

2017 Puget Sound Recreational Salmon Regulations Concise Explanatory Statement



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Recreational Salmon Regulations for 2017

This Concise Explanatory Statement (CES) describes the Washington Department of Fish and Wildlife's (WDFW) reasons for adopting the 2017 Puget Sound recreational salmon fishing rules and responds to public comments received on the proposed rules. The adopted rules are set forth in Washington Administrative Code (WAC) 220-220-160, 220-300-160, -220 and 220-310-030, -210 and 220-312-040 and 220-313-020 and -060.

The CES contains three principle sections. **Section I** describes the rule being adopted, the process used in adopting the rule, and the resource management objectives advanced by adoption of the rule. **Section II** describes the changes from the proposed rule to the adopted rule. **Section III** discusses comments received during rulemaking and the agency's analysis and resolution of those comments.

I. Rule Development Process

The CR 101 notice of intended rule making was filed on January 7, 2017 (WSR 17-03-042). Thereafter, the Department relied upon several forums to gather information and interact with regional fishery managers and constituent groups in order to develop a draft rule that would be presented in the CR 102 filing on May 23, 2017 for formal public review and comment (WSR 17-11-122).

Each year, WDFW and the Northwest Treaty Tribes work collaboratively as co-managers to reach agreement setting fishing seasons for recreational, commercial, and tribal fisheries based on best available science regarding expected salmon returns. The name "North of Falcon" (NOF) refers to Cape Falcon, Oregon, which is the southern border of active management for Washington salmon stocks. This process consists of a series of public meetings involving federal, state, tribal and industry representatives and other concerned citizens. The NOF planning process coincides with the March and April meetings of the Pacific Fisheries Management Council (PFMC), the federal authority responsible for setting ocean salmon seasons 3 to 200 miles off the Pacific coast. In addition to the two PFMC meetings, the states of Washington and Oregon and the Treaty Tribes sponsor additional meetings to discuss alternative fishing seasons that meet conservation and harvest sharing objectives. Additionally, WDFW solicits input from advisory groups whose representatives represent a diverse range of user group interests.

The development of salmon fishing seasons begins with completion of previous year's spawning grounds escapement surveys and estimates by state and tribal biologists. Escapement estimates from some stocks may not be available from the previous calendar year due to their late spawn timing; coho are particularly problematic. Biologists apportion

catch in each area to specific management groups and calculate a total run-size for each group. Biologists complete this analysis, also known as a run-reconstruction, each fall or early winter. Based on total run-size and the associated survival rates, state and tribal biologists forecast the number of salmon returning for the coming year. State and tribal biologists typically complete the forecasts each year by late-February, thus achieving a significant amount of work prior to start of developing fishing seasons. From the run size forecasts, fisheries managers determine the amount available for directed or incidental harvest according to the management objectives. Once the forecasts and the number of fish available for harvest are determined, state and tribal fisheries managers can begin the process of developing specific fishing regulation proposals.

The 2017 annual public process for developing salmon fishery regulation proposals, known as the North of Falcon process, began on February 28 in the General Administration Auditorium in Olympia. WDFW presented and discussed the 2017 preseason forecasts of salmon abundance with interested stakeholders. Implications of the forecasts and 2017 season planning were discussed in break-out sessions for the Columbia River, Ocean, and Puget Sound (all) during this meeting. Additional public meetings were as shown below in the Public Meeting Table.

Public Meeting Table. All meetings occurred in Washington State unless noted otherwise.

