



NORTHWEST SPORTFISHING
INDUSTRY ASSOCIATION

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July 29, 2020

Washington Fish and Wildlife Commission

Re: Columbia River Workgroup Public Review Draft (CRWPRD)

Honorable Fish and Wildlife Commissioners,

On behalf of the Northwest Sportfishing Industry Association, I am writing in opposition to the Columbia River Workgroup Public Review Draft (CRWPRD) and its abandonment of the bi-state Columbia River Reforms and Policy C-3620. NSIA supports full implementing the guiding principles of the original bi-state Reforms and Policy C-3620 for the conservation, economic, bi-state concurrence, conflict management, and public confidence and trust of the agency rationales set forth below.

Columbia River fisheries deserve a new beginning that emphasizes the best and most appropriate use of this river's limited fishery resources. This must start with a recognition that the stakeholder base has changed together with a commitment to better serve our mutual stakeholders. **The CRWPRD proposed policy asserts a 1940 management regime on a 2020 fishery that's changed vastly over 80 years.** There is a tacit assumption in this proposed policy that nothing has changed when in fact we can all agree that this landscape is vastly different. This change has brought use, economic, fisheries management and considerable conservation funding and support from recreational anglers--your customers and the future of these fisheries. The draft proposed policy direction largely ignores the recreational community, those who are essential to the future for the recovery of wild salmon and of this world class fishery.

NSIA is a trade organization consisting of hundreds of businesses that provide thousands of family wage jobs in the Pacific Northwest and beyond. NSIA staff and members have been working on Columbia River salmon recovery issues since our inception in 1993. Along with hydro and habitat improvement, predation reductions, and mass marking of hatchery produced fish, a central focus of our effort to protect and restore Columbia River salmon and steelhead has been to advocate for mark-select, live-release fisheries. Simply put, all other recovery efforts are for naught if enough wild fish do not make it back to their natal streams to spawn. Mark-select, live-release fisheries greatly enhanced all user groups' abilities to optimize the harvest of hatchery fish while meeting conservation objectives for the recovery of wild stocks.

Conservation

It has long been acknowledged that mainstem non-treaty gillnetting needs to be phased out. In 1993, the National Marine Fisheries Service (NMFS) issued a recovery plan (pertinent language attached) calling for: 1) visual marking of hatchery fish; 2) elimination of mainstem nontreaty gillnet fisheries by 2003; and 3) moving commercial fisheries into terminal areas. The Bonneville Power Administration and the North West Power and Conservation Council agreed with

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this strategy, which was a driving force for the funding of the off channel SAFE area program. While most of the successful off channel commercial fisheries are on the Oregon side of the river, these areas are open to commercial fishers from both Washington and Oregon. The purpose of the SAFE area programs is to allow gillnet fisheries to target returning hatchery fish in these off-channel areas with minimal impact on at-risk and ESA listed wild stocks. The SAFE area programs are funded primarily by taxpayers, ratepayers, and Oregon recreational anglers, and the numbers of hatchery fish planted in these areas to benefit commercial fishers has increased significantly since the Columbia River Reforms were enacted.

In addition to wild fish spawning numbers, in recent years, the proportion of hatchery fish spawning in the wild (pHOS) has emerged as a key conservation issue. Many Columbia River tributaries are under-escaped for wild fish. As a result, hatchery production in a number of areas has been unfortunately been reduced in an effort to achieve pHOS objectives. It is vital to all user groups (sport, commercial, and tribal; in-river and ocean) that we protect the future of our hatchery production, by moving to live release, mark selective fisheries.

Sport anglers, conservationists, landowners, and many elected officials do not understand the logic of increasing mainstem nontreaty gillnetting, which is proposed in the CRWPRD. Especially when sockeye returns to Idaho are currently less than 40% of the ten-year average; steelhead over Lower Granite are currently less than 30% of the ten year average; returns of the truly magnificent and once abundant wild B-Run steelhead have dropped into the hundreds; and in 2019, wild spring Chinook returned to Idaho at their lowest levels since 1999 (data [from fpc.org](#) and [2020 Joint Staff Report](#)). You will also hear from many (including WDFW staff) about a number of tributaries in the mid-Columbia that are under-escaped for wild summer Chinook. But moreover, the CRW recommends increasing wild-kill gillnet fisheries. We, and many others, just don't get it.

Another conservation concern from the use of gillnet gear is bycatch. Over the years observed fishery data has shown that frequently, more fish (wild and hatchery steelhead, wild chinook, sockeye, sturgeon and other species) are discarded than kept. As an example, the only noteworthy monitoring on a mainstem Summer Chinook gillnet fishery was done in 2010. The bycatch was nearly 1 to 1 (kept vs. discard) and did not include any data on the number of released sturgeon. Also notable was the fact that a healthy portion of the catch was sockeye, 20 Sockeye per 144 chinook. That fact that Sockeye are smaller than most steelhead defies the assertion that smaller salmonids swim through 9" mesh gillnets.

