

11 January 2014

Summary of public comment regarding draft Grays Harbor Salmon Management Policy.

Included below are excerpts from written comment received between October 21, 2013 and January 9, 2014, and verbal testimony summarized from the December 7, 2013 Fish and Wildlife Commission meeting. Comments have not been edited for content or to correct spelling, grammar, or punctuation.

Comments were summarized into ten (10) categories including: allocation, alternative fishing practices, communication/transparency, conservation, data rigor, economic value, enforcement/accountability, hatcheries, limit effort, and miscellaneous.

Categories are collated by major reason for which the policy is needed (Enhance Conservation Focus, Restore and Maintain Public Trust, and Clarify Sharing of Impacts), followed by a section with remaining categories.

Enhance Conservation Focus

Conservation

- The state wants to kill down to the last fish. We need to think about conservation.
- Calculated in FRAM down to the last fish the bycatch to the last fish.
- complete closures have been implemented before and the fish come back. It that is what it takes fine. It comes down to conservation. We need the fish in the gravel.
- ESCAPEMENT GOALS and SALMON CONSERVATION must be the #1 Priority. Once the resource is gone, everyone loses.
- Escapement ,We must meet escapement goals each and every year. This is imperative to the survival of the fish that swim and spawn in these waters. Any type or length of fishery should always be secondary. I am well aware that this could mean on lean years that we do not have a directed fishery by anyone and if that is what it takes then so be it.
- It was abundantly clear from the vast majority of attendees that consevation of Grays Harbor wild salmon is their highest priority. Several topics were included within the conservation umbrella; opposition to the Chehalis River dam, ocean-derived nutrition, harvest management and more.
- The state is driving to ESA.
- As for Conservation, everyone needs to do their part.
- My big thing is in-season management. I think conservation needs to be the top priority, even if it limits my opportunity to fish ensuring that over-forecasting doesn't have to result in overharvest, and subsequently missed escapements.
- This fishery must have season checks and balances to ensure that we do not over harvest on any given year
- Guiding Principles Item 14; When a mark-selective fishery occurs, the mark-selective fishery shall be implemented, monitored, and enforced in a manner designed to achieve the anticipated conservation benefits. Everytime the WDFW feels that the selective harvest is expected to impact fishery escapements goals, the fishery is shut down, but it's only shut down to sport fisherman and not tribal/commerical havesting. Escapement goals are not being met, yet we allow the tribal fisheries to run nets 7+ days a week which has a much greater impact on returning salmon than any sportsman catch.

- At the heart of the current difficulties is not just rec v commercial but rather the inland communities citizens growing and adamant opposition to the failure to make escapement and the practice of WDF&W awarding the vast majority of harvest taking place in the marine area communities of Aberdeen and Hoquiam.
- concerned about failure of Reg 6 management. Not making escapement.
- Continuing to fail for the last 10 years.
- Escapement goals are not being met.
- for too many years too many fishermen taking too many fish.
- Blatant overharvest by the QIN, particularly Chinook. Late coho and steelhead are in a similar state as Chinook.
- Millions of dollars have been spent by tax payers and Logging companies to create more habitat yet WDFW has not increased any Escapement Goals, provided more fish to the gravel, increased wild populations, to match the third largest watershed on the Pacific Coast on the United States. I see some great opportunities to increase fish populations in this wild river system that is capable of providing a better future of this resource.
- The people of our state have invested a lot in enhancing habitat for salmon yet Region 6 has been content to leave goals low and then seldom meet them. In a region which has been satisfied and enjoyed management job security while missing escapement goals for Gray's Harbor and Willapa Bay 9/10 of the time, a culture change would be needed.
- 30 years of experience in the legislative projects. I have worked on habitat recovery and still no fish in Wildcat Creek.
- Unfortunately, too little time was provided for indepth discussion regarding policies to achieve wild salmon recovery in Grays Harbor and its tributaries - far too much time was again consumed for allocation discussions
- If you are concentrating on the escapement maybe you should start in the ocean fishery. You don't want to admit to the amount of fish you are allowing to be killed in the "catch ten and release to keep one fishery".
- Article about Alaska Kenai Salmon - "Catch and release practices prevent many salmon from reaching a spawning location or result in poor spawning success."
- For the recreational fishery in Grays Harbor I would like you to consider the following: Any year there are not enough chinook to have a retention fishery that area 2.2 from the Chehalis River bridge (highway 101) to the mouth of Johns River (piling number 8) be closed to all fishing before the first of October. This is needed to save chinook salmon from over harvest via hook and release. Large numbers of fishers show up to see how many chinook they can catch in one day even though they release them. One fisher bragged to me they caught 17 chinooks in one day when it was non retention only.
- The spring chinook fishery is a joke. The only reason the tribe fishes for spring chinook is to harvest wild steelhead that are returning. This practice need to STOP!
- If CTRC is the non-treaty tribes then this draft does not allow a non-treaty spring Chinook fishery in the Chehalis River system. I support no non-treaty tribal fishing for spring Chinook in Grays Harbor and the Chehalis river system.
- Another issue I have is why is ANY spring salmon fishery of any kind allowed on the Chehalis River system?

