

Exhibit F

Public Correspondence

**Public correspondence received as of
December 23, 2014**

From: [Chris Kern](#)
To: [Amanda Mckenzie](#)
Cc: [Ed Bowles](#)
Subject: FW: Sturgeon
Date: Tuesday, December 23, 2014 4:02:57 PM
Attachments: [2014 12-22 Sturgeon Ltr.pdf](#)

Goes with F as public comment.

Thanks.

From: ODFW Commission
Sent: Tuesday, December 23, 2014 3:57 PM
To: Bobby Levy; Mike Finley; Holly Akenson; Bob Webber; Laura Anderson;
greg.wolley@portlandoregon.gov; gregwolley@gmail.com
Cc: Curt Melcher; Ed Bowles; Chris Kern
Subject: FW: Sturgeon

Hello Commissioners:

Forwarding attached letter on behalf of the Coastal Conservation Association.

Regards,

Teri Kucera
Executive Assistant to Curt Melcher
Director's Office
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, Oregon 97302
Phone: (503) 947-6033
Fax: (503) 947-6042
Teri.Kucera@state.or.us

From: Kari Wallingford [<mailto:kari.wallingford@ccapnw.org>]
Sent: Monday, December 22, 2014 11:58 AM
To: odfw.commission@state.or.us; commission@dfw.wa.gov
Cc: Nello Pjcinich; Chris Cone
Subject: Sturgeon

Dear Commissioners,

Please see the attached letter from CCA Oregon and CCA Washington regarding Lower Columbia River sturgeon. Thank you for your service and we hope you have an enjoyable holiday season.

Thank you,

Kari Wallingford

Office Manager

Coastal Conservation Association Pacific Northwest

1006 West 11th Street

Vancouver WA 98660

360-694-4300





Coastal Conservation Association

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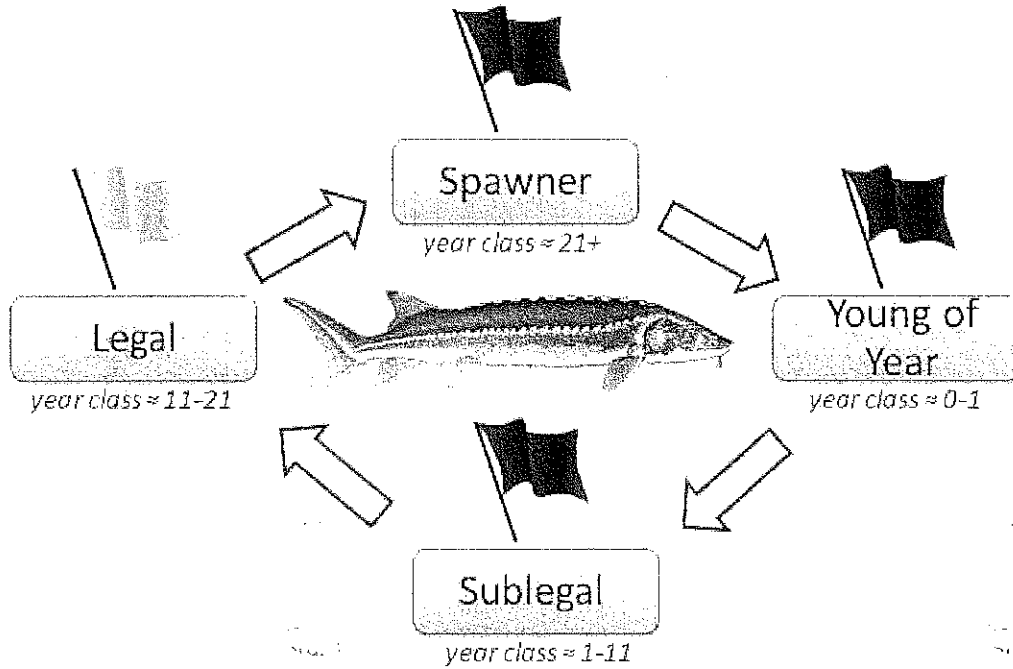
December 22, 2014

Oregon Fish & Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

Washington Fish & Wildlife Commission
600 Capitol Way North
Olympia, WA 98501

Dear Commissioners:

CCA Oregon and CCA Washington have been heavily involved in Lower Columbia River sturgeon management issues over the past six years. Our members have frequently testified at Commission meetings and we continue to be concerned with the overall health of the sturgeon population. After reviewing the most recent sturgeon population data, we would like to offer comments based on the four different age classes for which data has been provided. As the visual below suggests, data shows that three out of four age classes are in trouble and the fourth age class should be managed with caution. We hope you will consider this information and our recommendations as you consider any changes to sturgeon management in 2015.



