

7. OCEAN SHRIMP TRAWL REGULATIONS – (RULE BRIEFING & PUBLIC HEARING)

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“GREEN SHEET”

Meeting date:	January 8, 2010
Agenda item #7:	Ocean Shrimp Trawl – Establish Fishery Permit; Require Participation in Observer Programs as Condition of Permit – (Rule Briefing and Public Hearing)
Staff Contact:	Lorna Wargo, Marine Fish Biologist, Fish Program
Presenter(s):	Lorna Wargo, Marine Fish Biologist, Fish Program

Background:

The Washington pink shrimp fishery represents one of the more stable commercial opportunities on the coast; resource abundance fluctuates but is deemed healthy; and through industry innovation and regulation, the use of fish excluders has reduced the catch of non-shrimp species. Management of the Washington shrimp trawl fishery is achieved through a fixed season with rules governing mesh size, shrimp size, and excluders. The trawl fleet operates out of Westport and Ilwaco, and supports processors in each. The average annual total direct value of the fishery is about \$3 million and whereas, the average direct value to individual fishers was about \$60K up to 2000, since then the average has been over \$100K per fisher due to the declining numbers of participants. In 2008, the direct value per fisher was approximately \$200K. The fishery is limited to approximately 80 coastal pink shrimp licenses; of which, only about two dozen are actively fished each year and even fewer than that account for the majority of catch.

In March 2009, the National Marine Fisheries Service (NMFS) proposed listing the southern Distinct Population Segment of *Thaleichthys pacificus*, also known as “eulachon,” as threatened under the Endangered Species Act. Bycatch of eulachon in commercial fisheries, including the Washington ocean pink shrimp (*Pandalus jordani*) trawl fishery, was identified as a moderate threat to the eulachon population. Bycatch rates of eulachon and other non-shrimp species in the Washington ocean shrimp trawl fishery are unknown. To address this lack of data, the Department is proposing to require Washington licensed shrimp trawl vessels participate in the NMFS West Coast Groundfish Observer Program (WCGOP). Both Oregon and California already require shrimp trawl fishers to participate in this federal observer program.

The WCGOP was established in 2001 primarily to collect catch and biological data from randomly selected vessels in the groundfish trawl fishery. Under federal rules trawl vessel participation in the observer program is mandatory if groundfish are retained. The Washington ocean shrimp trawl fishery catches but does not retain groundfish, and thus vessels are exempted from having to carry a federal observer.

In order to collect bycatch information from the Washington ocean pink shrimp fishery, the Department proposes to develop a permit, to be issued annually and at no cost to fishers, that would describe conditions to be met including that vessels participate in the federal groundfish observer program. Fishers will incur some cost to board observers, however, the shrimp trawl fishery risks more stringent regulation due to the absence of data as managers seek to ensure protection of marine fish resources.

Policy issue(s) you are bringing to the Commission for consideration:

Does the Commission wish to require the participation of Washington ocean shrimp trawl license holders in the National Marine Fisheries Service's West Coast Observer Program to improve the data and information available to managers to ensure that the conservation needs for eulachon and other species are met while reducing the potential for lost fishing opportunity?

Public involvement process used and what you learned:

In October, an informal meeting was held at Westport for a dozen shrimp trawlers still active in the fishery at that time. Those in attendance were supportive of the proposal. Most had experience carrying observers through their participation in groundfish trawl fisheries and spoke very positively about the WCGOP and the individual observers themselves. Industry members recognize that regulatory actions in the absence of information are likely to be more restrictive than they otherwise might be if bycatch data were available.

A letter with the proposed rule change was mailed to all Washington shrimp trawl license holders in November. All license holders were also notified in the letter of an additional meeting held December 2, 2009 at the regional office at Montesano. Only two individuals attended the December meeting. Their primary concern had to do with the small size of their vessel and the difficulty and safety issues posed if they are required to carry an observer. After the meeting, this concern was conveyed to the WCGOP coordinator and there is a waiver process in place for safety/vessel size issues. This information will be provided industry in a future letter.

Action requested:

This is the rule briefing and public hearing opportunity. The Commission will consider final adoption of the rule proposal at its February 5-6, 2010 meeting.