Limit effort

- I would like to state for the record that I believe that until you curtail the tribal fishery it will be of little use to keep restricting the non tribal fishers.
- One partial solution is to LIMIT GUIDES AND CHARTER OPERATORS TO A SINGLE TRIP PER DAY. It would probably be prudent to have logbooks for guides to get a more accurate reporting of the true catches for salmon, sturgeon, steelhead and walleye.
- A quicker and more effective option would be to use a "drawing" similar to elk harvesting wherein a preset number of license holders will be granted the ability to fish in the upcoming season. While the number of fishers active each season would decrease, establishing a drawing avoids seasons where all the participants suffer when sales of fish caught "...didn't cover the cost of the diesel".
- for too many years too many fishermen taking too many fish.

Alternative fishing practices

- We must require sustainable forms of fishing. Currently Recreational fisherman utilize barbless hooks and selective or non-selective fishing as a means of ensuring the right fish are taken at the right times. Entanglement nets are not a sustainable fishing method.
- Make everyone even that's commercial fishermen go back to hook and line
- Following the example set in harvesting razor clams, crab, and shrimp, we propose that WDFW consider establishing commercial seasons wherein recreational and commercial license holders harvest with the same gear (poles), in the same geographical areas and at the same time throughout the entire season. License fees and bag limits could be adjusted as well. One example would be a commercial license at three times the recreational license and the commercial bag limit at three times the recreational in a corresponding fashion.

Restore and Maintain Public Trust

Communication/ Transparency

- The Grays Hbr. Advisory Committee, WDFW Fish biologists, and GH gill net assoc. should be on record as to their method, data and tools used to recommend the catch sharing percentages for each sector outlined in this "draft". I would like to see fishery decisions in Washington State made on biologically sound information. It appears that political influence now dictates many decisions made by WDFW.
- The public needs to be informed that the catch allowed by the non-treaty Chehalis Tribe(s) comes out of the recreational sector. If the category designated as CTCR in the charts is the non- treaty Chehalis Tribe(s), it needs to be designated as such in the draft policy. Non-treaty catch quota should not be taken from the recreational sector. How can WDFW give the non-treaty Chehalis Tribe(s) a catch percentage when they provide no catch figures to WDFW? My recommendation is "no catch figures", "no fishing".
- The Director and the Region need to bring co-management back to Grays Harbor.
- We need to talk about the QIN. They overharvest year after year. Then tell the state what they are going to do without any say from the state. WDFW needs to take them to court.
- There is no co-management in Grays Harbor. If the state is not fishing then the tribe will.
- WDFW needs to include previous run estimates, escapement goals and final catch statistics for each sector to determine an equitable catch percentage. The percentages "proposed in the draft" , for each sector have no meaning without inclusion of above mentioned data from previous years. The percentages outlined in the draft are meaningless w/o previous data.
- Overall the GH management plan is too vague and unclear. It is good to see a commitment for an annual review but there is little mention of metrics against which performance would be measured by the commission. This is a region that has regularly underperformed on escapement goals for multiple species for over a decade.
- The current draft does not have specificity. What we are looking for in the policy are deadlines and goals.
- These guidelines are only a tweaking of the current guidelines. In Willapa there are no co-managers – even with no co-managers the results are the same. Guiding principles, communicate, document, etc. these are not principals they are window dressing.
- I offered comment, those are not in the policy; asked for teeth in the policy they are not there either.
- Comments about communication – with the internet, communication is easy. With short notice through the internet look at all the people who are here.
- Thirdly, All participants in this fishery must meet their obligations to be involved in the process of season setting and ensure that their numbers and dates are published in the proper manner.
- I want to see the Public more involved in the WAC process before North of Falcon. This process has only involved a few people invited by WDFW. The Commercial Fleet has dominated this process for many years with WDFW supporting them over Conservation. The Tribes are also part of the Commercial harvest and should be regulated in the same process instead of WDFW letting them do what they want.

