

Willapa Bay Salmon Management Policy – (Briefing/Public Comment)

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Fish and Wildlife Commission Presentation Summary Sheet

Meeting date:

8/12/2023

Agenda item:

Willapa Bay Salmon Management Policy

Presenter(s):

Marlene Wagner, Kelly Cunningham, Chad Herring, Kenneth Warheit

Background summary:

In the fall of 2014, the Washington Fish and Wildlife Commission (FWC), supported by Department staff, initiated development of a salmon management policy for Willapa Bay. The intent of the policy was to provide Department staff with general guidance and management objectives for salmon management in Willapa Bay.

In June 2015, the Policy was adopted by the FWC as the *Willapa Bay Salmon Management Policy – C-3622*. The FWC also requested a thorough review of the implementation and performance of the 2015 Policy. In December 2020, the *Comprehensive Evaluation of the Willapa Bay Salmon Management Policy C-3622*, was accepted by the Commission and it was determined that revisions to the policy were warranted, starting a formal policy revision process. Since then, the Commission has held 20 meetings specifically on Willapa Bay Salmon Management Policy revisions, six of which were open for public comment. Throughout this time, Department staff were asked to provide alternative policy language incorporating those initial topics of revision (Alternative 3). The Fish Committee also provided another version of a policy document for Willapa Bay salmon management (Alternative 2) after reviewing Alternative 3. After much analyses and deliberation, a final draft of a new, revised Willapa Bay Salmon Management Policy was presented and discussed during a special Fish Committee Meeting in May of 2023 solely on this topic. In June of 2023, the full Commission agreed the policy was ready to be put forth for final public comment. This meeting will provide Commissioners with a briefing on the public comments received during this formal comment period.

Staff recommendation:

Commission to hear public comment and a briefing on written comments during the formal comment period.

Policy issue(s) and expected outcome:

The Commission will review the public comments and determine what steps to take moving forward, if any.

Fiscal impacts of agency implementation:

Not applicable.

Public involvement process used and what you learned:

Public involvement in the review was included throughout the Policy Review process and Department staff sought public input through twelve public or advisory group meetings as well as through the Willapa Bay Policy Review webpage. The meetings began in January of 2018 and concluded with a public meeting held via webinar on August 18, 2020. Since the Comprehensive review process was completed in December of 2020, the Commission has heard public comment six times on Policy revisions, most recently in May of 2023. Public comment is also a part of this meeting's agenda. Department staff continue to take comment through the Willapa Bay email distribution list.

Action requested and/or proposed next steps:

Department staff will seek full Commission approval for the Draft Willapa Bay Salmon Management Policy in September.

Draft motion language:

Not applicable.

Post decision communications plan:

If the Commission requests additional revisions, those requests should be communicated to stakeholders via the webpage developed for the Willapa Bay Salmon Management Policy Review on the Agency website as well as through a post meeting press release.

**FISH AND WILDLIFE COMMISSION
POLICY DECISION**

**POLICY TITLE: Willapa Bay Salmon
Management**

POLICY NUMBER: C-XXXX

Supersedes: Policy C-3622

Effective Date:

See Also: Policy C-3622

Approved by:

Chair, Washington Fish and Wildlife Commission

Purpose

The purpose of this Policy is to set management objectives and to provide management guidance for natural (in-river) and hatchery production, and recreational and commercial harvest of fall Chinook, coho, and chum salmon populations in Willapa Bay.

Authority Definition and Intent

This Policy is established by the Washington State Fish and Wildlife Commission (Commission) and is applicable to the management by the Washington State Department of Fish and Wildlife (Department) of fall Chinook, coho, and chum salmon (salmon) in Willapa Bay and its freshwater tributaries as the Commission's interpretation of the Commission and Department mandate described in RCW 77.04.112.

The intent of this Policy is to provide guidance for the management of natural- and hatchery- origin production, and recreational and commercial harvest of fall Chinook, coho, and chum salmon in Willapa Bay. Management of natural- and hatchery-origin production and harvest will be transparent and consistent with normal agency operations and existing agency and Commission policies (e.g., C-3624: Anadromous Salmon and Steelhead Hatchery Policy).

Policy Objectives

These policy objectives are a statement of the Commission's values and vision for the future conditions of Willapa Bay environment, the fall Chinook, coho, and chum salmon populations in Willapa Bay, and the recreational and commercial fishing opportunities in the marine and freshwaters of Willapa Bay.

1. Productive natural-spawning populations that are locally adapted, diverse genetically to maintain adaptability, and occur in densities appropriate for the local environment.
2. Sustainable fishing levels for both recreational and commercial fisheries that maximize harvest opportunities.
3. Hatchery production is set at levels needed for optimized harvest and suitable for maintenance of natural-origin populations.
4. Management actions associated with harvest, hatchery production, and natural- origin escapement adhere to ecosystem-based management principles that consider the risks and benefits to species and habitats within the Willapa Bay system, including vulnerabilities to a changing climate.