Draft motion language:

NA

Justification for Commission action:

The Washington shrimp trawl fishery is a vital component of the coastal fishing community and has provided a relatively stable opportunity compared to other commercial trawl fisheries in recent years. Requiring shrimp trawl vessels to carry federal observers will reduce the existing data gap, which in turn will allow fishery managers to better understand and estimate bycatch in the shrimp trawl fishery.

Communications Plan:

1. Hold initial meeting at Westport with active fishers (October 16, 2009).
 2. Notify all license holders by mail, include rule proposal and rationale (November 13, 2009); announce public meeting for December 2, 2009 in letter.
 3. Hold public meeting at Montesano Region 6 office for all license holders.
 4. Distribute rules and CR 102 by December 7, 2009 to all license holders, include summary of comments from December 2 meeting; invite comments for the January Commission meeting.
 5. Provide written notification of outcome following February Commission meeting – incorporate in annual letter to industry.
 6. If rule proposal adopted, schedule meeting with industry prior to shrimp trawl season opening at Westport in April to provide Q&A opportunity with federal observer program representative.
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48 Devonshire Road • Montesano, Washington 98563 • (360) 249-4628 • FAX (360) 664-0689

November 13, 2009

Dear Shrimp Trawl License Holder:

This letter is to inform you of rule changes the Washington Department of Fish and Wildlife (Department) is proposing for the ocean shrimp trawl fishery.

In March 2009 the National Marine Fisheries Service (NMFS) proposed to list the southern Distinct Population Segment of *Thaleichthys pacificus*, also known as eulachon, or commonly called Columbia River smelt or candlefish, as threatened under the Endangered Species Act.

Bycatch of eulachon in commercial fisheries, including the Washington ocean shrimp (*Pandalus jordani*) trawl fishery was identified as a moderate threat to the eulachon population. Bycatch rates of eulachon in the Washington ocean shrimp trawl fishery are unknown. Limited data exists for eulachon bycatch in the Oregon and California shrimp trawl fisheries through their participation in the National Marine Fisheries Service's West Coast Groundfish Observer Program (WCGOP).

It should be noted that NMFS is just proposing to list to eulachon; it has not actually declared them threatened yet. Also, the determination that shrimp trawling poses a moderate threat to the eulachon population does not mean that shrimp trawling has been identified as the cause of the decline.

However, to address the lack of data regarding the incidence of eulachon and as importantly, other non-shrimp species in the Washington ocean shrimp fishery, the Department is proposing to require all ocean shrimp trawl license holders participate in the National Marine Fishery Service's West Coast Groundfish Observer Program (WCGOP). As a participant in the program, vessels would be required to carry a federal observer upon request and comply with WCGOP regulations.

Under the Department's proposal, shrimp trawl license holders would be issued a permit, listing conditions to be met while fishing. An example of a permit is enclosed. The permit would be issued annually, at no cost. Vessels carrying

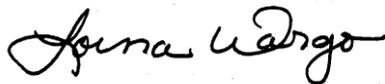
federal observers are required to provide them meals; all other costs (personal equipment, insurance, etc) is covered by the WCGOP.

In October, an informal meeting was held at Westport for shrimp trawlers still active in the fishery at that time. Those in attendance were generally supportive of the proposal. To provide all license holders an opportunity to discuss this issue, another **informational meeting is scheduled for 2 p.m. Wednesday, December 2, at the WDFW Region 6 office** at Montesano.

This proposal will be presented to the Washington Fish and Wildlife Commission at their January 8-9, 2010 meeting for their consideration; public testimony will be taken at this meeting. A package of information including the proposed rule language, an issue statement (also known as the "green sheet"), and instructions for providing public comment and/or testimony will be mailed to all ocean shrimp trawl license holders in early December.