Geographic Area	Date(s)	Location
Willapa/Grays	February 22	Montesano
All	February 28	Olympia
Grays Harbor	March 7	Montesano
Ocean	March 7-13	Vancouver
Puget Sound	March 15	Mill Creek
Puget Sound	March 16	Sequim
All	March 17	Olympia
Willapa Bay	March 23	Raymond
Columbia/Ocean	March 24	Vancouver
Ocean	March 27	Westport
Mid-Columbia/Snake	March 28	Chelan
Grays Harbor	March 28	Montesano
Mid-Columbia/Snake	March 29	Clarkston
Columbia River	March 30	Kennewick
Willapa Bay	March 30	Raymond
Puget Sound	April 4	Lynnwood
Columbia/Ocean	April 5	Olympia
All	April 7-12	Sacramento
Grays Harbor	April 14	Montesano
Willapa Bay	April 17	Raymond

During these public meetings, WDFW gathered input on structuring fishing seasons, possible rule changes, and provided the public with information on the status of the 2017 planning process. WDFW considered the fishing regulation proposals shared at public meetings as a work in progress (i.e., not final proposals) that would be further informed by comments received from meeting participants. Additionally, fishing proposals were informed by the public comments received online via the North of Falcon WDFW website, for those individuals who could not attend the public meetings from February 28 through April 11.

Additional public input meetings for Puget Sound recreational fisheries occurred on December 8, 2016 and January 5, February 7, March 15, and March 30, 2017 with the Puget Sound Sportfish Advisory Group. The advisory group meetings were held in the Natural Resource Building in Olympia and included an option to participate through a telephone conference. Sportfish advisors provided fishing proposals for the upcoming year in addition to reviewing previously submitted fishing proposals, meeting schedule, and forecast update of the upcoming runs were shared electronically as data became available.

During the 2017 North of Falcon season planning process, the tribal co-managers and WDFW conducted technical meetings and policy level discussions to agree on conservation objectives, run-size forecasts, and estimates of the allowable tribal and non-tribal catch shares for the various salmon runs considered in defining fishing levels. WDFW and the tribes also developed fishing schedules for both tribal- and state-managed salmon fisheries. Written and oral comments received during this process were considered in the development of WDFW's own package of rules. The recreational salmon fishing seasons proposed for adoption by WDFW in 2017 are product of both the government-to-government, tribal-state negotiation component, and the open public process component of the annual North of Falcon process. In addition, rule proposals developed in connection with these processes have been vetted based upon public input obtained in the formal public rule-making process undertaken by WDFW pursuant to the Administrative Procedures Act.

Based upon all of the information and outreach generated through these forums, a draft rule was developed for consideration in the public rule-making process that follows the filing of a proposed rule. Accordingly, the CR-102 was filed on May 23 and published in WSR 17-11-122, as part of WDFW's initial rule-making proposals for 2017. The filing included changes to Code (WAC) 220-220-160, 220-300-160, -220 and 220-310-030, -210 and 220-312-040 and 220-313-020 and -060. Information regarding the proposed rule changes was electronically and physically mailed out to participants in the North of Falcon process who provided their contact information at meetings as well as posting it on WDFW's website.

Fishing dates and locations were modeled to propose a meaningful recreational fishery that is consistent with treaty tribe sharing principles, as well as conservation objectives considering that there will be non-directed harvest mortality arising from the incidental catch of non-target salmon. In addition, the season structure and areas open for fishing were shaped to reduce the interaction between sport and commercial fisheries. This furthers the objective of maintaining orderly fisheries.

A formal rule-making hearing was held on June 27, 2017 to provide an additional opportunity for comments to be received on the proposed rules as published in the Washington State Register. Three individuals attended the hearing, and two of those individuals provided verbal and written comments, which are documented in Section III. In addition to input during the public meetings, comments received by letter, electronic mail, and online on the North of Falcon WDFW website during the North of Falcon process were considered as part of the rule-making process.

