



January 7, 2018
Fish & Wildlife Commission
600 Capital Way North
Olympia, WA 98501

Re: Puget Sound Chinook Harvest Management Plan-a 10 year self-manufactured-disaster.

Dear Commissioners,

I am writing you about the controversial Puget Sound Chinook Harvest Management Plan. This plan was not well thought out and you were excluded from the process. This plan is a *needless self-made-disaster* due to WDFW not fully doing their homework and signed by the Director. This appears to be making steps towards conservation, when in fact it does nothing for conservation on the Stillaguamish river, the main driver. I am attaching a fact sheet to explain why. Instead it will cause severe hardships for its constituents and Washington State businesses. It is going to bankrupt many of them (it has already started the domino effect). It does not fix the real problem driver that sinks the ship, the Stillaguamish River. I am attaching a Dec. 28 letter from Master Marine of cancelation of new boat building orders. Charters are calling me and bailing out trying to sell their boats and charter licenses. This was weeks ago so I am sure tis getting worse. We have solutions that can work and are glad to share with you. This plan was finalized and signed at a time when, Ron Warren the Fish Program Manager and Director Jim Unsworth were both out of the country, to meet the deadline. The two top fishery department leads were not there in person to inspect and finish the plan. Had Ron Warren been there, I guarantee this would not have happened. We believe only 1-2 staff members are in favor of the Stilly portion and the rest of staff is not. The Stillaguamish has very small amount of habitat for wild fish to spawn. Sediment is a major problem in this river. Stopping all fishing will not recover the Stilly Chinook. The PSCHMP states this in it! The general public understand this and is outraged that this has gone this far. Conspiracy theories are being pondered because common sense is being ruled out. The Commission needs to stand against this and right the wrong. North of Falcon 2018 is coming fast. This management plan cannot be used as a framework for this year's NOF 2018. The plan has got to be sent back to the drawing board for alteration or be rescinded altogether. This plan is a disaster in the making for Washington state. Some of the tribes are not on board with it either. The tribes did not cause this. It's a WDFW problem.

The new Puget Sound Chinook Harvest Management Plan will close or severely restrict saltwater salmon fishing from La Push to Tacoma, including the San Juans, and Strait of Juan de Fuca. Also will devastate Washington State boat manufacturing, its sales, tackle manufacturers, tackle retailers, marinas, and coastal communities. Not to mention unjustly remove available fisheries from WDFW's own constituents. Closed fisheries will not fund WDFW and it is cutting its own throat. Below are the reasons that this plan has to be altered or back out of the deal. It might be uncomfortable but is the right thing to do. We have been holding back the floodgates of the general fishing public until we got to the bottom of this.

Expectations from WDFW on the 338 page Puget Sound Chinook Harvest Management Plan were very disappointing. They did not model all of the plans to be able to project the future before signing off. WDFW did not work on behalf of its stakeholders/constituents concerns as the lead negotiator. We constituent's license fees pay to keep WDFW funded. In return, we have expectations from our partners to negotiate in good faith for us. It's a partnership.



Stillaguamish River Chinook Component is the constraining stock of the entire plan and this is what we are talking about.

1. Were Stillaguamish Conservation goals met, and what is wrong with the Stillaguamish River?

A. NO, this is not a fishing problem but strictly a habitat problem. Stated in the plan itself. By cutting fishing for the last 30 years, in this area, has not fixed this habitat. Page 167 from the PS Chinook RMP states, "**Due to the limited productivity of existing habitat, it is unlikely that fishery actions alone can rebuild abundance of Stillaguamish Chinook to higher levels.**"

B. The available spawning habitat on the Stillaguamish River can only hold approximately 930 spawners. The wild fish in this river system are battling to survive due to very little available spawning habitat.

C. **Oso mudslide in Stilly is only a smaller part of the sediment problem. USGS study: "Based on this estimate, landslide material accounted for about 30 percent of the total suspended sediment load in the lower Stillaguamish River between March 2014 and September 2015."** Page 44- Geomorphic Response of the North Fork Stillaguamish River to the State Route 30 landslide near Oso, Washington," a 2017 report. "**Only 30% is from the mudslide!** The Stilly is in very bad shape! Sediment is a major problem.

2. WDFW is supposed to enhance fisheries for its constituents when available. This plan does the exact opposite. It crushes our fishing, economy, boat and tackle manufacturers, Charter businesses, retailers, hotels, marinas, etc. According to a 2011 study, it shows 1.6 Billion dollars were spent on hunting and fishing in Washington State. This is attached.