For questions or more information, please call or email me at: (360) 249-1221; Lorna.Wargo@dfw.wa.gov

Sincerely,



Lorna Wargo
Marine Fisheries Biologist

cc: Michele Culver, WDFW, Regional Director
Craig Burley, WDFW, Fish Program, Division Manager

Enclosure (2)

For more information about the proposed listing of eulachon or the West Coast Groundfish Observer Program go to:

Eulachon:

http://www.nmfs.noaa.gov/pr/species/fish/pacific_eulachon.htm

<http://www.nwr.noaa.gov/Other-Marine-Species/Eulachon.cfm>

West Coast Groundfish Observer Program:

<http://www.nwfsc.noaa.gov/research/divisions/fram/observer/>



PROPOSED RULE MAKING

CR-102 (June 2004)

(Implements RCW 34.05.320)
Do NOT use for expedited rule making

Agency: Washington Department of Fish and Wildlife

- | | |
|---|---|
| <input checked="" type="checkbox"/> Preproposal Statement of Inquiry was filed as WSR 09-18-066; or | <input checked="" type="checkbox"/> Original Notice |
| <input type="checkbox"/> Expedited Rule Making--Proposed notice was filed as WSR _____; or | <input type="checkbox"/> Supplemental Notice to WSR _____ |
| <input type="checkbox"/> Proposal is exempt under RCW 34.05.310(4). | <input type="checkbox"/> Continuance of WSR _____ |

Title of rule and other identifying information: (Describe Subject) WAC 220-52-050, Ocean pink shrimp trawl fishery – Coastal waters.

Hearing location(s):

Natural Resources Building ~ First Floor, Room 172
1111 Washington St. SE
Olympia, Washington 98504

Date: January 8-9, 2010 Time: 8:45 a.m.

Submit written comments to:

Name: Rules Coordinator
Address: 600 Capitol Way No., Olympia, WA 98501-1091

e-mail Lori.Preuss@dfw.wa.gov
fax (360) 902-2155 by (date) December 31, 2009

Assistance for persons with disabilities: Contact

Susan Yeager by December 31, 2009

TTY (360) 902-2207 or (360) 902-2267

Date of intended adoption: On or after February 5, 2010
(Note: This is NOT the effective date)

Purpose of the proposal and its anticipated effects, including any changes in existing rules: The Department is proposing to require Washington licensed pink shrimp trawl fishers to carry, when requested, federal- or state-employed observers during commercial shrimp fishing trips.

Reasons supporting proposal: The coastal shrimp trawl fishery takes but does not retain groundfish, which exempts it under federal rules from having to carry a federal observer when requested. Without observer coverage, information about bycatch cannot be collected. In data-poor situations, management must be more conservative to address the uncertainty than might otherwise be necessary had adequate information been available. This rule change proposal will include Washington licensed shrimp trawlers under the National Marine Fisheries Service West Coast Groundfish Observer Program.

Statutory authority for adoption: 77.12.047

Statute being implemented: 77.12.047

Is rule necessary because of a:

- | | | |
|-------------------------|------------------------------|--|
| Federal Law? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Federal Court Decision? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| State Court Decision? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
- If yes, CITATION:

DATE
November 18, 2009

NAME (type or print)
Lori Preuss

SIGNATURE

TITLE
Rules Coordinator

CODE REVISER USE ONLY

OFFICE OF THE CODE REVISER
STATE OF WASHINGTON
FILED

DATE: November 18, 2009
TIME: 10:10 AM

WSR 09-23-117

(COMPLETE REVERSE SIDE)

Agency comments or recommendations, if any, as to statutory language, implementation, enforcement, and fiscal matters:

None.

Name of proponent: (person or organization) The Washington Department of Fish and Wildlife

- Private
- Public
- Governmental

Name of agency personnel responsible for:

	Name	Office Location	Phone
Drafting.....	Lorna Wargo	1111 Washington Street, SE, Olympia, WA 98504	(360) 753-2600
Implementation	Jim Scott	1111 Washington Street, SE, Olympia, WA 98504	(360) 902-2651
Enforcement.....	Chief Bruce Bjork	1111 Washington Street, SE, Olympia, WA 98504	(360) 902-2373

Has a small business economic impact statement been prepared under chapter 19.85 RCW?

Yes. Attach copy of small business economic impact statement.

A copy of the statement may be obtained by contacting:

Name:

Address:

phone () _____

fax () _____

e-mail _____

No. Explain why no statement was prepared.

Is a cost-benefit analysis required under RCW 34.05.328?

Yes A preliminary cost-benefit analysis may be obtained by contacting:

Name:

Address:

phone () _____

fax () _____

e-mail _____

No: Please explain: This proposal does not involve hydraulics.

