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Public Forum

Questions for Staff and Rulemaking Alternatives

1 message

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Dear Commissioners,

First, we would like to present some questions that might be worth asking ODFW staff during their Steelhead Population Status Update.

1. Which rivers do "skamania" summer steelhead return to? What happened to the Skamania Summer Steelhead population this year?
2. Given the extremely low run of wild B-run steelhead and the multiple risks they face during their migration, are managers tracking cumulative impacts closely enough? Does staff maintain a table or spreadsheet that tracks the number of wild B-run steelhead mortalities day to day or week to week so that all of us can know if we are holding on or losing ground? If not, why not?
3. In your professional opinion, where lies the biggest risk to wild B-run steelhead during their current 2017-18 migration?
4. Given the low returns of wild steelhead in 2016 and 2017, as well as the projected poor marine conditions that juvenile steelhead and kelts will face in the coming years, doesn't it make sense to back off of fishing now and ensure that wild steelhead spawning escapement is maximized this year?
5. Please explain how Oregon and our sister states are able to make sure we meet spawning escapements in rivers like the Deschutes, Yakima and Grand Ronde when we allow incidental mortality and directed fisheries on these wild fish before we know how many of them will make it back to their home rivers to spawn.
6. In your professional opinion, given the low numbers of some populations and species and the lack of reliability of our recent efforts, would it be beneficial for the states, tribes and federal fishery managers to carefully examine current forecasting methods, modeling tools and monitoring and observation methods, and be open to overhauling, re-calibrating and re-tooling them so that they can better serve decision makers, the managers and the public?
7. Steelhead are not salmon. Why are we managing them like they are?

Second, I want to raise some issues and present some alternative actions concerning the three proposed temporary rules.

1. There is a clear preference, though not an absolute requirement, for concurrent rules in the concurrent waters of the Columbia and Snake.

The proposed rule for river refugia contain some provisions for areas that include Washington waters. If concurrency is unattainable, the Commission could still act for Oregon waters, which includes Eagle Creek, Herman Creek, Hood River, Deschutes River, John Day River, and the Umatilla River. Creating river refugia for these waters would be beneficial to reducing the encounter rate on wild steelhead.

2. We use the term "river refugia" because the use of these confluence areas is influenced not only by cooler water temperatures, but by temperature gradient current speed, river flow, bottom structure and even the mineral content of the waters. All salmon use these areas, but steelhead are unique in their use and reliance on these areas where two water bodies mix (or even where groundwater upwelling occurs). They are essential for survival, productivity and diversity.

3. If the proposed rule language is not clear and/or the necessary procedural basis for taking direct action appears uncertain, the Commission could direct staff to draft the appropriate temporary rules to accomplish the wishes and intent

of the Commission for subsequent adoption under your delegation of rulemaking authority to the ODFW Director.

Our organizations would welcome the chance to work with the staff to refine a temporary rule that accomplishes the essence of what we have presented to you (assuming you find the rationale and intent of the proposed rule achieves your intent).

Lastly, I wish to thank all of you for your efforts to wrestle with some of the very toughest issues Oregon faces. We appreciate the opportunity to work with you formally and informally to tell you what we value, and learn what you value, and hopefully work together to the greatest degree possible. Each of our organizations sees a vibrant future for the Pacific Northwest - and one that includes abundant wild steelhead and salmon - and we are working hard to ensure we do not lose the foundation for this vision.

With great respect, and on behalf of The Conservation Angler, Native Fish Society and the Wild Fish Conservancy,

David Moskowitz

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