

Public Correspondence

Received October 15 - November 30, 2021

KINGSLEY Lisa M * ODFW

From: Joe <j.rutt@hotmail.com>
Sent: Friday, October 15, 2021 6:01 PM
To: COMMISSION ODFW * ODFW
Subject: Rogue Statement

My name is Joe Rutter, I live in Port Townsend, Washington and I love the Rogue River and the South Coast Watersheds. I've taken some very memorable fishing trips there and continue to keep coming back to this special place. After hearing of the current situation to continue allowing harvest of Wild Winter Steelhead on the Rogue and South Coast Watersheds, I felt that I should voice my opinion on the situation.

Steelhead face many obstacles as a species at this day in age. And they keep mounting up year after year as their habitat declines, Ocean conditions become worse, and over harvest continues to occur. Each year the return numbers are becoming less and less across board. Steelhead can't keep facing more troubling obstacles, especially if they are obstacles within our immediate control that we can change for the better. The October Draft of the Rogue and South Coast rivers plan is proposing wild steelhead harvest without sufficient population estimates, harvest rates, and overall population mortality. To put it simply-This draft does not sound accurate enough with sufficient data to allow the harvest out of these rivers and is putting way too much risk on Wild Steelhead populations in Southern Oregon.

As a solution to this situation, I request that the commission direct ODFW and the powers that be to adopt catch and release regulations to these watersheds. and that ODFW provide adequate management, data and monitoring with adult steelhead population estimates, escapement goals and expected fisheries mortality before allowing harvest.

Thank you so much for giving me the opportunity me speak on behalf of these species I'm so passionate about. I hope that the catch and release regulations will be implemented for Wild Winter Steelhead on the Rogue and South Coast watersheds and that ODFW will start collecting the proper, accurate data, so steps can be made to ensure a healthy abundance of Wild Steelhead in these special rivers for the future and that our future generations may enjoy fishing these rivers too, for years and years to come.

Thanks so much,
Sincerely, Joe Rutter

Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Alex Gonsiewski <alexgonsiewski@gmail.com>
Sent: Friday, October 15, 2021 6:34 PM
To: odfw.commission@state.or.us
Subject: Rogue/South Coast Management Plan

To the ODFW Commissioners,

Thank you for allowing public comment at today's meeting. It is great to see so many Oregonians speak up for what they believe in. I want to follow up my personal comments regarding the Rogue/South Coast Management Plan. Specifically, I want to make clear my disapproval of the proposed continuation of the harvest of wild winter steelhead and more clearly share my perspective on their unrealized economic potential for the state of Oregon.

I am a lifelong Oregonian and have enjoyed fishing for steelhead throughout the state for close to 30 years. For the last 13 years I have made my living guiding anglers on the North Oregon Coast, Deschutes and John Day Rivers fishing primarily for steelhead. This year I am out of work because of the collapse of the wild summer steelhead population in the Columbia basin and the subsequent closure of the Deschutes and John Day rivers. The thought ODFW would move forward with allowing the killing of WILD steelhead given the dire state of their populations throughout their range is reprehensible and of a foregone time. This is especially true given that the commission recently closed three tributaries of what is historically the largest steelhead river in the world to all steelhead fishing for the remainder of the year. However, merely ending the harvest of WILD Winter Steelhead on the southern coast would be a failure by ODFW to see the bigger picture.

The bigger picture is that ODFW needs to stop believing that the highest value of anadromous fish is in the bottom of a cooler. These fish are extremely valuable to a large portion of the angling community for the sole reason being they are WILD. We would gladly open our wallets and pay many times more per year to fish for WILD fish in wild rivers and smile as we release them. As things currently stand the Combined Angling tag amounts to little more than a harvest card, this is a shortsighted and antiquated approach that does not maximize the monetary value of these fish. Now is the time to look towards new ways of realizing the economic potential that wild steelhead populations offer.

This fact is apparent when one realizes how many Oregon/ Washington anglers travel each year to British Columbia and willingly pay thousands of dollars a week to fish for Wild Steelhead, full well knowing and being proud of the fact that they are 100% catch and release fisheries. Many of these rivers have a license fee of \$40+ per day for out of Province/Country anglers! We pay these fees with smiles on our faces because of the perceived abundance and value that BC has put on these magnificent fish. It is time for Oregon to stop looking behind us and start leading the way in the protection and championing of these fish.

The current system of attempted protection of wild fish has cost the state large amounts of money and overall failed to bolster populations of wild steelhead. It is time for a new approach, one that shows all interested parties the true economic and intrinsic value of wild steelhead.

Thank you for your time, I implore you to consider this perspective,

Alex Gonsiewski
(503)810-2740
www.alexgonsiewski.com

KINGSLEY Lisa M * ODFW

From: John Kirk <jkirkuvvm@gmail.com>
Sent: Sunday, October 17, 2021 8:19 AM
To: COMMISSION ODFW * ODFW
Subject: Please stop Wild steelhead Harvest!

Hi,

My name is John Kirk and I am an avid steelhead fisherman.

In light of poor returns of steelhead up and down the pacific coast, I beg of you to change your local regulations regarding harvest of wild steelhead in Oregon.

Their populations are in steep decline and we can no longer justify the harvest of a fish that should be listed as an endangered species.

Thank you for your consideration.

-John

--

John Kirk
Montana Guided Fly Fishing LLC
john@montanaguidedflyfishing.com
www.montanaguidedflyfishing.com/
Cell: (406)-579-3871

KINGSLEY Lisa M * ODFW

From: Stan Steele <riverrunguide@yahoo.com>
Sent: Wednesday, October 20, 2021 10:46 AM
To: COMMISSION ODFW * ODFW
Cc: Oregon Anglers Alliance; Joel Strimling; asha swem; askew; Jerod Broadfoot; Wayne Endicott; Katelyn Lambert; Dominic Aiello; Doug Nichol; Jim Soares; Bev Hanson; Will Hanson; Donnie Nichols; jeffcomini@aol.com; annec@myway.com; Jon Fenton; Larry Newman; Ed Minalia; Scott Wood; Carl Berg; David Morgan; Cynthia Carlisle; Charles Carnahan; Don & Sandy Nichols; John Daniel; David Hastings; WALKER David; HURN Shannon M * ODFW; Shaun W. Robertson; REP SmithD; Boomer Wright; Bobby Levy; Derek J. Broman; Stan Steele
Subject: Letter of Interest
Attachments: Stakeholder comments, OFWC Oct. 15 mtg. (1).docx
Categories: Fish

Chair Wahl, Vice Chair Wolley and Commissioners,

Oregon's outdoor heritage sporting connected communities feel it is of great importance for each Commissioner to take a few minutes to read and ponder the thoughtful response to last Friday's RSP public input and Commissioner discussion!

The following attachment is a letter written to ODFW Executive Staff from Richard Heap, South Coast Stratum Work Group, regarding the ongoing controversy surrounding harvest of wild winter steelhead from an abundant population inhabiting Oregon's south coast river basins (over 95% of available habitat is occupied). If the focal species were changed from steelhead to beaver the narrative would be apropos for the Beaver Management Work Group. Please take a few minutes to read and I believe you will agree! Mr. Heap accurately identifies the "elitist attitude" and "any harvest is bad" influences that are increasingly dominating fish and wildlife management Work Groups and Commissioner led policy development discussions. Mr. Heap has granted permission to share.

United in Conservation,

Stan Steele 541-752-8350

Oregon Anglers Alliance
Oregon Outdoor Council
Oregon Trappers Association
Oregon Territorial Council on Furs
National Trappers Association
Fur Takers of America
Hunting Works for Oregon
Oregon United Sporting Dog Association
Stakeholder - Oregon Trap Check Work Group
Stakeholder - Oregon Beaver Management Work Group
Stakeholder - Mid-Coast Stratum - Coastal Multi-Species Management Plan Work Group

Rogue-South Coast Multi-Species Conservation and Management Plan

Post Oct. 15 OFWC Meeting Stakeholder Comments

Richard Heap

No public comment. I probably forfeited my credibility and opportunity to weigh in further on this plan by not speaking at the Commission meeting. I have learned several hard lessons about commenting when I am angry and, in this case, my better judgement prevailed. My anger built as it became clear that some of my fellow stakeholders were reverting to form, abandoning any pretense of cooperative solutions and were back to playing the game of positional and organizational “victory” at any cost. That anger peaked when the Chair invoked a two minute comment rule. I am a person who can’t give you my name and address in two minutes and I most certainly cannot provide meaningful and thoughtful comment on a topic this complex in two minutes. I understand the dilemma for the Commission when faced with over 80 commenters queued up, but I think most of us expected a full discussion and frankly I thought we deserved a little more respect for the work and effort we put into this process and I thought that stakeholders should have been given more time to express our views.

One of my problems is that I am old and have sailed the stormy seas of wildlife management for 50 years, many of those as either the captain or an officer on the ship. In all those years, I have fought the same battle over and over with elitist advocates who continually create unicorns out of ordinary native species in their quest to apply special and often exclusive regulations to keep, pick your term here; bankies, plunkers, bait fishermen, meat hunters, doe shooters, road hunters or some other “common” groups away from their prized species. We have so many “_____ Unlimited” that I have lost count. These folks seldom sought common ground with other resource users and preferred to have a wildlife Commission memorialize their belief system in the form of regulatory control over harvest activities. They organize, raise large sums of money through membership drives or banquets and focus on having more of what they glorify, but accessible only on their terms. And frankly they have been largely successful because most Commissioners don’t hear from most of their constituents, and they count on overwhelming the Commission with testimony and petitions. Plus, their offers to fund special programs that benefit their unicorn are pretty hard to resist for cash strapped public agencies. Since I have lived in Oregon and been active in the STEP program, I often marvel at the attention these special interest groups get and the disdain for the huge STEP effort because it often involves hatchery programs. That STEP effort is a huge testimony to the support of the state wildlife agency and the desire for active involvement in fishery programs. The unicorn folks will continually pick apart the agency, attack the data and analysis, publically undermine agency conclusions, and threaten Commissions with amassing public outcry or even lawsuits all the while expressing their desire to “help”. This elitist attitude was abundantly clear during the Commission meeting testimony. We heard from catch and release zealots from all over claiming some allegiance to Oregon’s “special” treasures and the sanctity of the south coast. I will admit that I am tired and have little appetite left for fighting and especially for being asked to swallow more of their Balderdash and by what I consider to be a very disingenuous engagement in the process.

So, what’s left now of “our” plan? If we are forced to accept mandatory catch and release regulations we probably don’t need the intense monitoring effort or the funding mechanism envisioned to support it. What is evolving here is not anything that I would accept as a stakeholder. Our discussions were never framed around catch and release becoming “management”. We clearly heard a limited desire for

mandatory catch and release, but without even a modicum of consensus. Most of us thought that a compromise of wild fish harvest limits was a concession to the concerns expressed, as was mixed emphasis areas and even the upward mobility of the conservation status AND we committed to living with what the data told us at the five year review. If we are confined to mandatory catch and release I think we all know the outcome at the five year review. There will be no actual data supporting the notion that harvest influenced population levels, but there will be claim of success irrespective of that by the catch and release crowd. Why? For the non-NGO casual supporters I think that can be best summed up with a quotation by Carl Sagan:

“One of the saddest lessons of history is this: If we’ve been bamboozled long enough, we tend to reject any evidence of the bamboozle. We’re no longer interested in finding out the truth. The bamboozle has captured us. It is simply too painful to acknowledge, even to ourselves, that we’ve been taken. Once you give a charlatan power over you, you almost never get it back.”

Non-harvest management is a self-fulfilling prophesy, particularly when harvest is not a limiting factor. No harvest is automatically better and any increase in numbers is automatically attributed to not killing fish. This has great potential to continue to produce “false positive” inferences, when the actual reasons for population fluctuations are often masked by the no harvest narrative. We will be told fishing is better because they say it is. In addition, we will have removed the “inconvenient truth” that has been true throughout this process: that harvest is not a limiting factor for these populations and we can test it on the south coast. I heard repeated comments about the John Day and Deschutes having depressed winter steelhead populations with no acknowledgement that those are and have been mandatory catch and release streams. To me, that was close to voicing a concern that the catch and release might not be the real answer. Couple that with the fact that steelhead populations across all jurisdictions and management strategies are showing similar downturns. The notion that we can somehow “manage” our way around habitat collapse continues to confuse the discussion. I didn’t listen to all of the testimony, but I wouldn’t be surprised to learn that someone dug the old dead cat out from under the sofa and invoked the Olympic Peninsula steelhead programs as living proof that unicorns do exist up there. The other success, for them, in going to mandatory catch and release is that we lose the control piece for what many of us feel is an opportunity to scientifically test the notion that exclusive regulations improve fish populations or produce larger fish. If we retain limited harvest of wild fish, we could do comparisons with non-retention streams to see if CPUE was substantially different. Many folks who fish both the Chetco (retention) and the Smith in California (non-retention) will tell you they don’t see a difference and I am unaware of any definitive studies that prove the point.

At this point, I feel we would be well served to pull this plan and start over with a discussion framed by a catch and release option vs. a retention option. I say this not because I’m afraid of “losing”, but because the public most affected by these decisions needs to be allowed to weigh in on a spectrum bounded by those options. I came into this process eager to help draft a plan similar to the Rogue SMU Fall Chinook product that I helped produce. That plan featured near unanimous agreement on most elements and a few points that were not unanimously agreed to but which did not warrant formal objection. Getting to that point was not easy and involved a two year effort and 22 meetings. All the stakeholders followed their commitment to support the final document. ODFW has used that plan as a living document and has met their commitment to monitoring, reporting and adapting regulations as prescribed. The RSP planning effort has produced a much different result in my mind. This has not been a unified effort by

the stakeholders to get to a settlement framework. Irrespective of the final version approved by the Commission, I don't feel there will be full commitment by all the stakeholders to support the final product. I applaud ODFW staff for trying to help us navigate the few contentious issues, but I don't believe there was a sincere effort made by some of the stakeholders to find some mutually agreeable solutions. My concern were certainly borne out on Friday and I am sure that will be even more evident in December unless we take another cut at this. If we are forced to be left with the product of yet another popularity contest as opposed to working until we get it to consensus, I see little value in using a stakeholder process in the future if it involves these same folks.

KINGSLEY Lisa M * ODFW

From: Oregon Anglers Alliance <OregonAnglersAlliance@outlook.com>
Sent: Wednesday, October 20, 2021 12:37 PM
To: randy hecker; Rich Heap; Joe Janowicz; steve beyerlin; tom hawkins; jeremyknapp11@gmail.com; andy martin; Brian Barr; maynard flohaug; grosjacquesd11@gmail.com; dave strahan; mike miller; webber@blackchapman.com; andy wright; COMMISSION ODFW * ODFW; LORION Chris M * ODFW; CLEMENTS Shaun * ODFW; Thomas Stahl; VANDYKE Daniel J * ODFW; steve.mazur@odfw.oregon.gov
Cc: HARRINGTON Michael R * ODFW; curt.melcher@odfw.odfw.oregon.gov
Subject: RSP Oct. 15 meeting summary and comment.
Attachments: RSP comment 10-20-21docx.docx

Categories: Fish

Fellow Stakeholders, OF&W Commissioners and Staff, Please see the attached document.

- Stakeholders worked hard and compromised on items with the condition that we would retain harvest. The WFEA's, increased fees for winter steelhead, and more. There was majority support for the two harvest recommendations. Now the Commission collectively see's themselves as the ultimate Stakeholder group that may very well go to catch and release with a 4 to 3 vote. They are to meet in private with ODFW Staff within the next few days. Date TBD. We've got to respond. This is an incremental attack on our harvest opportunities for all fish and wildlife. It is "Reimagining the governance of wildlife in America".
- If the plan is revised by the Commission so that mandatory catch and release and the Wild Fish Areas proposal to stop any future hatchery production are implemented, we will lose all of our harvest opportunity with the exception of about 10 miles of Chetco River hatchery presence. 80% will be shut down to hatchery production.
- There is no plan to compensate, or mitigate for the loss to our businesses, the angling public, or to our communities.
- Why did we invest all of this time and effort only to be second guessed by a Commission, after one Commissioner stated that she had very little knowledge of fish management issues. This is not good faith bargaining. Is this just the illusion of participation, or is the process valid? We'll see.
- This may further erode the public's faith and trust in governmental Fish and Wildlife management processes.
- Thanks to the Stakeholders who have submitted comment this week. For those that haven't, please take a moment to remind our Commissioners and ODFW Staff that major plan changes are not in the long-term best interests of the resource, or our communities.

ODFW.Commission@odfw.oregon.gov

Leonard Krug, South Coast Stratum Stakeholder
President, Oregon Anglers Alliance
541-659-0976



RSP Stakeholder Comment 10-20-21 Leonard Krug

Commissioners and ODFW Staff,

The Stakeholder process has taken a hard turn. After 2 years of time and effort, we understand that the Commission is poised to act as the ultimate Stakeholder group and circumvent the plan that incorporated over 40 qualified people to craft. The following are just a few reasons why we believe that altering this plan should not be a consideration.

1. Acceptance of this plan was contingent on a majority of Stakeholder opinion wanting to maintain harvest of winter steelhead.
2. This plan will essentially eliminate harvest of steelhead in the South Coast Stratum.
3. Although proposals were introduced to compensate for lost harvest of wild winter steelhead, there have been no allowances made to do so.
4. To remove harvest from a strong population with no biological basis to do may be cause for mitigation, or perhaps litigation from the business, angling public, and our communities. This will certainly cause cultural and economic losses to our people.

We ask that you extend every consideration to this process and allow the Stakeholder team to do their jobs as they were appointed to do.

Sincerely,
Leonard Krug
RSP Stakeholder

KINGSLEY Lisa M * ODFW

From: Bill Lansing <bill@billlansing.com>
Sent: Thursday, October 21, 2021 5:36 PM
To: COMMISSION ODFW * ODFW
Subject: Testimony before the Commission-attention Michelle Tate

Hello,

My name is Bill Lansing; I live at 93962 Bridge View Lane, North Bend, OR 97459. By way of introduction, I am the retired President and CEO of Menasha Forest Products Corporation once headquartered in North Bend, Oregon. My company owned 130,000 acres of timberland in Coos, Curry and Douglas counties and as such had considerable interactions with the OSFW staff. My company had invested money in various projects proposed by the various Watershed Councils in the rivers of southwestern Oregon for the improvement and enhancement of the anadromous fishery in the region. I personally have had a significant involvement in the various hatchery programs in the area. As such, I consider myself a stakeholder in any decision impacting the recreational fishing regulations in this region.

I am submitting my testimony on the Commission's deliberation on changing the winter steelhead regulations:

- I am opposed to any change in the current level of harvest of the winter steelhead in southwestern Oregon. Surveys by the ODFW staff have confirmed that the population and health of this species is more than adequate to retain the current level of take. The suggested plan to make the entire winter steelhead a catch and release program is unsupported by the science and patently irresponsible; and
- I further oppose the Wild Fish Area proposal to stop any hatchery fish production. If that occurs, we will lose any harvest opportunity we local stakeholders deserve; and
- It is beyond the time when the voices of local stakeholders are out-shouted by those who do not live within our region and/or have invested nothing in creating the improvement in the local fishery economies of our area. As I understand things, the Commission had made no plans to compensate or mitigate the loss of business by those who depend upon this fishery for their income, let alone the benefit to our local communities for family recreation. These people should be given consideration

Thank you,

Bill Lansing
541-269-1642

KINGSLEY Lisa M * ODFW

From: Bruce Blanthorn <bdb1037@gmail.com>
Sent: Thursday, October 21, 2021 6:47 PM
To: COMMISSION ODFW * ODFW
Subject: Fish Harvest

Respected Commissioners

I request your support of the Oregon Anglers Alliance in our mission to maintain 1/5 harvest. Please do not implement mandatory catch and release

Bruce Blanthorn

KINGSLEY Lisa M * ODFW

From: Matthew Lund <matthew.lund0@gmail.com>
Sent: Thursday, October 21, 2021 9:47 PM
To: COMMISSION ODFW * ODFW
Subject: Wild Steelhead Release on South Coast Rivers

I was just on the Rogue river this past weekend and hooked three steelhead, two of which where wild. I let them all go and the swan way with vigor. Originally, I had planned to be spending this past weekend on the North Umpqua River to fish there but due to low returns that river was closed for this summer season. The North Umpqua was not alone as other streams throughout the Pacific Northwest have been closed as well due to similar issues. The Olympic Peninsula, North Coast, Willamette Valley and Columbia Basin rivers and streams are struggling in a big way and will likely head to functional extinction if trends continue. Low steelhead returns are placing extra stress on rivers, fish and fisherman. With the south coast rivers being some of the few that remain open, more anglers such as myself will travel to the south coast to search for steelhead. Increased pressure, minimal real time fisheries management, and continue global warming suggest that now is not the time to continue the status qo but to seek greater conservative management if the South Coast Region and embrace at minimum catch and release of wild steelhead in this region and supportive management to insure that those catch and release fisheries remain healthy. The South Coast is not immune to the issues that have plagued rivers throughout the PNW. Catch and release of wild steelhead has been found a viable way to keep fish in the rivers and on spawning beds which allows future fish for the cycle to continue.

Thank you for this consideration.

Sincerely,

Matthew Lund

Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: curtiswhite <curtiswhite@bellsouth.net>
Sent: Friday, October 22, 2021 6:05 AM
To: COMMISSION ODFW * ODFW
Subject: Save Wild Steelhead

I am an avid angler who lives in Maine and has recently been bitten by the bug to catch a wild steelhead. I have visited your state and would like to return to explore and fish for wild steelhead.

Unfortunately, the numbers of returning wild steelhead is depressing and your current regulations do not do enough to protect them.

I truly hope the Oregon Department of Fish and Wildlife adopts a sustainable catch-and-release policy throughout southern Oregon (the whole state for that matter) and do away with the misguided management strategy that allows wild steelhead harvest on many of your streams. There is no need, nor good reason to kill them.

I liked Oregon and hope I do not have to go somewhere else to fish for wild steelhead.

Sincerely,
Curtis White

KINGSLEY Lisa M * ODFW

From: Dave Strahan <dstrahan@bigrocksports.com>
Sent: Friday, October 22, 2021 1:28 PM
To: COMMISSION ODFW * ODFW
Subject: Rogue South Coast Plan

Honorable ODFW Commissioners,

Please add my name to the list of Rogue South Coast Stakeholders that are frustrated with the apparent outcome of the Oct. 15 Commissioner's meeting, concerning the Rogue South Coast Management Plan.

All indications are that elements of the plan that include a very limited harvest of wild steelhead, and was sculpted over many hours of meetings and alleged collaboration, have been muted by a socially motivated outcry spawned by one or two of the Stakeholder's. It also appears that these opinions are based on less than accurate information from the groups in question, rather than the sound science that was presented in our several Stakeholder meetings. Also in jeopardy are the educated opinions of our local ODFW Biologists, in favor of opinions of those looking to stop all harvest of wild steelhead and salmon, while at the time reducing hatchery supplementation and raising the price of the privilege of fishing for salmon and steelhead.

While the groups in question make their livings pushing their agendas and motivating their members to speak out, the average angler's voices are not being heard, except thru the voices of some of the Stakeholders. That is why there was a very diverse group of Stakeholders convened to come up with a plan.

It is important to note that several of the elements of the plan were based on the compromise of including limited harvest, so to alter one element of the plan should include revisiting the entire plan, as most all elements were connected in the negotiation process.

It is my hope, and the hope of our Sportfishing Industry for the betterment of our economy, that the advice of our ODFW Biologists is heeded, and the collaborative trade offs of the Stakeholder group will be honored over the voices of those that were not part of the process that took place, nor were well educated by the volumes of information that we Stakeholders were provided. In the past, when science has shown the need to further limit or eliminate harvest within a specific watershed or region, the Northwest Sportfishing Industry has indeed supported such action. This is just not the case in this instance.

Respectfully,

Dave Strahan
Northwest Sportfishing Industry Association.



Dave Strahan

Territory Sales Manager

Southern Oregon/No. California

Big Rock Sports

541-226-6133

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KINGSLEY Lisa M * ODFW

From: mikemiller03@wildblue.net
Sent: Friday, October 22, 2021 8:42 PM
To: COMMISSION ODFW * ODFW; Steve Mazur; VANDYKE Daniel J * ODFW; LORION Chris M * ODFW
Cc: Leonard Krug
Subject: RSP Stakeholder Comments

ODFW staff and Commissioners. This is Mike Miller, Stakeholder on the South Coast.

I am very disappointed to hear that Commissioners are considering eliminating wild winter steelhead harvest or increasing the amount of catch and release winter steelhead fishing on the South Coast. Currently 93 percent of winter steelhead habitat is closed to the retention of wild winter steelhead. These fish are not at risk under the current management.

The harvest matrix of the plan is the key component that everything else is tied to.

If harvest opportunities are reduced I can no longer support this plan that I worked on for a year and a half.

Mike Miller

KINGSLEY Lisa M * ODFW

From: Diana Wilson <diana38_1986@hotmail.com>
Sent: Saturday, October 23, 2021 5:54 AM
To: ODFW RSP.Comments * ODFW
Subject: Rogue South Coast Multi-Species Plan - Public Comment

Dear ODFW Staff,

Thank you for the opportunity to comment on the draft Rogue and South Coast Multi-Species Conservation Management Plan (RSP).

In light of current climate conditions and a lack of monitoring data, the proposed angling regulations and harvest of wild winter steelhead greatly concern me. The Department does not have adequate adult spawner information and the impact of harvest on the wild winter steelhead in Rogue and south coast watersheds could prove disastrous for long term sustainability.

Because of this, I request the Department to proceed with Alternative A, "CnR" or Catch and Release regulations until a five year review of the RSP has been completed and adequate adult winter steelhead population estimates are available to inform harvest management.

To ensure harvest opportunity continues, I ask the department to increase the daily bag limit for hatchery fish for the identified management area.

I look forward to this management alternative moving forward and the department recommending this to the commission during their presentation in October of 2021.

Sincerely,
Diana Wilson
diana38_1986@hotmail.com 45303

KINGSLEY Lisa M * ODFW

From: Rich Simms <rich.simms@wildsteelheadcoalition.org>
Sent: Monday, October 25, 2021 4:38 PM
To: COMMISSION ODFW * ODFW
Subject: Biological and Economic Benefits of Wild Steelhead Release
Attachments: The Biological and Economic Benefits of Wild Steelhead Release.pdf

Dear ODFW Commission Members, I am writing today to share with you a white paper we published a number of years ago titled "Biological and Economic Benefits of Wild Steelhead Release". The document is attached with this email. Please read over as I believe much of the information is still relevant in striking a balance between conservation and recreation. This paper broke the ground for changing regulation in Washington towards releasing all wild steelhead. The key is to implement such a regulation or policy in a proactive manner before stocks collapse and/or when data is insufficient or in doubt . In Southern Oregon you still have an opportunity to be proactive with wild steelhead stocks deemed healthy and enact such a regulation while other stocks up the west coast and British Columbia are currently collapsing or at historic lows this year. The other thing to be cautious of is the Shifting Baseline Syndrome when anglers and the agency considers a population healthy. When we wrote this paper we heard many of the same arguments not to implement such a regulation,i.e., as no one will come and spend money in the region or that this only prefers one type of angler vs. another, etc. none of the arguments or concerns came true, anglers still came to spend money to fish rural communities, even more so, and anglers of various methods still came to fish. I hope you take the time to review this information and determine that it makes cautionary sense to move towards a wild steelhead release regulation when the rest of Steelhead Country is struggling. Thank you for your service to Oregon's Fish and Wildlife and taking time to read and consider my note.

RICH SIMMS

425.941.7041

FOUNDING BOARD MEMBER



www.wildsteelheadcoalition.org

The Biological and Economic Benefits of Wild Steelhead Release

Wild Steelhead Coalition

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WILD STEELHEAD RELEASE RECOMMENDATION

The Wild Steelhead Coalition recommends the adoption of an unconditional, statewide, wild steelhead release policy in Washington State. This policy would mandate that all wild steelhead caught by sport angling methods within Washington State be released unharmed, without exception.

EXECUTIVE SUMMARY

In May 2001, the Wild Steelhead Coalition initiated plans to extensively analyze the concept of unconditional statewide, wild steelhead release in Washington State. These plans called for consideration of a variety of perspectives, including those of public policy, ecology, economics, and law. Currently, the status of wild steelhead populations in Washington is grim. It is well known that there are a variety of problems facing wild steelhead throughout their life history, and that many factors now contribute to their current scarcity in abundance and distribution. Washington's Department of Fish and Wildlife now has the opportunity to fully implement statewide wild steelhead release, a policy shift that offers immediate benefits to wild steelhead populations and the sports fishing public. This report summarizes extensive research conducted by the Wild Steelhead Coalition concerning biological and economic benefits of statewide wild steelhead release.

This year (2001) represents a major cycle year for WDFW sport fishing regulation changes. Washington State now has the opportunity to strike a balance between resource conservation and recreational fisheries by fully implementing a statewide wild steelhead release

policy, without exceptions. Ever increasing fishing pressure, widespread alarming downward trends in wild steelhead population numbers, and a certain increase in the human population in the Pacific Northwest indicate that a regulation change is necessary. Furthermore, the 2001 Steelhead Anglers Survey indicates that in a scenario where the wild steelhead escapement exceeded spawning requirements, 61 % of anglers favored releasing wild steelhead (total of wild steelhead release and catch and release data).

A shift to wild steelhead release should not be viewed as a failure of management agency efforts, but rather a response to an increased understanding of steelhead ecology, a stronger focus on recreational opportunities and conservation, while acknowledging the risks inherent in continued wild steelhead harvests. The implementation of wild steelhead release is a positive response to the changing values of the fishing public and the increased pressure on a limited, shrinking, and irreplaceable natural resource.

This report is partitioned into 7 chapters, in which each chapter dissects and analyzes a component associated with wild steelhead release. Chapters 1 - 5 examine biological features, chapter 6 examines economic issues, and chapter 7 examines legal issues.

Chapter 1 examines Maximum Sustained Yield (MSY) management models. MSY is a theory for fish population dynamics that for several decades has influenced fishery management policies in many parts of the world. The MSY-model prompted major changes in fishery management in the mid-20th century, yet for the past few decades most major fishery policies have distanced themselves from pure-MSY doctrine because the concept has numerous

shortcomings. MSY shortcomings for recreational steelhead fisheries include invalid assumptions about: (1) steelhead ecology; (2) the economics of recreational steelhead fisheries; (3) data quality required for effective steelhead fishery management; and (4) the accuracy of environmental and fishery predictions.

Chapter 2 identifies the importance of genetic diversity in wild steelhead populations. Genetic diversity is the evolutionary foundation that allows populations to adapt to environmental changes, and provides resilience in wild steelhead populations as a whole through the development of diverse life histories. The genetic diversity maintained within populations has been passed from parent to offspring for thousands of generation. Wild steelhead harvest regulations selectively eliminate specific segments of a population by removing a high proportion of individuals within the open harvest time frame (commonly the early returning wild winter steelhead). This action alters the evolutionary future of populations because it reduces the number of adults that pass on their genetic material.

In **Chapter 3**, we examine the importance of repeat spawners in steelhead populations. Within streams of Washington and Oregon, the percentage of steelhead that spawn more than once average from 6 to 15 percent of the population. The great majority of these repeat spawners are female. In addition, repeat spawners carry almost 20 percent more eggs than first time spawners of comparable size. Hence, on good survival years, repeat spawners can be responsible for producing upwards of one third of the next year class of steelhead. The contribution of repeat spawners is one of the many buffers that steelhead populations use to cope with wide ranging variations in environmental conditions.

Proponents of catch and keep fisheries for wild steelhead offer the notion that wild steelhead released by anglers die or do not spawn successfully, and that the percentage succumbing to the stress of hook and line capture is unacceptably high. In **Chapter 4**, we report on key studies and data sets documenting hooking mortality in steelhead. The largest comprehensive study on hooking mortality was conducted on Vancouver Island, at which over 4,000 steelhead were angled on conventional gear from 11 rivers, over a 7-year period. Hooking mortality over this period was 3.6 percent. Mortality using various terminal gear types (barbed hooks and bait, barbs/no bait, barbless/bait, and barbless/no bait) ranged from 2.6 to 9.1 percent. Barbed hooks were found to contribute most to mortality. Studies examining out migrating kelts found little difference in the percentage of outmigrants that were hooked and released versus those that were not angled. In contrast, numerous review papers that present hooking mortality data in resident trout show mortality figures between 25 and 50 percent, clearly indicating that these studies cannot be used to determine the impacts of catch and release fisheries on non-feeding anadromous steelhead in rivers.

Region-wide wild steelhead release has been a common tool used by management agencies to protect dwindling stocks of wild steelhead in a number of jurisdictions, including British Columbia, Idaho, and Oregon. In **Chapter 5**, we report on the wild steelhead release management strategies found in British Columbia and Idaho. In both regions, state or province wide, wild steelhead release fisheries have been successful in reversing declining trends of wild steelhead populations. Changes in angler attitude toward wild steelhead release and sufficient hatchery supplementation were found to be important conditions for successful wild steelhead

release fisheries and maintaining a high amount of fishing effort. These conditions are presently in place within the State of Washington. In addition, both Idaho and British Columbia have smaller populations, lower numbers of licensed anglers, and a lower degree of encroachment on salmonid watersheds compared with Washington, yet we still allow the harvest of wild steelhead.

Chapter 6 discusses how wild steelhead release management offers increased recreational opportunities and economic benefits to local communities. The essence of the economic argument for wild steelhead release is that more anglers will be able to fish more often, and the angling experience for many will become more valuable. Hatchery steelhead can fill the need for harvest opportunities for both local and non-resident anglers (over eighty percent of the steelhead harvested in Washington is comprised of hatchery-origin fish), but a wild steelhead is far too valuable to be caught and kept. Evidence from other fisheries in North America and around the world support this position (several examples are cited).

Considering a statewide total release regulation for wild steelhead brings up the issue of foregone opportunity which is discussed in **Chapter 7**. Foregone opportunity raises the specter of tribal fishermen harvesting more than half of the harvestable portion of steelhead runs due to non-tribal fishermen not directly harvesting all of their half. However, this fear will likely go unrealized. Existing jurisprudence defines harvest as the opportunity to harvest, rather than the actual harvest, of allocated steelhead runs. A wild steelhead release regulation does not impair the non-tribal fishermen's opportunity to harvest their share of fish. Additionally, court cases indicate a policy to allow both tribal and non-tribal fishermen to decide what is the wisest and best use of their allocations, leaving the door open for Washington State to decide to leave their

share in the river to act as a conservation buffer and to generate the income inherent in a wild steelhead release fishery.

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Maximum Sustainable Yield: An Antiquated and High-risk Concept for Wild Steelhead Management

A Brief Historical Perspective on the *Maximum Sustainable Yield* Concept

Maximum Sustainable Yield, or *MSY*, is a theory for fish population dynamics that for several decades has influenced fishery management in many parts of the world. The *MSY* theory basically states the following: (1) there is a fixed functional relationship between the number of spawners and the number of viable offspring ("recruits"); (2) there is an escapement level, the so-called *MSY-population point*, that provides for maximal harvest by optimizing the number of recruits relative to a minimum number of spawners needed to produce those recruits; and (3) setting harvest rules to maintain escapements at the *MSY* population point provides for a never-ending maximum sustainable yield. The tenets of *MSY* were developed by fishery scientists in the mid-20th Century.

In the 1950's and 1960's many fishery management agencies incorporated *MSY* principals into policy. The 1958 International Law of the Sea, for instance, adopted *MSY* as the goal of international fishery management (Christy and Scott 1965). At the time, the *MSY* concept was an attractive alternative to existing management policies because it promised objective science-based guidance for setting harvest rates while offering long-term protection for the targeted fish population (Nielsen 1976). It is widely recognized that the early implementation of *MSY*-influenced policies heralded an important shift to science-based fishery management (Larkin 1978).

