



Joint-State Columbia River Salmon Fishery Policy Review Committee (PRC)

**Public Comments (non-form letters) received
as of November 6, 2019, for the November 18 meeting**

8 a.m. – 5p.m.

Washington Department of Fish and Wildlife Region 5 Office
5525 S 11th St Ridgefield WA 98642

From: [Blaine Ackley](mailto:Blaine.Ackley@odfw.com)
To: ODFW.Commission@state.or.us
Subject: Salmon Enhancement
Date: Friday, October 18, 2019 8:03:35 PM

Dear Commissioners,

I have been a licensed Oregon sport fisherman for many years.

I have been actively following the salmon enhancement issues before the ODFW and the Commission.

In that time, except for one year, we have seen salmon forecasts come up short in most cases. What does that mean? For the last 9 years I have been paying a salmon enhancement fee to remove the kill nets from the Columbia River. Yet the kill netters are still netting on the main stem of the river while the resource is in decline.

It means that it is time for you commissioners to exercise your power to direct the agency to do the right thing and begin protecting our resource.

So what can you do?

I recommend you do the following:

- 1) Direct the agency to move the kill nets off the main stem of the river.
- 2) Direct the agency to change the algorithm it uses to forecast fish returns because it has been overly optimistic.
- 3) Direct the agency to begin a buyout program for the kill netters.

Then finally, I want you to direct the agency to re-consider the effects of a fish closure on the resource in general. Specifically, when the closures for Buoy 10 chinook went into effect on August 20th this year, I saw so many fish being returned to the water because they were chinook and not coho. I do know that the guides suffered from the same circumstances. So what can be done?

I recommend that when the a fish closure happens to avoid all this needless fish handling, allow any license holder to keep just one fish. Whatever the fish may be, the fisher person can only keep that first fish they catch. That's it, one fish and you have your limit.

I don't envy you in your job and I respect your public service but it is time to respect the sport fisherman. You should know if you don't already know that sport fishing license fees pay the bill for over half of the ODFW budget. The fees are already too Highland we get less opportunity every year. There are only about 125 kill net permit holders and those fees pay less than 5% of the budget so let's get some opportunity to the people who pay the bills, the sport fisherman.

Thank you,
Blaine Ackley
Hillsboro, Oregon

From: [Charles Loos](#)
To: [ODFW Commissioners](#)
Subject: Oppose increased gillnetting in Columbia River
Date: Saturday, October 19, 2019 7:40:03 PM

Dear ODFW Commissioners,

With steelhead and salmon runs diminishing, I opposed gillnetting on the Columbia River. The bi-state reform program of a few years back was a good plan for phasing out gillnets. As a sports fisherman, I paid for a Columbia River Endorsement on my license to fund the program. Please honor the bi-state agreement, and get gillnets off the Columbia River.

Sincerely,

Charles Loos
3421 SW Primrose St
Portland, OR 97219
looscharles@gmail.com

From: [Robert Sudar](#)
To: [ODFW Commission](#)
Subject: Information regarding the Columbia River Policy
Date: Monday, October 28, 2019 10:13:39 AM
Attachments: [2019-10-21 Letter to Commissions Regarding Columbia River Policy and WDFW Funding.docx](#)

The Washington Fish & Wildlife Commission is planning to delay their decision on the Columbia River Policy, despite long-standing plans by the Policy Review Committee (PRC) to complete their work in November and have a submission for the Commissions in both states to consider and vote on at their December meeting. After hearing the Washington Commission speak to this issue last week, along with public testimony, I wrote the attached letter to clarify what I felt was mis-guided reasoning and some serious factual errors. I recognize the importance for concurrency in both states regarding Columbia River salmon management, so I am sharing my letter with your Commission members, too. It is imperative that Oregon consider and vote in December on any recommendations put forth by the PRC. Feel free to contact me if you have any questions about the statements in my letter. Thank you.

