

Decision Rationale Document
Washington Fish and Wildlife Commission Revisions to Policy C-3620
Columbia River Salmon Fishery Management Policy
September 2020

The Washington Fish and Wildlife Commission (Commission) [adopted revisions and updates to Policy C-3620](#) at its meeting on September 11, 2020, subsequent to a special workshop on September 1, 2020 to consider public comment and policy issues associated with the public review draft released June 12, 2020. As expressed in the public record of the policy review process, this document describes justification and rationale for the policy language changes adopted on September 11, reasoning on dealing with concurrency issues with Oregon, and rationale in answer to some concerns and criticisms received on the public review draft containing revised language. This document does not describe or assess the environmental effects of the changes to Policy C-3620; information on this topic is the subject of a [separate document](#), prepared in accordance with the Washington State Environmental Protection Act.

Background

[The Commission adopted Policy C-3620 in January 2013](#) (the 2013 Policy) that called for major changes in the way Columbia River non-tribal salmon fisheries were managed. It identified three purposes to be achieved associated with a new fishery management framework with significant changes in allocations to, relative priority of, and management approaches for recreational and commercial fisheries. In recognition of the substantial changes and the intent to benefit both recreational and commercial fisheries, the 2013 Policy emphasized an adaptive management approach by including a detailed adaptive management section and referencing an adaptive management contingency 29 times in the balance of the policy document. The State of Oregon adopted a very similar new approach in 2013, with the Oregon Fish and Wildlife Commission (Oregon Commission) adopting [rules identifying fishery management provisions](#) and the Oregon legislative process adopting a [statute identifying similar policy purposes and adaptive management response intent](#).

The Adaptive Management section of the 2013 Policy called for a comprehensive review covering the first five years of policy implementation. In November 2018, Department of Fish and Wildlife (Department) staff completed a 204-page [comprehensive review of the 2013 Policy performance over the course of 2013 – 2017](#). The report identified many shortcomings in achieving the goals and objectives of the 2013 Policy, particularly with regard to the major initiative to restructure the commercial fishery sector without economic harm. The last sentence in the [Executive Summary](#) states a general conclusion, “The expectations in the development of the policy were not met.”

At a joint meeting of the Washington and Oregon Commissions in November 2018, an open and transparent process began to consider solutions to the shortcomings in achieving the identified

policy purposes, goals, and objectives of the 2013 initiative, as well as considering new ideas to improve Columbia River recreational and commercial salmon fisheries. Three Commissioners from each Commission were appointed to a Joint-State Columbia River Salmon Fishery Policy Review Committee (PRC) to make recommendations to achieve regulatory and policy concurrency in 2019 by mid-March 2019, and for 2020 and beyond by the end of 2019.

The PRC made recommendations to both Commissions on February 26, 2019, which were adopted by regulation by the Washington Commission and matched by emergency regulation by the Oregon Commission for items relevant to 2019. The Oregon Commission suspended their participation in the policy review process in late October 2019 due to the terming-out of a majority of their Commission members; the Washington Commission continued the process through to the policy changes decision point in September 2020. [The extensive record of this review process is available online, including meeting agendas, analytical materials, meeting summaries, public comment, meeting audio and video recordings, and a public review draft of Policy C-3620 revisions and updates.](#)

Justification and Rationale for Policy Language Changes

The analytical results from the comprehensive review showed a variety of shortcomings in the 2013 Policy performance, ranging from very significant to relatively minor. This portion of the document describes some key policy initiatives that were not achieved and the justification and rationale for the language revisions responsive to those failures. Additionally, this section describes language revisions associated with new ideas and initiatives along with the rationale for their inclusion.

