Washington Department of FISH and WILDLIFE

Columbia River Salmon Fishery Policy Workgroup (CRW)

Public Comments received between July 15, 2020 through noon on July 20, 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:	Director (DFW)
To:	Dobler, Myrtice C (DFW)
Subject:	FW: Columbia River Salmon Policy C - 3620
Date:	Monday, July 20, 2020 8:50:18 AM
Attachments:	WFWC policy C - 3620 Revision 17 July 2020 Final.pdf Salmon Graphics + a few Sea Lions.pdf

Myrtice – Comments on Policy C-3620.

Tina Nisbet
WDFW Director's Office

From: crabby@bakerbay.org <crabby@bakerbay.org>
Sent: Thursday, July 16, 2020 7:22 AM
To: Director (DFW) <director@dfw.wa.gov>
Subject: Columbia River Salmon Policy C - 3620

Director Susewind

Attached is a reminder that the WFWC is dragging their feet on renewing the Columbia River Salmon Policy so that the gillnet fleet cannot go back to work; the fleet has been furloughed for too many years. C – 3620 needs serious modification so that our Fish Dependent Communities and the Orca whales stop STARVING to death. RAISE MORE SALMON!

Problem is the WDFW has suspended salmon production west of Bonneville Dam by approximately 75 million. These were the fish that drove the rural coastal Fish Dependent Communities economy and can once again if WFWC gets it RIGHT this time. The Heinous Kitzhaber Plan has been bad for all fishermen, not just the gillnetters. WA is selling less recreational fishing licenses today than when the Kitzhaber fiasco began & that would not be happening if there were fish to catch. If the salmon do not get sent to the ocean via hatchery production there is no salmon to catch & what few do make it to the ocean get eaten by sea lions on their return trip before there is any fishing allowed, WHAT IS WRONG WITH THIS PICTURE; it needs to be fixed; Governor Inslee & Legislature needs to give WFWC some direction they cannot bend around the axil. Not only are gillnet and troll fishermen suffering the charter fleet is also taking in on the nose – Westport charterboats at the peak of good salmon fishing had around 240 vessels, today just 17; Ilwaco just as bad. How can WFWC/WDFW call their ACTIONS salmon management; definitely they have forgotten that people are a part of salmon management, these are NOT throw away folks, they were real people that had real good jobs in rural communities that cannot be replaced by working at McDonalds serving ice cream to tourist.

Second attachment has four slides from some other PP presentations that show graphically what is going on with salmon management = Fish Dependent Communities suffer economic shock of greatly reduced salmon hatchery production on the fish they used to be able to harvest, they are no longer there to catch due to hatchery reductions and the C – 3620 WFWC policy. The upper Columbia Basin salmon are up a bit but those fish go to Alaska and not available on the coast for fishermen or the Orca.

Very Concerned for the failing economic health of our Fish Dependent Communities,

Dale Beasley, president CCF & CRCFA

On watch serving the needs of the coastal fishing industry and coastal fish dependent communities

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

July 17, 2020.

Washington Fish and Wildlife Commission:

RE: Please Advance WFWC Policy C – 3620 without delay

The Coastal Coalition of Fisheries is an association of fishermen's, shellfish growers' and processors' organizations and affiliates located on the Washington and Oregon coast and Puget Sound. Our membership represents sport and commercial fishing organizations, shellfish growers, and other multiple species and gear types. We are requesting that the Washington Fish and Wildlife Commission expedite passage of its reforms for the Columbia River Harvest Policy C-3620.

We also hope that this action will lead to meaningful review and revision of the Willapa Bay and Grays Harbor policies. These policies have failed, as demonstrated by WDFW's own staff documents, such as the Nov. 2018 Comprehensive Evaluation of the Columbia River Basin Salmon Management Policy C-3620, 2013-2017. During the 8-years duration of the policy, the coastal and Columbia River gillnet fleets and their communities have suffered the loss of a mainstay of their local economies, as the Department's own numbers confirm.

