

**Exhibit F**

**Public Correspondence received as of  
April 10, 2014**

## ODFW Coastal Plan

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**From:** bullshit on ending hatchery fish <billh@ifish.net>  
**Sent:** Tuesday, March 11, 2014 9:28 AM  
**To:** odfw.commission@state.or.us; ODFW.CoastalPlan@state.or.us; BROWNSCOMBE Brett \* GOV; REP Krieger; rep.caddymckeown@state.or.us; rep.davidgomberg@state.or.us; SEN Johnson; sen.arnieroblan@state.or.us; SEN Kruse; rep.braddwitt@state.or.us; sen.michaeldembrow@state.or.us; REP Clem  
**Subject:** Protect Oregon's Coastal Wild Fish, Please Craft a Legitimate Conservation Plan

I am concerned that the current draft of the Coastal Multi-Species Conservation and Management Plan will not protect wild, native salmon, cutthroat and steelhead along coastal Oregon.

Wild, native coastal salmonid populations are an important part of the unique heritage of Oregon. Long-term protection of these species is critical to the health and survival of these fish and the businesses that depend on them. I support ODFW's effort to develop a comprehensive conservation plan that is in line with Oregon's Conservation Strategy and Native Fish Conservation Policy; however, I do not support the CMP in its current draft.

Two independent scientific reviews of the plan, the Independent Multidisciplinary Science Team (IMST) and the Independent Science Review Panel (Panel), have come to the same conclusion: this plan lacks the necessary scientific credentials to be confident it will help prevent the depletion of any of the species, and should not be considered a conservation plan. I support the recommendations of these two reviews, which state that the draft CMP needs to better incorporate fundamental elements of accepted scientific convention. In reference to these omissions, the Panel states, "An effective, explicit, and integrated monitoring and evaluation protocol is probably the most important single product of any conservation plan"; yet, this essential monitoring and evaluation program is absent in the draft CMP.

Both the IMST and Panel reviews found that the current draft of the CMP fails to deliver a conservation plan grounded in the best-available science and is inconsistent with what is known about the limiting factors for habitat, harvest, and hatchery pressures facing coastal salmonids. For example, the draft CMP assumes hatchery fish pose a general risk to wild salmon and steelhead, but lacks discussion about the fundamental tradeoffs between hatchery and wild populations and makes no justification that the full use of existing capacity of hatchery fish production is amenable with the goal of fish conservation. I urge you to refer to the extensive scientific evidence over the last 30 years providing proof that hatchery fish are harmful and reduce performance and fitness to wild fish, and make adjustments to the CMP that will reduce these risks to wild populations.

I support the concept of wild fish emphasis (WFE) areas as a positive action towards protecting wild populations. However, there are several problems with the current CMP and the WFEs, which if left unresolved will be futile for protecting wild fish. The draft CMP has weak alignment between the WFE areas and the highest habitat integrity areas that have previously been recognized by ODFW. The CMP would be improved if there was a broader ecological approach to designating WFE areas, and that these were correlated to the department's extensive coastal stream habitat data. To achieve the greatest benefit, ODFW must provide clear conservation directions for other land managers that will guide their habitat protection and restoration work to be in alignment with the WFE areas. Of particular concern is the lack of a detailed ODFW monitoring plan that will prevent interaction between hatchery and wild fish in these areas, and how the plan will minimize the impacts of strayed hatchery fish on wild populations.