Key Policy Performance Shortcomings

Perhaps the most significant failure was not achieving one of the three overarching purposes of the 2013 Policy: to “maintain or enhance the economic well-being and stability of the fishing industry in the state.” After normalization for variable run size as an effort to isolate the effects of policy measures, the comprehensive review report concluded the economic metrics for both commercial fisheries (ex-vessel value of the catch) and recreational fisheries (angler trips) were lower during the 5 years after the 2013 Policy was adopted than the period prior to adoptionⁱ. The joint-staff analysis completed during the PRC process further isolated policy effects by normalizing for both ocean survival influences on run size and commercial price-per-pound variables, and showed the commercial fishery would have substantial economic reductions after 2018 if the 2013 Policy continued. If the 2013 Policy were implemented after 2018, there would be an overall reduction of over 30% to the commercial fishery when the Oregon off-channel catches are included and a reduction of nearly 60% in mainstem and Washington off-channel economic value, in comparison to the three years immediately prior to implementing the 2013 Policyⁱⁱ.

The economic performance failure for the commercial fishery is particularly noteworthy in that the 2013 Plan provided four circumstances in the Adaptive Management section that

warranted a policy reconsideration response if the presumed benefits to commercial fisheries did not materialize; [all four circumstances occurred](#).

Other key policy implementation or design shortfalls with response rationale in this report include:

- the failure to transition the commercial fishery to more selective alternative fishing gear;
- the failure to find off-channel areas where the commercial fishery could selectively harvest hatchery fish in Washington as a replacement for mainstem Columbia River fishing;
- the failure to enhance hatchery production; and
- the failure to conduct a buy-back program for commercial fishing licenses.

Policy Response to the Comprehensive Evaluation Report

The economic performance shortcomings to the commercial fishery are partly addressed by changing the allocation for species, other than coho salmon, to those that were in effect at the half-way point in the 2013 Policy—a key point when a transitional leap from gillnet gear to more selective alternative gear was to have occurred. The effects of this change in allocation are not large: principally, there is a change to about 70% for the recreational fishery and 30% for the commercial fishery, from about 80% recreational and 20% commercial if alternative gear and off-channel fishery locations and enhancements had been implemented successfullyⁱⁱⁱ. The revised policy language softens the effect on the recreational fishery by adopting abundance-based allocation matrices that provide 80%/20% sharing to the recreational fishery when run sizes are low for [spring chinook](#) and [summer chinook](#)^{iv}. These abundance-based allocation matrices provide for long-term sharing to average about 70%/30% based on the occurrence of low, medium and high abundance over the past 14 years. There is no allocation change for coho salmon under the rationale that the current allocation provisions are sufficient at this time.

Regarding the failure to develop and implement more selective alternative commercial fishing gear since 2013, the revised policy language contains a new approach on alternative gear development and stronger implementation language to use alternative gear when it can be scientifically demonstrated to have selectivity greater than gillnet gear^v. This will have two-fold benefits, the first relating to the conservation value of successfully removing a significant number of hatchery fish from wild fish spawning areas. When hatchery fish overlap with wild fish during spawning, they have the potential to interbreed, which may reduce the fitness of the wild population. Successful development and use of alternative gear can help reduce the risk of adverse genetic effects on wild fish. Secondly, effective use of alternative commercial fishing gear targeting surplus hatchery fish will address the economic performance deficiencies of the 2013 Policy to the commercial fishery.

Regarding the failure to develop and implement a commercial fishing license buy-back program, the revised policy language calls for a bi-State policy committee to develop equitable recommendations to authorities in both Washington and Oregon^{vi}. This recognizes the

importance of the bi-State connection in setting objectives and adopting effective mechanisms that can achieve such objectives. The revised policy language is consistent with the rationale of Governor Inslee in his 2020 budget veto of immediate funding for this matter^{vii}.

Regarding the failure to locate stock specific off-channel areas in Washington where hatchery supplementation could successfully occur, the revised policy language calls for hatchery enhancement in areas where and when it can be done while grossly minimizing the genetic and ecological risks to wild populations^{viii}. This change recognizes that the geography on the Washington side of the Columbia River simply does not have an equivalent of Youngs Bay, Oregon. However, hatchery enhancement in other areas can achieve significant commercial fishery benefits when implemented with other policy measures, such as alternative gear development. This change will also provide upstream recreational fisheries with additional salmon that would otherwise not pass through mainstem Columbia River areas if planted in downstream off-channel areas.

Economic benefits to both commercial and recreational fisheries would occur from the policy language calling for enhanced hatchery production^{ix}, strong habitat protection and enhancement that will benefit both natural and hatchery populations, and increased natural production from run reintroductions above dams^x.

