



Wild Fish Conservancy

N O R T H W E S T

S C I E N C E E D U C A T I O N A D V O C A C Y

July 28, 2020

WA Fish and Wildlife Commission

Post Office Box 43200

Olympia, WA 98504-3200

Delivered electronically to Commissioners

Re: Proposed changes to Fish and Wildlife Commission Policy c-3619

Introduction

On June 15th, 2018 the Washington Fish and Wildlife Commission (FWC) directed the WA Department of Fish and Wildlife (WDFW) to initiate a review of all sections and aspects of the Hatchery and Fishery Reform Policy (C-3619), including a review of the latest scientific information related to hatcheries and the performance results since the policy was adopted. The Commission-mandated C-3619 review also required changing the language tone about the “positive value of hatchery programs.”

Simultaneously, the Commission suspended the former C-3619 policy guidelines #1-3 which read:

1. Use the principles, standards, and recommendations of the Hatchery Scientific Review Group (HSRG) to guide the management of hatcheries operated by the Department. In particular, promote the achievement of hatchery goals through adaptive management based on a structured monitoring, evaluation, and research program.
2. The Department will prioritize and implement improved broodstock management (including selective removal of hatchery fish) to reduce the genetic and ecological impacts of hatchery fish and improve the fitness and viability of natural production working toward a goal of achieving the HSRG broodstock standards for 100% of the hatchery programs by 2015.
3. Develop watershed-specific action plans that systematically implement hatchery reform as part of a comprehensive, integrated (All-H) strategy for meeting conservation and

harvest goals at the watershed and Evolutionarily Significant Unit (ESU)/Distinct Population Segment (DPS) levels. Action Plans will include development of stock (watershed) specific population designations and application of HSRG broodstock management standards. In addition, plans will include a time-line for implementation, strategies for funding, estimated costs including updates to cost figures each biennium.

Given the fundamental significance of policy C-3619 for long-standing wild fish recovery efforts within the state of Washington and beyond, the Wild Fish Conservancy (WFC) is concerned that the Fish and Wildlife Commission is abandoning science-based fishery and hatchery reform without justification and contrary to best available science, and that the public process on hatchery and fishery reform policy is being conducted in an exclusive and opaque manner.

Background

The stated purpose of the *current* WDFW Hatchery and Fishery Reform Policy (C-3619) is “to advance the conservation and recovery of wild salmon and steelhead by promoting and guiding the implementation of hatchery reform.” This policy is fundamental to WDFW’s commitment to science-based hatchery and fishery management policies that aid wild fish recovery objectives designed to support long-term sustainable tribal, commercial, and recreational fisheries goals. The guidelines within the current C-3619 also reflect and inform science-based management commitments made throughout the state in regional salmon and steelhead recovery plans, federal Endangered Species Act recovery plans, Hatchery Genetic Management Plans, Fishery Management Plans, the Statewide Steelhead Management Plan, and other state policies. While viewed as inconvenient in the short-term by some, science-based hatchery and fishery management policies are critical for protecting and recovering the abundance, productivity, diversity, and spatial structure of Washington’s wild salmon and steelhead. These population characteristics provide wild salmon and steelhead - and the hundreds of species which rely on them - with the resilience necessary to survive current and future climate-induced habitat impacts.

Since the FWC’s C-3619 review began in June 2018, the Wild Fish Conservancy and others have expressed considerable concern, both in writing and in oral testimony at Commission and Committee meetings, regarding the direction and administration of the policy review process. A WFC public disclosure request (PRR No. 20122) likewise documents apprehension within the WDFW Science Division caused by the FWC’s suspension of key tenants of C-3619 and the FWC’s apparent willingness to abandon the science-based conservation and recovery emphasis in the existing policy. Representative letters from similarly concerned former Fish and Wildlife Commissioners, and other Pacific Northwest fishery scientists, can be reviewed in the attachments below.