Two unique populations of summer steelhead exist within the CMP's coverage, in the Siletz and North Umpqua basins, and these fish warrant additional protections. In particular, the impacts of hatchery fish from straying and interbreeding pose significant threats to the viability of these unique populations. For example, under the Siletz River Basin Hatchery and Genetic Management Plan, hatchery steelhead spawning in the wild should be kept at 10% or less in natural habitats, but limited observations in tributaries of the Siletz River have indicated a substantial portion of hatchery

summer steelhead are spawning in wild winter steelhead habitats. Given the ten year average run of 500 adult wild summer steelhead (which is short of ODFW objectives for a 700 wild fish average) and combined with the observed straying of hatchery summer steelhead, it would be advisable to eliminate the summer steelhead hatchery releases on the Siletz or provide rationale for how ODFW plans to protect wild summer and winter steelhead from ecological completion below the falls and meet its 700 wild summer steelhead target while maintaining existing release numbers. This is but one example of how vulnerable populations, such as spring chinook, summer steelhead and chum salmon, would benefit from a CMP that explicitly states how the risks of straying, ecological competition and interbreeding will be minimized from hatchery and wild fish interaction.

The draft CMP contains no scientific justification to suggest a proposed "modest" harvest of wild winter steelhead will assist in conservation of native fish. I do not support any harvest of wild steelhead when critical questions on minimum escapement requirements, harvest impacts, and spawner abundance are left unanswered and unmonitored. Wild steelhead harvest on any population in which the health and productivity of its wild stocks remain unknown poses immediate and unnecessary risks. A conservation plan with this glaring omission seems disingenuous considering the fact that of the 15 distinct populations of steelhead on the west coast, 12 are listed as threatened or endangered, and not one has been recovered or de-listed from the ESA. Furthermore, a recent NOAA assessment on the status of coastal steelhead found that they face the likelihood of becoming endangered in the foreseeable future.

Predicted changes in population growth and the climate pose significant risk to coastal salmonids, but these issues only receive cursory attention in the draft CMP. As stated in the Panel's review, "An earnest conservation plan will have guidelines for managing fish populations and their habitats by accounting for what is known about future climate change, and explicitly identify preemptive strategies to combat potential climate related habitat and fish population losses." Furthermore, at risk populations such as chum salmon and early-run Chinook salmon are arbitrarily dismissed in the CMP from a scientific assessment putting these wild populations at even more risk. These examples are some of the numerous omissions of prudent scientific convention that were left out of the draft CMP.

I request that you consider the shared conclusions from the IMST and Panel review, and incorporate their recommendations in the final CMP. Why not take the necessary precautions when drafting a plan that affects so many populations of wild salmonids along Oregon's coast? The accepted scientific conventions are known, but have not been faithfully applied to the current draft of the CMP. Consequently, the current plan increases risks for all of Oregon's coastal fisheries and the economies that depend on the long-term viability of the fish. Unless these issues are remedied, it is unlikely this draft plan will help prevent depletion of these species and ensure these populations are viable into the future.

I am asking that completion of the Coastal Management Plan be suspended to give the department, as well as the public, time to carefully consider the shared conclusions from the IMST and the Independent Science Panel. A successful CMP will be consistent with conservation goals, establish an explicit monitoring and evaluation protocol, discuss reasonable alternatives to safeguard unique species and take the necessary precautions in order to protect Oregon's coastal salmonid populations into the future.

Thank you for the opportunity to comment on this draft of the Coastal Multi-Species Conservation and Management Plan.

Sincerely,

Sincerely,  
bullshit on ending hatchery fish  
Tillamook, Oregon  
97141

## ODFW Coastal Plan

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**From:** Phoenix Vie <phoenixsings@gmail.com>  
**Sent:** Wednesday, March 12, 2014 5:43 AM  
**To:** odfw.commission@state.or.us; ODFW.CoastalPlan@state.or.us; BROWNSCOMBE Brett \* GOV; REP Krieger; rep.caddymckeown@state.or.us; rep.davidgomberg@state.or.us; SEN Johnson; sen.arnieroblan@state.or.us; SEN Kruse; rep.braddwitt@state.or.us; sen.michaeldembrow@state.or.us; REP Clem  
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Sincerely,

Sincerely,  
Phoenix Vie  
Berkeley, CA  
94706

## ODFW Coastal Plan

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**From:** tony@summerrun.net  
**Sent:** Wednesday, March 12, 2014 10:30 AM  
**To:** ODFW.CoastalPlan@state.or.us  
**Subject:** ump

Hi Guys

I know it past the 10th but I hope you will read this any way. I am against killing of wild winter steelhead on the Umpqua system. I do not feel it can handle a harvest and have good fishing at the same time. There has not been a proper study on the fishing pressure to know how many fish would be killed so I feel we should air on the side of preserving good fishing rather than putting them in the freezer to burn.

