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Miranda Wecker, Chairwoman
Washington State Fish and Wildlife Commission
600 Capitol Way N.
Olympia, WA 98501-1091

26 Oct 2015

RE: North Coast Steelhead Advisors Group's Recommendations

Dear Chairwoman Wecker and Members of the Commission:

We are writing to you today to voice the City's position regarding the recommendations from the North Coast Steelhead Advisors Group regarding steelhead management. We appreciate the Advisors Group's efforts. Our comments below are focused on the recommendations and our belief of their potential impacts to our community. However, we are adamant in our belief that there is a collective want, and need, by all involved to ensure the long term viability of our steelhead fishery.

First, and foremost, the underlying issue that is not being addressed within these recommendations is the fact that the North Coast has had a limited, if any, level of enforcement on a regular, repeated basis. Adopting new rules and regulations to address the fact that current rules and regulations are not being enforced is not efficient, effective, nor good management. In addition, adding additional rules to an already complex rule system creates huge latitude for individual interpretation that then is compounding the issues arising from a lack of adequate enforcement.

Second, we would ask the Commission to share the meeting minutes of the Advisor Group as the recommendations forwarded to you for consideration mention the making of "significant compromises" to reach their recommendations. We feel that those compromises need to be shared and explored, as some of the recommendations do not appear to be compromises at all.

Third, the Advisor Group has various stakeholder participants, however, the term stakeholder here only included those that were associated with sport fishing, professional guides, enthusiasts, and/or advocates; and, did not include the larger business community that exists alongside these dedicated enthusiasts. While some may have been endorsed by communities, they did not bring to the table some of the socio-economic impacts associated with their fishing passions and concerns. As a result, we cannot endorse the slate of proposed recommendations. However, some of the rules we do suggest be adopted, yet even those raise a level of concern

about their potential impact upon the larger business community of the North Coast. We find no record of any small business impact analysis associated with these rules. We highly recommend that any additional regulations being developed undertake such an analysis that would require outreach by the Department beyond the fishing stakeholders. Such outreach should include the anglers, guides, hospitality industry, forest land owners, and small businesses associated with the recreational fishing season. Keep in mind, that it was the concerns that many of our small businesses had with the previously failed attempt to develop a catch and release only rule that led the City vigorous oppose that proposal.

Fourth, we feel that the concept of an “interim” regulation is a misnomer. Once the Commission establishes the rule for the alleged “benefits” argued by its proponent, the rule then becomes a thing that is “vital to those interests” that created it. Before any North Coast wide rule is adopted, the Commission should be able to support the basis for the restriction with hard data showing an equal impact across all user groups. Unfortunately, that does not appear to be the result applied by the Advisors Group.

However, there are some of the recommendations that deserve consideration. In adopting any of these rules, however, there needs to be some level of effectiveness monitoring that helps determine if the rule is in fact creating the desired result envisioned.

1. Adopt the barbless hooks rule. This appears to be one of the proposals that could have direct benefit during the wild steelhead season. Applied to all anglers, this should reduce harm and impacts immediately to the species of concern.
2. Adopt the prohibition of internal combustion and/or electric motors on all North Coast Rivers. Such a practice is not common on the river systems on the North Coast, with the exception of the occasional small engine powered boat on the lower portions of the Quillayute River. Taking such an approach ensures the safety of the angler, as many of these rivers have underwater hazards that using such propulsion would only increase the hazardous nature of the river.
3. Adopt the limiting of the use of bait after 15 February to all rivers, but for the Quillayute River. This should have the added benefit of reducing the number of encounters, and thereby fish mortality, within these river systems.
4. Adopt and enhance the education efforts to encourage anglers to practice “catch, release, and move” fishing, while also educating anglers on proper handling and releasing of fish. Here there is a continual need for educating the angling public on the benefits of practicing “catch and release” with wild steelheads without imposing the no retention of wild steelhead rule recommended. The Commission, if not then the Department, will recall that the City raised significant legal and management concerns with the no retention rule proposed in the past. In part this was due to the realities of dealing with some who use their fishing license as a means of sustaining themselves and/or their families, as well as dealing with the situation where the caught fish is played out and dies. As it stands, it appears that less than 5% of the wild steelhead caught were actually retained. Most anglers practice no retention, and the new statistics affirm this.

