



Colville Confederated Tribes Fish and Wildlife Department



Washington Department of Fish and Wildlife
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Sent by U.S. mail and email

Re: Colville Confederated Tribes' Comments on Sportfishing Rule Proposals for 2013-14

To Whom It May Concern:

The Fish and Wildlife Department of the Colville Confederated Tribes (CCT) submits these comments on the Sportfishing Rule Proposals for 2013-14 prepared by the Washington Department of Fish and Wildlife (WDFW). This letter specifically addresses Sportfishing Rule Proposals 15 and 9, both of which have the potential to impact CCT fisheries and CCT's fishing rights on the Columbia River and in particular on the portions of Lake Roosevelt within the Colville Reservation. CCT submits these comments as a federally recognized sovereign Indian tribe and a co-manager of the Lake Roosevelt fisheries.

The current rates of predation of wild fish populations by non-native fish in Lake Roosevelt and the Columbia River are unacceptable from a sustainable ecosystem perspective. A predation study on the Sanpoil River Arm of Lake Roosevelt indicates that walleye consume a substantial number of the hatchery kokanee and wild redband trout migrating out of the Sanpoil River into Lake Roosevelt—45% of kokanee fry, 25% of kokanee yearlings, 41% of redband trout yearlings, and 35% of redband trout juveniles (older than yearlings) (Stroud et al. 2010). Evidence also indicates that smallmouth bass consume substantial numbers of Sanpoil River salmonids. In addition, there is an ongoing international effort to address a persistent lack of wild juvenile recruitment by white sturgeon in Lake Roosevelt and the upper Columbia River. While many factors likely contribute to the recruitment failure, predation by non-native species is a concern. In 2001, when there was an expectation of some natural recruitment by white sturgeon due to higher-than-average flows, the only sub-yearling sturgeon that was observed (despite substantial monitoring efforts) was extracted from the gut of a walleye. Clearly, when flow and environmental conditions are favorable for production of sub-yearling sturgeon, walleye predation remains a significant problem.

This evidence indicates that current management of non-native fish species in Lake Roosevelt and the Columbia River is inadequate to protect wild fish populations, particularly redband rainbow trout, kokanee, and white sturgeon. CCT is evaluating revisions to its member and non-member fishing regulations to enhance protections for these wild fish population and to liberalize walleye and smallmouth bass fishing restrictions. CCT hopes that WDFW will take similar steps towards achieving a balance in the predator-prey relationship by adopting the regulatory options that provide the greatest protection for wild fish populations and the most effective management of non-native walleye and smallmouth bass.

I. Proposal 15—liberalize bag limits for walleye on Lake Roosevelt and the Spokane Arm of Lake Roosevelt.

WDFW's options for Proposal 15 are intended to address the overabundant population of walleye in Lake Roosevelt and their impacts to native salmonids. This overabundance has resulted from WDFW's current management approach, which includes an 8 fish bag with no more than one fish over 22 inches and a closure on the only known spawning grounds for walleye in Lake Roosevelt (the Spokane River) from April 1 to May 31 annually. As WDFW biologists have recognized, modeling indicates anglers need to harvest at least 150,000 walleye per year in Lake Roosevelt before population-level impacts would be realized. *See Attachment A (WDFW memo to Inland Fish Policy Advisory Group).* Current harvest, however, is approximately 50,000 walleye per year. Therefore, managers need to change the current regulations to achieve the harvest of an additional 100,000 fish. Four potential options are presented in the proposal, all of which include opening the Spokane Arm for walleye harvest during the walleye spawning season from April 1 through May 31:

1. 8 walleye limit, one over 22"
2. 16 walleye limit
3. 16 walleye limit, one over 22"
4. No regulation on daily limit or size for walleye

CCT does NOT SUPPORT Option 1 because it will not result in the necessary level of harvest to achieve the required reduction in walleye abundance. Although harvest levels would likely increase with the opening of the Spokane Arm in April and May, the estimated harvest would almost certainly fall short of the 150,000-fish target required to reduce overabundance, as indicated in WDFW's FAST modeling efforts.

CCT does NOT SUPPORT Option 2 although CCT considers this to be the second-best option of the four proposals. Modeling indicates that implementation of Option 2 would lead to only a doubling of the harvest from the current level of 50,000 to 100,000 in the reservoir, which is still well below the 150,000 target developed through WDFW modeling. The increase in harvest is a result of opening the spawning run rather than offering prolonged harvest opportunities throughout the year. Harvest rates vary seasonally with high levels during spawning (April-May) and the summer (June-August), and lower levels the remainder of the

year. The 16 fish limit reduces anglers' ability to maximize harvest during key months. Predation studies in the Sanpoil River indicated that the medium sized walleye (10-18 inch range) have the greatest cumulative consumption impacts on the kokanee and redband trout populations. This size class is abundant during the spawning run, with anglers reporting catches of more than 50 walleye per day just prior to and following current spawning run closures. A limit of 16 fish during the spawning run will not allow anglers the opportunity to harvest these overabundant, medium-sized fish, reducing managers' ability to use harvest as a management tool.