The revised policy language addresses the shortcomings of the 2013 Policy in an accountable, positive manner. It would not be responsible to decline making policy changes in reaction to the comprehensive evaluation showing demonstrated key policy failures; it would also be contrary to the Adaptive Management intent of the 2013 Policy.

New Policy Provisions

As part of the policy review process, the Washington Commission solicited concepts to improve Columbia River salmon fishery policies; [several ideas came forward over the course of the 2018 policy review process](#)^{xi}. New ideas also came forward during the Joint-State PRC process and over the course of the 2020 Washington Commission process. Following are key new policy directives that were not included in, or are appreciably different from, the 2013 Policy language, together with the rationale for inclusion.

The revised policy language has an improved Purpose Statement more grounded in [RCW 77.040.012](#) (the mandate of Department and Commission) than the 2013 Policy, thereby advancing the conservation and management mandate of the Commission and Department in a clearer manner^{xii}. These revisions include:

- A re-ordering of the three over-arching purposes in the Purpose Statement to place the conservation purpose first, to demonstrate priority emphasis.
- The use of RCW wording in a verbatim manner to improve intent clarity, consistency with legislative direction, and linkage to other sections of the revised policy.

- The retention of the word “recovery”, not present in RCW wording about the conservation mandate but included in the conservation purpose of the 2013 Policy, so as to recognize the importance of recovery planning.
- The phrase “geographic distribution of fishing opportunities”, not included in the RCW wording, was added for the intent of policy agreement with public testimony received calling for a broad disbursement of fishery benefits to the various rural and metropolitan communities where such benefits are important.

There is a new guiding principle to advance the conservation of non-ESA listed salmon and steelhead populations^{xiii}. The 2013 Policy contained a guiding principle regarding only the conservation of ESA-listed populations. This addition serves to provide direct policy guidance for catch limits and conservation goals for non-ESA listed populations.

There is a strong policy emphasis on increasing the abundance of salmon in the Columbia River basin. Revised language includes a provision for specific policy advocacy for higher abundance of both hatchery and naturally produced fish, including establishing short and long-term goals for each^{xiv}. The revised policy language advocates for more hatchery fish, including for Southern Resident Killer Whale conservation reasons, where it can be done with minimal impacts to wild fish. There is also policy advocacy for more wild fish, via reintroductions above dams as per the Columbia Basin Partnership Task Force report (such as above Grand Coulee Dam), and from habitat restoration and improvement policy directives to support salmon and steelhead populations. There is policy advocacy for the principle of living up to mitigation responsibilities for lost salmon runs due to impassable dams and permanently degraded habitat (such as from the federal hydro-power system). The rationale for these various measures calling to “make the pie bigger” is to improve total salmon recovery efforts, to maintain and enhance Columbia River recreational and commercial fisheries, and to provide additional benefits to ecological processes and marine fisheries.

The revised policy language includes an emphasis on strengthening the scientific monitoring necessary to achieve the stated purposes, goals and objectives^{xv}. This provision calls for funding priority to secure the current fishery and escapement monitoring foundations and improve on areas of key scientific uncertainty such as catch-and-release mortality rates. The rationale for this language is to improve the probability of policy implementation success.

The revised policy language includes policy direction to consider a limit on recreational guide entry into the fishery, in a concurrent manner with Oregon authorities^{xvi}. The rationale for this provision is to address public concern about negative effects on the non-guided sector of the recreational fishery.

The revised policy language includes a policy provision to consider thermal refugia from fisheries in mainstem Columbia River areas with the Oregon Commission, as a conservation measure responding to an increase in the pre-spawning mortality rates of migrating salmon and steelhead associated with climate change linked elevated water temperatures in the mainstem Columbia River^{xvii}.

The revised policy language includes a change in the allocation of upriver spring chinook within the recreational fishery sector to provide a greater share to Snake River recreational fisheries and a lesser share to recreational fisheries below Bonneville Dam. This change reduces the allocation to below Bonneville Dam fisheries from 75% to 70% and increases the allocation to Snake River fisheries from 15% to 20%^{xviii}. The rationale for this change was to provide increased socio-economic benefits to Snake River fisheries and to recognize Snake River habitat restoration activities that support Columbia River salmon and steelhead populations.