Adaptive Management

Each year appropriate data (performance measures; see below) on commercial and recreational harvest, hatchery production, hatchery surplus, and natural- and hatchery- origin escapement into the rivers of Willapa Bay will be collected and evaluated. These data and subsequent analyses must be used to determine if the policy objectives are being achieved. If objectives are not being optimally achieved, harvest and hatchery production levels should be altered, and escapement goals re-evaluated until objectives are optimally achieved. Monitoring, data collection, and data analyses are conducted as part of normal agency operations, and the adaptive management process allows for changes in commercial

and recreational harvest, hatchery production, and natural-origin escapement goals without approval from the Commission.

Guidance

1. Recreational and commercial harvest opportunities in Willapa Bay depend on the availability of hatchery-origin (primarily) and natural-origin adult fish returning to Willapa Bay. Increasing hatchery production from Willapa Bay facilities may increase harvest opportunities but may also decrease production from the natural environment when there is not a robust method to manage the number of hatchery- origin fish that stray to the natural environment. The Department must manage hatchery production and harvest so that the policy objectives are optimally achieved.
2. The Department shall develop performance measures (e.g., proportion of natural spawners that are of hatchery-origin – pHOS) that estimate the consequence of a specific management action (e.g., number of smolts released from a hatchery) with respect to one or more of the policy objectives. This will allow for appropriate monitoring of management actions and facilitate adaptive management, if necessary.
3. The Department shall investigate the feasibility and cost for the design, installation, operation, and maintenance of weirs in the Willapa and Naselle rivers capable of controlling the number of hatchery-origin fish that stray to the natural environment.
4. The Department shall work with partners (including Regional Fishery Enhancement Groups, nonprofit organizations, the public, and Lead Entities) to protect and restore habitat productivity.
5. The Department shall strive to mark all juvenile hatchery-origin Chinook and coho salmon by adipose fin removal and seek funding to improve monitoring and evaluation of chum salmon by internal bone marking or other methods.
6. Hatchery production:
 - a. There can be significant genetic and ecological risks to natural-origin salmon populations that accompany the operation of a salmon hatchery program. There can also be many benefits from well-managed hatchery programs that propagate salmon including the support of sustainable fisheries.
 - b. A Hatchery Management Plan (HMP) shall be developed for each facility in Willapa Bay (Forks Creek, Naselle, and Nemah hatcheries) under the authority of Commissioner Policy C-3624 and each hatchery program shall operate in accordance with the provisions of its HMP.
 - c. Each HMP shall be based on the best available science on the risks of hatchery production on natural-origin salmon and contain the essential elements of operational planning that will control aspects such as broodstock collection, mating protocols, and juvenile rearing and release strategies.
 - d. HMP provisions are to reflect a balance between minimizing genetic and ecological risks to coincident natural-origin populations and providing for the ecological and societal benefits of hatchery propagated salmon.
7. Harvest management:
 - a. State commercial and recreational fisheries will focus on the harvest of abundant hatchery fish. Mark-selective fisheries are a tool that permit the harvest of abundant hatchery fish while reducing impacts on wild stocks needing protection. As a general policy, the Department shall implement mark-selective salmon fisheries, unless the wild populations substantially affected by the fishery are meeting spawner (e.g., escapement goals) and broodstock management objectives. In addition, the Department may

consider avoidance, alternative gears, or other selective fishing concepts along with other management approaches provided they are as or more effective than a mark-selective fishery in achieving spawner and broodstock management objectives. State commercial fisheries directed at species which are forecasted to be below escapement objectives will utilize gear types that provide the most conservation benefit (i.e., tangle nets).

- b. The Department shall work through the Pacific Salmon Commission to promote the conservation of Willapa Bay salmon and, in a manner consistent with the provisions of the Pacific Salmon Treaty, pursue the implementation of fishery management actions necessary to achieve policy objectives.
- c. Within the Pacific Fishery Management Council (Council) process, the Department shall support management measures that promote the attainment of Willapa Bay policy objectives consistent with the Council's Salmon Fishery Management Plan.
- d. The Department shall develop and implement enhanced enforcement strategies to improve compliance with fishing regulations and ensure orderly fisheries when necessary.
- e. North River will be managed as a Wild Salmon Management Zone with no hatchery releases of any species of salmon.
- f. The Department shall conduct Management Strategy Evaluations for stocks to evaluate alternative harvest control rules including, but not limited to, Smsy escapement goals. Until such actions are implemented, the Department shall use the following natural-origin spawner escapement goals as harvest control measures.
 - i. Chinook: 4,353
 - ii. Coho: 13,600
 - iii. Chum: 35,400
- g. Fishery Management:
 - i. Fall Chinook: Fall chinook fisheries shall be managed to achieve a general priority for recreational fisheries, but to provide for meaningful fishing opportunity for both recreational and commercial fisheries. This general priority shall be accomplished with a management intent to provide the first opportunity for directed fall Chinook fishing to the mixed stock recreational fishery in the northern portion of Willapa Bay (Marine Areas 2T and 2U) as well as an opportunity for recreational fisheries in Willapa Bay tributaries. The Willapa Bay mixed-stock recreational fishery will be managed to the extent that it does not preclude Willapa Bay commercial fishing opportunity or tributary recreational fishing opportunity. Commercial fall Chinook salmon targeted fisheries shall be managed in Willapa Bay areas to achieve natural-origin spawning escapement goals for the Willapa and Naselle rivers and a meaningful recreational opportunity for tributary fall Chinook fishing. Tributary recreational fisheries shall be managed to achieve river-specific natural-origin spawning escapement goals and provide meaningful opportunity prior to spawning area closures in a manner consistent with law enforcement concerns and low water situations.