5. Adopt a voluntary endorsement for North Coast steelhead. This appears to be a recommendation that if voluntary, could generate additional revenue that could be utilized to fund assessments and research on the North Coast steelhead populations that are collectively agreed to by all angling communities. In addition, depending upon how the endorsement is created, it could create an interest in fishing memorabilia collectors that may not fish the rivers in question, but are interested in contributing for the annual endorsement.

The following recommendations warrant additional review and input:

1. Review the one hook with up to three points rule. The effectiveness of this recommendation warrants further review and discussion. Focusing on the review of such a change in gear may further reveal other alternatives that could be more effective.
2. Review the prohibition on using floating devices on the Hoh River above Morgan's Crossing. This matter also warrants further review and discussion within the larger community as to what impacts, if any, this would have on the visiting anglers as well as the local anglers much more familiar with this stretch of water.

The following recommendations do not warrant adoption Coast Wide, but may be something to evaluate in the coming year with a larger level of input, on a river-by-river basis.

1. As discussed above, the adoption of a no retention of wild steelhead rule is questionable on a North Coast-wide basis. Where rivers are not meeting the established escapement agreed to by both Co-managers, then such a rule makes sense. However, where escapement is being met, adopting such a rule creates an 'untaken opportunity' that permits others to harvest those fish.

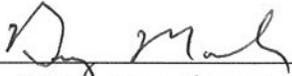
The inclusion of rainbow trout in this rule also makes little to no sense in that it appears to be an expansion of the scope of the Advisors Group charter which was to focus on Steelhead populations.

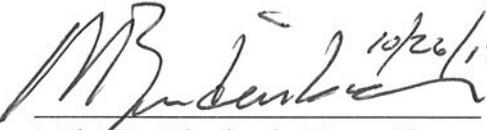
2. Limiting the number of guides. This is something that is beyond the ability of the Commission to enact and would take significant study and legislative authorization. In evaluating even this recommendation, significant work would be needed to address how guides were to be licensed in a limited pool program. Without the notes, or detailed explanations of the Advisor Groups deliberations, this recommendation seems a bit premature.

We look forward to the Commission's review of these recommendations and expect that we will have more involvement and engagement in the months to come.

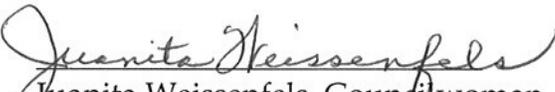
Please do not hesitate to contact the City to discuss further our collective concerns.

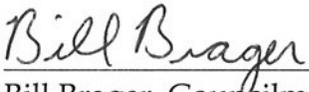
Sincerely,

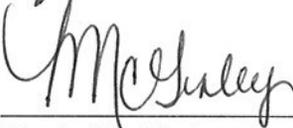

Bryon Monohon, Mayor

 10/26/15
Mike Breidenbach, Councilman

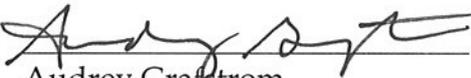
 10-26-15
John Hillcar, Councilman


Juanita Weissenfels, Councilwoman

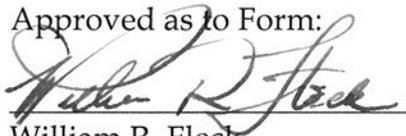
 10/26/2015 - Voted No
Bill Brager, Councilman

 10/26/15 - Voted No
Linda McGinley, Councilwoman

Authenticated and Attested to:


Audrey Grafstrom
Clerk/Treasurer

Approved as to Form:


William R. Fleck
Attorney/Planner