Further, it is recognized that any effective program to limit the number of recreational guide licenses on jointly managed waters of the Columbia River would need to consider the regulatory frameworks of both Oregon and Washington, that statutory changes may be required in one or both States, and that there are many difficulties in designing a concurrent and equitable program. The Department shall initiate discussions with ODFW and consult with representatives of the recreational fishery sectors to develop objectives and options for a workable license limitation program. In a similar manner as the commercial fishing license buyback program, the Department shall convene a policy level joint-State body with appropriate Oregon representatives to develop a report assessing the effects of limiting guide licenses or other measures and evaluating alternatives for an effective concurrent program. The report is to be submitted to the Commission and appropriate Oregon authorities for consideration and, if warranted, possible transmission to statutory authorities.

5. Scientific Monitoring. In recognition that the scientific monitoring of fisheries, spawning escapements, and other measures of stock status is necessary to execute the provisions of this Policy and achieve its purpose, the Department shall seek the funding necessary, and prioritizing funds available, to properly monitor the stock status of Columbia River salmon and steelhead populations. Further, the Department shall conduct scientific studies of catch and release mortality where significant uncertainty exists in current estimates in either commercial or recreational fisheries, if funding is available.
6. Thermal Angling Sanctuaries. It is recognized that summer and fall water temperatures in the Columbia River can reach levels that adversely affect the health and survival of migrating adult steelhead and salmon. Certain tributaries may provide substantially cooler water than the mainstem Columbia River near their confluences. Research has demonstrated that migrating salmonids, particularly summer steelhead, preferentially use these differentially colder water areas under such conditions. Seasonal recreational fisheries closures in these areas may provide additional protections during these seasonally vulnerable times. In a similar manner as described for commercial and recreational guide license control actions, the Department shall strive to convene a policy level joint-State body with appropriate Oregon representatives to review available information regarding cold water refuge area migrating salmonids and the impacts of fisheries in these areas, and develop a report with recommendations on possible thermal angling sanctuaries. The report is to be submitted to the Washington and Oregon Fish and Wildlife Commissions for their consideration for possible concurrent regulations.

~~7. Select Area fisheries. The Commissions recognize that the economic benefits associated with off channel commercial fisheries is a fundamental component of a successful Columbia River salmon fishery policy. To date, enhancements have~~

~~included providing additional hatchery fish for release in these off-channel areas and expansion of winter and summer seasons in off-channel areas. These actions are intended to continue, and additional actions may be undertaken, such as increasing the production of hatchery salmon in off channel areas and further evaluation or implementation of additional off channel sites, particularly in Washington State. {Discuss keeping or deleting.}~~

### Fishery Specific Provisions

Subject to the adaptive management provisions of this policy, the Departments will manage salmon and steelhead fisheries consistent with the prior sections of this Policy and the following fishery specific objectives.

#### Spring Chinook Salmon

1. Allocation. The annual allocation to recreational and commercial fisheries is 70%/30% of allowable non-Treaty Upriver Run ESA impacts with both fisheries constrained by the pre-run size update buffer requirement that is described in the current US v Oregon Management Agreement. Within the 70% of Upriver Run ESA impacts allocated to the sport fishery, 25% (17.5% of the total allocation) is allocated to sport fisheries above Bonneville Dam. Within that 25% upriver allocation, 40% is allocated to OR/WA fisheries from Bonneville Dam up to the state line and 60% is allocated to the WA fishery in the Snake River and Upper Columbia River areas. The remaining amount of the 70% (52.5% of the total allocation) is allocated to sport fisheries below Bonneville Dam.
2. Allowable Commercial Gear. Allowable mainstem commercial gear includes tangle nets allowed pre-update and post-update and gillnet gear in the post update period.

#### Summer Chinook Salmon

1. Allocation. The amount of the non-Treaty harvestable surplus under the US v Oregon Management Agreement shall be allocated between fisheries above and below Priest Rapids Dam based on a sliding scale<sup>2</sup>. The harvestable amount for the areas below Priest Rapids Dam is to be shared 70% /30% between recreational and commercial fisheries, with 5% of the commercial share (1.5% of the total allocation below Priest Rapids Dam) allocated for incidental take in Select Area fisheries.