If the number of natural-origin spawners for either the Willapa or Naselle river natural-origin fall Chinook salmon is less than the spawner escapement goal in 3 out of 5 years running, and the preseason forecast is less than 120% of tributary level escapement objectives, the impact rate on

either Willapa and/or Naselle river natural-origin fall Chinook salmon in Willapa Bay fisheries shall not exceed 20%.

Commercial fisheries will be scheduled to avoid conflict with recreational fisheries that primarily occur in the northern portion of Willapa Bay during August and the first half of September.

- ii. Coho: Coho salmon fisheries shall be managed to achieve a general priority for commercial fisheries, but to provide for meaningful fishing opportunity for both recreational and commercial fisheries when run sizes are sufficient to support fisheries. The Willapa Bay commercial fishery will be managed to the extent that it does not preclude Willapa Bay mixed-stock recreational fishing opportunity or tributary recreational fishing opportunity. Commercial coho target fisheries shall be managed in Willapa Bay areas to achieve the aggregate natural-origin spawning escapement goals and recreational opportunity for tributary recreational coho fishing. Tributary recreational fisheries for coho salmon shall be managed to achieve natural-origin spawning escapement goals and provide meaningful opportunity prior to spawning area closures and in a manner consistent with law enforcement concerns and low water situations.

When the pre-season forecast of natural-origin adult Coho is less than the aggregate spawner escapement goal, or the number of natural- origin spawners is less than the spawner escapement goal in 3 out of the last 5 years, fisheries in the Willapa Bay Basin will be scheduled to result in an impact of no more than 10% of the adult return.

- iii. Chum: Chum salmon fisheries shall be managed to achieve a general priority for commercial fisheries, but to provide for meaningful fishing opportunity for both recreational and commercial fisheries when run sizes are sufficient to support fisheries. Commercial and recreational fisheries directed at chum salmon shall be managed to achieve the aggregate spawning escapement goals. The commercial fishery priority shall be accomplished by providing the first opportunity for chum directed fishing to the mixed stock commercial fishery in Willapa Bay, with sufficient escapement to provide a secondary opportunity for recreational fisheries in Willapa Bay tributaries.

When the pre-season forecast of natural-origin adult Chum is less than the aggregate spawner escapement goal, or the number of natural- origin spawners is less than the spawner escapement goal in 3 out of the last 5 years, fisheries in the Willapa Bay Basin will be scheduled to result in an impact of no more than 10% of the adult return.

- h. Planning for Willapa Bay species-specific fisheries shall take into account incidental impacts in fisheries targeting the other species named in this policy and steelhead. The Director shall use their discretion in prioritizing the number of incidental impacts allocated to each species-specific targeted fisheries in Willapa Bay, with a goal of achieving policy objectives.

Delegation of Authority

The Commission delegates the authority to the Director, through the North of Falcon stakeholder consultation process, to set seasons for recreational and commercial fisheries in the Willapa Bay Basin, and to adopt permanent and emergency regulations to implement these fisheries.

This guidance establishes a number of important conservation and allocation principles for the Director and agency staff to apply when managing the fishery resources of Willapa Bay. The Commission fully expects that the Director and agency staff will continue to communicate with the public, and the Commission, to consider new information, evaluate alternate means for carrying out policy objectives, and consider instances in which it may make sense to deviate from the presumptive path forward. That is the nature of both adaptive management, and policy implementation, when faced with a dynamic natural environment.

