

Comments on the DNS 21-054: Non-native Game Fish and Fisheries Policy.

Comment Period 11/5/2021 - 11/19/2021

Committer or number of similar comments	Comments	Agency Response
Bob Harriman	See attachment 1	Thank you for your comment. The targeted control section is intended to allow our agency to continue the management of some of our trout fisheries in eastern Washington with rotenone treatments and trout fry/fingerling plants. It may also allow fairly localized control of species during short duration, high predation events. Many of these actions may require additional public input in the future through the SEPA process before the action is undertaken.
Rich Pratt	<p>Thank you for allowing SEPA comments on the above subject reference.</p> <p>I approve of this Non-Native Game Fish policy as guidance to WDFW & the Wildlife Commission for the future management of Native & Non-Native fish in the State of Washington. I feel WDFW’s mandated protections & promotions both for Recreationally & Consumptively are being adhered to in this policy. I also feel that protections in this policy would provide best environmental science for native fish species accordingly to their best suited habitat & conditions while at the same time allowing Non-Native best science management in waters that are not best suited for Native species and/or has insignificant adverse effects to non-endangered native gamefish.</p> <p>I am in favor of the WDFW recommended options in the categories noted for Population, Fishing Regulations, Introduction/Supplementation/Translocation, Habitat, & Illegal Introduction, excepting Targeted Control. I am not in favor of Targeted Control unless amended for specific emergency nature when normal timeline management could be an immediate detriment to Native game fish species or similar emergency.</p>	Thank you for your comment. The targeted control section is intended to allow our agency to continue the management of some of our trout fisheries in eastern Washington with rotenone treatments and trout fry/fingerling plants. It may also allow fairly localized control of species during short duration, high predation events. Many of these actions may require additional public input in the future through the SEPA process before the action is undertaken.
Tammie Johnson	<p>Thank you for allowing SEPA comments on the above subject reference.</p> <p>I approve of this Non-Native Game Fish policy as guidance to WDFW & the Wildlife Commission for the future management of Native & Non-Native fish in the State of Washington. I feel WDFW’s mandated protections & promotions both for Recreationally & Consumptively are being adhered to in this policy. I also feel that protections in this policy would provide best environmental science for native fish species accordingly to their best suited habitat & conditions while at the same time allowing Non-Native best science management in waters that are not best suited for Native species and/or has insignificant adverse effects to non-endangered native gamefish.</p> <p>I am in favor of the WDFW recommended options in the categories noted for Population, Fishing Regulations, Introduction/Supplementation/Translocation, Habitat, & Illegal Introduction, excepting Targeted Control. I am not in favor of Targeted Control unless amended for specific emergency nature when normal timeline management could be an immediate detriment to Native game fish species or similar emergency.</p>	Thank you for your comment. The targeted control section is intended to allow our agency to continue the management of some of our trout fisheries in eastern Washington with rotenone treatments and trout fry/fingerling plants. It may also allow fairly localized control of species during short duration, high predation events. Many of these actions may require additional public input in the future through the SEPA process before the action is undertaken.