Consistency with the Science

Review of Hatchery Reform Science in Washington State (2020)

As directed by the FWC through the C-3619 review process, WDFW and the Washington State Academy of Sciences conducted a Review of Hatchery Reform Science in Washington State (2020) to identify advances in hatchery reform science that have occurred since C-3619 was adopted in 2009. This thorough WDFW-produced and independently-reviewed report provides the following key conclusions which appear to be contraindicated in the current C-3619 policy revisions being considered by the FWC:

1. The HSRG principles of reducing pHOS and increasing pNOB to achieve fitness gains in wild populations are well-founded, and should be fundamental goals in any hatchery reform management action.
2. Excessive hatchery program size requires more careful scrutiny and scientific justification because it affects virtually every aspect of hatchery risks.
3. Hatcheries have potential for large magnitude ecological impacts on natural populations that are not well understood, not typically evaluated and not measured
4. Hatchery risks include fishery risks, ecological risks and genetic risks. Fisheries targeting abundant hatchery runs can unintentionally increase mortality of co-mingled natural populations.
5. Research on ecological [HxW] interactions lags far behind the attention devoted to genetic risks of hatcheries. Importantly, research suggests the potential for ecological interactions in marine environments shared between multiple hatchery and natural populations, yet very little is known about the likelihood or magnitude of population-scale ecological impacts of hatcheries.”
6. Studies comparing the number of offspring produced by hatchery-origin fish and natural-origin fish when both groups spawn in the wild (relative reproductive success, RRS) have demonstrated a general pattern of lower reproductive success of hatchery-origin fish.
7. In WDFW’s hatchery system, a focus on efficiency and maximizing abundance prevents widespread implementation of risk reduction measures.
8. We recommend a more rigorous, consistent and intentional evaluation of cumulative hatchery effects across multiple hatchery programs operating within a geographic region.”
9. WDFW invests considerable effort into population monitoring, yet this information does not often achieve its potential as a hatchery evaluation tool because analysis, reporting, and synthesis are typically underfunded. Furthermore, for many hatchery programs, the absence of a clear framework for application of monitoring data in decision making precludes clearly articulated risk tolerance thresholds.”

The new C-3619 policy direction the Commission is considering eliminates fundamental HSRG science guidelines and, ironically, is contrary to the conclusions of the hatchery science review conducted by WDFW and the WA Academy of Natural Sciences as part of the C-3619 policy review process. It contradicts science-based commitments and recommendations in federal Endangered Species Act recovery plans, regional salmon recovery plans, and hatchery genetic management plans. It undermines the public's substantial investments in wild salmon and steelhead recovery efforts, and therefore Orca recovery efforts. In reviewing the draft C-3619 rewrite (June 2020) we are left with the distinct impression that some Commissioners are committed to increasing hatchery production in Washington in an effort to provide short-term increases in fishing opportunities, no matter the negative consequences to massive ongoing science-based efforts to recover wild fish to levels that will support sustainable fishing practices well into the future.

Draft WDFW Hatchery and Fishery Reform Policy Implementation Assessment (2020)

As directed by the FWC through the C-3619 review process, WDFW also conducted a hatchery and Fishery Reform Policy Implementation Assessment (2020) to address the apparent FWC question: “we’ve used hatchery reform science for ten years now – how well is it working to achieve wild fish recovery?” However, for reasons described in the report beginning on page 3, WDFW found the data necessary to answer that question were unavailable or insufficient to the task. Consequently, WDFW re-focused their assessment to evaluate whether and to what extent the agency had actually implemented the fishery and hatchery reform actions mandated in the 2009 policy C-3619. Among the many findings in this report, these WDFW conclusions are particularly relevant to our concerns related to the proposed FWC revisions to C-3619: A lack of funding was a common reason that prevented implementation of some guidelines; a lack of comprehensive statewide monitoring and evaluation program are areas of special concern; and defining program success and collecting and analyzing data to adaptively manage our programs are critical missing components.

The tenets of C-3619, including the HSRG recommendations identified in the first three suspended guidelines, have not been found inadequate or inappropriate. They conform to the best available hatchery reform science as determined by WDFW and the WA Academy of Natural Sciences in 2020. What is lacking is the leadership and capacity for WDFW’s effective implementation of the state’s Hatchery and Fishery Reform Policy C-3619.

Public Process

The Stakeholder Interview Summary commissioned as part of the C-3619 review process noted that the majority of individuals interviewed agreed that any changes to the Policy must be based on the best available science (Triangle Associates, 2019). The Hatchery Science Review Group started their work in the face of Federal Endangered Species Act listings in 1999, and has been

actively updating their guidelines in reports to congress ever since. Given the long-term implications for the statewide hatchery and fishery reform policy, any proposed departure from the HSRG guidelines should coincide with a robust public involvement process.