Rationale for Adoption of Rules

WDFW considered all the facts and circumstances surrounding the proposed 2017 recreational salmon season. The agency carefully reviewed all input from the general public regarding preferred fishing rules during North of Falcon public meetings and the state's rule-making process. WDFW considered and relied upon the best technical and scientific information available to tribal and state fishery management experts, including pre-season forecasts of the abundance of salmon stocks and data that will be used during the season to update forecasts. Important characteristics of the recreational salmon fishery were considered, including the catch likely to result from the proposed rules, providing significant harvest opportunities, and the economic value of these fisheries. WDFW also considered fishing schedules of state commercial fisheries and the schedules of tribal fisheries, as in some cases these schedules must be coordinated with the state's recreational fishing schedules as part of the co-management process developed under sub-proceedings of United States v. Washington.

Regulations for the 2017 recreational salmon fisheries were considered with respect to established objectives. These objectives include generally applied statewide objectives, together with detailed regional specific objectives described within regional sections below. These objectives were shared with recreational angler representatives during the 2017 North of Falcon and APA public processes, and are listed below in order of priority:

- 1) Conserve the wildlife and food fish, game fish, and shellfish resources in a manner that does not impair the resource (RCW 77.04.012) by achieving conservation objectives for all species and stocks

- a) Ensure primary stocks meet escapement goals and/or management objectives (e.g., exploitation rate).
 - b) Manage fisheries consistent with Fish and Wildlife Commission Policies POL-C3608 (2017-2018 North of Falcon) and C3619 (Hatchery and Fishery Reform).
 - c) Monitor fisheries to ensure a & b are met.
- 2) Harvest the non-treaty share of harvestable salmon.
 - 3) WDFW shall promote orderly fisheries and shall enhance and improve recreational and commercial fishing in this state.
 - 4) WDFW shall seek to maintain the economic well-being and stability of the fishing industry in the state.

Regional Specific Rationale

State and tribal salmon seasons in Puget Sound are driven primarily by certain key constraining stocks (Objectives 1a, 1b, and 2). Key constraining stocks in state and tribal fisheries in these areas for 2017 include Dungeness spring natural Chinook, Nooksack spring natural Chinook, Mid-Hood Canal natural Chinook, Skokomish natural Chinook, Skagit natural coho, Stillaguamish natural coho, and Queets natural coho. For example, the management objective for Dungeness spring natural Chinook is a Southern U.S. exploitation rate ceiling of 6.0% as defined in the ESA approved harvest management plan. The management objectives for coho are based upon the Comprehensive Coho Management Plan (1998). Queets River natural coho has an escapement goal of 5,800. However, for 2017 the co-managers agreed to lower the goal so that limited fisheries impacting Queets coho could occur, thus preventing large-scale fishery closures.

2017 Constraining Stock Table.

Stock	Objective Type	Objective Criteria	Modeled Result
Dungeness spring natural Chinook	Southern U.S. Exploitation Rate	≤ 6.0%	6.0%
Nooksack spring natural Chinook	Southern U.S. Exploitation Rate	≤ 10.0%	10.0%
Mid-Hood Canal natural Chinook	Pre-terminal Southern U.S. Exploitation Rate	≤ 12.0%	11.1%
Skokomish natural Chinook	Exploitation Rate	≤ 50.0%	47.5%
Skagit natural coho	Southern U.S. Exploitation Rate	≤ 9.0%	9.0%
Stillaguamish natural coho	Southern U.S. Exploitation Rate	≤ 8.2%	7.5%
Queets River natural coho	Escapement Goal	5,130	5,130

Some fishing regulations and restrictions in 2017 are the same as previous year’s regulations designed to reduce mortality on key salmon stocks, thus no changes were proposed for 2017. For example, in 2017 Lake Washington sockeye salmon are forecast to be below the escapement goal objective, similar to 2016. The sockeye recreational fishery in Lake Washington in 2017 is not listed as open unless sufficient sockeye are counted at the Ballard Locks in-season, which is the same management approach applied in 2016. Because protective regulations were already in the permanent rules, we did not propose a change to the Lake Washington sockeye salmon regulations in this rule-making package.

