

Roxann B Borisch

From: Kirk Blaine <kirk@nativefishsociety.org>
Sent: Thursday, July 9, 2020 1:52 PM
To: ODFW.Commission@state.or.us
Subject: Climate and Ocean Change Policy Comments

Categories: printed

Chair Wahl, Commissioners, and Director Melcher,

Thank you for the opportunity to submit written comments on the Climate and Ocean Change Policy. My name is Kirk Blaine and I write to you on behalf of Native Fish Society, a non-profit working to restore abundant wild fish, free-flowing rivers, and thriving local communities. Native Fish Society supports the adoption of the proposed Climate and Ocean Change Policy being presented to the Commission on July 10th. This policy will add science-based management related to the threats of climate and ocean change to the current planning and execution of department goals and objectives.

Native Fish Society does have concerns. We ask that the commission and department uphold actions indicated in the policy ensuring a science-based approach to Climate and Ocean Change is integrated in all planning, prioritization, and implementation of the Department's Key Principles. Native Fish Society strongly encourages the department to craft detailed implementing regulations that provide adequate adaptive management frameworks and ensure that there are no sacrifice rivers, zones, or native fish populations. The department must be held accountable for the goals outlined in this policy and the actions they take to reach the specific policy goals. When these goals are attained or failed to be attained specific actions must be laid out to achieve success.

Establishing and ensuring sustainable funding for an ODFW Habitat Division is crucial to seeing this policy positively impact wild native fish. Securing funding for both the Habitat Division and population monitoring work will be critical to meaningfully implementing this policy.

Native Fish Society would like to see the Climate and Ocean Change Policy be mandatory in all stages of future planning and management of fish and wildlife species. For example, through the current stakeholder process for the Rogue South Coast Multi-species management plan, there has been no substantive integration of Climate or Ocean Change science into fishery and hatchery proposals by the state. Utilizing this policy as the foundation for planning the management and conservation of those species is critical to future success.

Again, I would like to thank you for the opportunity to submit a comment. Native Fish Society is excited to see direct details implemented from this policy to help restore our wild native fish for all Oregonians to enjoy now and into the future.

Best,
Kirk Blaine

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Roxann B Borisch

From: Mia Rosser <414891@bsd48.org>
Sent: Thursday, July 9, 2020 5:07 PM
To: ODFW.Commission@state.or.us
Subject: Ocean and Climate Change Policy Comments

Follow Up Flag: Follow up
Flag Status: Completed

Categories: printed

Hi my name is Mia, and I am fourteen years old. I have lived in Oregon for my whole life. I am writing to you because I care about our state and preserving its environment. I support the commission adopting the proposed Climate and Ocean Change policy, because I want to make sure climate and ocean change is always considered for all matters. I want to make sure Oregon has science based management related to the threats of climate change. I believe the department needs to create the habitat division with appropriate funding to put to work the climate and ocean change policy.

I believe in the importance of nature on this Earth and in this beautiful state. I am here because I believe in the power nature can have on happiness.

I grew up in the Pacific Northwest, and I get my peace and joy from the outdoors. I am writing to you because conservation of fish and keystone wildlife species are essential to our ecosystem. I am writing to you because I am passionate about the environment.

Passing this policy will help our state fully thrive in nature for future generations like me. It is a step in the right direction. Please pass this policy so we can keep the forests and rivers of Oregon for future generations.

Sincerely, Mia Rosser

Sent via email to: <ODFW.Commission@state.or.us> <Michelle.L.Tate@state.or.us>

Oregon Fish & Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

July 8, 2020

Richard Nawa
POB 654
Selma, OR 97538

Re: Oregon Fish & Wildlife Commission July 10 Meeting-
EXHIBIT C: CLIMATE and OCEAN CHANGE POLICY

Dear Chair Wahl and Oregon Fish and Wildlife Commissioners,

I am Richard Nawa. I live near the Illinois River in Cave Junction, Oregon. I have over 30 years of professional experience with fish and fish habitat management in Oregon. I am a stakeholder for the Rogue Stratum in the ongoing development of the Rogue-South Coast Multi-Species and Conservation Plan. I provide these comments as a private citizen.

I am skeptical that the Climate and Ocean Change Policy will “ensure that the Department prepares for and responds appropriately to the impacts of a changing climate and ocean on fish, wildlife, their habitats, and their use and enjoyment by current and future Oregonians.”

The Department should be developing management strategies to harvest salmon that replaces the annual mixed stock ocean fishery but they won't.

