

**6 February 2014**

**Summary of public comment regarding draft Grays Harbor Salmon Management Policy.  
Second round**

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Included below are excerpts from written comment received between January 15 – 31, 2014. Comments have not been edited for content or to correct spelling, grammar, or punctuation.

Comments were summarized into thirteen (13) categories including: Reduce/Eliminate Fishery Impacts (42), Language (33), Allocation (27), Conservation (22), Economic value (22), Accountability (19), Sound Science (13), Gear Conflict (5), Grays Harbor Control Zone (5), Hatchery production (4), Habitat (1), Marine mammals (1), Nutrient Enhancement (1)

Categories are collated by major reason for which the policy is needed (Enhance Conservation Focus, Restore and Maintain Public Trust, and Clarify Sharing of Impacts), followed by a section with remaining categories.

**Category (#) • Full Comment**

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**Reduce/Eliminate Fishery impacts**

- I'm a proponent of banning ALL GILLNETS
- The only logical way to improve fish runs is to get rid of gill nets especially in the bottleneck area
- There should be a total ban on commercial. gillnets in areas designated as freshwater to remain consistent with policies adopted for the Columbia River and Puget Sound. I believe the residents of our state have overwhelmingly shown their support for this direction as demonstrated in the sheer volume of public testimony shown.
- Example; if in 2014 the Wynoochee river is not expected to meet Chinook escapement goals....then there should be no directed Chinook fishery in area 2B,2D,&2A....
- In the event of low Chinook returns- No recreational fishing above Cosmopolis boat launch.
- The Satsop River should be closed above the mouth of the West Fork from September 1 to November 1 to protect wild Chinook spawners.
- To help rebuild Chinook runs spawning areas should be closed to boats and sport fishing until fry emerge from the gravel.
- The Wynoochee and Satsop rivers should be protected as spawning ground. Recreational fishers pose a significant threat to spawning salmon and their eggs.
- The Wynoochee River should be closed from September 1 to November 30 to protect wild Chinook and wild Coho.
- Area 2C could be open for a directed Chinook Fishery if the Humptulips system would exceed escapement goals.
- Removing the Gill Nets from are 2A
- I also believe that closing area 2A in the Chehalis River if not this year but next year would have two important results. Public testimony by non-native commercial fishermen to this issue has stated that the tribe WILL NOT fish that area on the same days as commercial gillnetters. This means that a 4 days in and 3 days out will not be considered by the tribe in this area which means ALL of Grey's Harbor will not have 4 days in and 3 days out by all gillnetters. The river is also very narrow in this area and numerous gillnets will defeat recovery actions taken.

### **Reduce/Eliminate Fishery impacts (cont.)**

- This is an improvement in the conservation goal of this resource. A greater improvement would be to make area 2A off limits to all WFDW-managed commercial fisheries.
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- Area 2C should not be opened for sport fishing. In 2013 our entire net quota for the Chehalis would have been harvested there. If 2C was opened for chinook retention and the Chehalis for non-retention enforcement would be impossible.
- If predicted escapement levels are not to be met then no one should fish prior to October 10th when Chinook have cleared the system. This policy is being pushed forward to fast. It has no cap for the recreational fishery for the Humptulips side and offers too much for the recreational fishery for the Chehalis. To allow any recreational fishery where there are no hatchery Chinook would be detrimental to our conservation objective. The Wynoochee would be a classic example. Rivers such as these should not have any fishery until Chinook have passed after through the system before Oct. 20.
- extremely close monitoring of any coho directed fishery. A coho directed fishery should not occur until November 1, in order to ensure the safety of the Chinook.
- Marine area 2.2 should not be opened for chinook retention until healthy and abundant wild and hatchery runs rebuild. It should not open before Oct. 1 for non-retention. A retention season should have a minimum of 2000 harvestable non-treaty share chinook before opening. Freshwater areas should not open with less than 1000 non-treaty share.
- No sport fishing in area 2.2 before October 1 if Chehalis Chinook are non-retention,
- The marine area 2.2 should not open for retention of Chinook or non-retention during a coho fishery before Oct. 1st. until healthy and abundant wild and hatchery Chinook runs rebuild.
- The 2.2 area should not have a retention for Chinook unless there is at least 2000 harvest able non-treaty share. Fresh water retention after at least 1000 non-treaty share.
- No Chinook sport fishing in area 2C if all of 2.2 is open for non-retention of wild Chehalis Chinook. (This would cause inforcement issues.)
- The sport limit for Chinook should be 1 whether wild or hatchery no matter the size of the run.
- No retention of hatchery Chehalis Chinook if there is non-retention of wild Chehalis Chinook. (This will save Wild Chinook by the sports not trying to catch hatchery fish).
- To build chinook runs spawning areas for wild chinook should be closed for sport fishing and boats until fry emerges from the gravel.
- Whether it be isolation of spawning grounds, regulations on jet boats, decreased catch limit, or limited entry, there must be concessions made on both sides- not continually on the part of the commercial gillnetters alone.
- For the past quarter if the century, the burden if conservation, of our wild Salmon stocks has fallen on the backs of the recreational fishers of Washington. With single point barbless hooks, wild fish release, species specific, non buoyant lures restrictions, bait prohibited, not removing fish to be released from the water, knotless nets, daylight hours fishing only, when other species are open to fishing at night i. e. trout, and steelhead. Bubble fisheries areas closed certain times during the salmon returns. And other regulations, all supported by the commission.
- WDFW has placed very few restrictions on Grays Harbor, and the Chehalis River commercial fishers. They continue to fish in historic fashion with mortalities ranging in the 50% range, on weak stocks of concern. This fishery is one of the reasons we cannot reach rebuilding of critical stocks. There is an uncertainty of exactly what percentage of these released stocks are actually killed. With live boxes that are not utilized to the requirements of said fishery.
- alternate nets that will allow release of wild fish unharmed
- Page 6, Chum Salmon, item 2: This provision precludes the establishment of a species selective commercial chum salmon fishery, when there are concerns with coho and Chinook escapements. A properly conducted seine fishery could be conducted with little if any impact on the stocks of concern.