Robert Sudar, Longview

October 26, 2019

To: Washington Fish and Wildlife Commission

From: Robert Sudar, Longview

Re: Commission decision to postpone Columbia River Policy vote

Commissioners:

I was extremely disappointed to hear at the Friday, October 18th Washington Fish & Wildlife Commission meeting a decision to postpone possible Columbia River Policy reforms until 2020, at the earliest, instead of making them in Bellingham in December, per planning decisions agreed to earlier this year. This decision is unfair to our commercial gillnet fishery, unfair to the public that looks to us for access to the salmon resource they own, and unfair to the many participants in the Policy Review Committee (PRC) process who have been trying to meet the previously agreed-to schedule. That committee is reviewing the performance of the Policy over the last seven years, as described by staff policy reviews in both states since 2017, and applying the Adaptive Management provisions contained within the Policy and championed by every Washington F&W Commission member in their 2013 testimony when the current Policy was approved. Those provisions were included to verify that conservation of the salmon resource is prioritized and that the economic stability of both the recreational and commercial fishing industries on the Columbia is maintained within the natural variability of salmon returns.

I attended the Fish Committee meeting on Thursday the 17th, testified at the Friday Commission meeting and listened to the recorded public testimony on Saturday, the 19th. There were several continuing themes I heard from opponents of our commercial fishery – the March Commission decision was rushed, it was a surprise that a vote was even taken in Spokane, the Commissioners were confused about what they were voting on, the decision was a betrayal of sport fishing advocates, and that the Coastal Conservation Association (CCA) and similar groups pulled their support for increased recreational license fees and the Columbia River Endorsement last legislative session because of the March vote in Spokane. I would like to shed some light on those claims.

First off, there was no surprise about the vote in March. It was clear months before, through Commission planning at prior meetings, that the Policy Review Committee would start their meetings in January and work for a decision at the Spokane meeting, before the beginning of the North of Falcon process. We questioned the location when it was first determined but were told that was simply how the planning would work out. The Spokane location was just as inconvenient for commercial representatives as for recreational, but some gillnetters did testify in Spokane.

The PRC proposal, decided at their February 26th meeting, was included in the Commission meeting agenda and handouts, and was also discussed in the staff report. The Commission vote was on one of the options in the staff report. During the Working Group sessions in 2012 that led to the current Columbia River Policy, it was typical to get critical information about the proposals just a few days, or less, before a meeting, and yet that whole process was initiated and completed in two months time. The current PRC process has been much more deliberate, informative and transparent.

The discussion about concurrency between Washington and Oregon ignores some of the recent history of that relationship. In January of 2017, the Oregon Commission voted for a Policy update that did not move to the original “long term” plan and that was less restrictive on the commercial fishery than what Washington had approved several weeks earlier. However, Oregon Governor Brown insisted that her Commissioners reconsider that decision and align with Washington under threat of removal from the Commission. Their second vote in March of 2017 came closer to Washington’s and allowed for concurrent management, despite some differences in the specifics.

The CCA and its allies did not support the hunting and fishing fee increase bill in Washington in 2019 either before the March vote or after. In fact, they haven’t gone on record to support any such bills in recent years. Using the March vote as a reason for their opposition distorts the truth. They have supported an increase in General Fund monies, but not license increases. The loss of support for the Columbia River Endorsement renewal was a reflection of their

desperate attempts to pass anti-gillnet bill SSB 5617, losing sight of the need for the endorsement renewal in the process.

There are other examples of this behavior. In 2014, then-Director Phil Anderson called a meeting of numerous salmon user groups, asking for their support for a letter he was drafting to request that Mitchell Act funds be maintained at the current level, at least, in order to maintain hatchery production levels in the Columbia that are essential for treaty obligations, but also for sport and commercial fishing opportunity. All of the commercial groups signed on to the letter. CCA and some other anti-commercial groups invited to the meeting did not. The letter was part of a successful campaign that ultimately did maintain the funding, but it was a clear example of who really does support the agency.