Although the MSY concept spurred an historic shift in mid-20th century fishery management paradigms, MSY shortcomings have long been evident. From an ecological perspective one of the key assumptions underlying the MSY concept is that a target population can be treated as an isolated stock, yet no credible ecologist would dare argue that any wild fish population exists in a vacuum. The MSY concept is restricted to fish population dynamics, yet from a socio-economic perspective, no credible policy-maker would dare to claim that biology was the only important factor guiding fisheries management. An extensive literature on the dysfunctional politics and socio-economics of commercial and sport fisheries was well developed by the 1950's (Nielsen 1976).

The MSY concept assumes that environmental variations are accounted for in the data used to develop stock-recruit relationships, yet these data are generally so limited in time coverage and quality that developing stock-recruit relationships is often more art than science.

For steelhead, changing environmental conditions are a major source of error in run-size forecasts. Both short-term and long-term variations in stream and ocean conditions can drastically alter productivity from one year, and even one decade, to the next. From an environmental prediction perspective, no credible climate forecaster or fish biologist would dare argue that there is strong predictability for the always changing environmental conditions that influence steelhead productivity one year to the next. Each of these problems with the MSY concept, as well as many others, have been well-documented for decades (Larkin 1976).

In the 1970's the concept of *Optimal Sustainable Yield*, or OSY, was developed as a response to the widely acknowledged shortcomings of the biologically-isolated MSY concept. The OSY concept has been defined by Roedel (1975) as:

A deliberate melding of biological, economic, social, and political values designed to produce the maximum benefit to society from stocks that are sought for human use, taking into account the effect of harvesting on dependent or associated species.

The US Magnuson-Stevens Fishery Conservation and Management Act of 1976 recognized the multi-faceted nature of fisheries and adopted Optimum Sustainable Yield as the guiding principal for federally managed commercial fisheries. Section 28 of the Magnuson-Stevens Act defined OSY principles in the following way:

- (A) [OSY] will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems;
- (B) is prescribed as such on the basis of the maximum sustainable yield from the fishery, as reduced by any relevant economic, social, or ecological factor; and
- (C) in the case of an overfished fishery, provides for rebuilding to a level consistent with producing the maximum sustainable yield in such fishery.

In 1996 the Sustainable Fisheries Act (SFA) became Federal law. The SFA amended the Magnuson-Stevens Act to include numerous provisions requiring science, management and

conservation action by the National Marine Fisheries Service (NMFS). In the SFA *Optimum* was defined explicitly as follows:

OPTIMUM: The definition has been revised (in (28)(A)) to require considering the protection of marine ecosystems in setting optimum yield. It clarifies (in (28)(B)) that social, economic, or ecological factors may be used to set OY lower than the maximum sustainable yield, but not higher. And it specifies (in (28)(C)) that, for an overfished fishery, the OY must provide for rebuilding to a level consistent with producing the MSY (NOAA 1997: <http://www.nmfs.noaa.gov/sfa/sfaguide/index.html>).

Now consider the joint Washington Department of Fish and Wildlife/Tribal *Wild Salmonid Policy* of 1997¹. Washington's Wild Salmonid Policy is wedded to MSY, albeit under the label *Maximum Sustainable Harvest (MSH)*, as evidenced by the Spawning Escapement Policy guidelines stated below:

1. In each watershed region, for each species, populations and/or management units to which MSH management will apply shall be identified and the pertinent management agencies shall establish escapement goals designed to achieve MSH. MSH shall be calculated by using long-time series of accurate spawner and recruit statistics for each population. When such statistics are not available, MSH may be calculated by using historical production, habitat availability, or the best available methods for calculation.

¹ Currently, WDFW has a statewide wild steelhead release rule. Exceptions to this rule are allowed where WDFW believes runs are healthy enough to sustain recreational harvest. During the 2000-2001 season there were 16 exceptions on the coast and in Puget Sound. During the 1999-2000 season there were 35 exceptions to the wild steelhead release rule.

2. The State and Tribes will seek agreement on the total escapement rates, escapement levels, or escapement ranges that are most likely to maximize long-term surplus production for wild populations or combinations of wild populations or management units. These rates, levels, or ranges will be based upon achieving MSH and will account for all relevant factors, including current abundance and survival rates, habitat capacity and quality, environmental variation, management imprecision and uncertainty, and ecosystem interactions. (WDFW/Tribal Wild Salmonid Policy, 1997).

The first provision of this section of the Wild Salmonid Policy specifies MSH/MSY as the guiding principal for establishing wild salmonid escapement goals. The second provision states that MSH will account for "*all relevant factors*." Given today's understanding of steelhead ecology, environmental variability, and steelhead data quality, is it possible to accurately account for all relevant factors impacting steelhead productivity? Given today's understanding of the ecology of steelhead and the socio-economics of steelhead fishing, is MSH even desirable?

One does not have to dig very deeply to confidently answer "NO" and "NO" to those two important questions. Based on the present day understanding of steelhead ecology and the socio-economics of steelhead fishing, there is no justification for MSY-management of any wild steelhead stocks in Washington State. Recently published critiques by Gayeski (2001) and Redman (2001) highlight major deficiencies of MSY steelhead management in Washington State. Some of the major deficiencies with MSY-guided management for wild steelhead are listed and discussed in detail below.

Deficiencies With MSY-management for wild steelhead

While the MSY concept has provided a means for a data and theory-driven computation for harvest and escapement goals, the foundations for this concept as the primary consideration for fishery management have long been known to rest on very shaky ground. In this section major deficiencies are discussed from the perspectives of ecology, economics, environmental prediction, and data quality.

A. Ecology:

- In its use by the Washington Department of Fish and Wildlife, the MSY concept assumes that all fish of the same stock are biologically equal. WDFW models the abundance for stocks at the level of major river basins (for example, Skykomish River winter runs or Sol Duc River summer runs). This assumption is invalid for several reasons (see Gayeski 2001, and Ostberg (this volume)):
 1. Most wild steelhead populations contain distinct sub-stocks that utilize different parts and/or tributaries of the same basin, sometimes migrating and spawning at different times. Because sub-stocks are likely to have different productivity levels, MSY harvest rates for major river basins are excessive, even by MSY standards, for the least-productive sub-stocks in those basins.
 2. In any year, wild steelhead spawners typically have multi-age and overlapping generations, with repeat spawners typically being the most productive spawners. Harvest rates on repeat spawners are therefore exceptionally high, as this cohort is

subjected to intense fishing pressure in multiple seasons. Over time, the presence of kill fisheries reduce a population's age-structure diversity and eventually produce a population with an earlier average age at maturity.

- MSY offers no consideration for ecosystem impacts of harvest, and assumes that spawners in excess of the MSY escapement target are "waste."
- 1. As noted above, wild steelhead populations contain distinct sub-stocks that likely utilize stream habitat in ways that distinguish them from other sub-stocks. Such uses are likely to include adult return and spawn timing, spawning and rearing locations, and smolt migration timing. Each of these differences contributes to life history diversity as expressed by varying time-space habitat use. Life history differences within and between nearby populations are evolved traits that buffer wild steelhead metapopulations from environmental uncertainty, such as floods, droughts, mudslides, variable ocean conditions, etc.
- 2. Other species that utilize the same habitat are clearly sensitive to the absence or presence of spawning steelhead. For example, decomposing adult steelhead carcasses contribute significant nutrients to streams and riparian zones and nourish other generations of steelhead rearing in those streams.

B. Economics:

- MSY policies implicitly assume that maximizing harvest is the best use of the steelhead resource. For recreational fisheries, this assumption is clearly at odds with reality (see Jenkins, this volume).
- 1. Maximizing harvest is not necessarily relevant to the value of recreational fisheries. Washington steelhead are ruled a gamefish, and have been recognized as such for decades. *The MSY concept is born of a food-production (commercial fishing) mindset.* Based on economics alone, the value of a fishery should be evaluated in terms of fishery income, not fish harvested, and should argue for *Maximum Sustainable Income*. Based on the socio-economics of recreational fisheries, management goals should focus on *Maximum Sustainable Recreation* (Larkin 1976).

C. Data Quality:

- Effective identification of the MSY harvest and escapement levels requires a long-history of accurate escapement, harvest, habitat and recruitment data. Long time series (a few to many decades) of high quality steelhead and habitat data simply do not exist.
- 1. Because of difficulties in monitoring, strong year-to-year and decade-to-decade changes in stream and ocean conditions, and the varying impacts of fishing and hatchery practices, such data simply do not exist for any Washington stock of

wild steelhead. The data that does exist is biased by the long-term presence of intense harvest rates throughout the data collection period. These collections of data likely offer a severe underestimate of the productive potential of Washington streams (Gayeski 2001).

D. Environmental Change and Prediction:

- MSY stock-recruit models assume an unchanging environment, yet this assumption is clearly invalid based on an abundance of evidence for climate-related time-varying stream and ocean impacts on steelhead survival (Coronado-Hernandez 1997; Pearcy and Mantua 1999; Smith and Ward 2000). Today's harvest rules are based on run-size predictions that are validated after harvest fisheries take place. For streams with wild steelhead harvest seasons, the lack of systematic in-season, or pre-season, run-size assessments means that over-predictions for adult returns promote overharvest.
- 1. Successful application of the MSY concept, at least in terms of allowing harvest while avoiding overfishing (to escapements lower than the MSY target), requires an accuracy in pre-season run-size forecasts that do not exist.
- 2. While it is possible to monitor streams to track smolt populations, prospects for pre-fishery monitoring of smolt-to-adult survival rates are very poor. Likewise, on the majority of streams there is no system for in-season run-size assessments (the mainstem Columbia and Snake Rivers being exceptions).

3. There is no demonstrated capability for skillfully predicting year-to-year changes in smolt-to-adult survival rates for steelhead. Such predictions may be possible, but a lack of data and a lack of understanding of how changing estuary and ocean conditions impact smolt-to-adult survival rates provides a major barrier that must be overcome. Likewise, a distinct lack of predictability in the climate system also poses a serious barrier to predicting smolt-to-adult survival rates.

Summary

While the history of fishery management has been shaped by aspects of the MSY concept, using MSY as a primary basis for fishery management is a practice whose time has passed. Groundbreaking treaties like the 1958 International Law of the Sea embraced MSY as a goal for international fishery management. Yet, for the past 25 years federal commercial fishery policies have explicitly identified MSY as a means for identifying an absolute upper limit on harvesting. Federal harvest policies are now formed after considering MSY and other important ecological, socio-political, and economic factors. In contrast, Washington State continues to identify MSY as the harvest goal for wild salmonids.

The long list of MSY/MSH steelhead management problems reviewed here and by many others begs for significant reforms in Washington's wild steelhead harvest policies. Wild steelhead management policies based on MSY lack critical scientific and socio-economic justifications. A wealth of evidence and experience paints MSY as an antiquated and high-risk

basis for managing wild steelhead fisheries. In addition, this concept is based on a commercial fishing/food production world view. Even commercial fishery policies have backpedaled from pure MSY doctrines for the past 25 years. Because there are many important dimensions to the recreational wild steelhead fishery in Washington State, the MSY model is simply inappropriate.

A review of wild steelhead fisheries in Washington State highlights numerous failures of the present MSY management model. The very low wild winter-run steelhead escapements to north Puget Sound river basins in 2000 and 2001 (WDFW 2000) and the subsequent closures of spring catch-and-release fisheries in 2001 highlight some of the risks inherent in the MSY approach.

Based on escapement estimates for parent years and expectations for stable productivity, WDFW allowed wild steelhead harvests in December 1999-February 2000 when in fact the run size was much lower than predicted. The result? Overfishing, and for some populations the lowest wild steelhead escapements on record.

Escapements for several north Puget Sound rivers were not met in 2000, nor in 2001, in spite of the fact that the parent generations for these returns had met MSY spawning escapement goals. The long-term consequences of overfishing in 1999-2000 will not likely be known for many years. The short term consequences have included complete closures for March-April wild steelhead release seasons for north Puget Sound rivers in 2001 and may be repeated for at least the 2002 season.

The WDFW management response to poor escapements, in addition to the closures, has been limited to little more than a collective hope that productivity and the depressed populations will rebound sometime in the future.

The WDFW has issued many similar emergency closures to halt harvest fisheries from taking wild steelhead *after* significant harvests had impacted low numbers of returning spawners. An internet search on the WDFW web-site for "emergency closures" for wild steelhead yields this list for the period since 1997:

Winter Steelhead Emergency Closures

- Hoh River, January 28, 1997
- Puyallup River, March 14, 1997
- Humptulips/Chehalis Basin, November 26, 1997
- Humptulips and Hoh Rivers, February 24, 1998
- Puyallup River, November 19, 1998 (rule change to wild steelhead release)
- Skagit, Sauk, Stillaguamish, Skykomish, Snoqualmie, Snohomish, Puyallup, and Carbon Rivers, November, 2000

Summer Steelhead Emergency Closures

- Lewis and Kalama Rivers, September 16, 1997
- Wind River, August 27, 1997

It seems that the preferred management method has been to put the “burden of proof” on the spawners, which are typically counted well-after the harvest season has finished, while putting faith in the agency's pre-season run-size forecasts. When those forecasts overestimate returns and subsequent harvests further depress escapements, the agency has consistently responded with emergency closures. The net result is a lose-lose combination: imperiled fish stocks and lost fisheries.

Relative to status quo policies, Washington State now has the opportunity to strike a much better balance between recreational opportunities and resource conservation by eliminating wild steelhead harvest and offering more catch-and-release opportunities. The benefits of such a policy shift are clear: it would significantly reduce the risks of overfishing the few remaining healthy Washington State wild steelhead populations while still providing recreational opportunities. For years, wild steelhead harvests have allowed for an unacceptably skewed trade-off favoring the risk of overfishing for the sole benefit of providing harvest opportunities for a relatively small number of ecologically valuable fish. This situation has continued in spite of the fact that recent years have seen more than 80% of Washington's steelhead harvest derived from marked hatchery fish.

In conclusion, the case for MSY/MSH wild steelhead management is simply too weak to support its continued use. In many situations, wild steelhead release seasons provide an acceptable and attractive trade-off between offering recreational opportunities and protecting valuable fish stocks.

It is also clear that wild steelhead release seasons are not a cure-all for the problems faced by Washington's wild steelhead, just one step in a positive direction. Habitat restoration, with a focus on realizing some of the lost potential for wild steelhead production in Washington's once famous but now much diminished steelhead rivers, must also become a high priority for WDFW if their hopes for improved wild steelhead returns are ever to be realized.

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Genetic Diversity of Wild Steelhead

All species live in constantly changing environments. To overcome environmental fluctuations, it is essential for species to exploit all available habitat. The long-term existence of a species is maximized through the adaptation of numerous populations and sub-populations to specific environmental conditions. These adaptations have evolved over hundreds and thousands of generations in concert with a natural, fluctuating environment. As the environment changes so does the composition of individuals within a population. While the environment acts as a changing variable to individuals within a population, the one constant is that individuals pass their genetic makeup, which includes chromosomes, genes, and non-coding regions of the genome, to their offspring. This inherited genetic material is passed from one generation to the next as the foundation upon which individual uniqueness and population differences are maintained and is known as genetic diversity.

The genetic diversity maintained within a species is a genetic reservoir upon which natural selection acts. Populations with unnaturally altered or low levels of genetic diversity can be stripped of their evolutionary future because their ability to respond to changing environments has been reduced. Loss of genetic diversity can lead to reductions in fitness and decrease an individual's ability to adapt to environmental changes. Fitness is a measure of an individual's potential to produce viable offspring. Fitness reductions can be caused by either inbreeding or genetic drift. Inbreeding is often observed in populations with low numbers of mating individuals, and occurs when closely related individuals mate as opposed to unrelated

individuals. Inbreeding often increases the frequency of deleterious genes within a population. A classic example of inbreeding and its effect is the lethal genetic disease hemophilia within the European monarchies, most notably Queen Victoria of England and her descendents.

Genetic drift can be described as random changes in gene frequencies within a population. Mechanisms of genetic drift include straying or migration of individuals into a different population and is often viewed as a means of maintaining the genetic diversity of populations. However, when populations are small, the potential exists for locally adapted genes to be swamped out by non-local, non-adapted genes contributed by strayed individuals.

When the genetic diversity of a population is reduced, the ability to adapt and confront environmental pressures and changes is also reduced because there are fewer gene combinations represented in the population, ultimately leading to a reduction in the evolutionary potential of the population. In other words, loss of genetic diversity increases the probability that a population will not overcome environmental changes because the individuals within a population are genetically more uniform to each other than in a diverse population that is represented by a wide range of genetically unique individuals. Thus, genetic diversity is the framework that leads to individual differences within a population of any given species.

Salmonids are highly adapted to their environments due to natural selection of the most viable and fit individuals. The homing behavior of salmonids to their natal streams (Donaldson and Allen 1957; Lindsey et al. 1959; Hartmen and Raleigh 1964) has allowed populations to perpetuate genetic, behavioral, and life history differences specific to their environments.

Specific adaptations of salmonids to their native environments have produced a wide array of life history traits and populations (Miller and Brannon 1981). These include adult return time, spawning time, egg incubation, fry emergence from the gravel, residence time, and migration patterns (reviewed in Groot and Margolis 1991).

The amount of genetic diversity necessary to maintain natural, wild populations is unknown, but likely depends on a number of factors including the population, species, and environmental conditions. Genetic diversity is important because it increases the abundance of a given species since many populations exploit diverse habitats in unique ways. Furthermore, it spreads populations across many environments so that fewer populations will be adversely affected by environmental crises or catastrophes.

Common sense suggests that we should expect extensive genetic diversity in salmonids because of the diverse habitats in which they are found. Examples of genetic diversity in steelhead include resistance to the parasite *Ceratomyxa shasta* within the Columbia River (Buchanan et al. 1983), protein differences between inland and coastal steelhead (Allendorf 1975), protein differences among populations in British Columbia (Parkinson 1984), Washington (Reisenbichler and Phelps 1989), and Oregon and California (Reisenbichler et al. 1992), nuclear DNA differences between Fraser, Thompson and Columbia River steelhead (Beacham et al. 1999), nuclear DNA differences between inland and coastal steelhead (Young et al. 2001), and chromosomal differences between steelhead in the Puget Sound, Strait of Juan de Fuca and

Washington Coast (Ostberg and Thorgaard 1999) and throughout their native range (Thorgaard 1983).

The genetic diversity of fish can be altered in many ways. Prior to the settlement and exploitation of western North America by European settlers, natural catastrophes such as active volcanism, ice ages, flooding events, diseases, and poor ocean conditions, shaped and molded the genetic diversity of salmonid populations resulting in survival of the most fit individuals and causing unfit individuals or populations to perish. As the West was settled by European immigrants, salmonids were faced with an onslaught of anthropogenic-caused catastrophes, including overharvest, habitat degradation, and development (for a review see Lichatowich 1999).

The future of wild salmon and steelhead stocks within western North America is indeed uncertain. Nehlsen et al. (1991) described 214 native salmonid populations within California, Oregon, Idaho, and Washington as at risk or special concern of becoming extinct due to drastic reduction in population size. Furthermore, the Salmon and Steelhead Stock Inventory (SASSI) report produced by Washington Department of Fish and Wildlife (WDF 1993), lists 36 steelhead stocks as healthy, 44 as depressed, 1 as critical, and 60 as unknown. In response to the depressed and declining status of salmonids in Washington State, the Washington Department of Fish and Wildlife developed the Wild Salmonid Policy in which it states: “The purpose of the proposed Wild Salmonid Policy (WSP) is to protect, restore, and enhance the productivity, production, and diversity of wild salmonids and their ecosystems to sustain ceremonial, subsistence, commercial

and recreational fisheries; non-consumptive fish benefits; and other related cultural and ecological values” (WDFW 1997).

Fisheries that selectively harvest a population of fish with a specific trait or characteristic can reduce the genetic diversity of that population by lowering their fitness and adaptability. Numerous examples exist in which commercial salmon fisheries have altered their target populations. These include a shift in return time for pink salmon on Barnoff Island in Northeast Alaska (Alexandersdottir 1987), a shift in return time for coho salmon to the Clackamas River, Oregon (Cramer and Cramer 1994), and a reduction in the mean spawning age of chinook salmon by at least 0.7 year since the turn of the century in the Klamath (Hankin and McKelvey 1985) and Sacramento (Reisenbichler 1986) Rivers. Likewise, sport fisheries that selectively harvest a portion of a wild run alter the natural genetic diversity by reducing the number of individuals returning during the harvest period.

Steelhead are generally separated into two distinct races, summer steelhead which migrate into fresh water in May - October and mature in the freshwater, and winter steelhead which migrate into fresh water November - May and mature in the ocean. In Washington State, adult wild winter steelhead typically begin entering fresh water from late November through May and spawn between February and June (WDF 1993; Busby et al. 1996). For example, in Figure 1 a substantial portion of the wild winter steelhead population begins returning to the Quinault River as early as the beginning of December (50th statistical week) and continues to return later than the last week of April (18th statistical week).

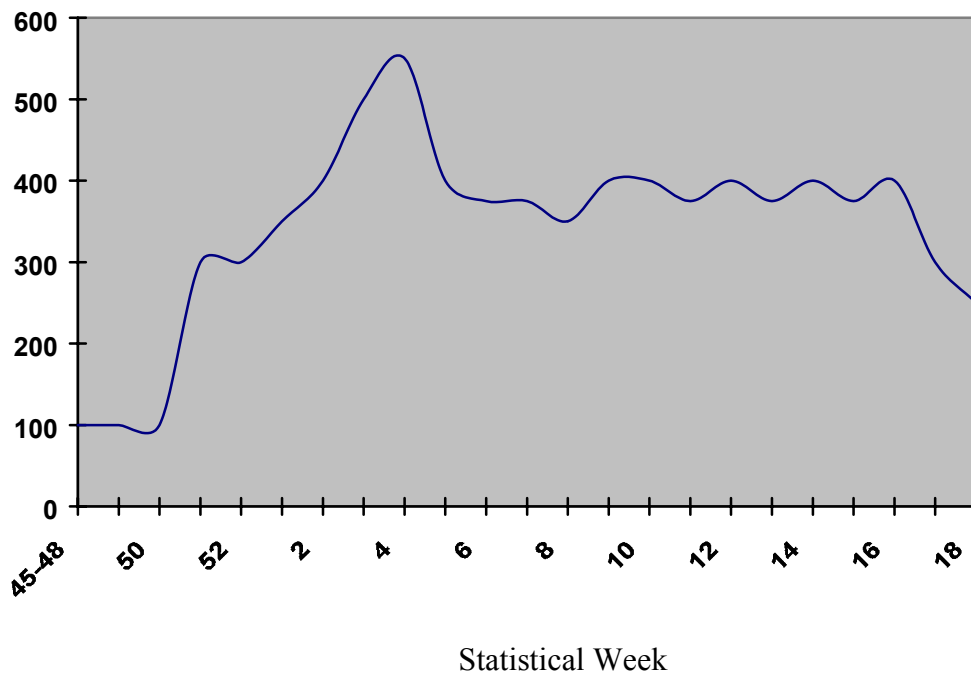


Figure 1. Adult wild winter steelhead return to the Quinault River, WA. The X-axis represents the statistical week (statistical week 1 corresponds to the 1st week in January) and the Y-axis represents the number of returning wild steelhead (Figure modified from Reisenbichler 1997).

Coinciding with the adult fresh water migration time, many rivers in Washington State are managed by wild steelhead harvest regulations (2000/2001 Washington State sport fishing rules pamphlet). The cut off date for harvest of wild winter steelhead varies between rivers, but generally is either the last day in February (9th statistical week), March 15, March 31, April 15, or April 30. Effectively, Figure 1 demonstrates that all wild winter steelhead populations that are

managed for harvest are being selectively harvested because only a portion of the run is being harvested. The harvested portion of the run is always the earlier returning steelhead. Thus, WDFW is not managing to “to protect, restore, and enhance the productivity, production, and diversity of wild salmonids and their ecosystems” as stated in the Wild Salmonid Policy (WDFW 1997). With this policy harvest rates are appropriate for hatchery populations, but these same rates are clearly excessive for early-returning segments of the wild steelhead population. After multiple generations, this type of fishery alters the genetic and life history diversity of the population as a whole.

Spawning migrations of adult steelhead occur throughout the year. In large rivers such as the Columbia, Rogue, and Klamath, adult wild steelhead migrate at all times of the year (Busby et al. 1996). In streams containing both summer and winter steelhead, summer steelhead typically spawn higher in the systems than winter steelhead (Behnke 1992). Studies on the Kalama River, WA, indicate that there is little gene flow between wild summer and wild winter steelhead which suggests that these races are nearly reproductively isolated (Leider et al. 1984, Sharpe et al. 2000).

Many of the Pacific salmon species are also separated into discrete races depending upon their adult migration time. Generally, salmon that return earlier spawn higher up in river systems than later returning salmon (Groot and Margolis 1991). Winter steelhead spawning migrations effectively occur over a seven month period (November - May). It is unknown if earlier returning winter steelhead spawn higher up in river systems than later returning steelhead, although anecdotal evidence from steelhead guides from Forks, WA, indicate that later returning

steelhead in the Sol Duc River spawn in the lower reaches of that river. Since there is nearly a seven month adult migration period for winter steelhead, it is conceivable that temporal and spatial spawning hierarchies can exist, and that spawning clines within river systems occur that represent the span of winter steelhead return time. In other words, the earliest returning winter steelhead spawn furthest upstream and as adult return time continues through winter and spring, the adults progressively spawn further down the river system. This may be an evolved steelhead behavior since the evolutionary success of a species is reflected by how well it exploits all available habitat.

The effects of wild steelhead harvest within any population hierarchy is unknown, however the potential exists for overharvest of early spawning populations. The proportion of a wild steelhead population harvested by sport anglers within a specific angling season, the wild steelhead exploitation rate, deserves analysis. The exploitation rate of wild steelhead within any given river represents the number of fish harvested up to a specific date. The majority of rivers that are managed under wild steelhead harvest are open for harvest until the last day of February.

However, only a proportion of the population has actually entered the freshwater by the end of February (Figure 1). For example, suppose a population consists of 2000 total individuals, a fishery exists for this population that is managed as wild steelhead harvest until the last day in February, and there is a 25 % exploitation rate (500 individuals harvested by sport anglers) on the population. If 50 % of the population (1000 individuals) return before the end of February, then half the individuals (500/1000) that return before the end of February will be harvested. Likewise, if 35 % of the population return before the end of February (700

individuals), then over 70 % of the individuals (500/700) that return before the end of February will be harvested. In other words, 100 % of the harvest is not spread out through a population, but rather is generally spread through less than 50 % of the population. Thus, early returning steelhead are disproportionately harvested and this action is contradictory to WDFW's Wild Salmonid Policy (WDFW 1997). Since wild winter steelhead return to their natal river between November and May, early returning steelhead can become exploited at extremely high levels by wild steelhead harvest management.

The natural diversity in steelhead run timing exists for a reason and it is irresponsible conservation management to shorten or change the run timing of wild steelhead by selective overharvest. Tables 1, 2, and 3 summarize the exploitation rate of wild winter steelhead in five different areas. Currently, the Hoko River has wild steelhead harvest until March 15, and the Pysht, Green, Skagit, and Pilchuck Rivers have wild steelhead harvest until the last day in February. Calculated in this way, the exploitation rates listed in these tables are misleading in terms of the true impact on the early segments of any river system's wild steelhead population, since the harvest is concentrated in the early-season when only a small portion of the total year's spawners are in the river. Actual harvest rates for the harvest seasons are clearly much higher than the rates listed here. The early-season harvest policies now used by WDFW subject the early returning population segments to harvest rates appropriate for hatchery steelhead; such rates are unacceptably high for wild steelhead, and the resulting compression of life history and genetic diversity is at odds with the Wild Salmonid Policy.

Table 1. Total wild winter steelhead escapement, harvest, and exploitation rates in the Hoko and Pysht Rivers, WA.^a

Hoko River, escapement goal = 400				Pysht River, escapement goals have not been established		
Year	total escapement	wild steelhead sport harvest	wild steelhead exploitation rate (%) ^b	total escapement	wild steelhead sport harvest	wild steelhead exploitation rate (%) ^b
1986-87	792	198	20.0	360	228	38.8
1987-88	913	142	13.5	445	173	28.0
1988-89	699	115	14.1	254	149	37.0
1989-90	770	102	11.7	265	94	26.2
1990-91	861	44	4.9	242	47	18.9
1991-92	374	84	18.3	200	153	43.3
1994-95	-	68	14.5 ^c	-	98	-
1995-96	-	110	21.6 ^c	-	70	-
1996-97	-	214	34.9 ^c	-	136	-
1997-98	-	25	5.9 ^c	-	10	-
1998-99	-	95	19.2 ^c	-	71	-
1999-00	-	134	25.1 ^c	-	52	-

^a Data from WDF (1993) and Washington Department of Fish and Wildlife, steelhead harvest summaries.

^b For known escapement, wild steelhead exploitation rate = wild steelhead sport harvest/(total escapement + wild steelhead sport harvest).

^c For unknown escapement, wild steelhead exploitation rate = wild steelhead sport harvest/(escapement goal + wild steelhead sport harvest).

Table 2. Total wild winter steelhead escapement, harvest, and exploitation rates in the Green River (King Co) and the Skagit River system, WA.^a

Green River, escapement goal = 2000				Skagit River system, escapement goals have not been established		
Year	total escapement	wild steelhead harvest	wild steelhead exploitation rate (%) ^b	total escapement	wild steelhead harvest	wild steelhead exploitation rate (%) ^b
1977-78	1077	789	42.3	5757	371	6.1
1978-79	1385	307	18.1	2982	240	7.5
1979-80	1586	492	23.7	5288	799	13.1
1980-81	1083	597	35.5	4308	1105	20.4
1981-82	2121	489	18.7	9609	1023	9.6
1982-83	1526	658	30.1	7732	666	7.9
1983-84	2188	66	2.9	8963	296	3.2
1984-85	2286	306	11.8	8603	1435	14.3
1985-86	2778	568	17.0	11098	1916	14.7
1986-87	1685	652	27.9	8305	1895	18.6
1987-88	2378	556	19.0	13194	1873	12.4
1988-89	1916	882	31.5	11854	1905	16.1
1989-90	1466	1094	42.7	10017	1351	11.9
1990-91	944	155	14.1	6174	637	9.4
1991-92	1868	113	5.7	7514	53	0.7

^a Data from WDF (1993) and Washington Department of Fish and Wildlife, steelhead harvest summaries.

^b For known escapement, wild steelhead exploitation rate = wild steelhead sport harvest/(total escapement + wild steelhead sport harvest).

^c For unknown escapement, wild steelhead exploitation rate = wild steelhead sport harvest/(escapement goal + wild steelhead sport harvest).

Table 3. Total wild winter steelhead escapement, harvest, and exploitation rates in the Pilchuck River, WA.^a

Pilchuck River, escapement goals have not been established			
Year	total escapement	wild steelhead harvest	wild steelhead exploitation rate (%) ^b
1980-81	490	135	21.6
1981-82	657	127	16.2
1982-83	779	228	22.6
1983-84	930	22	2.3
1984-85	1706	6	0.4
1985-86	1644	5	0.3
1986-87	1416	162	10.3
1987-88	1424	215	13.1
1988-89	1650	203	11.0
1989-90	1124	176	13.5
1990-91	968	127	11.6
1991-92	1582	208	12.2

^a Data from WDF (1993) and Washington Department of Fish and Wildlife, steelhead harvest summaries.

^b For known escapement, wild steelhead exploitation rate = wild steelhead sport harvest/(total escapement + wild steelhead sport harvest).

^c For unknown escapement, wild steelhead exploitation rate = wild steelhead sport harvest/(escapement goal + wild steelhead sport harvest).

It is important to note that in many areas that are open to wild winter steelhead harvest, spawning escapement is not monitored nor have escapement goals been established (WDF 1993). Thus, it is unknown what effects wild steelhead harvest has on these populations nor is it known what proportion of each population is being harvested (Table 4).

Table 4. Wild steelhead harvest in creeks or rivers in which spawning escapement is not monitored and escapement goals have not been established.

Angling season (year)	Goodman Creek	Mosquito Creek	Tolt River	Sultan River	Wallace River
1986 - 1987	30	19	-	-	-
1987 - 1988	57	18	-	-	-
1988 - 1989	45	6	-	-	-
1989 - 1990	46	12	-	-	-
1990 - 1991	14	0	-	-	-
1991 - 1992	15	6	-	-	-
1994 - 1995	26	0	2	3	6
1995 - 1996	29	16	13	4	20
1996 - 1997	40	8	5	18	7
1997 - 1998	0	0	5	3	0
1998 - 1999	30	6	16	10	6
1999 - 2000	17	-	11	11	14

The escapement numbers for wild winter steelhead in many rivers or river systems is simply a collective value for all tributaries within the system. These include the Skagit River system (comprised of the main stem Skagit and all its tributaries except the Sauk and Cascade Rivers) with escapement values ranging between 2544 - 8042, the Sauk River system (comprised of the Sauk, Suiattle, and Whitechuck Rivers) with escapement values ranging between 712 - 4740, and the Snohomish/Skykomish River system (comprised of the Snohomish, Skykomish, Sultan and Wallace Rivers) with escapement values ranging between 1843 - 4710. Again, it is significant that the effects of wild steelhead harvest is unknown for each discrete spawning population within each tributary.

Wild steelhead harvest has the potential to reduce or alter the natural genetic diversity of the species. Threats that reduce genetic diversity can be reduced by avoiding selective harvest of populations or sub-populations, maintaining the genetic integrity of discrete populations, increasing the effective population sizes, and restoring habitat. Furthermore, populations, sub-

populations, and life history variations should be studied and monitored to increase our knowledge and understanding of the existing diversity, so wild steelhead can be managed most effectively.

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The Importance of Repeat Spawners in Steelhead Populations

Most of us know that steelhead do not necessarily die after spawning, that a percentage of each run survives the rigors and stress of spawning, migrates back downstream, and again enters the ocean. These fish return the following winter and spring to their natal streams to spawn again. Steelhead can return to spawn a second, third, and even fourth time. For streams in Puget Sound and coastal Washington, the percentage of repeat spawning steelhead vary widely from year to year, ranging from < 5 percent to over 20 percent. The average yearly percentage of repeat spawners for several Puget Sound, coastal Washington, and coastal Oregon streams is presented in Table 1.

Table 1. Repeat spawning in steelhead stocks in the Pacific Northwest.

Basin	Percentage Repeat Spawner		Source
	Average	Range	
Skagit/Sauk	13.0	N/A	Curt Kraemer, WDFW
Skykomish/Snoqualmie	13.6	3.4-19.7	Curt Kraemer, WDFW
Green	6.5	0-19.4	Tom Cropp, WDFW
Quillayute	7.8	3.6-23.3	Bill Freymond, WDFW
Queets	15.4	10.9-20.4	Bill Freymond, WDFW
Hoh	10.7	7.4-17.4	Bill Freymond, WDFW
Puyallup	10	N/A	Busby et al. 1996
Nisqually	7	N/A	Busby et al. 1996
Alsea	9	N/A	Busby et al. 1996
Siuslaw	11	N/A	Busby et al. 1996
Rogue	17	N/A	Busby et al. 1996
Averages	11.0	5.1-20.0	

The largest influence on the number of repeat spawners appears to be the level of spring river flows during the outmigration after spawning; the higher the flow during the spring, the higher the percentage of repeat spawners in the following year. Most biologists think that the higher flows facilitate the downstream migration of stressed post-spawn fish (Tom Cropp, Fisheries Biologist, WDFW, personal communication).

A large proportion of repeat spawners are female, between 70 and 100 percent in most years. Females generally leave spawning areas shortly after all of their eggs have been deposited. Males stay on spawning grounds longer, spawning with multiple females and defending redds, and therefore undergo a longer period of post-spawner stress. Tom Cropp, Regional Fish Biologist for the Green/Duwamish basin, observed that virtually 100 percent of repeat spawners on the Green River are female.