Policy and Regulatory Concurrency with Oregon

Promoting orderly fisheries in waters in which the states of Oregon and Washington have concurrent jurisdiction is an important stated purpose of the revised policy language adopted by the Washington Commission. Achieving orderly fisheries involves two concurrency considerations: regulatory concurrency and policy concurrency. There is a good basis for both regulatory concurrency, having the same fishery regulations in both states for a particular season, and policy concurrency, having the same policy intent for long-term fishery management, being achievable.

There is a long history of Washington and Oregon achieving regulatory concurrency when there are fishery management policy differences. It has been several decades since there has been significant regulatory non-concurrency^{xix}. Recent years stand as good examples where salmon fishery policy differences have been in effect, but regulatory concurrency was negotiated given the high value both Commissions have placed on achieving orderly and enforceable fisheries. In 2019, Oregon matched Washington's regulations as necessary through the balance of the year on the basis of the March PRC recommendation and Washington Commission adoption of the PRC recommendations, despite non-concurrent policies being in place. In early 2020, concurrent regulations for 2020 fisheries were achieved when an approximate mid-point compromise was negotiated from different policy positions between the States, as a non-precedential one-year agreement.

There is also a strong history of Oregon and Washington achieving long-term fishery management policy concurrency. One recent example was 2013, when both states came to primary policy agreement on a broad spectrum of substantial changes in how recreational and commercial salmon fisheries were to be managed. Another example is the [Joint State Accord on 2006-2008 Sturgeon Fishery Management](#).

Both states have similar mandates calling for (1) orderly fisheries under concurrent regulations, and (2) corrective policy actions if the objectives of the 2013 reforms are not achieved. In Washington, these two policy provisions are firmly expressed in the 2013 Policy. In Oregon, these policy objectives are expressed in a [statute established in 2013](#). Also, since 2018 when the joint-state policy review process began, representatives from both Commissions have expressed the goal of reaching policy concurrency for the long-term, so that policy implementation can proceed.

Given the joint-state history, the independent state mandates, and the common desire to resolve contentious policy issues, it is reasonable to expect that the spirit of appropriate compromise will prevail and that concurrent regulatory and policy concurrency in Columbia River salmon fishery management is achievable.

Response Rationale to Concerns and Criticisms of Language Revisions

The Commission received a significant amount of public comment on the public review draft. Following are three areas of concerns and criticism of the public review draft discussed by the Commission in September and the response rationale that is important justification for changes adopted.

The Commission received a letter claiming that the revised language “abandons the Old Policy and its reforms” and “would undo efforts to enhance the conservation and selectivity of Columbia River salmon fisheries under the Oregon-Washington Columbia River reforms”; several other letters, emails, and public testimony expressed essentially the same or very similar points.

- Rather than abandoning the tenants of the 2013 Policy, the revised language adopted by the Commission retains the exact wording or essence of 9 of the 12 specified Policy Guidelines in the 2013 Policy^{xx}, maintains its organizational structure and retains some of its exact or near-exact wording. Notably, the revised language adopted by the Commission implements, as opposed to abandons, the adaptive management reform provisions and intent of the 2013 Policy.
- Rather than undoing conservation or selectivity measures in the 2013 Policy, the revised language retains the two main conservation measures of the 2013 Policy and adds new conservation measures.
 - The primary conservation purpose of the 2013 Policy was to prevent overfishing; this purpose is maintained in the revised policy language.
 - The other key conservation purpose of the 2013 Policy was to remove a high proportion of surplus hatchery fish by implementing alternative commercial fishing gear; as mentioned earlier, the revised policy retains this concept and provides stronger development and implementation provisions to accomplish this.
 - The revised policy language adds additional conservation measures beyond those contained in the 2013 Policy, including:
 - consideration of thermal refugia angling sanctuaries with the Oregon Commission;
 - a new policy guideline to advance the conservation of non-ESA listed salmon and steelhead populations;
 - conservation language regarding the emphasis for hatchery enhancements to be done in a manner that grossly minimizes genetic and ecological impacts to wild salmon and steelhead populations;

- policy direction for conservation of Southern Resident Killer Whales by accommodating a hatchery production increase initiative to increase their preferred prey.

