



Lake Washington/Cedar/Sammamish (WRIA 8) Watershed

201 S. Jackson Street, Suite 600
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October 17, 2019

Subject: Comments on House Bill 1579 – Proposed Rule Change to Remove Harvest Limits for Bass, Walleye, and Channel Catfish in Anadromous Waters of the State

Dear Washington Department of Fish and Wildlife,

Thank you for the opportunity to comment in support of the proposed rule change to eliminate harvest restrictions for bass, walleye, and channel catfish in all anadromous waters of the state. This comment letter is being provided on behalf of the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Technical Committee. We are the science body that oversees implementation of the technical components of the *WRIA 8 Chinook Salmon Conservation Plan* (WRIA 8 Plan) and are responsible for recommending habitat goals and recovery actions that will lead to long-term, sustainable Chinook salmon runs in our watershed. The WRIA 8 Plan was approved and ratified in 2005 by elected officials from 28 local governments, was approved by NOAA in 2007 as a component of the *Puget Sound Salmon Recovery Plan*, and was updated and again approved by local government partners in 2017. Although Chinook salmon are our primary focus, many of our objectives are intended to benefit other salmonids, including sockeye, kokanee, and coho.

The WRIA 8 Plan identifies predation by piscivorous fish as a primary limiting factor for salmon recovery. We applaud the proposed rule change and welcome efforts to reduce the impacts of nonnative warmwater predators in areas with ESA listed and at-risk salmonid populations.

Monitoring studies in WRIA 8 suggest a primary bottleneck to salmon productivity is occurring as juvenile salmonids journey from their natal systems through Lakes Sammamish and Washington and the Lake Washington Ship Canal (LWSC) to the Ballard Locks. For example, PIT tag data from 60,972 juvenile Chinook migrating out the Cedar River and Bear Creek systems over the past 20 years (2000-2019) show an average detection rate of just 17% at the Ballard Locks. Over the past 5 years, the average detection rate has declined to 9 and 11% of juveniles from the Cedar River and Bear Creek, respectively (P. Lisi, personal communication). While not adequately quantified, predation by piscivorous fish appears to be a key constraint on smolt survival.

In critical areas for smolt rearing and migration, human-caused alterations in habitat conditions have benefitted nonnative warmwater piscivores resulting in increased abundance of these predators relative to historical conditions. Given measured trends of increasing water temperatures in the Lake Washington basin (King County 2007), there may be greater predation risk over time with increased fish metabolic demands. Assessments of predation rates in the Lake Washington basin conducted in 1999, 2016, and 2018 suggest smallmouth bass exhibit higher predation rates on salmon than other nonnative piscivorous species averaging 20% (n = 163, Lake Washington, spring) to 50% (n = 508, LWSC, spring-early summer) of the 1999 diet, all of the 2016 diet (n = 3, LWSC), and a quarter of the 2018 diet (n = 45, LWSC) comprised of salmonids. Largemouth bass and yellow perch were also found to consume salmonids, whereas walleye and channel catfish were not tested (Tabor et al. 2007, Tabor and Williams 2019).

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Finally, while we support the proposed rule change, we also recognize existing social and scientific uncertainty regarding the magnitude and extent of predation risks, as well as the potential effectiveness of liberalized harvest limits in benefitting Chinook recovery goals. Given the urgency of the salmon conservation challenge, there is an imminent need to implement recovery actions, to learn from implemented actions, and to turn new knowledge into more effective actions. We urge the Washington Department of Fish and Wildlife to implement the proposed rule change, and do so within a monitoring and adaptive management framework. Associated monitoring is needed to track whether elimination of harvest limits has a measurable effect on piscivore abundance and size structure during the smolt out-migration period and to determine whether the rule change results in reduced predation risk and improved salmonid smolt survival as hypothesized.

Thank you again for the opportunity to comment on the proposed rule change. If you have questions about these comments or the implementation of the WRIA 8 Plan, please contact Jason Mulvihill-Kuntz, WRIA 8 Salmon Recovery Manager, at 206-477-4780 or jason.mulvihill-kuntz@kingcounty.gov.

Sincerely,



Lauren Urgenson
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Cc: Jason Mulvihill-Kuntz, WRIA 8 Salmon Recovery Manager
WRIA 8 Salmon Recovery Council members

References:

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Tabor, R. A., B. A. Footen, K. L. Fresh, M. T. Celedonia, F. Mejia, D. L. Low, and L. Park. 2007. Smallmouth bass and largemouth bass predation on juvenile Chinook salmon and other salmonids in the Lake Washington basin. *North American Journal of Fisheries Management* 27: 1174-1188.

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