Spawning Population

We believe that special attention should be placed on the overall health of this important age class. Unfortunately the estimate for the spawning population has fallen below the conservation threshold of 3,900 fish for three years in a row. According to the Lower Columbia White Sturgeon Conservation Plan, which was adopted by both states, this should trigger actions to address the decline. Conservation objectives outlined in WDFW’s 2014-2018 Lower Columbia River Sturgeon Management Policy (C-3001) also established guidelines to “increase the abundance of the spawning population” and harvest management to achieve “full representation of each age class within the population.”

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We believe greater attention must be given to the impact of non-sturgeon fisheries on the oversized, spawning population. Scientific studies have shown that stress induced by both angling and gillnetting can result in increased cortisol levels that in turn can cause egg absorption and poor spawning success. For the recreational fishery, the suspension of a retention fishery in 2014 has dramatically reduced the handle of sturgeon of all sizes, including the spawner population. However, the handle of spawner sized sturgeon has recently increased due to the intensive gill net fishery targeting fall Chinook in zones 4 and 5. Policy C-3001 requires WDFW to provide information related to Sturgeon by-catch in all fisheries as part of an annual review, but we are unaware of any official estimates from the agency.

However, in the 2012 fall Columbia River commercial gill net fisheries bycatch observation study by Holowitz and McHugh, an estimated 660 spawner size sturgeon were ensnared in zones 4 and 5 over 18 fishing days. In 2013 there were 29 fishing days in these zones which would have resulted in 1,063 spawner size sturgeon being unnecessarily handled. In 2014 there were 31 fishing days in zones 4 and 5 which would have resulted in 1,137 spawner size sturgeon handled as by-catch. It is likely that many of these sturgeon are caught in gillnets and released multiple times. In order to protect this critically important spawning population, we strongly recommend that the Commissions fast track the removal of gillnets from zones 4 and 5 and drastically reduce bycatch of sturgeon in 2015 and 2016 (note: the Columbia River Fishery Reform Policy currently allows gillnets to be used until 2017). Testing of alternative, selective commercial fishing gears have shown significantly lower encounters with sturgeon.

Young-of-the-Year (YOY)

Based on YOY test results, poor spawning productivity has occurred over the last four years. YOY testing has been in place for ten years below Bonneville Dam. Potential causes are from increased sea lion predation in recent years and impacts of stress from handle as mentioned above. As you may know, recent research by NOAA fisheries has suggested that sea lion predation on spring Chinook may be far greater than previously estimated. There are similar questions about the effect predation is having on sturgeon populations in the lower Columbia River.

Sublegal

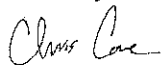
A review of the Frequency by Length Histograms depicts a declining percentage of sublegal sized fish in the 54-60cm class. Naturally, as these fish mature, we would begin to see the effect of these lower numbers in the form of inadequate recruitment to the legal age classes then subsequently to the spawning age class.

Legal

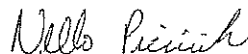
The 2014 legal population estimate using the ODFW set line method was 131,000 fish which is a dramatic increase from both 2012 estimate of 72,700 and the 2013 estimate of 114,000. This may be the one bright spot within the four different age classes, although a level of caution should be taken as there is a confidence interval of +/-60% with this data.

We applaud the steps you have taken in recent years toward the proper conservation of the struggling Columbia River sturgeon populations. We particularly commend Brad James (WDFW) and Chris Kern (ODFW) for their expertise on the topic. In order to preserve the long term health of this important fishery, it is our hope that the Commissions implement reforms to minimize, or eliminate, the unnecessary handle of sturgeon, particularly spawner size sturgeon, in commercial salmon fisheries. Moreover, we encourage the Commissions to continue taking a precautionary approach to managing this fishery due to uncertainties in population parameters and continued predation. If managed properly, it is our belief that we can rebuild this population and once again experience vibrant sturgeon fisheries in the lower Columbia River.

Sincerely,



Chris Cone, Executive Director
CCA Oregon



Nello Picinich, Executive Director
CCA Washington