Small Business Economic Impact Statement

1. Description of the reporting, record keeping, and other compliance requirements of the proposed rule.

The proposed rule will require Washington licensed commercial shrimp trawlers to participate in the National Marine Fisheries West Coast Groundfish Observer Program (Program). When requested by the Program, vessels will be required carry an observer for a specified number of fishing trips.

Vessels selected for observer coverage must report or provide advance notice of their intended departure date/time. This is accomplished through a telephone call. During any observed trip, a logbook will need to be maintained. Logbooks are provided at no cost to fishers.

Vessels in the Program must comply with federal regulations for the Program. These regulations include provisions for vessel safety, observer access to facilities, observer access to information, food and accommodations, access to communication equipment, and

2. Kinds of professional services that a small business is likely to need in order to comply with such requirements.

None.

3. Costs of compliance for businesses, including costs of equipment, supplies, labor, and increased administrative costs.

Shrimp trawl vessels will incur additional costs for food to provide observers meals as required by federal regulations. Vessels must meet U.S. Coast Guard safety requirements to have observers onboard; some vessels may incur costs to correct deficiencies in meeting these standards.

4. Will compliance with the rule cause businesses to lose sales or revenue? No.

5. Cost of compliance for the ten percent of businesses that are the largest businesses required to comply with the proposed rules, using one or more of the following as a basis for comparing costs:

- (a) Cost per employee;**
- (b) Cost per hour of labor; or**
- (c) Cost per one hundred dollars of sales.**

- (a) The typical shrimp trawl vessel operates with a crew of three, including the skipper. The expected cost of compliance is estimated at \$25 per day as the vessel will be

expected to provide food for the observers. The typical vessel averages 16 days of fishing per month during a seven month fishing season. However, observers will be deployed on about fifty-percent of the trips. This equates to a daily cost per crew of about \$4.

Typical Number Days Per Season	112
Cost per Day	\$ 25
Cost per Season (x 56 days for 50% coverage)	\$1,400
Number of Crew	3
Daily Cost per Crew for Season	\$ 4

Now compare the largest businesses' cost of compliance with the cost of compliance for small businesses. Will this rule have a disproportionate impact on small businesses?

No. Essentially all the business affected would be considered small businesses.

6. Steps taken by the agency to reduce the costs of the rule on small businesses, or reasonable justification for not doing so.

The Department will provide fishers with logbooks. Additional steps to reduce costs are not intended as these could compromise either the safety or comfort of the observers or hinder their ability to perform their duties.

7. A description of how the agency will involve small businesses in the development of the rule.

The Department will meet informally with industry participants, provide written materials through mailings and provide an opportunity for formal comment through the Washington Fish and Wildlife Commission public meetings.

8. A list of industries that will be required to comply with the rule.

Washington coastal shrimp trawl license holders

9. An estimate of the number of jobs that will be created or lost as the result of compliance with the proposed rule. NA

AMENDATORY SECTION (Amending Order 03-30, filed 2/18/03, effective 3/21/03)

WAC 220-52-050 Ocean pink shrimp trawl fishery--Coastal waters. It is unlawful to fish for, possess or deliver ocean pink shrimp taken for commercial purposes from the waters of the Exclusive Economic Zone, except as provided for in this section:

Area

(1) ~~((Ocean pink shrimp fishery:~~

~~(a))~~ It is unlawful to fish for ocean pink shrimp within the territorial boundaries of the state. A violation of this subsection is punishable under RCW 77.15.550, Violation of commercial fishing area or time--Penalty.

Season

(2) It is unlawful to fish for, take, or possess on board a fishing vessel, pink shrimp, except during the following time: The open season for trawl gear is April 1 through October 31 of each year. A violation of this subsection is punishable under RCW 77.15.550, Violation of commercial fishing area or time--Penalty.

~~((b) The following gear is prohibited:))~~

Gear

(3) It is unlawful to fish with or possess pink shrimp taken with shrimp trawl gear having a net mesh size greater than two inches in the intermediate or codend, except for net mesh used in ~~((fish excluder devices.))~~ by-catch reduction devices defined under subsection (4) of this section. However, it is lawful to have net mesh larger than two inches in the wings or body of the trawl.