Hope you make the right call

Tony Wratney

## ODFW Coastal Plan

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**From:** Thomas Goodwin <tmgoodwin@sbcglobal.net>  
**Sent:** Wednesday, March 12, 2014 11:45 AM  
**To:** odfw.commission@state.or.us; ODFW.CoastalPlan@state.or.us; BROWNSCOMBE Brett \* GOV; REP Krieger; rep.caddymckeown@state.or.us; rep.davidgomberg@state.or.us; SEN Johnson; sen.arnieroblan@state.or.us; SEN Kruse; rep.braddwitt@state.or.us; sen.michaeldembrow@state.or.us; REP Clem  
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Thank you for the opportunity to comment on this draft of the Coastal Multi-Species Conservation and Management Plan.

Sincerely,

Sincerely,  
Thomas Goodwin  
Modesto, CA  
95355

## ODFW Coastal Plan

---

**From:** ODFW Commission <odfw.commission@state.or.us>  
**Sent:** Thursday, March 13, 2014 9:28 AM  
**To:** Amanda Mckenzie; odfw.coastalplan@state.or.us  
**Subject:** FW: Comments to ODFW  
**Attachments:** WSC Comments on ODFW Coast Plan - March 10 final.pdf

For your records. – Teri Kucera

**From:** Guido Rahr [<mailto:grahr@wildsalmoncenter.org>]  
**Sent:** Tuesday, March 11, 2014 4:16 PM  
**To:** Ed Bowles  
**Cc:** [odfw.commission@state.or.us](mailto:odfw.commission@state.or.us); BROWNSCOMBE Brett \* GOV  
**Subject:** Comments to ODFW

Dear Ed,

Attached please find our comments on the Coastal Multispecies Conservation and Management Plan.

We applaud the department's efforts to work with local communities and organizations to build a portfolio approach for wild fish conservation and fisheries management.

We support the overall direction of the plan, especially the designation of Wild Fish Emphasis Areas.

Thank you again for all of your efforts.

Sincerely,

*Guido Rahr  
President & CEO  
Wild Salmon Center  
721 NW 9th Ave, Suite 300  
Portland, OR 97209  
Direct: (971) 255-5545  
Main: (503) 222-1804*

[www.wildsalmoncenter.org](http://www.wildsalmoncenter.org)

Follow us on [Facebook](#) and [Twitter](#)



Ed Bowles  
Fish Division Administrator  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

March 11, 2014

Dear Mr. Bowles,

Thank you for this opportunity to comment on the Oregon Department of Fish and Wildlife (ODFW) draft Coastal Multi-species Conservation and Management Plan (Plan). The mission of Wild Salmon Center (WSC) is to promote the conservation and sustainable use of wild salmon ecosystems across the Pacific Rim. We identify science-based, pragmatic solutions to sustain wild salmonids and the human communities and livelihoods that depend on them.

Overall, WSC supports the Plan and applauds OFDW for taking a proactive approach to the management of the six distinct groups of fish species addressed in the Plan. We recognize that management planning in the absence of a crisis (a federal ESA listing, for example) presents unique challenges. Proposed revisions to long standing management approaches are quickly viewed with concern by local stakeholders with an "if it ain't broke, don't fix it" philosophy. Wild Salmon Center believes this position fails to consider not only growing threats, like climate change and human population growth, but also the many historical examples of salmon population crashes resulting from reactive management. Wild Salmon Center believes a proactive plan of this type is critical to secure the health of wild coastal populations. We further believe that the Plan's "portfolio approach" is an appropriate and innovative way to balance much-needed reductions in risk to some wild populations with hatchery production and harvest opportunity within others.