### **Reduce/Eliminate Fishery impacts (cont.)**

- While I understand that Chinook salmon runs are low and concerns are high, I do not believe that allocating more fish to the sportsmen will do anything to further conservation efforts. With the introduction of live boxes and net changes, gillnetters have adapted and have seen decreased mortality. We would like to see similar efforts made on the part of the sportsmen.
- Page 5, Fall Chinook Salmon, item 2c: Achieving hatchery reform goals (included in the policy) could be facilitated by a limited selective beach seine fishery on Humptulips hatchery fish. The draft appears to preclude this option.
- Will tangle nets replace gillnets?
- gill nets in general are a poor way to harvest our fish when select harvest is so critical
- Mark selective fisheries should be used all the time. Will tangle nets replace gillnets?
- How does the state of Washington get Alaska to stop harvesting 32% of Washington bound fish?
- Item 13: "Increasing hatchery production" is most often interpreted as releasing more fish but as of now, the vast majority of the catch of Grays Harbor Chinook, and to a lesser degree coho, occurs north of the border. Considering only contributions to the Washington catch, some may question the economic justification for releasing more fish under existing conditions. "Increasing adult salmon returns of hatchery and wild fish to Grays Harbor" is the real goal and includes various courses action including hatcheries, new techniques, adjustments in the Pacific Salmon Treaty, and many other options as well.
- I also feel that more input to the Pacific Salmon Commission is needed as to the serious state of the runs in Grey's Harbor. If a more valid scientific study is needed instead of current means of measuring run size then those studies should be implemented. Alaska harvests of our fish are esp. damaging, the state of Alaska stocks should be an example of how NOT to manage a resource.
- 48% of chinook are harvested outside WDFW controlled waters. Without limiting prior interception runs will be impossible to build. For every 3 chinook we increase the run size only 1 will return to the harbor for harvest, 1 for prior interception, and 1 for escapement.
- The 48% prior harvest rate outside of state managed waters needs to be addressed. Chinook runs will be impossible to rebuild.
- Right now we have no limit on the number of recreational guides there can be in Grays Harbor how is this even close to being fair for these guides to take the fish from my quota so that they can make a bigger living than they already do. The guides are just as much commercial fisherman as I am

### **Language**

- I do not understand the logic of a trigger of inadequate spawning escapement in 3 out of 5 years . With so many struggling wild salmon populations this does not seem to be erring on the side of the resource.
- Guiding Principles, item 8: The intent of the "three consecutive days" per week provision is unclear. It appears that as written it could be satisfied with a weekly three day closure in any one of the four management areas. Hopefully, the intent of the provision is a simultaneous weekly three day closure throughout Grays Harbor.
- The language "adult return" should more clearly reflect the terminal number of adults forecast to enter Grays Harbor after pre-terminal ocean harvest.
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- In the section titled Guiding Principles para1): "...*Regional Fishery Enhancement Groups and Lead Entities...*" Who are the Lead Entities? Should these 'Entities' be defined to provide transparency to the general public?
- Page 6, Chum Salmon, item 3. Again the opening line appears to indicate it will establish catch shares between state managed commercial and recreational fisheries. What follows only applies to the recreational catch.

## Language (cont.)

- In the section titled Guiding Principles para6): " ...both *Quinault Indian Nation and nontreaty fisheries...*" Who are the nontreaty fisheries in reference? I assume they mean the nontreaty recreational and commercial fisheries but does this also include the Chehalis Tribal fishery? Many people are not aware that the Chehalis Tribal fishery is not actually a treaty fishery, but a component of the nontreaty fishery. I believe that this should be made very clear to the public at-large.
- In area 2C Humptulips the 1.20% fall Chinook impacts also needs to be changed to a minimum of 1.2%.
- Guiding Principles, #8: What does this really mean? Is Area 2A a "fishing area"? So, for example, no fishing in any one of the Areas for three consecutive days would meet this criteria, while fishing could continue in all the other areas these same three days. Is that what you intend? I don't think that's the intent, but without better wording, I believe it could be interpreted this way. Why, "if possible"? If it's not required, then I don't believe it's going to happen. What do you think would make this impossible?
- Page 5, Coho Salmon, item 2: The opening line appears to indicate it will establish catch shares between state managed commercial and recreational fisheries. What follows only applies to the recreational catch, and in doing so, does not define "large" and "small" run sizes.
- Page 3, Item 10: Appears wordy/confusing - suggest: "If it becomes apparent that a scheduled fishery will put at risk the attainment of conservation objectives, the Department shall implement in season management actions to attain the conservation objectives and impact sharing in the preseason fishery plan."
- The starting year for the guideline of making the goal in 3 out of the last 5 years is actually 2009, not 2008.
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- Recommendation #5 - Our concern is that fishing in all Areas unavoidably results in encounters with BOTH Chehalis-origin Chinook and Humptulips-origin Chinook, especially area 2C. This recommendation as written opens the door to unwittingly exploit a significant portion of Chehalis-origin fish as managers seek to maximize opportunity under the 1.2% cap for Humptulips. Because of co-mingling, there is potential for over-exploiting Chehalis. While unlikely, the reverse is also conceivably possible when WDFW seeks to maximize opportunity under the 0.8% cap for Chehalis fall Chinook in Area 2A/2B/2D. Areas 2A, 2B, 2C, and 2D combined shall have an impact rate of less than 0.8% on natural-origin Chehalis fall Chinook and less than 1.2% on natural-origin Humptulips fall Chinook.
- Fall Chinook Salmon, #3a: Why only Areas 2A, 2B, and 2D? According to Coded Wire Tag data, about 10.6% of the Chehalis Fall Chinook are captured in Area 2C. If the concern is the escapement of Chehalis wild Chinook, it seems this ten percent should be covered as well. If it is not included, what is the reason for no impact limit on approximately 1,500 wild Chinook (based on the Chehalis wild Chinook run size of 15,132 for 2013)?
- Recommendation #5 - Our concern is that fishing in all Areas unavoidably results in encounters with BOTH Chehalis-origin Chinook and Humptulips-origin Chinook, especially area 2C. This recommendation as written opens the door to unwittingly exploit a significant portion of Chehalis-origin fish as managers seek to maximize opportunity under the 1.2% cap for Humptulips. Because of co-mingling, there is potential for over-exploiting Chehalis. While unlikely, the reverse is also conceivably possible when WDFW seeks to maximize opportunity under the 0.8% cap for Chehalis fall Chinook in Area 2A/2B/2D. Areas 2A, 2B, 2C, and 2D combined shall have an impact rate of less than 0.8% on natural-origin Chehalis fall Chinook and less than 1.2% on natural-origin Humptulips fall Chinook.
- Can we use a better word? Adequate is not strong enough.
- I am very concerned about the words: "if possible".
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## Language (cont.)