Although the Commission authorized the Columbia River Policy Workgroup to work on reforms, and both Oregon and Washington commissioners formed that work group, Oregon withdrew from that process in early 2020 The Washington Commission voted to continue. We would like to commend the Washington Commission for its foresight and diligence in this regard and support their work. However, that process has now been delayed due to a decision by the Washington Chair, in response to a phone call from the Oregon Chair. We see no reason why Washington should postpone its public process. Oregon pulled out of the original process, and still has not re-joined. The Oregon Commission agendas for the rest of 2020 show nothing to date that indicates the Commission plans to discuss or review the Policy. We believe that the Washington Commission should set a higher standard for fisheries conflict resolution, fisheries policy revision, and fisheries management, particularly as the Policy mandated adaptive management. We also believe the Commission should defend its own state's commercial fleets. The Department's economic figures demonstrate that the commercial fishers were the ones whose incomes have been most adversely affected. There is no good reason to prolong this situation.

We want to see the Commission fulfill the Department's legislative mandate to "promote orderly fisheries and… enhance and improve recreational and commercial fishing in this state." All coastal fishing communities are watching this process. We know what happens to one of our members can happen to the others. Salmon fishing is a seasonal occupation; once the fish have gone by, the fishing opportunity is over. This fact is why time is of the essence in fisheries management. This process has gone on far too long as it is. We are hearing worrisome reports of salmon catches so far in Alaska. The Department is also working on disaster relief funding

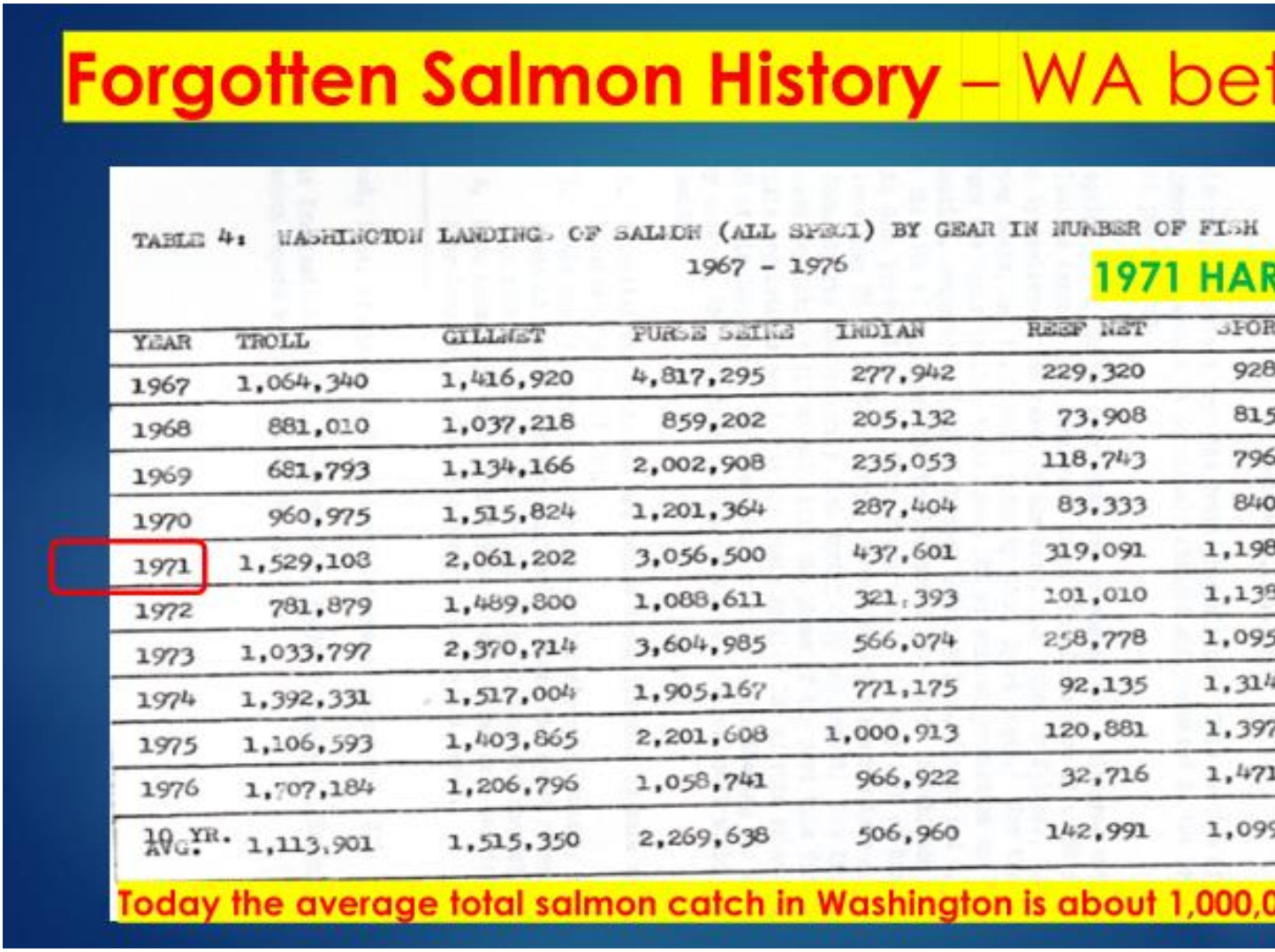
for prior fishing years, as well as Covid-19 relief. If ever there were a time for the Commission to take seriously their mandate of enhancing and improving their fisheries, it is now. We urge the Commission to expedite this decision to stabilize and create more viable fisheries in Washington.