CCT does NOT SUPPORT Option 3. The FAST model predicted a two-fold increase in harvest; however, the model did not include the 22 inch slot limit. Therefore, we suspect that the predicted level of harvest would be less than that predicted for Option 2, which itself was not predicted to reach the target of 150,000 walleye harvested per year. The net effect of a doubling the level of harvest results solely from increased angling opportunities during the spawning run. Current length data from harvest monitoring and annual Fall Walleye Index Netting (FWIN) indicate that the abundance of walleye greater than 22 inches is relatively low; with 1.9% of the harvest and 5% of FWIN catch (2011 data in lower reservoir) comprised of walleye more than 22 inches long. The low abundance of large fish is likely the result of the high density of walleye, which has limited their growth. Restricting the opportunity to harvest large walleye during the spawning run lowers the chance of reducing the abundance of walleye to meet population goals by unnecessarily protecting large females. Walleye have high fecundity and, at the abundance level suggested by WDFW, can be supported by even fewer mature females.

CCT SUPPORTS Option 4 and calls for WDFW to select this option because it is the only one likely to achieve the WDFW-modeled harvest target for Lake Roosevelt walleye. Option 4, which adopts no daily limit or length restriction for walleye, provides the greatest opportunity to reduce the overabundant walleye population in Lake Roosevelt and protect native species of concern. This option allows for maximum angler harvest of walleye of all sizes during localized, seasonal intensive fisheries, such as the spawning run in the Spokane Arm. Removing these restrictions on walleye harvest is likely the only way – among the four rule options – that harvest management will be successful in conserving native fishes and bringing the predator-prey balance back to a sustainable level.

Lake Roosevelt is a man-made reservoir that has drastically altered the ecosystem. The flow and temperature conditions in the Spokane Arm make for ideal spawning conditions for walleye. Managers are aware of the fact that regardless of walleye regulations in Lake Roosevelt, walleye will always be a part of the fish community, *i.e.*, it is biologically impossible to eliminate this species. However, the management of walleye has been too conservative for too many years. CCT supports aggressive management that will quickly reduce the abundance of walleye, because such management is necessary to protect wild fish populations. CCT, with support from the Spokane Tribe and WDFW, implement numerous monitoring efforts (FWIN, creel, etc) that enable the group to monitor changes in fish population structure. Because this cooperative effort has resulted in bench marks, goals for harvest, and plans for the monitoring of changes, CCT

feels confident in its ability to recommend and implement adaptive management measures should the changes in walleye populations diverge from the model estimates.

II. Proposal 9—remove or modify size and daily limits for bass, walleye and channel catfish in the Columbia River, Snake River and their tributaries.

Proposal 9 seeks to increase harvest on bass, walleye, and channel catfish in the Columbia and Snake rivers to reduce competition and predation on ESA-listed anadromous salmonids. CCT supports either option presented in the proposal; however CCT suggests the range be extended to include Lake Rufus Woods (the reservoir above Chief Joseph Dam). This would result in aggressive management of predator fish in areas of the Columbia River system outside of Lake Roosevelt similar to the management approach for Lake Roosevelt that CCT recommends for Proposal 15.

While CCT supports the modified Proposal 9 suggested above, CCT believes that Proposal 9 will only be effective if it is adopted in conjunction with CCT's recommendation for Proposal 15 discussed above. This is necessary to reduce competition with and predation on salmonids downstream of Grand Coulee Dam. Currently, walleye and bass populations found in Lake Roosevelt are unsustainably high because of years of conservative harvest regulations (see discussion above), and these non-native predator populations seed downstream waters. Accordingly, if Proposal 9 is implemented without adoption of an aggressive approach for management of walleye in Lake Roosevelt, any gains realized will likely be minimal due to the continual recruitment from overabundant predator populations in Lake Roosevelt. Additionally, while this proposal focuses on protection of ESA-listed species only, WDFW should not disregard conservation of important resident native fishes including redband trout, kokanee, and white sturgeon.

CCT supports Proposal 9 with modifications: Proposal 9 should be modified to include Lake Rufus Woods, and should be adopted in conjunction with Proposal 15 (Option 4).

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CCT appreciates the opportunity to comment on the WDFW Sportfishing Rule Proposals for 2013-14. Please contact Bret Nine, CCT Resident Fish Program Manager, at 509-209-2419, if you have any questions regarding this letter or would like to discuss the issues in more detail.

Sincerely,


Randall Friedlander
Director, CCT Fish & Wildlife

12-19-12
Date