- Recommendation #3 - Our major concern here is the language “if possible”. We would hope that the Commission agrees with our interpretation that the only time it is “NOT possible” is when the Quinault Indian Nation unilaterally conducts gillnet fisheries more than 4 days per week in either fishing area (aggregate Area 2A/2B/2D or Area 2C). Under all other circumstances, it is most certainly “possible” to achieve this objective. For clarity, we propose the following modification:
- Guiding principle 8 it is proposed that WDFW managed commercial gillnet fisheries in a fishing area or aggregate area (i.e. area 2A,2B,2D; area 2C) shall be scheduled (IF POSSIBLE?), so that in any given calendar week there are a minimum of three consecutive days when no treaty or state managed fisheries shall occur." I have fished in Willapa Bay two and three days after the nets have come out and found that the bays was swept clean of salmon. One day we did not mark a single fish.
- Clarification of the “4/3” commercial non-treaty net limitation would prove extremely helpful to many of citizens involved in this process. We endorse the suggestion developed by rec representatives of the GH Advisory Group (red text) as follows: WDFW-managed commercial gillnet fisheries in a fishing area or aggregate area (i.e., Area 2A/2B/2D, or Area 2C) shall be scheduled, if possible, so that in any given calendar week there are a minimum of three consecutive days when no treaty or state-managed commercial fisheries occur. If the treaty fishery occurs 4 or more days in a calendar week, no state-managed commercial fishery shall occur in the remaining days of that calendar week.
- we can and should clearly without any ambiguity restrict the state managed commercial gill net fisheries.
- Remove the word when from the section on MSF’s and require the use of MSF’s
- Recommendation #4 - Our concern is that the language “incidental harvest” does not truly reflect that these fish are NOT intended to be harvested at all, but instead to be used as release mortality impacts to access other harvestable salmon stocks in Grays Harbor. For clarity, we strongly urge the following modification: c) limit commercial fishery impacts to the incidental harvest release mortality of natural-origin fall Chinook during fisheries directed at other species.
- Fall Chinook Salmon, #1: Please recognize that the term, “natural-origin” includes hatchery fish. This means that hatchery fish are counted toward the escapement goal for “wild fish”. I don’t really have a problem with this as long as, according to WDFW, that the poorer spawning capability of hatchery fish in the wild environment is recognized. Thus, to count towards a wild fish escapement goal, it would take more hatchery fish than a simple 1:1 ratio. If “natural-origin” spawners are used against the goal, why isn’t the goal set as a total for both hatchery and wild fish? Is it just to make the numbers look better?
- Recommendation #4 - Our concern is that the language “incidental harvest” does not truly reflect that these fish are NOT intended to be harvested at all, but instead to be used as release mortality impacts to access other harvestable salmon stocks in Grays Harbor. For clarity, we strongly urge the following modification: c) limit commercial fishery impacts to the incidental harvest release mortality of natural-origin fall Chinook during fisheries directed at other species.
- the language for the 4 days in and 3 days out. The language allows for changing the intent of 4 days in and 3 days out by saying “when possible”.
- It would prove valuable to have a glossary of terms attached so that the public and the Department both clearly understand the directions within the policy given the Department by the Commission. If time restraints are a problem, perhaps a glossary could be added at a later date. Preferably, prior to the final adoption of the 2014 seasons.

## Allocation

- Commercial fishing throughout the state provides a source of high quality sea food for the non-fishing consumers that are tax payers that help support WDFW’s budget and hatcheries throughout the state. Local businesses and processors will also suffer monetary losses if this fishery is lost.

## Allocation (cont.)

- I would like to comment on some of the myths the sport community likes to state as fact in their testimonies. Gillnets are "curtains of death" that are non-selective and decimate runs and catch everything swimming near them. By regulation of time of day, depth, size of mesh, area fished, and length of drift, gillnets can avoid much of the by-catch. In 2013 during our tangle net fishery our chinook encounters were 61 observed by WDFW on 200 drifts, and were estimated at 69 for the period. That same week the Tribal fishery harvested approximately 300 chinook per day with no restriction on their coho nets, area, or time of day (24hrs per day). They have stated we fish bank to bank and block off the entire channel. This is false because of the pilings, snags, and other debris along area 2D and 2A. The Tribe harvests a large share of their catch in setnets on the edges we can't fish. Another myth is that thousands of dollars are spent on monitoring the net fishery. Region 5 has to predict run size, estimate escapement, monitor catches of both commercial and sport fishers and coordinate activities required for PFMC predictions that effect sport and commercial fisheries statewide in the ocean and in the coastal bays and rivers along the coast, and are co-managers with the Tribes on the coast.
- To the sport fishers who testify that a gillnet is a non-selective "curtain of death," I would like to ask where their information comes from? Is this based on science and fact or pure speculation? I would encourage our fisheries to rely on scientific evidence and ensure there agency is staffed with biologists who have degrees and experience in this field of study. Being swayed due to the amount of pressure being employed by a group such as the sport fishers is no way to run a fishery in my opinion. The tribal fishery caught 300 Chinook *per* day and the non-tribal fishery had less than 200 in 7 days. Is it correct the tribal fishery is allowed to fish 24 hours per day for a longer period of time and without the required use of a recovery fish box to help protect the wild Chinook population?
- I have fished commercially for 27 yrs. and request that ALL fisherman (sport/commercial) receive equal time in 2014 and beyond. Sport fishermen in Grays Harbor County have become almost rabid in trying to restrict commercial fishing and border on harassment. They think only of themselves. How would non-fishermen obtain any fish without us? As to the alleged "curtain of death", tribal fishermen during the 2013 tangle net fishery caught 300 Chinook per day while we caught only 200 in 7 days. They have no restrictions and can fish 24 hrs. per day; I understand treaties and federal regulations allow them these rights, but it would help if they too would make an effort to protect and restore our natural resources.
- I would like to see this sports fishery protected and enhanced. I would like to be given a responsible opportunity to fish this fishery in the fall for Chinook and silver salmon combined with the opportunity to retain fish.
- In the Catch Sharing section: I was out-of-state for that survey. Here are my recommendations: 3)b) Chehalis Fall Chinook, Run Size Small: FW 65%/SW 35%; Chehalis Fall Coho, Run Size Small: FW 70%/SW 30%. This may provide some relief for an area 2B/2d recreational fishery given the adoption of the 4/3 net schedule which should allow more chinook and coho upriver. 3)c) Humptulips Fall Chinook, , Run Size Small: FW 65%/SW 35%; , Run Size Large: FW 60%/SW40%; Humptulips Fall Coho, , Run Size Small: FW 75%/SW 25%. This will provide for the potential of developing a SW rec boat fishery in area 2C given the potential constraints that will be implemented in Areas 2B/D .
- This plan goes way beyond Sport priority for the Chinook to exclusive priority! With a healthy and abundant wild and hatchery runs we need a trigger number that would allow the non-treaty net fishery to keep Chinook during coho or chum fisheries.
- The non tribal gillnet fleet should be allowed 90% of Chinook salmon impacts for the Humptulips River.
- With a limit of 0.8% on the chehalis in areas 2A,2B,2D That will not give the commercials a meaningful coho or chum fishery. The percentage should be a guaranteed 2% of the chinook crossing the bar for Chehalis bound fish. It would take in the neighborhood of 300 chinook to harvest a meaningful catch of coho and chum.
- In area 2C there is an abundant healthy and strong run of both wild and hatchery chinook. These fish should be divided evenly between sport and commercial fishers.