Intentionally or otherwise, this opportunity for public input has been lacking. C-3619 public engagement materials previously available on the WDFW hatchery and fishery reform policy review website no longer appear during internet searches. Since December of 2019 meeting agendas, presentations, limited stakeholder assessments, science review reports, and other important files have been removed. Draft Policy documents have not been made available until hours before opportunities for public testimony, and there have been several last minute formal decisions moving this policy review forward that were inadequately represented on agendas. These problems were noted in engagement reports produced by Triangle Associates in April of 2019, and have only worsened over time.

There should be ample time and opportunity for the public, especially those organizations directly involved in salmon recovery efforts informed by C-3619, to weigh in on each proposed change. These communities include the 29 sovereign tribal nations, 25 Salmon Recovery Funding Board lead entities, 14 regional fisheries enhancement groups, 7 regional salmon recovery organizations, 45 conservation districts, the Puget Sound Partnership and ten associated Local Integrating Organizations, non-profit conservation organizations, and countless other local government, public benefit, and other members of the public. Sparse comment, participation, and engagement on the subject is further evidence of exclusive and ineffective public outreach.

Request for Action

Considering the consistent findings within two separate science and policy reviews, the concerns voiced over the nature of the public involvement process, and the treatment of tribal co-managers as stakeholders rather than sovereign nations throughout this review, the Wild Fish Conservancy asks the Commission to suspend further development of C-3619 policy changes. Hatchery policy in the state of Washington has sweeping implications for salmon recovery, should be carefully considered, and must be grounded in science. We believe that the public engagement has fallen short and is becoming overly politicized. Until a robust, broadly supported engagement strategy can be realized, this approach to policy making will only further divide communities dedicated to fish recovery throughout the Pacific Northwest.

Additionally, based on the results of WDFW's Hatchery Reform Science Review the Wild Fish Conservancy requests that the Commission take a vote on immediately reinstating policy guidelines 1, 2, and 3 from the original 3619 Hatchery and Fishery Reform Policy (C-3619) until a scientifically-defensible rationale for suspending these actions is provided. While implementation goals have been missed, and compliance with the policy has fallen short, the

scientific justification for these guidelines remains sound. Instead of turning its back on sound hatchery and fishery reform science, the Commission and WDFW should instead commit to finally and fully implement the policy they adopted over ten years ago.

Thank you for your serious deliberations on this significant policy review and your commitment to wild salmon and steelhead within the State of Washington.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt Beardslee", with a long horizontal flourish extending to the right.

Kurt Beardslee, Executive Director
Wild Fish Conservancy
kurt@wildfishconservancy.org; 206.310.9301

Timeline of the C-3619 events

- June 15th, 2018-- Letter to Washington State Governor Jay Inslee dated regarding the suspension of key provisions within the Hatchery Reform Policy, signed by 77 individuals, including 21 PhD fishery scientists (attached).
- March 2019-- The Wild Fish Conservancy was forwarded a letter sent to Washington Legislators from 5 former Fish and Wildlife Commissioners (attached). These former Commissioners expressed that they felt the decision to eliminate commitments to science-based decision making and fish conservation made in the former hatchery policy were being held subordinate to outside pressures.
- April 2019, Wild Fish Conservancy staff scientists participated in a stakeholder process, noting sparse attendance (15 individuals).
- November 2019, Tribal Co-managers express deep frustration that a government-to-government consultation has not been initiated on the c-3619 policy review, and note significant challenges with regards to creating a lawful co-management process to address hatchery reform.
- February 6th, 2020 Wild Fish Conservancy Staff attend the Hatchery Science Review Workshop where past HSRG scientists, and other organizations testify with concern that scientific conclusions are inconsistent with the current direction of the policy review.
- April 15th, 2020, Governor's Salmon Recovery Office requests a formal briefing on FWC Hatchery Reform Policy, noting that they have not been updated on the science review, tribal engagement, or public feedback.
- Wild Fish Conservancy staff gave testimony 6/10/2020 expressing the above mentioned inconsistencies with science, as well as a lack of transparency on the opportunity for public comment.
- June 12th, 2020, Fish and Wildlife Commission Policy Decision [Draft] document was not made available to the public until 6:50am the day the Fish and Wildlife Commission voted to adopt it (at 1:00pm)
- July 28th, 2020, updated documents necessary for public review prior to the July 30 – August 1 Commission meeting are still not available to the public.

