

From: Russ Mellon [REDACTED]
Sent: Friday, June 22, 2012 10:24 AM
To: Wessel, Ann (ECY)
Subject: Pending Dungeness Water Rule and Endangered Species

Dear Ann,

Please include the following question and comments as part of the public comments regarding the Proposed Washington State Department of Ecology Dungeness Water Rule. There appears to be two major issues: (#1) maintaining sufficient water flow in the Dungeness River for the survival of endangered species; and (#2) the protection of those species.

Question: How is the irrigation water in the Dungeness Valley, that is now enclosed in pipes, being allowed to flow back into the Dungeness River to help with instream flows?

Comment #1: For over 100 years the aquifer underlying many residential wells and small streams such as Bell, Cassalery and Matriotti Creeks benefitted from the seepage from the unlined open irrigation ditches meandering through the valley. If the Department of Ecology's theory is that residential wells are using water that would normally eventually seep through the aquifer into a small feeder stream or directly into the Dungeness River, it would hold that the water from the unlined ditches would also end up back in the river. **I feel the remaining unlined ditches should remain that way, with further piping terminated.**

I assume that during low flow periods the irrigation ditches are closed at the headgates, but during the Winter and Spring, open unlined irrigation ditches would add significantly to the supply of ground water available for the drier months. **Perhaps those irrigation ditches in pipes should be re-opened.**

Comment #2: I have lived in the Dungeness area since 1977 and as an ardent fisherman, have had a keen interest in health of the fish stock in the various area rivers and small streams. Until the Bolt Decision, there were tremendous runs of Chinook, Coho, Chum and Pink Salmon in the Dungeness River through about 1987. The tribal fishermen heavily netted the river for several seasons significantly reducing the number of native species returning to spawn. Certainly the non-tribal sportsman have had an impact as well, but netting the mouth of the river and Dungeness Bay was not a select fishing method, with the very species we are trying to protect, being prey to the nets. Fishing in Dungeness Bay and in most of Area 6 (east of Port Angeles to almost Port Townsend) is not open for Chinook fishing in the Summer and Fall for non-tribal and only clipped fin (non-native) Coho may be retained. Tribal fisherman can and do net inside Dungeness Bay in the Fall and retain and sell 14 to 20 pound native Coho salmon. If these are truly protected fish, the tribes should not be allowed to fish with nets which intercept, catch and retain protected stocks. Tribal fisherman should have to troll for salmon using barbless hooks and release native stock just as the non-tribals; or use fish wiers or other methods of catching and sorting fish without killing the native stocks. **This State and DOE needs to work closely with the Tribes and discountinue all gill netting in all State waters if we are really serious about saving the native stocks.**

It should be noted that we had near record returns last Fall of Pink salmon in the Dungeness River. These are native fish which demonstrates the water quality and conditions have been sufficient for survival. The main reason the Pink runs have been so strong is that they were and are not targeted by the tribal fishers and netted to any significant extent. Again, you cannot protect native fish if nets are going to be allowed. So it does not matter how much water is in the river. If the DOE really wants to fight for the protection of native fish stocks, please work with all the stakeholders, and put an end to all gill net fishing in State waters.

Please feel free to call me for validation of comments.

Sincerely,

Russ Mellon

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