- The APA process is not being followed. I have spent \$10K's of my money bringing lawsuits against WDFW, and have 1000's of hours of time invested. The public trust is lost. Kehoe, you said for us to write the document, we did that. None of that is in this document. Don't close the door or your mind on this.
- far too much time was again consumed for allocation discussions... it amounts to nothing more than a wishing session between the gillnetters and the sporties.

Data Rigor

- The tools the department has is like a butter knife. The first improvement needed is the CRC. Like to see timelier reporting like in the PS crab CRC. Adaptive management, like in PS, monitor the fishery more closely and shut the fishery down when the quota is reached. Need a policy that passes fish to the spawning beds. There is no co-management in Grays Harbor. If the state is not fishing then the tribe will.
- Region 6, forecasts runs before fish hit the hatchery; need to let the fish hit the hatchery then forecast. I fish the Skookumchuck and have seen the enhancements.
- needs to be a framework for in-season management, ensuring that over-forecasting doesn't have to result in overharvest, and subsequently missed escapements.
- Science and biology should drive management.
- Calculated in FRAM down to the last fish the bycatch to the last fish. Then set the season in days. The mortality percentages - 45% is not in the Columbia studies. The study is only long-term, where is the short term? Other studies should be reviewed.
- The current Management plan and models for the Chehalis Basin and Willapa Basin are not acceptable anymore and out dated. Millions of dollars have been spent by tax payers and Logging companies to create more habitat yet WDFW has not increased any Escapement Goals, provided more fish to the gravel, increased wild populations, to match the third largest watershed on the Pacific Coast on the United States.

Enforcement /accountability

- The sports fisherman are getting more and more of the allocation every season. The sports fishers are not being held accountable for their catches as we the commercial fisheries are being held accountable for every fish harvested.
- Anglers on guide trips would also furnish license numbers to the guide to record days fished and actual catches to avoid cheating on the annual limits. Daily recording in the logbook should be mandatory and all entries should be made within 24 hours of the trip completion. Alaska uses this system but when boat launch areas are super busy then it is easy to forget to complete the log on site and a 24 hour allowance for recording final catch info would be fair. AK imposed fines for non completion on site and that was strictly a revenue operation and lead to many confrontations between guides and enforcement personnel.
- Selective fishing if its going to happen it needs to follow scientifically designed procedures and protocols. In Grays Harbor they violate all internationally recognized rules.
- They need to fish selectively like they have been trained.
- It was also made clear that there is considerable support for increasing the number of WDFW enforcement officers in order to maximise conservation efforts to recover Grays Harbor wild salmon
- there is considerable support for increasing the number of WDFW enforcement officers in order to maximise conservation efforts to recover Grays Harbor wild salmon.
- The public needs to be informed that the catch allowed by the non-treaty Chehalis Tribe(s) comes out of the recreational sector. If the category designated as CTCR in the charts is the non- treaty Chehalis Tribe(s), it needs to be designated as such in the draft policy. Non-treaty catch quota should not be taken from the recreational sector. How can WDFW give the non-treaty Chehalis Tribe(s) a catch percentage when they provide no catch figures to WDFW? My recommendation is "no catch figures", "no fishing".
- We need to monitor the Quinalt's and take them to court.