Sincerely,

Dale Beasley,
President

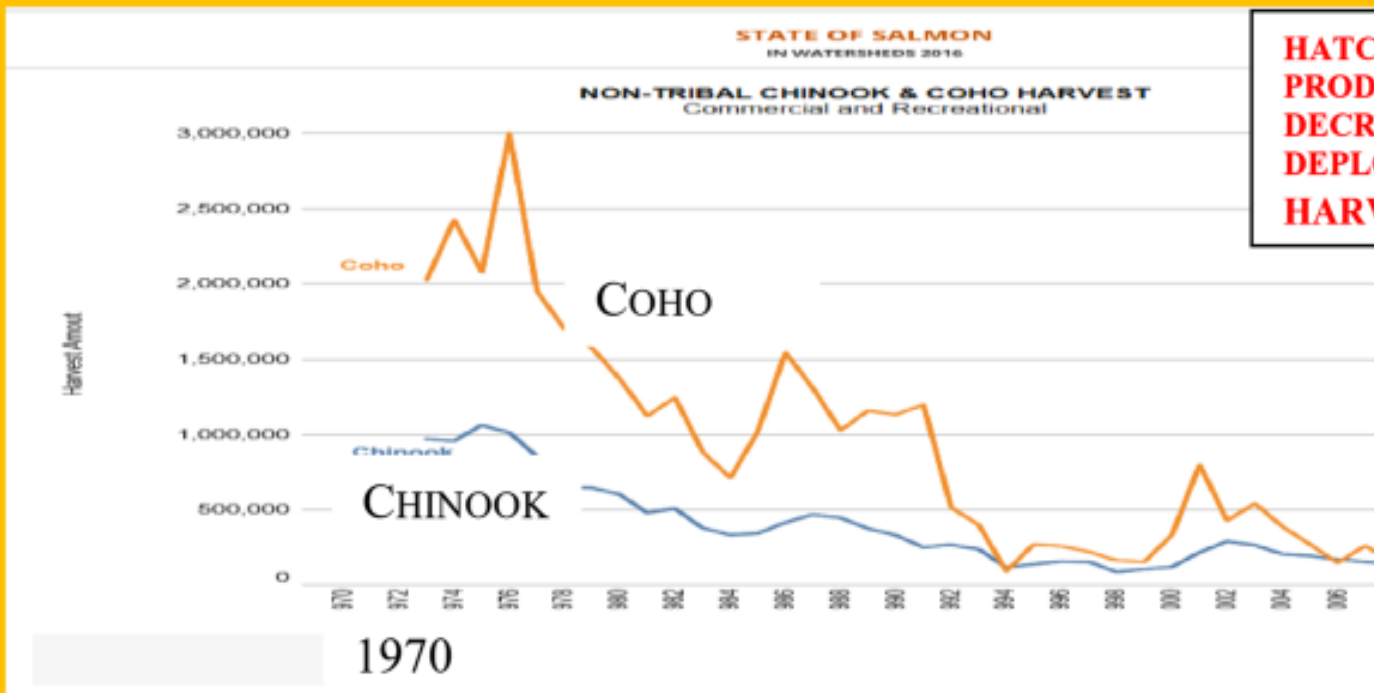
Cc: Kelly Susewind, Director, Washington Fish and Wildlife
J.T. Austin
Rep. Brian Blake
Rep. Jim Walsh
Sen. Dean Takko

