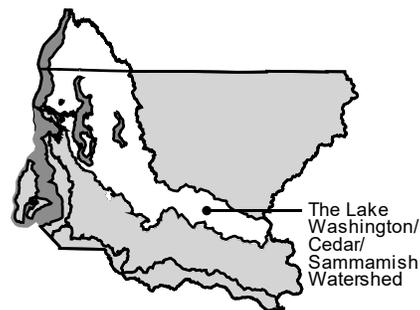




November 19, 2021



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

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

Dear Chair Carpenter,

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

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

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

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

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

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

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

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

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

Sincerely,

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

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

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