Repeat spawners play an important role in maintaining the population of native fish in Washington streams. Although repeat spawners make up a relatively small percentage of the total spawning population of any given year, they contribute a proportionally larger percentage of the total egg deposition. Repeat spawning females of comparable size to first time spawners carry a larger number of eggs. Data from the Sauk River, a tributary of the Skagit, show that an average 12 lb, 3 salt, first time spawning female contains about 6,500 eggs, while a repeat spawner of similar size carries about 8,000 eggs. Larger repeat spawners in the 16 to 18 lb range can carry as many as 12,000 eggs (Curt Kraemer, Fisheries Biologist, WDFW, personal communication).

The following examples use typical data observed in Washington and Oregon's streams, illustrating the importance of repeat spawners. This example assumes a spawning run of 3,000 native steelhead in a river. In the first scenario, we use the average of 11 percent repeat spawners in any given year and in the second, we use the high range average of 20 percent repeat spawners. In both scenarios we assume that 85 percent of the repeat spawners and 50 percent of the first-time spawners are female.

Scenario 1 – 11% Repeat Spawners		
3000 Spawning Fish	Repeat Spawners	1st Time Spawners
- Ratio of Repeaters/1st Timers	330	2670
- Number of females	281	1335
- Eggs/female	8000	6500
- Potential Egg Deposition	2,248,000	8,677,500
Percentage of Egg Total Deposition	21%	79%

Scenario 2 – 20% Repeat Spawners		
3000 Spawning Fish	Repeat Spawners	1 st Time Spawners
- Ratio of Repeaters/1 st Timers	600	2400
- Number of females	510	1200
- Eggs/female	8000	6500
- Potential Egg Deposition	4,080,000	7,800,000
Percentage of Total Egg Deposition	34%	66%

As seen from the two scenarios, although comprising just 11 and 20 percent of the total steelhead population, the repeat spawners can be responsible for producing over a third of the next year class of steelhead. The total number of eggs potentially laid also increases with every repeat spawner that spawns because of the increased number of eggs that they carry. In other

words, not only are repeat spawners responsible for a higher proportion of the eggs, but with the total number of eggs as well, which may translate into larger numbers of outmigrating smolts.

The benefits of wild steelhead release fisheries are readily apparent. On average years, better than 1 in 10 native hens, and in high survival years, 1 in 5 hens that are harvested are repeat spawners. Comparing their percentage in the population with their percentage of total egg deposition, repeat spawners can collectively have almost twice the reproductive potential of their first time spawning counterparts. These are very valuable fish that can be taken out of the spawning population during catch and keep seasons, and repeat spawners cannot be readily identified by anglers. Although older, studies have shown that repeat spawners are not larger fish, nor do they show any significant size gain between spawning (Busby et al. 1996). The collection and reading of scale samples is the principle method for determining if a fish has spawned before.

The contribution of repeat spawners is one of the many buffers that steelhead populations use to cope with wide ranging variations in nature, variations that can dramatically affect year to year populations of fish. Catch and keep fisheries have a proportionally greater impact on these valuable fish because of their greater contribution to spawning fitness. Repeat spawners are also subjected to harvest for multiple seasons.

Throughout the 1990s and into the new century, native steelhead runs have been beset by poor estuarine conditions, populations lower than escapement goals, treaty netting, and continued degradation of spawning and rearing habitats. Steelhead populations in several streams

discharging to the Strait of Georgia, just north of Puget Sound, are near crisis. Disconcertingly, scientists have not been able to determine the reason for these declines, but have found evidence for both marine and freshwater induced declines (Smith and Ward 2000). Canadian scientists recommend that harvest impacts must be reduced and appropriate stock rebuilding measures implemented before these populations lose the genetic integrity to sustain themselves (Ward 2000). Given the numerous and little understood factors affecting steelhead populations, and the fact that major problems are observed just north of us, adopting a policy of state-wide release of all wild steelhead will provide a prudent and necessary buffer for sustaining Washington's steelhead populations.

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Hooking Mortality in Steelhead

Proponents of catch and keep fisheries for wild steelhead offer the notion that steelhead caught and released by anglers die or do not spawn successfully, and that the percentage of fish succumbing to the stress of hook and line capture is unacceptably high. Published or available hooking mortality data sets that relate specifically to steelhead or salmon in freshwater are scarce (Mongillo 1984; Muoneke and Childress 1994). Consequently, catch and keep proponents have invariably applied hooking mortality studies of other species, usually resident salmonids, to anadromous steelhead in rivers.

British Columbia Steelhead Brood Stock Program Data

The British Columbia Ministry of the Environment, Lands, and Parks produced a multi-year study of summer and winter-run steelhead hooking mortality (Hooton, 1987, Hooton 2001). Seven years of hooking mortality data were published between 1981 and 1987 on Vancouver Island streams. During this period, over 4,000 steelhead were caught on conventional gear (bait, barbed hooks), most to provide brood stock for hatchery programs. Of these angled steelhead, 144 mortalities occurred, representing a study-wide average of 3.6 percent hooking mortality (Table 1).

Table 1. Stock specific hooking mortality among winter-run steelhead on Vancouver Island, 1981-1987.

Basin	Years of Record	Number of Steelhead Angled	Hooking Mortality	Hooking Mortality percentage
Cowichan	7	509	16	3.1
Englishman	5	240	9	3.8
Heber	1	70	3	4.3
Gold	1	30	0	0
Nanaimo	7	378	7	1.9
Puntledge	7	481	9	1.9
Salmon	6	464	27	5.8
San Juan	2	49	3	6.1
Somass	7	1,174	43	3.7
Tsitika	7	320	10	3.1
Keogh	2	336	17	5.1
Total		4051	144	3.6

Source: Hooton 1987.

Hooking mortality of winter-run steelhead was studied more rigorously on the Keogh River on Vancouver Island in 1985 and 1986 (Table 2). Among 336 steelhead angled on various combinations of terminal gear, a total hooking mortality of 17 fish, or 5.1 percent occurred. Use of natural bait produced higher mortality (mean = 5.6 percent) than did artificial lures (mean = 3.8 percent). Mortality while using barbed hooks was higher (mean = 7.3 percent) than for barbless hooks (mean = 2.9 percent) regardless of whether bait or artificial lure was employed. Examination of all combinations appear to indicate that barbed hooks were the largest contributor to mortality.

Table 2. Percent hooking mortality (number of fish in parentheses) on various terminal gear types in the Keogh River in 1985 and 1986.

Year	Gear Type				Total Mortality
	Barbed/Bait	Barbed/No Bait	Barbless/Bait	Barbless/No Bait	
1985	12.5 (6)	7.7 (2)	3.6 (2)	0 (0)	7.7 (10)
1986	5.9 (3)	2.5(1)	2.6 (2)	2.6 (1)	3.4 (7)
Total Mortality	9.1 (9)	4.5 (3)	3.0 (4)	2.6(1)	5.1 (17)

Source: Hooton 1987.

A study evaluating the degree of injury of winter steelhead was also undertaken on the Keogh River (Table 3). Fish were caught with hook and line just downstream of a weir located in the lower river. The degree of injury was observed, followed by tagging and immediate release upstream of the weir. Later, after the spawning season, out-migrating kelts were trapped at the weir to determine post-spawn survival of angled and non-angled fish. Of the 336 steelhead originally caught by hook and line, 84 were later recovered in post-spawn condition at the weir, representing 27.5 percent of fish that had recovered enough to migrate back down to the lower river. Post-spawn recovery of non-angled fish was 32.9 percent, a difference of 5.4 percent. These data indicate that the majority of caught and released fish not only made it to spawning grounds, but spawned and out-migrated.

Table 3. Number of hooked fish (percentage in parentheses) and non-angled fish later recovered as out-migrating post-spawners in the Keogh River in 1985 and 1986.

Year	Hooked Fish Recovered as Kelts	Non-Angled Fish Recovered as Kelts
1985	25 (22.3%)	56 (24.0%)
1986	59 (30.6%)	403 (34.7%)
Totals	84 (27.5%)	459 (32.9%)

Source: Hooton 1987.

Interestingly, Hooton (2001) provided a cautionary note to his earlier study, reporting that hooking mortality was measured as mortality occurring in the first 24 hours after capture. Mortality observed after 24 hours was considered holding mortality related to the holding and transport of fish in artificial environments for brood stock programs. Unfortunately, holding mortality was not recorded during the brood stock program and could not be evaluated. However, the above kelt recovery data on the Keogh River provide evidence that delayed mortality resulting from angling injury is minimal.

Comparison of the degree of hooking injury with mortality rates revealed, not unexpectedly, that mortality was highest among fish that sustained severe blood loss when the hook pierced or tore a major blood vessel (Table 4). In these cases, 53.3 percent hooking mortality occurred. An instructive feature of these data was that despite extensive blood loss, 47 percent of the most severely injured fish recovered and were released in what appeared to be a healthy condition. While the number of fish in the most severe injury groups was small, their recovery as post-spawners did not differ substantially from the least injured fish.

Table 4. Number (percentage in parentheses) of hooking mortalities among steelhead of various hook injury categories and the percent of individuals of each category recovered as out-migrating post-spawners in the Keogh River.

Hook Injury*	Fish Landed	Hooking Mortality	Number Post-Spawners Recovered
1	257	0 (0%)	51 (20.6%)
2	49	1 (2.0%)	7 (15.9%)
3	30	16 (53.3%)	4 (28.6%)
All	336	17 (5.1)	84 (27.5%)

* 1=Superficial wound, no blood loss.

2=Moderate wound, some blood loss but no major blood vessel ruptured.

3=Severe blood loss associated with rupture of major blood vessel.

Source: Hooton 1987.

Other Steelhead Data

As reported, other than the British Columbia steelhead brood stock program, hooking mortality data for steelhead are scarce. However, several other hooking mortality data sets were identified in which steelhead were captured for study or brood stock collection (Table 5).

Table 5. Other hooking mortality data sets for steelhead.

Study	Hooking Mortality (%)	Comments
MELP ¹ , Kamloops	1.61	436 steelhead collected from the Thompson R. for brood stock between 1982-1995
MELP ¹ , Surry	0.31	306 steelhead collected from the Coquihalla R. for brood stock between 1985-1995
MELP ¹ , Surry	4.31	209 steelhead collected from the Squamish R. for brood stock between 1985-1995
Lirette, 1988	7.9	76 summer steelhead collected from the Somass River R. for brood stock in 1984 and 1985
Lirette, 1988	4.1	195 winter steelhead collected from the Somass R. for brood stock in 1984 and 1985
Lirette, 1989	8.7	69 summer steelhead collected from the Campbell R. for brood stock in 1988 and 1989
Thomas, 1995	4.6	21 steelhead collected from the Skeena R. Terminal gear not specified
Nelson et al. 2001	0.9	226 steelhead were angled and tracked in a radio tracking study in 1999 and 2000.

¹ Ministry of the Environment, Lands, and Parks, British Columbia (unpublished data).

Average hooking mortality for Table 5 is 3.54 percent, which is within the general range of that found for the British Columbia steelhead brood stock program.

Other Hooking Mortality Data

In contrast to the relative scarcity of mortality data in freshwater anadromous fisheries, there is an abundance of data on resident salmonids, for which a consistent pattern is apparent. Specifically, resident fish caught on bait experienced significantly higher mortality compared to anadromous fish in rivers. This result is confirmed repeatedly in numerous review papers (Table 6). Studies also show that hooking mortality of resident salmonids with bait is consistently three to nine times higher than mortality associated with artificial lures or flies. The typical observation was that baited hooks were taken deeply and that rupture of blood vessels was the primary cause of mortality (Hooton 2001). Most studies with resident fish indicate hooking mortalities between 25 and 50 percent, as shown in Table 6.

Table 6. Hooking Mortality in Resident Trout.

Species	Hooking Mortality (%)	Study
Multiple Species	25	Wydoski 1977
Atlantic salmon (landlocked)	35	Warner and Johnson 1978
Rainbow trout	~30	Mongillo 1984
Cutthroat trout	~50	Mongillo 1984
Several resident trout species	43.6	Taylor and White 1992
Several resident trout species	31.4	Trotter 1995

It is clear that hooking mortality data from resident salmonids are not applicable to non-feeding steelhead in rivers. Equally clear is that the hatchery steelhead programs in southwestern British Columbia provide evidence that angled steelhead have a high survival after capture by angling.

Conclusions

Overall, the data indicate that wild steelhead release fisheries on winter steelhead stocks exert a minimal influence on the ability of the fish to spawn and refute claims that caught and released steelhead were effectively lost from the population. The following conclusions can be drawn:

- Hooking mortality of steelhead ranged between 0 and 6 percent in 11 Canadian river basins over a 7 year period with a Province-wide average of 3.6 percent.
- Hooking mortality of winter-run steelhead averages between 2 and 3 percent using barbless hooks, regardless of whether bait is used.
- Barbed hooks appear to be the largest contributor to hooking mortality.
- The great majority of released fish make it to spawning grounds and spawn.
- Use of resident salmonid hooking mortality data is not applicable to steelhead in freshwater.

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Wild Steelhead Release Experiences Outside of Washington State

Region-wide wild steelhead release fisheries have been a common tool used by management agencies to protect dwindling stocks of wild steelhead in a number of jurisdictions including British Columbia, Idaho, and Oregon. These programs have been successful in maintaining, or in most cases, reversing the declining trend of wild steelhead populations throughout the range of the jurisdiction. Although these programs eliminate the take of wild steelhead, wild steelhead release regulations, coupled with hatchery supplementation, have actually increased both angler numbers and angler satisfaction in areas where they have been implemented. This chapter summarizes the wild steelhead release experiences documented in British Columbia and Idaho, relying on the findings of published papers prepared by agency fisheries biologists.

British Columbia

Hooton (1987) provided an analysis of the wild steelhead release experience on Vancouver Island, an area that contains about 35 percent of the total number of streams that sustain measurable angler effort in British Columbia. Wild steelhead release regulations for wild steelhead in all of British Columbia were phased in between 1980 and 1984, prompted by dramatic declines in steelhead populations and catch. Fishery investigations conducted in the 1970s revealed the necessity for major reductions in daily and season catch limits. Prior to 1980, regulations governing wild steelhead harvest were uniformly liberal across all of British Columbia as illustrated in Table 1.

Table 1. Historical steelhead harvest policies in British Columbia.

Year	Steelhead Harvest Quota			
	Per Day	Per Month	Per Year	Per River
Pre- 1959	3			
1959-1961	3		40	
1962-1976	2		40	
1977-1979	2		20	10
1980-1984*	1	2	5	
1985-Present	0	0	0	

* Further restriction included wild steelhead release Dec. 1 – Mar. 1.

Under these regulations, the number of wild steelhead retained by Vancouver Island anglers displayed a declining trend for more than a decade prior to any wild steelhead release restrictions, from about 19,000 fish in 1968 to less than 6,000 fish in 1979, as illustrated by Figure 1. Also illustrated by Figure 1 is the growing catch of hatchery steelhead from hatchery programs beginning in earnest by 1980.

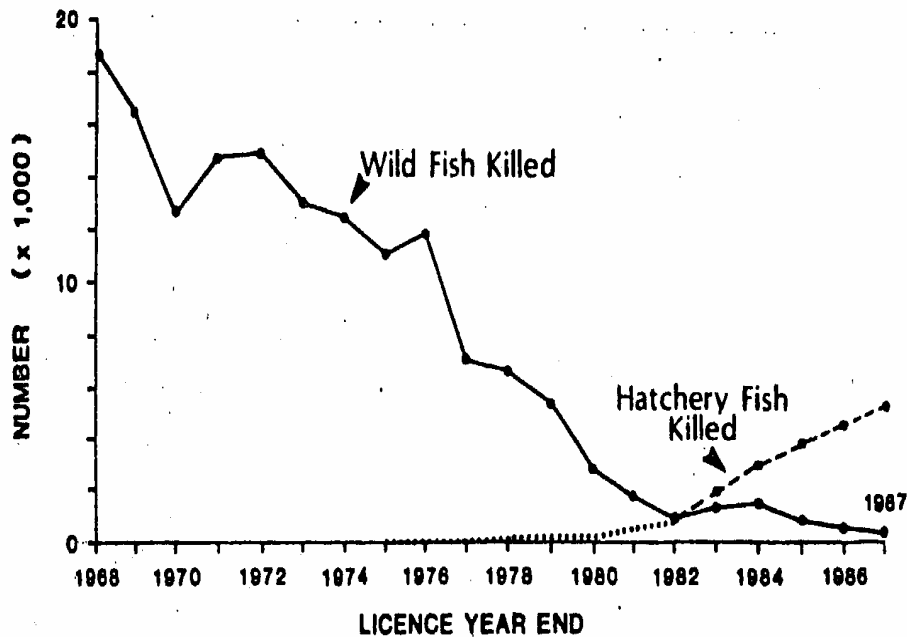


Figure 1. Number of wild and hatchery steelhead killed by anglers on Vancouver Island streams. Some wild kill reported after 1984 probably resulted from errors in catch reporting, misidentification of hatchery fish and/or deliberate non-compliance. Source: Hooton 1987.

Steelhead Population Response to Wild Steelhead Release

The response to the implementation of wild steelhead release regulations in 1980 was immediate. In the years 1980 to 1984, the seasonal wild steelhead release regulations reduced the wild steelhead kill to approximately one third of the preceding three-year average. This was followed by a further decline after 1985 when year round wild steelhead release came into effect (Figure 1). Figure 2 shows that the total catch of wild steelhead increased sharply during the wild steelhead release period and remained well above previous peaks. Tagging studies conducted during this period revealed that a substantial portion (>30 percent) of the increase could be attributed to repeat captures. Fisheries biologists in British Columbia believe that wild steelhead recruitment (abundance and catch) would continue to fluctuate annually in response to

changing environmental conditions but at a substantially higher level than would have occurred in the absence of wild steelhead release regulations.

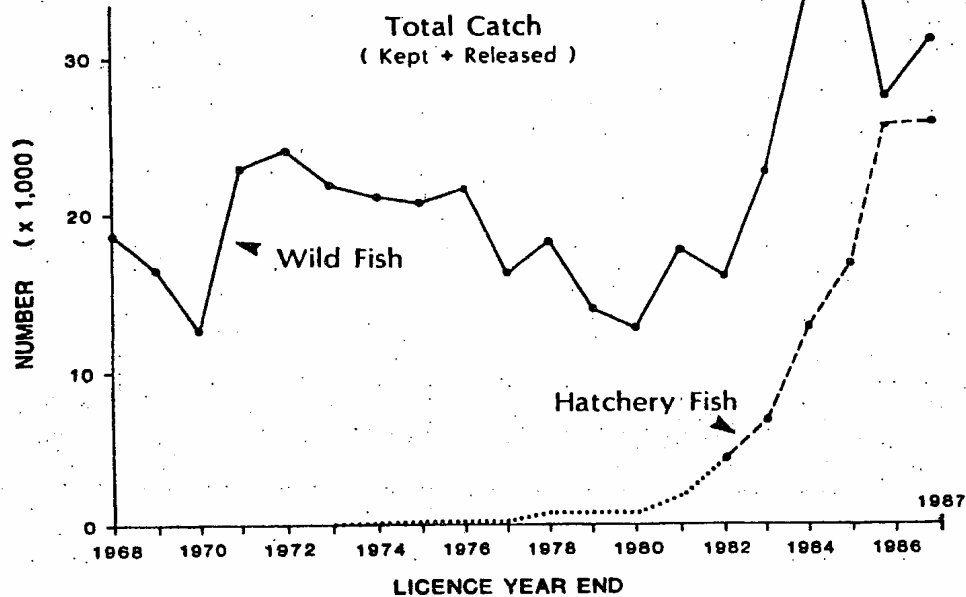


Figure 2. Total angler catch (kill and release) of wild and hatchery steelhead on Vancouver Island streams. Source: Hooton 1987.

Response of Anglers to Wild Steelhead Release

An evaluation of angler response to the implementation of wild steelhead release regulations and hatchery supplementation indicate that long-term losses in fishery opportunities were negligible in Vancouver Island steelhead fisheries. On the short-term, the immediate response of anglers to wild steelhead release, first imposed in 1980, was a 50 percent reduction in days fished. A similar decline occurred in 1981 and 1982, after which a strong upward trend

developed. By 1985, the pre-wild steelhead release angler day total was surpassed and angling effort increased from average of 10 days per licensee to 12 days, as illustrated in Figure 3.

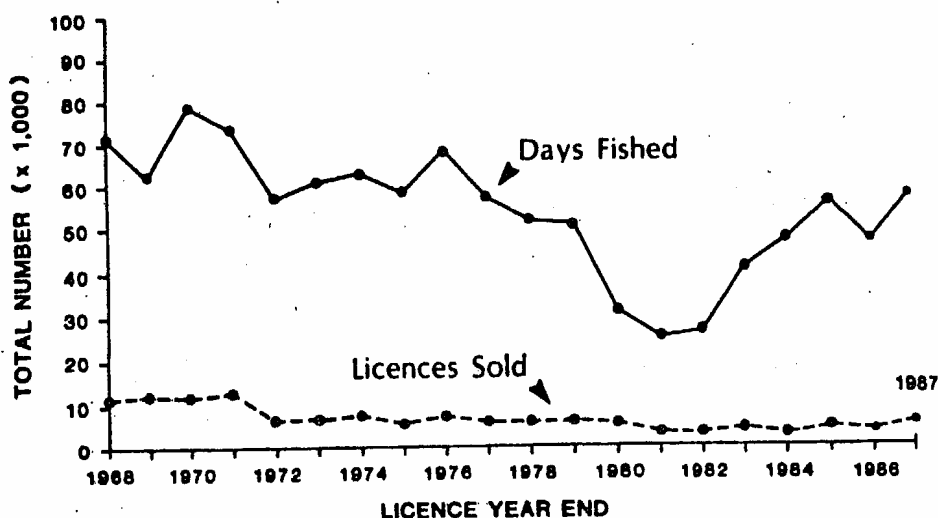


Figure 3. Number of days fished and steelhead angling licenses sold.
Source: Hooton 1987.

License sales and days fished over the 1983 to 1987 period were undoubtedly influenced by the rapid growth of the hatchery steelhead program. The extent of this influence as opposed to a growing acceptance of wild steelhead release is unknown, but evidence points to the availability of hatchery steelhead as a dominant factor. There is also evidence that the implementation of wild steelhead release and hatchery supplementation in concert has acted to spread out angling effort creating catch and keep (hatchery fish) opportunities on hatchery supplemented streams and creating enhanced wild steelhead release experiences on other streams.

In four popular steelhead streams where anglers had the option of fishing for both hatchery and wild steelhead, the number of angler days and the percent of the total Vancouver Island steelhead angler days increased steadily through the pre and post 1980 period as the supply of hatchery steelhead increased to target levels, as illustrated in Figure 4. This figure shows a decrease in angler effort in the early 1970s, probably due to declining catches of wild steelhead caused by declining wild populations. With the advent of hatchery supplementation in the late-1970s, the amount of angler effort increased dramatically.

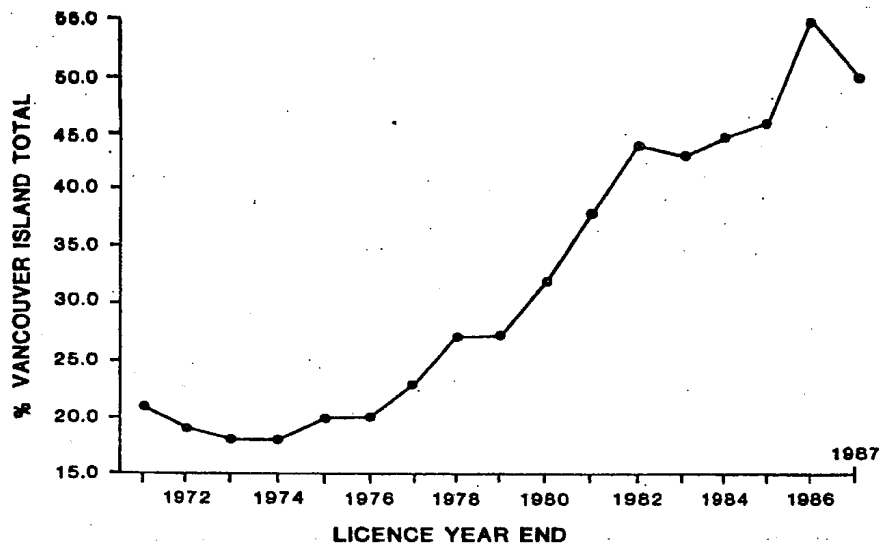


Figure 4. Percent of total Vancouver Island steelhead angler days expended on four popular hatchery steelhead streams. Source: Hooton 1987.

A contrasting pattern was observed on the Gold River, the most prolific wild-only steelhead stream in the region, as illustrated in Figure 5. This stream saw a similar decline in angling effort and catch through the 1970s with declining wild steelhead populations. With the implementation of wild steelhead release in 1980, both the number of angler days and catch of

wild steelhead increased well above the levels experienced when populations were severely depressed during the late-1970s.

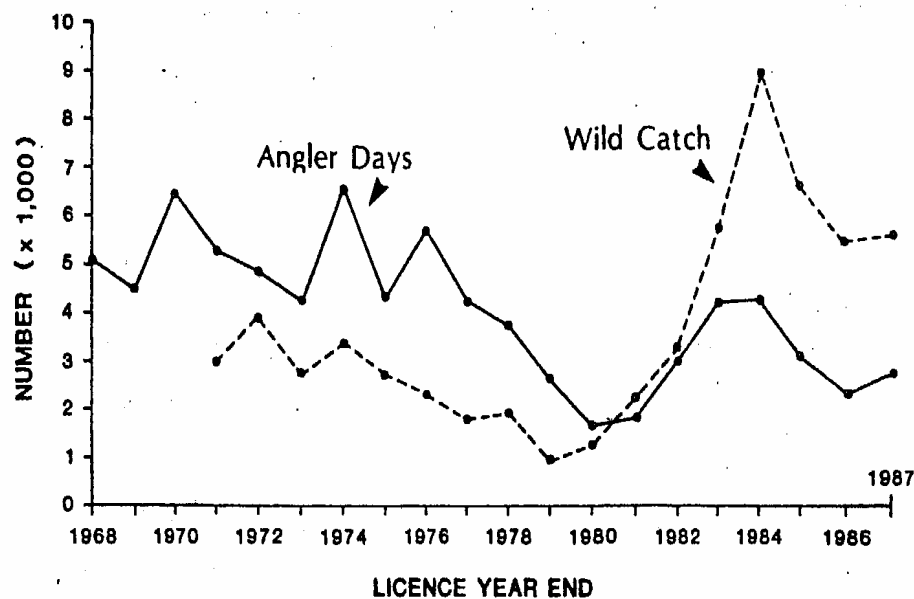


Figure 5. Number of steelhead angler days and total wild steelhead catch – Gold River.
Source: Hooton 1987.

Interestingly, although the wild catch rebounded to levels well above historical pre-wild steelhead release numbers, the amount of angler effort leveled off to an amount somewhat below historical levels. In other words, fewer anglers were fishing the wild steelhead release only stream and catching more fish per unit of effort, thus enhancing the total fishing experience. However, fewer anglers on the Gold River did not translate to lower fishing effort region-wide because of the shift to hatchery supplemented streams where anglers have catch and keep opportunities (Figure 4).

The evaluation of wild steelhead release regulations on Vancouver Island reached the following positive conclusions for both wild steelhead populations and angler effort:

- Wild steelhead release is an effective mechanism for maintaining angling opportunity without negatively impacting stock recruitment.

- A significant proportion of the angling public may not participate in purely wild steelhead release fisheries signifying a need to augment the regulation with hatchery supplementation.

Wild steelhead release regulations with hatchery supplementation results in no decreases in total fishing effort.

- Blanket wild steelhead release restrictions are not necessary on some relatively healthy or remote wild steelhead streams on Vancouver Island; however, relaxation of existing regulations on a small number of streams would concentrate anglers and increase harvest beyond tolerable limits, thus recreating the circumstances which demanded wild steelhead release initially.

- Wild steelhead release management of wild steelhead stocks becomes an increasing biological necessity in British Columbia as competing user groups strengthen their claims to the resource, as the stream habitat base is eroded by the inexorable forces of population growth, resource development, increases in angler efficiency, and as lobby pressures demand.

Idaho

Thurrow (1987) provided an analysis of the wild steelhead release experience in the State of Idaho using data collected from the South Fork Salmon River. Similar to the Canadian experience, Idaho implemented a regulation requiring the release of wild steelhead and allowing the harvest of hatchery fish in 1982. Since 1982, Idaho anglers have caught and released record numbers of wild steelhead and the harvest of wild stocks has diminished to near zero. Public acceptance of the wild steelhead release regulations has been widespread and the regulations are assisting in the restoration of wild stocks.

The construction of dams within Idaho has eliminated nearly 3,000 miles of steelhead trout habitat by creating migratory barriers on the Boise, North Fork Clearwater, Payette, Upper Snake, and Weiser Rivers. Human-caused activities such as livestock management, mining and timber industries, development, and wild steelhead harvest have further degraded these populations and their habitats. As a result of these factors, only three major drainages and a small number of mainstem Salmon River tributaries sustain wild steelhead. In recognition of the uniqueness and value to future management, the Idaho Department of Fish and Game adopted a policy protecting wild steelhead populations.

Pre-Wild Steelhead Release Management

As early as 1968, the wild steelhead population in the South Fork Salmon River had declined from 3,000 or more to a few hundred fish and the entire stream was closed to steelhead angling. In 1974, the wild steelhead fishery on the Middle Fork Salmon River was closed as the population diminished from nearly 10,000 to less than 500. However, a catch and keep fishery

remained on the mainstem Salmon River. By the fall of 1975, the steelhead run in the entire Salmon River basin had diminished to critical levels and for the first time in history, the entire basin was closed to catch and keep angling.

Between 1976 and 1981 a myriad of management techniques were employed to allow harvest of hatchery fish while curtailing harvest of wild fish such as maximum size limits, differential daily and seasonal bag limits, barbless hooks, closures of river segments where wild fish predominated, and voluntary release of wild fish. These management efforts were largely ineffective in lowering the catch rate of wild steelhead. Many of the wild stocks had behavioral attributes that made them vulnerable to harvest such as stocks overwintering in the mainstem Salmon or Snake Rivers, wandering upstream of natal streams, or staging near the mouths of natal streams during the spring. As a result, exploitation rates on wild stocks approached or exceeded 50 percent in the early 1980s.

It became apparent that an innovative regulation was needed to adequately protect wild stocks. Closed seasons and catch and release regulations were undesirable due to the need to allow harvest of hatchery stocks. Attempts at voluntary release programs failed, as nearly 80 percent of anglers continued to kill wild fish. In the fall of 1982, the state adopted a regulation requiring the mandatory release of wild steelhead and allowed the harvest of hatchery fish. Identification of hatchery fish was first conducted using dorsal fin measurements and later by adipose fin removal.

Steelhead Population and Angler Response to Wild Steelhead Release

As with the Canadian experience, the response of the wild steelhead population to wild steelhead release regulations in 1982 was immediate as illustrated in Figure 6. The percentage of wild steelhead harvested declined to near zero. Concurrently, the total steelhead harvest of hatchery fish increased steadily to record levels (<27,000 fish) by 1986. Anglers also caught and released record numbers of wild steelhead. Within Sections 4 and 5 of the Salmon River basin, there was a relatively steady increase in numbers of fish released from less than 1,000 fish in 1975 to over 5,000 fish in 1986, as illustrated in Figure 7. In 1986, over 30,000 fish were caught and released in the Salmon River alone.

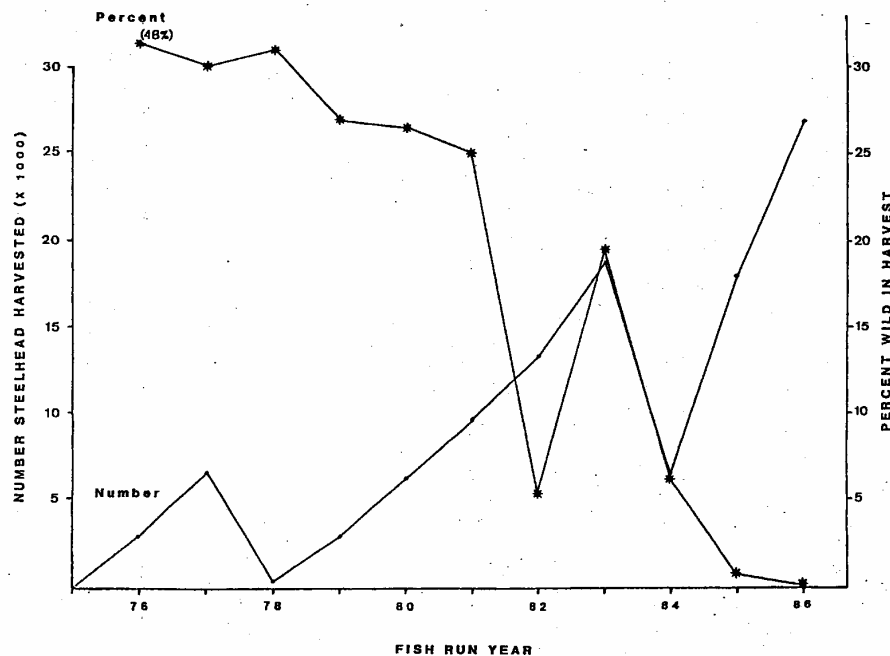


Figure 6. Number of steelhead harvested and the percentage of wild steelhead in the total harvest, Salmon River basin. Source: Thurow 1987.

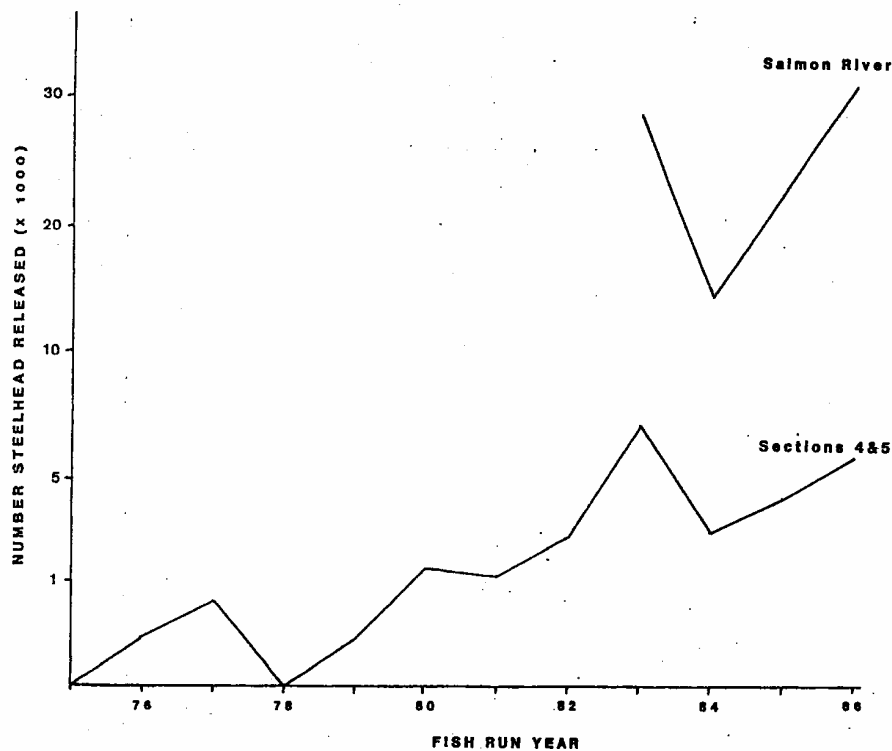


Figure 7. Number of steelhead released in the Salmon River. Source: Thurow 1987.

Thurow (1987) reported that unlike the Canadian experience, public acceptance of the wild steelhead release regulation met with widespread support. Anglers were knowledgeable about the regulation and supportive. A review of Idaho angler attitudes found that most anglers fished for sport and to enjoy the outdoors. Only 12 percent listed “getting fish for food” as their primary reason for fishing. Most anglers (69 percent) also placed emphasis on the protection and enhancement of wild trout populations.

Applying Wild Steelhead Release in Washington State

The wild steelhead release experiences observed in British Columbia and Idaho have wide relevance to the present situation in the State of Washington and much can be learned.