While we have concerns with some of the proposals contained in the Plan (summarized below), we believe that the establishment of wild fish emphasis areas (WFEAs) represents a substantial conservation benefit for selected wild populations. As the department is aware, a substantial body of scientific research describes the ecological and genetic risks that hatchery reared salmon pose to their wild counterparts. We are confident that WFEAs will prove to be an effective method of addressing the ecological and genetic effects that are annually introduced from hatchery fish, while increasing opportunities for wild populations in these areas to increase spatial distribution and take full advantage of habitat productivity.

INTERNATIONAL HEADQUARTERS

721 NW Ninth Avenue, Suite 300 • Portland, Oregon 97209 USA • tel: 503.222.1804 • fax: 503.222.1805

info@wildsalmoncenter.org • www.wildsalmoncenter.org

Wild Salmon Center also supports the Plan's proposal to adopt a sliding harvest scale that better responds to annual fluctuations in abundance. This approach will allow managers greater flexibility to respond to more up to date abundance estimates, and eliminate the uncertainty and concern among anglers resulting from annual river-by-river management reviews. Similarly, we support lower daily retention limits for average runs of Chinook in areas of high fishing pressure (eg, the north coast stratum), inconsistent status information (Tillamook, Nestucca, Salmon, and Floras rivers), and a non-viable population (Elk River). We also applaud the Plan's efforts to protect unique life histories and run timings like Siletz summer steelhead, Umpqua spring Chinook, and early run Chinook on the Nehalem and Siletz. The Plan's mandatory return of harvest tags will improve population estimates over time on these and other populations, though WSC encourages the department to ensure entry of tag data is given sufficient priority in the agency's budget.

### **Recommendations to strengthen the Plan**

Define Wild Fish Emphasis Areas. The department's establishment of WFEAs marks an important precedent in the state's management of wild fish. For the first time in Oregon, a salmon management plan recognizes that hatchery fish pose risk (in the absence of population-specific data and analysis that prove it) and responds by creating sanctuaries for wild fish at a landscape scale. While the establishment of WFEAs is the strength of this Plan, we encourage the department to more clearly define the role and function of a WFEA. Specifically, a definition should clearly articulate – and ideally, quantify – how a WFEA or portfolio of WFEAs advances broader SMU or stratum-wide conservation objectives. Similarly, in future plans – both on the coast and in other regions – we encourage ODFW to more fully consider watershed health, habitat suitability, and a system's capacity to maintain wild populations when establishing WFEAs.

Develop hatchery management standards. The Oregon Fish and Wildlife Commission should require the development of hatchery management standards and establish a timeline for hatchery programs to meet those standards. Additionally, the Plan should propose an integrated monitoring program to ensure that hatchery performance can be evaluated according to these formally adopted standards.

While establishing WFEAs will play an important role in reducing risk to wild populations, the risk of hatchery fish straying into these wild salmon rivers from systems designated as hatchery emphasis areas persists. Monitoring of hatchery fish on the spawning grounds (pHOS) within WFEAs should be the first priority for performance monitoring and implemented prior to Commission approval of a suite of standards.

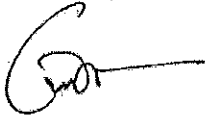
Eliminate wild steelhead harvest proposals. Wild Salmon Center is concerned about the quality and consistency of data used to support wild steelhead harvest proposals. We recommend that the department postpone the wild steelhead harvest proposals in the Salmon River, Big Elk Creek, and East Fork Coquille River until available data can be more fully reviewed by interested stakeholders.

River-specific proposals in the Plan. Because of the department's considerable need to support monitoring and other core management functions, the proposal for new releases of hatchery spring Chinook in Yaquina and Coos Bays (100k each) should be financed with private funds only. In addition, approval of the projects should be contingent on a commitment of private funds sufficient to monitor and evaluate performance according to pre-defined standards (as highlighted above).