<p>Russell Avery</p>	<p>Thank you for allowing SEPA comments on the above subject reference.</p> <p>I approve of this Non-Native Game Fish policy as guidance to WDFW & the Wildlife Commission for the future management of Native & Non-Native fish in the State of Washington. I feel WDFW’s mandated protections & promotions both for Recreationally & Consumptively are being adhered to in this policy. I also feel that protections in this policy would provide best environmental science for native fish species accordingly to their best suited habitat & conditions while at the same time allowing Non-Native best science management in waters that are not best suited for Native species and/or has insignificant adverse effects to non-endangered native gamefish.</p> <p>I am in favor of the WDFW recommended options in the categories noted for Population, Fishing Regulations, Introduction/Supplementation/Translocation, Habitat, & Illegal Introduction, excepting Targeted Control. I am not in favor of Targeted Control unless amended for specific emergency nature when normal timeline management could be an immediate detriment to Native game fish species or similar emergency.</p>	<p>Thank you for your comment. The targeted control section is intended to allow our agency to continue the management of some of our trout fisheries in eastern Washington with rotenone treatments and trout fry/fingerling plants. It may also allow fairly localized control of species during short duration, high predation events. Many of these actions may require additional public input in the future through the SEPA process before the action is undertaken.</p>
<p>Matthew Baerwalde</p>	<p>These comments are submitted on behalf of the Snoqualmie Indian Tribe, a federally recognized sovereign Indian Tribe with its governmental offices at 9571 Ethan Wade Way SE, Snoqualmie, WA 98065 (“Tribe”). The Snoqualmie Indian Tribe [Tribe] is a federally recognized sovereign Indian Tribe and a signatory to the Treaty of Point Elliott of 1855 in which it reserved to itself certain rights and privileges, and ceded certain lands to the United States. As a signatory to the Treaty of Point Elliot, the Tribe specifically reserved to itself, among other things, the right to fish at usual and accustomed areas and the “privilege of hunting and gathering roots and berries on open and unclaimed lands” off-reservation throughout the modern-day state of Washington. Treaty of Point Elliot, art. V, 12 Stat. 928. Thank you for considering these comments on the non-native game fish and fisheries policy.</p> <p>We generally agree with the policy choices as described in this document that emphasize native fisheries, in particular native anadromous and species of concern fisheries, over non-native species and fisheries. The policy, however, lacks any mention of the Department’s obligation to preserve fisheries as related to Tribal Treaty Rights, and how these policies affect the Treaty and indigenous resources that belong to tribal people. We urge WDFW to correct this oversight, and include this important contextual information, which should be a part of the framework by which WDFW approaches all policy and fishery management decisions.</p> <p style="text-align: right;">Thank you for the opportunity to comment.</p>	<p>Thank you for this comment. Meaningful tribal consultation and coordination is an integral component of WDFW's relationship with federally recognized tribes in and adjacent to Washington State. Though it may not be specifically called out in this policy, we are guided by an overarching internal policy that requires staff to consult and coordinate on a government-to-government basis with federally recognized tribal governments when WDFW proposed policies, agreements or program implementation may affect tribal interests. I will reference this internal policy more clearly at the beginning of the document.</p>
<p>Perry Falcone</p>	<p>See attachment 2</p>	<p>Thank you for your comments. This draft policy does not propose any specific actions for any specific waterbody, but provides broad guidance to the type of actions that may be undertaken. Your comments pertain to specific, desired actions which may or may not fall within the guidance of this draft policy.</p>

Jason Mulvihill-Kunz	See attachment 3	Thank you for your comments. This draft policy does not propose any specific actions for any specific waterbody, but provides broad guidance to the type of actions that may be undertaken. Your comments pertain to specific, desired actions which may or may not fall within the guidance of this draft policy.
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Attachment 1

November 12, 202121-054

SEPA comments

Dept of Fish & Wildlife
600 Capitol Way North
Olympia, Wa 98501-1091

Commission email : commission@dfw.wa.gov

WDFW email: Stephen.Caromile@dfw.wa.gov

Proposal: Non-Native Game Fish & Fisheries Policy - Statewide

Ref: DNA 21-054

Attn: SEPA Desk

The **Borderline Bassin Contenders**, a hunting & fishing Club since 1973, would like to make **highlighted** comments below on the above proposal & reference. We are in approval of creating this long-needed policy and feel that this policy will provide guidance to WDFW & the Wildlife Commission for the future management of Native & Non-Native fish in the State of Washington. We feel WDFW mandated protections & promotions both for Recreationally & Consumptively are being adhered to in this policy. We also feel protections would be provided **by best environmental science** for native fish species accordingly to their best suited habitat & conditions while at the same time allowing Non-Native **best science management** in waters that are not best suited for Native species and/or has **insignificant** adverse effects to non-endangered native fish species.