## Allocation (cont.)

- I, \_\_\_\_\_ as a taxpayer of the state of Washington and consumer of wild caught salmon, support the Grays Harbor non tribal gillnet fishery. I believe that the salmon should be equally split between the commercial and the sport fishery, not sport priority on fall chinook!
- supports the Grays Harbor Gillnetters
- The commercial fleet deserves their fair share of the resource.
- If the commission decides to allocate most of the Chehalis Chinook impacts to the recreational fishery, then the non tribal gillnet fleet should be awarded area 2C.
- As a taxpayer of the State of Washington and consumers of wild caught salmon, I support the Grays Harbor non-tribal gillnet fishery. I believe that the salmon should be equally split between the commercial and the sports fishery, not the sport priority on fall Chinook.
- We are supposed to share with each other. Putting the GH gillnetters off the water will not stop gillnetting, you still have the tribes and you will be giving them our share of the fish!
- As a taxpayer of the state of Washington and consumers of wild caught salmon, I support the Grays Harbor non tribal gillnet fishery. I believe that the salmon should be equally split between the commercial and the sports fishery, not sport priority on fall Chinook
- We, the gillnetters have for all intents and purposes have been the only user group in Grays Harbor that have been in a conservation mode to assure that we had a minimal impact on Chehalis Chinook. We have utilized our chinook impacts to maximize our harvest of coho and chum salmon. We are harvesting food fish for the citizens of the state of Washington of which 99% do not fish for salmon! In order to have a viable non-treaty commercial fishery we need to be allowed 2% impacts on Chehalis Chinook.
- Believe the net fishery should be allowed if the stocks allow, I also believe the net fishery should retain chinook because the tribe is keeping them, and believe that the net fishermen should get fishing time on the Humpulips River, if fish are there!
- With healthy and abundant wild and hatchery chinook runs there should be a trigger number that the net fishery should be able to retain the chinook encounters during coho and chum harvest.
- With healthy and abundant wild and hatchery runs we need a trigger number that would allow the non-treaty fishery to keep the chinook encountered in our coho fishery in the Chehalis. This needs to be addressed in the plan.
- On the years that do have healthy and abundant wild and hatchery fall chinook the non tribal gillnet fishery should be allowed a 50/50 split of harvestable Chinook with the sport fishery.
- Right now we have a marine area 2.2 sport fishery and a fresh water sport fishery in Grays Harbor the State cannot keep using the commercial fisheries share of the fish to fuel both of these fisheries. They should be considered one user group and divided however they want
- I would like to stress my objection to any regulation changes that might be imposed that could significantly change the gear required to operate in the Grays Harbor fishery basin. Please keep in mind any significant changes or reductions in shares would have a significant fiscal impact on the gillnetter's involved. These are hard working people with limited financial resources who are trying to provide for their families and do not have the extra funds required to keep up with any such mandated changes. I believe that any changes that would cause negative economic hardship to this group requires some type of compensation.
- The plan goes beyond sport priority. They are moving to an exclusive fishery on chinook. The average chinook run on the Humpulips the last few years is approximately 3500 wild and hatchery fish. At 1.2% this is 42 fish. What sort of fishery would this support? Coho are extremely hard to catch in this area where we are able to fish. That turns the 2C area fishery into an exclusive sport fishery. Where is the mandate to maintain a commercial fishery in this plan?
- Over the last few years there has been tens of thousands of unharvested coho in the Chehalis system. These fish need to be harvested.

## Conservation

- Concerning recommendation 2, since there has only been 1 year of adequate escapement out of the last five, 2014 impacts will be less than 5% of the run. In 2013 we found the sport fishery in marine area 2.2 harvested over 1100 chinook in a one week fishery. Under this scenario, it will take a run size of 22000 to have one week of harvest in area 2.2. Since this is unlikely, there will be no retention in 2.2 until the 3 out of 5 requirement is made. That will leave extra chinook for the Treaty fishery to harvest. By court decision they could harvest the remaining non-treaty share in their coho fishery.
- Recommendation #1 - Our biggest concern is the omission of chum salmon in this language. If the omission of chum is intentional, we must ask, "Why?" If the conservation principle for distinguishing unique natural-origin spawner goals for Chehalis and Humptulips were truly beneficial for Chinook and coho, should it not also apply to the basin's depressed wild chum populations? We strongly believe it should.

A comprehensive review of chum spawner goals is specifically required in the Adaptive Management section and the specified 2015 review would be the ideal time to develop distinct wild chum spawner goals for BOTH Humptulips and Chehalis. We propose adding the following language:

The Department shall seek agreement with the Quinault Indian Nation to manage fisheries with the intent of meeting the distinct natural-origin Chinook and coho salmon spawner goals for the Humptulips River and the distinct natural-origin Chinook and coho spawner goals for the Chehalis River. The Department shall also seek similar agreement to meet distinct natural-origin chum spawner goals for the Humptulips River and the Chehalis River no later than the 2016 NOF process.

- The entire chum salmon run needs to be better addressed. It should be presented in the same manner as the Chinook and Coho, breaking it up into Chehalis Chum, and Humptulips Chum. The chum run has its own individual issues on each river system and should be addressed as such protecting the resource.
- My last point has to do with determining chum runs by lumping them all together in Grey's Harbor. The scientific absurdity of this should be apparent to all. With these runs missing escapement as many years as they have (although we don't have the data to show how really bad it is!) it is obvious that changes in scientific data collecting are needed.
- chum salmon run needs to be better addressed
- Recommendation #1 - Our biggest concern is the omission of chum salmon in this language. If the omission of chum is intentional, we must ask, "Why?" If the conservation principle for distinguishing unique natural-origin spawner goals for Chehalis and Humptulips were truly beneficial for Chinook and coho, should it not also apply to the basin's depressed wild chum populations? We strongly believe it should. A comprehensive review of chum spawner goals is specifically required in the Adaptive Management section and the specified 2015 review would be the ideal time to develop distinct wild chum spawner goals for BOTH Humptulips and Chehalis. We propose adding the following language: The Department shall seek agreement with the Quinault Indian Nation to manage fisheries with the intent of meeting the distinct natural-origin Chinook and coho salmon spawner goals for the Humptulips River and the distinct natural-origin Chinook and coho spawner goals for the Chehalis River. The Department shall also seek similar agreement to meet distinct natural-origin chum spawner goals for the Humptulips River and the Chehalis River no later than the 2016 NOF process.
- Guiding Principles, item 2: Add chum salmon to the species requiring agreed upon escapement goals
- The rivers that only have natural production need to have increased protection.
- It is time for WDFW to manage wild Chinook and coho salmon escapement as the priority of this policy. Focusing on successful management of wild stocks is a better approach in the long run.
- Conservation and recovery of wild salmon. Meet wild salmon escapement .
- In those years where the saltwater fishery would be closed, there is no language that guarantees that the saltwater 'quota' will be passed up-river to the spawning beds. Could those chinook be used by the treaty and non-treaty nets to add time to their season or would those chinook be harvested in the freshwater with no monitoring provisions in place other than the status quo? It should be made clear that any savings resulting from a closure should be directly utilized in escapement and spawning objectives.