There was mention that the policy updates approved by the Washington Commission in March “moved the goalposts”, allowed for “non-selective gillnets in all seasons” and would reduce the escapement of wild summer Chinook, which are not an ESA-listed stock. The true goals in Columbia River salmon management involve utilizing the best available science to recover ESA-listed salmon, to ensure adequate spawners for all runs, and then to provide fisheries for recreational and commercial fishermen. The allowable ESA impacts, as established by the National Marine Fisheries Service, are the “goalposts” that determine if those first two goals can be met while still allowing harvest. Which user groups fish, and how they share the impacts, does not change the basic conservation goals or the likelihood of achieving them. The 2018 staff review showed that. It also showed that harvest ultimately had little measurable impact on reducing PHOS.

Repeatedly using the term “non-selective gillnets” is misleading, but a convenient tool for groups like CCA. In reality, gillnets are selective by design. There is no season in which gillnets are used on the Columbia where they are not “selective” in targeting one salmonid and avoiding another. It’s not just about release mortality. It’s about avoidance, too, the most effective means of selectivity. Where gillnets are used, when they are used, and which size of mesh opening is in the net are all ways to use them selectively, and there is abundant data to verify this claim and its success. The tanglenets used in some seasons to lower the release mortality rate are already an “alternative gear” that the fleet readily adopted when tasked with making them work because they are relatively inexpensive to make, the same type of gillnet boats can be used to fish them and they are economically viable for the fishermen.

Finally, claiming that allowing the non-tribal fleet to use gillnets to fish for summer Chinook will threaten the adequate escapement of wild spawners is simply another misleading statement. The ocean fisheries, which harvest many more summer Chinook than the in-river gillnet fleet, keep both wild and hatchery fish, as does the even larger tribal fishery above Bonneville. There is no evidence that the non-tribal gillnet fishery, which hasn’t been provided any harvest because of this Policy since 2016 but which has always been allowed to keep both hatchery and wild salmon, has had any significant negative impact on the viability of the wild summer Chinook population.

No staff testimony has ever been offered that shows that commercial harvest is a problem for recovery, or that managers said they couldn’t manage the harvest effectively with a gillnet fishery. If the Commissions in 2012 had bothered to look at the science, instead of just the politics, they could have foreseen why this Policy would prove to be a failure. Seven years later, decisions like the Commission’s vote in March are finally reflecting the science and redirecting Columbia River salmon management, via the Adaptive Management provisions included in the Policy, to a process that values both sport and commercial fisheries, seeks ways to keep each compatible with the salmon recovery guidelines established by NMFS, and considers the needs and interests of all citizens in the Northwest, not just those who choose to catch their own salmon with a rod and reel. I ask you to support the decisions of the PRC and bring their recommendations to a vote in December, as had been clearly planned for months.

Robert Sudar, Longview

Columbia River Commercial Advisor

From: [Jack Morby](#)
To: [ODFW Commissioners](#)
Subject: Please Continue the Columbia River Fishery Reforms and Keep Gillnets in the Select Fishery Off Mainstem Columbia
Date: Saturday, October 19, 2019 8:30:02 AM

Dear ODFW Commissioners,

I urge the commission to continue with the Columbia River fishery reforms as originally negotiated and continue with original bi-state agreement with Oregon and Washington. It is paramount that we do everything possible to continue to protect the Salmon and Steelhead fishery in the lower Columbia River below Bonneville Dam. Ignoring the efforts of conservation while fisheries are in decline is a disservice to all who enjoy this resource.

Non-selective gillnets do not belong in the lower Columbia River fisheries where endangered salmon and steelhead are present. They need to remain in the selective fishery as originally negotiated. Gillnets do not selectively harvest hatchery fish, and place wild salmon and steelhead populations requiring conservation at risk.

All fishery users must fully transition to fisheries capable of selective harvest - recreational and commercial - to harvest more hatchery and healthy wild stocks of salmon and protect the endangered salmon and steelhead runs. Our endeavors should be to enhance wild salmon returns to their historic spawning grounds with the intent to increase their numbers.

