



September 7, 2020

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

Dear Chair Carpenter and Commissioners,

Thank you for the opportunity to comment on the Commission's review of Columbia River Salmon Fishery Management Policy (C-3620). On behalf of the Wild Steelhead Coalition's thousands of members, we are writing to express our strong opposition to the June 10, 2020 recommendations by the Commission's Columbia River Workgroup (CRW). With the Columbia's wild steelhead and salmon populations struggling and facing increasingly imminent threats such as climate change and habitat loss, the last thing these declining salmonid stocks need is the expansion of destructive gillnet fisheries on the mainstem lower Columbia River. Therefore, we urge the Commission to reject this misguided proposal.

The Columbia once boasted the strongest run of salmonids in the world. However, over the last century, these once abundant fisheries have been reduced to a fraction of their historic size. As a result, a new, disturbing tradition has emerged on the Columbia where every summer anglers are treated to a round of heartbreaking news about historically low runs and emergency closures, rather than the most prolific salmonid runs on the planet.

There are many causes of this salmonid decline, but irresponsible fishing practices are at the top of the list, which is why it is so confounding that the CRW would decide to reinstate destructive gillnet fisheries for spring and summer kings in the mainstem. By restoring year-round gillnetting to the mainstem lower Columbia River, the CRW is greenlighting a non-selective fishery that generates high levels of lethal bycatch and will further endanger ESA-listed salmon and steelhead.

Particularly troubling is that alternatives to antiquated gillnet fisheries that are less impactful on ESA-listed fish do exist, such as pound nets that have been demonstrated to cause almost no incidental mortality. Therefore, rather than doubling down on non-selective commercial fisheries that will further imperil ESA-listed species, the state should be investing in the widespread implementation of these more sustainable fishing practices. Not only would the implementation of selective harvest practices protect ESA-listed fish, it would also help ensure a more enduring and prosperous fishery for both the commercial sector and recreational anglers.

In addition to the aforementioned issues with the CRW's recommendations, we are also concerned about the impacts these policy changes could have on the concurrent management of the Columbia River between the states of Oregon and Washington. It is essential that this foundational management partnership continue, and we do not want these policy reforms to endanger this critical co-management.

Considering the current state of the Columbia's steelhead and salmon runs, as well as the fact that their survival is only going to become increasingly difficult due to climate change, we need to be doing



everything we can to eliminate threats to salmonid recovery and responsibly manage our fisheries. Unfortunately, the CRW's recommendation to restore gillnet fisheries represents a massive step backwards in responsible fisheries management, as it would reinstate a major driver of salmonid decline. As a result, we strongly encourage the Commission to reject the CRW's proposal.

Thank you for your consideration of our comments and for your work to protect wild steelhead and salmon in the Columbia Basin.

Sincerely,

Greg Topf  
Board of Directors  
Wild Steelhead Coalition