### **Conservation (cont.)**

- proper conservation is the main focus of our fisheries
- The fishery should be managed for escapement to build runs for the next generations!
- Comment on the Grays Harbor policy is good but worthless until the tribes are full partners in the management. One agency run by state and tribes with each footing half the cost and one enforcement arm. The escapement goals for salmon are about 1/10th to 1/100th what they should be. 12,300 Chinook escapement for the Chehalis basin is ridiculous. If you continue on this path where will soon not be any salmon. We need bold plans of action to drastically increase salmon runs , not beautiful policy statements.
- We, the gillnetters have for all intents and purposes have been the only user group in Grays Harbor that have been in a conservation mode to assure that we had a minimal impact on Chehalis Chinook. We have utilized our chinook impacts to maximize our harvest of coho and chum salmon. We are harvesting food fish for the citizens of the state of Washington of which 99% do not fish for salmon! In order to have a viable non-treaty commercial fishery we need to be allowed 2% impacts on Chehalis Chinook.
- The sports argue that gillnets are not selective but by regulating time of day, gear type, length of set, and run timing they are highly selective as proven last year in our directed coho fishery. Please ask region 6 staff for this data that proves this.
- The sport fishers have testified that gillnets are non-selective. We have proven with adjustments in time of day, net depth, size of mesh, and length of drift we can avoid many of the encounters with chinook. The observer programs prove this fact.
- I am saddened to learn that commission is favoring sport fishing over commercial fishing. I am also disappointed to see that many other avenues of conservation have not been explored. It seems that all accounts of fishery depletion are being pinned on the gillnet fleet. Commercial gillnetters are following the guidelines clearly set out by WDFW, and yet they are being "punished" for following the rules.
- I understand the complexities of coordinating with the tribal fisheries and that some elements may be outside of your control but if the Fish and Wildlife Commission are truly concerned about ensuring the sustainability of Chinook it is imperative the Quinault fishery be willing to participate in a fair manner as well, and perhaps they do. The tribal fishery is allotted a significant amount of time, far greater than the non-tribal fishery, per their treaties. If the tribal fishery is able to continue in this manner, this could negatively impact the Chinook fishery no matter what actions are taken to control the non-tribal and sport fishery catch rates. When I have engaged those in the public regarding these combined issues they feel the whole system is a "mess," including the tribe, the sport fishery who may be using large motors that could potentially destroying spawning beds, local organizations having to run the hatchery to keep it alive and lack of proper management over all of these issues.

### **Economic value**

- economic benefit of hatchery fish, yet completely fails to acknowledge the economic benefit that wild fish bring
- Having robust populations of wild salmon and trout is a key to this worthy social, environmental and economic goal.
- When proper conservation is administered, we have viable fisheries and that's what it takes to maintain our business and enjoy the sport.
- With hundreds of thousands of dollars that are being spent on the Columbia river for select area fisheries as the main stem netting is being replaced. In Grays Harbor we are being eliminated with No select areas or compensation of any kind! This is contrary to the legislative mandate to assess and maintain a viable commercial fishery in the state.
- Chair Wecker approached me about "SAFE AREAS" and my response was Grays Harbor and Willapa Bay. If in fact you use the proposed percentages you will curtail our fisheries to the point that they will not be viable.

### **Economic value (cont.)**

- Hundreds of thousands of dollars are being spent in the select areas on the Columbia as main stem netting is being replaced. In Grays Harbor we are being "planned" out with no chance of select area fishing or compensation.
- I am a third generation gillnetter in Grays Harbor and currently have the fourth generation in my family as crew on my boat. Grays Harbor has the highest unemployment rate in the state. I don't want to join the rest of the people in our county to draw unemployment that I cannot even qualify for because I am self employed.
- One must take interest in two recent articles in our local Grays Harbor paper. One on October 29, 2013 states by Congressman Derek Kilmer, "In Grays Harbor, we don't have Boeing and Microsoft, we have small business ... these resources are really, really important." Jan 30, 2014 reads, "Harbor still hardest hit with unemployment." Not only does this policy not have conservation in mind but will only add to Grays Harbor with another headline on increased unemployment. By voting yes on the policy as written does not save the resource but only adds to the highest unemployment rate in the state. If that is the burden you can sleep with at night, by all means pass this policy on. As stewards of the resource you should clearly see that this is a poor policy for both the people of the state and the resource of the region. Be responsible to the fish and our communities and vote this policy down,
- The salmon are owned by the public. Taxpayers whether they are fishermen or not pay the budget for WDFW. A very small percentage of citizens are fishermen, sport or commercial. License fees pay for a small portion of the budget. Consumers are a huge user group that aren't even considered in this plan. Their only access to the resource is through the commercial caught salmon. It is wrong to assume they can receive extra fish caught by sports fishermen beyond their needs.
- The sports have testified about how little money the net fishery generates. All the reports I have seen stop at the value of the salmon when it lands at the buyer, when actually the value should be followed all the way to the consumer's fork. The value increases to about 7 to 8 dollars per pound. Also if the sport fishery is such an economic boon to the Harbor area, why is it a person has to travel all the way to Olympia or Portland to find a new boat dealer or even a competent outboard mechanic?
- Please keep in mind that the decisions being made here will set a precedent for years to come and has the potential to have a negative impact on an already struggling economy in Grays Harbor County. The families supported by commercial fishing dollars in our community need to be a large factor in your future planning. I believe there is a way to achieve both a sustained fishery and avoid a negative fiscal impact to those involved.
- While we all recognize that changes must be made, I certainly hope the commission will consider the impacts of the continual cut back of the non-tribal gillnet fleet. These impacts certainly will have an immediate impact on our income, and the incomes of those in the fishing community, but in the long-term they will impact the legacy of family's like ours. Please do not end our way of life in order to silence the present demands of those who are unwilling to compromise. Commercial fishing is our heritage; it is our history and our future.
- I am writing to respond to the Grays Harbor management plan for 2014 for the Grays Harbor Basin. I have concerns the plan seems to be giving priority to the sport and recreational fishery rather than ensuring equality with the non-tribal commercial fishermen. The commercial fishing industry is extremely important to our local economy and is woven into the fabric of our history. This tradition has been passed down through the generations and I am concerned there will be nothing left to pass down to the next generation if we continue on the path we are on.
- I am the wife of a 4<sup>th</sup> generation gillnetter out of Grays Harbor. Adolf Bold, our great grandfather, made and fished his gillnets by hand as he worked as a German immigrant coming to the United States in hope of a better life. This year, my son was the 5<sup>th</sup> generation from our family to step on a Grays Harbor gillnet boat. This fishery is very much a part of our family's history and heritage. We value commercial fishing, specifically gillnetting, as it has supported our family for over a century.