DRAFT

Summary of Public Comment on the Draft Willapa Bay Salmon Management Policy

Public Comments:

- 10 responses from individuals

- 2 comments from organizations
 - CRCFA/CCF
 - CCA

Main themes included in the public comment:

- Hatchery production numbers should be increased
- Water flow issues not addressed
- Too much commercial harvest
- Chinook predation by pinnipeds
- Policy is harvest-centric
- Enforcement is lacking in WB
- Policy did not have meaningful public comment
- Willapa should have recreational priority
- No “paybacks”
- Purpose statement does not include conservation
- Commission should have more oversight

**Willapa Bay Salmon Management Policy Draft
Public Comments July 5-August 7, 2023**

Online Portal:

- The new draft should give priority to conservation and a selective fishery. Since gill Net licence from the Columbia have been purchased by the state there will be more pressure on the Willapa Bay. Time to make the Willapa Bay a Recreational priority with selective gear. - Bellingham
- i see no where about the water flow of the river! plans, the river was shut down in 2022 for fishing low flow, yet YOU LET THE DAM NETS GET OVER 3000 KINGS AND 42,000 SILVER, THE RIVER SUCKED, i have fished it for 60 years don't tell me how well you are doing!!!!!! - Tacoma
- We used to catch fish in the Willapa where it made it fun, now not so much as we come from Olympia & I have been doing this with my dad who passed in 2007 since I was 5, I am now 73. Please at least make it worth the trip once in a while as my wife & I love the Willapa & all it has to offer. Could say more but now is not the time. - Olympia
- The Willapa managment plan has dropped the number of Forks creek Chinook hatchery plants to an unacceptable number. This was done to attempt to increase the wild Chinook in the north fork of the willapa. The drop in the Chinnok releases from the hatchery and the low returns in Forks creek hatchery has ruined a good sports fishery in the north willapa. From California to Yukon Alaska, Chinook salmon are struggling. We need to return to the larger hatchery releases of Chinook from Forks Creek hatchery. - Aberdeen
- Hello, After reviewing your plan it looks as if the significant issue is to mitigate return of hatchery origin fish impacting the wild fish. However Willapa bay offers a chance for the department to begin strong broodstock efforts to supplement these hatchery fish with wild and in basin genetics instead of managing the fish into a lower number which has not worked on a single other river system. The amount of fish returning is a blessing and installing a weir to prevent strays or other measures will other reduce the number of returning fish of both origin. With the huge number of reduced opportunities it's within the departments mission statement to maintain or increase returns in successful systems. Please do not manage these fish out of existence like other systems from fears of straying fish which would not be a relevant argument if all fish derived from the same genetics. Additionally with sport fishing opportunities reduced so heavily elsewhere to allow for commercial harvest in rivers is a terrible recommendation and paints the writing on the wall that any river that has rebounding salmon numbers will just be delivered to the highest payer, commercial fisherman who see the least amount of restrictions offshore. Thank you. - Portland
- For the last 3 years that I have fished recreationally in the Nemah and Naselle tributary, the majority of the kings caught have seal/ sealion bite marks. I can't imaging how many kings have fallen predation to pinnipeds in the estuary. What has been done to account for the loss of salmon at a vulnerable stage in their migration? Also, I believe there are too many commercial fishing days open. They are fishing too close to the river mouths thereby wiping out entire runs of fish. - Gig Harbor

Emails:

8/7/2023

For my comments on the policy:

Willapa Bay WB) Fisheries success boil down to your / WDFW Commissioner's and manager's positions on Hatcheries, hatchery management, their success and how they can play a role in conservation supporting Natural Origin adult returns.

New good hatchery management policies have been adopted by your Tribal partners and Grant Co. PUD Priest Rapids hatchery and a few others with great success.

Thanks

Larry Pryor, chairman

8/4/2023

Commissioners:

Thank you for the opportunity to comment on the draft version of the Willapa Bay Policy developed by WDFW.

Since 2015 when the current policy was developed the commission has evolved with new members and there have been a couple of new directors as well. I would not expect that there is much institutional memory for the conditions behind the current Willapa Bay Management Policy.

The current policy had expectations for meeting goals and accomplishments. The wording in the new policy has nice sounding words but is short on accomplishing anything and certainly eliminates any accountability for ignoring the policy. A specific example of ignoring the current policy and rendering it meaningless in the draft policy is the enhanced enforcement requirement.

Item number 7 in the current policy states: "Monitoring, sampling, and enforcement programs will adequately account for species and population impacts (landed catch and incidental fishing mortality) of all recreational and commercial fisheries and ensure compliance with state regulations. Develop and implement enhanced enforcement strategies to improve compliance with fishing regulations and ensure orderly fisheries." I requested a copy of the enhanced enforcement strategy and learned that no strategy was developed. The Willapa manager pointed out to me that the policy did not require producing documentation.

The policy guideline was the result of little enforcement of commercial regulations prior to the policy. In 2014, before the current policy, there were only two citations issued to commercial fishermen in Willapa Bay and the Willapa River and they were to the same fisherman. In the

eight years from 2015 through 2022 there have been a total of three citations and one warning. In the current years of 2021 and 2022 there were no citations issued for commercial fishermen fishing Willapa Bay or the Willapa River despite being informed of numerous violations of the WAC. These eight years are the period where the current policy called for developing an enhanced enforcement strategy. Enforcement has gone from minimal to negligible.

