



Memorandum

To: Oregon Fish & Wildlife Commission
Fr: The Conservation Angler
Dt: June 5, 2019
Re: Rescinding Oregon Administrative Rule 635—023-0090 regarding Barbed Hook Use During 2019 Columbia River Summer and Fall Fisheries

The purpose of this Memorandum is to provide a rationale for rescinding recent ODFW temporary rules permitting the use of barbed hooks in the Columbia River Fishery in 2019.

I. Lack of Due Diligence

The Conservation Angler believes that neither Oregon nor Washington have completed their due diligence justifying that the increased mortality impact from barbed hook use will not jeopardize or cause unauthorized take of ESA-listed chinook, sockeye or winter and summer steelhead in authorized Columbia Zone fisheries during 2019.

II. Impact of Fishing with Barbed Hooks versus Barbless Hooks

The US. v. Oregon Columbia River Fishery Management Agreement sets mortality rates for various fisheries. Part of that analysis and formula is used to assume and measure lethal impacts from fishery activities. While the scientific conclusions from years of study in many different fishery situations provide a range of results, fishery managers have adopted a higher two-percent (2%) impact rate for barbed hooks as compared to barbless hooks.

Oregon and Washington must model the impact of authorized fisheries using barbed hooks on the fishery impact limits on listed species. Sport-fishery impact limits on ESA-listed summer steelhead must not exceed two percent (2%).

The data underlying the forecasting of salmon and steelhead returns to the Columbia River suffers from multiple flawed assumptions, unacceptable margin of error ranges, excessive application of professional judgement and statistically invalid observation and creel census effort used to implement modeling runs and to estimate harvest impacts and exploitation rates. For these reasons, even the smallest of impact percentages are material to conservation.

While there may be justifiable reasons to consider changing specific sport fishing rules on the Columbia or even statewide, The Conservation Angler believes it was beyond the scope of the Bi-State Commission Sub-committee on the Columbia River Reforms to discuss or recommend specific sportfishing regulations. Further, it would be appropriate for the respective state commissions to allow for public testimony on this important conservation issue.

Suggested Motions

I, _____, of the Oregon Fish and Wildlife Commission, move to exclude OAR 635-023-0090 allowing the use of barbed hooks in Columbia Zone Fisheries from the list of Temporary Rules presented to the Commission by ODFW Director Curt Melcher for adoption.

And then,

I, _____, of the Oregon Fish and Wildlife Commission, move that Oregon rescind OAR 635-023-0090 allowing the use of barbed hooks in Columbia Zone Fisheries and urge the Washington Fish and Wildlife Commission to rescind their rule allowing the use of barbed hooks in the Columbia Zone so that fishing regulations will be concurrent and more conservation-oriented.

Temporary Rule in Question:

635-023-0090

Allow Barbed Hooks When Angling for Salmon, Steelhead, and Trout in Columbia River Zone

Adopted May 30, 2019: effective June 1, through November 27, 2019.

Amended rule removes prohibition on use of barbed hooks when angling for salmon, steelhead, and trout in the Columbia Zone. Rule follows adoption of this rule by WDFW and ensures that Columbia River fishery regulations will remain concurrent between OR and WA.