### **Economic value (cont.)**

- Your decision will impact our future livelihood. It is only right that commercial fishermen be allowed to fish our fair share. At present your plan allows exclusive priority to sports fishermen. I would also ask that Grays Harbor be compensated in kind with the Columbia River to maintain a viable fishery in our state.
- The .8 for Chehalis allows minimal opportunity for coho and chum harvest. The 1.2 for the Humptulips pretty much states no non-tribal fishery in 2C.
- The Humptulips was a directed chinook fishery. With this in mind the 1.2% impacts is not going to give us a "viable fishery".
- By imposing this plan you will devalue my investment of my entire life my permits will become worthless my boat and gear will be devalued all this with no consideration for compensation on your part. The state has had buyback programs in the past for the sole purpose to reduce the number of fisherman so that the fisherman that wanted to stay fishing could make a better living. All this has done is lowered the amount of fisherman so that there is no one left to fight for what is ours.
- I'm not understanding the sport priority, or the wanting to put the GH Gillnetters out of business.
- This policy only re-allocates the fish to favor the recreational fishery. There are no caps on the recreational fishery on the Humptulips, which has the ability to harvest Chehalis fish at a 50% rate. The 5 % is a number that has been used in previous years.
- WDFW must find opportunity below the mouth of Hoquiam river for the N/T fishers, if they are to continue in Grays Harbor, and assure safe escapement to the Chehalis, and all streams therein. Plus increase opportunity for the recreational fishers to harvest these sought after salmon. This will increase the economics within the Grays Harbor economy community.
- In closing I am requesting that you "the commission" follow the law and make adjustments that will assure us a viable fishery in Grays Harbor

### **Accountability**

- Will monitoring of gillnet salmon fisheries be improved? Will more observers be added to the commercial boats?
- As far as this being an expensive fishery to operate, where will the savings come from? Will there be staff cut, enforcement? The data collected from the commercial fishery is essential to the data that aids the state of Washington with information on returning and future runs. The cost in this fishery is vital to fish data and should be looked upon as providing jobs for counties with the highest unemployment rate and state jobs. Let's keep the jobs that exist instead of trying to create something that might be.
- Please keep in mind that these fishermen are family driven people, they work very hard to make a living and are dependent on the resources that they harvest. There is continual accusation of the moral character of the fleet, the honesty of their catch, and the professionalism of their endeavors. While sportsmen continue to advocate for increased observation and supervision among the gillnet fleet, we would like to see increased observation among the sport fishery. The assumption that an individual has better intentions, better moral character, and stronger inclination to follow the rules simply because of fishing for sport vs. fishing for income is ridiculous. Assume the best of these men, their work ethic alone speaks volumes on the strength and endurance of their character.
- The Humptulips , Area 2C. The data you received started in week 40, which is the beginning of the coho fishery. Of course there will be very few chinook caught after the run is over. Please ask Region 6 for the data for our entire fishery. You will find that when adequate runs of chinook were present the shares were divided almost half between the sports and commercials. That is until 2013. when Region 6 came up with the idea that there is a mix of Humptulips and Chehalis chinook in area 2C. A fishery in 2C for chinook would magically use up our Chehalis encounters and eliminate the area 2A/2D coho fishery. But now in the 2014 draft management plan there is no mention of a mixed stock in 2C. Just eliminate the chinook fishery with incomplete data.

## Accountability (cont.)

- Almost the same scenario happened in the Chehalis. The data came from years when our fishery was severely limited by a lack of coho to catch, in the years prior to 2008. Since 2008 there have been healthy and abundant runs of coho to harvest. If this trend continues the non-treaty net fishery will be severely limited in their access to abundant coho. Total escapements from 2008 range from 37,000 to 127,000. That is after harvest by all user groups. Please request the complete data from Region 6. Following the recommendations in the plan will eliminate the non-treaty net fishery.
- The question needs to be asked of region 6 staff why is the data being withheld on the years 2009 to present years on the weeks prior to week 40 when we had a meaningful gillnet fishery on healthy and abundant wild and hatchery fall chinook ?
- The data the commission has been given by region 6 does not reflect the true harvest of the non-treaty net fishery. The years 2002 thru 2008 were some of the lowest harvests of chinook and coho due to the lack of fishing time and not a lack of healthy and abundant stocks of fish. The head of management from wdfw the first 4 years was an avid sport fisher and the nontreaty net fishery was not given the opportunity to harvest the abundant and healthy runs of salmon. 2002 thru 2005 were mostly during late October for the harvest of chum with some take of chinook and coho. I dont think the region 6 representatives gave you all the information you needed to make an accurate decision. I would like you to increase the commercial harvests from what you passed in January or not vote anything in until you have all the information you need, especially from the commercial industry.
- I would also verify that the numbers you are receiving from wdfw employees are true and accurate.
- The harvest allocations are based on a lack of data. On the Humptulips area 2C allocation, your base year data came from years that the non-treaty net fishery had little or no fishery. The allocation is based on fishing periods for coho not chinook, in weeks starting with week 40 which is after the chinook run is almost over. Request the data from years there were adequate chinook to harvest and you will find the chinook were divided close to 50% sport and commercial. You are eliminating our net fishery on bogus data. An allocation of 1.2% will only allow a catch of about 45 chinook. This will not even allow a day of coho or chum fishing.
- The same type of data was used on the Chehalis. It was taken from years of little or no fishing. We need about 65 chinook mortalities per day for a fishery in mid October and the encounters decline the later in October and November. On average runs in the 15000 range this would be approximately 1%.
- In my opinion the Commission should not vote to accept this plan until valid data is provided and the points I brought up are addressed. Thank you for your time.
- I believe that to delegate authority to the director to set seasons, is not the best thing to do as there has been too much close door seasons set for Gillnetter
- WDFW has placed very few restrictions on Grays Harbor, and the Chehalis River commercial fishers. They continue to fish in historic fashion with mortalities ranging in the 50% range, on weak stocks of concern. This fishery is one of the reasons we cannot reach rebuilding of critical stocks. There is an uncertainty of exactly what percentage of these released stocks are actually killed. With live boxes that are not utilized to the requirements of said fishery.
- Guiding Principles, #9: At the risk of showing my bias, do you realize that this would be a significant departure of current policy? Can you find one instance of a commercial fishing violation in Region 6 that's been prosecuted in the last twenty years? I truly hope that this can be accomplished, but the reasons given for no enforcement now are no money, and that it would take away from other enforcement activities. Check the video on FishingtheChehalis.net called the "Chehalis Fling" to see what I mean. If the use of a recovery box on a commercial vessel is at the fisher's discretion, why isn't the use of barbless hooks and knotless nets and the removal of a fish that must be released from the water also left up to the fisher's discretion?
- Accountability of all parties