~~((c))~~ (4) It is unlawful to fish with trawl gear for pink shrimp for commercial purposes unless an approved by-catch reduction device is used in each net. Approved by-catch reduction~~((s))~~ devices ~~((are))~~ include:

~~((i))~~ (a) A Soft Panel By-catch Reduction Device, which uses a mesh panel to guide fish out of an escape hole. An approved soft-panel must meet the following criteria:

~~((A))~~ (i) The panel must completely cover some portion of the net in cross-section, meaning it must extend completely across the full opening of the net in one continuous piece. The panel must be securely fastened to the net around the entire perimeter, such that a 110 mm diameter sphere cannot pass beyond the panel into the terminal end of the codend;

~~((B))~~ (ii) The panel meshes must be constructed of netting material with individual meshes no larger than 5.5 inches, measured between opposing knots, and must be constructed of a single panel of continuous netting, without zippers or other devices designed to

allow disabling of the panel such that large fish can pass back into the codend;

~~((C))~~ (iii) The escape hole must, when spread open, expose a hole of at least 100 square inches; and

~~((D))~~ (iv) The escape hole must be forward of the mesh panel and must begin within four meshes of the furthest aft point of attachment of the mesh panel to the net ~~((7))~~.

~~((ii))~~ (b) A Nordmore Grate By-catch Reduction Device, which uses a rigid panel of narrowly spaced vertical bars to guide fish out of an escape hole in front of the panel, generally in the top of the net. An approved Nordmore grate must meet the following criteria:

~~((A))~~ (i) The exterior circumference of the rigid panel must fit completely within the interior circumference of the trawl net, such that there is no space between the panel and the net that will allow a 110 mm sphere to pass beyond the panel, into the terminal area of the codend;

~~((B))~~ (ii) None of the openings between the vertical bars in the rigid panel may exceed two inches in width;

~~((C))~~ (iii) The escape hole must, when spread open, expose a hole of at least 100 square inches; and

~~((D))~~ (iv) The escape hole must be forward of the rigid panel and must begin within four meshes of the furthest aft point of attachment of the rigid panel to the net.

~~((d) All by-catch reduction devices and codends used for trawl fishing for pink shrimp must be readily accessible and made available for inspection at the request of an authorized agent of the state. No trawl gear may be removed))~~ (5) It is unlawful to remove trawl gear from the vessel prior to offloading of shrimp.

~~((e))~~ (6) It is unlawful to modify by-catch reduction devices in any way that interferes with their ability to allow fish to escape from the trawl, except for the purpose of testing the by-catch reduction device to measure shrimp loss. Authorized testing of by-catch reduction devices must meet the following criteria:

~~((i))~~ (a) Testing is allowed by special permit only, consistent with the terms and conditions of the permit; and

~~((ii))~~ (b) For vessels fishing two nets simultaneously (double-rigged boats), only one net may contain a disabled by-catch reduction device, and the other net must be fishing a fully functional by-catch reduction device as described in ~~((e) of this))~~ subsection (4) of this section.

~~((f) Minimum number of shrimp per pound:))~~ (7) A violation of subsections (4) through (6) of this section is punishable under RCW 77.15.520, Commercial fishing--Unlawful gear or methods--Penalty.

(8) It is unlawful to land or deliver pink shrimp to an original receiver that exceeds the following count per pound restriction: The count per pound must average no more than 160 shrimp per pound for a minimum of two samples, increasing at a rate of one sample per one thousand pounds landed or in possession, up to a maximum requirement of twenty samples. Such samples shall consist ~~((s))~~ of at least one pound ~~((of))~~ each of whole, unbroken shrimp taken at random from throughout the individual load landed

or in possession. This landing restriction shall apply only to loads of 3,000 pounds of shrimp or more. A violation of this subsection is punishable under RCW 77.15.550, Violation of commercial fishing area or time--Penalty.

Incidental catch

~~((g) Incidental catch-finfish:))~~ (9) It is unlawful to take salmon incidental to any shrimp trawl fishery.

(10) It is unlawful to retain any bottomfish species taken incidental to any shrimp trawl fishery, except as provided for in WAC 220-44-050.