Major Problems with the plan:

1. WDFW Commission, is its Policy body, was never reported to, advised, nor asked for recommendations. The commission is part of WDFW and should not have been excluded. Now is their chance to right this wrong.

2. A new lower coast wide impact rate was the only requirement to be applied to the Stilly. NMFS (Feds) requirement was that it be dropped from the previous rate of 25% to 24% (Alaska, Canada, and lower U.S.) coast wide. The SUS portion (southern U.S. below the Canadian border) was previously managed to be below 15%. (The 15% is combined-us and the tribes.) Between us and our neighbors to the north, we needed to stay below the new overall 24% rate. Somewhere a new 8% impact rate was agreed to and changed from a target to a ceiling or cap. ***We have asked WDFW repeatedly who required this new low of 8%? To date-Still No Answer.***

3. Not only was the 8% agreed to but it was not modeled across past fisheries to see how they would have played out. You have to know how any new plan effects the future by applying it to the past. Especially before being handcuffed to it for 10 years. It was modeled for us weeks after the plan was signed, per our request. In the past 5 years we averaged 13% showing that those our Puget Sound fisheries would have been cut In 2016 we had a no agreement at North of Falcon negotiations.

4. The Stilly Management Chinook was changed adding and protecting a hatchery Chinook. In doing this the entire management of that river has to be remodeled and changes made because of this. Agreeing to this Stilly component in its current form should never have been allowed. Once studied and new management applied, should lessen constraints on all other fisheries.

5. This plan penalizes all Washington State Saltwater Fisheries. It either completely closes or severely restricts all saltwater salmon fisheries. 3 of the 13 areas that will not be affected with Stillaguamish Chinook (Ilwaco, Westport, and Olympia) will still have repercussions from being the only place to fish with open seasons that will end quickly due to overwhelming crowds.



6. Top two WDFW fishery managers were out of the country and not there for the final negotiation/signing.

This nonrequired decision is detrimental to all of Washington State fisheries and our economy. This plan would only save approximately 9-10 Stilly Chinook on a non-recoverable river in its current state. Foregone Opportunity can be used by tribes to take our share too, when we are not even on the water. This needs to be mentioned.

This plan is a full circle destruction of WDFW and here is why:

Closed fisheries cuts funding as license sales will drop off dramatically.

These fees fund the department.

WDFW will not have adequate funding as license sales are a giant portion of their budget.

WDFW is causing lost support from almost all recreational fishers.

When fisheries are closed, Legislature will close hatcheries. Our license fees fund hatcheries. If we can't fish then legislature will not fund them.

Less hatchery fish will expose the few wild fish left to predators such as seals and sea lions.

(New study shows 86% of smolts are eaten by harbor seals in the Salish sea.)

The orcas we are trying to save thorough hatchery increases will be further harmed.

The wild fish will completely disappear.

As commissioners you took this seat to do the right thing for our resources. We want to make sure you understand what this plan really says and does. It drives the last nail in the Washington state salmon fisheries coffin. You were purposely left out of being able to manage and oversee decision making on this issue.

We see three options for you.

1. Do nothing and let this collapse happen on your watch
2. Talk with the tribes and them understand that we want the Stilly component of the plan revised. The 8% ceiling shall be changed to a target. The rest of the plan stays intact.
3. Completely pull out of the plan entirely.

At our Dec 20th meeting between WDFW Staff and Recreational Stakeholders, ***at the end, Director Unsworth told us he would be having a meeting with the Commission for them to tell him what to do.*** This is your chance to fix this. Direct Director Unsworth to alter the plan per above. If it cannot be done then tell him to rescind the plan.

We recommend to you, Commissioners, revising the portion of the Stilly for the plan, and feel is the best option. If we cannot get agreement then we have to pull out of the plan entirely. It is an option that you can take up with Mr Grossman of the AGs office. We have been told it is an option. I am sure you do not want the fisheries and businesses collapse to be on your watch. You have the chance to make a difference and save our Sound. Please do not accept this plan as is. I am available for you to answer questions and help guide you if needed. Feel free to contact me.

Thank you.

Sincerely,

Ron Garner

President

Puget Sound Anglers State Board

cc Honorable Jay Inslee, Governor
 Jim Unsworth, Director Washington Department of Fish & Wildlife
 Senate Natural Resources Kevin Van De Wege
 Mike Grossman, Washington Attorney General's Office
 Senator Maria Cantwell
 Congress Derek Kilmer
 Congress Jamie Herrera Beutler
 Congress Rick Larsen