Clarify Sharing of Impacts

Allocation

- 77,000 people sport fish salmon in the state of Washington (1.1%); the commercial fishers provide fish to the rest of the state. Allocation should be 50:50 on all species.
- In the survey the sports zeroed out commercial allocation. Sport have lots of opportunity statewide.
- I fully support the non-treaty commercial salmon fishing in Grays Harbor. Generations of families in Grays Harbor have been supported by the salmon gillnetting season - I strongly encourage you to consider those families - it's very important to them.
- I have been a gillnetter for over forty years. In the 70s we would get to fish from the 6th of July till sometime in November. The fleet of boats was over four times what it is today. We had a very valuable sport fishery during those times also.
- I support the non-tribal commercial salmon fishery in Grays Harbor. The non-tribal commercial salmon fishery is vital to many families in our area. Please keep this in mind when determining future allotment of our resources.
- There are other fisheries in GH, we need to be mindful of the share that comes to the state. That is the portion that should be fairly distributed to sport and commercial fisheries. The sports emphasize that there are two fisheries; sport and commercial - and that commercial include the tribes.
- The sports fisherman are getting more and more of the allocation every season. The sports fishers are not being held accountable for their catches as we the commercial fisheries are being held accountable for every fish harvested. Washington gives the tribal fishers 58% of the allocation. Start there. The commercial catch is nominal compared to the tribal and the sports fishers
- The Chehalis side should have a small amount of Chinook set aside for the commercial to access to coho. There are large surplus of coho – hatchery and natural both.
- Divide the catches of Chinook equally between the recreationals and gillnetters for wild chinook. Since wild coho has been the run of concern for the last several years they will be used as incidentals during chinook and chum fisheries. Impacts to be used when run size is below escapement goal will be divided 60% gillnetters and 40% recreationals. The only exception to this is if the run size is 156% greater than the escapement goal then there could be a directed wild coho fishery divided 60% recreationals and 40% gillnetters. Between 110% and 156% of escapement goal the wild coho will be divided 60% recreational and 40% gillnetters. Hatchery chinook and hatchery coho will be taken during other Humptulips fisheries.
- The goals for recreational fishing involving "experience" or "opportunity" are inappropriate. We are already seeing this concept being abused in plans for alternative gear elsewhere in the Columbia. OR officials are talking about closing sport fishing during peaks of runs to allow enough mark selective commercial harvest using purse seines! Sports not to worry, you will get extra days during off peak run times. Seines get the harvest, sports get the "experience" of more fishing with less opportunity per day. This is how sports fishing is to be minimized, along with its superior economic benefits. The draft guidelines need to be changed to prevent this approach in Region 6.
- They should not be fishing more than 3 days / week. They are taking huge sections out of the run.
- the commercial gill nets should be in the water one day less than what it was this year. I've been keeping an eye on the nets in the river because I drive over the Chehalis river bridge in Aberdeen every day and have seen nets in the river, either commercial or native american, 5 days a week. That is unacceptable for recreational fishing because when they take the nets out on Friday, it takes a while for those fish can get through to get up the river to where bank fisherman can have some fun and try and catch some salmon to allay the exorbitant cost for the license. I have no problem paying the license cost but expect the recreational fishery to be given more emphasis.
- One good thing is to allow 3 d/wk without nets. Need a change in the current conscious approach. End of year review – compared to what? Need more in the policy.
- Support 3 days/week proposal for net free.

- The 3 day proposal for net free; what does that mean? The treaty fishery is already fishing 4 days/week, does this leave the NT fleet sitting on the beach?
- The rec option offered 3 days sport and 4 days commercial. The Commercial won't offer a compromise. Recreation is willing to have days on and days off.
- Tribal and commercial netting should only be allowed on a Sun (1200) - Thursday (1200) during the fishery. If the catch goals are not met, extensions or additional netting days can be addressed and granted, but only after escapement data is reviewed.
- I want to see the Public more involved in the WAC process before North of Falcon. This process has only involved a few people invited by WDFW. The Commercial Fleet has dominated this process for many years with WDFW supporting them over Conservation. The Tribes are also part of the Commercial harvest and should be regulated in the same process instead of WDFW letting them do what they want.
- Similarly, it was very clear that future, non-treaty salmon harvests should be guided by the greatest benefit to cost ratio - from the data shared this evening it seems that recreational fishing accounts for far greater revenue to Washington state than does the commercial sector.
- At the heart of the current difficulties is not just rec v commercial but rather the inland communities citizens growing and adamant opposition to the failure to make escapement and the practice of WDF&W awarding the vast majority of harvest taking place in the marine area communities of Aberdeen and Hoquiam.
- The QIN fishery represents more than a meaningful commercial opportunity, and it should be the only one they are obligated to allow. I would like to state for the record that I believe that until you curtail the tribal fishery it will be of little use to keep restricting the non tribal fishers.
- Commercial netting should be stopped immediately within Grays Harbor and its tributaries. This is an outdated practice that is not sustainable today in this location due to overharvest and impacts on sensitive species as it does not allow of selective release listed groups of fish. Additionally there is not the abundance of fish in Grays Harbor that allow this practice to continue. The economic benefit of having a strong sport fishery in Grays harbor and its tributaries far out weigh the small benefit that harvesting the remaining fish by commercial fisherman
- The public has repeatedly stated that a tribal net or a non-tribal net is a commercial net under state law. The legislative mandate of the Commission and department states, "The department shall promote orderly fisheries and shall enhance and improve recreational and commercial fishing in this state." (RCW 77.04.012). You will notice the law does not require the Department to provide three commercial fishing opportunities based on tribal affiliation. The attached AGO shows the Attorney General was asked if a non-tribal commercial fisherman who opted to take the buyout could sell the boat back to a tribal fisherman. The AG opined that a tribal fisherman was a commercial fisherman under state law and such could not be done. Since the Chehalis and the Quinault commercial fishing takes approximately 58% of the available harvest in Grays Harbor, the mandate is fulfilled without the Department imposing yet another third commercial fishery.
- The inland community does not perceive a difference between the commercials. This ain't Mobile Alabama 1963 the state needs to get over it, the tribes have the right to take their fish.
- Steady decline in the Chehalis. You see that there are two different gillnets, this is one fishery. We are fishing behind all these nets. There should be a focus on one netting season – 60:40 commercial.
- Two fishing interests – rec and commercial. Both interests desire the maximum allotted to them. The commercials scoop hundreds, the recs use one hook, and can only keep two.
- Economics we important, look at where the money comes from; you are supporting a welfare system for the GH commercial fleet.
- Allocation should be developed on science not public opinion. It needs to be understood that nets are not in the water 24hrs / day, the fish get through. Sound fishery science.