The preferred BBC highlighted options per categories according to **Population, Fishing regulations, Introduction/Supplementation/Translocation, Habitat, Illegal Introduction, & Targeted Control** are as follows:

Population Management Rivers, Streams, and Beaver Ponds

With Native Anadromous Fish

BBC prefers Option A: WDFW will prioritize management of native anadromous fish, and may secondarily manage (actively or passively) for non-native game fish species when their impacts to anadromous fish are directly assessed with best available science, are not significant, and are consistent with anadromous fish management and recovery.

With Native Species of Concern

BBC prefers Option A: WDFW will prioritize management of native species of concern, and may secondarily manage (actively or passively) for non-native game fish species when their impacts to native species of concern are directly assessed with best available science, are not significant, and are consistent with native fish management and recovery.

Without Native Anadromous Fish or Species of Concern

BBC prefers Option A: WDFW may prioritize management of non-native game fish species

Population Management Lakes, Ponds, and Reservoirs

With Native Anadromous Fish

BBC prefers Option B: WDFW will prioritize management of native species of concern and may secondarily manage (actively or passively) for non-native game fish species when their impacts to native species of concern are directly assessed with best available science, are not significant, and are consistent with native fish management and recovery.

With Native Species of Concern

BBC prefers Option B: WDFW will prioritize management of native species of concern and may secondarily manage (actively or passively) for non-native game fish species when their impacts to native species of concern are directly assessed with best available science, are not significant, and are consistent with native fish management and recovery.

With Limited or no Connectivity to anadromous waters, or waters with no anadromy

BBC prefers Option A: WDFW may prioritize management for non-native and/or native game fish species.

Fishing Regulations

Rivers, Streams, and Beaver Ponds

With Native Anadromous Fish

BBC prefers Option A: WDFW may promulgate rules for non-native game fish that reduce impacts to native anadromous fish. This may include changes to daily bag limits, size restrictions and/or seasons. Utilizing best available science, develop rules based on empirical estimates of the effects of proposed rules on native anadromous fish and non-native game fish.

With Native Species of Concern

BBC prefers Option A: WDFW may promulgate rules for non-native game fish that reduce impacts to native species of concern fish. This may include changes to daily bag limits, size restrictions and/or seasons. Utilizing best available science, develop rules based on empirical estimates of the effects of proposed rules on native species of concern and non-native game fish.

Without Native Anadromous Fish or Species of Concern

BBC prefers Option A: WDFW may promulgate rules for non-native game fish that protect native and/or non-native game fish. Develop rules designed to provide quality fishing for native and/or non-native game fish.

Fishing Regulations

Lakes, Ponds, and Reservoirs

With Native Anadromous Fish

BBC prefers Option A: WDFW may promulgate rules for non-native game fish that reduce impacts to native anadromous fish. This may include changes to daily bag limits, size restrictions and/or seasons. Utilizing best available science, develop rules based on empirical estimates of the effects of proposed rules on native anadromous fish and non-native game fish.

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BBC prefers Option A: WDFW may promulgate rules for non-native game fish that reduce impacts to native species of concern. This may include changes to daily bag limits, size restrictions and/or seasons. Utilizing best available science, develop rules based on empirical estimates of the effects of proposed regulations on native species of concern and non-native game fish.

With Limited or no Connectivity to anadromous waters, or waters with no anadromy

BBC prefers Option A: WDFW may promulgate rules for non-native game fish that protect native and/or non-native game fish. Develop rules designed to provide quality fishing for native and/or non-native game fish.

Introduction/Supplementation/Translocation Rivers, Streams, and Beaver Ponds

With Native Anadromous Fish

BBC prefers Option B: WDFW will not introduce, translocate, or supplement non-native game fish.

With Native Species of Concern

BBC prefers Option B: WDFW will not introduce, translocate, or supplement non-native game fish.

Without Native Anadromous Fish or Species of Concern

BBC prefers Option A: WDFW may introduce, translocate, or supplement non-native game fish to create, improve or maintain recreational fishing opportunity, if approved following environmental review (e.g., SEPA, NEPA).