A Letter to Washington State Governor Jay Inslee
In Regards to Defending Science-Based Salmon Recovery Policy

Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Dear Governor Inslee,

We, the undersigned fishery and environmental scientists, are writing to let you know of our deep concerns regarding the June 15, 2018 decision by the Washington State Department of Fish and Wildlife Commission (FWC) to suspend key policy guidelines of their 2009 Hatchery and Fishery Reform Policy (POL-C3619), while it undergoes a 6-12-month review. (A copy of the policy is attached).

The reason the FWC adopted the Hatchery Reform Policy in 2009 was “to advance the conservation and recovery of wild salmon and steelhead by promoting and guiding the implementation of hatchery reform.” The Policy’s stated intent was to improve hatchery effectiveness, ensure compatibility between hatchery production and salmon recovery and rebuilding programs, and support sustainable fisheries.

It is important, here, to point out that shortly after the Endangered Species Act (ESA) listing of Puget Sound Chinook salmon in 1998, Congress recognized that hatchery fish spawning with wild fish significantly reduced the genetic fitness of wild fish. They also recognized that hatchery fish comprised most of the commercial, tribal and recreational harvest. To address this obvious conflict between the need to maintain fishing opportunity and at the same time meet the ESA requirement to protect and recover wild fish, Congress with support from Governor Gary Locke established and funded a group of independent scientists in 2000, the Hatchery Scientific Review Group (HSRG). The HSRG was charged with reviewing the hatchery management practices of state, federal and tribal hatcheries, and making recommendations to Congress on how to manage hatcheries consistent with the requirements of the ESA and recovery of wild salmon and steelhead populations. The HSRG submitted its report, “Hatchery Reform”, to Congress in 2004. A similar report for Columbia River hatcheries was submitted to Congress in 2009.

In 2011, the National Marine Fisheries Service (NMFS) 4(d) rule for salmon and steelhead formally recognized the importance of the HSRG’s Hatchery Reform Report by noting that “NMFS considers the HSRG’s principles, findings, and recommendations important to the advancement and implementation of measures needed to reduce risk of adverse hatchery related effects to natural-origin salmon and steelhead populations.” As you know, just recently the HSRG has worked successfully with the Lummi, Upper Skagit and Tulalip Tribes to develop scientifically credible Hatchery Genetic Management Plans that respect their Treaty Rights and produce hatchery salmon for harvest.

Even the federal courts have ruled that hatchery fish on the spawning grounds undermine the recovery of wild fish and cannot be counted toward recovery of ESA listed populations. The State of Washington has already lost a lawsuit concerning the management of hatchery steelhead because they ignored this fact. So, we do not understand why the FWC suddenly without a full public review, decided to ignore the best available science and not utilize independent scientists, the HSRG, to ensure that the state’s hatcheries are

managed consistent with the needs of wild fish. It is not only a dangerous precedent regarding the management of our state's fish and wildlife, it is as short sighted as ignoring the science of climate change. As with climate change, the overwhelming body of science confirms the need to protect wild salmon on the spawning grounds.

We would urge you to personally review the recent action by the Fish and Wildlife Commission to suspend the principles, standards and recommendations of the HSRG. We would call upon you to take two immediate steps. First, we would urge you to call upon the FWC to immediately reinstate the three key policy guidelines while conducting the Hatchery and Fishery Reform Policy review. Second, the actions of the FWC to suspend the guidelines while conducting the review gives the appearance of an inherent bias against the HSRG. Therefore, we would call upon you to put together a true independent process to review the HSRG recommended principles, standards and recommendations.

Unfortunately, the FWC's actions have created significant division at a time we can least afford it. We, like you, believe strongly that following the best available science and the use of independent science can bring people together for the common purpose of restoring our salmon runs and Orca Whale populations.

Sincerely,

Name	Title	Affiliation
Andrew Kinziger, PhD	Professor	Humboldt State University, Department of Fisheries Biology
Anne Shaffer, PhD	Executive Director	Coastal Watershed Institute
C I Goddard, PhD	Executive Secretary	Great Lakes Fishery Commission, AFS Fellow, Retired
Christopher Frissell, PhD	Principal Scientist	Frissell & Raven Hydrobiological and Landscape Sciences
Conrad Mahnken, PhD	Former WDFW Commissioner	WDFW, NOAA-Fisheries, Retired
David Montgomery, PhD	Professor of Geomorphology	Department of Earth & Space Sciences, UW
Gene Helfman, PhD	Professor Emeritus	Odum School of Ecology, University of Georgia
Jack Stanford, PhD	Professor Emeritus	Flathead Lake Biological Station
Julian Olden, PhD	Professor, SAFS	University of Washington
Ken Leber, PhD	Founder	Science Consortium for Ocean Replenishment
Lance Morgan, PhD	President	Marine Conservation Institute
Lars Mobrand, PhD	Past Chair of HSRG	HSRG, Retired

