



May 6, 2021

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Governor Inslee,

We strongly support the \$2 million voluntary non-tribal gillnet buyback and Columbia River fishery reform proviso included in Section 308(18) of the 2021-2023 Operating Budget for the Washington Department of Fish and Wildlife (WDFW). We believe the proviso represents the best opportunity to advance efforts by Washington and Oregon to improve the sustainability of Columbia River salmon fisheries in support of the conservation and recovery of wild salmon and steelhead populations.

The budget proviso represents an appropriate and necessary policy correction of the Fish and Wildlife Commission. Last September, the Washington Fish and Wildlife Commission (WFWC) voted 5-4 to return non-selective commercial gillnets to the mainstem lower Columbia River. The decision to drastically increase non-tribal gillnetting during the spring, summer and fall seasons is inconsistent with the conservation needs of wild Columbia River basin salmon and steelhead. The Commission made the decision despite opposition from [conservation organizations](#), [county governments](#), over [120 sportfishing organizations and businesses](#), and [nearly 40 members of the legislature](#).

Today, activist members of the WFWC continue their relentless drive to pressure Oregon to adopt the misguided policy to drastically increase mainstem gillnetting – even as the Oregon Commission has sought to focus instead on the conservation and recovery needs of Columbia River salmon and steelhead. More recently, the same members of the WFWC have worked to undermine the implementation of alternative, selective commercial fishing gears. A veto of the proviso would serve as a tacit endorsement of the controversial WFWC policy and the continued efforts by these commissioners to rollback harvest reforms. We do not believe you share these views.

The budget proviso will improve the conservation of wild and ESA-listed Columbia River salmon and steelhead. Preventing the return of mainstem non-tribal gillnetting during the spring and summer will result in additional escapement of ESA-listed spring Chinook and wild summer Chinook, compared to the WFWC policy, and reduced mortalities to steelhead and sockeye caught as bycatch in mainstem gillnet fisheries. It would also reinforce the importance of maintaining current mark-selective recreational fisheries, which help to improve the proportion of wild salmon reaching the spawning grounds consistent with conservation and recovery objectives.

In the fall, the proviso's reduction in mainstem gillnetting provides an opportunity to increase the utilization of mark-selective recreational fisheries to selectively harvest additional hatchery-reared lower Columbia River fall Chinook and Coho consistent with federal requirements under the ESA to improve the proportion of wild salmon reaching the spawning grounds. The continued failure of WDFW to make progress towards achieving the spawning escapement requirements established by the federal government for ESA-listed lower Columbia River "Tule" fall Chinook threatens additional reductions in hatchery production levels, which would have a significant impact on coastal salmon fisheries.

The proviso will also help better protect imperiled ESA-listed "B-run" steelhead, which are caught as bycatch in non-tribal mainstem fall Chinook gillnet fisheries. The WFWC ignored extensive public comment about the lack of science to support agency estimates of the level of steelhead mortality in current mainstem gillnet fisheries, let alone under the expanded mainstem gillnet fisheries approved by the WFWC. The fact is that after decades of use in the mainstem lower Columbia River, the states have never conducted the studies needed to quantify steelhead release mortality rates in non-tribal gillnets – despite requiring that these studies be conducted for alternative, selective fishing gears like pound nets and purse seines. WDFW's current steelhead mortality estimates are highly uncertain and are not based in science.

The budget proviso brings Washington into closer alignment with the Columbia River fishery rules of the State of Oregon. The policy adopted by the WFWC differs drastically from the State of Oregon's rules for allowable gears and allocations across all three fishing seasons – spring, summer, and fall. Under the WFWC policy non-tribal gillnets are permitted in the mainstem during all three seasons, while Oregon's rules have limited the use of traditional gillnets to one section of the river during the fall season. The WFWC policy also reduces selective recreational fisheries in favor of increased non-selective gillnetting, including allowing mainstem gillnetting before forecasted returns of ESA-listed spring Chinook can be confirmed with actual return counts.

The budget proviso would restore recent concurrent management during the spring and summer seasons. During the fall, the proviso would restore policy concurrency for restrictions on mainstem gillnetting. While it would create a difference in the allocation of fishery impacts during the fall, differences in allocation are easier to address than allowable fishing gears. This minor area of non-concurrence will encourage additional policy and legislative alignment between Oregon and Washington related to a gillnet buyback, the implementation of alternative, selective commercial fishing gears, and other critical conservation efforts.

Washington should lead in the implementation of the Columbia River fishery reforms. Ever since your first campaign for Governor you have expressed support for the bi-state Columbia River fishery reforms and transitioning non-tribal gillnets from the mainstem Columbia River in favor of more selective fishing practices. You further embraced this and other Commission reform policies in your October 28, 2015 letter to the WFWC.

Your salmon recovery office has also [sounded the alarm](#) about the lack of progress towards achieving salmon recovery, including classifying three stocks of Columbia River basin salmon and steelhead as “in crisis” and five stocks as “not keeping pace.” Your administration has also highlighted the importance of Columbia River salmon stocks to struggling Southern Resident Killer Whales. Under your leadership Washington state has enhanced its reputation as national and global leader in environmental conservation, including in the fight against climate change.

Unfortunately, in recent years the WFWC has systematically worked to undermine the reforms and concurrent management with Oregon. With your involvement we know Washington can lead on this important conservation issue once again.

The legislature supports an actual buyback program for Columbia River gillnetting, not WDFW’s proposed license reduction program to purchase inactive gillnet licenses. WDFW requested funding to purchase only *inactive* non-tribal Columbia River gillnet licenses with the intent of improving the economic viability of the remaining gillnet fleet into the future. The proposal, crafted in response to the desires of the gillnet fleet, was not tied to an overarching strategy to reduce mainstem gillnetting or transition to alternative, selective commercial fishing gears. In fact, it came as the agency was actively working to drastically increase mainstem gillnetting. The legislature rightly concluded that this would not be a wise use of taxpayer funds and rejected amendments to implement WDFW’s approach. The legislature’s buyback and proviso language clearly establish a rationale for the buyback consistent with the overarching Columbia River reforms and WDFW’s own admission about the need to transition to alternative, selective fishing gears for mainstem fisheries.

The budget proviso does not apply to tribal fisheries or affect treaty rights. It is important to note that the proviso does not affect tribal fisheries or treaty rights in the Columbia River, Puget Sound, or on the Coast, and can be implemented consistent with the requirements of the *US v. Oregon* 2018-2027 Management Agreement.

We appreciate this opportunity to comment and urge your support of the voluntary non-tribal gillnet buyback and Columbia River fishery reform proviso.

Sincerely,

Nello Picinich
Executive Director
Coastal Conservation Association Washington

George Harris
President
Northwest Marine Trade Association

Alexei Calambokidis
Washington Conservation Manager
Trout Unlimited

Greg Topf
Board Chair
Wild Steelhead Coalition

Liz Hamilton
Executive Director
Northwest Sportfishing Industry Association

Jessica L. Helsley
Washington Director
Wild Salmon Center

Brad Throssell
President
Washington Council of Trout Unlimited

Chris Hager
Executive Director
Association of Northwest Steelheaders

Pete Soverel, President
David Moskowitz, Executive Director
The Conservation Angler

Bob Rees
Executive Director
NW Guides and Anglers Association