Some fisheries were modified to reduce conflict with tribal fisheries and/or to ensure orderly fisheries (Objective 3). Puget Sound regulation changes were proposed based on North of Falcon discussions with stakeholders and tribal co-managers. These changes maximize recreational opportunity while meeting conservation objections.

Modifications proposed for 2017 Puget Sound Marine Area recreational fisheries through this rule-making process include:

- Retention of hatchery coho is permitted in most marine areas when open for other species (i.e., Chinook, pink) due to sufficient hatchery coho returns and slightly improved wild coho returns for most systems.

- Additional limit of pink salmon removed from the daily limit in all marine areas, and closure of Dungeness Bay pink fishery to protect low return of pink salmon.
- Areas 5 and 6 winter mark-selective Chinook season reduced to protect Dungeness spring natural Chinook.
- Area 7 winter mark-selective Chinook season reduced; closure of Eastern/Rosario Strait during July; and both earlier start and expansion of the Bellingham Bay closure to protect Nooksack spring natural Chinook.
- Bellingham Bay fishery allows retention of coho due to increased returns expected to terminal areas.
- Shore-only fishery is open for retention of pink salmon and hatchery coho in the portion of Area 9 within northern Hood Canal (north of Hood Canal Bridge and south of the Foulweather Bluff-Olele Point line) from July 16-August 15, and in all of Area 9 from August 16-September 4. Additional shore-only fishing is open at Possession Point within Area 8-2 from August 1-September 4 to hatchery coho retention only. These shore-only regulations were proposed to avoid complete closure of the marine areas due to conservation concerns for Skagit and Stillaguamish wild coho and pink salmon, while enabling some limited opportunity on more abundant hatchery coho and pink salmon stocks expected to return in these areas.
- Area 9 is closed from July 1-15 and Area 10 from June 1-30 to protect natural Chinook and wild coho.
- Areas 10 and 13 are open during coho run timing due to sufficient returns of hatchery coho expected, and Area 11 is open during both coho and Chinook run timing. An additional month opened in the Area 11 winter Chinook fishery due to sufficient returns of coho and Chinook.
- Removal of gear restrictions in Elliott Bay and open to Chinook retention for 3 days in August due to surplus Chinook returns expected.
- Duwamish Waterway Special Rules boundary adjusted to provide simple regulations and align with mouth boundary change (Green River).
- Areas 7, 8-1, 8-2, 9 and 10 winter mark-selective Chinook fisheries have a reduced daily bag limit of one marked Chinook to provide season stability.
- Chico Creek open in free-flowing freshwaters due to sufficient returns of salmon expected.
- Additional clarity in restrictions of fishing from Hoodspout Salmon Hatchery structure to protect facilities and safety for anglers.
- Area 12 north of Ayock Point coho fishery opens in August to harvest surplus coho and pink while protecting wild Chinook with hook size restriction through August 15.

- Area 12 south of Ayock Point two pole endorsement: reduced season to July 1 through September 30 to reflect summer Chinook season.
- Possession and delivery of Canadian-origin food fish and shellfish process to obtain Canadian customs clearance number adjusted to provide simple regulations to properly document and transport catch back to Washington.

The proposed regulations were adopted without modification as listed in the section below titled 'II. Corrections to the WSR 17-11-122'.

Modifications proposed for 2017 Puget Sound Freshwater recreational fisheries through this rule-making process include:

- Numerous river sections were consolidated and regulations were standardized were feasible to simplify regulations.
- Additional daily limits of pink salmon removed from open salmon fisheries due to lower pink salmon forecasts.
- Baker Lake sockeye daily limit decreased to four due to smaller run of sockeye expected and an early opening date per public interest.
- Skagit River sockeye fishery closed dates adjusted to reflect co-manager agreement and avoid gear/user group conflicts.
- Increase the daily bag limit of hatchery coho to six in the South Fork Nooksack River due to surplus hatchery coho returning; gamefish season closed in specified sections of the Nooksack during Chinook spawning to protect Nooksack Spring Chinook.
- Skykomish, Snohomish, Wallace, Lake Washington, Lake Sammamish, Green, Puyallup, Carbon and Nisqually rivers and their associated tributaries open to fishing for gamefish and coho due to increased coho returns expected.
- Skagit and Stillaguamish rivers: associated tributary gamefish and salmon fishery closures adjusted to protect wild coho and pink salmon due to low returns expected.
- Lake Sammamish open for gamefish year-round and allow landlocked salmon rules to permit harvest of resident/landlocked hatchery coho due to surplus hatchery coho available.
- Green River mouth adjusted to the southernmost tip of Harbor Island creates an additional river section; hook size restriction removed in all sections and a one Chinook daily limit allowed starting September 1 from Old Highway 99 to I-405, due to surplus Chinook expected.
- Puyallup and Carbon rivers opened with adjusted day closures due to considering tribal fisheries; simplify regulations and harvest surplus hatchery Chinook, coho and pink.
- Nisqually River closed to salmon fishing after November 15, and require the release of chum to protect winter chum that are not expected to meet escapement; salmon

daily limit reduced to two due to lower forecasted returns of pink and coho salmon and to simplify regulations.

- Skokomish River closure adjusted, due to unresolved tribal property boundary issue; allow gamefish fisheries upstream of disputed area while protecting steelhead.
- Big Quilcene River implemented anti-snagging rule and allowed coho hooked outside the mouth to be retained to encounters of summer chum while allowing harvest on surplus of hatchery coho.

The proposed regulations were adopted without modification as listed in the section below titled 'II. Corrections to the WSR 17-11-122'.

II. Corrections to the WSR 17-11-122

Technical and organizational edits were made to improve accuracy, clarification, and intent of the rule in WAC 220-312-040. Additional edits include:

- South of Ayock Point, Marine Area 12 increased the Chinook daily limit to four to reflect co-manager agreement in WAC 220-313-060.
- Carbon River fishery requires the use of barbless hooks to reflect regulations in the Puyallup River as described during the public process for simplified regulations in WAC 220-312-040.
- Cascade, Sauk and Skagit River opening dates for trout were changed to accurately reflect opening dates in WAC 220-312-040.
- Closures from 2016 salmon and trout fisheries were corrected to accurately reflect 2017 co-manager agreements in the Greenwater River, McAllister Creek, Nisqually River, Raging River, Skykomish, Sultan, Tye, Wallace, and White (Stuck) River in WAC 220-312-040.
- South Fork Nooksack River applied a one single point hook rule to be consistent with open salmon fisheries within the system in WAC 220-312-040.
- Puyallup River modified fishery closure dates to reflect co-manager agreements and provide simplified regulations as described during the public process in WAC 220-312-040.

III. Response to Comments Received During Comment Period for WSR 17-11-122

Two verbal comments and twelve electronic comments were received regarding Puget Sound recreational seasons. They are summarized into the following comments (and responses):

Comment 1: Increase Chinook limit to four in South of Ayock Point, Hood Canal during the summer fishery.

Response 1: Chinook limit was increased from two to four to allow increased harvest on hatchery Chinook. State and tribal fishery managers agreed to a four-chinook limit for this area during the annual season-setting process this spring. This change occurred through an emergency rule prior to the end of the public commenting period and has been incorporated into the section of this document titled 'II. Corrections to the WSR 17-11-122'.

Comment 2: Simplify regulations by allowing two-poles to be used in all marine areas.