First, the pre-wild steelhead release periods in both regions were characterized by periods of declining runs such that periodic closures were necessary before region-wide wild steelhead release regulations were promulgated. This is the present case in Washington. Wild steelhead fisheries in Washington have been characterized by chronically low returns and periodic closures over the past several years. This symptom has been region-wide ranging from the Puget Sound basin, Olympic Peninsula to the upper Columbia basin in eastern Washington. The latest observations by regional WDFW biologists suggest that the seasonal wild steelhead release fisheries in Puget Sound streams will not occur for several years because predicted small runs will not withstand the very small take associated with hooking mortality.

A great deal can be learned from the conclusions presented at the end of the British Columbian experience. The second conclusion states that a significant proportion of the angling public may not participate in purely wild steelhead release fisheries unless augmented by hatchery fisheries. A similar attitude may be expected with Washington anglers, but it is unlikely that promulgation of a state-wide wild steelhead release policy will result in the short-term dip in license sales and angler effort as experienced in BC. Attitudes in Washington have been shaped by wild steelhead release policies in BC, Idaho, Oregon, and even in Washington for native summer-run and selective fishery regulations. Such an acclimation was not available for the Canadian steelhead fisheries. Perhaps more importantly, established hatchery programs are present in most watersheds that carry significant steelhead fisheries, allowing anglers ready access to catch and keep fisheries. In fact, in recent years marked hatchery fish have produced over 80 percent of Washington's total steelhead harvests. The Canadian experience strongly suggests that the access to catch and keep opportunities keeps angler efforts high.

The third conclusion of the British Columbian experience states that wild steelhead release restrictions are not always necessary on some relatively healthy or remote wild steelhead streams; however, allowing harvest on a small number of streams could concentrate anglers and increase harvest beyond tolerable limits. Similar experiences have been observed in Washington. Fishery closures on coastal and Puget Sound streams because wild (or hatchery) escapement has not been met, and subsequent increases in angling pressure on a few streams where larger runs exist is an oft-cited experience in Washington fisheries. The Canadians recognized the potential downward management spiral that could occur if restrictions were relaxed, and refused to employ crisis management as the primary tool of providing fishing opportunities while trying to sustain runs at healthy levels.

Finally, British Columbia and Idaho considered wild steelhead release steelhead fisheries as a biological necessity in the early 1980s, but have far smaller populations of both residents and licensed anglers, lower levels of development, and lower encroachment in the riparian zone than in Washington streams. Yet, Washington allows the take of wild steelhead. It appears logical that with our level of population growth and development, the sustainability of wild steelhead runs and their habitats will continue to be strained and continue to decline without changes in present management policies. The need for change should not necessarily be taken as a failure of present management efforts, but a positive response to the increasing use and stresses of Washington's natural resources.

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Wild Steelhead Release Economics

Introduction

Around the world, catch and release management of many sport fisheries has proven to be a valuable and successful tool in enhancing certain sport fisheries in the face of ever-increasing demand and angler effort. As our population grows and available fish habitat shrinks, we can no longer afford the luxury of abundant consumptive recreation on many of our stressed fish populations. Natural resource managers need to shift some of the increased demand to non-consumptive uses of fish.

With catch and release management, many fisheries can recover or improve biologically while providing increased recreational opportunities and economic benefits to local communities. More anglers will be able to fish more often, and with stable or increasing fish populations, the angling experience for many will become more valuable. This is the very essence of the economic argument for wild steelhead release. Hatchery steelhead can fill the need for harvest opportunities for both local and non-resident anglers (over eighty percent of the steelhead harvest in Washington is comprised of hatchery-origin fish), however, wild steelhead are far too valuable to be caught only once. Populations of wild steelhead in Washington State will bring the most long-term economic value if managed under a wild steelhead release approach. Evidence from other fisheries in North America and around the world supports this position. Furthermore, the risk of increased federal regulations on imperiled fish populations can

be reduced through wild steelhead release management. This means significant costs will be avoided as well as negative economic impacts that may come from such federal rules.

Economic Concerns and Impacts

There are several economic concerns regarding total release of wild steelhead:

- 1) Impact on license sales that effects the budgets of management agencies.
- 2) Economic impact to the state as a whole and to local communities.

On the first concern, in the short term, there is a chance that wild steelhead release will negatively impact license sales to a small segment of the angling public. But that is doubtful, as most anglers fish for multiple species and they will still have the opportunity to harvest hatchery steelhead. It is unlikely that anglers fish for and harvest only wild steelhead, and if theses anglers do exist they are likely a small fraction of the angling public. Therefore, it is unlikely that there will be a drop in license sales. Furthermore, more than 80 % of steelhead harvested in Washington are hatchery steelhead (T. Roelofs, WDFW Steelhead Symposium, Seattle, 22 Sept 01), indicating that harvest opportunities will still remain. Over the longer term, more people will have more opportunities to fish, as more steelhead fisheries can stay open for longer periods. More licenses will likely be sold for this increased opportunity. Studies from Vancouver Island, BC supports this viewpoint (see Starkes, this volume).

The second concern, economic impact to local communities and the state, is of greater importance. The opportunity to catch and release wild steelhead is a big draw for many destination anglers. There will be more opportunities to catch wild steelhead. A released fish

can be caught more than once and still go on to spawn successfully, and these opportunities will increase in value. Case studies and examples from other fisheries presented later in this chapter support these hypotheses and demonstrate the economic benefits of wild steelhead release.

While it is hard to quantify, Washington State is most likely losing revenue to other neighboring states that are destinations for out-of-state anglers and even resident anglers. British Columbia, Oregon, Montana and Idaho all attract many non-resident anglers, most of whom are primarily interested in high quality fishing experiences that involve having the opportunity to catch more and/or bigger fish than they can find in home waters. They may harvest some fish, but generally harvest is a secondary concern. These travelling anglers buy the most expensive licenses (out of state) and typically generate the greatest economic impact per angler day as they may purchase more lodging, transportation, guides, equipment and supplies.

Washington appears to be lagging behind our neighbors in generating economic opportunities from statewide wild steelhead release regulations. The question that begs to be asked is, why does Washington not capitalize on the economic potential that can be generated from a statewide wild steelhead release policy? Smaller, rural communities would likely gain the greatest economic benefit from this management policy. “The WDFW’s continual practice of ‘maximum yield’ is a major reason we can’t retain quality fishing in our state” (Mitchell and Brazda 2001).

The following is a list of businesses that benefit from healthy recreational fisheries:

- A. Guide Services
- B. Lodges, Hotels, Motels, Bed and Breakfasts
- C. Restaurants and coffee shops
- D. Retailers: Sporting Goods, tackle/fly shops, grocery stores, gas stations
- E. Boat Sales: Jet boats, drift boats and inflatable craft
- F. Transportation: Truck and SUV purchases, rental cars, airline flights
- G. Taxidermy: Great reproduction mounts can be made from a picture and measurements without harvesting the fish.

In Washington State, there was an abundance of negative economic impacts associated with the year 2000 emergency closures of the wild steelhead release fishery for steelhead in the North Puget Sound rivers. Many of the above listed businesses from Seattle to Bellingham (and particularly some of the smaller towns in between) were hit hard economically by closures of world famous steelhead streams in the North Puget Sound. Years of over-fishing, including wild steelhead sport harvest, justified by an aggressive “maximum sustainable harvest” (MSH) management strategy, helped cause this dire situation. Habitat degradation and ocean conditions certainly played a large part in damaging these runs, but over-harvest has played a role as well. While habitat and ocean conditions are more difficult to manage and predict, wild steelhead release management of wild steelhead can help avoid economically devastating closures.

Washington’s apparent management objective is to harvest the most steelhead possible while trying to conserve wild stocks. Given that the MSH management approach is fraught with

risks, difficult to implement and has demonstrated limited success, this approach seems to be too risky. According to the World Resources Institute (WRI, 1999), over 70% of commercial fisheries stocks for which data exists are either over-fished or depleted. These stocks are managed primarily with MSH/MSY approaches, which illustrates the apparent flaws of that management approach.

Evidence from Geographic regions

British Columbia

The Skeena River system is famous for its large runs of steelhead, and many people from Canada, the U.S. and the rest of the world routinely make the long trip for this catch and release, wild steelhead fishery. Bob Hooton, B.C. Ministry of Fisheries, estimates that this fishery is worth approximately \$1.9 million dollars per year, assuming anglers spend \$50 per day (WDFW Steelhead Symposium, Seattle, 22 Sept 01). Moreover, this revenue is generated between August - November. When considering non-resident anglers, \$50 per angler day appears to be a low value. According to Jim Van Loan of the Steamboat Inn in Oregon (personal communication, 4 Sept 01), the cost for the Steelhead Valhalla Lodge on the Sustut river is \$3550 per person per week during an eight week season. This does not include the cost of travel to a relatively remote location. He also reports that “virtually all of the B.C. operations are now catch and release.”

If the Skeena system steelhead fishery is worth \$1.9 million per year in perpetuity, a net present value of that fishery is \$38 million using a 5% discount rate, net of inflation. Using some different but reasonable assumptions, this fishery could be valued at a significantly higher

amount. Given that there are 38,000 angler days inherent in the \$1.9 million per year figure and assuming that 30% of anglers are non-residents of BC, the value and amount spent by non-resident anglers is significantly higher than \$50/day. It is not a stretch to say that they might spend more than \$500/day when including travel, lodges, guides, food, equipment, drinks, licenses and opportunity cost of their time. Using \$500/day for non-residents for 30% of the total angler days and \$50/day for residents and the remainder of the angler days, the yearly economic impact becomes \$7.0 million/year. Convert that into a net present value of the future years at 5% discount rate, and the Skeena steelhead fishery worth becomes \$140 million. It is apparent that the Skeena system is a valuable resource with healthy populations of wild steelhead in part because of wild steelhead release management. This provides significant direct and indirect economic benefits at both the state and local level.

Idaho

In a recent study by economist Don Reading (Reading 1996), recreational steelhead fishing in the 1992/93 season in Idaho was responsible for over \$90 million in expenditures and nearly 2,700 jobs. This value, when adjusted for an inflation rate at 2% per year would be worth \$105 million in 2001. Reading believes his models were conservative enough to say that, "It is reasonable to expect that the impacts generated by the models are somewhat less than actual impacts." It is important to note that Idaho has steelhead fishing on only three rivers (Snake, Clearwater and Salmon) and only for a small portion of the year. Washington State on the other hand has dozens of steelhead rivers and many opportunities to pursue steelhead year-round. Idaho allows harvest of hatchery steelhead but all wild steelhead must be released. Wild steelhead release does not appear to have negatively impacted steelhead angling in Idaho (see

Starkes, this volume). In fact, without a successful wild steelhead release program, the fishery could have been closed or otherwise negatively impacted by federal rules protecting wild steelhead listed under the Endangered Species Act.

Idaho also enjoys tremendous economic benefits from its resident trout fisheries where many areas are either catch and release or have strongly restricted catch limits. In one example, the South Fork of the Snake has become more valuable because of catch restrictions (Thornberry 2000). According to Idaho Department of Fish and Game fisheries manager Virgil Moore, “Once an angler sees an improvement in fishing, they buy into the regulation. They switch from a consumptive fishery based on the number of fish they catch to a fishing experience based on having a good time.” In comparing a 1982 creel survey to a 1996 survey, angling pressure quadrupled while the amount of fish harvested decreased by an amazing 83%. Thornberry goes on to say, “The regulation also changed attitudes about the river. Happy with bigger and more plentiful trout, anglers quit killing fish.” A similar situation could follow in Washington assuming it implements wild steelhead release rules.

Oregon

In Oregon, it is easy to see the economic value of the steelhead fishery on famous rivers such as the Deschutes, Sandy, Umpqua and Rogue. These rivers are destination fishing locations for anglers from around Oregon and from around the country. Given the number of rivers, towns, shops and lodges associated with fishing for steelhead, it should be at least as large if not significantly larger than the \$90 million per year value derived by Idaho (See Idaho section, Reading, 1996).

According to Mark Chilcote of the ODFW (WDFW Steelhead Symposium, 22 Sept 01), Oregon manages its wild steelhead primarily for wild steelhead release angling opportunities. This is done to meet their management objective for wild steelhead: to maximize the number of sustainable spawners. This will best insure that Oregon will have a viable steelhead fishery well into the future, and it best maximizes the economic value of wild steelhead in that state.

California

Perhaps more so than in its neighboring states in the Northwest, steelhead angling in California, while still popular on several rivers, is a mere ghost of what it once was. According to Terry Roelofs of Humboldt State University, (WDFW Steelhead Symposium, 22 Sept 01), the only fishing of r wild steelhead in California is wild steelhead release. Despite this policy, recreational fishing for wild steelhead remains an important economic engine in the few regions having rivers that still support fishable wild steelhead populations.

Montana

Rivers like the Bitterroot, Yellowstone, Big Hole, Big Horn, Madison and Gallatin are blue ribbon trout fisheries that feature primarily catch and release angling and are a tremendous economic resource to local communities. Chambers of Commerce in towns like Ennis and West Yellowstone strongly endorse catch and release management (see www.ennischamber.com and www.westyellowstone.com). While mostly in Wyoming, Yellowstone National Park has gone to catch and release angling for native trout. “Populations rebounded in the park after the advent of catch-and-release-only fishing rules in the 1970’s” (Yellowstone National Park Press Release

2001). Angler effort and satisfaction continues to increase with increasing trout populations. Without the implementation of catch and release regulations, the park would not be able to cope with this much angling pressure. Less angling effort translates into reduced economic benefit.

Wyoming

A recent study on the value of improved trout fishing on Wyoming streams (Dalton et al. 1998) demonstrated that anglers were willing to pay considerably more for the chance to angle for more and bigger fish than are available to them currently. The net willingness to pay, or consumer surplus, was \$101/day for the increased trout populations and \$132/day for doubling the chance of catching a large fish. These numbers increased to \$131/day and \$227/day respectively for the non-resident and tourist angler. The consumer surplus values were in addition to the actual expenses for the fishing trip. In terms of actual expenses, tourist anglers spent considerably more per day on fishing compared to resident anglers: \$275/day for travel, room and board, and licenses compared to \$37/day for these items for the resident angler. These figures do not account for the opportunity cost of that person's time nor for the cost of the equipment used, which would increase these expense amounts.

It is important to recognize that a product of fish and wildlife management agencies is the opportunity for the public to use and enjoy wildlife as well as conserving the wildlife itself (Driver 1985). Angler's reasons for fishing are important aspects of the wildlife use opportunity which the agencies need to consider when making management decisions (Adams 1979). Thus, harvest may not be the most important aspect for many anglers. The Wyoming study indicates that the angling opportunity becomes more valuable to anglers as the chance of catching more

and bigger fish increases. Therefore, as catch and release angling increases the chance to catch more and perhaps bigger fish, catch and release management can increase the economic value of the recreational fishery. This management approach benefits the majority of the user group and increases the value of the angling opportunity.

East Coast U.S. - Striped Bass Fishery

According to a NOAA statistical study (NOAA Press Release 2000), saltwater recreational fishing is big business, with 62 million trips taken in 1998. The most sought after fish in this survey was the striped bass, of which 90% of the total catch is released. This fishery represents significant benefits to local economies from a primarily catch and release fishery. Tournaments and angling clubs up and down the highly populated East Coast, from South Carolina to Maine, including New York Harbor, focus on the striped bass.

According to Mike Hayden, President of the American Sportfishing Association:

“The striped bass story is a familiar one, but one worthy of retelling. Prior to the 1984 Striped Bass Conservation Act, stocks were so depressed that anglers were rarely targeting this once popular sport fish. However, as the tight restrictions instituted by the act took effect, the populations began rising and sport anglers began enthusiastically returning to the fishery. Today, just fifteen years after the act, anglers are taking advantage of this healthy fishery in record numbers. The improvement from then until now has been nothing short of dramatic. Between 1987 and 1998, the number of angler trips directed to healthy striped bass populations has increased fivefold and the amount of angler expenditures eight-fold” (Hayden 2000).

Hayden (2000) goes on to speak more generally about saltwater recreational angling: “Each fish landed by a sport angler has 40 times the economic value of a fish landed commercially. This amazing productivity would not be possible if not for the angler's voluntary use of a great conservation tool, catch-and-release. According to a recent NMFS study, the overall release rate by recreational anglers has risen to nearly 60%. That's more than a 10% improvement in just the past decade. Many species such as summer flounder, red drum, and striped bass are released alive in proportions well above that national average. While the ability to land a few, good sized fish remains important, I believe the live release of game fish will continue to spread as the accepted ethic of recreational anglers as it has for the past thirty years”.

East Coast Bluefin Tuna Fishery

Despite being the most valuable fish on the planet (a single 400 plus pound fish can be worth thousands of dollars), many bluefin tuna sport-anglers release this magnificent animal. The bluefin is under significant harvest pressure, and populations are at very low levels. Consequently, strict management catch quotas are in place and a fishery can close after a relatively short opening. Bohnsack et al. (in press) studied the Hatteras, N.C. bluefin tuna fishery and found some important economic benefits to catch and release management. “The development of a community-based management strategy for encouraging catch and release fishing was suggested as a useful means for postponing quota closure while fostering more overall fishing expenditures at the local level than would have been the case otherwise”.

Based on a sample of 1,390 bluefin tuna boat trips in 1997, Bohnsack found that anglers who retained legal-sized bluefin tuna spent slightly less on their trip and per day of fishing than

those anglers who caught and released all bluefin tuna. The comparative numbers were \$680 per angler day for anglers whose boats did not retain a tuna vs. \$527 per angler day for anglers whose boats did retain a tuna. Eighty-nine percent of the total boat trips reported landed at least one bluefin tuna. Of these, 51% of boat trips harvested a tuna and 49% of boat trips did not retain a tuna. It is also important to note that almost 30% of the total trips occurred after the fishery was closed to harvest but open for catch and release. The authors believe their findings “should reassure fishery managers that they are not penalizing communities like Hatteras (N.C.) by creating catch and release fishing opportunities”. The authors went on to say, “More anglers who release all of their bluefin tuna can be accommodated in the Hatteras fishery than catch and retain anglers. More trips before quota closure translates into more local direct and indirect economic impacts in the local fishing community”. Catch and release is a proven and valuable management tool for balancing conservation with recreation opportunities. These cases protect the resource while providing economically valuable fisheries for appreciative local communities.

Eastern Canada and U.S. - Atlantic Salmon Fishery

Atlantic salmon is a very important game fish in Eastern Canada, however it is closed to angling in the U.S. because populations are endangered or non-existent. According to one study (Whoriskey and Glebe in press), sport fishing for Atlantic salmon is worth \$360 million to the Maritimes and the provinces of New Brunswick and Quebec. In these regions gear restrictions exist and catch and release fishing is growing in popularity in areas where it is not already mandated, thanks to education and public awareness programs.

“In some jurisdictions, for conservation reasons, anglers are required to release alive any salmon > 63 cm in fork length” (Whoriskey and Glebe, in press). This restriction especially benefits multi-sea-winter salmon that tend to be females with high egg laying ability. Because the great majority of these released fish go on to spawn, some perhaps more than once, “catch and release fishing provides many economic benefits with minimal biological impacts upon salmon populations” (Ibid.). Another fishery that has been able to avoid closure because of catch and release management as opposed to catch and kill is the St. John River system in New Brunswick (Tom Moffatt, Atlantic Salmon Federation, personal communication, 14 Sept 2001).

In the U.S., a study on Atlantic salmon restoration (Kay et al. 1987) conservatively estimated the economic value of salmon existence in 14 New England rivers was \$81.3 million dollars. Adjusted to year 2000 dollars, this is worth approximately \$109 million. The authors admitted this was a very conservative estimate because; 1) they considered that people who did not respond to the survey placed no value on the fish, and 2) they only surveyed a sample of people from New England, assuming that people from outside of New England placed no value on salmon there. It is also important to note that this study used angler surveys to identify a list of reasons why a person would not buy a salmon license in Maine. Of seven reasons, the least significant was “license limitations on fish,” or harvest. More important reasons were, “scarcity of salmon in rivers,” “distance of rivers from home,” and “crowding at fishing sites”. This finding is significant in that it points out that harvest restrictions do not appear to be a primary reason why anglers would not buy a fishing license.

The province of Ontario is also a big supporter of catch and release in addition to selective harvest. Its website (<http://www.mnr.gov.on.ca/mnr/fishing/catrel.html>, Why Practice Live Release?) lists many arguments in favor of release. “Not long ago an angler's expertise was measured in pounds of fillets and photographs with stringers of dead fish. Now, live releasing all or part of the catch is more common, as anglers across Ontario become more conservation-oriented. They realize that no body of water has a limitless supply of fish, and understand that they have a responsibility to protect and improve the fishery. Thanks to this new attitude, more anglers are finding satisfaction in quickly and carefully returning their fish to the water so they can spawn again and be caught again..... The need to practice catch and release fishing is essential to sustaining Ontario's fisheries. Although many anglers are catching more fish than ever before, they are also releasing more than ever. Study after study indicates that live release results in more and larger fish”.

International

Iceland - Atlantic Salmon

There is a growing movement under foot in Iceland to set aside more rivers for catch and release, even where populations are relatively healthy. For example, the Vatnsdalsa River, which has primarily private access, recently went to catch and release for Atlantic salmon (Finkelstein 2000). Initially, detractors predicted this would result in lost bookings on the river. However, two years later the opposite has occurred as they now have more bookings than before the new policy and other lodges are considering following suit. Furthermore, a booking on the Vatnsdalsa River costs over \$1,000 per angler day!

Guy Geffroy, leaseholder of the Vatnsdalsa, states, “We think catch and release will be beneficial, but we can’t prove it yet (3 years into the program). The Argentineans instituted it for sea trout on the Rio Grande in Tierra del Fuego, and it’s gotten much better there. Certainly it can’t hurt here. We told the farmers in advance what we wanted to do, and they were in full agreement”. The Chairman of the North Atlantic Salmon Fund, Orri Vigfusson, believes that “if catch and release were instituted in all of Iceland, the catch rate would increase from the current annual average of 35,000 salmon to 50,000, thereby adding to the value of the resource by enabling leaseholders to sell prime fishing for longer periods” (Finkelstein 2000).

Russia - Atlantic Salmon

Besides Iceland, some of the best angling for Atlantic salmon exists on the Kola Peninsula of the Russian Federation. An important condition for the development of a sports fishing lease in 1991 on the Ponoï River was the initiation of catch and release fishing only except for the harvest of one fish per week for on site consumption (Whoriskey et al, 2000). Obviously the travel costs and dollars expended for a week of fishing here is quite high, but the study focused on the survival rates of angled salmon and recapture rates. Ninety-eight percent of 62 salmon angled and held for 24 hours in a holding cage survived. Also, 11% of previously angled and tagged salmon were caught a second time, and approximately 1% were caught three times. This is strong, positive proof of the economic value of a catch and release fishery while demonstrating a relatively small negative impact on the fish population.

Whoriskey et al. (2000) states, “Catch and release fishing is beginning to be widely implemented as a conservation measure in many jurisdictions..... Since removal of the barrier

fishing weir and beginning of catch and release fishing, juvenile populations in the Ponoï River have been increasing at no costs in individual growth rates..... We have confirmed that caught and released fish have returned as repeat spawners and were angled again. Overall, this suggests that the river has been systematically underseeded for years and that catch and release fishing regime is contributing to its recovery”.

Russia - Steelhead

In Russia, steelhead are listed in the Red Book, the equivalent of the U.S. Endangered Species list. Healthy populations of steelhead exist in some rivers on the Kamchatka Peninsula. In cooperation with the not-for-profit Wild Salmon Center (U.S.) and Russian governmental authorities, fisheries scientists from Moscow State University lead expeditions to study wild steelhead in Kamchatka. Approximately two hundred anglers per year assist in non-lethal, scientific sampling (catch and release angling) which includes taking measurements, scale samples and inserting floy tags prior to release as part of an ongoing research program. These private anglers pay between \$6,500 and \$10,000 including travel for one to two weeks of catch and release fishing opportunities for wild steelhead in a remote, pristine wilderness. This research has identified a tremendous diversity of steelhead life histories not previously described in North American steelhead. Furthermore, the knowledge gained there may help rebuild wild stocks in North America as well as protect the populations in Kamchatka. An additional goal of the program is to develop and provide economic benefits to local communities associated with this non-consumptive utilization of wild steelhead.

Caribbean, Florida, Central America - Billfish, Tarpon, Permit, Bonefish

Saltwater catch and release angling is a tremendous economic engine for some warm-water fisheries in the Caribbean, Florida and Central America. Anglers from all over the world who seek billfish, permit, tarpon, and bonefish support hundreds of lodges and guide services (their direct and indirect expenditures support many other businesses and jobs). The majority of these anglers are seeking exclusively the opportunity to angle these species for sport. Without catch and release angling and a conservation mindset, many of these fish populations could not support the high levels of angler effort that provide such economic benefit to the local communities (Graefe and Ditton).

Recognition Programs

The state of Alaska, the Atlantic Salmon Federation (ASF) and the Billfish Foundation (www.billfish.org) all have programs that recognize and reward catch and release anglers. These programs motivate some people and give them proof that they did something special even when they do not take a fish home. Some organizations also provide educational brochures and videos that demonstrate proper catch and release techniques. Speaking from personal experience, I caught a 19 inch arctic grayling on the Goodnews River in Alaska in 1991 that qualified as a trophy according to the Alaska Department of Fish & Game. After I sent them a photo and a form signed by my fishing partner as a witness, they sent me a patch for my fishing vest and an official certificate that I have framed on the wall. The ASF offers a commemorative catch and release pin and special prizes for the best catch and release photographs (see www.asf.ca/release/incentives.html). Even without such a program, a simple photo can be a much more enduring trophy than a fish in a freezer.

Conclusion

Wild steelhead release fisheries, along with harvest fisheries for hatchery steelhead, can provide a balance of recreation opportunities while erring on the side of wild steelhead conservation. This win-win situation comes with one tradeoff: the elimination of relatively small yet inevitably shrinking wild steelhead harvest opportunities. This is a tradeoff that has already been made throughout North America and the rest of the sportsfishing world. The days of filling coolers with wild steelhead in the continental U.S. have essentially come to a close. It's time to be conservative about wild fish management given their precarious situation.

The examples in this chapter demonstrate that wild steelhead release can have a beneficial economic impact at the state and local levels. It provides millions of local and tourist-generated dollars. Many of the examples featured fisheries that are open for only a few months. Given that steelhead opportunities exist nearly year-round in Washington, wild steelhead release has the potential to provide a tremendous economic benefit. Unfortunately, this potential appears to not have been recognized. The fact that over 80% of harvested steelhead are hatchery origin provides a good indication that license sales will not decline. Hatchery steelhead provide excellent harvest opportunities for many anglers; wild steelhead release fisheries can provide excellent angling opportunities to residents and tourist alike, as well a tremendous legacy for the state and future generations.

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An Analysis of the Foregone Opportunity Doctrine and its Application with Respect to Statewide Release of Wild Steelhead

Introduction

The concept of foregone opportunity has arisen as an issue to consider in the context of a statewide, year round, wild steelhead release regulation. This chapter explains the evolution of the doctrine, and how its application to such a regulation would not allocate the uncaught portion of the non-tribal fishers' share of steelhead to the tribal net fisheries.

Foregone Opportunity

Foregone opportunity is a doctrine that reallocates the unused portion of a treaty or non-treaty fish allocation to the other party. It is intended to reduce the wastage that occurs when the goal of full harvest of the resource will not take place.

Origins of Foregone Opportunity

This doctrine has two legal origins; the “Boldt” decision, *United States v. Washington*, 384 F.Supp. 312 (1974), and the connected cases that followed it, and *Hoh v. Baldridge*, 522 F.Supp. 683 (1981).

The main thrust of the U.S. v. Washington cases was to assure that treaty tribes were allocated and permitted the opportunity to harvest 50% of the harvestable fish that pass through their usual and accustomed off-reservation fishing grounds. Contemporaneously, the non-treaty

fishermen are entitled to the other 50%. "Harvestable fish" means the amount of fish available over and above the calculated escapement for a particular run.

“By dictionary definition and as intended and used in the Indian treaties and in this decision ‘in common with’ means *sharing equally* the opportunity to take fish at ‘usual and accustomed grounds and stations’; therefore, non-treaty fishermen shall have the opportunity to take up to 50% of the harvestable number of fish that may be taken by all fishermen at usual and accustomed grounds and stations and treaty right fishermen shall have the opportunity to take up to the same percentage of harvestable fish...” *U.S. v. Washington*, 384 F.Supp. 312, 343 (1974)(emphasis in original). This rule limits both parties to harvesting “up to” half the run. This “50/50” rule is further supported throughout case law. “Just as the defendant state agencies are in general required to limit nontreaty-right fishermen to a catch of 50% of the harvestable portion of fish runs...the plaintiff tribes in their off-reservation fisheries are required to limit the catch of their members to 50% ...”. *U.S. v. Washington*, 459 F.Supp. 1020, 1047 (1978).

The above cases limit the harvest of each party to 50% of the harvestable fish, but they also require the full utilization of the resource. In discussing reductions of non-treaty fisheries to acquire the 50/50 split, the court stated “...but in making such reductions [the state] will do so consistent with the concept of permitting the full harvest of fish.” *U.S. v. Wa.*, 384 F.Supp at 420. Even more forcefully, the court in a 1985 *U.S. v. Washington* case held the following:

Proper Harvest to Be Assured. Allocations of fish should never be done in a manner which would result either in over-harvest or under-harvest. If a group

of fishermen-be it the treaty fishermen or the non-treaty fishermen-is not in a position to catch all the fish to which it would otherwise be entitled, the remainder should be re-allocated to the other group.

626 F.Supp. 1405, 1420 (1985).

In addition to the re-allocation noted above, the case law allows for equitable adjustments to make up for past inequities in the catch. “An additional equitable adjustment, determined from time to time as circumstances may require, to compensate treaty tribes for the substantially disproportionate numbers of fish, many of which might otherwise be available to treaty right fishermen for harvest, [but were] caught by non-treaty fishermen in marine areas ...” 384 F.Supp. at 344. Essentially this means that either a higher in-river allocation will go to the tribes if offshore fishermen caught more than was expected, or that if more fish are caught by one party one year, an adjustment will be made the following year, or years, to make up the difference.

The last significant factor in these cases regarding foregone opportunity is the “wisest and best use” of a share of the resource. While outlining the state’s power to regulate the fisheries, the court stated that this “power does not include the power to determine for the Indian tribes what is the wisest and best use of their share of the common resource.” 384 F.Supp. at 402. *See also*, 626 F.Supp. at 1426, *citing* 384 F.Supp. at 402. While this holding specifically mentions that the state cannot decide what is the best use of the tribal share of fish, it is somewhat self-evident that it would also work the other way. All of the rulings involving

fisheries attempt to put the state and tribes on equal footing, so the tribes also cannot tell the state what is the wisest and best use of its share.

Summarizing the above, foregone opportunity is based on an initial 50/50 split of harvestable fish, and fisheries ensuring a full harvest. Fish that are not caught by one party may be reallocated to the other to ensure full harvest, but equitable adjustments may be made to make up for disproportionate catches.

Foregone opportunity has developed, with little actual application and no supporting legal rules, as the idea that any fish not actually harvested out of one party's share automatically will be harvested by the other party. The fear here, of course, is that if Washington goes to statewide, year round, wild steelhead release, then there will be no benefit to the fish because the tribes will harvest them anyway.

Application of Foregone Opportunity to Statewide Release of Wild Steelhead

The case that has been cited as the only legal application of foregone opportunity is *Hoh v. Baldrige*, 522 F.Supp. 683 (1981). In that case the state lumped all the coastal coho runs into one number, and then divided that number in half to determine the 50/50 shares of the parties. By lumping all the coho runs together, the non-treaty fishers were able to catch all of the Hoh River's harvestable coho, while in other streams the tribes took well over 50%. The court held that the 50/50 split must be made on a river by river basis so as to preserve access and opportunity for each treaty tribe to their 50% of that river's harvestable surplus.

Frankly, this case does not justify the fear that wild steelhead that are not harvested by state fishers will be caught in tribal net fisheries. All this case held was that each party must have a fair opportunity to catch their share. If anything, it could actually help establish that state fishers have harvested their half of the steelhead, even if wild steelhead release were to be implemented (see below regarding full harvest).

The U.S. v. Washington cases present larger concerns. As noted above, they essentially held that the fish are split 50/50, that all the fish must be harvested, that re-allocations and adjustments can be used to achieve those goals, but that neither party can tell the other what the best and wisest use of their share is.

The main concern with foregone opportunity is that non-treaty fishermen will not be able to harvest their entire share of wild steelhead. The harvest factor has two components that are important. First, what is the reason for the full harvest rule, and two, what constitutes full harvest?

The reason for the full harvest rule is a commercial one. Salmon swimming up rivers are worth money, both to tribal and non-tribal fishermen. If fish are allowed to spawn above escapement levels they will be wasted because their offspring will not necessarily increase the fish runs returning from that brood year, and they will die when they could have been caught and sold.

This reason does not apply to steelhead. First, they are not a major commercial commodity for the tribes, at least compared to salmon, and by law they are not a commercial commodity for non-tribal fishermen. Their commercial value is based on fishing for them, not necessarily catching or killing them. Secondly, steelhead are repeat spawners. They do not necessarily die after mating. A 12% repeat spawn by wild females can provide up to 25% of the eggs deposited that brood year, since repeat spawners produce more eggs than first time spawners (see Starkes, The Importance of Repeat Spawners in Steelhead Populations, this volume). Clearly fish above escapement levels would not be “wasted”.

Full harvest at first blush seems to mean what it says, all the fish caught and sold. However, as the cases show above, it is more important that the parties have an opportunity to achieve full harvest than it is to actually achieve it. Since there is a hooking mortality associated with wild steelhead release, if enough fish are caught and released non-tribal fishers may actually kill enough to “harvest” their half. At least the opportunity exists to do so.

Finally, an argument exists that the state may decide that the wisest and best use of steelhead is to leave them in the river. Since the state does not have a commercial steelhead fishery, it makes more money by having people pay for gas, tackle, licenses, etc., to release wild steelhead.

KINGSLEY Lisa M * ODFW

From: mlfxx2@charter.net
Sent: Tuesday, October 26, 2021 2:03 PM
To: COMMISSION ODFW * ODFW
Subject: Commission Meetings on Rogue/South Coast Multi-Species Conservation and Management Plan (RSP)

Commissiion Members,

My name is Maynard Flohaug stakeholder on the Rogue/Coast Multi-Species Conservation and Management Plan (RSP) for Middle Rogue Steelheaders, previously a Stakeholder on the Chinook Conservation Plan, and an avid fisherman on the Southern Oregon Coastal Rivers.

It is my understanding that the commissioners are considering drastically altering the wild fish harvest portion of the RSP. The harvest component is the foundation which supports the many other components of the plan. The Stakeholders came to agreement after many hours of Zoom meetings where many of the Stakeholder compromised to reach consensus. Consensus was reached based on a plan that allowed native fish harvest for the next 5 years while more exacting monitoring, and data, paid for with increased harvest fees, would be accumulated and analyzed. Again, this is what we agreed to because ODFW encouraged us to compromise and is one of the reasons for having Stakeholders involved in the process. It is what I took back to the Steelheaders to keep them apprised of current developments in the ongoing negotiations with stakeholders and the ODFW. Imagine the frustration, disappointment and even disgust with the process when I inform them that there will be increased fees for monitoring, stricter reporting and enforcement, and little or no harvest on your home streams.

If you, as commissioners make such changes then I, as a stakeholder will request that the Steelheaders withdraw their support for the plan and decline future Stakeholder requests. I respectfully request that ODFW reconvene the stakeholders to discuss the direct affect changes to the harvest component.

