



## PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE

Print Form

In accordance with [RCW 34.05.330](#), the Office of Financial Management (OFM) created this form for individuals or groups who wish to petition a state agency or institution of higher education to adopt, amend, or repeal an administrative rule. You may use this form to submit your request. You also may contact agencies using other formats, such as a letter or email.

The agency or institution will give full consideration to your petition and will respond to you within 60 days of receiving your petition. For more information on the rule petition process, see Chapter 82-05 of the Washington Administrative Code (WAC) at <http://apps.leg.wa.gov/wac/default.aspx?cite=82-05>.

### CONTACT INFORMATION *(please type or print)*

Petitioner's Name Tom Moonan  
Name of Organization Grays Harbor Sportfishing Coalition  
Mailing Address 58 Stillson Road  
City McCleary State WA Zip Code \_\_\_\_\_  
Telephone 253 312 7460 Email anwguideservice@gmail.com

### COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClst.htm>.

### INFORMATION ON RULE PETITION

Agency responsible for adopting or administering the rule: \_\_\_\_\_

**1. NEW RULE - I am requesting the agency to adopt a new rule.**

The subject (or purpose) of this rule is: \_\_\_\_\_

The rule is needed because: \_\_\_\_\_

The new rule would affect the following people or groups: \_\_\_\_\_

**2. AMEND RULE - I am requesting the agency to change an existing rule.**

List rule number (WAC), if known: WAC Title 220 Coastal River and Stream Fishing Regulations WAC 220-312-020

- I am requesting the following change: Change Humptulips River Fishing regulations above 101 bridge back to no bait restriction from March 1-March 31 or end of season each year as it was prior to general rule change and simplification process.
- This change is needed because: Protection of wild steelhead stocks during spawning times. This is a shared perspective of the steelheading community, a very diverse group of anglers, who are sometimes are at odds, to take a more conservative approach to protect Humptulips Wild Steelhead.
- The effect of this rule change will be: It will align a majority of the steelheading guides, businesses, and organizations in this watershed in a manner that provides consistent goals for both opportunity and conservation protections for the future.
- The rule is not clearly or simply stated: Rule must ensure "No bait allowed March 1-March 31 each year.

**3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.**

List rule number (WAC), if known: \_\_\_\_\_

*(Check one or more boxes)*

- It does not do what it was intended to do.
- It is no longer needed because: \_\_\_\_\_
- It imposes unreasonable costs: \_\_\_\_\_
- The agency has no authority to make this rule: \_\_\_\_\_
- It is applied differently to public and private parties: \_\_\_\_\_
- It conflicts with another federal, state, or local law or rule. List conflicting law or rule, if known: \_\_\_\_\_
- It duplicates another federal, state or local law or rule. List duplicate law or rule, if known: \_\_\_\_\_
- Other (please explain): \_\_\_\_\_

Washington Department of Fish & Wildlife Commission  
PO Box 43200  
Olympia, WA 98504-3200

December 10, 2018

Dear Washington Department of Fish & Wildlife Commissioners,

On behalf of the thousands of steelhead anglers represented by the businesses and organizations signing on below, we are writing to respectfully request that the Commission reinstate Selective Gear Rules on the section of the Humptulips River from the Highway 101 Bridge upstream to Donkey Creek.

It is the shared perspective of those represented that there is a unique opportunity with this very diverse group of steelhead anglers, who are sometimes at odds on fish management issues, to take a more conservative approach to managing the Humptulips River steelhead fishery and thus provide a social benefit to the Washington anglers, guides, and local communities as well as a forward-thinking conservation approach for this population of wild steelhead.

For years, the WDFW fishing regulations mandated Selective Gear Rules on the aforementioned section of the Humptulips River from March 1 – March 31, which helped to reduce wild steelhead catch and release mortality and provide sustainable angling opportunities. However, this restriction dropped last year as the result of an effort by the Department to simplify sportfishing rules.

According to the state's records, over the course of the last thirty years the Humptulips has only made escapement approximately 60 percent of the time, which is far from acceptable in the opinion of our groups. Therefore, as a means to be forward thinking in both conservation and from a social perspective we believe the restrictions that were in place and removed, should be re-instated. This will support a common vision and ensure an enhanced level of protection in this portion of the watershed just as others along the coast.

The implications of changing this rule back to what it was will ensure that fishing methods and gear that may have a detrimental impact on wild steelhead are not used at times when these fish are preparing to spawn. While we are aware that this rule change will not solely fully protect and help recover the Humptulips River wild steelhead population, it is one way to relieve pressure on spawning fish and provide an enhanced level of protection.

We are optimistic that WDFW will support the re-instatement of this much needed regulation for the upper Humptulips watershed. WDFW and the Commission have the ability to socially improve the support for steelhead fishing among this diverse group of anglers and at the same time rectify this situation and manage the Humptulips more conservatively for the future. Therefore, we strongly encourage the Commission to act swiftly and reinstate Selective Gear Rules on this stretch of the Humptulips River.

Thank you for your consideration.

Sincerely,

Tom Moonan  
President  
Grays Harbor Sportfishing Coalition

Jonathan Stumpf  
Board Chair  
Wild Steelhead Coalition

Robert Kratzer  
President  
Northwest Olympic Peninsula Sportfishing Coalition

Bill Meyer  
President  
Olympic Peninsula Guide Association

Doug Saint-Denis  
President  
Northwest Guides & Anglers Association - Washington Chapter