ODFW's determination of Elk River fall Chinook as non-viable requires an immediate review of hatchery operation guidelines, performance monitoring, and genetic analyses to determine future management options. While the reduction of 50,000 fish represents an important step, a more comprehensive approach to reforming management of the Elk River fall Chinook hatchery program is required. We support the development of an action list to address hatchery operational issues and increase harvest of hatchery fish that will significantly reduce the number of hatchery fish on the spawning grounds – as well as spawning below the hatchery. It should be noted that the extensive list of unfunded improvements needed to modernize the Elk River hatchery programs illustrates why new net pens in the Coos and Yaquina should not receive public funds.

Thank you for the opportunity to provide these comments. Please contact me if you have any questions or would like to discuss these recommendations further.

Sincerely,



Guido Rahr  
President and CEO

Cc: Brett Brownscombe  
Bobby Levy  
Michael Finley  
Gregory J. Wolley  
Laura Anderson  
Bob Webber  
Holly Akenson



March 14, 2014

Re: Coastal Multi-Species Conservation and Management Plan

Ed Bowles  
Fish Division Administrator  
Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, Oregon 97302

Dear Mr. Bowles:

The Central Coast Fly Fishers club is an International Federation of Fly Fishers Charter Club with over 40 members. Our monthly meetings are held in Waldport, Oregon with membership living and fishing throughout the waters of the Oregon Coast. We provide the following response to the Oregon Department of Fish and Wildlife's request for review comments on the January 2014 draft Coastal Multi-Species Conservation and Management Plan (CMP).

Our organizations Native Fish Policy is in close agreement with the ODFW Native Fish Conservation Policy (NFCP). Salmonid life history diversity is at the heart of resilient native fish populations. The current draft of the Coastal Multi-Species Conservation and Management Plan recognizes that habitat is the foundation for conservation and fishing opportunity. The need for restoration of historical watershed function, stream channel complexity, floodplain connectivity, as well as estuarine tide marshes and bay habitats is mentioned in the Plan. Freshwater limiting factors are recognized as the typical "bottleneck" for our coastal fish populations. The CMP makes no attempt to identify or address limiting freshwater limiting factors, which shake the foundation of native fish conservation and fishing opportunity.

The Coastal Multi-species Management Plan strays too far from the habitat foundation of the Oregon NFCP to meet its purpose or goals .

We do support the sliding scale harvest management concept and support harvest limits when returns are forecast to be below average. We do support the Portfolio approach to assigning different management emphasis to balance conservation and fishing opportunity creating wild fish emphasis areas.

### **Salmon River**

The Salmon River is an excellent Wild Fish Emphasis Area. The Salmon/Drift Creek Watershed Council has focused aquatic restoration work in the Salmon River Estuary in the recent past; their plans are to focus fish habitat restoration assessments in Upper Salmon River, Bear Creek, Trout Creek, and Slick Rock Creek in the near future. Their work collaborating with multiple agencies and many partners has been received National and International recognition. It has also been the subject of OWEB billboards on our state highways. It is an estuary restoration research destination documenting the benefits of aquatic habitat complexity with direct benefits to fish. We hope Salmon River wild winter steelhead can one day support a native fish fishery. Today is not that day. It is premature to open a wild winter steelhead fishery in Salem's back yard before aquatic habitat restoration has been assessed and implemented. **We do not support wild steelhead harvest in the Salmon River at this time.** There is much work to be done before a wild winter steelhead fishery in Salmon River consistent with the Native Fish Conservation Policy can be realized.

Salmon River is currently a US-Canada Treaty indicator river for Chinook salmon stock status. The next ten years should be used to find other techniques for monitoring stock status while we work together to ensure the conservation and recovery of native fishes. The CMP should document the intention to close the Salmon River Fish Hatchery within 10-years, end the release of hatchery fish in the Salmon River in this Wild Fish Emphasis area.