Maynard Flohaug stakeholder on the (RSP) for Middle Rogue Steelheaders

KINGSLEY Lisa M * ODFW

From: Willemina Niosi James Hutchison <wilandhutch@gmail.com>
Sent: Friday, October 29, 2021 1:32 PM
To: COMMISSION ODFW * ODFW
Subject: Wild steelhead catch and release

I'm a retired ODFW fish biologist who led the Department's statewide minimum streamflow team for five years in the early 1960s. I was also the District Fish Biologist at Florence between 1966 and 1979 before transferring to Eugene. I strongly concur with the recent wild steelhead catch and release stance taken by three ex- ODFW Commissioners, numerous past and present ODFW biologists and a majority of south coast anglers who have provided recent comments at Commission meetings. It makes no scientific sense to dither before taking protective actions, as has been done way too often in Oregon and elsewhere, while healthy fish populations have been reduced to low or possibly unrecoverable levels. Yes, south coast wild steelhead runs appear healthy, but are they holding steady and what is truly a harvestable excess? - and climate change is now fast upon us.

Those three ex-Commissioners have presented an excellent summary of reasons to rapidly adopt required catch and release for wild steelhead on the south coast, as well as statewide. A five year, or any other, prolonged moratorium before making such a needed decision would be both risky and questionable fish management. Don't wait. Spawning ground counts and snorkeling, even over a span of many years with changing habitat conditions, are far from the best indicators of steelhead population status. And in the long run, catch and release would likely NOT negatively impact coastal economy or steelhead fishing opportunity, but do just the opposite.

Please convey this e-mail to the present ODFW Commissioners and Salem fisheries staff.

Jim Hutchison

360 837-8011

KINGSLEY Lisa M * ODFW

From: J/K Myron <myrons@canby.com>
Sent: Thursday, November 11, 2021 6:10 PM
To: ODFW Commission
Subject: FW: Rogue-South Coast Conservation and Management Plan
Attachments: Greer 97 Clarification of Wildlife Policy.pdf

Sent from [Mail](#) for Windows

From: [J/K Myron](#)
Sent: Thursday, November 11, 2021 6:04 PM
To: ODFWcommission@odfw.oregon.gov
Cc: [Curt Melcher, Director ODF&W](#); [HARRINGTON Michael R * ODFW](#); [CLEMENTS Shaun * ODFW](#)
Subject: Rogue-South Coast Conservation and Management Plan

11.11.21

Members of the Fish and Wildlife Commission
Re: Rogue-South Coast Plan

I appreciate this opportunity to share some thoughts with you about harvesting wild steelhead in the Rogue River and other south coast streams.

The State Wildlife Policy (ORS 496.012) directs the commission to “prevent serious depletion of any indigenous species...” The policy goes on to say that wildlife should be managed to provide for optimum levels of use, including consumptive use. Webster’s definition of optimum talks about the “highest” or “best” level. That level must be determined by the condition of the wildlife resource being harvested.

In several previous letter opinions from the Attorney General, the agency and commission have been advised that “optimum” levels of harvest must be determined by the status and condition of the wildlife resource being proposed for harvest. Optimum utilization can vary from substantial down to as low as zero depending on the status of the resource. The AG also went on to say that the commission and agency’s “overriding obligation” is to protect the resource from being overharvested. (see attd.)

Agency staff seems to believe that wild steelhead populations in this area of the state can withstand the continued “take” of wild steelhead even though they don’t seem to have a sufficient understanding of the population levels of wild

steelhead to confidently make that determination. When data are sparse, the prudent approach to take is to be very cautious about how the resource is allocated.

I support either a complete closure of steelhead fishing in the Rogue and south coast streams or a closely monitored catch and release fishery with barbless hooks and a ban on the use of bait. This regulation should remain in effect until there is a sufficient amount of information about the return of adult wild steelhead to make an informed decision about the future harvest of wild steelhead in this region.

**Thank you,
Jim Myron
Canby, Oregon
Angler, Hunter and Lobbyist (Ret.)**

Sent from [Mail](#) for Windows



MEMORANDUM

Oregon Department of Fish and Wildlife

Date: July 15, 1997

To: All Staff

From: Jim Greer *Jim*

Subject: Clarification of Wildlife Policy

During the legislative session, Oregon Trout introduced Senate Bill 1079 which was intended to clarify parts of the Wildlife Policy as outlined in ORS 496.012. Oregon Trout felt there was a need to clearly indicate that the first obligation of the Fish and Wildlife Commission is to prevent the serious depletion of native species. Their concern was the Commission and the staff was viewing the mandates in the opening paragraph of the Wildlife Policy as equal mandates.

The specific language in question is as follows; "It is the policy of the State of Oregon that the wildlife shall be managed to prevent the serious depletion of any indigenous species and to provide the optimum recreational and aesthetic benefits for present and future generations of the citizens of the state". The interpretation of the underline portion of the policy was the crux of Oregon Trout's concern. In our testimony on the bill, we pointed out that our attorney's, on several occasions, had advised the Commission that these mandates to the Commission are not to be considered equally.

Our attorneys have stated that although "ORS 496.012 provides these statements in an equal manner, we understand that optimum recreational and aesthetic benefits can only exist to the extent that serious depletion of a species is prevented. Where a species is seriously depleted, it will not be possible for optimum benefits to be provided. Accordingly, the Commission's and the Department's overriding obligation is to manage to prevent the serious depletion, which thereby enables the Department and the Commission to provide optimum recreational and aesthetic benefits.

Office of the Director

2501 SW First Avenue, P.O. Box 59, Portland, Oregon 97207, Tele: (503) 872-5272 FAX: (503) 872-5276

Oregon Trout's response to this information was that this interpretation had not been well distributed to the staff. That is certainly possible but it is a problem we can and will correct. Although Senate Bill 1079 did not pass out of committee, we did agree to provide our attorney's interpretation of this portion of the Wildlife policy to all of our staff. With that in mind, I am sending this memo to all fixed stations with the understanding that copies will be made available for all employees at that station to read and use in any future discussions of statutory mandates in the policy.

Please call if you have questions concerning the information in this memo.

cc: Fish and Wildlife Commission
Executive Management Team
Jim Myron, Oregon Trout
Senator Bob Kintigh
Paula Burgess

KINGSLEY Lisa M * ODFW

From: John Mikenis <jmikenis@comcast.net>
Sent: Thursday, November 18, 2021 8:36 AM
To: COMMISSION ODFW * ODFW
Subject: Wild Winter Steelhead Southwest Zone
Attachments: ODFW Letter 10.07.21.pdf

John Mikenis
Sent from my iPhone

11.18.21

Good morning ODFW Commissioners...

I am once again writing along with many stakeholders from across the State to support catch and release regulations for wild winter steelhead in the southwest zone. I ask that regulations halting the harvest of wild steelhead be put in place until population and harvest data ensure our wild steelhead can sustain additional pressure from harvest fisheries.

Why when faced with evidence of steeply declining steelhead fisheries, is the State of Oregon the only jurisdiction on the entire West Coast that allows the continuing harvest of wild steelhead? ("Wild steelhead harvest from 2002 - 2016 has increased; from around 1600-2400 wild steelhead harvested to approximately 2200-3400 fish harvested per year (ODFW unpublished data, obtained through public records request)").

I think it fair to say, that all steelhead stakeholders desire a healthy and robust population of the species. But as Peter Drucker has said, "if you can't measure it, you can't improve it". Drucker means that you can't know whether or not you are successful unless success is defined and tracked. With an established metric for success, you can quantify progress and adjust your process to produce the desired outcome. Without clear objectives, you're stuck in a constant state of guessing."

Let's not be guessing about steelhead any longer in the State of Oregon.

Thank you for your consideration and time in this important matter.

John Mikenis
7401 SW Daisy
Aloha, OR 97007
503-530-6141
Jmikenis@comcast.net
Hunter/Angler ID#: 1246844
Member: Native Fish Society

John Mikenis
Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Ken Morrish <ken@flywatertravel.com>
Sent: Thursday, November 18, 2021 3:51 PM
To: COMMISSION ODFW * ODFW
Subject: Steelhead Release Regs

Thanks you ODFW Commissioners for what you do. Thank you for giving me the opportunity to testify.

I am Ken Morrish. I am a passionate angler and have dedicated my entire adult life to both promoting and protecting fisheries with a personal emphasis on the anadromous fisheries of the greater Pacific Rim. I, along with my business partner Brian Geis founded FlyWater Travel in 1999. We are a fly fishing travel company based in the Rogue Valley. Our business has grown to support a full-time staff of 11. A large part of our business is based upon selling steelhead and salmon fishing trips in the Pacific Northwest, BC, and Alaska. In recent years it has become clear that in particular, steelhead and chinook salmon are in trouble in the regions in which we do business. This has affected our business economically, especially this past season.

There has been a clear downward trend in angler success in the regions we sell trips for in recent years, a trend which has hopefully peaked this past summer and fall. This trend is being seen here in Oregon. This past season has been, well, catastrophic in relation to other down years. The Skeena system in British Columbia has suffered the worst returns in recorded history, forcing an early closure of all rivers in the system this fall. Closer to home the Columbia system including the Deschutes, and the John Day, have been closed to steelhead fishing most of the season. Perhaps the most hallowed of all steelhead rivers, the N. Umpqua, has also been closed. This summer the North has also had her worst steelhead run on record, by far, with only 457 fish having returned as of Sept 1. The run is 1/10th of the past ten-year average. Biologists have reacted in a retrospective manner to these disasters with fish closures.

Clearly the environment for steelhead and salmon is changing rapidly and regulators are changing far too slowly. Climate change has brought big changes already, and these are predicted to only worsen in upcoming years. Our fish face severe stressors that are not easily managed. The one variable we can control is if we kill, or release, wild fish. It is impossible for us to know what the future runs will be. But clearly, the challenges of climate change will impact these fish.

The economic impact of closed seasons has been devastating this year. Ask the owners of the Steamboat Lodge on the N. Umpqua, or those of the Dogwood Inn. Ask Deschutes guides Marty and Mia Sheppard, or Dillon Renton who guides on both the North Umpqua and the Deschutes. Ask them how a river closure has impacted them this season, and they what they think the future holds for their businesses on these rivers. Ask the shuttle drivers, the tavern owners, the cooks, and waitresses in places like Glide and Maupin what a river closure because of dismal wild fish returns means. Our Fly Water Travel accountant would tell a similar story. We are losing a cornerstone category of our business due to regulators doing what is easiest as opposed to doing what is right.

Wild fish are protected all along the West Coast, except on the Rogue and our South Coast rivers. Fisheries managers in British Columbia, Washington, California, and the North Oregon Coast, have chosen to protect these wild fish. What clearcut data is there that you have seen, that Rogue and South Coast wild fish don't need these same protections? We must join the other regions in protecting these fish. Our region should be a refuge for wild fish, not a killing ground. These

genetics are more important now than ever before. We must protect these fish for the next five years with a no-kill policy while we study the real run size and vitality of these fish and this resource. See what the trends are. Get some comprehensive data on each river system. This will not lead to economic ruin. This is proven by the robust Winter Steelhead fishery on the N. Umpqua, where not that long ago the kill of wild fish was banned. Since these no-kill rules were implemented this fishery continues to support a healthy sport fishing economy. Let's protect these fish in OUR region; in the Rogue, the Illinois The Winchuck and the Pistol, Hunter Creek, the Chetco, the Elk, and Sixes. Let's support these fisheries by not killing the fish. If you must error, error on the side of protecting these magnificent fish. Protect them for our future generations to enjoy.

Thank you.

Ken Morrish

Fly Water Travel

479 Russell St, #103 • Ashland, OR 97520

[800.552.2729](tel:800.552.2729) • [541.488.7159](tel:541.488.7159)

[Web](#) | [News](#) | [Facebook](#) | [Instagram](#)

KINGSLEY Lisa M * ODFW

From: John Jezuit <jezuitj@co.curry.or.us>
Sent: Friday, November 19, 2021 11:00 AM
To: COMMISSION ODFW * ODFW
Cc: Anthony Pope
Subject: Curry-Rogue Stratum South Coast/Rogue Multi-Species Conservation Plan
Attachments: 2021_11_18 Curry-Rogue Stratum South Coast Rogue Multi-Species Conservation Plan.pdf

Hello –

Please distribute the attached to Director Melcher, ODFW Commissioners, and Staff.

Thank you.

John T. Jezuit

Administrative Assistant

Curry County Board of Commissioners' Office

541 247 3296

jezuitj@co.curry.or.us



CURRY COUNTY
BOARD OF COMMISSIONERS

JOHN HERZOG, CHAIR
CHRISTOPHER PAASCH, VICE CHAIR
COURT BOICE, COMMISSIONER

94235 Moore Street | Suite #122
Gold Beach, OR 97444
(541) 247-3296 | (541) 247-2718 Fax
(800) 243-1996 | www.co.curry.or.us

November 17, 2021

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

Re: ODFW - Curry-Rogue Stratum
South Coast / Rogue Multi-Species Conservation Plan

Director Melcher, O.D.F.W. Commissioners, and Staff:

As you are likely aware, the South Coast Multi-Species Conservation Plan is entirely located in Curry County, as well as about 30% of the Rogue Multi-Species Conservation Plan. The Rogue River produces over 50% of all Oregon Salmon and Steelhead outside the Columbia Basin, with 100% of Rogue River Salmon and Steelhead passing through Curry County. The Rogue system includes the Applegate and Illinois Rivers as well; the other major Steelhead Rivers covered in the Conservation Plan are the Chetco and Elk. It is important to note there are several other Winter Steelhead rivers within Curry County that are addressed in the South Coast Multi-Species Conservation Plan.

South Coast streams and the Rogue River are not comparable to other localities in the State or surrounding area, such as the Columbia River. Both Rogue and South Coast Stratum populations are healthy, viable, and otherwise not limited by sport harvest.

Oregon Department of Fish and Wildlife Staff named three harvest limit options from zero (0) to one (1) and five (5), even after receiving a request from the Curry County stakeholder representative

to include Zone Regulation of Two (2) and Ten (10). It is our understanding that the stakeholder representatives were assured a level playing field; however, these considerations were not included as an option. This could be interpreted as bias being shown by Fish and Wildlife Staff. The harvests on our South Coast Streams of Wild Stocks are already constrained at 1 and 5 or less for Winter Steelhead, Summer Steelhead, Coho Salmon and Cutthroat Trout allow no Wild Harvest at all.

Furthermore, stakeholders and staff spent a great deal of time and effort crafting this Plan, and there was a majority agreement between all involved parties to maintain harvest allowances on affected waterways. To contradict this agreement and adopt a proposal for “catch and release” policies for wild Winter Steelhead directly opposes the understanding of the stakeholder representatives, and that would certainly reduce or eliminate the need for future monitoring as well as the proposed endorsement and harvest fees negotiated with the understanding that there ample harvest opportunities would continue.

Curry County Commissioners support 1/5 harvest limit for all streams except Brush Creek and N. Fork of the Smith River with the understanding with Winter Steelhead population growth harvest could be expanded. If catch and release or 1 and 3 harvest limit proposals are implemented, it will violate the agreements and compromises made during the stakeholder process and as a result destroy stakeholder confidence as this process moves forward.

Please review the enclosed historic seining counts taken at Huntley Park to support the fact that there no critical declines in Winter Steelhead (view Half-Pounder counts), Coho Salmon or Summer Steelhead adults. In fact, populations are increasing significantly. We ask that you be aware of the that Fish and Wildlife staff uses Rogue Half-Pounder returns which to judge the strength of Winter Steelhead on other South Coast rivers as well as the Rogue.

In 2015, the 10-year average of ½ pounders at Huntley Park Seining was 1519. In 2021, that average had increased to 2569 - nearly 70% higher. Half-pounder counts are used to predict Winter Steelhead returns on South Coast streams, as well as the Rogue River.

Further, Page 4 of the attached Commission Draft RSP states:

“Wild winter steelhead and coastal cutthroat trout are widespread, abundant, and are expected to persist through time.”

Due to the remarkability of these fish runs and their importance to the economy of Curry County and the State as a whole, our County wishes to provide significant input insofar as the proceedings of the proposed Conservation Plans. The Curry County Board of Commissioners would respectfully remind the reader that the Conservation Plans recently proposed by Staff are aligned with the Native

Fish Conservation Policy, which provides for the conservation of the cultural and economic well-being of our communities and the surrounding areas concurrently with conservation of the resource.

Thank you for your dedication and contributions to our great State of Oregon.

Sincerely,

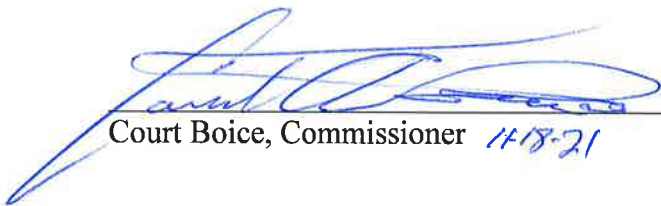
Curry County Board of Commissioners



John Herzog, Chair



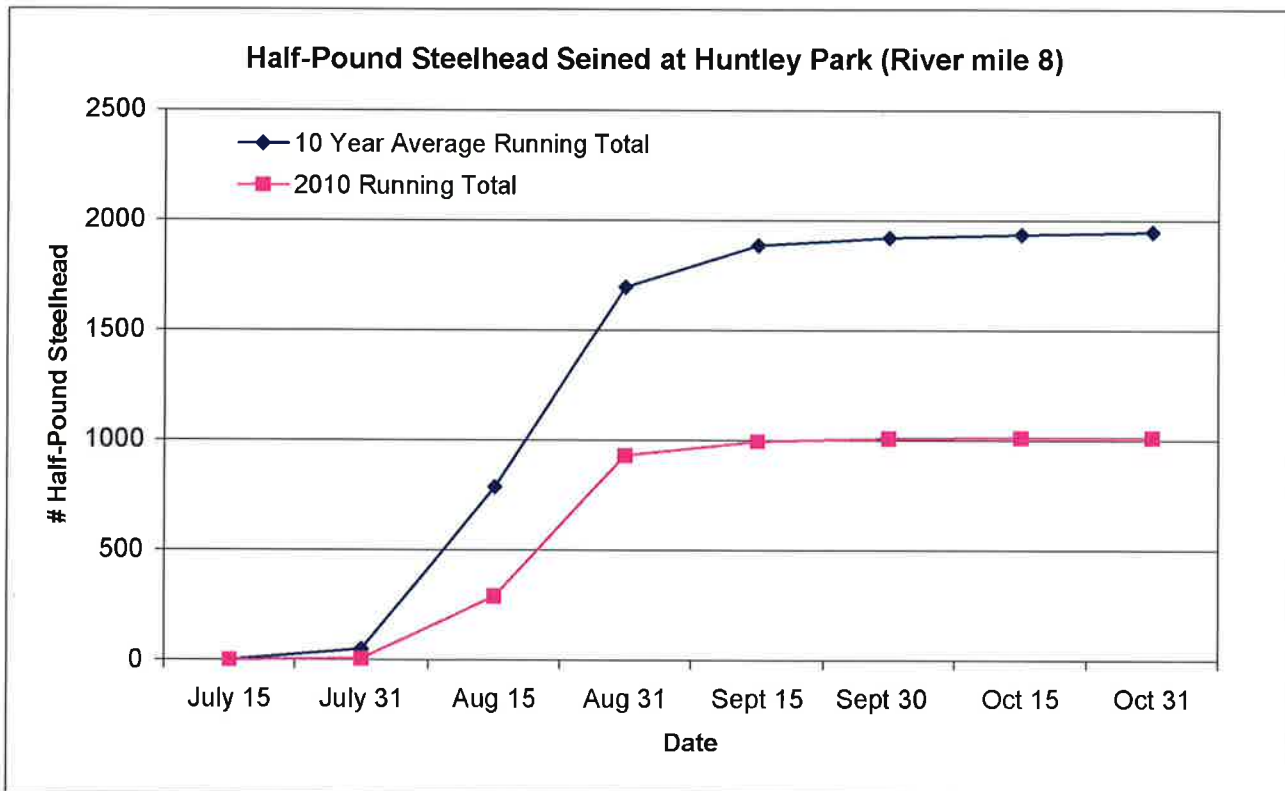
Christopher Paasch, Vice-Chair



Court Boice, Commissioner 1/18/21

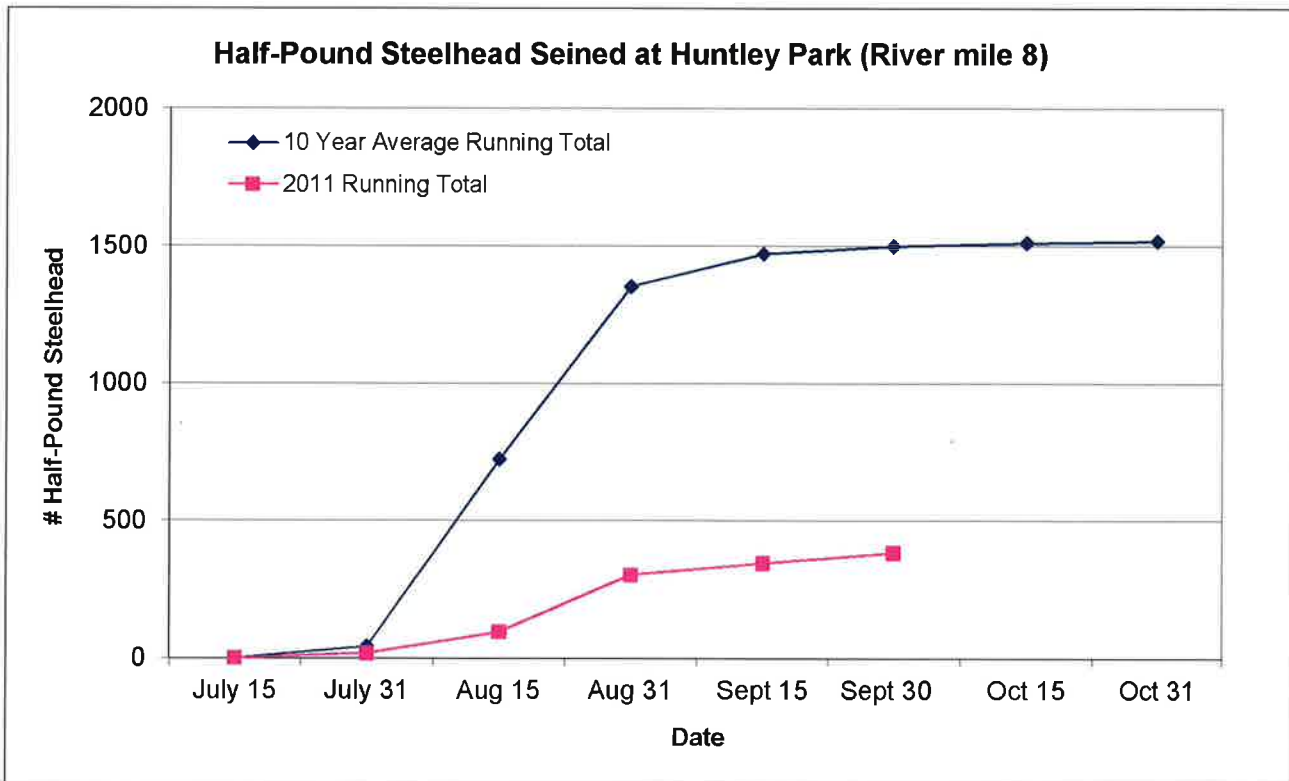
Lower Rogue Seining Project at Huntley Park
Run Tracking Information
2010 Half-Pound Steelhead

	Current Year Data		2-Week Period Total	2010 Running Total	2010 % 10 Year Average	10 Year Average	10 Year Average (Running Total)
2-Week Sample Period (End Date)	# Fish						
	Wild	Hatchery					
July 15	0	0	0	0	0.0	0	0
July 31	3	2	5	5	10.0	50	50
Aug 15	100	183	283	288	36.7	735	785
Aug 31	194	448	642	930	54.8	911	1696
Sept 15	16	49	65	995	52.8	189	1885
Sept 30	3	10	13	1008	52.5	37	1922
Oct 15	2	1	3	1011	52.2	13	1935
Oct 31	0	1	1	1012	52.0	11	1946



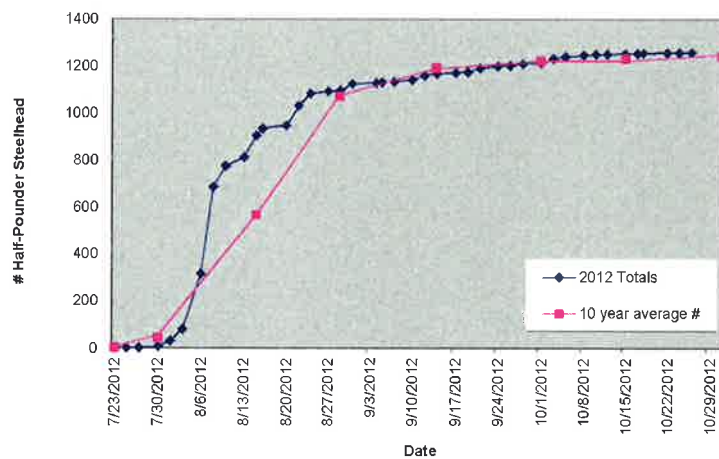
Lower Rogue Seining Project at Huntley Park
Run Tracking Information
2011 Half-Pound Steelhead

2-Week Sample Period (End Date)	Current Year Data		2-Week Period Total	2011 Running Total	2011 % 10 Year Average	10 Year Average	10 Year Average (Running Total)
	Wild	Hatchery					
July 15	0	0	0	0	0.0	0	0
July 31	10	7	17	17	40.5	42	42
Aug 15	33	45	78	95	13.1	681	723
Aug 31	99	109	208	303	22.4	629	1352
Sept 15	23	19	42	345	23.5	119	1471
Sept 30	10	28	38	383	25.6	28	1499
Oct 15					0.0	12	1511
Oct 31					0.0	7	1518



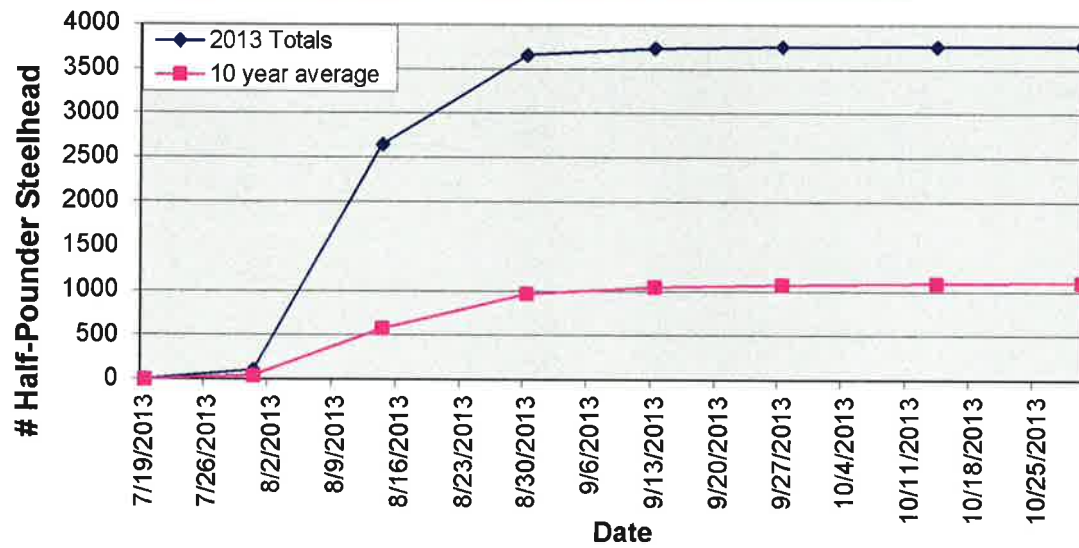
Steelhead Half-Pounders				
Date	Wild	Hatchery	Daily Catch	Cumulative Total
7/23/2012	0	0	0	0
7/25/2012	0	0	0	0
7/27/2012	0	0	0	0
7/30/2012	4	1	5	5
8/1/2012	11	14	25	30
8/3/2012	20	30	50	80
8/6/2012	70	165	235	315
8/8/2012	103	266	369	684
8/10/2012	29	61	90	774
8/13/2012	10	28	38	812
8/15/2012	23	68	91	903
8/16/2012	8	23	31	934
8/20/2012	4	9	13	947
8/22/2012	24	59	83	1030
8/24/2012	16	36	52	1082
8/27/2012	5	4	9	1091
8/29/2012	1	3	4	1095
8/31/2012	11	17	28	1123
9/4/2012	1	2	3	1126
9/5/2012	1	2	3	1129
9/7/2012	1	2	3	1132
9/10/2012	3	5	8	1140
9/12/2012	9	9	18	1158
9/14/2012	2	6	8	1166
9/17/2012	4	0	4	1170
9/19/2012	3	0	3	1173
9/21/2012	6	10	16	1189
9/24/2012	3	7	10	1199
9/26/2012	0	2	2	1201
9/28/2012	2	6	8	1209
10/1/2012	1	3	4	1213
10/3/2012	3	15	18	1231
10/5/2012	1	7	8	1239
10/8/2012	3	3	6	1245
10/10/2012	0	4	4	1249
10/12/2012	0	1	1	1250
10/15/2012	0	2	2	1252
10/17/2012	0	1	1	1253
10/18/2012	1	0	1	1254
10/22/2012	0	2	2	1256
10/24/2012	0	0	0	1256
10/26/2012	0	1	1	1257
10/29/2012				
10/31/2012				1239

2012 Half-Pounder Steelhead Daily Totals - Seined at Huntley Park
(River Mile 8)



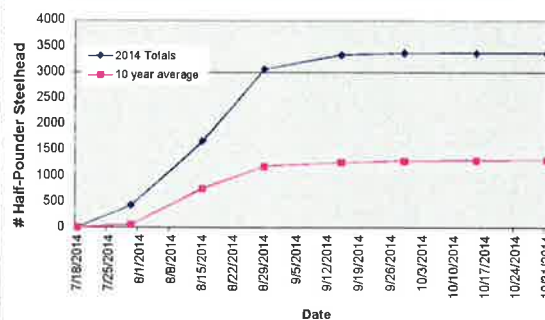
	Steelhead Half-Pounders					
Date	Wild	Hatchery	Daily Catch	2 week Cumulative	Cumulative Total	10 year Average
7/19/2013	0	2	2	2	2	0
7/22/2013	3	1	4		6	
7/24/2013	1	5	6		12	
7/26/2013	2	3	5		17	
7/29/2013	12	9	21		38	
7/31/2013	31	36	67	105	105	42
8/2/2013	42	43	85		190	
8/5/2013	388	568	956		1146	
8/7/2013	227	298	525		1671	
8/9/2013	226	193	419		2090	
8/12/2013	124	166	290		2380	
8/14/2013	124	144	268	2648	2648	574
8/16/2013	103	96	199		2847	
8/19/2013	129	133	262		3109	
8/21/2013	101	105	206		3315	
8/23/2013	22	18	40		3355	
8/26/2013	34	18	52		3407	
8/28/2013	29	22	51		3458	
8/30/2013	91	107	198	3656	3656	965
9/2/2013	12	13	25		3681	
9/4/2013	21	13	34		3715	
9/6/2013	11	3	14		3729	
9/9/2013	2	4	6		3735	
9/11/2013	0	0	0		3735	
9/13/2013	0	0	0	3735	3735	1044
9/16/2013	3	0	3		3738	
9/18/2013	0	0	0		3738	
9/20/2013	1	0	1		3739	
9/23/13	5	5	10		3749	
9/25/2013	2	0	2		3751	
9/27/2013	0	2	2	3753	3753	1076
9/30/2013	no sampling; high flows					
10/2/2013	no sampling; high flows					
10/3/2013	1	1	2		3755	
10/4/2013	0	0	0		3755	
10/7/2013	0	0	0		3755	
10/9/2013	0	0	0		3755	
10/11/2013	0	1	1		3756	
10/14/2013	1	0	1	3757	3757	1091
10/16/2013	0	0	0		3757	
10/18/2013	0	0	0		3757	
10/21/2013	0	0	0		3757	
10/23/2013	0	0	0		3757	
10/25/2013	0	1	1		3758	
10/28/2013	0	0	0		3758	
10/30/2013	0	0	0	3758	3758	1099

**2013 Half-Pounder Steelhead Daily Totals - Seined at
Huntley Park (River Mile 8)**



Steelhead Half-Pounders						
Date	Wild	Hatchery	Daily Catch	2 year Cumulative	Cumulative Total	10 year Average
7/16/2014	1	0	1		1	
7/18/2014	5	0	5	1	6	0
7/21/2014	1	3	4		10	
7/23/2014	31	11	42		52	
7/25/2014	25	8	33		85	
7/28/2014	114	81	195		280	
7/30/2014	89	62	151	431	431	52
8/1/2014	20	20	40		471	
8/4/2014	35	27	62		533	
8/6/2014	126	78	204		737	
8/8/2014	146	95	241		978	
8/11/2014	73	103	176		1154	
8/13/2014	168	92	260		1414	
8/15/2014	116	136	252	1666	1666	753
8/18/2014	239	315	554		2220	
8/20/2014	118	142	260		2480	
8/22/2014	19	26	45		2525	
8/25/2014	85	163	248		2773	
8/27/2014	44	108	152		2925	
8/29/2014	48	91	139	3064	3064	1184
9/2/2014	14	47	61		3125	
9/3/2014	17	61	78		3203	
9/5/2014	7	11	18		3221	
9/8/2014	8	18	26		3247	
9/10/2014	5	35	40		3287	
9/12/2014	9	35	44		3331	
9/15/2014	2	7	9	3340	3340	1260
9/17/2014	2	6	8		3348	
9/19/2014	0	5	5		3353	
9/22/2014	2	8	10		3363	
9/24/2014	2	1	3		3366	
9/26/2014	1	0	1		3367	
9/29/2014	2	6	8	3375	3375	1290
10/1/2014	0	0	0		3375	
10/3/2014	0	0	0		3375	
10/6/2014	0	0	0		3375	
10/8/2014	0	0	0		3375	
10/10/2014	1	1	2		3377	
10/13/2014	0	0	0		3377	
10/15/2014	0	0	0	3377	3377	1303
10/17/2014	1	0	1		3378	
10/20/2014	0	0	0		3378	
10/22/2014	0	0	0		3378	
10/24/2014					3378	
10/28/2014	0	0	0		3378	
10/29/2014					3378	
10/31/2014				3378	3378	1310

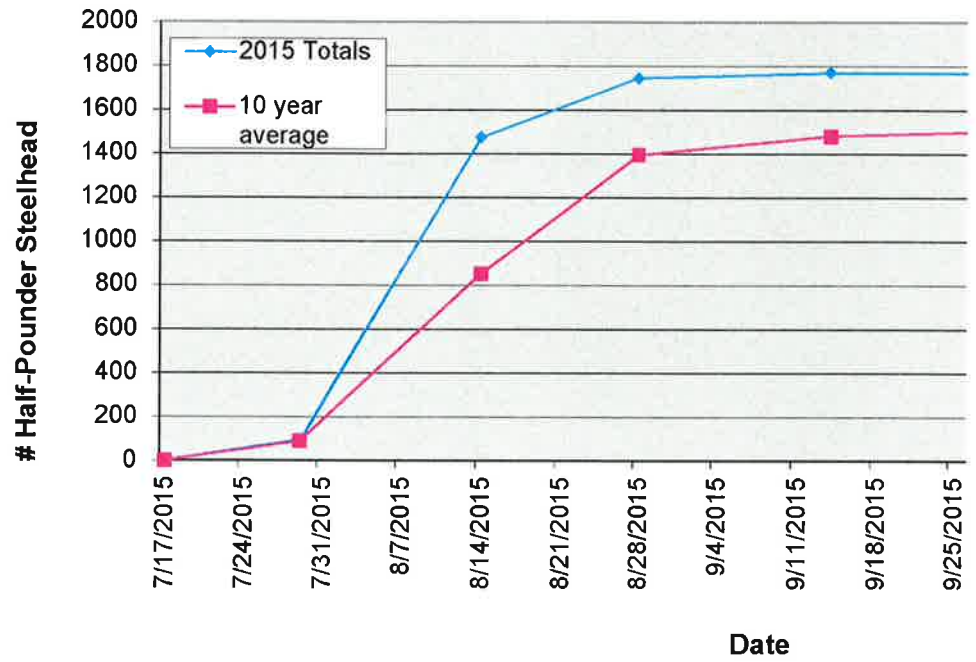
2014 Half-Pounder Steelhead Daily Totals - Seined at Huntley Park (River Mile 8)



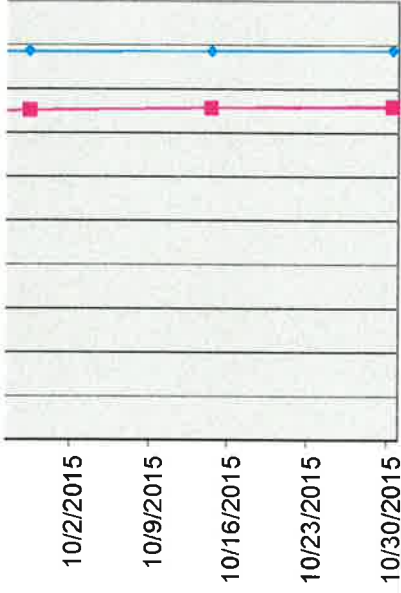
Reflects adjustment of 3 fish added to 09/19/2014 catch.
Does not include Escaped fish.