Just a couple of slides from an old PowerPoint of mine



WASHINGTON SALMON CRISIS – SALMON HARVEST DECL

AGGRESSIVE SALMON ENHANCEMENT NEEDED OR SALMON/ORCA WILL

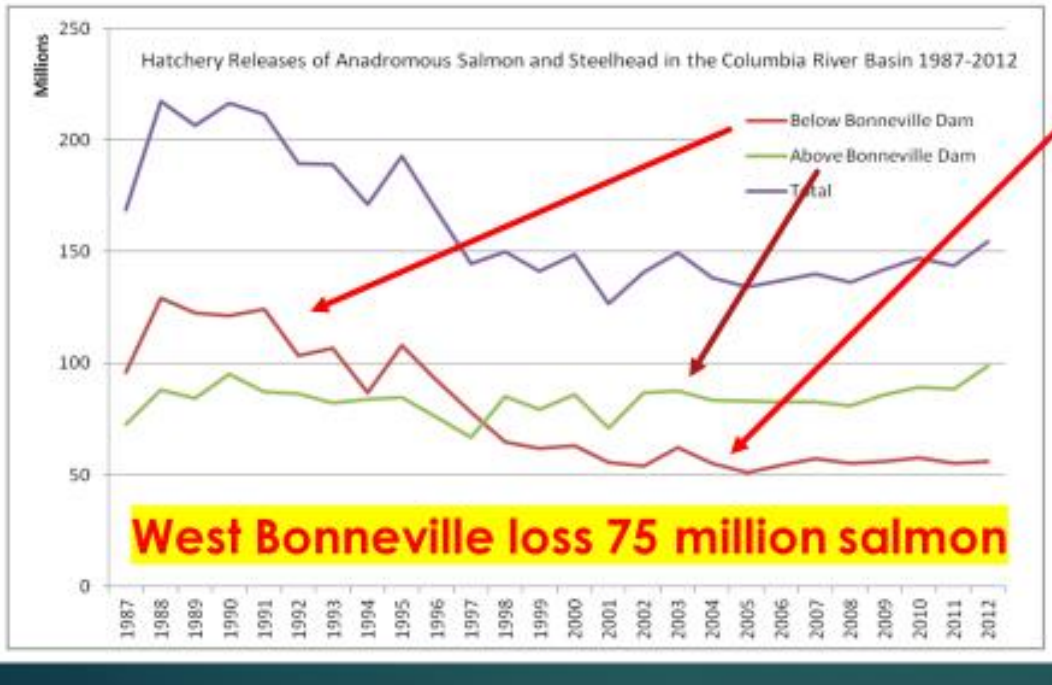


INCREASED SALMON HATCHERY PRODUCTION IS THE BEST AVAILA


When is enough enough?
NO Fish Out NO Fish
REMEDIATE

Saving Salmon – Increase Hatchery Productio
Saves Fish Dependent Communities

1987-2012 showing trends above and below Bonneville Dam (top frame) and by hatchery management entity (not funding source) for releases above Bonneville Dam (bottom frame). Releases below Bonneville are primarily from ODFW and WDFW hatcheries. Data include total releases of eggs, fry, smolt, and adults, and are preliminary for 2012. Source: Fish Passage Center.