Response 2: Two-pole use in marine waters increases salmon encounters by 11% (based upon data collected during recent dockside sampling surveys) and therefore increases expected fishery mortalities (impacts) on salmon stocks of conservation concern. Pre-season modeling of expected impacts on Endangered Species Act-listed Puget Sound Chinook as well as coho stocks of conservation concern relative to each stock's management objectives, showed that no additional impacts remained for expansion of two-pole regulations. In fact, during the 2017 North of Falcon process, many fisheries had to be reduced to meet conservation objectives for the 2017 season. Input gathered from the recreational fishing public (e.g., during NOF public meetings, online commenting process, advisory groups) has shown there is no clear consensus to expand two-pole use, as many anglers rank two-pole use as a lower priority compared to other means of increasing opportunity when planning fisheries based on very limited impacts allowed on stocks of concern. Generally, two-pole use is best suited for low catch rate areas, and WDFW has implemented extensive two-pole regulations in several well-suited areas, such as .

Comment 3: Open coho fisheries (i.e., Marine Area 9) during peak coho fishing or close all salmon fisheries year-round to simplify regulations.

Response 3: Meeting conservation objectives for Skagit, Stillaguamish and Queets River coho would not be possible if WDW opened Area 9 to boat fishing (rather than shore-only as scheduled) during the second half of August and early September (or if the opening were delayed until September-October), because majority of coho catches occur during these months. Additionally, staff modeling of mark-selective coho fisheries and the associated release mortality rates on wild coho resulted in over-exploitation of those stocks of concern. On the contrary, closing all fisheries would simplify regulations. However, the public meetings throughout North of Falcon resulted in a clear majority of the public placing a high value on harvest and fishing opportunities, noting the benefits to the economy received by local businesses. The recreational community and sportfish advisors have consistently provided input aiming to maximize seasons, inherently creating more complex regulations in order to provide more fishing opportunities.

Comment 4: Reduce snagging in the Puyallup River by enacting a maximum leader length.

Response 4: In previous North of Falcon planning sessions, discussions have occurred about whether to apply a maximum leader length to not only reduce snagging but also reduce encounters on wild fish so that more harvest could occur on hatchery fish. However, the majority of the public requested more data collection to see what effects a reduction in a leader length would have on stocks of concern. WDFW has started to collect that information, but more data are needed to achieve increased understanding of the effect of changing a leader length during both pink and non-pink years. Additionally, there has been strong public support for the Department to provide simpler regulations, and this rule would not support the rule simplification initiative.

Comment 5: Remove gamefish closures in the Skagit and Stillaguamish river systems.

Response 5: Gamefish fisheries during pink and coho salmon run timing were closed to reach agreement at North of Falcon with co-managers in order to achieve the conservation goals of Skagit and Stillaguamish wild coho and pink salmon. Co-managers determined there was an increased risk of not meeting salmon conservation goals for key stocks of concern, due to observations of illegal poaching during gamefish seasons, and uncertainty regarding the release mortality rate for salmon encountered in these gamefish fisheries. This uncertainty regarding impacts on salmonids during gamefish seasons exists during negotiations with co-managers because of the lack of creel data to support negligible or any quantitative number of impacts from the gamefish fisheries.

Comment 6: Increase Chinook harvest opportunity in Elliott Bay.

Response 6: The last Elliott Bay Chinook fishery occurred in the summer of 2010 and was limited to Fridays-Sundays only due to the Duwamish/Green River run size diminishing compared to previous years. The recreational fishery in both Elliott Bay and Green River and the tribal fishery are planned with a smaller scale than previous fisheries to ensure escapement to the spawning grounds occurs for future years can provide hopefully larger fisheries.

Comment 7: Open fisheries that are meaningful for opportunity.

Response 7: WDFW staff, public and sportfish advisors evaluate data to provide the most meaningful fisheries to the public with the understanding that each year a specific constraining stock will limit fishing opportunities. Variables evaluated include economics, harvest, days open, simplified regulations and exploitation rates on constraining stocks. Through the Fish and Wildlife Commission Policy POL-C3608 (2017-2018 North of Falcon), unique opportunities throughout Puget Sound are also pursued when the opportunities present themselves given co-manager discussions, public interest and impacts to constraining stocks.

Comment 8: Increase recreational fishing opportunities to achieve a 50/50 sharing balance with the tribes.