Steelhead Half-Pounders						
Date	Wild	Hatchery	Daily Catch	2 week Cumulative	Cumulative Total	10 year Average
7/15/2015	-	-	-	-	-	0
7/17/2015	6	12	18		18	
7/20/2015	2	3	5		23	
7/22/2015	0	0	0		23	
7/24/2015	3	3	6		29	
7/27/2015	3	4	7		36	
7/29/2015	36	15	51		87	
7/31/2015	5	1	6	93	93	89
8/3/2015	127	89	216		309	
8/5/2015	91	140	231		540	
8/7/2015	78	99	177		717	
8/10/2015	36	82	118		835	
8/12/2015	148	247	395		1230	
8/14/2015	69	176	245	1475	1475	852
8/17/2015	39	88	127		1602	
8/19/2015	24	42	66		1668	
8/21/2015	5	7	12		1680	
8/24/2015	5	7	12		1692	
8/26/2015	7	19	26		1718	
8/28/2015	3	9	12		1730	
8/31/2015	5	12	17	1747	1747	1394
9/2/2015	8	13	21		1768	
9/4/2015	1	1	2		1770	
9/8/2015	0	0	0		1770	
9/9/2015	1	0	1		1771	
9/11/2015	0	0	0		1771	
9/14/2015	0	0	0	1771	1771	1481
9/16/2015	0	0	0		1771	
9/18/2015	0	0	0		1771	
9/21/2015	0	0	0		1771	
9/23/2015	0	0	0		1771	
9/25/2015	0	0	0		1771	
9/28/2015	0	0	0		1771	
9/30/2015	0	0	0	1771	1771	1503
10/2/2015	0	0	0		1771	
10/5/2015	0	0	0		1771	
10/7/2015	0	0	0		1771	
10/9/2015	0	0	0		1771	
10/12/2015	0	1	1		1772	
10/14/2015	0	0	0	1772	1772	1513
10/16/2015	0	0	0		1772	
10/19/2015	0	0	0		1772	
10/21/2015	0	0	0		1772	
10/23/2015	0	0	0		1772	
10/26/2015	2	0	2		1774	
10/28/2015	0	0	0		1774	
10/30/2015	0	0	0	1774	1774	1519

**2015 Half-Pounder Steelhead Daily Totals - Seined at Huntley
(River Mile 8)**

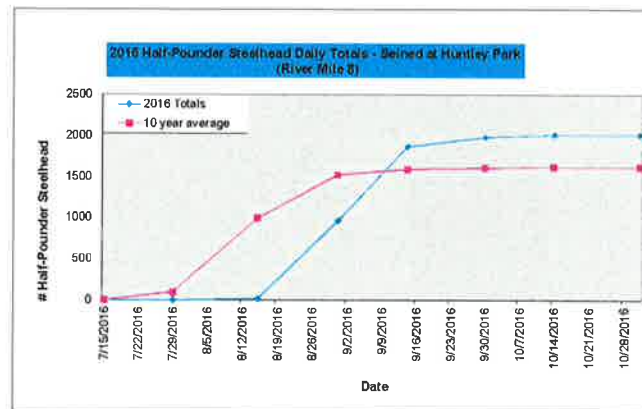


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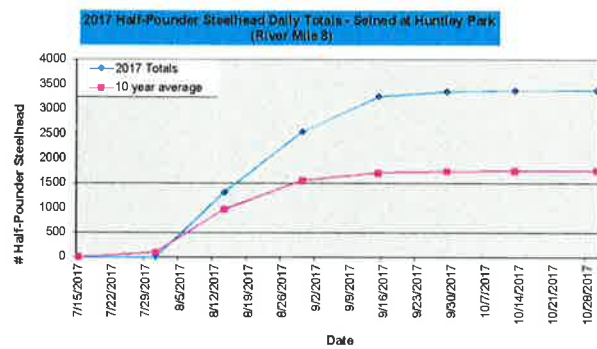


Steelhead Half-Pounders						
Date	Wild	Hatchery	Daily Catch	2 week Cumulative	Cumulative Total	10 year Average
7/15/2016	-	-	-	-	-	0
7/18/2016	-	-	-	-	-	-
7/20/2016	-	-	-	-	-	-
7/22/2016	-	-	-	-	-	-
7/25/2016	0	0	0	-	0	-
7/27/2016	0	0	0	-	0	-
7/29/2016	0	0	0	0	0	96
8/1/2016	0	0	0	-	0	-
8/3/2016	0	0	0	-	0	-
8/5/2016	4	1	5	-	5	-
8/8/2016	3	1	4	-	9	-
8/10/2016	3	0	3	-	12	-
8/12/2016	1	4	5	-	17	-
8/15/2016	2	1	3	20	20	994
8/17/2016	1	0	1	-	21	-
8/19/2016	21	16	37	-	58	-
8/22/2016	59	29	88	-	146	-
8/24/2016	167	124	291	-	437	-
8/26/2016	213	145	358	-	795	-
8/29/2016	45	12	57	-	852	-
8/31/2016	73	39	112	964	964	1523
9/2/2016	160	185	345	-	1309	-
9/6/2016	107	172	279	-	1588	-
9/7/2016	32	80	112	-	1700	-
9/9/2016	11	13	24	-	1724	-
9/12/2016	12	36	48	-	1772	-
9/14/2016	21	75	96	1868	1868	1592
9/16/2016	11	17	28	-	1896	-
9/19/2016	5	24	29	-	1925	-
9/21/2016	2	28	30	-	1955	-
9/23/2016	3	9	12	-	1967	-
9/26/2016	3	0	3	-	1970	-
9/28/2016	2	6	8	-	1978	-
9/30/2016	1	3	4	1982	1982	1611
10/3/2016	0	3	3	-	1985	-
10/5/2016	0	2	2	-	1987	-
10/7/2016	3	9	12	-	1999	-
10/10/2016	3	6	9	-	2008	-
10/12/2016	1	4	5	-	2013	-
10/14/2016	*	*	*	2013	2013	1620
10/17/2016	*	*	*	-	2013	-
10/19/2016	*	*	*	-	2013	-
10/21/2016	*	*	*	-	2013	-
10/24/2016	*	*	*	-	2013	-
10/26/2016	*	*	*	-	2013	-
10/28/2016	*	*	*	-	2013	-
10/31/2016	*	*	*	2013	2013	1621

*NO SEINING ACTIVITY DUE TO HEIGHTENED FLOWS



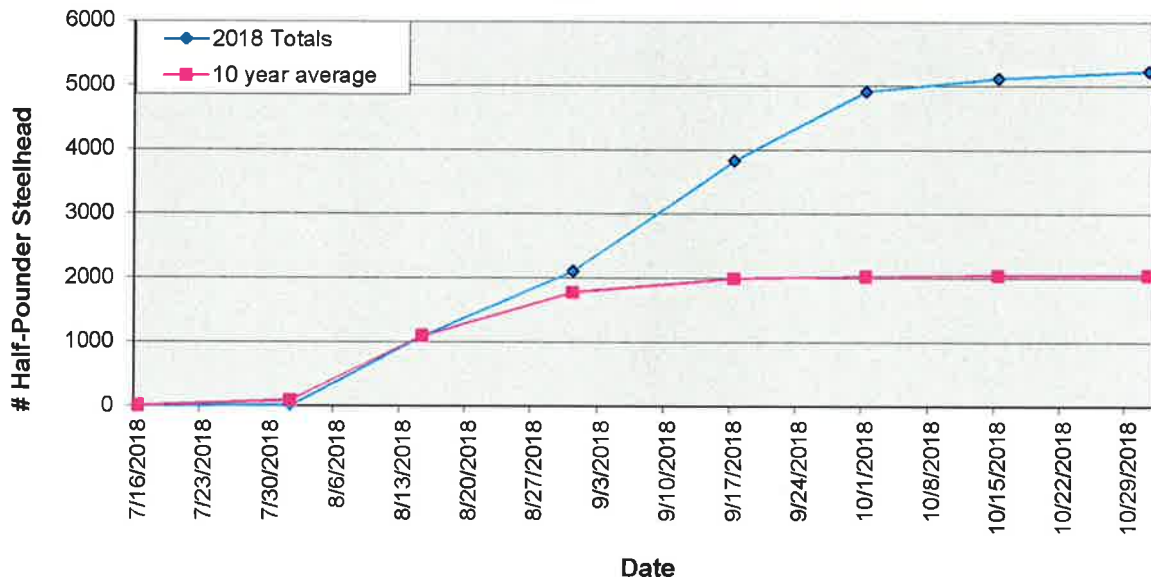
Steelhead Half-Pounders						
Date	Wild	Hatchery	Daily Catch	2 week Cumulative	Cumulative Total	10 year Average
7/15/2017	0	0	0	0	0	0
7/17/2017	0	0	0	0	0	
7/19/2017	0	0	0	0	0	
7/21/2017	0	0	0	0	0	
7/24/2017	0	0	0	0	0	
7/28/2017	0	0	0	0	0	
7/29/2017	0	0	0	0	0	
7/31/2017	0	0	0	0	0	96
8/2/2017	0	0	0	0	0	
8/4/2017	0	0	0	0	0	
8/7/2017	17	25	42	42	42	
8/9/2017	148	301	449	449	491	
8/11/2017	123	279	402	402	893	
8/14/2017	147	284	431	1324	1324	974
8/17/2017	35	53	86	86	1410	
8/19/2017	27	57	84	84	1494	
8/21/2017	56	51	107	107	1601	
8/23/2017	91	111	202	202	1803	
8/25/2017	50	110	160	160	1963	
8/28/2017	118	126	444	444	2407	
8/30/2017	62	72	134	2541	2541	1555
9/1/2017	33	65	98	98	2639	
9/5/2017	51	159	210	210	2849	
9/6/2017	19	78	97	97	2946	
9/8/2017	10	66	76	76	3022	
9/11/2017	7	53	60	60	3082	
9/13/2017	10	53	63	63	3145	
9/15/2017	20	89	109	109	3254	1711
9/18/2017	5	31	36	36	3290	
9/20/2017	1	2	3	3	3293	
9/22/2017	3	13	16	16	3309	
9/25/2017	0	10	10	10	3319	
9/27/2017	0	9	9	9	3328	
9/29/2017	8	22	30	3358	3358	1741
10/2/2017	0	7	7	7	3365	
10/4/2017	0	1	1	1	3366	
10/6/2017	0	1	1	1	3367	
10/9/2017	0	4	4	4	3371	
10/11/2017	0	0	0	0	3371	
10/13/2017	0	6	6	3377	3377	1752
10/16/2017	0	1	1	1	3378	
10/18/2017	1	1	2	2	3380	
10/20/2017	0	0	0	0	3380	
10/23/2017	0	2	2	2	3382	
10/25/2017	0	0	0	0	3382	
10/27/2017	0	0	0	0	3382	
10/30/2017	0	0	0	3382	3382	1753



Steelhead Half-Pounders

Date	Wild	Hatchery	Daily Catch	2 week Cumulative	Cumulative Total	10 year Average
7/16/2018	0	0	0	0	0	0
7/18/2018	0	0	0		0	
7/20/2018	2	0	2		2	
7/23/2018	0	2	2		4	
7/25/2018	0	0	0		4	
7/27/2018	0	0	0		4	
7/30/2018	1	1	2	6	6	89
8/1/2018	37	15	52		58	
8/3/2018	44	47	91		149	
8/6/2018	43	40	83		232	
8/8/2018	132	152	284		516	
8/10/2018	124	115	239		755	
8/13/2018	88	130	218		973	
8/15/2018	56	61	117	1090	1090	1094
8/17/2018	52	63	115		1205	
8/20/2018	113	165	278		1483	
8/22/2018	72	121	193		1676	
8/24/2018	31	37	68		1744	
8/27/2018	56	69	125		1869	
8/29/2018	61	78	139		2008	
8/31/2018	49	51	100	2108	2108	1771
9/4/2017	158	326	484		2592	
9/5/2017	89	148	237		2829	
9/7/2017	76	133	209		3038	
9/10/2018	73	262	335		3373	
9/12/2018	52	194	246		3619	
9/14/2018	52	160	212	3831	3831	1992
9/17/2018	69	345	414		4245	
9/19/2018	62	256	318		4563	
9/21/2018	8	56	64		4627	
9/24/2018	5	32	37		4664	
9/26/2018	12	33	45		4709	
9/28/2018	32	149	181		4890	
10/1/2018	5	19	24	4914	4914	2031
10/3/2018	0	7	7		4921	
10/5/2018	37	131	168		5089	
10/8/2018	1	6	7		5096	
10/10/2018	1	7	8		5104	
10/12/2018	0	3	3		5107	
10/15/2018	1	11	12	5119	5119	2043
10/17/2018	0	3	3		5122	
10/19/2018	0	14	14		5136	
10/22/2018	9	61	70		5206	
10/24/2018	1	7	8		5214	
10/26/2018	1	3	4		5218	
10/29/2018	1	1	2		5220	
10/31/2018	2	6	8	5228	5228	2045

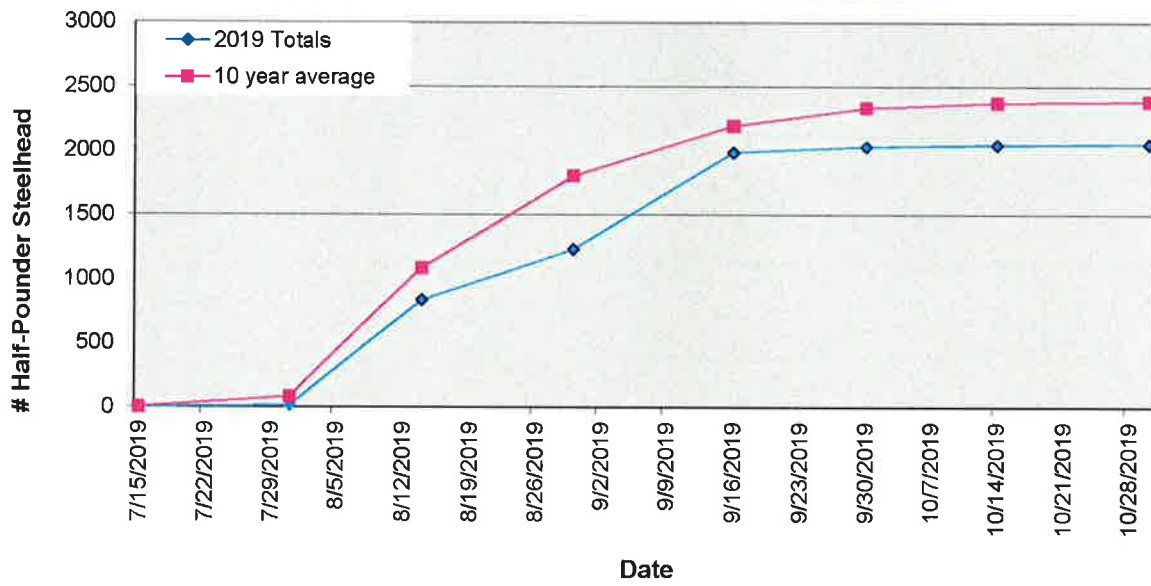
2018 Half-Pounder Steelhead Daily Totals - Seined at Huntley Park
(River Mile 8)



Steelhead Half-Pounders

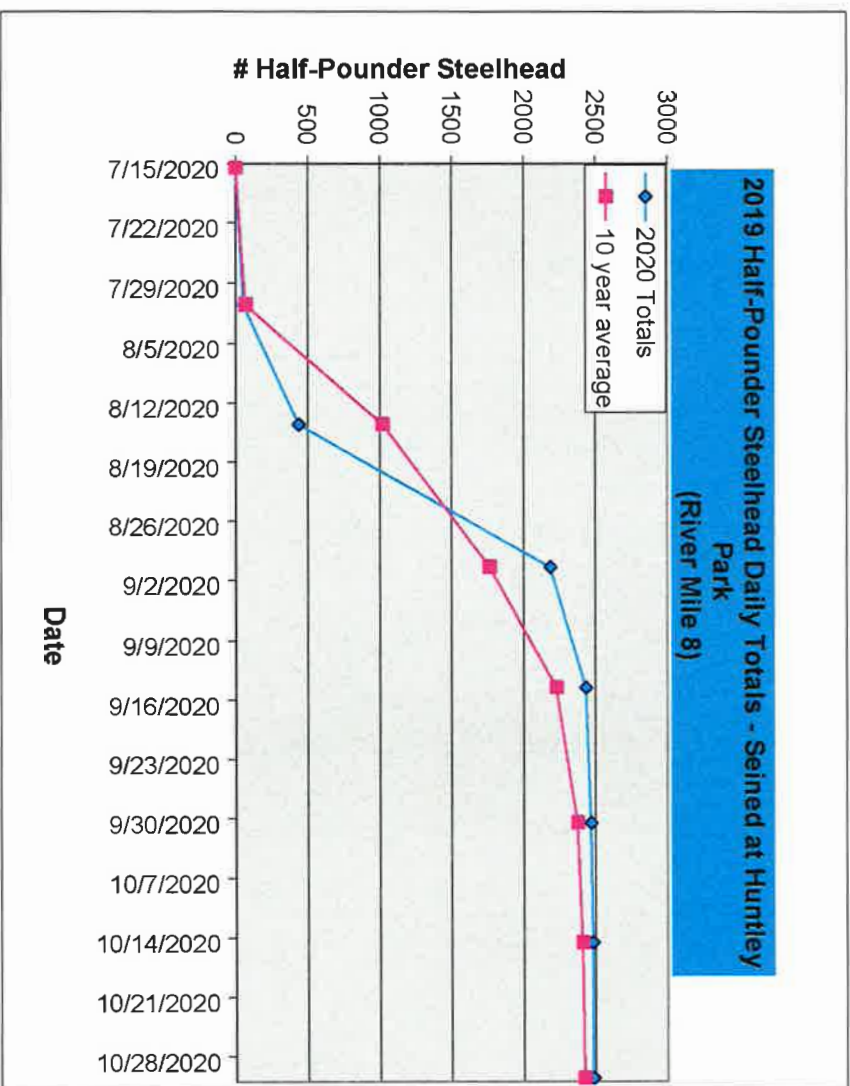
Date	Wild	Hatchery	Daily	2 week	Cumulative	10 year
			Catch	Cumulative	Total	Average
7/15/2019	0	0	0	0	0	0
7/17/2019	0	0	0		0	
7/19/2019	0	0	0		0	
7/22/2019	1	1	2		2	
7/24/2019	0	1	1		3	
7/26/2019	0	0	0		3	
7/29/2019	1	2	3		6	
7/31/2019	3	0	3	9	9	80
8/2/2019	5	1	6		15	
8/5/2019	8	6	14		29	
8/7/2019	32	61	93		122	
8/9/2019	23	38	61		183	
8/12/2019	74	271	345		528	
8/14/2019	51	161	212		740	
8/16/2019	35	60	95	835	835	1085
8/19/2019	5	46	51		886	
8/21/2019	62	154	216		1102	
8/23/2019	9	18	27		1129	
8/26/2019	10	36	46		1175	
8/28/2019	10	24	34		1209	
8/30/2019	9	14	23	1232	1232	1804
9/3/2019	19	41	60		1292	
9/4/2019	22	70	92		1384	
9/6/2016	41	168	209		1593	
9/9/2019	37	148	185		1778	
9/11/2019	26	92	118		1896	
9/13/2019	13	66	79		1975	
9/16/2019	4	8	12	1987	1987	2193
9/18/2019	2	13	15		2002	
9/20/2019	5	5	10		2012	
9/23/2019	2	7	9		2021	
9/25/2019	3	10	13		2034	
9/27/2019	0	0	0		2034	
9/30/2019	0	0	0	2034	2034	2338
10/2/2019	0	6	6		2040	
10/4/2019	0	0	0		2040	
10/7/2019	0	0	0		2040	
10/9/2019	1	2	3		2043	
10/11/2019	0	0	0		2043	
10/14/2019	0	2	2	2045	2045	2372
10/16/2019	0	4	4		2049	
10/18/2019	0	1	1		2050	
10/21/2019	0	0	0		2050	
10/23/2019	0	2	2		2052	
10/25/2019	0	0	0		2052	
10/28/2019	0	0	0		2052	
10/30/2019	0	1	1	2053	2053	2385

**2019 Half-Pounder Steelhead Daily Totals - Seined at Huntley Park
(River Mile 8)**



Steelhead Half-Pounders

Date	Wild	Hatchery	Daily	2 week	Cumulative	10 year
			Catch	Cumulative	Total	Average
7/15/2020	0	0	0	0	0	0
7/17/2020	0	0	0		0	
7/20/2020	0	0	0		0	
7/22/2020	0	2	2		2	
7/24/2020	0	3	3		5	
7/27/2020	6	1	7		12	
7/29/2020	2	3	5		17	
7/31/2020	13	23	36	53	53	67
8/3/2020	9	7	16		69	
8/5/2020	31	53	84		153	
8/7/2020	7	20	27		180	
8/10/2020	0	0	0		180	
8/12/2020	89	87	176		356	
8/14/2020	25	58	83	439	439	1020
8/17/2020	78	165	243		682	
8/19/2020	47	122	169		851	
8/21/2020	96	233	329		1180	
8/24/2020	61	147	208		1388	
8/26/2020	76	217	293		1681	
8/28/2020	87	245	332		2013	
8/31/2020	40	133	173	2186	2186	1763
9/2/2020	12	75	87		2273	
9/4/2020	17	48	65		2338	
9/8/2020	9	40	49		2387	
9/9/2020	4	24	28		2415	
9/11/2020	1	5	6		2421	
9/14/2020	1	10	11	2432	2432	
9/16/2020	2	7	9		2441	2225
9/18/2020	3	1	4		2445	
9/21/2020	1	4	5		2450	
9/23/2020	0	6	6		2456	
9/25/2020	0	0	0		2456	
9/28/2020	4	5	9		2465	
9/30/2020	0	3	3	2468	2468	2373
10/2/2020	1	1	2		2470	
10/5/2020	0	2	2		2472	
10/7/2020	0	2	2		2474	
10/9/2020	1	2	3		2477	
10/12/2020	0	0	0		2477	
10/14/2020	0	1	1	2478	2478	2409
10/16/2020	1	0	1		2479	
10/19/2020	2	0	2		2481	
10/21/2020	1	0	1		2482	
10/23/2020	0	0	0		2482	
10/26/2020	0	0	0		2482	
10/28/2020	0	0	0		2482	
10/30/2020	0	0	0	2482	2482	2422

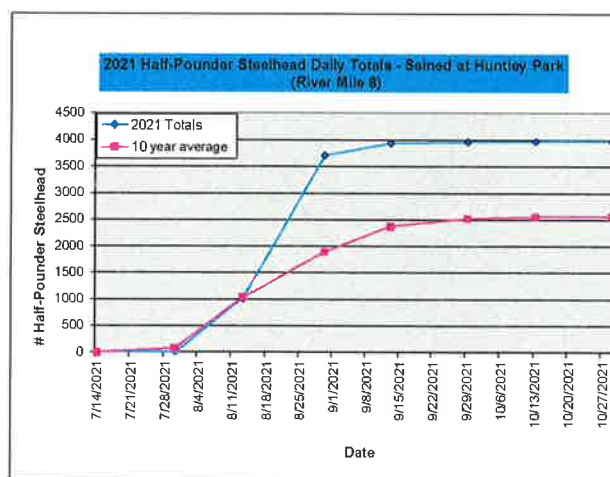


Steelhead Half-Pounders						
Date	Wild	Hatchery	Daily Catch	2 week Cumulative	Cumulative Total	10 year Average
7/14/2021			0	0	0	0
7/16/2021			0		0	
7/19/2021			0		0	
7/21/2021			0		0	
7/23/2021	0	0	0		0	
7/26/2021	1	1	2		2	
7/28/2021	0	0	0		2	
7/30/2021	2	0	2	4	4	72
8/2/2021	18	9	27		31	
8/4/2021	78	47	125		156	
8/6/2021	73	36	109		265	
8/9/2021	117	54	171		436	
8/11/2021	167	133	295		731	
8/13/2021	172	111	283	1014	1014	1035
8/16/2021	403	620	1023		2037	
8/18/2021	219	468	687		2724	
8/20/2021	88	147	235		2959	
8/23/2021	39	98	137		3096	
8/25/2021	114	298	412		3508	
8/27/2021	28	120	148		3656	
8/30/2021	13	42	55	3711	3711	1889
9/1/2021	7	17	24		3735	
9/3/2021	11	48	59		3794	
9/7/2021	2	23	25		3819	
9/8/2021	21	42	63		3882	
9/10/2021	10	30	40		3922	
9/13/2021	0	6	6		3928	
9/15/2021	4	5	9	3937	3937	2369
9/17/2021	0	1	1		3938	
9/20/2021	0	3	3		3941	
9/22/2021	5	4	9		3950	
9/24/2021	4	6	10		3960	
9/27/2021	2	5	7		3967	
9/29/2021	0	0	0	3967	3967	2519
10/1/2021	0	5	5		3972	
10/4/2021	0	1	1		3973	
10/6/2021	0	2	2		3975	
10/8/2021	0	0	0		3975	
10/11/2021	0	0	0		3975	
10/13/2021	0	0	0		3975	
10/15/2021	0	0	0	3975	3975	2555
10/18/2021	0	0	0		3975	
10/20/2021	0	0	0		3975	
10/22/2021	0	1	1		3976	
10/25/2021			0		3976	
10/27/2021			0		3976	
10/29/2021			0	3976	3976	2569

no seining high flows

no seining high flows

no seining high flows



ROGUE–SOUTH COAST MULTI-SPECIES CONSERVATION AND MANAGEMENT PLAN (RSP)

OREGON DEPARTMENT OF FISH AND WILDLIFE

**Commission Draft – Executive Summary
October 2021**

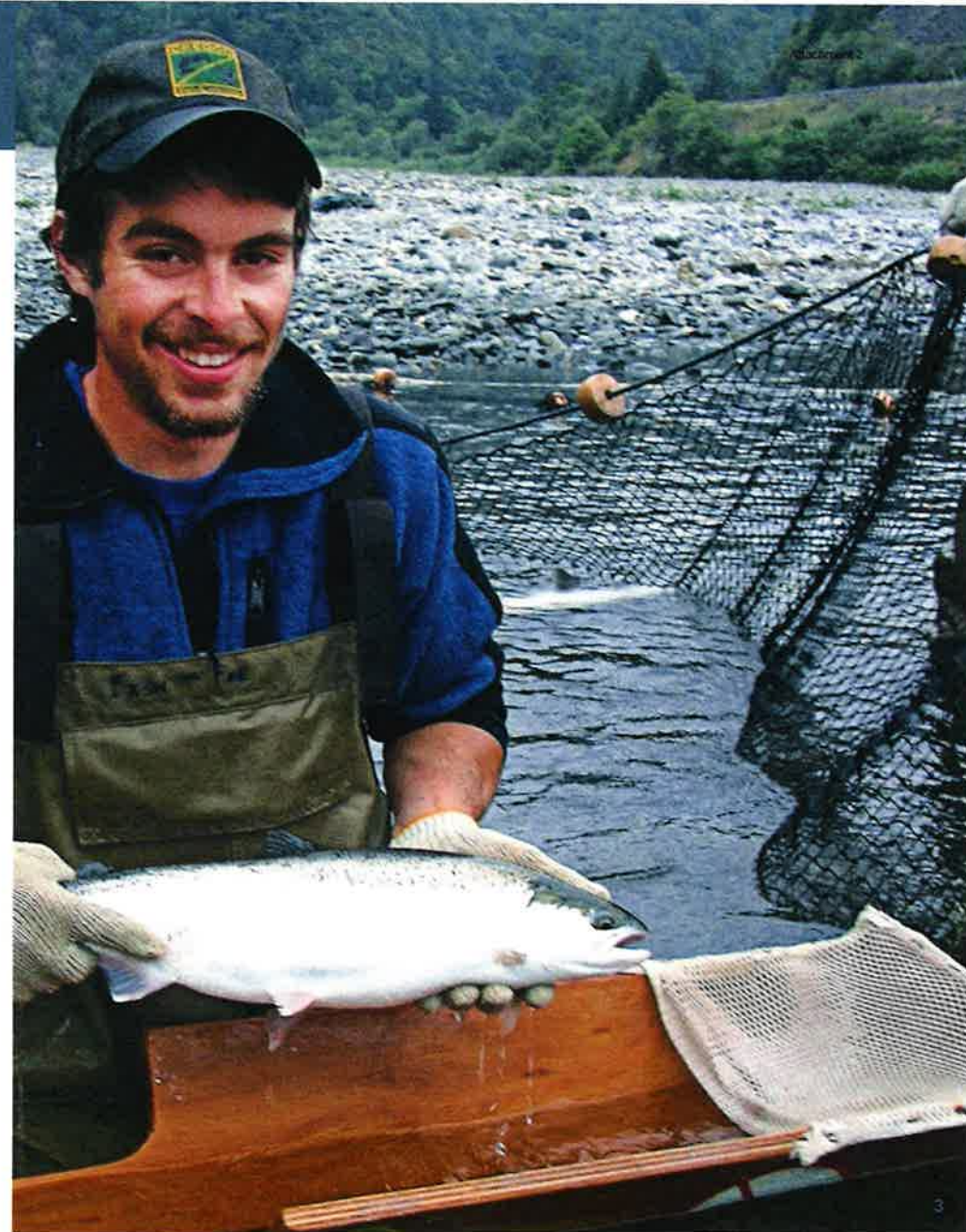


ODFW MISSION

To protect and enhance Oregon's fish and wildlife and their habitats
for use and enjoyment by present and future generations

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RSP SYNOPSIS



Goals

- Ensure long-term sustainability of wild steelhead, coho salmon, and cutthroat trout to provide ecological, economic, and cultural benefits for present and future generations.
- Foster and sustain fishing opportunities while conserving wild steelhead, coho salmon, and cutthroat trout.



Key Conclusions

- Wild winter steelhead and coastal cutthroat trout are widespread, abundant, and are expected to persist through time.
- Wild summer steelhead populations are sensitive due to development pressure in areas of key spawning and early rearing habitat and less widespread distribution, and require a cautious management approach.
- Coho salmon need status improvement to ensure future persistence.
- Climate and ocean change pose a risk to the long-term persistence of plan species. The degree of risk varies among plan species and locations.
- Desired status for all species is to increase abundance relative to recent levels, which would reduce risks to long-term persistence, increase resilience to climate change, and ensure strong, consistent fisheries.
- Primary limiting factors for all plan populations relate to habitat — particularly stream temperature, flow, and passage barriers (dams, culverts, etc.).
- Addressing habitat limiting factors will increase population resilience and reduce risk from climate and ocean change.



Key Outcomes

- Climate change is addressed in numerous strategies and actions.
- Support for prioritized and effective habitat protection and restoration efforts.
- Increase monitoring to guide management.
- Maintain and enhance fishing opportunities while minimizing risk from harvest, hatchery programs and climate change.
- Increase management surety through identification of locations, targets, and limits for hatchery programs.
- Implement a harvest management framework based on additional monitoring and data for wild winter steelhead.
- Strengthen public outreach and engagement in native fish conservation.

Attachment 2

ACRONYMS

NFCP: ODFW Native Fish Conservation Policy

NMFS: National Marine Fisheries Service

ODFW: Oregon Department of Fish and Wildlife

OFWC: Oregon Fish and Wildlife Commission

PHOS: percentage of hatchery fish on spawning grounds

RSP: Rogue-South Coast Multi-Species Conservation and Management Plan

SMU: Species Management Unit

VSP: Viable Salmonid Population



INTRODUCTION

The draft RSP is developed under guidance of ODFW's Native Fish Conservation Policy (NFCP).

The NFCP seeks to:

- Prevent serious depletion of any native fish species.
- Maintain and restore native fish.
- Foster and sustain fishing opportunities.

Read more about the NFCP [here](#).

The draft RSP addresses conservation and management of winter and summer steelhead, coho salmon, and cutthroat trout populations on the Oregon coast from Cape Blanco south to the California border.

ODFW groups native fish populations into species management units (SMUs) for conservation and management purposes. An SMU is a collection of populations from a common geographic region that share similar genetic and ecological characteristics.

Of the SMUs covered in the draft RSP, only coho salmon are listed under the federal Endangered Species Act and require status improvement to ensure viability. For the other SMUs, management is directed toward increasing societal benefits (including robust fisheries) and reducing long-term conservation risk.

The figure on the following page outlines the planning process used to develop the draft RSP, and additional steps that will occur prior to plan adoption by the Oregon Fish and Wildlife Commission.

Note: Spring and Fall Chinook Salmon SMUs in the area covered by the draft RSP have separate conservation plans. These plans can be found [here](#).

Conservation: managing for sustainability of native fish so present and future generations may enjoy their ecological, economic, recreational, and aesthetic benefits.

— Native Fish Conservation Policy (NFCP)



PLANNING PROCESS TIMELINE

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SPECIES AND POPULATIONS COVERED BY THE PLAN

Map of the watersheds and fish populations covered by the RSP. Populations are grouped in two strata — Coastal and Rogue. Important differences between the two strata are described in the plan.

Steelhead (*Oncorhynchus mykiss*)

Rogue-South Coast Winter Steelhead SMU
Rogue Summer Steelhead SMU



Coho Salmon (*Oncorhynchus kisutch*)

Rogue-South Coast Coho Salmon SMU



Coastal Cutthroat Trout (*Oncorhynchus clarkii*)

Rogue-South Coast Cutthroat Trout SMU





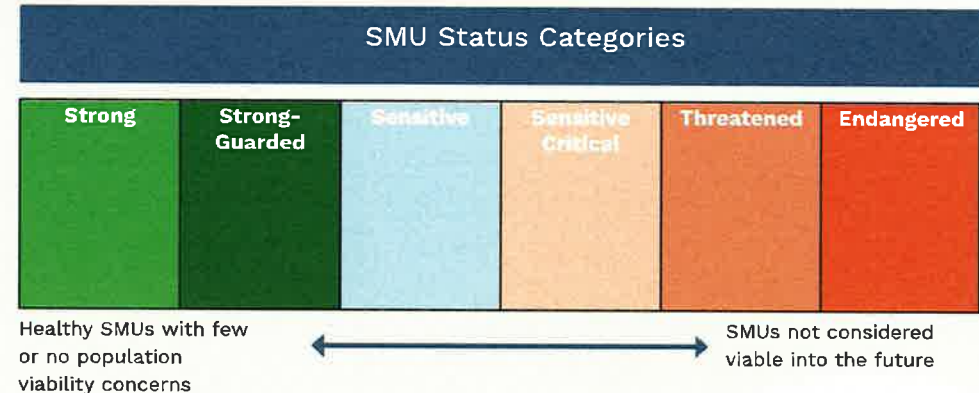
CURRENT STATUS

Assessing the current status of plan species is one of the foundations of plan development.