### **Siletz River**

The Central Coast Fly Fishers is in agreement with the Siletz Watershed Council and Confederated Tribes of the Siletz Indians that the permanent deadline for Fall Chinook should be located 1200 feet upstream from Ojalla Bridge to protect spawning grounds and reduce disturbance of spawning fish.

### **Yaquina River**

A new Spring Chinook fishery is proposed for Yaquina Bay with a release of 100,000 smolts. We ask that you closely monitor the Siletz and Alsea Rivers for stray returning adults.

### **Alsea River**

We are concerned with the loss of angling opportunity in Alsea River drainage. Please consider programs including aquatic habitat restoration that will enhance

the numbers of wild Chinook that return to this water system. This is not only important for the sportsman but economically for the Waldport area.

### **Smolt Predation**

There is great concern about the predator problems for migrating smolts within Alsea Bay. Although this topic is very political, dialogue needs to continue to find solutions to improve this situation. Alsea Bay lacks hiding cover for migrating smolts. Consider habitat restoration solutions for below tidewater and within the bay that could improve smolt survival on their journey to the Ocean.

### **Chum Salmon**

The Coastal Multi-Species Conservation Plan, in current form, describes chum salmon as "currently present consistently in few places and in other places either in low numbers or only periodically." The Plan concedes that "early catch records indicate that chum were much more abundant 40 or more years ago than they are today, population-specific historic information is limited." The conclusion is "it was not possible to confidently identify an historical population structure for chum because it is unknown which populations acted independently and which did not." Chuck Huntington, Clearwater Biostudies, Inc. presented a paper at the Oregon Chapter American Fisheries Society meeting February 26, 2014 describing the historic chum salmon runs on the Oregon Coast north of the Rogue River reconstructing historical records. He was also able to describe the early-run Chinook runs. This information must be included in this Plan. This Plan will not be complete and does not come close to meeting the Native Fish Conservation Policy with the current limited consideration of chum salmon. Chum salmon were the dominant salmon species in several of our drainages. The decline in chum numbers and distribution is undeniable. Missing this opportunity to focus efforts on chum salmon recovery on the Oregon coast is not in compliance with the Native Fish Conservation Policy. **A chum salmon restoration strategy needs to be included in this CMP.**

### **Limiting Factors**

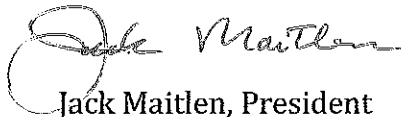
The CMP lists limiting factors in four management categories: hatchery fish, harvest, predation, and habitat. The CMP focuses on hatchery fish and sportsman fish harvest to improve native fish conservation. The other two limiting factors, habitat and predation are mentioned but not addressed. Two percent of the department budget is identified for habitat. Less than 2% of the CMP is focused on habitat. Smolt predation solutions are not addressed. The next draft of the CMP needs to identify habitat restoration and smolt migration strategies for native fish conservation.

### **Coastal Cutthroat Trout**

The CMP mentions native cutthroat trout but does not address management opportunities to ensure this native fish population will persist into the future. Native coastal cutthroat trout are found well up in the headwaters of our coastal

stream subject to logging on state, private, and federal lands. ODFW is in the best position to ensure habitat preservation on state and private lands.

Brianna Sounhein, ODFW spoke on Coho Monitoring on the Oregon Coast: Past, Present, and Future, at the American Fisheries Society meeting February 27, 2014. She told the audience that OASIS funding for 2014 is cut. She expects to only field one survey crew this year. Meeting the requirements of the NFCP is unlikely with current funding. The Coastal Multi-Species Conservation and Management Plan must include a request for additional funding. We suggest identification of the budget needed to meet the requirements of the Oregon Native Fish Conservation Plan.

A handwritten signature in cursive script that reads "Jack Maitlen". The signature is written in black ink and is positioned above the typed name.

Jack Maitlen, President  
Central Coast Fly Fishers  
PO Box 1121  
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