Response 8: Each year for over three decades, the Northwest Treaty Tribes and WDFW have worked collaboratively as co-managers to reach agreement setting fishing seasons for recreational, commercial, and tribal fisheries based on best available science regarding expected salmon returns. Generally, the state and tribes still use the Puget Sound Salmon Management Plan (PSSMP) to provide guidance for harvest allocation during the NOF planning process. However, not part of the Boldt Decision (or subsequent state-tribal PSSMP developed during the 1970's and 80's), is the current situation of having to negotiate state and tribal fisheries while navigating through the complexity of federally-mandated conservation requirements for Endangered Species Act (ESA)-listed salmon and steelhead. Since 1999 (ESA-listing of Puget Sound Chinook), WDFW managers have to plan and negotiate diverse salmon fisheries in a complex ESA landscape in which conservation is a paramount concern, while at the same time working to provide salmon fishery opportunities where possible to achieve the non-tribal share of salmon. Even the PSSMP does not specify literally 50/50 state-tribal sharing, and says that sharing can vary based on regional state-tribal agreements. In planning and modeling salmon fisheries on a stock-by-stock, river-by-river basis for Puget Sound Chinook, for example, some stocks are over the 50% point of state-tribal sharing in favor of tribal fishers, while other stocks are over 50% in favor of non-tribal fishers. This is particularly the case when considering marked fish caught in mark-selective fisheries, which tribes generally do not implement. In sum, mixed stock management, weak stock constraints, and working to provide fair harvest sharing for all parties while taking into account differing fishery social objectives, adds appreciable complexity to what may otherwise seem like a simple formulation of 50/50. Thus there are individual runs where 50/50 is not possible or desirable. Overall, we seek a fair allocation of harvest between state and tribal fisheries.

Comment 9: Open tribal meetings to the public through the North of Falcon process.

Response 9: This comment is not within the scope of WSR 17-11-122 for the 2017-18 recreational salmon fishing season rule changes. In general, WDFW is committed to open and transparent government. All legally required public meeting requirements have been met. We continue to confer with tribal co-managers about the transparency of NOF, but cannot force our views upon tribal co-managers. WDFW's efforts to maintain transparency must operate within the confines and realities of government-to-government negotiations with 20 individual treaty tribes during the NOF process. The tribes are sovereign governments and, as such, they need only to meet with or negotiate agreements with the representatives of the government of the State of Washington, in this case the Director of WDFW and the appropriate agency staff. The state cannot impose its authority onto the tribes to open the government-to-government negotiations to the public. Additionally the state cannot refuse to engage with the tribes, except based upon on our terms alone, as we need to have collective, co-manager developed fishing plans.

Comment 10: Improve tribal catch accounting and forecasting.

Response 10: This comment is not within the scope of WSR 17-11-122 for the 2017-18 recreational salmon fishing season rule changes. However, we continue to work with tribal co-managers on effective and robust co-manager accountability for harvest. We note that

some comments on social media asserting ineffective tribal catch accounting were based upon faulty assumptions and/or an incomplete understanding of fish ticket reporting and processing of data.

Comment 11: Provide a Skagit River steelhead catch-and-release fishery.

Response 11: This comment is not within the scope of WSR 17-11-122 for the 2017-18 recreational salmon fishing season rule changes.

Comment 12: Provide a Skagit River steelhead catch-and-release fishery.

Response 12: This comment is not within the scope of WSR 17-11-122 for the 2017-18 recreational salmon fishing season rule changes.

The proposed regulations were adopted without modification.

Conclusion

WDFW has considered all the facts and circumstances surrounding the 2017 recreational salmon season schedule. The agency carefully reviewed all input from the public during the North of Falcon public meetings and the state's rule making process. The agency's 2017 recreational salmon fishing regulations comply with its statutory mandate and are consistent with WDFW's management objectives for these fisheries.