Matthew Sloat, PhD	Director of Science	Wild Salmon Center
Michael Blouin, PhD	Professor, Department of Integrative Biology	Oregon State University
Michael R. Miller, PhD	Associate Professor of Population and Quantitative Genetics	University of California, Davis
Nick Gayeski, PhD	Aquatic Ecologist	Wild Fish Conservancy
Patrick Trotter, PhD	Fishery Science Consultant	Retired
Peter Paquet, PhD	Northwest Power and Conservation Council	Retired
Richard Williams, PhD	Fisheries Ecologist and Research Associate	Department of Biology at The College of Idaho
Robert J Naiman, PhD	Professor Emeritus	School of Aquatic & Fishery Sciences, UW
Stephen Conroy, PhD	Senior Ecologist	King County Department of Transportation
Aaron Hill	Executive Director	Watershed Watch Salmon Society
Aaron Jorgenson	Biologist	Wild Fish Conservancy
Adam Brandt	Board of Directors, Secretary	Washington Water Trails Association
Adrian Tuohy	Biologist	Wild Fish Conservancy
Aileen Jeffries	Senior Research Scientist	Harbor Porpoise Project, Biota Maxima
Alan Levine	Director	Coast Action Group
Alexandra Morton	Founder	Raincoast Conservation Society
Amy Carey	Executive Director	Sound Action
Andree Hurley	President and Acting Executive Director	Washington Water Trails
Andy Appleby	Hatchery Biologist	WDFW, Retired
Ann E Prezyna	Environmental Attorney	
Chuck Owens	President	Peninsula Citizens for the Protection of Whales

Colleen Weiler, MSc	Jessica Rekos Fellow for Orca Conservation	Whale and Dolphin Conservation
Dave Seiler	Research Scientist	WDFW, Retired
Doug Hennick	Aquatic Ecologist	Wild Fish Conservancy
Emma Helverson	Outreach Coordinator	Wild Fish Conservancy
Frank Haw	Director	Washington Department of Fisheries, Retired
Grace Stiller	President and Founder	Nature Stewards Program
Jamie Glasgow	Director of Ecology	Wild Fish Conservancy
Jessica Helsley	Executive Director	Coast Salmon Foundation, Coast Salmon Partnership
Jim Lichatowich	Fishery Biologist and Author	Retired
Jim Martin	Chief of Fisheries	ODFW, Salmon Advisor to Governor Kitzhaber, Retired
John Barr	Chief Enhancement Biologist	Nisqually Tribe, HSRG, Retired
John Brosnan	Executive Director	Seattle Audubon Society
John C. McGlenn	President	Washington Wildlife Federation
John Kober	Executive Director	Pacific Rivers
John Sneva	Biologist	WDFW
Johnny Le Coq	Founder and CEO	Fishpond
Juan Carlos Cardenas N.	Executive Director, Veterinary Doctor	Centro Ecoceanos, Santiago de Chile
Justin Eastman	Biologist	Wild Fish Conservancy
Karen G. Wristen	Executive Director	Living Oceans Society
Kurt Beardslee	Executive Director	Wild Fish Conservancy
Lee Blankenship	Senior Research Scientist	WDFW, Retired
Lorna Smith	Vice-President	Olympic Forest Coalition
Maradel K. Gale	Executive Director	Bainbridge Beach Naturalists

Marcie Keever	Director, Oceans & Vessels Program	Friends of the Earth
Maria Meyer	Community Outreach Administrator	Central Co-op
Mark Greenwood	Secretary	Kitsap-Olympic Peninsula Chapter #383 of Trout Unlimited
Mark Sherwood	Executive Director	Native Fish Society
Mary Lou White	Field Biologist	Wild Fish Conservancy
Megan Adams	Biologist	Raincoast Conservation Foundation
Micah Wait	Director of Conservation	Wild Fish Conservancy
Misty MacDuffee	Wild Salmon Program Director	Raincoast Conservation Foundation
Noah Greenwald	Endangered Species Director	Center for Biological Diversity
Patrick Hanratty	Biologist	WDFW, Retired
Patrick Myers	Director of Outreach and Development	Wild Fish Conservancy
Paul Richard Dorn	Retired Senior Research Scientist	Suquamish Tribe, 1977 – 2017
Paul Seidel	Regional Hatchery Division Manager	WDFW, Retired
Peter Bahls	Fish Biologist and Director	Northwest Watershed Institute
Shari Tarantino	Executive Director	Orca Conservancy
Stan Moberly	President	American Fisheries Society, Retired
Steve Erickson	Executive Director	Whidbey Environmental Action Network
Steve Manlow	Executive Director	Lower Columbia Fish Recovery Board
Susan Ballinger	Founder and Lead	Wenatchee Naturalist Program
Tom Flagg	Supervisory Fisheries Research Biologist	NOAA-Fisheries, Retired
Whitney Neugebauer	Executive Director	Whale Scout

