



Washington's Largest Sportfish Organization supporting 16 Chapters Statewide

Puget Sound Chinook Harvest Management Plan Fact sheet

This plan is a disaster will equate to 10s of thousands of job losses. You received a Dec. 28 letter from George Harris of Northwest Marine Trade Association describing this troubling situation to you on behalf of its Washington state 725 businesses it represents.

Reasons for not signing plan-Stillaguamish River Chinook is main problem of the plan:

1. This plan was not well thought out and modeled to see how it would affect all saltwater fisheries. The real facts of the Stilly do not support it. It is going to cause massive closures and severe restrictions on our saltwater salmon fisheries. This is sparking total outrage, not setting well with the general fishing public nor legislators. both federal and state.
2. The general public now has a good understanding of what happened here. WDFW took steps to appear as taking the high moral ground of conservation to benefit the Stillaguamish River Chinook. But after thorough investigation cutting fisheries does nothing for conservation. It does however set up Washington state businesses to fail, crush a major part of our hunting and fishing \$1.6 billion states annual income, and tells recreational fishers to go fish somewhere else. WDFW is getting ready to ask for a fishing license fee increase from us. Why should they be rewarded?
3. Plan was signed by WDFW for State without any and all WDFW Commissioners (Policy Makers) review or stakeholder input. Outcome would have been much different with commission and/or input.
4. The Stillaguamish River, in its current form, cannot recover its wild Chinook due to habitat and water quality problems-even if all fishing was shut down from Alaska to California. ***This river is broken.*** See #10 below.
5. NMFS only required that we drop the Stilly impacts from a previous 5 year plan from 25% down to 24%. westcoast wide. We had held the Southern US (south of the Canadian border) to 15% which still was acceptable. This 15% is combined tribal and non tribal.
6. The Stilly component drops the SUS 15% rate to 8% and changes it from a target to a ceiling that cannot be exceeded. Was not required. We could have stayed with the Federal 24% NMFS guideline.
7. The Plan was signed without modeling how this 8% Stilly cap would affect our fisheries future and how it would have effected previous fisheries. WDFW modeled, per our request, and brought us the info on Dec 20th with recreational leaders meeting #2. How could they make solid decisions without having this ***before*** negotiations?
8. WDFW and recreational leaders meeting #2, Staff brought Stilly 8% ceiling modeling applied to years 2013-2017. 2013-15.7%, 2014-10%, 2015-13.6%, **2016-14.2%**. 2017-11.5%. All years are way over the 8%. **Remember 2016 when non tribals didn't hardly fish due to non agreement at North of Falcon? We were still 6.2% over the new 8% ceiling! Let that sink in.** These numbers are for both tribal and non-tribal. These not so great fishing years would have had to been severely constrained for an unrecoverable fish in its



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current form. This modeling should have been done and used when negotiating the Stilly portion, not weeks later.

9. Page 167 from the PS Chinook RMP, " **Due to the limited productivity of existing habitat, it is unlikely that fishery actions alone can rebuild abundance of Stillaguamish Chinook to higher levels. "**

10. **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."

11. The constraints put on our Salmon Fisheries from the Stilly component alone, will shut down Puget Sound Salmon fisheries completely in some areas and allow for very small openings in others from La Push on the Washington Pacific Ocean, through the Strait, San Juans, and down to Tacoma. This will only save approximately 9-10 Chinook on a river that cannot support wild Chinook. If habitat is not going to be fixed and/or a new state of the art hatchery built, wild these stocks are going to die off whether we fish or not.

12. Why did WDFW go so far on to sign this Stilly component? It was not required. They could have held at Status Quo. WDFW told us they split up into groups and worked with different tribes to negotiate the plan for each area. In negotiations one side starts high and the other starts low and you should end up somewhere in between. Did WDFW just sign off with no negotiation and take what was on the table? To date there has been no answer why they went far beyond what was required. The Stillaguamish has very little suitable habitat for spawning.

13. The Stilly Chinook previously used for the management unit went from an ESA Wild Natural Origin River Fish to a marked hatchery fish. No other river has ever done this and requires the management to change for our marked select fisheries for using a marked fish. The management unit of this river is going to have to be changed to meet different criteria to use a marked select fish that all of our Puget Sound Chinook Fisheries are designed and managed for. This alone should kick the Stilly out from the plan.

14. Meeting #2 George Harris of NMTA asked WDFW staff if this was the end of salmon fishing in the Puget Sound? They told us no they did not think so. The rest of us believe it is, because there is a tipping point and we are reaching it. An aluminum boat manufacturer in Colville, Washington just purchased a large parcel of land across the street from its current facility to build a new state of the art, bigger and better manufacturing plant. He was advised not to build it. Another issue-After just a small release of the Puget Sound Chinook Harvest Management Plan, one boat sales company reported that two new boat building orders were cancelled and checks had to be returned. Just those two boats lost \$235,550 in sales. This is all lost revenue to the state.

15. This is not a tribal issue and we are afraid that this could blow up between us and the tribes. This is a time when we need each other the most and have been working with them trying to repair our relationships.

16. Director Jim Unsworth and Fish Program Manager Ron Warren were both out of country when this plan was finalized and signed. Had Ron been there this would not have gone down this way.



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Salmon recovery concerns:

A. Out of control predation. "Harbor seals in the Salish Sea (i.e. Puget Sound, Strait of Georgia, and Strait of San Juan de Fuca) accounted for 86.4% of the total coast wide smolt consumption in 2015, due to large increases in the harbor seal abundance in this region between 1975 and 2015 (8,600 to 77,800)"
From Scientific Reports published Nov 20, 2017 and acknowledgments were made to NMFS staff as well as many scientists. Also supported by the Pacific Salmon Commission.

B. Lack of abundance of hatchery fish to create a buffer for wild fish stocks to get through predators, commercial, and recreational fisheries to Northern BC and Alaska and back home. The Columbia River and Willapa Chinook hatcheries carried the brunt of the load for many years as sacrificial fish for our ESA Puget Sound Wild Chinook Stocks up north. Now that those hatcheries have been slashed, our PS stocks are totally exposed and might not be able to recover. Canadian and Alaska fisheries are taking too many of our fish. ESA seems to be paid for at the home waters. Not acceptable.

C. Lack of healthy habitat and estuaries as well as a polluted Puget Sound. We are still losing habitat faster than it is being restored. Washington has the nation's largest building boom. Bigger than LA and New York.