- 1970's vs 201
- Similar overal
  - Approxim
- Why is comm

- Stock selectio
- No Toutle Riv
- Chinook proc
  - Mature in
- Massive Pred
  - Sea Lions
- ESA listing
- 50/50 Tribal St
- Lawsuits
- Relevant Hat
- JOB mitigatio
- Mitchell Act F
- HSRG favors W
- Mark Selectiv
- **JOBS MUST M**

OKANOGAN COUNTY

Board of Commissioners

July 7, 2020

Washington Dept. of Fish and Wildlife Commission
Attn: Chairman Carpenter
PO Box 43200
Olympia, WA 98504-3200

Dear Chairman Carpenter,

The Board of Okanogan County Commissioners is submitting this letter in regard to the pending harvest recommendations of the WDFW Columbia River Fishery Policy Workgroup.

Immense sacrifices have been made by landowners in the Upper Columbia (UC) region to support habitat restoration for the benefit of ESA-listed spring Chinook (endangered) and steelhead (threatened). In the past 20 years, over 500 habitat projects have been implemented to support recovery, primarily on private lands. In turn, harvest management is intended, in part, to allow more fish to return to natal spawning grounds for both conservation and fisheries. Integration of habitat and harvest (as well as the other H's) will be necessary if we are to recovery our ESA-listed salmonids. UC spring Chinook are of great conservation risk, as they are the weakest populations of the Upriver spring Chinook stock.

In order to support conservation, we ask the WDFW Commission to:

- Retain the existing ban of non-treaty commercial fishing in the mainstem Columbia river for spring Chinook.
- Retain the existing 80%/20% split between recreational and commercial fishing to ensure opportunities remain for recreational fisheries in the Upper Columbia.
- Retain the existing policy that any unused impacts allow for greater escapement and not be shifted to additional commercial fisheries.
- Retain existing policy to not allow fisheries to open until the post-run size update is reported.
- Avoid any changes to mainstem summer Chinook fisheries (i.e., increasing commercial, allowing gillnet or other non-selective fisheries), as these could negatively affect UC steelhead which migrate during those times.

Telephone 509.422.7100 | 123 Fifth Avenue N. * Room 150 * Okanogan * Washington * 98840 TTY/Voice use 800.833.6388 | Fax 509.422.7106

- Maintain current recreational fishery allocations, as decreasing these could impact WDFW's ability to implement conservation fisheries, which are an important tool in adult management of hatchery fish.
- Complete development of the Columbia River Harvest Management Plan.

Okanogan County looks forward to continuing to partner with the WDFW in working toward recovery of our ESA-listed salmonids.

Thank you.

Respectfully,

BOARD OF OKANOGAN COUNTY COMMISSIONERS

By _____
JIM DETRO, Chairman

By _____
CHRIS BRANCH, Member

By _____
ANDY HOVER, Member

Telephone 509.422.7100
123 Fifth Avenue N. * Room 150 * Okanogan * Washington * 98840
TTY/Voice use 800.833.6388
Fax 509.422.7106

From:	Commission (DFW)
To:	Barbara Baker; Bob Kehoe; Brad Smith; Dave Graybill; Donald McIsaac; Anderson, James R (DFW); Larry Carpenter; McBride, Tom A (DFW); Linville, Molly F (DFW); Thorburn, Kim M (DFW)
Cc:	Dobler, Myrtice C (DFW)
Subject:	FW: Contact the Commission: Commission Meetings
Date:	Thursday, July 16, 2020 10:31:20 AM
Attachments:	WCSPA_ColRiver_C-3620_comments.Final.7.16.20.pdf

---

From: Lori Steele <lori.wcseafood@gmail.com>
Sent: Thursday, July 16, 2020 10:21 AM
To: Commission (DFW) <COMMISSION@dfw.wa.gov>
Subject: Contact the Commission: Commission Meetings

Name	Lori Steele
Email	lori.wcseafood@gmail.com
Address	650 NE Holladay Street, Suite 1600 Portland OR 97232
Phone	503-227-5076
Subject	Commission Meetings
Message	Attached please find a letter from the West Coast Seafood Processors Association to the WA Fish and Wildlife Commission regarding the Columbia River Salmon Policy, C-3620 - submitted for consideration at the July 31-August 1, 2020 Meeting. Please contact me if you have any trouble opening or reading this document.
Attachment	https://www.123formbuilder.com/upload_dld.php?fileid=f4c5095a6a91873dfaea8c4d795dd1dd