### Accountability (cont.)

- “The Department shall work with the public to submit to the Federal Energy Regulatory Commission by December 31, 2014 the Wynoochee Dam mitigation plan and initiate spending of the mitigation funds in an expeditious manner thereafter.” A change in the date from December 31, 2014 to June 30, 2014, would allow funds to be spent from July 1, 2014. I’m well aware that much of the ground work has been done, a plan is in place. What needs to happen is getting a meeting set with the QIN, the Chehalis Tribe, WDFW, Tacoma City Light, and City of Aberdeen to work out details so that the process can finally begin. The mitigation fund was established about 20 years ago. The foot dragging on this process has been unbelievable. The date change would allow collection of brood stock, Coho and Steelhead, work could get done on the Wynoochee fish trap, vehicles could be purchased and related work started.
- Regardless of the Wildlife Commissions decision on the Grays Harbor fishery I would ask that Commission take steps to ensure that WDFW acts in a more transparent and professionally responsible manner when documenting their decision making process for closing or opening this season. The Sept 20, 2013 WDFW press release was disingenuous at best. It did not contain any data, did not cite any statistics about how much of increases in fishing pressure and catch occurred in 2013 when compare to what has occurred in the past years or what was expected in 2013.
- After reviewing comments from many citizens that have been submitted for Grays Harbor Management Plan I can honestly say that one common thread emerged and it is simply that absolutely zero trust exist that Region 6 District 17 staff will follow or more accurately not “reinterpret “ your new policy guidelines. This distrust is well founded in my mind after watching Ron Warren and Dr. Estalilla debate the meaning verbiage at a Adviser meeting of the existing plan and have two completely different interpretations of the same language. I have attached the comments from the Rec Advisers I signed on to and support as they help clarify the intent of the language. On a personal note I would like to express my appreciation of your effort in addressing the long standing grievances’ within the Chehalis Basin & Grays Harbor communities. The average citizen has had little impact on the decision making process within WDF&W Region 6 District 17 regarding harvest and conservation to be sure but in this process the Commission has began to demonstrate that this does not have to be so. With all sincerity thank you for all your efforts.
- I appreciate your work and the number of hours you’ve spent on this Plan. I am skeptical that it’s going to make a difference, but with your additions at the last Commission Meeting, it may have a chance.

### Sound Science

- Basing Salmon management on a 3 out of 5 year bases is a poor plan.
- data based decision making is the only form of decision making we should consider
- Grays Harbor salmon fisheries should be managed based on science, fact, and the law.
- If a more valid scientific study is needed instead of current means of measuring run size then those studies should be implemented.
- In para 12: “...*the development of new tools...*” do we have any recommendations/ideas to suggest as to what these new tools should be? I ask this in reference to several connecting threads in the proposed policy including: the 3 of 5 escapement provision; the 5% cap; the 4/3 net proposal; and the catch sharing recommendations. Those combined provisions could prohibit an in-bay, saltwater Area 2.2 recreational chinook fishery for many years but permit a freshwater chinook fishery in those years with a higher abundance under the 5% , 3 out of 5 year, conservation cap. I find this somewhat biased.
- WDFW has placed very few restrictions on Grays Harbor, and the Chehalis River commercial fishers. They continue to fish in historic fashion with mortalities ranging in the 50% range, on weak stocks of concern. This fishery is one of the reasons we cannot reach rebuilding of critical stocks. There is an uncertainty of exactly what percentage of these released stocks are actually killed. With live boxes that are not utilized to the requirements of said fishery.

### Sound Science (cont.)

- CWT. It has been stated, even by the N/T commercial fishers, that the CWT information utilized is flawed. When the CWT test was conducted, the N/T fishers fished all of the bay, areas 2C, 2B and 2D. When fish were checked at the unloading site, there was no accountability as to which side of the Bay the fish were landed. During the time of the test fishery, the net pen fish at the Westport release site, Coho, were marked to see where the different stocks turned up. This created a problem for WDFW, since they did not have funding to conduct a very thorough spawner survey. With that said, I doubt that the sampling was really complete enough to get the tags. Regardless of what the models may say.
- in season management.
- Guiding Principles, #10: I certainly hope so, but recognize this has never been done with respect to the commercial fisheries in Grays Harbor, at least a closing or shortening of the commercial season since I have been associated with fishing in this area.
- in-season management for commercial, tribal, and recreational fishers is key to accurate fishery management
- In para 12: "*...the development of new tools...*" I would like to see at least in-season, actively managed efforts by the State, structured like what occurred in Area 9/10 in recent years, in both the Grays Harbor saltwater and freshwater chinook fisheries. An active sampling program would monitor and allow WDFW to close fisheries more constructively.
- Guiding Principles, #10: The same situation is occurring in Coho and Chum as well, and I'm skeptical of this approach without an explanation as to why this is being done. If the goal is to make this a more transparent process, maybe an explanation is in order.
- Page 7, Adaptive Management, item 1: The commendable purpose of this section is to prevent the over-fishing that has prevailed in the past. However, it appears that these provisions could unnecessarily eliminate valuable fisheries. A better approach may be to focus on specific brood year escapements. For example, if 2014 coho escapements are low, fishing on the resulting adults in 2017 (2014 + 3) would be limited to 5% of the return. The same approach with Chinook would involve adding four years to the low escapement year.

### Gear Conflict

- With no state control over the Treaty fishery, if they fish more 4 days per week that would eliminate a non-treaty fishery with a 3 day per week net free restriction. This needs to be addressed in the plan.
- With no state control over the Treaty schedule, a 4 day maximum net fishery with 3 days net free per calendar week would eliminate the non-treaty fishery if the tribe uses all 4 days. This should never take place.
- With no state control over the Tribal fishery, a 3 day net free period COULD eliminate the state controlled net fishery. Since the chinook goal has failed 3 out of 5 years, the sports do not have a retention fishery in 2014. If the chinook run comes back with harvestable numbers the sports only get a mortality quota for a coho fishery in the Chehalis basin. This would leave adequate numbers for the Tribe to set a season for coho that could reach 7 days per week if the coho run comes back strong. Where does this leave the non-treaty net fishery? On the beach. Now we have no 2C or 2A/ 2D fishery.
- removing nets for a minimum of 3 days in a row will give the fish a chance to make it back to the hatcheries and native spawning grounds
- I also believe that closing area 2A in the Chehalis River if not this year but next year would have two important results. Public testimony by non-native commercial fishermen to this issue has stated that the tribe WILL NOT fish that area on the same days as commercial gillnetters. This means that a 4 days in and 3 days out will not be considered by the tribe in this area which means ALL of Grey's Harbor will not have 4 days in and 3 days out by all gillnetters. The river is also very narrow in this area and numerous gillnets will defeat recovery actions taken.