WAC 220 354 010(1) states: "It is unlawful to operate in any river, stream or channel any gillnet gear longer than three-fourths the width of the stream; this provision shall supersede all other regulations in conflict with it." The length of the gill net gear is the straight line length of the cork line. This WAC is routinely violated in the Willapa River with fishers deploying 50-100 percent excess gear as shown in the attached photograph. These violations have been reported to enforcement with photos for the last four years. No citations for violating this WAC have been issued since the one in 2013. In the past, the few times officers boarded a boat for observable violations they often found illegal fish on board indicating that more enforcement is necessary.

The new policy draft uses nearly the same enforcement strategy language in item 7d but it adds the words "when necessary" at the end. You can be sure enforcement will never find it necessary to develop an enhanced enforcement strategy with this wording. The wording makes it so no one can ever be held accountable for ignoring this policy guidance. I am asking the commission to consider removing the words "as necessary" and adding the word document so that the policy reads: "The Department shall develop, **document**, and implement enforcement strategies to improve compliance with fishing regulations and ensure orderly fisheries. ~~when necessary.~~" It would also be useful to add back the missing statement about ensuring compliance with state regulations.

Due to changes in the people on the commission I suspect that the commission has never held a director accountable to follow the existing policy. I also doubt that the current director has ever held his staff accountable for ignoring the current policy. If you make the changes suggested, you should follow up in a year and review the enhanced enforcement strategy to see if it exists or is followed.——

John Campbell

7/24/2023

The proposed new policy is unacceptable for conservation and recreational fishing reasons. A summary would include;

1. It removes public involvement in key decision making. It is a clear work-around against HSRG, which is best available science.
2. " Interim guidance" issued repeatedly since 2015 has rendered the current policy and its legitimate goals unattainable. These goals were generated through intensive, well informed public comment and based on HSRG (Best Available science) as confirmed by WDFW Dr Warheit.
3. Under proposed policy, Basin rivers would no longer be designated as to conservation priority, ie Primary, Secondary, and Stabilizing, with Escapement Wild Chinook goals set accordingly. As the only recreational priority, this is a problem.

4. Millions of Hatchery production could be moved around at will, without scientific backing, public knowledge, or Commission approval. Habitat carrying capacity must include the Willapa Estuary, as was recommended by the Governor's Orca Task Force.

5. The existing clear requirement for Department to push PFMC for return of Willapa Basin Salmon would be weakened by the meaningless phrase of proposed policy. Currently Chinook Wild Escapement never comes close to even entering the estuary.

6. Unlike existing policy, proposed policy has not had meaningful, if any, non commercial or public conservation input.

7. The proposal is merely harvest centric. Put and take wherever Department alone sees fit. Removal of Commission from this process would remove the last vestige of public involvement. The current policy, public and scientific (HSRG)involvement, was motivated by a lawsuit.

8. Enforcement of gillnet gear rules continues to be neglected even in downtown South Bend in Willapa River, the Primary Wild Chinook river! In front of the public. At the same time proposal closes most Naselle river fresh water to the only sport priority Chinook. Enforcement must become part of the solution, not part of the problem. All fresh water below Naselle Hatchery must be open to sport fishing, with enforcement doing its part as appropriate.

In summary, the well conceived existing policy involved much public input. The original policy as modified incessantly by unreviewed " interim measures" had no chance. It must be kept in place. The Commission can delegate authority, not its responsibility. Use of current policy as merely a bait and switch place holder followed by no more need for disastrous interim measures on a new bare bones one would be just a bigger disaster.

A recovery plan to be approved and monitored by the Commission seems to be in order. pHOS is at the top of the list. We suggest a three year plan with six month progress reports to the Commission. Commission should be aware that for Naselle Chinook pHOS will not be resolved by the new proposed Weir. Many spawn below the Weir. A Senior Citizens Hole below Naselle Weir, as below Nemah Hatchery, would help pHOS, and eliminate the waste of up to 18,000 early Hatchery Coho because sport fishing is closed in most of fresh water as they pass. Detailed relevant science -based information on our Basin can be found in our WBERT Reports. We have received no response for years.

Thanks for your kind attention, Ross P. Barkhurst, South Bend, WA

7/12/2023

Ms. Wagner, Others

I emailed to commissioners last week, please see below, reference Willapa Bay (WB) recreational fishery, to get started in 2023 with egg take FC- before to late.

I'll add that 2023 should be a decent year for fall chinook returns to Forks Creek (FC) hatchery and the bay recreational fishery, as noted below the FC 2020 2,628,497 releases, should be able to meet a much larger egg take this year, from both N.O. and hatchery chinook returns, and the message to the hatchery managers

As you can see in this and my past emails and reports, Severe Decline, Hatchery SARs, increasing FC releases- I can resend if needed- see attached Hatchery SARs from May.

In my perspective to improve the WB recreational fishery, increasing FC hatchery releases is a top concern, but as important is to improve the WB hatchery's successes, their adult returns and SARs/ Smolt to Adult Returns, these three hatcheries SARs are not good for fall chinook.