Other

Economic value

- Commercial value does not account for 1000's of coho that go un-harvested.
- Increasing the sales price of the fish harvested commercially would provide compensation for the reduced harvest volume. WDFW should consider eliminating the would allow the commercial license holders the ability to market the fish caught at retail (i.e.commercially in its seasons in Grays Harbor be sold at wholesale to a licensed fish buyer. This requirement that fish caught "Fresh Tuna" on the dock in Westport, fresh salmon at the farmer's market in Olympia, etc.).
- I'm a sportfishing guide based out of Olympia. I spend the majority of my days fishing in the Chehalis Basin. A dependable season would make my job much easier. I can book trips without fear of in season shutdowns.
- I look at things in terms of money. Are you getting your numbers up? That is an investment. If we are not getting fish back then why are we spending the money?
- The economic benefit of having a strong sport fishery in Grays harbor and its tributaries far out weigh the small benefit that harvesting the remaining fish by commercial fisherman.
- Also, the economic impacts do help the local economy in a big way My clients, for a two person trip pay me around \$175 a person for a days fishing. Many people come from out of the area, spending money on motels, dinner, lunch and assorted other items plus licensing. This benefits many in the local area. I also try and buy my supplies locally as well as fuel and my licensing. Thanks for taking this into account when looking at fishings impacts to the local economy.
- recreational fishery has more economic value than the commercial fishery (at least that is what your data suggests even though you say that it is not comparable to commercial data), that the commercial gill nets should be in the water one day less than what it was this year.
- it was very clear that future, non-treaty salmon harvests should be guided by the greatest benefit to cost ratio - from the data shared this evening it seems that recreational fishing accounts for far greater revenue to Washington state than does the commercial sector
- Economics we important, look at where the money comes from; you are supporting a welfare system for the GH commercial fleet.
- I am writing to express my interest in the Grays Harbor non treaty gillnet fishery. South Bend Products purchases a large percentage of the harvested fish from Grays Harbor. The fishery produces high quality fish that are marketed throughout the country. Please consider the fact that in addition the income the fishery provides to the fisherman, it provides jobs to on- site buyers and crew, truck drivers, plant workers and office staff. Reduction or elimination of the non-treaty fishery is a reduction of jobs in Gray's Harbor and Pacific Counties. I would appreciate your consideration of maintaining the non treaty fishing opportunities in Gray's Harbor.
- The GN licenses actively used are about 50% of those sold. You could cut that by 50% again and you might have viable fishery.
- late 1970-80's commercial buyback. The commission mandate in state law is to maintain the viability of the fishing industry.
- sport fishery \$1.5M, in current dollars is close to \$2M.

Hatcheries

- We also need to restore the hatchery production that has been lost.
- Also you have to fertilize the River you have to put the salmon carcasses back in the River to fertilize the River, most of the rivers are stale and dead now because they have not had the salmon carcasses that the bugs need to feed on. Let's revive the rivers. Then also put as many fish in the River as possible. Then it would make no difference whether it was a hatchery fish are wild spawned fish it would be in the River and you'd have as many fish as you need.

- As for the hatchery's put the hatchery's at full speed raise as many fish as possible get them in the River, it doesn't have to be a year later after they have attached, put them in immediately.
- enhancing the Salmon returning to Grays Harbor. I only see maintaining what we have now.

Miscellaneous

- Neither current escapement goal methodology nor eelgrass management practices by WDFW take into account the natural carrying capacity of these bays
- Region 6 has been content to leave goals low and then seldom meet them. In a region which has been satisfied and enjoyed management job security while missing escapement goals for Gray's Harbor and Willapa Bay 9/10 of the time, a culture change would be needed.