Introduction/Supplementation/Translocation Lakes, Ponds, and Reservoirs

With Native Anadromous Fish

BBC prefers Option A: WDFW may introduce, translocate, or supplement non-native game fish to create, improve or maintain recreational fishing opportunity, if approved following environmental review (e.g., SEPA, NEPA). This would include use of non-native trout species in high lakes, or Tiger Muskie in reservoirs.

With Native Species of Concern

BBC prefers Option A: WDFW may introduce, translocate, or supplement non-native game fish to create, improve or maintain recreational fishing opportunity, if approved following environmental review process (e.g., SEPA, NEPA). This would include use of non-native trout species in high lakes, or Tiger Muskie in reservoirs).

With Limited or no Connectivity to anadromous waters, or waters with no anadromy

BBC prefers Option A: WDFW may introduce, translocate, or supplement non-native game fish to create, improve or maintain recreational fishing opportunity, if approved following environmental review process (e.g., SEPA, NEPA). This would include use of non-native trout species in high lakes, or Tiger Muskie in reservoirs.

Habitat

Rivers, Streams, and Beaver Ponds

With Native Anadromous Fish

BBC prefers Option A: WDFW will provide technical assistance for habitat enhancement or restoration projects that benefit native anadromous fish and/or nonnative game fish. For example, projects like fish passage, or large woody debris placement can increase habitat availability and benefit both native and non-native fish

With Native Species of Concern

BBC prefers Option A: WDFW may provide technical assistance for habitat enhancement or restoration projects to benefit native species of concern and/or nonnative game fish. For example, projects like fish passage, or large woody debris placement can increase habitat availability and benefit both native and non-native fish

Without Native Anadromous Fish or Species of Concern

BBC prefers Option A: WDFW may provide technical assistance for habitat enhancement or restoration projects to benefit game fish. For example, projects like fish

passage, or large woody debris placement can increase habitat availability and benefit both native and non-native fish.

Habitat

Lakes, Ponds, and Reservoirs

With Native Anadromous Fish

BBC prefers Option A: WDFW will provide technical assistance for habitat enhancement or restoration projects that benefit native anadromous fish and/or nonnative game fish. For example, projects like shoreline bulkhead removal and native vegetation planting can provide habitat benefits for both native and non-native fish.

With Native Species of Concern

BBC prefers Option A: WDFW may provide technical assistance for habitat enhancement or restoration projects to benefit native species of concern and/or nonnative game fish. For example, projects like shoreline bulkhead removal and native vegetation planting can provide habitat benefits for both native and non-native fish.

With Limited or no Connectivity to anadromous waters, or waters with no anadromy

BBC prefers Option A: WDFW may provide technical assistance for habitat enhancement or restoration projects to benefit non-native game fish where appropriate. For example, projects like shoreline bulkhead removal and native vegetation planting can provide habitat benefits for both native and nonnative fish.

Illegal Introduction

Rivers, Streams, and Beaver Ponds

With Native Anadromous Fish

BBC prefers Option B: WDFW may actively or passively manage illegally introduced nonnative game fish to remove them or control their expansion. For example, actions to control expansion of introduced fish could be, netting, electrofishing, chemical, or other active or passive removal techniques.

With Native Species of Concern

BBC prefers Option B: WDFW may actively or passively manage illegally introduced nonnative game fish to remove them or control their expansion. For example, actions to control expansion of introduced fish could be, netting, electrofishing, chemical, or other active or passive removal techniques.

Without Native Anadromous Fish or Species of Concern

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Illegal Introduction

Lakes, Ponds, and Reservoirs

With Native Anadromous Fish

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Targeted Control

Rivers, Streams, and Beaver Ponds

With Native Anadromous Fish

With Native Species of Concern

Without Native Anadromous Fish or Species of Concern

Lakes, Ponds, and Reservoirs

With Native Anadromous Fish

With Native Species of Concern

With Limited or no Connectivity to anadromous waters, or waters with no anadromy

The BBC is not in favor of Option A for any of the above situations of targeted control and feel that Option A language would supersede all negotiated options from the whole policy above, the BBC would offer replacement option as follows:

New Option For all above Targeted Control areas: WDFW may perform localized control of non-native game fish where appropriate to meet conservation and/or fish management objectives **specific to an emergency nature** that could not be handled in a normal timeline manner.