## Grays Harbor Control Zone

- Use as needed, but do not expand it.
- A more significant matter is the near-shore Grays Harbor control zone, specifically the various new proposals urging the Commission to expand it. The historic Washington coast ocean impact on Grays Harbor origin Chinook is already extremely small, historically about 3-4% of the ocean harvest by CWT data. While we recognize and support the conservation benefit of having the control zone in effect, the magnitude of additional Chinook savings achieved in closing this area has not been clearly established. However, it would be premature at this time to arbitrarily expand the control zone because doing so would unnecessarily diminish recreational opportunity for the marine harvest of other Chinook stocks (as well as other salmon species) that do not originate in Grays Harbor. It would also create a safety issue for participants in smaller boats that would be forced to venture further into deeper, less protected waters. Because of their limited range for safe access to legal fishing grounds and back, these boats would simply forgo fishing at all. If the commission feels strongly that an expanded near-shore control zone should be implemented, we urge doing so only in the most dire of circumstances, i.e. when the run-size forecast for natural-origin Chinook is smaller than 110% of the escapement goal.
- We support this action and have for the many years that it has been taken when GH fall Chinook have no harvestable surplus. As you know these stocks are far-north migrating and are heavily impacted in Canada and Alaska leaving little room for local impacts. Although very few are caught in Washington ocean fisheries we are supportive of the current Grays Harbor control zone currently and as officially proposed in the new policy. What we can't support is an extension of that zone northward off our coast. It's our understanding from anecdotal information that this is being pressed by some inland recreational folks. We're hearing that the additional area would run from the North Jetty at Westport out to 60 feet of water and north about 25 miles. The gain for Grays Harbor fall Chinook would be minimal and certainly not measurable with the current sampling process. On the other hand, that area has produced excellent Coho fishing over the past few years, in the fall particularly, and is a prime area frequented by private recreational boats. We would urge you to limit your action on Recommendation 2(b) to that which is currently proposed and which we continue to support.
- A more significant matter is the near-shore Grays Harbor control zone, specifically the various new proposals urging the Commission to expand it. The historic Washington coast ocean impact on Grays Harbor origin Chinook is already extremely small, historically about 3-4% of the ocean harvest by CWT data. While we recognize and support the conservation benefit of having the control zone in effect, the magnitude of additional Chinook savings achieved in closing this area has not been clearly established. However, it would be premature at this time to arbitrarily expand the control zone because doing so would unnecessarily diminish recreational opportunity for the marine harvest of other Chinook stocks (as well as other salmon species) that do not originate in Grays Harbor. It would also create a safety issue for participants in smaller boats that would be forced to venture further into deeper, less protected waters. Because of their limited range for safe access to legal fishing grounds and back, these boats would simply forgo fishing at all. If the commission feels strongly that an expanded near-shore control zone should be implemented, we urge doing so only in the most dire of circumstances, i.e. when the run-size forecast for natural-origin Chinook is smaller than 110% of the escapement goal.
- A controversy has arisen over a suggestion from a commercial advisor during a recent meeting to extend the boundaries of the Grays Harbor Control Zone that will shut down recreational fishing seasons within the zone if the escapement goals have not been reached in 3 out of 5 years. While changing the boundary may or may not prove a viable concept, we believe the proposal is premature and should await full vetting in the upcoming technical forums and development of the final Grays Harbor Management Plan. At this point in time, we suggest it would also be helpful to include a definition in the policy that matches the boundaries set forth historically by WDFW in past WACs as follows: *Grays Harbor Control Zone means waters within a line from the lighthouse one mile south of the south jetty, thence to Buoy number 2, thence to Buoy number 3, thence to the tip of the north jetty, thence to the exposed end of the south jetty, thence following the south jetty and shoreline to the lighthouse.*

## **Hatchery production**

- I strongly support Fish and Wildlife seeking to restore hatchery funding that was cut for the Grays Harbor basin in the 2007-2009 biennium. Investing in hatchery fish could help to increase economic gains for our local economy and help sustain our fisheries. Protecting the wild population of fish is extremely important but should not be the primary goal. Supporting and protecting our hatchery sources, including the tribes efforts in this, will continue to produce fish for all, and will help protect our wild populations. Habitat protection is also very important.
- What is left of our brutalized Wild Stocks need your clear visions to the future or there will only be stories told of them. There are the facilities in place on our rivers to produce hatchery fish to please the masses and they should be highly utilized.
- I'm a non-Indian gillnet fisherman of Grays Harbor and am writing this letter to tell a story of when I was a boy. I was a 4-H member for a good number of years. As a 4-H member we all had projects. My project was rising silver salmon from eggs to the time they were ready to be released to the wild. The Washington Department of Fish and Wildlife would provide plans on how to build a fish trough to hatch and raise the salmon. My dad built this fish trough and we put it back to the creek behind our house. Then we would spend the day and drive to the satsap state fish hatchery get the silver salmon eggs, 20,000 of them, it was a fun project. I would go back to the creek every evening after school to check on the eggs to make sure they would stay healthy by picking out the few dead ones. When the salmon became a inch long and the egg sack was almost gone my dad brother and I would take them way up the east hoquiam river and release them in the same spot every year. Now these silver salmon were released to the wild, not from a state fish hatchery. In four years these salmon would come back as what the Washington Department call's "Wild Salmon" because they don't return to a state fish hatchery. No clipped fin's. Those salmon have been returning to the same stream's where they were released for many year's and many year's to come from the many 4-H project's kid's who had been raising salmon. Why doesn't the Washington Department of Fish and Wildlife have these salmon raising program's for the kid's going on now? Every one would benefit from it. Kid's, 4-H, Boy scout's, Girl scout's, Cub scout's, the Sport, Commercial, Charter and Tridal fisherman, everyone. It would also help the state fish hatchery's to produce more salmon. The river's of Grays Harbor, Willapa Bay, the Colombia River and many other river's of Washington would be popping with salmon. The Washington Department of Fish and Wildlife would save lot's of money for other salmon project's by having fish raising program's like this. The river's of Grays Harbor would have lot's of salmon for many year's to come, And they would be released to the wild, Not from a state run fish hatchery. The point is that state hatchery salmon are three to five inches long and are feed and cared for. Their fin is clipped and then their released from the fish hatchery. these salmon are called hatchery fish.
- Simply increasing hatchery plants to the basin, doesn't fix the habitat issues facing wild stocks in the basin

## **Habitat**

- large areas of degraded habitat in the basin and that is very apparent when fishing the area. Simply increasing hatchery plants to the basin, doesn't fix the habitat issues facing wild stocks in the basin

## **Marine mammals**

- The harbor seal population needs to be addressed. They harvest more than fishers do, sport and net combined.

## **Nutrient Enhancement**

- Nutrient Enhancement - This has been talked about all over the state with very little action from WDFW because of the money they collect. The mortality rate of smolts would decrease if they had enough body fat to transition from fresh water to salt water. Not to mention all the other wildlife that would benefit. Basic biology.