



January 6, 2013

Craig Burley  
Fish Division Manager  
600 Capitol Way N.  
Olympia, WA 98501-1091

RE: 2013-14 Sportfishing Rule Proposals; Reference ID: DFW332292

Dear Mr. Burley:

The Public Utility Districts of Chelan (Chelan PUD), Douglas (Douglas PUD), and Grant (Grant PUD) counties, (hereafter referred to as the mid-Columbia PUDs) each own and operate hydroelectric projects on the mid-Columbia River on the behalf of the citizens of our respective counties.

The mid-Columbia PUDs, through diligent work, have made great strides over the last 30 years in restoring, enhancing and protecting salmon and steelhead runs in the middle and upper Columbia River basin. These strides have occurred through significant investments and operational adjustments to protect the fisheries resources. Our actions have also resulted in fulfilling the various regulatory and legal requirements that govern the operation of our respective hydroelectric projects. We take great pride in the substantial improvements benefiting the Columbia River's anadromous fishery resources. Not surprisingly, proposed management actions that could contribute to or enhance that progress are of great interest to the mid-Columbia PUDs.

In a workshop hosted by the Bonneville Power Administration and Columbia Basin Fish and Wildlife Authority (September 2008), it was noted by Tom Friesen of the Oregon Department of Fish and Wildlife that smallmouth bass have expanded their range in the Pacific Northwest and that predation on salmonids by smallmouth bass has increased over the past 20 years. Mr. Friesen also stated that Chinook salmon have become a common food source of smallmouth bass throughout those portions of the Columbia and Snake rivers systems accessible to anadromous salmonids. The statements of Mr. Friesen are supported by the results of numerous studies of predation on juvenile salmonids by bass and walleye both in the Lower Columbia River (e.g., Poe et. al. 1991; Vigg et. al. 1991), and in the mid-Columbia River (Thompson et.al. 2012; Counihan et.al. 2012; BioAnalysts 2000; and Burley and Poe. 1994).

The mid-Columbia PUDs have invested substantial financial resources to protect, enhance and restore salmon and steelhead in the mid and upper Columbia Basin and we strongly believe that

measures and options to aid in the recovery of ESA listed species (such as threatened upper Columbia River steelhead and endangered upper Columbia River spring Chinook) to meet regional recovery goals should include aggressive management of predacious, invasive species. The mid-Columbia PUDs strongly encourage the Washington Department of Fish and Wildlife to adopt the proposed rule change, removing the size restrictions and daily catch limits for bass and walleye and daily catch limits for channel catfish in the Columbia River, Snake River and their tributaries. We believe that implementing the proposed rule change will reduce the impact of non-native fish predation on rearing and out-migrating salmon and steelhead, thereby aiding in the recovery of ESA listed upper Columbia River stocks.

Sincerely,



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Bill Dobbins  
General Manager – Public Utility District No 1 of Douglas County, Washington



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John Janney  
General Manager – Public Utility District No 1 of Chelan County, Washington



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Tony Webb  
Interim General Manager – Public Utility District No 2 of Grant County, Washington

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- Counihan, T.D., Hardiman, J.M., Burgess, D.S., Simmons, K.E., Holmberg, G., Rogala, J.A., and Polacek, R.R., 2012. Assessing native and introduced fish predation on migrating juvenile salmon in Priest Rapids and Wanapum Reservoirs, Columbia River, Washington, 2009-11: U.S. Geological Survey Open-File Report 2012-1130, 68p.
- Poe, T.P., Hansel, H.C. Vigg, S., Palmer, D.E., and Prendergast, L.A., 1991. Feeding of predaceous fishes on out-migrating juvenile salmonids in John Day Reservoir, Columbia River: Transactions of the American Fisheries Society, v. 120, pg. 405-420.
- Thompson, A.M., O'Connor, R.R., Timko, M.A., Sullivan, L.S., Rizer, S.E., Hannity, J.L., Wright, C.D., Fitzgerald, C.A., Meagher, M.L., Stephenson, J.D., Skalski, J.R., and Townsend, R.L., 2012. Evaluation of downstream juvenile steelhead survival and predator-prey interactions using JSATS through the Priest Rapids Reservoir in 2011: Final Report submitted to Grant County Public Utility District No. 2 of Grant County, Wash.
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