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<sup>2</sup> See the allocations in the current Washington Policy Document C-3620 "Columbia River Basin Salmon Management": <https://wdfw.wa.gov/sites/default/files/2019-03/c3620.pdf>

2. Allowable Commercial Gear. Allowable mainstem commercial gear includes gillnets and alternative gear.

### **Sockeye Salmon**

1. Allocation. The annual allocation to recreational and commercial fisheries is 70%/30% of allowable non-Treaty Snake River ESA impacts. The 30% commercial share is to be used for incidental impacts in commercial fisheries directed at summer Chinook salmon.

### **Fall Chinook Salmon**

1. Allocation. The annual recreational and commercial allocation is  $\leq 70\%$ / $\geq 30\%$  of allowable LRH ESA impacts and allowable non-Treaty Snake River ESA impacts (whichever is more constraining in a given year). The commercial share of such ESA impacts is to cover mainstem Columbia River and Select Area fisheries.
2. Allowable Commercial Gear. Allowable mainstem commercial fishing gear includes gillnet, tangle net, and seine gear.

### **Coho Salmon**

1. Allocation. While there is no explicit numerical sharing of Lower Columbia River Natural ESA impacts, the allocation is prioritized as follows: commercial fisheries are to be assigned sufficient impacts to implement Select Area coho and fall Chinook fisheries and mainstem fall Chinook fisheries, and the balance to in-river mainstem recreational fisheries. If these fisheries are expected to be unable to use all of the allowable impacts, the remainder will be assigned to mainstem commercial coho fisheries.
2. Allowable Commercial Gear. Allowable mainstem commercial fishing gear includes gill net, tangle net, beach seine, and purse seine fishing gear.

### **Chum Salmon**

Commercial fisheries shall be assigned a sufficient share of the ESA-impact for chum to implement Select Area and mainstem fisheries targeting other salmon species. The retention of chum salmon in recreational and commercial fisheries.

### **Adaptive Management Provisions**

The Commission recognizes that the provisions of this Policy describe a presumptive path forward to achieve the stated purposes, and that considerable uncertainty exists in how and when the purposes will be regarded as achieved. It is noted from the comprehensive review of 2013- 2017 that several aspects of the presumptive path for

the policy initiatives that began in 2013 did not occur as expected, including in particular the successful development and implementation of alternative commercial selective fishing gear, the expansion or development of new Select Area fishing areas, and the securing of enhanced hatchery production. It is also noted that some adaptive management provisions were implemented in 2017 in response to policy performance findings at that time. In addition to management performance uncertainty, there are many unpredictable events that could have a substantial effect on the presumptive path forward, including large fluctuations in short-term run sizes, changes in long-term environmental patterns, possible environmental disasters, and population restoration results occurring sooner or later than expected. Therefore, the Commissions acknowledge that adaptive management procedures will be essential to achieve the purpose of this policy and are expected to occur after proper evaluation and as appropriate to achieve the purposes of this Policy.

The Department will track policy implementation and results of the fishery management actions and hatchery production programs and provide the Commissions with annual updates and a comprehensive review as soon as possible after 2025. State-managed fisheries pursuant to this Policy will be adaptive and adjustments should be considered to commercial and recreational fisheries if policy purposes, including fishery economics and stability, are not achieved consistent with the principles of this plan. If the policy purposes are not achieved, efforts will be made to determine why and to identify actions necessary to correct course. Department staff are expected to implement actions necessary to manage adaptively to achieve the purposes of this policy with authorization from the Commission, in order to implement corrective actions.