The message has been sent from 199.200.15.87 (United States) at 2020-07-16 13:21:25 on Chrome 83.0.4103.116
Entry ID: 2268

West Coast Seafood Processors Association
650 NE Holladay Street, Suite 1600
Portland, OR 97232
(503) 227-5076

July 16, 2020

Washington Fish and Wildlife Commission
600 Capitol Way North
Olympia, WA 98501-1091

Mr. Larry Carpenter, Chairman
Mr. Jim Anderson
Mr. Bob Kehoe
Dr. Bradley Smith
Ms. Barbara Baker, Vice Chairman
Mr. David Graybill
Ms. Molly Linville
Dr. Don McIsaac

RE: Columbia River Basin Salmon Management Policy C-3620

Dear Chairman Carpenter and Commission Members:

On behalf of the West Coast Seafood Processors Association (WCSPA), I am writing to encourage the Washington Fish and Wildlife Commission (Commission) to adopt the proposed reforms for managing the Columbia River Basin salmon fisheries as soon as possible in order to better achieve the goals and objectives set forth by Policy C-3620. WCSPA represents U.S.-owned seafood processing companies and supporting businesses in Oregon, Washington, and California. Several WCSPA member companies process commercially caught Chinook and coho salmon from the Columbia River so consumers throughout the West Coast and the rest of the United States can enjoy healthy, sustainable salmon from the Pacific Northwest. Chefs and restaurants in Seattle, Portland, and other metropolitan areas depend on the Chinook commercial fishermen provide and our members process and distribute. WCSPA offers our support for the reforms that have been proposed in the latest C-3620 document.

The Columbia River Basin Salmon Management Policy (C-3620), adopted by the Commission in January 2013, was intended to enhance *both commercial and recreational fisheries* on the Columbia River but, as we have testified on many occasions before, this has not happened. The commercial fishing sector has certainly lost out under implementation of the current Policy. We are certain that Policy reforms that emphasize adaptive management will help address some of this loss moving forward.

We also offer our assistance to the Commission and Department staff if any further information is needed to move forward and pass these reforms. We would like to commend both the Commission and the staff for their diligence and patience when trying to assess information and work with the best available science. Issues related to alternative gear and selectivity, among others, were addressed in the staff's November 2018 analysis, *Comprehensive Evaluation of the Columbia River Basin Salmon Management Policy C-3620, 2013-2017*. Comments in the analysis regarding economic harm were later supplemented by a staff economic report, which demonstrated the serious financial plight this policy has forced on our industry. The processing sector was not

included in the assessment, but this sector has also suffered losses. If there are any unanswered questions that Commissioners would like to explore, we would be happy to help; for example, we can provide additional insight about losses experienced by the processing sector. We believe that the Policy was set up to address these problems by means of adaptive management.

Many State, National, and International fisheries management programs rely on adaptive management to address changes related to the environment, socioeconomics, and management, among others. Adaptive management is a cornerstone of Policy C-3620, and we commend the Commission for explaining adaptive management in a page that accompanies the revised Policy document. Now is the time for the Commission to utilize this tool to overcome and correct the Policy's deficiencies and cease causing further harm to the commercial fishery.

We appreciate the Commission's consideration of our concerns and its efforts to develop reforms that provide fair and equitable management to both sport and commercial fisheries. We urge the Commission to adopt the proposed reforms as soon as possible. Please contact me at any time if you have any questions or if you would like to discuss this matter further.

