



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northwest Region
7600 Sand Point Way N.E., Bldg. 1
Seattle, WA 98115

November 1, 2012

Phil Anderson, Director
Washington State Department of Fish and Wildlife
600 Capitol Way N.
Olympia, Washington 98501-1091

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Dear Mr. Anderson:

OFFICE OF THE DIRECTOR

The National Marine Fisheries Service (NMFS) supports removing all size and bag limits for bass, walleye and channel catfish in the Columbia River, Snake River and tributaries as described in Option 1 of rule change number 9 of the Washington Department of Fish and Wildlife's (WDFW) 2012-2013 proposed sport-fishing rule changes. While it is difficult to quantify the magnitude of predation by these species on salmon and steelhead listed under the Endangered Species Act (ESA), predation by these species was noted as an increasing threat in NMFS' recent 5-year ESA status reviews. The extent to which a regulation change will affect the harvest of these species and thereby reduce predation rates on at-risk salmon and steelhead populations is uncertain, but the change described in Option 1 would send a clear message that WDFW is taking this threat seriously.

Adopting Option 2, however, would imply a desire by WDFW to maintain healthy populations of large, non-native predators. We are concerned that Option 2 would allow the continued loss of significant numbers of salmon and steelhead from threatened and endangered populations, and also from non-listed populations that the region has spent billions of dollars to enhance.

The NMFS believes Option 1 sends an unambiguous message to fishery managers, anglers, stakeholders, and the general public regarding WDFW's management objectives where these non-native predators significantly overlap with salmon and steelhead populations. The proposed rule change under Option 1 will affirm the threat posed by bass, walleye, and channel catfish and strengthen the available regulatory mechanisms to control their abundance and distribution in the Columbia Basin. Thank you for taking this threat seriously and for considering our input on this important matter.

Sincerely,

William W. Stelle, Jr.
Regional Administrator

cc: Bob Turner, Donna Darm, Peter Dygert - NMFS/NWR
Ed Bowles, Bruce McIntosh - Oregon Department of Fish and Wildlife