#### **Delegation of Authority**

The Commission delegates the authority to the Department Director, through the North of Falcon stakeholder consultation process and the Columbia River Compact, to set seasons for recreational and commercial fisheries in the Columbia River, to adopt temporary or emergency regulations to implement these fisheries, and to make harvest agreements with Columbia River Native American Tribes, the **State of Idaho (added)** and other government agencies in a manner consistent with the provisions of this Policy. The Director shall work with the Director of the Oregon Fish and Wildlife to achieve implementation of the fishery regulation provisions of this Policy in a manner that results in concurrent fishing regulations between the two states in common boundary waters of the Columbia River. In the event circumstances result in a reason the Directors believe that non-concurrent fishing regulations must be considered, the Commission shall be consulted to seek resolution of the situation.

**From:** [123ContactForm](#)  
**To:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** Contact the Policy Review Workgroup  
**Date:** Friday, May 29, 2020 4:46:26 PM  
**Attachments:** [2020-5-26 Comments on the Proposed Columbia River Basin Salmon Management Plan.docx](#)

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<b>Name</b>	Robert Sudar
<b>Email</b>	fallcreek734@gmail.com
<b>Address</b>	Longview Washington
<b>Comments</b>	Please see attachment
<b>Attachment</b>	<a href="https://www.123formbuilder.com/upload_dld.php?fileid=767d7274688cb077910a1eb572bb1fcd">https://www.123formbuilder.com/upload_dld.php?fileid=767d7274688cb077910a1eb572bb1fcd</a>

The message has been sent from 97.120.211.48 (United States) at 2020-05-29 19:46:14 on Chrome 83.0.4103.61  
Entry ID: 139

May 28, 2020

To: Washington F&W Columbia River Policy Review Group

From: Robert Sudar, Columbia River Commercial Advisor

#### Comments on the Proposed Columbia River Salmon Fishery Management Policy

- In the Purpose statement, the document mentions the importance of “geographic stability” for the commercial fishing industry. A fishery primarily in Zones 4&5, with most of the fishermen located in zones 1, 2 & 3, doesn’t provide “geographic stability.”
- When discussing the Comprehensive Review, the document should include “in 2018” so that it’s clear which review is being discussed. Some anti-commercial groups could call the 2016-2017 policy update process a “comprehensive review.” That was what it was supposed to be, and we should make sure that’s not what this process is about because there was nothing comprehensive about that 2017 process.
- On page 4, item 2, The Department should be required to notify, and involve, all affected fisheries if spawning goals change. I believe that such changes did occur for summer Chinook, as did an update in the Department’s agreement with the Colvilles, but the commercial industry was never informed, much less included in the conversation, even though it was impacted.
- On page 5, item 3, I think there needs to be some discussion about the needs of the Colville tribes versus their harvest allotment. I don’t know if they’ve ever caught their allotment – why is that? The large proportion allocated to the upper Columbia limits lower river harvest opportunity. The allocation should make sense, and be attainable. I have no problem with a significant Colville allocation but it should be an amount they can catch, and that they try to catch. They often take less than 60% of their allocation. Once again, I have no problem with the Colvilles getting a large allocation, but it should be an amount they can successfully harvest in most years. The same goes for the recreational fishery in that area. It’s logical to manage for the upper Columbia to be the primary fishery, but the allocation should align with the harvest ability in most years. If the problem is that the fisheries in that area have chosen to fish mark-selectively but the run has a high percentage of wild fish, then that should be taken into account when determining harvest. Mark-selective fisheries work best when the ratio of hatchery fish to wild fish is high, like in the spring. That’s why no fishery is mark-selective for Chinook in the fall.
- Page 5, item #1. How is the well-being and stability of our industry measured today versus the 2010-2012 baseline?
- Page 5, item #2 – Which local communities are considered to be fishery dependent? Astoria, Chinook, Clatskanie, and Cathlamet, or Vancouver, Longview and Portland? What is really meant here? Again, how does a zones 4&5 fishery achieve that?
- Page 5, item #3 – the comparison of gears – current and alternative – must include economics, harvest potential (and proven track record), conservation and ability of fishermen to participate. We need an honest comparison, not a hopeful one.
- Page 5, item #4 – how much Select Area enhancement is really attainable, and what is the return on investment? Have the enhancements since 2013 actually created any significant additional harvest? Could they ever on a consistent basis?
- Page 6, item 1a – The document says that alternative gears and additional commercial harvest should be designed such that they “minimize impacts to mainstem and tributary recreational

harvest.” Is that even possible? Is that contrary to the whole idea of why there is an interest in alternative gears? Significant additional harvest of hatchery fish, if achievable, is bound to have an impact on recreational fisheries in the mainstem, the tributaries, or both.