For example, actions for localized control could be techniques like netting, electrofishing, chemical, incentivized fisheries, or other active removal techniques to stop an **immediate contamination** from a **not recognized species not native** to northern/central part of the North American continent and/or by where such emergency similar to and or like a dam breaching by causes not planned and those fish contaminating downstream waters and/or irrigation feeding canals.

Thank you for allowing SEPA comments. The BBC appreciates WDFW & Wildlife Commission for work & efforts to bring the Non-native gamefish policy forward.

Sincerely,

Bob Harriman, legislative liaison

Borderline Bassin Contenders

2284 E Hemmi rd

Bellingham, Wa 98226

Cell or Text Ph 360-927-0967

Email bob.harriman@icloud.com

cc: clb pres, bd of dirs,
wdfw – Steve Caromile

Attachment 2



November 17, 2021

Larry Carpenter, Chair
Washington Fish and Wildlife Commission
PO Box 43200
Olympia, WA 98504-3200

RE: Proposed Non-Native Game Fish and Fisheries Policy

Dear Chair Carpenter:

Thank you for the opportunity to provide comments on the proposed Non-Native Game Fish and Fisheries Policy. The Lake Sammamish Kokanee Work Group (KWG) strongly urges the Washington Department of Fish and Wildlife (WDFW) and the Washington Fish and Wildlife Commission (Commission) to actively evaluate and manage the adverse impacts of non-native fish on our native kokanee and all other native salmon species. Native salmon conservation is the focus of enormous financial and social investments. These investments are also important to Washington's economy, environmental health, recreational fishing, tribal culture and treaty rights, and our regional identity.

The KWG (see attached member list) is a community partnership of elected officials, watershed residents, natural resource management agencies, and non-governmental conservation organizations focused on recovering the once-robust native kokanee salmon population in the Lake Sammamish Watershed. Our goal is to recover our native Lake Sammamish kokanee population to healthy conditions such that it supports a renewed, consistent, and sustainable kokanee fishery on Lake Sammamish. The group has been working together since 2007 to restore habitat, improve water quality, protect land and bolster the native kokanee population. We appreciate WDFW's commitment to kokanee recovery including kokanee supplementation work at the Issaquah State Hatchery, assistance with kokanee spawning surveys and genetic analysis, and a new pilot project in Lake Sammamish to test the performance of Merwin Traps for managing non-native yellow perch.

Recent studies indicate that non-native fish are having an adverse impact on salmon in Lake Sammamish. In 2019, King County and the KWG completed the Lake Sammamish Fish Assemblage and Disease Study. The study showed that 76% of the fish captured in Lake Sammamish (using only 1 to 3-1/2 inch size limited gear) were non-native species, most of which have been documented preying on salmonids. Yellow perch made up 66% of the non-native fish captured in the 2019 study. There were also new non-native species captured that had not been observed in an earlier study including: rock bass, largemouth bass and bluegill. Additional fish surveys in 2021 utilizing underwater diver transects also confirm the enormously disproportionate abundance of non-native fish in the lake. This current condition is concerning and, unfortunately, the adverse impacts of non-native fish will likely get worse in the future, especially if no new action is taken. Climate change is increasing the geographic ranges and feeding activity of these warm water fish. Left unaddressed, predation rates of native salmon species will likely increase.

Lake Sammamish kokanee salmon are currently critically depressed with fewer than 300 adults returning to spawn in area creeks each of the last 5 years. High predation of juvenile fish and grazing competition by non-native fish are expected to be chronic population stressors to our kokanee salmon. The situation has become so dire that the KWG and partners have implemented expansive emergency actions, including a captive broodstock program, cryobanking of male gametes, remote stream egg boxes, experimental fry rearing strategies, and continued integrated supplementation efforts. The KWG and partners are also



investing millions of dollars on water quality improvements, culvert replacements, stream restoration, and invasive aquatic weed control in the Lake Sammamish.