The bi-state reforms are the result of significant effort and compromise, including increased hatchery production to benefit gillnet harvests in off-channel areas. Efforts to undo the reforms put this hatchery production and the funding available for Columbia River salmon management at risk. Efforts to extend Washington's Columbia River endorsement fee were rejected by their state legislature and Oregon's endorsement may have the same outcome if the original Columbia River reforms are not continued.

I urge you to reject any further efforts to abandon the Columbia River reforms and hold the agencies accountable for their implementation.

Sincerely,

Jack Morby
5460 SW Dolph Dr
Portland, OR 97219
morby517@aol.com

From: [Michole Jensen](#)
To: odfw.commission@state.or.us
Subject: Columbia River Salmon Harvest
Date: Wednesday, October 2, 2019 12:04:47 AM
Attachments: [KayakFlyAngler_Outlines_noDotsmall.png](#)

Can somebody on the commission or at ODFW explain why the Columbia was closed to recreation salmon fishing and open to commercial netting?

https://www.dfw.state.or.us/fish/OSCRP/CRM/CAN/19/190925_notice.pdf?fbclid=IwAR3pzdj-P24i9yr4qRqqjEKzVkPGgoAKDY-MEjQYCAN_ETQHN4LLJFWkz3s

What is the financial rational of something like this?

Michole Jensen
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www.Kayakflyangler.com

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From: [Richard Preston](#)
To: [ODFW Commission](#)
Subject: Confronting last fish logic.
Date: Tuesday, October 15, 2019 4:13:43 PM

First of all, let me thank you for easy access via email. Washington's "Contact Us" does not give any email address for opinions, etc. Good job.

I think we're missing the point on salmon recovery. The goal should be to fill the Columbia with as many salmon and steelhead (ss) as we can, regardless of wild or hatchery. There is no way to verify that by depleting the river of warmwater species that the salmon runs/steelhead runs (ss) will rebound to acceptable levels of native fish. Even if we remove all the dams we can't guarantee ss runs will rebound and thrive.

We can deplete the river of all fish, remove all dams, and manage ss to the last native ss and finally prove it is not possible to guarantee native ss stock's survival. Here is the last fish biologist logic:

If we take out the dams the salmon will return. If not, we catch the last walleye, then salmon will return. If not, then we can work on catching the last bass. Then catfish...Then the last carp. Then the last sucker...

When the last ss is dead, and there are no dams, and the rivers are empty of all fish, the useless last fish logic will finally be exposed for the fraud it is and the Endangered Species Act to which it spawned. This slippery slope ass-backwards leadership is ridiculous. Emptying the Columbia of fish to save salmon is the stupidest idea I've ever heard because biologists can't control the variables to prove which one controls ss recovery.

People want the river full of salmon. To hell with genetic purity. All salmon came from the original gene pool. This gene pool varied itself once ss could get past Bonneville falls again, long before the dams. Mixing the hatchery gene pool with the supposed native gene pool is a plain lie, because the native gene pool has been mixed, mixed over and over, for tens of thousands of years at least. We must confront the gene purity and last fish logic and the application of the Endangered Species Act: we need fill the rivers with a strategy we know will ensure ss recovery.

Lets tell the Endangered Species Act to go to hell on salmon and steelhead purity. Lets line the coast with hatcheries and canneries. Lets let every small town and large put in as many hatcheries as they can and want to.

Let them have salmon derbies up and down the Columbia. Lets make the Columbia world famous for the record number of salmon that go up it. Billions in tourism and food for every income level.

To do that someone has to have the balls to stand up to the last fish logic and say that we want new science on ss. We dont give a damn if they are native or not. We want to insure the survival of ss as we know how. Now. Fill the rivers.

Please forward this to Washington Fish and Wildlife Commission for their Saturday meeting.

On Mon, Sep 30, 2019, 11:29 AM ODFW Commission <ODFW.Commission@state.or.us>

wrote:

Thank you for your comments on this issue. Your message will be forwarded to the Oregon Fish and Wildlife Commissioners for review and any necessary response.