- Page 6, item 1b – What information do we already have about this issue? We’ve been testing alternative gears for 10 years or more, with significant expenditure of funds that have so far shown few encouraging results. I would definitely suggest a comparative summary of gillnets, tangle nets and other alternative gears based on the values listed.
- Page 6, item 1b – This recommendation includes the “perspectives of commercial and recreational fisheries.” Why is the rec perspective needed when developing commercial gear? We don’t expect to be included in changes regarding recreational gear, such as barbless hooks.
- Page 7, item 2c – The 2020 Oregon SA goals are 3.14M spring Chinook, .45M SABs and 4.85M coho. Their long-term goal is 3.7M/1.0M/5.255M. They have continually fallen behind their various timetables for smolt production in the Select Areas in the last 8 years. I don’t think they’ve reached 3.14M spring smolts yet and it’s unlikely they will ever get back to 1.0M SABs. I like having the numbers in there but they should be accurate and the track record of achieving them should be clear. It might also be worth stating what the September 2012 goals were (2.4M spring/2.2M SABs/8.75M coho) and what the November 2012 goals were (2.2M/2.2M/5.97M), too, for historical perspective. The initial working group meetings in 2012 were based on former Governor Kitzhaber’s plan to boost Select Area production to completely replace mainstem harvest, even though mainstem earnings through 2016 averaged almost double the Select Area earnings in all years but one (it was about 50/50 in 2010.) In late October 2012, NMFS said that those lofty initial goals were unacceptable, hence the lower goals utilized in November 2012. There have been many problems with Select Area smolt production since 2012 – inability to collect enough SAB eggs, diseases, poor quality smolts, avian predators – clearly, quantity is of little value if the quality goes down. The economics of the industry, based on the Oregon modeling, depend on robust Select Area harvests but they provide little to most Washington Columbia River commercial fishermen.
- Page 7, item #3 – again, why should the rec perspective be included (this time in regards to buyback)?
- Page 7, item #4 – Just to compare to two of my previous comments, there is no mention of commercial input in regards to log books for guides – should there be? (I would say no)
- Page 8, item #7 – I don’t have a position right now regarding keeping or deleting this item but I think it’s worth reminding them, AGAIN, that they have continually failed to meet their goals and there is no good reason to predict they ever will, at least not on a sustained basis.
- Page 9, item #1 – There is no mention of a sharing matrix for spring in this section even though there is one in the other documents and mention of a summer matrix is included later in this document. Wednesday’s meeting focused quite a bit on a spring matrix and in general I thought the group saw some value in it. I presume that if it’s adopted in some form this wording will change accordingly.
- Pages 10&11 – in terms of Policy performance and shortfalls, the recreational community did not grow the promised angler license sales or trips – why are those not included when discussing the performance of the Policy since 2012? Those were at the heart of the discussions. Or the fact that the commercial industry was supposed to see improved economics

– a “win/win” – via the Policy but instead our economics have crashed. Those shortfalls should be mentioned when reviewing the Policy.

- Page 11 – why is Idaho added now as a valued source of input when their concerns about the goal of a 45 day spring recreational fishery before the run update have been consistently ignored year after year when scheduling the spring rec season? They are included in each Compact meeting as a listed participant. Are there specific management agreements with Idaho that the working group has in mind?