The Commission received numerous letters and emails and verbal testimony stating the public review draft policy would “returns gillnets to the lower Columbia River” and “open year-round gillnet fishing in the Columbia River”, which will “reduce sport fishing seasons by up to 25%”. On the surface, this kind of input suggests that the impacts of the revised language present a substantial impact to recreational fishing. However, according to the staff analysis, the revised policy language results in relatively little difference in estimates of angler trips in comparison to status quo seasons of recent years. The staff analysis of the change in angler trips shows a [reduction of less than 2% across all seasons](#), with the greatest impact in any one season of [about 11%](#) (the summer chinook season below Priest Rapids Dam). The number of days of gillnet fishing in 2021 would not be year-round, but rather something very similar to what has occurred in recent years, which has been less than 20 days; as alternative gear is successfully implemented, the number of days that gillnet gear would be used would decline. Thus, the impact of the revised language adopted by the Commission on recreational fishing opportunity is relatively minor. Lastly, gillnet fishing gear has been allowed in the Columbia River in 2020, 2019, and all prior years for over a century, something that does not comport with a claim the revised policy language “returns gillnet fishing in the Columbia River”.

The Commission also received numerous written comments and public comment expressing concern about “adding gillnet fisheries” at a time when the pattern of Columbia River salmon and steelhead runs are in “steep decline”, “heading towards extinction”, or other expressions of very negative status and trend.

- Regarding “adding gillnet fisheries”, the rationale for the revised language adopted by the Commission follows the important principle that no additional fishing pressure is to be authorized beyond the level allowed for in the 2013 Policy. There is simply a reallocation of about 10 percentage points in some runs, and no change in allocation in other runs, from within the impacts already allowable designed to achieve conservation limits and goals. As addressed earlier, there is also policy direction that gillnet fishing gear is to be allowed only when appropriate in the context of successful alternative gear options being available.
- Regarding the status and long-term trends of Columbia River salmon and steelhead, [50 year data compilations by staff](#) show that the returns to the Columbia River by species and run have increased through recent decades, as opposed to being in a state of deep decline. Notably, some stocks have been noted as being of special conservation concern, such as Upper Columbia River wild A-run steelhead, Upper Columbia River wild spring chinook, and wild B-run steelhead^{xxi}; there are also areas where hatchery reductions have resulted in much lower abundance than previous decades. On the other hand, some stocks are doing exceptionally well: the fall chinook count at Bonneville Dam in 2015 was the highest since the dam was built in 1938 and the total return was likely the largest return since 1925; the sockeye return in 2020 was the second highest since Bonneville Dam began counting in 1938 and the 5 largest runs since 1952 have happened in the last decade; the summer chinook run has also shown a strong rebound in recent years from low levels following the

building of 6 mainstem Columbia River dams between 1958 and 1967—runs have exceeded the Priest Rapids Dam escapement goal of 50,000 adult fish in 17 of the past 20 years. Thus, the rationale for the revised language adopted by the Commission is to not add more fishing pressure on stocks of conservation concern and to recognize the true current state of Columbia River salmon and steelhead abundance.

End Notes

ⁱ Regarding the recreational fishery, the comprehensive report concluded for the five year period 2013 – 2017: “After standardizing the data for total salmon returns to the Columbia Basin (angler trips/fish returns), the annual number of angler trips to mainstem fisheries downstream of Bonneville Dam decreased overall during the post Policy period despite a slight increase in total fishing days.” Regarding the commercial fishery, the report concluded for the same time period: “Ex-vessel value derived from off-channel fisheries did not increase as expected during the Policy implementation period and primarily benefited Oregon fishers. Overall, the commercial fishery saw a decrease in ex-vessel value after standardizing for run size.”