Current status was determined by:

1. Assessing populations and strata based on Viable Salmonid Population (VSP) parameters:
 - Abundance.
 - Productivity.
 - Spatial structure.
 - Diversity.
2. Determining a viability risk score for each population and stratum, "Viability" is the ability to persist through time.
3. Determining SMU status based on:
 - Population and stratum viability risk scores.
 - Confidence in the assessment results.
 - Other risk factors.

SMUs were assigned to one of the following status categories:



Current Status Assessment Results

Rogue-South Coast WINTER STEELHEAD	Strong-Guarded
Rogue-South Coast CUTTHROAT TROUT	Strong-Guarded
Rogue SUMMER STEELHEAD	Sensitive
Rogue-South Coast COHO SALMON	Sensitive-Critical



CLIMATE AND OCEAN CHANGE

- The Earth's climate and oceans are changing and these changes are expected to continue in coming decades.
- Oregon is already experiencing climate and ocean changes:
 - Increased average air and water temperatures.
 - Disrupted precipitation patterns and increasing drought frequency.
 - Increased ocean acidification and hypoxia.
- Following direction in ODFW's Climate and Ocean Change Policy, the draft RSP:
 - Assesses climate and ocean change risk for plan species.
 - Uses assessment results to inform management goals, strategies, and actions in the plan.

Climate and Ocean Change Projections

The following changes in freshwater and marine habitat are expected. There is uncertainty about the timing and extent of these changes, but all are likely to affect plan species in coming years.

Freshwater

- Higher water temperatures.
- Reduced summer streamflow and more stream drying.
- Increased winter precipitation and extreme storm events.

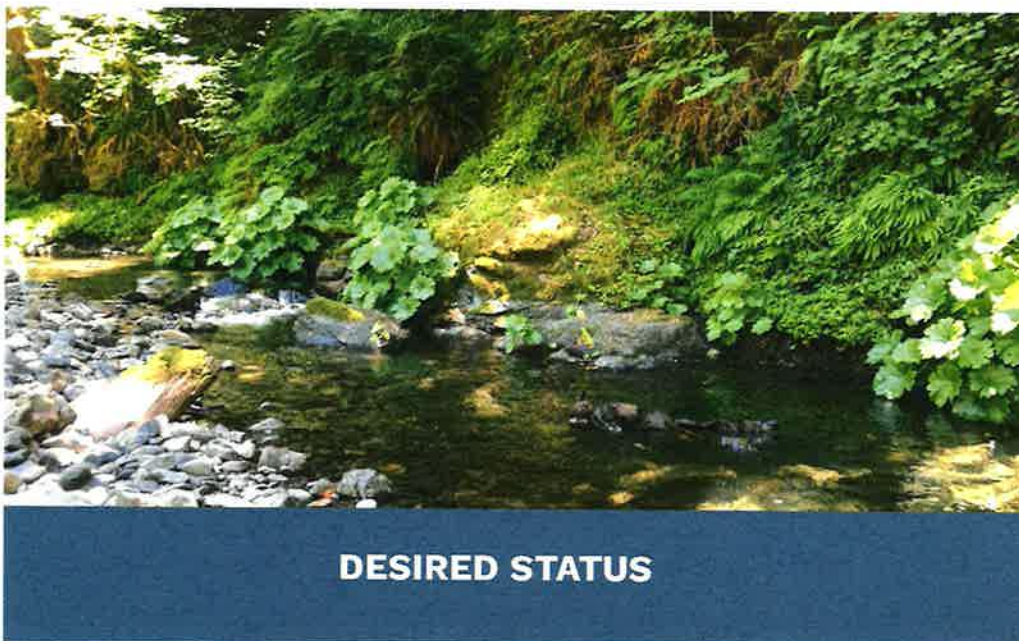
Ocean

- Higher ocean temperatures and more marine heat waves.
- Increased ocean acidification.
- Changes in the timing and magnitude of upwelling.
- Altered marine productivity and food webs.



Key Conclusions of the RSP Climate and Ocean Change Assessment

- Projections suggest that both freshwater and the ocean will become less suitable for salmonids during the next 80 years.
- Some locations in the planning area will experience less change than others.
- In many cases, projected changes due to climate change are smaller than impacts from past land use and development.
- Coho salmon are most at risk from climate and ocean change, followed by summer steelhead and winter steelhead. Cutthroat trout have the lowest risk.
- **Protecting, restoring, and enhancing key freshwater habitats is crucial to minimizing longer-term impacts of climate and ocean change.**
- Climate and ocean change assessment results were used to inform desired status goals for SMUs and develop management strategies and actions needed to achieve and maintain desired status.



- Native Fish Conservation Policy (NFCP) plans describe an SMU desired status that reflects the ecological, economic and cultural benefits to be sought from naturally produced fish.
- The RSP identifies categorical desired status for SMUs (see below) and numerical desired status thresholds for populations or strata.
- SMU desired status resulted from considering both current status and climate change risk. Climate change risk is also an indicator of the “urgency” for actions to make the SMU more resilient to expected climate and ocean changes.
- All population or strata-level desired status thresholds are set higher than current levels to restore populations at risk and improve populations that are not at risk.
- Achieving desired status for populations, strata, and SMUs will reduce viability risk, increase resilience to climate change, and ensure strong, consistent fisheries.



In the summaries that follow, even if current status and desired status are the same for an SMU, increased abundance in all of the SMU's populations is called for in order to provide additional societal benefits, including more fishing opportunity.

Rogue–South Coast WINTER STEELHEAD	Current Status	Strong-Guarded
	Climate Change Risk	Moderate
	Desired Status	Strong-Guarded

Rogue–South Coast CUTTHROAT TROUT	Current Status	Strong-Guarded
	Climate Change Risk	Low
	Desired Status	Strong-Guarded

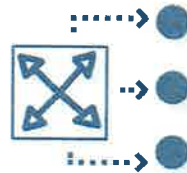
Rogue SUMMER STEELHEAD	Current Status	Sensitive
	Climate Change Risk	Moderate
	Desired Status	Sensitive

Rogue–South Coast COHO SALMON	Current Status	Sensitive-Critical
	Climate Change Risk	Moderate to High
	Desired Status	Sensitive



LIMITING FACTORS

Limiting factors are conditions causing or contributing to a “gap” between current status and desired status for a population or SMU. Identifying limiting factors helps determine and prioritize management strategies and actions needed to achieve desired status (which includes improved fishing opportunity).



Limiting factors are identified in six categories:

Direct Management

Hatchery fish predation and/or competition are possible limiting factors for populations in the Middle Rogue/Applegate, Upper Rogue, and Elk River. Under current angling regulations in the region, fishing was not identified as a limiting factor for any SMU.

Other Species

Predation by pinnipeds and birds occurs across all SMUs but isn't considered a primary or secondary limiting factor. Non-native fish competition and/or predation are considered secondary or possible limiting factors in several population areas where non-native minnows are established.

Habitat Access

Barriers to upstream passage and impacts from downstream passage and unscreened diversions are primary limiting factors for Middle Rogue/Applegate and Upper Rogue populations, and possible limiting factors for Illinois populations. Reduced access to natural off-channel habitat is a secondary limiting factor for most populations.

Water Quality

High stream temperatures during summer are a primary or secondary limiting factor for all populations. Sedimentation and poor estuary water quality are secondary or possible limiting factors in some populations. Toxic pollutants are a possible limiting factor for coho salmon in the urbanized Bear Creek watershed.

Water Quantity

Low flows during summer and early fall are a primary limiting factor for all populations. Flashy/high flows during winter are a possible limiting factor for most populations.

Instream Physical Habitat

A lack of habitat structure within stream channels is a primary limiting factor for the Elk River coho salmon population and a possible limiting factor for all populations in the Rogue stratum.





MANAGEMENT STRATEGIES AND ACTIONS

To address limiting factors and achieve desired status, ODFW worked with stakeholders and other plan development partners to identify management strategies and actions in seven categories:



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HABITAT

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Habitat is the foundation for conservation and fishing opportunity. Protecting habitat, especially high quality habitat, and restoring degraded habitat benefit both of these interests.

There are important differences in habitat protection and restoration needs for watersheds in the interior Rogue basin compared to other coastal watersheds covered by the plan.

Focusing habitat protection and restoration resources on the right actions in the right places at the right scale is the key to achieving desired status and reducing risk from climate and ocean change.

Strategies

- Promote and implement a tiered approach to habitat restoration efforts and funding to achieve maximum benefit for plan species. Prioritize restoration actions in the following order: 1) actions to address primary limiting factors in population areas with an independent coho salmon population; 2) actions to address primary limiting factors in other population areas; and 3) actions to address secondary limiting factors for all population areas.
- Within the Rogue and Coastal stratas, identify watersheds that will be key to supporting plan populations in the future, and focus habitat protection and restoration activities towards these watersheds.
- Consistent with ODFW's mission, policies, and laws, continue to coordinate with and advise other agencies, local governments, and regulatory entities to ensure that habitat protection processes and actions provide the best possible outcomes for native fish.
- Exhibit leadership in coordinating the implementation of actions to adapt to climate change.
- Encourage citizen involvement to help implement habitat protection and restoration actions.
- Promote beavers and beaver-related pond habitat to increase water quantity and stream complexity, primarily through riparian restoration and helping landowners learn to live with beaver impacts.



Key Actions

Habitat Access

In addition to removing priority barriers and installing fish screens at unscreened diversions:

- Report barrier-impacted stream miles and associated loss in fish production; document improvements during plan implementation.
- Work with partners to develop outreach materials and training on proper culvert sizing and construction for installers and the general public.
- Remove barriers to improve linear connectivity in small valley bottom streams where development constrains floodplain use or cost limits floodplain restoration opportunity.
- Work with community members to install and maintain temporary structures at barriers in urban areas, while working toward permanent passage improvements in the long-term.



Many of the actions listed above address multiple limiting factors. A full list of actions can be found in Table 10 of the plan, including important details and projects of interest. The combination of strategies and actions in the plan is a strong approach to addressing primary limiting factors, and a changing climate whose primary effect is to make these factors more severe for Oregon's native fish populations. Readers are encouraged to read the full list.

Water Quality and Quantity

In addition to working with partner organizations to purchase or temporarily lease water rights from willing sellers:

- Work with restoration practitioners to increase the scope and efficacy of riparian restoration. Prioritize streams where intact riparian habitat from forested reaches can continue down toward the valley bottom.
- Promote riparian protection through coordination with regulatory authorities to foster shade and future large woody debris for instream structure and floodplain connectivity.
- Promote beavers and beaver-related pond habitat to increase instream habitat; initiate beaver emphasis areas in targeted subbasins.
- Encourage citizens to become involved in all aspects of water conservation.
- Work with partners to identify and map cold-water refuges to help prioritize protection and restoration.
- Work with partners to implement pilot projects to increase streamflow and cool water input.

Instream Physical Habitat

- Continue and strengthen outreach on the importance of riparian vegetation to foster shade as well as future large woody debris for instream structure and floodplain connectivity.
- Implement actions to increase habitat structure/complexity identified in coho salmon strategic action plans (SAPs).

OTHER SPECIES

Attachment 2

Steelhead, coho salmon, and cutthroat trout interact with other species in many ways. Interactions such as predation, competition, and food availability can potentially affect population status.

Competition and predation by non-native minnows (pikeminnow and redbelly shiners) are the only interactions with other species currently thought to be a limiting factor or potential limiting factor. Impacts from these non-native fish are strongly influenced by stream temperature, a synergy that could increase their impact in a warming climate.

Pinniped (seals and sea lions) and avian (fish-eating birds) predation is a source of mortality for all RSP species, but currently isn't a primary or secondary limiting factor for any population. The plan identifies research and monitoring actions to learn more about predation impacts and how they may change over time.

Predation impacts both the fishing experience and Oregon's investment in hatchery resources regardless of whether there are conservation impacts. The draft RSP supports the ongoing, successful program to reduce conflict between pinnipeds and anglers in the Rogue Bay and identifies additional actions to increase the program's effectiveness.

Strategies

- Provide support for programs that reduce conflict between predators and anglers.
- Assess predator impacts and feasibility of management options with an over-arching science approach across predators.
- Implement a strategic approach to reducing impacts from non-native minnows, with a focus on water quality to favor salmon and steelhead. Remove non-native minnows where possible to reduce impacts on native fish.
- Prohibit the introduction of non-native fin fish species into flowing waters, and develop and support programs designed to decrease illegal introductions of non-native species.



Key Actions

- Continue three-pronged approach to reduce pinniped-angler interaction in the Rogue Bay.
- Maintain pinniped research and monitoring; expand sampling to address uncertainties.
- Continue local (lower Rogue River and estuary) and coastwide avian predation monitoring.
- Remove fish passage barriers to reduce avian predation.
- Protect and restore riparian habitat to help keep streams cool.
- Survey the distribution and abundance of non-native fish.
- Encourage pikeminnow removal in the Rogue River by angling and explore feasibility of non-native fish removal using other techniques.

HATCHERIES

Hatchery fish are a very important component of fisheries, but interactions with hatchery fish can present a risk to wild fish through genetic interaction, competition, predation, and predator attraction.

Risk from hatchery programs is very low in the plan area and can be managed successfully to ensure hatchery programs don't negatively impact wild populations and continue to meet fishery augmentation or mitigation goals.

Most hatchery production (80 percent) in the RSP planning area is mitigation for wild production lost from construction of federal dams in the Rogue basin.

Strategies

- Manage hatchery programs to provide optimal harvest opportunities and meet mitigation goals while being consistent with desired status targets for wild populations.
- Manage hatchery programs to minimize risk to the long-term adaptive capacity of wild populations.
- Manage for wild fish emphasis or mixed emphasis in the appropriate Management Areas and obtain OFWC approval for starting new or eliminating existing hatchery programs in a Management Area relative to those in Table 13 of the RSP.

Key Actions

- Designate "Mixed Emphasis Areas" and "Wild Fish Emphasis Areas" to indicate where hatchery fish can and cannot be released. (see plan for details).
- Establish smolt release targets and limits for the percentage of hatchery fish on the spawning grounds (pHOS) in a population.
- Minimize risk from Rogue mitigation programs by promoting angler harvest of hatchery steelhead.
- Create a new acclimation site for the Chetco winter steelhead program.
- Create a new winter steelhead acclimation site at Jumpoff Joe Creek in the Middle Rogue.
- Increase Rogue coho salmon hatchery production by 25,000 smolts to improve fishing and support coho salmon monitoring.

Current and Proposed Steelhead and Coho Salmon Hatchery Programs

	<u>Number of smolts stocked</u>			<u>Management Areas with Releases</u>	
	Current	Proposed	%Change	Current	Proposed
Coastal Salmon					
Winter Steelhead	50,000	50,000*	0%	1	1
Rogue Stratum					
Winter Steelhead	313,000	313,000	0%	3	3
Summer Steelhead	220,000	220,000	0%	2	2
Coho Salmon	75,000	100,000	+33%	1	2
Total	608,000	633,000	+4%	3	3

* Release target may increase in the future if program remains within limits established in the plan.

FISHING

Attachment 2

Angling regulations for wild steelhead, coho salmon, and cutthroat trout in RSP basins have changed significantly in the last 30 years, increasing protections for wild fish, addressing social concerns, and maintaining limited wild cutthroat and winter steelhead harvest opportunity.

Fishing actions identified in this plan build on that framework to address social and biological concerns to ensure the long-term conservation of each SMU.

Actions are intended to add to current proactive management in the face of climate change, consistent with ODFW's Climate and Ocean Change Policy.

Geography and remoteness of the Coastal Stratum of the RSP planning area has provided additional protection and limited angling opportunity to the majority of winter steelhead distribution open to angling.

Strategies

- Manage recreational fisheries to provide harvest and angling opportunities consistent with conservation of naturally produced steelhead, coho salmon and cutthroat trout, and achievement of desired status goals for each SMU.
- Manage fisheries proactively for the future and respond to changing environmental conditions.
- Collect appropriate data to manage wild fisheries.



Key Actions

Winter Steelhead

Implement a new Wild Winter Steelhead Angling Framework that meets the following criteria:

- Improves data on steelhead harvest through mandatory reporting
- Establishes a season structure for the winter steelhead fishery
- Tracks overall participation in the fishery, including catch and release angling
- Improves management through increased monitoring
- Establishes harvest rate limits for each population
- Responds to variable and poor returns due to ocean and freshwater conditions (i.e., climate and ocean change)
- Provides a balanced angling opportunity that takes into consideration social concerns

To meet these criteria, the Wild Winter Steelhead Angling Framework has several components:

1. NEW AUTHORIZATIONS

Two new authorizations (Rogue–South Coast Steelhead Validation and Rogue–South Coast Wild Steelhead Harvest Card) will allow overall fishery participation to be tracked, facilitate the collection of comprehensive harvest data, and generate funds for winter steelhead monitoring. Authorizations will be issued by winter steelhead return year (December–April).

2. NEW CONTROLS

Harvest rate limits for populations with wild steelhead harvest opportunity.

ODFW will track harvest rates using new adult monitoring and improved harvest data.

Conservation thresholds that trigger changes in regulations to protect spawners when returns are expected to be low. **Forecasting and conservation status thresholds are based on ongoing monitoring and will allow proactive, stratum-specific action to reduce harvest impacts.**

Adjust regulations with environmental and social conditions. **Additional within-basin regulations to address site-specific environmental conditions, angling practices, and other unanticipated situations can be implemented.**

3. FIVE-YEAR REVIEW

Interim winter steelhead harvest regulations (see next item) will be implemented for five years following plan adoption.

ODFW will initiate new winter steelhead population monitoring and harvest monitoring during this period.

After five years of plan implementation, ODFW will review monitoring results and revise angling regulations as needed to ensure consistency with harvest rate limits in the plan.

4. INTERIM HARVEST REGULATIONS

Proposed regulations maintain existing interim bag limits and set up a new season structure for winter steelhead fisheries.

Summer Steelhead

- Continue to prohibit harvest of wild summer steelhead.
- Consider limited wild harvest opportunity in the future if abundance increases and threats are reduced.

Coho Salmon

- Continue to prohibit harvest of wild coho salmon.
- Work with NOAA to consider limited wild harvest opportunity in the Rogue Basin in the future when conditions merit.

Cutthroat Trout

- Maintain current regulations that provide harvest opportunity in the Coastal Stratum and extra protection for juvenile steelhead in the Rogue Stratum.



RESEARCH AND MONITORING

Monitoring is intended to meet four primary needs:

- Provide information needed for harvest and hatchery management decisions.
- Track status of plan species based on specific, measurable criteria (see Appendix V – Desired Status Metrics and Goals).
- Document changing climate and ocean conditions and resulting impacts on plan species.
- Gauge the success of management strategies to address limiting factors.

The following types of monitoring are proposed in the plan: some are currently occurring, and others are new. Monitoring methods vary among species and populations based on data needs.

MONITORING TYPE (OLIVE = NEW)		WHICH SPECIES WILL BE MONITORED?	WHAT METRICS WILL BE MONITORED?
	Spawning surveys	Winter steelhead Summer steelhead Coho salmon	Abundance
	Adult count stations Huntley Park seining Adult traps Sonar (see plan for details)	Winter steelhead Summer steelhead Half-pounder steelhead Coho salmon	Abundance
	Fishery monitoring Electronic Licensing Systems (ELS) Steelhead fishing authorization Creel surveys	Winter steelhead	Harvest Fishing effort
	Snorkel surveys	Winter steelhead Coho salmon Cutthroat trout	Juvenile abundance Distribution
	Habitat monitoring	All	Physical habitat Temperature Flow

Research actions identified in the draft RSP address the following needs:

Attachment 2

- Reduce key uncertainties that limit ODFW's ability to assess status or management strategy effectiveness
- Reduce key uncertainties in how plan species and their habitats respond to climate and ocean change
- Investigate emerging monitoring techniques that can provide new or improved information compared to traditional methods

OUTREACH/ENFORCEMENT

- Outreach is a critical component of RSP implementation.
- Outreach will be used to communicate plan outcomes as well as involve other entities and the public in actions that will have a real benefit to native fish and fisheries.
- Involve ODFW STEP volunteers and other partners in implementing monitoring, restoration, hatchery programs, and angler education.

Strategies

- Encourage angler stewardship to reduce impacts without adding layers of regulation, and increase cooperation with Oregon State Police (OSP) to help enforce existing regulations.
- Increase and diversify public participation in fishing and native fish conservation.
- Improve communication with the public; provide more information through more diverse avenues of communication and collect information to inform management.
- Encourage citizen involvement to help implement habitat protection and restoration actions, and encourage landowner participation in these critical actions.

Outreach/Enforcement Topics In The Plan

- Promoting angler stewardship through informational outreach.
- Distributing fish management information to the public.
- Promoting diversity in native fish conservation and fishing.
- Improving data collection from ODFW's Electronic Licensing System.
- Enlisting public help with enforcement.
- Developing enforcement expectations and targets.
- Habitat protection and restoration outreach.
- Plan implementation reporting.



FACILITIES



Facilities actions are primarily intended to foster and sustain fishing opportunity consistent with ODFW's mission and the Native Fish Conservation Policy.

- In this plan, facilities include infrastructure such as hatcheries and boat ramps, and sites that may have little or no development but provide access to fisheries.
- Many actions require partnerships with other agencies or entities to implement, and most will require additional funding.

Strategies

- Invest in infrastructure that best supports ODFW's mission.
- Develop and maintain public access to increase fishing opportunity and improve angler experience.

Key Actions

- Upgrade Rogue mitigation hatchery infrastructure.
- Improve several existing access sites and boat ramps.
- Maintain and improve bank fishing access.
- Pursue opportunities to establish new access sites for the public.

PLAN IMPLEMENTATION

Attachment 2

Monitoring is key to successfully implementing the RSP. Ongoing and new monitoring will:

- Inform management decisions.
- Provide data for future status assessments.
- Allow for adaptive management of wild and hatchery fish.
- Determine if management goals (e.g. harvest and PHOS limits) are being met.
- Measure progress in maintaining or achieving desired status.

Monitoring results will be reported yearly and will help inform future plan assessments, which will occur every 12 years. Post-plan returns will begin around 2025.

Implementation costs:

- ODFW's base budget supports most RSP implementation, excluding habitat restoration and protection actions, many of which will require external coordination and funding.
- New funding sources for one-time or annual costs are also needed for some Hatchery, Research and Monitoring, Outreach/Enforcement, and Facilities actions.

How Will The Plan Be Used? The RSP will:

- Inform local management decisions.
- Inform adaptive management to meet plan goals.
- Inform ODFW's budget process.
- Provide guidance to other agencies and organizations conducting habitat restoration and protection on public and private lands.
- Guide project prioritization to improve wild fish conservation and fishing opportunities.
- Provide comprehensive information and assurances on fish management direction.

ODFW will report annually on RSP implementation and conduct a comprehensive status assessment in 12 years. This assessment will determine if the status of any of the four SMUs has changed and if additional or modified actions are needed to meet RSP goals.

Outlook

The desired status for each species is ambitious, especially given climate and ocean change projections. Achieving desired status will require improvements in habitat, proper stewardship in the management of fisheries and hatchery programs, and hard work to address other risks the fish face. It will require cooperation and dedication from all parties interested in salmon, steelhead and trout to reach these goals.

Fortunately, there is a long track record of citizens in Oregon, and the Rogue-South Coast area in particular, working together to restore fish and their habitats. If this can be maintained and increased, the ambitious goals in this plan can be achieved, and Oregonians for many generations can benefit from all that healthy salmon, steelhead, and trout populations provide.

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Curry County Fisheries Nov. 2021



Steelhead and Coho Salmon Runs using Huntley Park Seining Data and Gold Ray Dam Counts.

“Without evidence of population decline harvest should not be restrictive”.

Gold Ray Dam Winter Steelhead Counts

Gold Ray Dam counting Station near Medford 1942 – 2010 when Dam was removed. Counts gave a trend of populations for the Rogue River and South Coast streams.

Years	Yearly Average	
1942 – 2010 (68 years)	10,039	
2000 – 2010 (11 years)	14,948	49.5% increase
2015 to 2021 (7 years)	309 Yearly Average 247 historic Average (see Huntley Park Data)	24% increase

½ Pounder Counts Using ODFW Huntley Park Seine Data

ODFW contends ½ # Steelhead returns at Huntley Park forecast
Winter Steelhead Returns the following year.

Year	Huntley Count Seining	10 year average %
2015	1754	1519 – up 15%
2016	2013	1621 – up 24%
2017	3382	1753 – up 85%
2018	5228	2045 – up 165%
2019	2053 Still 30% above 2015 10 year average	2385 Down less than 1%
2020	2482	2422 – up 2.5%
2021	3976	2564 - up 60%

Gold Ray Dam

Summer Adult Steelhead Counts

Release of all Wild Summer Steelhead including ½ pounders has been in effect for approx. 2 decades.

Years	Average Yearly Count	Percentage of 68 year average
1942 - 2010	7,340	
2000 - 2010	13,127	79% increase
2015 - 2021	Huntley Park Seine Count	Up 24%

Summer Steelhead Adult Return Huntley Park Seining

2015 – 2021 average 306 / Historical Avg. 247 – Up 24%

Year	Huntley Seining Count	10 Year Average %
2015	181	225 – down 19.5%
2016	261	226 – up 15%
2017	244	221 – up 10.5%
2018	563	223 – up 152%
2019	324	269 – up 21%
2020	184	281 – down 35%
2021	390	287 – up 36%

Conclusions

- Using Huntley Park and Historic Counts at Gold Ray Dam there can be no conclusion of declines in Rogue River Steelhead populations.
- ODFW uses Rogue fisheries data to estimate South Coast returns as well as other smaller streams.
- The Rogue Data from Gold Ray and Huntley Park shows population trends. The population trends are up not down.
- During Stakeholder meetings ODFW was asked to include the Gold Ray historic Data showing concrete population metrics but did they not do so. They did say they would consider the data in the future.
- ODFW staff showed a Bias and the Commission is following that Bias. The proof of Bias includes not including Zone Regulation of 2 and 10 harvest on healthy Wild Steelhead runs.
- ODFW Staff did include a Biased zero harvest of Wild Steelhead as a harvest option.
- Without evidence of population decline harvest should not be restrictive.

KINGSLEY Lisa M * ODFW

From: Don DeZurik <dezurikd@gmail.com>
Sent: Saturday, November 27, 2021 5:05 AM
To: COMMISSION ODFW * ODFW
Subject: Catch and Release for Wild Steelhead in Southern Oregon

Dear Chair Wahl and ODFW Commission,

I am from WI. I have fished for Steelhead in OR 6 times. I favor NO HARVEST of wild steelhead. Catch & Release only.

Sincerely,

Don DeZurik

dezurikd@gmail.com 54961

KINGSLEY Lisa M * ODFW

From: George Lowe <dicklowe88@gmail.com>
Sent: Saturday, November 27, 2021 9:52 AM
To: COMMISSION ODFW * ODFW
Subject: Please maintain harvest of wild winter steelhead in SW Oregon streams

Sport fishing , wild Steelhead is very important to anglers, we support conservation and habitat restoration.
This is part of our culture.

Thank you
George Lowe
91454 hwy 42
Coquille, Oregon

KINGSLEY Lisa M * ODFW

From: Michael Drais <okiedokie33@gmail.com>
Sent: Saturday, November 27, 2021 11:33 AM
To: COMMISSION ODFW * ODFW
Subject: Catch and Release for Wild Steelhead in Southern Oregon

Dear Chair Wahl and ODFW Commission,

Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species Conservation Management Plan (RSP).

I do not share the views of the Native Fish Society, in particular it's agenda of trying to eliminate hatchery supplementation of salmon and steelhead stocks based on "cherry picked" and misleading data.

In response to the public draft of the RSP published in July, over 2,260 people asked the department to implement catch and release regulations. That is because an organized group of people, many of whom are not Oregon residents and have no direct interest in fishing in this state, have decided on principal that they do not want any retention of "wild spawning" steelhead.

By far the MAJORITY of anglers in Oregon wish to retain our historic ability to harvest and retain salmon and steelhead where feasible. The vast majority of fisher people in this state wish to increase hatchery production, consistent with modern hatchery protocol, wherever feasible in our state. The minority, activist groups sponsoring non-retention of wild steelhead and reduction of hatchery production ARE NOT REPRESENTATIVE OF THE SPORTFISHING POPULATION IN OREGON.

I concur with the current RSP providing a suite of actions that increase hatchery expansion throughout the Rogue and south coast.

I request that the department ENDORSE THE PROPOSED hatchery expansion in the RSP.

Thank you for the opportunity to provide comments on the Commission Draft of the RSP. I ask the Department to continue to provide the opportunity for catch and RETENTION angling for wild winter steelhead on the Rogue and south coast watersheds and harvest in the interim on hatchery origin stocks.

Sincerely,
Michael Drais
okiedokie33@gmail.com

KINGSLEY Lisa M * ODFW

From: Michael Drais <okiedokie33@gmail.com>
Sent: Saturday, November 27, 2021 11:34 AM
To: COMMISSION ODFW * ODFW
Subject: Catch and Release for Wild Steelhead in Southern Oregon

Dear Chair Wahl and ODFW Commission,

Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species Conservation Management Plan (RSP).

I do not share the views of the Native Fish Society, in particular it's agenda of trying to eliminate hatchery supplementation of salmon and steelhead stocks based on "cherry picked" and misleading data.

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Sincerely,
Michael Drais
okiedokie33@gmail.com

KINGSLEY Lisa M * ODFW

From: Allen Mccord <akmc54@yahoo.com>
Sent: Saturday, November 27, 2021 12:26 PM
To: COMMISSION ODFW * ODFW

Please for the good of all Oregonians maintain the harvest of wild steelhead wherever we have a healthy run. And lets maximize our harvestable hatchery fish. This would be good for all fisherpersons in the state, not just a select few.

thankyou
Kim McCord
Glide, Oregon

KINGSLEY Lisa M * ODFW

From: John Schrunk <johnschrunk1946@gmail.com>
Sent: Sunday, November 28, 2021 1:20 AM
To: COMMISSION ODFW * ODFW
Subject: Please maintain harvest o

F wild steelhead in our SW streams

KINGSLEY Lisa M * ODFW

From: John Schrunk <johnschrunk1946@gmail.com>
Sent: Sunday, November 28, 2021 1:26 AM
To: COMMISSION ODFW * ODFW
Subject: SW zone fishing

Please maintain harvest of wild steelhead in our SW streams and allow our hatcheries to maintain a healthy hatchery run

KINGSLEY Lisa M * ODFW

From: Steve Beyerlin <Steve@fishoregon.com>
Sent: Sunday, November 28, 2021 12:03 PM
To: ODFW Commission
Cc: Bob Spelbrink; Bob Main; Leonard and Anna Krug; Commissioner Court Boice; Christopher Paasch; John Herzog ; boice@co.douglas.or.us; Stan Steele; Dave Strahan; Gary & Val Earley; Tom Satterthwaite; fishhawk51@hotmail.com; Cam Parry; David Brock Smith; Herman Baertschiger; Tim Freeman
Subject: Interesting ODFW Info

ODFW Commissioners are in process of reviewing South Coast / Rogue Conservation Plan.

ODFW has not included Zone Regulation of 2 and 20 Harvest for Winter Steelhead in conservation plan but instead included either very limited harvest (1 & 3, 1 & 5) or none as select alternatives. There is no data to support a decline in any Winter Steelhead population in the SMU and a need for reduced harvest. Limited harvest has been in place to allow review and assessment only as a precaution that is being used now as a standard for harvest. It is not the standard it is a temporary agreed to rule. A temporary rule should be temporary and ODFW always has the option of emergency action if runs decline drastically.

I came across ODFW Conservation Plan Status Reports for the State. Rogue and South Coast SMU (Rogue, Chetco, Winchuck, Pistol, Illinois, or Elk rivers) shows ODFW Status of Winter and Summer Steelhead and other species covered in conservation plan. Winter Steelhead being the main issue now as Wild Release is in place for Summer Steelhead and Coho as well as Cutthroat Trout on the Rogue River.

We were not given this ODFW Conservation Plan Assessment information during Conservation Plan Meetings that I saw as a member of Rogue Plan, so it was never discussed or viewed or referred to, instead we were told they had not been Assessed yet (not really true). One would think this documented and posted to ODFW Conservation Plans page population assessments would have been included in the plan as a starting point. I have not found these pages of assessments within the Conservation Plan, this is a glaring inaccuracy in my view, the public is being misinformed without this information being included. Without this information wrong conclusions could easily be drawn and challenges raised down the road.

These numbers are a few years old but show history and population trajectory. Unless ODFW has found and reported new impacts or declining returns (they have not) harvest restrictions are their social wish not a biological based need. I requested on multiple occasions that Gold Ray Dam data be included in Conservation Plans – these assessments were partially derived from Gold Ray Dam counting station data and would have met that request if they were included.

5 Dams on the Rogue were removed after these assessment – Savage Rapids – Gold Ray – Gold Hill diversion Dam all on mainstem Rogue River / 2 more on Evans Creek a large Winter Steelhead spawning tributary. No other river included in the South Coast Conservation Plan has a Dam, just Rogue Basin.

[Microsoft Word - VolIF WST c Rogue \(state.or.us\)](https://www.oregon.gov/odfw/assessments/VolIF_WST_c_Rogue/state.or.us)

(ODFW COMMENTS from ODFW Assessments)

Go to: [ODFW Native Fish Conservation - Conservation and Recovery Plans \(state.or.us\)](https://www.oregon.gov/odfw/assessments/Conservation_and_Recovery_Plans/state.or.us) click on assessment for species and location for ODFW Info.

Winter Steelhead

This SMU includes eight populations within coastal basins of the Klamath Mountains Province in southwestern Oregon. **Each of the interim criteria was passed so the near-term sustainability of the SMU is not at risk.**

- Recruit per spawner estimates were available for the mainstem Rogue and Applegate, and both of these populations passed.
- **Data were not available for other populations, so the Rogue and Applegate were assumed to be representative of the SMU.**
- **Low spawner numbers in the late 1980s and early 1990s produced high rates of return.**
- Monitoring at Elk Creek since 1995 has shown that hatchery fractions in the mainstem Rogue are below 10%.
- Recent data from the Applegate indicated that the presence of naturally spawning hatchery fish was below 10%.
- No hatchery fish are released in the Winchuck, Pistol, Illinois, or Elk rivers and out-of-basin straying is uncommon.
- **Hatchery spawners in the Chetco are likely below 10% based on spawning surveys in 2004.**

Coho SMU: Wild returns to the Rogue in the last four years are among the greatest in the 20 years of estimates.

Cutthroat Trout: Quantitative data are not available at a population level. However, the existing data, along with professional opinion and anecdotal observations, suggest that coastal cutthroat trout are relatively abundant throughout the SMU. Microsoft Word.

As a last comment I may have missed this data in the hundreds of pages within the Conservation Plans that appear to me to confuse rather than clarify the issue.

Principle Questions not Clearly Stated

- Are populations at risk (yes or no) ODFW Assessment says **No**.
- Is harvest a limiting Factor Plan and Assessments say **No**.
- Are harvest alternatives properly represented? **No**. General Regulation alternative not included nor presented in public meetings.
- Was all available relating data reviewed by Conservation Plan Members. **No**. ODFW Conservation Plan Assessments were withheld.

ODFW Commissioners should send this Conservation Plan back as incomplete

Steve Beyerlin
Oregon Strong LLC.
Gold Beach, Oregon
(541) 247-4138 / steve@fishoregon.com

51 years of Fish Conservation Efforts on the Rogue River
25 Years on boards or Task Forces for ODFW
Member Rogue River Spring Salmon Conservation Plan Task Force
Member South Coast Fall Chinook Stakeholder Group
Member Rogue – South Coast Multi-Species Conservation and Management Plan
Fisheries and Natural Resource Consulting
Past President Oregon Guides and Packers
30 years as Oregon River Fishing Guide (Retired)
Founding Member and Past President of Curry Guides Association
Curry County Fisheries Coordinator



This email has been checked for viruses by Avast antivirus software.

www.avast.com

KINGSLEY Lisa M * ODFW

From: John Noreika <john@bozemantreeservice.com>
Sent: Monday, November 29, 2021 4:04 PM
To: COMMISSION ODFW * ODFW
Subject: Southern Oregon Wild Steelhead Harvest

Dear commission,
Please make all wild steelhead catch and release only until definitive data support the practice.
Thanks,
John

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

KINGSLEY Lisa M * ODFW

From: Jason Sherman <sherm70@hotmail.com>
Sent: Monday, November 29, 2021 5:21 PM
To: COMMISSION ODFW * ODFW
Subject: please maintain harvest of wild winter steelhead in Oregon SW streams

Please maintain harvest of wild winter steelhead in southwest oregon streams!