The Department should be developing contingency plans to greatly reduce failing hatchery fish production but they won't.

The Department should be convening an ad hoc team of independent scientists to assist stakeholders in the development of multi-species plans but they won't.

The use of the words “should” and “appropriate” effectively shields the Department's fish harvest and fish production programs from climate change policy. Myself and others working as stakeholders in the development of the Rogue-South Coast plan requested the Department to convene an ad hoc team of scientists to assist us in responding to a plethora of hatchery fish proposals, fishing regulations and monitoring¹. Myself and other stakeholders were concerned that the sweeping proposals by the Department were not an appropriate course of action due to climate and ocean change, however, the Department immediately told stakeholders that there would be no science team to assist us with climate change issues and that we should work to reach consensus.

¹ The Native Fish Conservation Policy (8)(a) states “use the most up-to-date and reliable scientific information and, as appropriate, convene an ad hoc team of scientists for collaboration and assistance;”

The Department is not going to develop alternatives to the mixed stock ocean fishery or consider reduced fish production from fish hatcheries unless directed to do so by the Commission. It is painfully obvious that large scale hatchery fish production to drive a mixed stock fishery in the ocean and rivers cannot continue indefinitely in the face of climate and ocean change. Continuing existing high hatchery production and seeking ever increasing hatchery fish production is the poorest possible management in the face of climate and ocean change since hatchery fish cannot adapt to changing ocean and freshwater conditions.

Compartmentalizing climate and ocean change as a “habitat issue” is a convenient way for the Department to not come to terms with ever increasing failures of large scale hatchery salmon production needed to drive the mixed stock ocean fishery. The Elk River Chinook run is now on track for functional extirpation due to annual releases of 300,000 hatchery smolts. The Elk River has some of the finest habitat on the Oregon Coast yet its Chinook population is not viable. Early returning Rogue spring Chinook to the Cole Rivers hatchery are disturbingly low in recent years despite releases of 1.7 million smolts.

Subsequent to adoption of the Climate/Ocean Change policy, the commission could direct the Department to convene an ad hoc team of independent scientist for collaboration and assistance in developing an alternative to the mixed stock ocean salmon fishery. This would be consistent with both the Native Fish Conservation Policy and the Climate/Ocean Change policy. Place based salmon fisheries to replace the mixed stock ocean fishery have been suggested by scientists for decades. Nick Gayeski and five other prominent scientists provide a viable place based ecological framework to replace the economic based fisheries management paradigm (Gayeski et al 2018 attached).²

The Department should not be risking the future of the public’s native salmon and steelhead for the subsidized economic gain of fishers but they are. The Department will not pursue possible major changes to economic based management practices unless directed to do so by the Commission. The Department in collaboration with an independent science team could address two questions:

How can the Department wean fishers from the mixed stock ocean fishery?
How can the Department wean fishers from large scale hatchery fish programs?

Sincerely,



² Gayeski, N.J., J.A. Stanford, D.R. Montgomery, J.Lichatowich, R.M. Peterman, and R.N. Williams. 2018. The Failure of Wild Salmon Management: Need for a Place-Based Conceptual Foundation. Fisheries Vol. 43. No.7.



July 6, 2020
Submitted
Via Email

ODFW Commission
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302

Re: Support - Proposed Climate and Ocean Change Policy

Dear Roxann Borisch:

Pacific Seafood is a family owned business headquartered in Clackamas, OR, and has been serving the ocean by harvesting, farming, processing, distributing, and selling the highest-quality and best tasting seafood for more than 75 years. Pacific Seafood would like to offer our support for ODFW's proposed Climate and Ocean Change Policy.

We appreciate the development of a draft policy that is intended to be high level and provide direction with respect to the following:

- Coordinating the response to climate and ocean change with other state, tribal, federal, & local entities
- Incorporating climate and ocean change awareness into ODFW's science and resource management
- Preparing the Department's assets and infrastructure for the impacts of a changing climate and ocean
- Reducing the Department's contribution to net greenhouse gas emissions

We understand ODFW staff have worked internally for the last 8 months to this develop this draft policy, and we sincerely appreciate how ODFW staff and leadership conducted thoughtful outreach to our company and other stakeholders in the seafood industry every step of the way.

We thank the Commission for the opportunity to comment, and again, we acknowledge and appreciate ODFW's collaborative approach in developing this draft policy.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Gonzalez".

Jonathan Gonzalez
Policy Specialist - Fisheries
Pacific Seafood Group
t: 805-455-7220
jgonzalez@pacseafood.com