In contrast, the managers have put substantial effort in the last few years in their Coho programs, and last year Coho SARs were substantial, FC had a 8-9% to hatchery- not including harvest, but the other two WB hatcheries were not as successful but much better than Chinook SARs. These same SAR

improvements can be seen in Fall Chinook. Once the hatcheries are successful then adaptive management should be able to adjust for WB complimentary SARs and improve N.O. returns

Thanks for your efforts.
Larry Pryor

7/12/2023

- The below three bullets are related to me trying to grasp what "adaptive management" actually means in application. Conceptually it sounds great but it's concerning that the commissioners did not seem to be able to describe it accurately.
 - It's concerning that the department is shifting to a policy that is not created yet...Cart before the horse.
 - It's concerning that the department is looking to adopt a policy and get feedback from the public, in which the details of the policy are not available or not known.
 - It feels like the public is being asked to accept adaptive management of the hatcheries without the policy of adaptive management being defined.
- Love to hear the support for integrated hatchery programs discussion! I think that approach is easier for the public to understand and may be scientifically sound as well.
- Why is there so much pushback on keeping the commercial fisheries out of 2T and 2U til September 16th?
 - It's been that way since 2015 and I don't recall it causing problems?

Brandon

7/7/2023

Commissioners,

Hello again, I see on app.powerbigov.us/ there are Willapa Bay (WB) policy reviews Aug. 10-12 and then Sept. 28- 30 here in Yakima.

If the commission's hope is to improve the Willapa Bay Recreational fishery and is in favor of increasing Forks Creek releases, it would be a benefit to let the WB hatchery managers know soon and before hatchery returns so they can adjust brood and egg take for 2023/ releases in 2024 for adult returns in 2027.

The Hatcheries in Willapa Bay start collecting Fall Chinook Brood in September to November
Naselle Hatchery returns generally start mid-September, and peak in mid to late October
Nemah Hatchery returns generally begin a bit later - late September, peak mid to late October
Forks Creek returns have been much later- late October, peaks in mid to Late November,

Returns in WB are impacted by rain and river water flows. If there are early rains that would raise river levels, especially Willapa River/ Forks Creek to above 200 ft³/s then Salmon returns to hatcheries will move in earlier, though the last few years this has not been the case, but if?

I and other fisherman hope that Forks Creek hatchery production can be moved back to the pre-2015 policy and work at improving their SARs / Adult Returns this year then adaptively manage.

Forks Creek releases have impacted the Willapa Bay Recreational fishery and the reduced releases directly relate to the WB recreational fishery's severe decline!

I'd like to remind you of my previous report and comments (Jan. 2023) on WB recreational fishery's severe decline.

Releasing fall chinook from the southern WB hatcheries does not affect the WB recreational fisheries, only commercial catch- in 2019 WB hatcheries released 6,284,214 fall chinook, 374,500 from Forks Creek, 3,342,000 from Nemah, and 2,567,614 from Naselle hatcheries, But the WB recreational fishery decline in 2022 was the worst it had ever been and the information I provided clearly showed the constant decline since the 2015 policy.

We should see a better WB recreational fishery this year as in 2020 Forks Creek released 2,628,497 million fry - (this should be the year they start returning, and Forks Creek Hatchery has had the best SARs (still not good but best of the three Willapa hatcheries)), in 2021 FC decreased releases were back to 607,338 and 458,072 in 2022 and I expect 2024/ 2025 fishery to be back to bad!

Your meeting time frame does not seem to help improve the recreational fishery- for quite some time-

For Fall chinook at the current release sizes of 6 grams/ 80fpp- from the previous year's brood, which is currently the practice in WB, there is generally a 3 + years average cycle from release, 4 years from brood/ spawn to adult returns depending on broodstock, husbandry, and spawn management. there are +- age returns too.

If they can get started this year with brood/ spawn, egg takes, we might see a successful 2027 recreational fishery in WB, Otherwise, you kick the can down the road another year again to 2028 or not at all.

Thank you again for your consideration.

Respectfully submitted.
Larry Pryor
Concerned WB fisherman

7/5/2023
Marlene

Initiating a new salmon management plan with a public comment period open when the majority of fishermen that fish Bristol Bay in JULY is highly problematic and eliminates comments from those that depend on the Willapa Bay for a good portion of their living.

I've addressed this HUGE PROBLEM with the WFWC on prior occasions to ensure a public comment period when the fleet has realistic time to reply to open public comment periods and evidently to NO avail as this keeps coming up where the fishing fleet is disqualified from participation in the public process and is an illicit process designed to eliminate those most impacted by the change in fisheries management whether these changes are either positive or negative for the fishing fleet.

CCF/CRCFA strongly OBJECTS to making a public process a sham for the fishing fleet that is unable to realistically participate in this public process that will probably have a negative impact on their fishery.

This public process MUST receive at least a 45 day extension which will put off the WFWC decision point in August.