ⁱⁱ The slide below summarizes the economic evaluation presented by in [the joint-staff analysis at the third PRC meeting](#) that resulted in policy recommendations to the Washington and Oregon Commissions. The information in the “Pre-Policy Base” column shows the economic metrics for 2010 – 2012, the immediate three years prior to implementation of the 2013 Policy. The information in the column labeled “2. 2018 Washington Policy” shows estimated economic metrics in 2019 if the 2013 Policy were implemented exactly as written, and 2019 had average run sizes and commercial price-per-pound values. The comparison of these two columns shows that for the commercial fishery there would be an overall reduction of 32% when the Oregon off-channel catches are included and a reduction of 58% in mainstem and Washington off-channel economic value; for the recreational fishery there would be an increase of 4% in angler trips. To isolate the effects of the policy measures, this modeling assumed normalized abundance and price-per-pound parameters, including assuming such average conditions for 2019.

Model Option Summary

		Modelling Estimates for 2019				
		Pre-Policy Base	1. Transition Period Policy (2016) with current OR Policy releases	2. 2018 Washington Policy	3a. No Loss of Economic Benefit Potential #1	3b. No Loss of Economic Benefit Potential #2
Economic Metrics	Sport Angler Trips	339,846	349,780	354,378	350,775	350,775
	Commercial Ex-Vessel Value	\$4,948,463	\$4,229,789	\$3,362,124	\$4,158,775	\$4,169,435
Commercial Ex-Vessel Detail	Mainstem Total	\$3,210,479	\$2,225,915	\$1,358,250	\$2,154,900	\$2,165,561
Commercial Ex-Vessel Detail	SAFE Total	\$1,737,984	\$2,003,874	\$2,003,874	\$2,003,874	\$2,003,874

- All options show increase in angler trips compared to base
- All options show decrease in commercial ex-vessel values compared to base

Washington Department of Fish and Wildlife: Information subject to changes and amendments over time

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ⁱⁱⁱ The allocations just prior to the presumed shift to alternative commercial fishing gear were as follows for the recreational fishery and commercial fishery, based on impacts on constraining ESA-listed stocks: 70%/30% for upriver spring chinook and sockeye and $\leq 70\%$ / $\geq 30\%$ for fall chinook; Upper Columbia River summer chinook, which are not ESA-listed, had 70%/30% sharing for fisheries below Priest Rapids Dam.

^{iv} See pages 8 and 9 of the [adopted revised language](#).

^v In the [adopted revised language](#), see General Provision 1, page 5 for new approach and stronger emphasis language; Guiding Principle 4 under the Orderly Fisheries header and Guiding Principle 3 under the Maintaining and Enhancing Fisheries header for emphasis language; and the Fishery Specific Provisions chapeau on page 8 for policy implementation direction to the Washington seat in the Columbia River Compact to favor the use of alternative gear, including tangle nets, when it can be scientifically demonstrated to have selectivity greater than gillnet gear.

^{vi} See General Provision 3 on page 6 of the [adopted revised language](#).

^{vii} On April 3, 2020, Governor Jay Inslee used his line-item veto authority to reduce the 2020 supplemental budget passed by the Washington Legislature. The section dealing with a veto of an amount directed towards a Columbia River commercial fishing license buyback program is as follows.

Section 307(22), pages 339-340, Department of Fish and Wildlife, Columbia River Salmon Policy.
This proviso directs the Department of Fish and Wildlife to implement a voluntary buyback program to purchase commercial gill net fishery licenses for Columbia River, Grays Harbor, and Willapa Bay. It is premature to move ahead with a buyback program. To be successful, any gill net fishery buyback needs to be developed in concert with license holders and the state of Oregon. I encourage the department to continue work with Oregon and commercial gill net license holders on developing a workable buyback program. For these reasons, I have vetoed Section 307(22).

^{viii} See Guiding Principle 5 under the Conservation header and General Provision 2.b on page 6 of the [adopted revised language](#).

^{ix} See Guiding Principle 5 under the Conservation header, page 4 and General Provision 2, page 5 of the [adopted revised language](#).

^x See Guiding Principle 3 and 4 under the Conservation header, page 4; General Provision 2, page 6; and General Provision 6, page 7; and the first paragraph of the General Policy Statement section of the [adopted revised language](#).