Are there not other less wasteful, less impactful, approaches to commercial harvest?

Economics

The Columbia River basin is the largest salmon and steelhead producing river in the lower 48, and the health of its fisheries is essential to the health of the sportfishing industry in Washington, Oregon, and for many companies outside of our region.

Especially important to the sportfishing industry are the in-river spring, summer and fall recreational fisheries for Chinook salmon. These fisheries generate an average of over 350,000 annual angler trips and supplying tremendous economic benefits. Indeed, over the years, fisheries on some Chinook stocks have averaged roughly ***nine angler fishing trips —nine trips — for every salmon harvested selectively!*** Citing a 2016 survey by the U.S. Fish and Wildlife Service, the Oregon Department of Fish and Wildlife (ODFW) recently reported a national average recreational fishing trip expenditure of \$101 per day. See ODFW, Notice of Proposed Rulemaking, Sport Fishing

Regulations, filed June 10, 2020. Nine trips at \$101 per trip is over \$900 in trip expenditures per hatchery salmon kept in the lower Columbia spring and summer Chinook fisheries. Truly, spring and summer Chinook salmon are worth their weight in gold to rural communities and the sportfishing industry throughout our region. Why would it be good public policy to reduce the economics that derive from these recreational fisheries?

Furthermore, the trip expenditure metrics cited above do not capture expenditures for durable goods, such as rods, reels, boats, trailers, motors and marine electronics -- many of which are manufactured and sold here in our region specifically for the unique salmon fisheries offered in Washington State. **From boat builders in Clarkston, to rod manufacturers in Woodland, to tackle manufacturers in Longview, Snohomish and Selah, to name just a few, Columbia River sport fisheries sustain small businesses across our great State.** Moreover, durable good purchases, which are unaccounted for in the trip expenditure economic impact metrics used in the CRW process to evaluate options, accounted for over 60% of recreational angler expenditures in an evaluation of economic impacts prepared for WDFW. TCW Economics. 2008. Economic analysis of the non-treaty commercial and recreational fisheries in Washington State. December 2008, Sacramento, CA. With technical assistance from The Research Group, Corvallis, OR. p. ES-3.

These facts led to the bi-state Reform agreement and Policy C-3620 that prioritized the mainstem Columbia River to sport fisheries. Substantial recreational expenditures, combined with relatively low harvest per trip (one fish per 9 trips), and low wild fish release mortality simply allows for many more hatchery fish to be accessed and removed with far more economic impacts and benefits than a gillnet fishery.

Conversely, the SAFE area gillnet fisheries allow for a very large number of hatchery fish to be harvested for a relatively low impact on the 13 ESA-listed stocks swimming through the mainstem. The SAFE area fisheries have grown so successful for gillnetters that harvest numbers for January 1 through July 31 are consistently more than for the sport fleet in the 140-mile-long lower mainstem fishery during the same time frame.

The policy revisions proposed by the CRW will result in reduction of sportfishing by as much as 25%, precipitating the loss of thousands of angler trips annually – perhaps substantially more. The economic impact of these reductions will harm the sportfishing industry statewide, and communities along the river that depend on them. It's important to put this negative impact in context: 2020 sport fisheries below Bonneville dam are turning out to be some of the shortest seasons in decades because of the low numbers of wild fish and the closures related to COVID-19. Puget Sound fisheries have been dramatically cut in 2020 also. In contrast, commercial fisheries were deemed essential and allowed to continue to operate under COVID-19 regulations while the sportfishing industry was dealt a full, statewide closure of fisheries for over a month. Another piercing blow to Washington's sportfishing industry was WDFW's interpretation of the CARES Act disaster funding, for which NSIA was not consulted. Apart from charter boat operators, WDFW excluded the rest of the sportfishing industry from the \$50 million to be dispersed. In contrast, ODFW determined that other sectors of the sportfishing industry could apply for relief if they met the program criteria.

To an industry that employs over 16,000, pays nearly \$120 million in state and local taxes, helps sell licenses to over 900,000 resident and nonresident anglers, and pays a considerable excise tax,

this proposal to significantly reduce sportfishing opportunity is a slap in the face and makes no economic nor public policy sense. It leaves industry leaders wondering if Washington State truly values the sportfishing industry.

Bi-State Concurrence and Collaboration

In March of 2017, the Oregon Commission (including gillnet lobbyist, Bruce Buckmaster) voted unanimously to adopt its current regulations. In October of 2019, the Oregon Commission decided to discontinue its participation in the bi-state Columbia River Policy Review Committee. Recently, on Columbia River Compact calls, we hear the apparent unwillingness of Washington's representative to collaborate and compromise with Oregon on fisheries that were agreed to pre-season. We believe that the dogged pursuit of the proposals in the CRWPRD to turn back the clock is a major contributor to the deteriorating management environment on these Columbia River Compact calls.