Please share this email objection & suggestion for a 45 Day public comment period extension until the fleet gets back from Alaska fishing and has adequate time to respond. Some of these fishermen may go tuna fishing when they get back from Alaska and 45 days may not be enough time to adequately respond to this management adjustment.

Concerned for the lack of ACCESS for those most impacted by this management process,

Dale Beasley, President CRCFA/CCF



Coastal Conservation Association

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August 3, 2023

Barbara Baker, Chair
 Washington Fish and Wildlife Commission
 PO Box 43200
 Olympia, WA 98501

Chair Baker and Commissioners:

Thank you for the opportunity to outline comments and concerns related to the Commission's draft Willapa Bay Salmon Management Policy. Coastal Conservation Association (CCA) Washington was actively engaged in the development of the current Willapa Bay Salmon Management Policy (C-3622), which included safeguards to reverse years of overharvest and provided clear management directives to promote conservation, recovery, and selective recreational fishing opportunity. The Commission's draft policy omits many of these key provisions and fails to consider the implications of the \$14.4 million gillnet buyback.

C-3622 was developed following years of overharvest of wild Willapa Bay salmon stocks in non-selective commercial gillnet fisheries, resulting in chronic missed escapement targets. Industrial non-selective gillnet fisheries were taking nearly 90% of harvestable salmon returning to Willapa, harming wild salmon stocks, severely constraining selective recreational fisheries, and eroding public trust in WDFW's management.

The purpose statement for C-3622 articulates a clear commitment to the conservation and recovery of wild salmon and actions to increase transparency in WDFW's management:

"The objective of this policy is to achieve the conservation and restoration of wild salmon in Willapa Bay and avoid ESA designation of any salmon species. Where consistent with this conservation objective, the policy also seeks to maintain or enhance the economic well-being and stability of the commercial and recreational fishing industry in the state, provide the public with outdoor recreational experiences, and an appropriate distribution of fishing opportunities throughout the Willapa Bay Basin. Enhanced transparency, information sharing, and improved technical rigor of fishery management are needed to restore and maintain public trust and support for management of Willapa Bay salmon fisheries."

Compare this to the purpose statement in the Commission's draft policy, which includes no references to conservation or the recovery of wild salmon:

"The purpose of this Policy is to set management objectives and to provide management guidance for natural (in-river) and hatchery production, and recreational and commercial harvest of fall Chinook, coho, and chum salmon populations in Willapa Bay."

Maintain and Mandate Adherence to Conservation Safeguards

C-3622 was developed with extensive public involvement and scientific modeling to identify conservation standards necessary to rebuild Willapa Bay wild salmon populations over a two-decade period. This included an eventual 14% exploitation rate limit for wild Chinook, as well as escapement goals for Coho and Chum salmon. C-3622 also includes a “payback” provision to ensure that harvest overages were paid back the next year through harvest rate reductions. Unfortunately, WDFW frequently failed to meet these standards, including never attempting to implement the 14% exploitation limit for Chinook.

Consistent with WDFW’s paramount mandate to “preserve, protect, and perpetuate”, we urge the Commission to maintain these critical conservation safeguards and mandate adherence through a “payback” the following year or other accountability mechanisms when standards are not met. Instead, the Commission’s draft policy includes aggregate (hatchery and wild) escapement goals for Chinook, Coho, and Chum. Aggregated escapement goals are insufficient to ensure the conservation and recovery of wild salmon populations.

Maintain Recreational Priority for Chinook, Mandate Selective Harvest

C-3622 also sought to bring greater equity in harvest sharing and fishing opportunity to recreational fisheries after decades of intensive non-selective commercial gillnetting. Unfortunately, the Commission’s draft policy significantly weakens the recreational priority for Chinook for both marine and freshwater fisheries. We ask that you maintain C-3622’s restrictions on the gillnet fishery: A) in areas 2T and 2U prior to September 16 and B) in areas 2M, 2N, 2P, and 2R before September 7. These restrictions are critical in achieving a recreational priority for both marine (2T, 2U) and freshwater areas (2M, 2N, 2P, and 2R), as well as meeting escapement and hatchery egg take objectives.

C-3622 and the Commission’s draft policy both identify the need to implement selective harvest practices to increase the escapement of wild salmon populations and harvest surplus hatchery salmon to reduce genetic and ecological risks to wild salmon populations. After decades of experience, including recent years under C-3622, it is clear that non-selective gillnets are completely ill-suited for this task. Recent commitments to implement effective weirs on the Willapa and Naselle rivers have also failed to materialize.

The most effective tool for selectively harvesting hatchery salmon remains mark-selective recreational fisheries – both marine and freshwater. Instead of truly prioritizing this conservation tool, the Commission’s draft policy weakens an already limited recreational fishery, gives WDFW discretion to significantly expand gillnetting, and relies on commitments to implement weirs that are highly uncertain to occur. We urge the Commission to maintain and expand the priority for mark-selective recreational fisheries for both marine and freshwater fisheries. We also urge the Commission to prohibit the retention of wild Chinook in Willapa Bay commercial fisheries.