As always, thank you for continuing to hold these important meetings and for offering the public the opportunity to comment. Salmon management on the Columbia is extremely complicated and it can be difficult to describe it accurately, much less improve it. Before this Policy, there were healthy recreational and commercial fisheries in all seasons, with some fluctuations depending on run size. The Policy has provided very few gains for the recreational fishery and has decimated the commercial fishery. The data clearly shows that. It’s time to use Adaptive Management to provide corrections that will restore the commercial industry and increase the public’s access to Columbia River salmon in the marketplace. Doing so doesn’t have to cause serious restrictions to the recreational fishery. It didn’t before this Policy, and regardless of any potential changes being discussed, none would approach the allocation ratios in place prior to this Policy. There will still be significant gains for sport fishermen, but the possible changes would help restore at least some of the viability of the commercial fishermen and the Columbia River communities where they live. Feel free to contact me if you have any questions at all about these comments, or any issues regarding salmon management in the Columbia where you feel my input might be of help.

Robert Sudar, Longview

Columbia River Commercial Advisor

**From:** [Commission \(DFW\)](#)  
**To:** [Lothrop, Ryan L \(DFW\)](#); [Tweit, William M \(DFW\)](#); [Warren, Ron R \(DFW\)](#)  
**Cc:** [Dobler, Myrtice C \(DFW\)](#)  
**Subject:** FW: Contact the Commission: Commission Meetings  
**Date:** Monday, June 1, 2020 10:59:35 AM  
**Attachments:** [Continuing with the PRC .doc](#)

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FYI, went to Commissioners and Directors office.

**From:** Kirk Harrison <kharrison@rsgfp.com>  
**Sent:** Monday, June 1, 2020 10:24 AM  
**To:** Commission (DFW) <COMMISSION@dfw.wa.gov>  
**Subject:** Contact the Commission: Commission Meetings

<b>Name</b>	Kirk Harrison
<b>Email</b>	<a href="mailto:kharrison@rsgfp.com">kharrison@rsgfp.com</a>
<b>Address</b>	2395 Green Mt. Rd. Kalama Wa. 98625
<b>Subject</b>	Commission Meetings
<b>Message</b>	Please read the letter and share with other commissioners.
<b>Attachment</b>	<a href="https://www.123formbuilder.com/upload_dld.php?fileid=1e4368e067eed186bc10da335818e8af">https://www.123formbuilder.com/upload_dld.php?fileid=1e4368e067eed186bc10da335818e8af</a>

The message has been sent from 216.128.99.42 (United States) at 2020-06-01 13:24:19 on Internet Explorer 11.0  
Entry ID: 1962

Chair Carpenter.

Continuing with the PRC is a farce. It's a waste of time for the WDFW commission and WDFW staff. 2 out of the 3 members are nothing more than lobbyists for commercial gillnet interests. You need to look no further than their voting record and their constant pressure to return more gillnetting to the Columbia River. The other member does his best to combat this but is overruled at every turn by the 2 to 1 advantage held. The result is anything that comes out of the PRC is a biased effort to increase gillnetting whenever and wherever possible. Not to promote conservation. Not to promote recreational interests. The one topic supposedly focused on currently, upriver sharing of Spring Chinook, is nothing more than a smoke screen to divert attention from their true agenda.

1. With a 2 to 1 advantage, anything that comes out of the PRC is slanted by design towards increased gillnetting.
2. Ongoing requests by the PRC from the WDFW staff is wasting their time and resources.
3. Oregon has made it clear they are unwilling to change any of the current management of the co-managed Columbia River . So much so they pulled out of the PRC. One of the reasons for even having the PRC was to iron out any differences with Oregon. The Washington PRC is trying to **INITIATE** differences with Oregon.
4. The PRC has shown no interest in advancing a gillnet buyout program.
5. The PRC has shown no interest in developing alternative gear for the Columbia River.

The majority members of the PRC state that its important to maintain it due to the time and resources spent by those members and WDFW staff in providing information for them. In reality it is time and resources wasted while trying to advance their agenda.

The PRC should be disbanded and any policy regarding Columbia River management should be decided by the entire commission. Policy decisions need to be made without the biased input of a select few with an agenda that narrows down any options unless those options fit their purposes.

Thank you,

Kirk Harrison – Kalama, Wa.