Sincerely,

Lori Steele
Executive Director

From: 123ContactForm
To: Dobler, Myrtice C (DFW)
Subject: Contact the Policy Review Workgroup
Date: Saturday, July 18, 2020 11:42:10 PM
Attachments: CRW_questions_7.18.20.pdf

Name	Brian McLachlan
Email	bamclachlan@hotmail.com
Address	Portland OR
Comments	Please see attached comments/questions.
Attachment	https://www.123formbuilder.com/upload_dld.php?fileid=97004d130c218f92d0f35b96b956bd7f

The message has been sent from 137.118.193.244 (United States) at 2020-07-19 02:42:05 on Chrome 83.0.4103.116
Entry ID: 151

Brian McLachlan
Portland, Oregon
July 18, 2020

Washington Fish and Wildlife Commission
Columbia River Policy Workgroup
Submitted via https://wdfw.wa.gov/about/commission/columbia-river-policy-review

Re: Questions regarding Public Review Draft/CRW Recommendation

Dear Commissioners:

The Columbia River Policy Workgroup (CRW) has recommended revisions to Washington Fish and Wildlife Commission Policy C-3620 that materially deviate from the original policy (*See* Agenda Item 2.1. Public Review Draft). In order to better understand the rationale for the CRW's proposed policy revisions, and to provide more thoughtful comments to the full Commission, I request the CRW (in particular, Chair McIsaac) respond publicly to the following questions:

(1) After taking into account the direct public costs to the state (e.g., costs related to management, enforcement, research, and enhancement/hatcheries) as well as the indirect public costs (e.g., lost recreational fishing catch and opportunity; lost conservation/ecological benefits), what is the net public benefit (or cost) to the people of the State of Washington from the non-treaty commercial salmon fishery on the lower Columbia River? What specific data and analysis support your response?

(2) As noted in my comments dated June 8, 2020 (herein incorporated by reference), and in my testimony before the CRW, the Purpose and Guiding Principles sections of the Public Review Draft deviate from WDFW's legislative mandate as set forth in RCW 77.04.012. Please explain why these deviations are in the public interest. In particular:

(a) Regarding the Purpose section, please explain why it is in the public interest to "enhance" the "economic well-being" of the non-treaty commercial salmon fishing industry on the lower Columbia River.

(b) Regarding the Guiding Principles section, please explain why it is in the public interest in connection with the objective to "enhance the overall economic well-being and stability of Columbia River recreational and commercial fisheries," to include the following qualifier: "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"?

(3) With regard to the allocation of spring Chinook, why is it in the public interest to adopt the abundance-based provisions set forth in the Public Review Draft over the Long Term 80/20 recreational/commercial allocation envisioned in the original C-3620 policy? What net public benefits do you expect from the proposed allocation versus an 80/20 allocation? What specific data and analysis support your answer?

(4) With regard to the allocation of summer Chinook between the recreational and commercial fisheries downstream of Priest Rapids Dam, why is it in the public interest to adopt the abundance-based provisions set forth in the Public Review Draft over the Long Term 80/20 recreational/commercial allocation envisioned in the original C-3620 policy? What net public benefits do you expect from the proposed allocation versus an 80/20 allocation? What specific data and analysis support your answer?

(5) In the original C-3620 policy, the use of non-treaty gillnets for salmon was presumptively to be phased out entirely on the mainstem lower Columbia River. In the Public Review Draft, gillnets are allowed for spring, summer, and fall Chinook and coho.

(a) Why is it in the public interest to allow the use of gillnets in the non-treaty mainstem commercial fishery for spring Chinook? What net public benefits are expected from the use of non-treaty gillnets in comparison to not allowing gillnets to be used. Are there any conservation benefits (or costs) from the use of non-treaty gillnets on spring Chinook?

(2) Why is it in the public interest to allow the use of gillnets in the non-treaty mainstem commercial fishery for summer Chinook? What net public benefits are expected from the use of non-treaty gillnets in comparison to not allowing gillnets to be used. Are there any conservation benefits (or costs) from the use of non-treaty gillnets on summer Chinook?

(3) Why is it in the public interest to allow the use of gill nets in the non-treaty mainstem commercial fishery for coho? What net public benefits are expected from the use of non-treaty gillnets in comparison to not allowing gillnets to be used. Are there any conservation benefits (or costs) from the use of non-treaty gillnets on coho?

* * * *

In order to thoroughly consider your answers in drafting my comments to the full Commission, I would appreciate responses to my questions as soon as practical. Thank you for considering my request.

Best regards,

Brian McLachlan