Reduce Gillnetting Commensurate with Retired Licenses

Before adopting a new Willapa policy, we ask that the Commission request WDFW to disclose the Willapa Bay salmon landings associated with the 129 Willapa Bay-Columbia River gillnet licenses that were recently retired through the \$14.4 million taxpayer funded gillnet buyback. Based on a Public Records Request, we know that 87% of the Columbia River pre-buyback gillnet salmon landings were made by licenses that have been retired. It is likely that a significant share of the Willapa Bay pre-buyback gillnet salmon landings are also tied to licenses that have been retired. This information is critical as the Commission considers how to provide recreational and commercial fishing opportunities

and meet conservation objectives for Willapa Bay wild salmon populations. Taxpayers made a significant investment in the buyback and the Commission's Willapa policy should direct WDFW to re-allocate the landings association with the retired licenses to mark-selective fisheries.

Hatchery Production and Best Available Science

CCA supports restoring Chinook hatchery production to all three major river systems in Willapa Bay. As noted above, mark-selective recreational fisheries can more effectively and efficiently harvest returning hatchery Chinook by maximizing the value of the allowable exploitation rate limits for wild Chinook.

CCA supports the development of Hatchery Management Plans (HMP) for each hatchery program that are based on the best available science and includes protocols that "reflect a balance between minimizing genetic and ecological risks to coincident natural-origin populations." We believe such protocols are necessary to avoid an ESA listing for Willapa Bay Chinook, which would severely constrain harvest opportunities and hatchery production.

Reducing Harvest in Ocean Fisheries

C-3622 and the Commission's draft policy direct WDFW to work with the Pacific Salmon Commission and the Pacific Fisheries Management Council to pursue fishery management measures for northern (BC/AK) and southern (WA) fisheries needed to achieve conservation goals for Willapa Bay salmon populations. Insufficient progress has been made in recent years to reduce exploitation rates of Willapa Bay salmon populations in ocean fisheries stretching from Alaska to Washington.

We believe the Willapa Bay salmon management policy should require reporting on exploitation rates of Willapa Bay salmon populations from northern and southern ocean fisheries, the levels needed to meet conservation and recovery objectives, and specific actions being taken by WDFW to advocate for harvest reductions of Willapa Bay wild Chinook in ocean fisheries.

Public Involvement, Oversight, Transparency, and Enforcement

There was significant public involvement in the development of C-3622 and WDFW's management of Willapa Bay salmon fisheries through a Willapa Bay Salmon Advisory Group. That group was disbanded by WDFW in 2020 and public engagement in the management of Willapa Bay salmon fisheries has suffered. Any commission policy should require a formal and robust framework for public involvement and increased transparency into commercial and recreational harvests, hatchery production levels, and escapement goals.

We are concerned that the Adaptive Management section in the Commission's proposed policy provides WDFW wide latitude to unilaterally make "changes in commercial and recreational harvest, hatchery production, and natural-origin escapement goals without approval from the Commission." The Commission should maintain a formal role in providing oversight and approval of WDFW's management of Willapa Bay salmon fisheries.

There is also a significant need for increased monitoring and enforcement of Willapa Bay salmon fisheries. We urge WDFW to utilize funding provided by the Legislature to increase enforcement efforts of existing fishing regulations, including gear restrictions for gillnet fisheries. Current enforcement of fishing regulations is insufficient and further erodes public confidence in WDFW's management.

Summary of Recommendations

We ask that you consider the following recommendations for incorporation into the draft policy or as changes to C-3622:

- Provide clear policy language establishing the conservation and recovery of wild salmon populations as a key component of the Willapa Bay Salmon Management Policy.
- Maintain and mandate adherence to key fishery conservation safeguards based on the conservation and recovery needs of wild Willapa Bay salmon populations, including exploitation rate limits for fisheries, science-based escapement goals, and “payback” provisions to ensure adherence.
- Retain a strong priority for recreational Chinook fisheries in marine and freshwater fisheries, including C-3622’s seasonal restrictions on gillnet fisheries.
- Prioritize and mandate mark-selective fisheries to meet conservation objectives, including the harvest of hatchery fish. Prohibit the retention of wild Chinook salmon in all fisheries.
- Reduce gillnetting commensurate with the landings associated with the 129 Willapa Bay gillnet licenses that were retired through the \$14.4 million taxpayer funded buyback program.
- Restore hatchery Chinook production to all three Willapa River systems.
- Advocate for reductions in harvest of Willapa Bay wild salmon populations in ocean fisheries from Alaska to Washington.
- Improve public involvement, transparency, and commission oversight in WDFW’s management of Willapa Bay salmon fisheries.
- Mandate and fund increased monitoring and enforcement of fishing regulations in Willapa Bay salmon fisheries.

Thank you for the opportunity to comment on this important policy.

Sincerely,



Nello Picinich, Executive Director
CCA Washington