We have several recommendations to improve and enhance the WDFW policy, including:

- Conduct studies to pinpoint when and where non-native predators are causing the greatest mortality to native salmon fry and smolt.
- Develop specific zones where management of non-native fish is a priority to complement the other work being done to recover kokanee salmon and federally listed salmon species.
- Prioritize work with tribes and other partners to manage non-native fish and monitor the results in Lake Sammamish.
- Reverse habitat alterations that support non-native fish populations, such as the proliferation of invasive non-native aquatic weeds (e.g. Eurasian watermilfoil and Brazilian elodea).

We appreciate the Commission's engagement and leadership on these important issues and hope the new Non-Native Game Fish and Fisheries Policy can substantively and positively address these community interests. Please ensure this policy significantly reduces predation rates by non-native fish on native kokanee and all salmon in the Lake Sammamish Watershed. If you have any questions about the KWG or the comments highlighted in this letter, please contact me at 206-477-4689 or perry.falcone@kingcounty.gov.

Sincerely,

Perry Falcone, Kokanee Recovery Manager
On Behalf of the Lake Sammamish Kokanee Work Group

Current representative list of entities active in the Kokanee Work Group:

City of Bellevue
City of Issaquah
City of Sammamish
City of Redmond
Snoqualmie Tribe
Trout Unlimited
Friends of Lake Sammamish State Park
Save Lake Sammamish
Friends of Pine Lake
Friends of the Issaquah Salmon Hatchery
Mountains to Sound Greenway Trust
Mid-Sound Fisheries Enhancement Group
University of Washington, Bothell
Washington State Parks and Recreation Commission
Washington Department of Fish and Wildlife
Washington Department of Ecology
US Fish and Wildlife Service
King County
Watershed residents

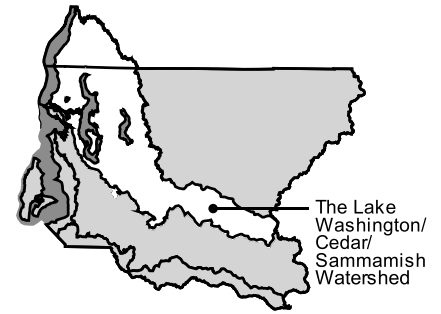
Attachment 3

WATER RESOURCE INVENTORY AREA (WRIA 8) SALMON RECOVERY COUNCIL



November 19, 2021

Larry Carpenter, Chair
Washington Fish and Wildlife Commission
PO Box 43200
Olympia, WA 98504-3200



Beaux Arts Village
Bellevue
Bothell
Clyde Hill
Edmonds
Hunts Point
Issaquah
Kenmore
Kent
King County
Kirkland
Lake Forest Park
Maple Valley
Medina
Mercer Island
Mill Creek
Mountlake Terrace
Mukilteo
Newcastle
Redmond
Renton
Sammamish
Seattle
Shoreline
Snohomish County
Woodinville
Woodway
Yarrow Point

Alderwood Water and
Wastewater District
The Boeing Company
Cedar River Council
Forterra
Friends of the Issaquah
Salmon Hatchery
Mid-Sound Fisheries
Enhancement Group
Mountains to Sound
Greenway Trust
National Oceanic and
Atmospheric Administration
Sno-King Watershed Council
Trout Unlimited
US Army Corps of Engineers
Washington Departments:
Ecology
Fish and Wildlife
Natural Resources
Washington Association of
Sewer and Water Districts
Washington Policy Center
Water Tenders

Dear Chair Carpenter,

Thank you for the opportunity to comment on the proposed Non-Native Game Fish and Fisheries Policy options being considered by the Washington Fish and Wildlife Commission (Commission). We appreciate the Commission's leadership in establishing policies to guide management and protection of the state's valuable fish and wildlife resources. On behalf of the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Salmon Recovery Council, we are writing to strongly support the Commission establishing a non-native game fish management policy that prioritizes protection, conservation, and recovery of the state's native salmon species, especially in areas with ESA-listed and at-risk populations.