~~((h) Incidental catch-shellfish:~~

~~(i) It is unlawful to retain any species of shellfish except that it is lawful to retain up to 50 pounds round weight of other shrimp species taken incidentally in the ocean pink shrimp fishery, or octopus or squid.~~

~~(ii) It is unlawful to fish for ocean pink shrimp within the territorial boundaries of the state.~~

~~(i))~~ (11) It is unlawful to retain any species of shellfish, except that it is permissible to:

(a) Retain up to 50 pounds round weight of other shrimp species taken incidentally in the ocean pink shrimp fishery; and

(b) Retain octopus or squid.

(12) A violation of subsections (9) through (11) of this section is punishable under RCW 77.15.550, Violation of commercial fishing area or time--Penalty.

License

(13) An ocean pink shrimp delivery license is ~~((the license))~~ required to operate the gear provided for in this section, and it allows the operator to retain shrimp taken in the waters of the Exclusive Economic Zone.

~~((2) Fisheries for shrimp species other than ocean pink shrimp or ocean spot shrimp: Species other than ocean pink shrimp and ocean spot shrimp may only be taken incidentally to the ocean pink shrimp and ocean spot shrimp fisheries.))~~ A violation of this subsection is punishable under RCW 77.15.500, Commercial fishing without a license--Penalty.

Permit

(14) It is unlawful to fish for, retain, land, or deliver shrimp taken with trawl gear without a valid shrimp trawl fishery permit.

(15) It is unlawful to take, retain, land, or deliver any shrimp or groundfish taken with trawl gear without complying with all provisions of a shrimp trawl fishery permit.

(16) A violation of subsection (14) or (15) of this section is punishable under RCW 77.15.750.

Wargo, Lorna L (DFW)

From: Preuss, Lori (DFW)
Sent: Tuesday, January 05, 2010 2:25 PM
To: Wargo, Lorna L (DFW)
Subject: FW: support of proposed rulemaking WAC 220 52 050

From: Craig Urness
Sent: Tuesday, January 05, 2010 2:24 PM
To: Preuss, Lori (DFW)
Subject: support of proposed rulemaking WAC 220 52 050

Dear Ms. Preuss:

I am writing on behalf of Washington Crab Producers, Inc. in support of the proposed rule requiring Washington licensed pink shrimp trawl fishers to carry, when requested, ... an observer ...

Sincerely,

Craig Urness
General Counsel

TO: Washington Department of Fish and Wildlife
Rules Coordinator
600 Capitol Way North
Olympia, WA 98501-1091

FROM: Paul Daniels

DATE: December 17, 2009

SUBJECT: WAC 220-52-050 Ocean Pink Shrimp
Proposed Rule Making
Pink Shrimp Trawl Observers

Over the past five years the industry has had, in general, the following production averages:

- Annual production of 6,000,000 pounds
- Value to the fishers of \$2,500,000
- 16 fishing vessels participating with six vessels producing most of the production and ten vessels making random landings while participating in other fisheries
- Crew size is captain and two deckhands
- The value of pink shrimp after it has been processed is increased to \$20,000,000 – \$30,000,000 depending on wholesale markets
- Our shrimp is marketed internationally—especially to European countries

Washington shrimp fishers have voluntarily worked with management in the development of by-catch reduction devices (BRD) over the past decade. Let me give an example: the bar spacing of the Nordmore Grate shall not exceed 2" per WDFW. The fishermen I know are using a spacing of 1" to 1 1/4". Also the 100 sq. in. escapement hole minimum has been made considerably larger by fishers. I, personally, am developing new grates for my nets of 7/8". This is an evolutionary process with us fishermen as we are constantly improving our product quality and reducing our by-catch to supply our markets. We are also very selective as to our harvesting grade by not targeting small shrimp.

WDFW is proposing that licensed pink shrimp trawl fishers carry observers when requested to document our by-catch. We would welcome this participation from marine fisheries management. We see fishers and management's benefits as being:

- Documentation of actual by-catch by volume
- Documentation of by-catch by species
- Documentation of the physical size and fishing characteristics of the BRD's. Functions of the BRD are to exclude fish, maintain water flow, improve product quality, just to name a few.
- Give us a baseline for establishing development of trends. For example, we fishers know the ocean is very cyclical—a well managed baseline will allow us to work with WDFW management in anticipating problems and formulating solutions.

In conclusion we fishers welcome proactive management and look forward to working with your biologist.

Respectfully,



Paul A. Daniels

4' Dia BRD installed in
a net

Fish escape hole