The letter below was drafted and signed by five former WDFW Fish and Wildlife Commissioners and delivered to members of the Washington state Legislature in March 2019.

March 11, 2019

Dear Legislator,

We, the undersigned former Washington Fish and Wildlife Commissioners, took part in the development and approval of the Department's Hatchery and Harvest Reform Policy as well as its Columbia River Reform Policy. We are writing to voice our dismay that much of the progress that we made through these reforms is being reversed.

After too many years of arbitrarily picking numbers to placate various user groups, our Commission decided to take a more principled approach. Our "Hatchery and Harvest Reform Policy" was central to that effort. The policy announced commitments to: 1) the best available science; and 2) wild fish conservation as the highest priority. Those commitments were made to apply both to fish protected under the ESA where the law already requires such stewardship as well as to runs that have not been listed *where the law's protections are less rigorous*. Without such clear commitments to science and to conservation, we believed then, and still believe now, that the Department will be perpetually driven by pressures to maintain historical practices rather than moving towards a sustainable future.

The current Commission's decision to suspend belief in the science and relax standards in place that protect wild fish genetics was perplexing. That decision relegated conservation and science to positions subordinate to outside pressures. We are keenly aware that it takes courage and strength of commitment to bring an end to practices that science has shown are detrimental to wild fish recovery. The reform policies were designed to create incentives for more selective fisheries and impose disincentives on users employing old more harmful methods. ***The Columbia River policy called for a buyback of non-Indian gillnets that was never attempted.*** Only with a determined effort to move towards more selective harvest methods can we produce much greater numbers of hatchery fish without harm to wild fish genetics.

Some users assert that current wild fish genetics are not pure enough—nothing like the wild fish of old. They claim that it makes no sense to conserve those "mongrel" fish. Established science tells us otherwise: *if they are free from excessive hatchery*

influence, naturally spawning fish will fairly quickly evolve and adapt to their home stream. By protecting naturally spawning fish, we are rebuilding genetically fit runs and protecting this fitness into the future.

For the state's non-tribal fishers, fishing is *not* a right, but a privilege. With the privilege comes a responsibility. Most users prefer not to adopt new fishing techniques, but everyone has a responsibility. We all are called upon to contribute through better forest practices, shoreline development rules, and habitat restoration spending. Fishermen and women cannot be exempted.

The 2018 State of the Salmon report from the Governor's Office listed 13 of the 15 listed runs as "below the goal." Only two of the runs were "near the goal. Reversing the downward trajectory will take courage and commitment. The millions of dollars being spent on salmon habitat restoration will be largely wasted *if no additional wild fish are allowed to escape into the restored habitat*. We cannot return to a time when we fished without concern for wild fish runs. We cannot return to a state of ignorance about the importance of fish genetics.

Fish runs are the public's heritage. As stewards of those resources, we urge you take a stand. The Department needs your direction to resist the pressure to allow fishing methods of the past that are unsustainable in the long run. The best path forward can be found by following the lodestars of conservation and good science. We urge your support of those principles.

With respect,

Dr. Conrad Mahnken, Former Director, Manchester Research Station, NW
Fisheries Science Center, WA Fish and Wildlife Commissioner 2006-2016

Rollie Schmitten, Former Director, National Marine Fisheries Service, NOAA, WA
Fish and Wildlife Commissioner 2009-2014

Chuck Perry, Former Range Land Ecologist, WDFW, WA Fish and Wildlife
Commissioner 2005- 2013

Gary Douvia, Vice President, Raymond James, LLP, WA Fish and Wildlife
Commissioner 2006- 2013

Miranda Wecker, Former Director of the Marine Program, UW Olympic Natural
Resources Center, WA Fish and Wildlife Commissioner 2005-2017