The WRIA 8 Salmon Recovery Council is a regional partnership between 28 local governments and stakeholder representatives from community groups, business, citizens and state and federal agency partners – including WDFW – working collaboratively to recover Chinook salmon. Although Chinook salmon are our primary focus, many of our objectives are intended to benefit other salmonids, including sockeye, kokanee, and coho. The WRIA 8 Chinook Salmon Conservation Plan (WRIA 8 Plan) was approved and ratified in 2005 by elected officials from 28 local governments, was approved by NOAA in 2007 as a component of the Puget Sound Salmon Recovery Plan and was updated and approved again by local government partners in 2017. The WRIA 8 Plan guides investment of millions of dollars in annual grant funding for salmon habitat protection and restoration, and identifies the factors limiting Chinook recovery and survival in the watershed.

The WRIA 8 Plan identifies predation by non-native predatory fish as a primary limiting factor for salmon recovery. Monitoring studies in WRIA 8 suggest a primary bottleneck to salmon productivity is occurring as juvenile salmonids journey from their natal streams through Lake Sammamish and Lake Washington and the Lake Washington Ship Canal (LWSC) to the Ballard Locks. For example, PIT tag data from 60,972 juvenile Chinook migrating out the Cedar River and Bear Creek systems over the past 20 years (2000-2019) show an average detection rate of just 17% at the Ballard Locks. Over the past 5 years, the average detection rate has declined to 9 and 11% of juveniles from the Cedar River and Bear Creek, respectively. While available data indicate predation is a problem for salmon productivity in the watershed, more work is needed to better understand the

impact of predation on juvenile salmonids, which species have the greatest impact, the role of habitat change and human activities in exacerbating predation impacts, and where predation hot spots exist. WRIA 8 is investing funds and partnering with the Co-Managers, U.S. Fish and Wildlife Service, and others to do targeted predation monitoring and assessment work, which is intended to inform and support active management actions.

In addition to prioritizing protection of native salmon species, we suggest the non-native game fish policy should direct WDFW to:

- Conduct studies to pinpoint where non-native predatory fish impacts on juvenile salmonids is having the greatest impact.
- Establish specific areas where management of non-native predatory fish is a priority to complement the other work being done to recover native species and especially those federally listed.
- Prioritize work with tribes and other partners to manage non-native predatory fish and monitor the results to inform management actions.
- Evaluate effectiveness of modifying habitat that supports non-native predatory fish populations.

With WDFW and other partners at the local, regional, and state levels increasing staffing and funding resources focused on Puget Sound Chinook recovery, it is important to establish a non-native game fish management policy that prioritizes protection and recovery of native salmonids. We urge the Commission to approve a non-native game fish policy that prioritizes protection and recovery of native anadromous fish, especially ESA-listed and at-risk salmonid populations, and supports monitoring and assessment efforts to better understand predation impacts and approaches for most effectively reducing non-native predatory fish populations.

Thank you for considering these comments in the Commission's deliberations on the non-native game policy. If you have any questions about these comments or about salmon recovery in WRIA 8, please contact Jason Mulvihill-Kuntz, the WRIA 8 Salmon Recovery Manager, at 206-477-4780 or jason.mulvihill-kuntz@kingcounty.gov.

Sincerely,



John Stokes
Chair, WRIA 8 Salmon Recovery Council
Councilmember, City of Bellevue



Mark Phillips
Vice-Chair, WRIA 8 Salmon Recovery Council
Councilmember, City of Lake Forest Park

Cc: Kelly Susewind, Director, Washington Department of Fish and Wildlife
Jim Scott, Washington Department of Fish and Wildlife
David Troutt, Chair, Puget Sound Salmon Recovery Council
WRIA 8 Salmon Recovery Council members
Lake Sammamish Kokanee Work Group