



May 27, 2009

Washington Fish & Wildlife Commission

Dear Commissioners:

We would like to comment on WDFW Commission proposed policy C-3619 on Hatchery and Harvest Reform. Unfortunately, the public hearings have been scheduled for the months of June and July, when the vast majority of Washington State's commercial salmon fishermen are engaged in fishing either offshore or in Alaskan waters, and unavailable to comment in person.

A number of fishermen in the Columbia River commercial salmon gillnet fishery are involved currently in the development of selective fishing gear for the mainstem Columbia. The most promising gears at present are the seine, both purse and beach, and the tangle net with an auxiliary oxygen system for the recovery box. For the present, other options, such as the trap, reef net and fish wheel are considered much more problematic, and are on the low end of the priority list.

We would like to draw your attention to a number of issues and parameters regarding development of alternative harvest methods.

1. None of these gears, except the tangle net, were ever designed or used on a commercial scale on the Columbia River with the idea of returning fish to the water alive.
2. There have been dramatic changes in environmental and water conditions since these gear types were last used. For example, there has been an exponential proliferation of invasive aquatic plants, such as Eurasian milfoil, that tends to foul stationary gear even after brief periods of time.
3. There have been large increases in marine mammal predations and societal attitudes regarding them have changed in the seventy or more years since gears such as seines and traps were last used on the Columbia.
4. There is a need for selective harvest methods to be economically viable. Most of these gears are both labor and capital intensive. They will need to produce more fish than a gillnet, not only to fund increased equipment expenses but to support three or four families, as compared with a one person gillnet boat operation.
5. Continuing in the economic viability vein, these gears need to fish primarily in the mainstem where fish still have substantial market value, not in the tributaries, where quality often rapidly degrades.
6. Mobility: Both hatchery and natural salmon populations typically fluctuate substantially in terms of when and where their migration occurs while in the river. Technologies that are the most flexible in terms of time and area are the best fit in order to take advantage of harvesting opportunities. Gears such as traps and wheels, which are extremely site specific and not generally very mobile, are less reliable methods of ensuring that harvestable surpluses can be caught.

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In sum, we are looking for a policy that encourages creativity and experimentation, while using caution in order to ensure that unacceptable bycatch losses and other unacceptable costs and problems are avoided. There also needs to be a recognition that new gear will not materialize overnight, and that years of experimentation may be necessary.

In this regard funding is going to be crucial to dealing with some real challenges. The Colville Tribe is approaching its second season of a five-year testing phase with experimental gear. Lower Columbia fishermen are being paid to design, build and test the gear. We note that the mainstem Columbia below Bonneville Dam, with tidal influence, strong current, and a multiplicity of stocks and species is a far more complicated milieu for gear experimentation than the upper Columbia. Expecting fishermen to design viable alternative harvest technologies and deploy them on a commercial scale is not realistic in anything under ten years.

We would further comment that the notion that mark-selectivity is preferable to all alternatives ignores the limitations of live-capture technologies. For example, using a small-mesh tangle net during warm water conditions in summer will likely impact non-target listed species such as summer steelhead and sockeye, whereas using a large-mesh gillnet allows the non-target fish to simply swim through the gear, thus avoiding capture and handling entirely. In this case, utilizing the larger mesh size is superior to going mark-selective.

Finally, in the context of the HSRG recommendation of removing large numbers of more abundant hatchery fish before they become a habitat/spawning ground issue, we would suggest an additional policy statement:

“If there are substantial hatchery surpluses to be harvested and the commercial fishery develops selective harvest technologies that are equal to or lower than the prevailing rates in other fisheries, it will be a policy to reserve impact handling mortalities of non-target stocks for the commercial fishery commensurate with the level of fish to be harvested.”

This policy will also provide incentive for fishermen and local communities to build infrastructure and invest once again in resources they have depended upon for 150 years. In the rush to solve these scientific and technical problems, the livelihoods and communities of those most affected have largely been overlooked, as have the needs of the consumer market. Perhaps it would be well to pause and reflect that the large hatchery programs on the Columbia River and elsewhere came into being to mitigate for harvest opportunities lost by those communities due to the diversion of water and habitat that salmon needed, in order to serve other purposes. The past president of the Oregon Restaurant Association recently commented, “People don’t come to visit Oregon with the idea of eating a hazelnut or a pear, but they do expect to eat salmon.” We don’t need to import the Northwest icon from British Columbia or Alaska.

Respectfully,

Hobe Kytr, Administrator
Salmon For All

Cc: Rep. Brian Blake, Chair, House Agriculture and Natural Resources Committee
Sen. Kenneth Jacobsen, Chair, Senate Natural Resources, Ocean & Recreation Committee
Sen. Brian Hatfield
Rep. Dean Takko