Conflict Management

It is our sense that the State of Oregon remains satisfied with its current policy and is not interested in reopening the conflict that for far too long has, consumed incredible amounts staff and stakeholder time. Agency staff, two Oregon Governor's offices, Legislators and stakeholders worked to bring about the Reforms that were adopted by both Commissions in large part to resolve longstanding conflicts over fishery management in the Columbia River. Since abandoning the bi-state PRC work group, ODFW staff and the Oregon Commission have used their resources to, among other things, consider and adopt climate policies and promote an effort to develop matching funds for the now fully-funded Land and Water Conservation Fund. The Washington Commission has many short- and long- term challenges ahead as well. These challenges would greatly benefit from passionate and supportive recreational angler and sportfishing industry constituencies.

Public Trust and Confidence

Is it the best public policy to try to turn back the clock, repeal fundamental elements of the Reform Policy, and reignite conflicts with stakeholders, landowners, the conservation community, and elected officials? The proposed policy revisions would provide less conservation of wild stocks, decrease the overall economic benefits of the fishery to the State of Washington, harm jobs in the sportfishing industry, and erode public trust and confidence in WDFW and the Commission. Is this really the best "path for a new era"?

On behalf of NSIA, we ask that you reject the proposals in Public Review Draft recommended by the CRW and instead pursue full implementation of the guiding principles from the original bi-state Columbia River Reform management agreement and Policy C-3620.

Thank you for the opportunity to comment,


Liz Hamilton, Executive Director
NSIA

Proposed Recovery Plan for Snake River Salmon SUMMARY



Salmon and Wildlife Photographs copyright 1994, Natalie Fobes



U.S. Department of Commerce
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

March, 1995



2.11.b.	3	hypotheses.	
HARVEST MANAGEMENT			
3.1	1	INCREASE ADULT ESCAPEMENT FOR SNAKE RIVER FALL CHINOOK BY MODIFYING EXISTING OCEAN HARVEST MANAGEMENT RULES	Four years
3.1.a.	1	Implement a management strategy for PSC fisheries that is responsive to stock abundance and consistent with the PSC's objective to attain, by 1998, naturally spawning chinook escapement goals in a rebuilding program begun in 1984.	PSC

TASK NO.	PRIORITY	RECOVERY TASKS	RESPONSIBLE ENTITY	DURATION
3.2	1	INCREASE ADULT ESCAPEMENT FOR ALL LISTED SPECIES BY MODIFYING EXISTING INRIVER HARVEST MANAGEMENT RULES		
3.2.a.	1	Modify the CRFMP to incorporate explicit management criteria that protect listed Snake River sockeye, Snake River fall chinook, and Snake River spring/summer chinook salmon.	Parties to the CRFMP, State of Idaho and Shoshone Bannock Tribes	Three years
3.3	3	PROTECT ALL LISTED SPECIES BY DEVELOPING HARVEST MANAGEMENT RULES TO ACCOUNT FOR FUTURE FISHERIES		
3.3.a.	3	Modify the CRFMP to incorporate management rules that will eventually allow for expanded harvest of sockeye salmon and upriver spring and summer chinook consistent with long-term recovery objectives.	Parties to the CRFMP, State of Idaho and Shoshone Bannock Tribes	Two years
3.3.b.	3	Develop Snake River subbasin harvest management plans that are consistent with long-term recovery objectives for listed spring/summer chinook salmon. Resolve legal restrictions limiting implementation of subbasin harvest plans.	NMFS, FWS, BIA, Oregon, Washington, Idaho, and The Nez Perce, Umatilla, and Shoshone-Bannock Tribes	Four years
3.4	3	PROTECT ALL LISTED SPECIES THROUGH DEVELOPMENT OF ALTERNATIVE HARVEST METHODS		
3.4.a.	3	Evaluate the size selectivity of current harvest regulations and evaluate the potential of increasing stock productivity by regulating size limit and mesh size limitations.	The PFMC Salmon Technical Team and CRFMP TAC	Two years
3.4.b.	3	Investigate opportunities for increasing terminal area fisheries.	The CRFMP TAC	Ongoing
3.4.c.	3	Continue research and development of a low-cost visual mark that can be applied on a massive scale with minimal handling mortality.	Private industry, fishery agencies, and tribes	Ongoing
3.5	3	PROTECT ALL LISTED SPECIES THROUGH REDUCTION IN HARVEST CAPACITY		
3.5.a.	3	Initiate a buy-back program designed to reduce harvest capacity of the Oregon and Washington commercial troll fishery by 50% and eliminate non-treaty gillnet fishing in the mainstem Columbia River.	Oregon, Washington, NMFS	Eight years
ARTIFICIAL PROPAGATION				
4.1	1	CONSERVE REMAINING SNAKE RIVER SALMON GENE POOLS THROUGH CAPTIVE PROPAGATION/SEED BANK PROGRAMS		