^{xi} The hot link in the narrative connects to the [meeting materials of the February 6, 2019 PRC meeting](#), which contains a document titled **List of Ideas Matrix – derived from 2018 WA review** which contains numerous ideas of possible changes to the 2013 Policy.

^{xii} See the Purpose paragraph on page 2 of the [adopted revised language](#). It shows the result of the following modification of language in the [public review draft](#):

The over-arching purposes of this Policy are to guide management of Columbia River non-Tribal fisheries in a manner that

1. achieves conservation, **preservation**, recovery, protection and perpetuation goals for Columbia River salmon and steelhead;
2. **does not impair the resource and to** maintains **and enhance** the economic well- being, and **geographic** stability of the **fishing industry in the State by enhancing and improving both** recreational and commercial fishing, **including the geographic distribution of fishing opportunities**; and
3. **to conduct** **promotes** orderly fisheries in waters in which the states of Oregon and Washington have concurrent jurisdiction.

In addition to rationale in the paper narrative, the word preservation was added because of its presence in the RCW language describing the mandate of the Commission and the intent to preserve such things as genetic resources, and specifically not “preservation” in the sense of no-take preservation. The word perpetuation, not in

the 2013 Policy, was added because it is in the RCW language and the intent to emphasize the policy goal of increasing salmon abundance towards levels perpetuated in the past.

^{xiii} See Guiding Principle 2 under the Conservation header on page 2 of the [adopted revised language](#).

^{xiv} See General Provision 2 on page 5 of the [adopted revised language](#).

^{xv} See General Provision 5 on page 7 of the [adopted revised language](#).

^{xvi} See General Provision 4 on page 7 of the [adopted revised language](#).

^{xvii} See General Provision 6 on page 7 of the [adopted revised language](#).

^{xviii} See the Fishery Specific Provisions, Spring Chinook paragraph on page 8 of the [adopted revised language](#). It shows the result of the following modification of language in the [public review draft](#):

Allocation. The annual pre-season allocation for recreational and commercial fisheries is in accordance with the abundance-based provisions in the table below, 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 proportion of Upriver Run ESA impacts allocated pre-season to the recreational fishery, 75% 70% are allocated to lower river recreational fisheries and 25% 30% are allocated to recreational fisheries above Bonneville Dam. Within the 25% 30% upriver pre-season allocation, 10% points are allocated to OR/WA fisheries from Bonneville Dam up to the state line and 15% 20% points are allocated to the WA fishery in the Snake River and Upper Columbia River areas.

^{xix} There have been, and are, examples of minor regulatory non-concurrency. As a current example described in a [special report on the value of concurrent regulations](#) that was part of the comprehensive review, Washington allows 6 jacks to be retained daily in the recreational fishery while Oregon allows 5, and Washington requires jacks to be recorded on catch cards and Oregon does not.

^{xx} Nine of the twelve guiding principles shown on pages 2-3 in the 2013 Policy are included verbatim or in essence in various locations in the revised language adopted by the Commission. The three that are not included were

1. number 12, calling for a Marine Stewardship or other marketing certification of the commercial fishery, which was not included after unanimous advice of the staff and commercial fishery representatives for a variety of reasons;
2. number 10 calling for enhancement of hatchery releases in off-channel areas, which was not included due to the lack of suitable off channel areas in Washington; and
3. number 8 dealing with a transition of gillnet fishing gear out of mainstem Columbia River areas, shown below.

Subject to the adaptive management provisions of this Policy, and after thorough evaluation, seek to phase out the use of non-selective gill nets in non-tribal commercial fisheries in the mainstem Columbia River, and transition gill net use to off-channel areas.

Elsewhere in the 2013 Policy, a deadline of 2016 was established for a substantial amount of the transition and 2018 was set as an absolute transition deadline.

After thorough evaluation and in accordance with the adaptive management provisions of the 2013 Policy, the revised language does not set a deadline for alternative gear transition, but rather relies on a new approach to advance the development and use of alternative commercial fishing gear.

^{xxi} See pages 39 and 40 in the [2020 Washington – Oregon joint staff report on the stock status of Columbia River salmon, steelhead, and white sturgeon](#), showing the two lowest returns of B-run steelhead since 1984 occurring in 2017 and 2019.