Jason sherman

KINGSLEY Lisa M * ODFW

From: Seth Howe <bughowe02@gmail.com>
Sent: Tuesday, November 30, 2021 9:43 AM
To: COMMISSION ODFW * ODFW
Subject: Wild Steelhead Harvest

Hello,

I among many other people believe that all wild steelhead harvest should be shutdown until we have the science and numbers to allow for harvest. I do believe that we should allow as many hatchery steelhead to be harvested per person as ODFW will allow. I am with Trout Unlimited and believe we should take part in a catch and release alternative.

Thank you,
Seth

Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Jason Grant <user@votervoice.net>
Sent: Tuesday, November 30, 2021 10:38 AM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Dear Chair Wahl,

My earliest childhood memories are of me standing along the banks of southwestern Oregon coastal rivers and streams fishing for wild winter steelhead with my dad. Both professionally and recreationally, I've spent my adult life pursuing steelhead throughout Oregon. Based on the current amount of available data related to adult escapement and the future impacts of climate change, it is too risky to continue to allow harvest of wild steelhead. Please implement a catch and release alternative as part of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP).

The RSP will dictate the management direction for many ecologically important steelhead waters. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever.

Sincerely,

Jason Grant
670 NW Green Forest Cir
Redmond, OR 97756
ifishgrant@yahoo.com

KINGSLEY Lisa M * ODFW

From: James Highland <jim@jimhighland.com>
Sent: Tuesday, November 30, 2021 6:28 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Support of wild steelhead

Dear Chair Wahl,

At the age of 76, I am a life-long Oregon steelheader. I have watched first-hand the decline of my fishery.... Please reconsider protecting wild steelhead stocks. If these fish are to have a future, you folks are the ones to help make that happen. Give wild fish some protection, please!

Sincerely,

James Highland
24001 E Rockwood Creek Ln
Rhododendron, OR 97049
jim@jimhighland.com

KINGSLEY Lisa M * ODFW

From: Rex Maurer <rexmaurer1@icloud.com>
Sent: Tuesday, November 30, 2021 11:51 PM
To: COMMISSION ODFW * ODFW
Subject: Wild steelhead

Catch and release is the only way to go. Isn't it obvious?!

Sent from my iPad

Public Correspondence

Received October 15 - November 30, 2021

**Changes to the RSP, and the stakeholder
process**

**The following conversation was submitted.
*(Email Chain Attached)***

KINGSLEY Lisa M * ODFW

From: joejanowicz123@aol.com
Sent: Wednesday, October 20, 2021 6:07 PM
To: steve.j.mazur@state.or.us; chris.m.lorion@state.or.us; daniel.j.vandyke@state.or.us; thomas.stahl@state.or.us; TATE Michelle L * ODFW; COMMISSION ODFW * ODFW; thomashawkins0307@gmail.com; heapr2003@gmail.com; jeremyknapp@gmail.com; wilddriversfishing@yahoo.com; mikemiller03@wildblue.net; webber@blackchapman.com; portmanager@portofgoldbeach.com; steve@fishoregon.com; grosjacquesd11@gmail.com; mlfxx2@charter.net; rlguideservice@yahoo.com; dstrahan@bigrocksports.com; peachykuehn@gmail.com
Subject: Fwd: Changes to the RSP, and the stakeholder process

-----Original Message-----

From: joejanowicz123@aol.com
To: oregonanglersalliance@outlook.com <oregonanglersalliance@outlook.com>
Sent: Wed, Oct 20, 2021 5:24 pm
Subject: Changes to the RSP, and the stakeholder process

Fellow stakeholders, ODFW staff, Commissioners

I am Joseph Janowicz I am the stakeholder for Curry Anadromous Fishermen a STEP group in Gold Beach, a member of Oregon Anglers Alliance, a conservationist fisherman.

After listening to the entire commission meeting on 10/15/21 it seems commissioners are considering drastically altering the wild fish harvest portion of the RSP. The Harvest component of the RSP is the bedrock, the foundation which supports the many other components of the plan. The parts of the RSP where consensus was reached were based on a plan that allowed native fish harvest for the next 5 years while more exacting monitoring, and data, paid for with increased harvest fees, would be accumulated and analyzed. This is what we agreed to and were promised in the spirit of compromise which we were encouraged to embrace. It is what we told our constituents when meeting with them to keep them apprised of current developments in the ongoing negotiations with stakeholders and the ODFW.

If you, as commissioners are seriously considering changes to the harvest matrix component then I, as a stakeholder will withdraw my support for the plan, and I encourage other stakeholders to follow suit. I respectfully request that ODFW reconvene the stakeholders to discuss the direct affect changes to the harvest component will have on other components of the plan. to name a few,

1. Increased angler fees.
2. Transitioning to on line phone reporting of catch.
3. Increased monitoring of catch to be funded by increased fees.
4. Mixed fish vs. Wild fish emphasis areas.
5. Hatchery production and support.

When we as stakeholders discussed the plan during its formation, with our constituents, agreement was reached to support the aforementioned parts of the plan as part of a suite of options which included harvest. Imagine the frustration, disappointment and even disgust with the process when I inform them that there will be increased fees for monitoring, stricter reporting and enforcement, and little or no harvest on your home streams.

There is nothing but emotional testimony to justify a suspension of harvest. In fact, the current data obtained by ODFW biologists supports the opposite. ODFW biologists and staff have made it clear that winter steelhead populations on Oregon's south coast are not in jeopardy and that proposed harvest levels of 10% to 15% specified in the plan will not significantly affect their population viability in the species management unit. Furthermore ODFW states winter steelhead in the S.M.U. are "strongly guarded", that the population is robust and can withstand harvest!

It appears that Commissioners are considering drastic changes to the wild harvest portion of the RSP based on testimony from unqualified, questionably credentialed, folks outside the area affected.

It is outrageous and disrespectful to give simple, often choreographed, scripted, testimony more credence than that given to the stakeholders who have spent a year and a half studying the data, provided by your own biologists that should be dictating policy. What is the point of having a stakeholder process at all if our hard work and compromise is thrown out the window at the last minute based on questionable testimony.

yours in conservation and harvest

Joseph Janowicz

Curry Anadromous Fishermen stakeholder

KINGSLEY Lisa M * ODFW

From: Steve Beyerlin <Steve@fishoregon.com>
Sent: Wednesday, October 20, 2021 6:48 PM
To: joejanowicz123@aol.com; steve.j.mazur@state.or.us; chris.m.lorion@state.or.us; daniel.j.vandyke@state.or.us; thomas.stahl@state.or.us; TATE Michelle L * ODFW; COMMISSION ODFW * ODFW; thomashawkins0307@gmail.com; heapr2003@gmail.com; jeremyknapp@gmail.com; wilddriversfishing@yahoo.com; mikemiller03@wildblue.net; webber@blackchapman.com; portmanager@portofgoldbeach.com; grosjacquesd11@gmail.com; mlfxx2@charter.net; rlguideservice@yahoo.com; dstrahan@bigrocksports.com; peachykuehn@gmail.com
Cc: REP SmithD; Commissioner Court Boice; Bob Main; Christopher Paasch; John Herzog
Subject: RE: Changes to the RSP, and the stakeholder process

Well said Joe – I understand only 2 members of ODFW Commission buy hunting and fishing licenses one has never hunted or fished legally and states she never will, not sure if that's the same one that says they know nothing about fish and wildlife management – Geez!!

That is not proper representation of true Oregon sportsmen and women. The Oregon Fish Commission was formed to assure angler harvest opportunities in 1939 with the first license fees to be spent in the district collected and spent on hatchery production an implied contract between the state and angling public to do otherwise is breach of contract that is renewed every year when a fishing license is purchased.

A good look back for all Commissioners and sportsmen and women: [ODFW History \(state.or.us\)](https://state.or.us/odfw-history)

Steve Beyerlin
Oregon Strong LLC.
Gold Beach, Oregon
(541) 247-4138 / steve@fishoregon.com

51 years of Fish Conservation Efforts on the Rogue River
25 Years on boards or Task Forces for ODFW
Member Rogue River Spring Salmon Conservation Plan Task Force
Member South Coast Fall Chinook Stakeholder Group
Member Rogue – South Coast Multi-Species Conservation and Management Plan
Fisheries and Natural Resource Consulting
Past President Oregon Guides and Packers
30 years as Oregon River Fishing Guide (Retired)
Founding Member and Past President of Curry Guides Association
Curry County Fisheries Coordinator

From: joejanowicz123@aol.com [mailto:joejanowicz123@aol.com]
Sent: Wednesday, October 20, 2021 6:07 PM
To: steve.j.mazur@state.or.us; chris.m.lorion@state.or.us; daniel.j.vandyke@state.or.us; thomas.stahl@state.or.us; michelle.l.tate@odfw.oregon.gov; odfw.commission@odfw.oregon.gov; thomashawkins0307@gmail.com; heapr2003@gmail.com; jeremyknapp@gmail.com; wilddriversfishing@yahoo.com; mikemiller03@wildblue.net; webber@blackchapman.com; portmanager@portofgoldbeach.com; steve@fishoregon.com; grosjacquesd11@gmail.com;

mlfxx2@charter.net; rlguideservice@yahoo.com; dstrahan@bigrocksports.com; peachykuehn@gmail.com

Subject: Fwd: Changes to the RSP, and the stakeholder process

-----Original Message-----

From: joejanowicz123@aol.com

To: oregonanglersalliance@outlook.com <oregonanglersalliance@outlook.com>

Sent: Wed, Oct 20, 2021 5:24 pm

Subject: Changes to the RSP, and the stakeholder process

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yours in conservation and harvest

Joseph Janowicz

Curry Anadromous Fishermen stakeholder



This email has been checked for viruses by Avast antivirus software.

www.avast.com

KINGSLEY Lisa M * ODFW

From: Richard Heap <heapr2003@gmail.com>
Sent: Wednesday, October 20, 2021 8:07 PM
To: joejanowicz123@aol.com
Cc: steve.j.mazur@state.or.us; chris.m.lorion@state.or.us; daniel.j.vandyke@state.or.us; thomas.stahl@state.or.us; TATE Michelle L * ODFW; COMMISSION ODFW * ODFW; thomashawkins0307@gmail.com; jeremyknapp@gmail.com; wilddriversfishing@yahoo.com; mikemiller03@wildblue.net; webber@blackchapman.com; portmanager@portofgoldbeach.com; Steve@fishoregon.com; grosjacquesd11@gmail.com; mlfxx2@charter.net; rlguideservice@yahoo.com; dstrahan@bigrocksports.com; peachykuehn@gmail.com
Subject: Re: Changes to the RSP, and the stakeholder process

Joe,
I agree and your comments hold true for the group I represent, the Oregon South Coast Fishermen.
Richard.

Sent from my iPad

On Oct 20, 2021, at 6:07 PM, joejanowicz123@aol.com wrote:

-----Original Message-----

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yours in conservation and harvest

Joseph Janowicz

Curry Anadromous Fishermen stakeholder

KINGSLEY Lisa M * ODFW

From: Thomas Hawkins <thomashawkins0307@gmail.com>
Sent: Thursday, October 21, 2021 1:15 PM
To: joejanowicz123@aol.com
Cc: chris.m.lorion@state.or.us; daniel.j.vandyke@state.or.us; dstrahan@bigrocksports.com; grosjacquesd11@gmail.com; heapr2003@gmail.com; jeremyknapp@gmail.com; TATE Michelle L * ODFW; mikemiller03@wildblue.net; mlfxx2@charter.net; COMMISSION ODFW * ODFW; peachykuehn@gmail.com; portmanager@portofgoldbeach.com; rlguideservice@yahoo.com; steve.j.mazur@state.or.us; steve@fishoregon.com; thomas.stahl@state.or.us; webber@blackchapman.com; wilddriversfishing@yahoo.com
Subject: Re: Changes to the RSP, and the stakeholder process

Joe as the chair of Curry Citizens For Public Land Access I wholeheartedly agree with you. It's too bad that even our fish and wildlife have been politicized to the detriment of the resource.

On Wed, Oct 20, 2021 at 6:07 PM <joejanowicz123@aol.com> wrote:

-----Original Message-----

From: joejanowicz123@aol.com
To: oregonanglersalliance@outlook.com <oregonanglersalliance@outlook.com>
Sent: Wed, Oct 20, 2021 5:24 pm
Subject: Changes to the RSP, and the stakeholder process

Fellow stakeholders, ODFW staff, Commissioners

I am Joseph Janowicz I am the stakeholder for Curry Anadromous Fishermen a STEP group in Gold Beach, a member of Oregon Anglers Alliance, a conservationist fisherman.

After listening to the entire commission meeting on 10/15/21 it seems commissioners are considering drastically altering the wild fish harvest portion of the RSP. The Harvest component of the RSP is the bedrock, the foundation which supports the many other components of the plan. The parts of the RSP where consensus was reached were based on a plan that allowed native fish harvest for the next 5 years while more exacting monitoring, and data, paid for with increased harvest fees, would be accumulated and analyzed. This is what we agreed to and were promised in the spirit of compromise which we were encouraged to embrace. It is what we told our constituents when meeting with them to keep them apprised of current developments in the ongoing negotiations with stakeholders and the ODFW.

If you, as commissioners are seriously considering changes to the harvest matrix component then I, as a stakeholder will withdraw my support for the plan, and I encourage other stakeholders to follow suit. I respectfully request that ODFW reconvene the stakeholders to discuss the direct affect changes to the harvest component will have on other components of the plan. to name a few,

1. Increased angler fees.
2. Transitioning to on line phone reporting of catch.
3. Increased monitoring of catch to be funded by increased fees.
4. Mixed fish vs. Wild fish emphasis areas.
5. Hatchery production and support.

When we as stakeholders discussed the plan during its formation, with our constituents, agreement was reached to support the aforementioned parts of the plan as part of a suite of options which included harvest. Imagine the frustration, disappointment and even disgust with the process when I inform them that there will be increased fees for monitoring, stricter reporting and enforcement, and little or no harvest on your home streams.

There is nothing but emotional testimony to justify a suspension of harvest. In fact, the current data obtained by ODFW biologists supports the opposite. ODFW biologists and staff have made it clear that winter steelhead populations on Oregon's south coast are not in jeopardy and that proposed harvest levels of 10% to 15% specified in the plan will not significantly affect their population viability in the species management unit. Furthermore ODFW states winter steelhead in the S.M.U. are "strongly guarded", that the population is robust and can withstand harvest!

It appears that Commissioners are considering drastic changes to the wild harvest portion of the RSP based on testimony from unqualified, questionably credentialed, folks outside the area affected.

It is outrageous and disrespectful to give simple, often choreographed, scripted, testimony more credence than that given to the stakeholders who have spent a year and a half studying the data, provided by your own biologists that should be dictating policy. What is the point of having a stakeholder process at all if our hard work and compromise is thrown out the window at the last minute based on questionable testimony.

yours in conservation and harvest

Joseph Janowicz

Curry Anadromous Fishermen stakeholder

Public Correspondence

Received October 15 - November 30, 2021

Checking In

The following conversation was submitted.
(Email Chain Attached)

KINGSLEY Lisa M * ODFW

From: Steve Beyerlin <Steve@fishoregon.com>
Sent: Sunday, October 31, 2021 12:49 PM
To: Comissioner Court Boice; 'Anthony Pope'
Cc: 'Oregon Anglers Alliance'; 'Rabiah Lee'; Bob Main; Bob Spelbrink; Cam Parry; Christopher Paasch; David Brock Smith; Gene Gros; Herman Baertschiger; John Herzog ; Josh Bettesworth; Tom Satterthwaite; Curt Melcher; Dan VanDyke; Lance Kruzic; ODFW Commission; Steve Mazur; boice@co.douglas.or.us
Subject: RE: checking in

If I may comment on this email string as Curry County Fisheries Coordinator and representing Curry County on South Coast Conservation Plan Rogue Stratum

I do not agree with total fishery closures, I believe opportunity should be allowed at all times but the most critical times. There is no data that shows that critical time exist. ODFW in this week ODFW Bulletin touted large returns of Coho up and down the coast. The only real population numbers we get are from the ODFW seining project on the Rogue at Huntley Park that has been done for many many decades and used to guide fisheries in Southern Oregon. Other South Coast streams have shown that they also track with these numbers retrieved from Huntley Park data.

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What this shows is there is no critical decline in South Coast fisheries and 2 Salt species (Coho and Steelhead) are extremely healthy and Fall Chinook numbers are on the rise. Unless new ODFW studies can show a severe decline trend (ODFW has not developed monitoring systems promised over a decade ago to do so) angling opportunity should be robust.

ODFW staff at Gold Beach Conservation Plan Public meeting held at Curry County Fairgrounds; when asked by me if the proposed quotas of; No Harvest of Wild – 1 and 3 harvest rate – 1/5 harvest rate were biologically supported stated to the audience that all these harvest levels were social not biological. (I expected this answer as ODFW has no way of counting winter time returns as streams are flashy with rains and often inaccessible to staff, they have not solved those issues).

If we have record or near record counts at Huntley Park why would harvest not be general regulation of 2 Wild a day and 10 Wild per year! Proposed harvest restrictions are not biologically supported but being driven by Catch and Release

advocates as a social stance. By the way Zone general regulations were not even considered as an option but a full no harvest ban on Wild Winters Steelhead was – Wild Coho harvest is already banned due to NMFS listing.

NMFS says the Rogue Coho run is healthy and fishing could be opened to harvest but for Rogue River Coho being lumped in with N. California stocks. (I don't believe ODFW has asked NMFS to allow limited Rogue River Wild Coho harvest and we sure won't get this expanded harvest without a ODFW Staff request.

I say be careful falling or bending to the Social push by Native Fish Society and others (include ODFW staff) that are not scientifically backed. ODFW is pushing a Conservation Plan for the South Coast with limited harvest opportunities but no general regulation option of 2 and 10 for winter steelhead and adding additional fees to harvest any Wild Steelhead. Just not including the general zone harvest regulation for Winter Steelhead shows ODFW bias.

Steve Beyerlin
Oregon Strong LLC.
Gold Beach, Oregon
(541) 247-4138 / steve@fishoregon.com

51 years of Fish Conservation Efforts on the Rogue River
25 Years on boards or Task Forces for ODFW
Member Rogue River Spring Salmon Conservation Plan Task Force
Member South Coast Fall Chinook Stakeholder Group
Member Rogue – South Coast Multi-Species Conservation and Management Plan
Fisheries and Natural Resource Consulting
Past President Oregon Guides and Packers
30 years as Oregon River Fishing Guide (Retired)
Founding Member and Past President of Curry Guides Association
Curry County Fisheries Coordinator

From: Court Boice [mailto:boicec@co.curry.or.us]
Sent: Sunday, October 31, 2021 11:22 AM
To: Anthony Pope
Cc: steve beyerlin; Oregon Anglers Alliance; Rabiah Lee
Subject: RE: checking in

*Hi Counsel Pope;
Can you please get copies of this to the other two Commissioners... Really good info. for our agenda item on 11-3-21*

***Note:** This portion of the email was in a font that Adobe did not recognize, so the font was adjusted for readability.*

Received from Leonard Krug – 6:37 am – 10-31-21

Just thought that I'd see if you were up and working as usual. I was wondering if you had any interest in talking about this South Coast Conservation Plan. There are about 3 general points that support a continued conservative harvest of winter steelhead. Compensatory Mortality, Monitoring Data, and more importantly the unseen backlash of likely having to provide more hatchery programs in these streams to compensate for lost harvest. Do we want to saturate the South Coast streams with hatchery fish as we have in other places that have eliminated harvest of wild?

This district has been managed on the extreme side of conservation for decades. We invented precautionary measures; they're not new to us, only to some that are new to the game.

On a final note, we have objected to any mandatory catch and release regulations from the beginning. Especially when it comes to triggering a conservation status harvest closure. To eliminate all risk, we should opt for complete closure, not C&R.

The opinion of Curry County will weigh heavily on the decision of the Commission.
Call me anytime if you're interested in the details.

Thank you for your passion and dedication,
Leonard

Received from Leonard Krug – 10:40 am – 10-31-21

RSP comments – Good Notes From L. Krug – Oregon Anglers – 11-1-21

There are some general points that support a continued conservative harvest of winter steelhead that need to be considered.

1. Compensatory Mortality;

These fish cannot be stockpiled. They cannot be banked. If we choose to not harvest a portion of them annually, we will not have more fish next year, or twenty years from now. As a comparable, the Umpqua PVA analysis states that winter steelhead may be harvested up to almost a 50% rate with zero risk of extinction over a 100-year period. We are harvesting the South Coast winter steelhead collectively at approximately 6%. It is common ODFW opinion that we could not threaten the viability of these fish from sportfishing.

We have gone from a 20 fish catch limit, to a 10 fish annual limit, to a 5 limit that was deemed to withstand the tests of time, and in 2018 for no biological reason, gone to an interim 3 a year limit.

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The adult monitoring of winter steelhead has never been a priority. It has always been common opinion that monies would be better spent elsewhere because;

1. It doesn't take many adults to fully seed the habitat with juveniles. There is little correlation between return numbers and juvenile numbers. It is the ocean and in-stream habitat that are the primary limiting factors.

2. Adult monitoring of winter steelhead is very difficult because of high waters, difficult access, and their propensity to rush upstream, spawn very quickly, and return to the ocean. Radio telemetry studies indicate that these fish will travel a bit, but when it comes time for them to spawn, they have an innate homing device that will guide them to their place of origin. For hatchery fish, this means their release site.

Eliminating harvest of winter steelhead may create an unseen backlash of;

1. providing more hatchery programs in these streams to compensate for lost harvest. Do we want to saturate the South Coast streams with hatchery fish as we have in other places that have eliminated harvest of wild?
2. Elimination for the need to continue monitoring. Monitoring is based around harvest. No harvest means no need for monitoring. History proves that lack of harvest severely reduces or eliminates any monitoring dollars.
3. Elimination of proposed harvest tags and endorsements.
4. A huge blow to the fragile economies of our tiny south coast communities.

On a final note, we have objected to any mandatory catch and release regulations from the beginning. Especially when it comes to triggering a conservation status harvest closure. To eliminate all risk, we should opt for complete closure, not C&R.

Leonard Krug
RSP Stakeholder

From: Oregon Anglers Alliance <OregonAnglersAlliance@outlook.com>

Sent: Sunday, October 31, 2021 6:37 AM

To: Court Boice <boicec@co.curry.or.us>

Subject: checking in

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Thank you for your passion and dedication,
Leonard
541-659-0976

This email has been checked for viruses by Avast antivirus software.

www.avast.com



KINGSLEY Lisa M * ODFW

From: Court Boice <boicec@co.curry.or.us>
Sent: Sunday, October 31, 2021 1:09 PM
To: Steve Beyerlin; Anthony Pope
Cc: 'Oregon Anglers Alliance'; Rabiah Lee; Bob Main; Bob Spelbrink; Cam Parry; Christopher Paasch; David Brock Smith; Gene Gros; Herman Baertschiger; John Herzog; Josh Bettsworth; Tom Satterthwaite; Curt Melcher; Dan VanDyke; Lance Kruzic; ODFW Commission; Steve Mazur; boicec@co.douglas.or.us
Subject: RE: checking in

Hi Steve;

I just assumed you were in full contribution to this email chain – I'm the last one to ever want to inadvertently leave you of all parties out.

We can postpone this until the late CCC Board meeting this month and still make the comment deadline. As you know, our response to ODF&W is very important and obviously needs your full input. Thanks for this terrific update and all your great work...

*Court Boice
Curry County Oregon Commissioner*



Oregon's fabulous Southwest "Curry Corner" of tremendous beauty, Country values and Commerce for a better tomorrow.

Rare to the planet! Combining the Greatest Ocean, Biggest Trees, Rugged Mountains, Most Pristine Rivers, and the Wildest Fish...!

boicec@co.curry.or.us
www.co.curry.or.us

541.247.3229 office
541.661.6150 cell

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From: Steve Beyerlin <Steve@fishoregon.com>

Sent: Sunday, October 31, 2021 12:49 PM

To: Court Boice <boicec@co.curry.or.us>; Anthony Pope <popea@co.curry.or.us>

Cc: 'Oregon Anglers Alliance' <OregonAnglersAlliance@outlook.com>; Rabiah Lee <leer@co.curry.or.us>; Bob Main <rmain@co.coos.or.us>; Bob Spelbrink <allied1inc@gmail.com>; Cam Parry <camparry@frontier.com>; Christopher Paasch <paaschc@co.curry.or.us>; David Brock Smith <davidbrocksmith@gmail.com>; Gene Gros <gene@highwayproducts.com>; Herman Baertschiger <hbaertschiger@josephinecounty.gov>; John Herzog <herzogj@co.curry.or.us>; Josh Bettsworth <jbettsworth@englundmarine.com>; Tom Satterthwaite <tsbs53@hotmail.com>; Curt Melcher <curt.melcher@state.or.us>; Dan VanDyke <daniel.j.vandyke@state.or.us>; Lance Kruzic <lance.kruzic@noaa.gov>; ODFW Commission <odfw.commission@state.or.us>; Steve Mazur <steve.j.mazur@state.or.us>; boice@co.douglas.or.us

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Steve Beyerlin
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30 years as Oregon River Fishing Guide (Retired)
Founding Member and Past President of Curry Guides Association
Curry County Fisheries Coordinator

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Sent: Sunday, October 31, 2021 11:22 AM
To: Anthony Pope
Cc: steve beyerlin; Oregon Anglers Alliance; Rabiah Lee
Subject: RE: checking in

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Sent: Sunday, October 31, 2021 6:37 AM

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www.avast.com

KINGSLEY Lisa M * ODFW

From: Stan Steele <riverrunguide@yahoo.com>
Sent: Sunday, October 31, 2021 1:57 PM
To: Comissioner Court Boice; 'Anthony Pope'; Steve Beyerlin
Cc: 'Oregon Anglers Alliance'; 'Rabiah Lee'; Bob Main; Bob Spelbrink; Cam Parry; Christopher Paasch; David Brock Smith; Gene Gros; Herman Baertschiger; John Herzog; Josh Bettsworth; Tom Satterthwaite; Curt Melcher; Dan VanDyke; Lance Kruzic; ODFW Commission; Steve Mazur; boice@co.douglas.or.us
Subject: Re: checking in

Steve, I couldn't agree more with your assessment!

Stan

On Sunday, October 31, 2021, 12:49:02 PM PDT, Steve Beyerlin <steve@fishoregon.com> wrote:

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NMFS says the Rogue Coho run is healthy and fishing could be opened to harvest but for Rogue River Coho being lumped in with N. California stocks. (I don't believe ODFW has asked NMFS to allow limited Rogue River Wild Coho harvest and we sure won't get this expanded harvest without a ODFW Staff request.

I say be careful falling or bending to the Social push by Native Fish Society and others (include ODFW staff) that are not scientifically backed. ODFW is pushing a Conservation Plan for the South Coast with limited harvest opportunities but no general regulation option of 2 and 10 for winter steelhead and adding additional fees to harvest any Wild Steelhead. Just not including the general zone harvest regulation for Winter Steelhead shows ODFW bias.

Steve Beyerlin
Oregon Strong LLC.
Gold Beach, Oregon
(541) 247-4138 / steve@fishoregon.com

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30 years as Oregon River Fishing Guide (Retired)
Founding Member and Past President of Curry Guides Association
Curry County Fisheries Coordinator

From: Court Boice [mailto:boicec@co.curry.or.us]
Sent: Sunday, October 31, 2021 11:22 AM
To: Anthony Pope
Cc: steve beyerlin; Oregon Anglers Alliance; Rabiah Lee
Subject: RE: checking in

Hi Counsel Pope;

Can you please get copies of this to the other two Commissioners... Really good info. for our agenda item on 11-3-21

#

Received from Leonard Krug – 10:40 am – 10-31-21

RSP comments – Good Notes From L. Krug – Oregon Anglers – 11-1-21

There are some general points that support a continued conservative harvest of winter steelhead that need to be considered.

1. Compensatory Mortality;

These fish cannot be stockpiled. They cannot be banked. If we choose to not harvest a portion of them annually, we will not have more fish next year, or twenty years from now. As a comparable, the Umpqua PVA analysis states that winter steelhead may be harvested up to almost a 50% rate with zero risk of extinction over a 100-year period. We are harvesting the South Coast winter steelhead collectively at approximately 6%. It is common ODFW opinion that we could not threaten the viability of these fish from sportfishing.

We have gone from a 20 fish catch limit, to a 10 fish annual limit, to a 5 limit that was deemed to withstand the tests of time, and in 2018 for no biological reason, gone to an interim 3 a year limit.

This district has been managed on the extreme side of conservation for decades. We invented precautionary measures; they're not new to us, only to some that are new to the game.

The adult monitoring of winter steelhead has never been a priority. It has always been common opinion that monies would be better spent elsewhere because;

1. It doesn't take many adults to fully seed the habitat with juveniles. There is little correlation between return numbers and juvenile numbers. It is the ocean and in-stream habitat that are the primary limiting factors.

2. Adult monitoring of winter steelhead is very difficult because of high waters, difficult access, and their propensity to rush upstream, spawn very quickly, and return to the ocean. Radio telemetry studies indicate that these fish will travel a bit, but when it comes time for them to spawn, they have an innate homing device that will guide them to their place of origin. For hatchery fish, this means their release site.

Eliminating harvest of winter steelhead may create an unseen backlash of;

1. providing more hatchery programs in these streams to compensate for lost harvest. Do we want to saturate the South Coast streams with hatchery fish as we have in other places that have eliminated harvest of wild?

2. Elimination for the need to continue monitoring. Monitoring is based around harvest. No harvest means no need for monitoring. History proves that lack of harvest severely reduces or eliminates any monitoring dollars.

3. Elimination of proposed harvest tags and endorsements.

4. A huge blow to the fragile economies of our tiny south coast communities.

On a final note, we have objected to any mandatory catch and release regulations from the beginning. Especially when it comes to triggering a conservation status harvest closure. To eliminate all risk, we should opt for complete closure, not C&R.

Leonard Krug

RSP Stakeholder

KINGSLEY Lisa M * ODFW

From: Stan Steele <riverrunguide@yahoo.com>
Sent: Sunday, October 31, 2021 1:57 PM
To: Comissioner Court Boice; 'Anthony Pope'; Steve Beyerlin
Cc: 'Oregon Anglers Alliance'; 'Rabiah Lee'; Bob Main; Bob Spelbrink; Cam Parry; Christopher Paasch; David Brock Smith; Gene Gros; Herman Baertschiger; John Herzog; Josh Bettsworth; Tom Satterthwaite; Curt Melcher; Dan VanDyke; Lance Kruzic; ODFW Commission; Steve Mazur; boice@co.douglas.or.us
Subject: Re: checking in

Steve, I couldn't agree more with your assessment!

Stan

On Sunday, October 31, 2021, 12:49:02 PM PDT, Steve Beyerlin <steve@fishoregon.com> wrote:

If I may comment on this email string as Curry County Fisheries Coordinator and representing Curry County on South Coast Conservation Plan Rogue Stratum

I do not agree with total fishery closures, I believe opportunity should be allowed at all times but the most critical times. There is no data that shows that critical time exist. ODFW in this week ODFW Bulletin touted large returns of Coho up and down the coast. The only real population numbers we get are from the ODFW seining project on the Rogue at Huntley Park that has been done for many many decades and used to guide fisheries in Southern Oregon. Other South Coast streams have shown that they also track with these numbers retrieved from Huntley Park data.

In 2021 seining: [Huntley Park Fish Counts | Oregon Department of Fish & Wildlife \(myodfw.com\)](#)

Fall Chinook returns equaled the 10 year average in 2021, in 2020 Fall Chinook returns were about 20% below 10 year average – Fall Chinook are a 4 year return speices, Steelhead and Coho are 2 years or less.

Summer Steelhead Adults came in 25% above the 10 year average even with 4 days of no seining because of high water. (about 8% od count days).

Summer Steelhead ½ pounders were near record return. The 10 year average is 2569 – this year 3976 over 40% above the 10 year average. ODFW uses ½ pounder counts to judge Winter Steelhead return predictions for that year as they track well with Winter Steelhead Adult returns. (4 days of no seining because of high water. (about 8% of total count days). Last year in 2020 ½ pounders met the 10 year average.

Coho or Silver Salmon blew the 10 year average out of the water. The 10 year average is 190 (a lot come in after seining ends for the year). This year 624 Coho were captured (3.3 times the 10 year average. (4 days of no seining because of

high water. (about 8% of total count days – this is important for Coho count as those lost 4 days of count in 2019 accounted for 20% of the season total count. In 2019 and 2020 Coho met the 10 year average.

What this shows is there is no critical decline in South Coast fisheries and 2 Salt species (Coho and Steelhead) are extremely healthy and Fall Chinook numbers are on the rise. Unless new ODFW studies can show a severe decline trend (ODFW has not developed monitoring systems promised over a decade ago to do so) angling opportunity should be robust.

ODFW staff at Gold Beach Conservation Plan Public meeting held at Curry County Fairgrounds; when asked by me if the proposed quotas of; No Harvest of Wild – 1 and 3 harvest rate – 1/5 harvest rate were biologically supported stated to the audience that all these harvest levels were social not biological. (I expected this answer as ODFW has no way of counting winter time returns as streams are flashy with rains and often inaccessible to staff, they have not solved those issues).

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From: Court Boice [mailto:boicec@co.curry.or.us]
Sent: Sunday, October 31, 2021 11:22 AM
To: Anthony Pope
Cc: steve beyerlin; Oregon Anglers Alliance; Rabiah Lee
Subject: RE: checking in

KINGSLEY Lisa M * ODFW

From: Oregon Anglers Alliance <OregonAnglersAlliance@outlook.com>
Sent: Monday, November 1, 2021 7:43 AM
To: Steve Beyerlin; Comissioner Court Boice; 'Anthony Pope'
Cc: 'Rabiah Lee'; Bob Main; Bob Spelbrink; Cam Parry; Christopher Paasch; David Brock Smith; Gene Gros; Herman Baertschiger; John Herzog ; Josh Bettsworth; Tom Satterthwaite; Curt Melcher; Dan VanDyke; Lance Kruzic; ODFW Commission; Steve Mazur; boice@co.douglas.or.us
Subject: Re: checking in
Attachments: 11-1-21C&RRSP.docx

Steve, just to clear up a few murky details,

The opinion of not agreeing to mandatory catch and release reg's for South Coast winter steelhead was formed and written early on and throughout this process by the OAA as a group, along with a majority of South Coast Stakeholders. The record shows that we will not agree with C&R and have stated that if the regulations are being implemented because there is a threat to the viability of these fish, then a complete closure should be enacted, not C&R. We are not advocating for closures. We cannot control what the Commission may, or may not do.

I'm sorry to clog up all of your email Ques, but attached you will find an opinion on C&R that has been put together by the group. In addition, see the statement below from the email to Court that accompanied the added document. I thought that it would lend some clarity on the matter.

"Looks good to me Court. One note of interest is that this plan is about Steelhead, Cut-throat trout, and Coho salmon only, so when we reference things like only having one small hatchery program on our south coast streams, we are referring to winter steelhead, not the Rogue River hatchery mitigation programs as the Rogue is a separate stratum, or the Chetco Fall Chinook Program which is covered under a different plan. Winter Steelhead are the main focus of this plan."

Please see the brief attachment on C&R.

Leonard

From: Steve Beyerlin <Steve@fishoregon.com>
Sent: Sunday, October 31, 2021 12:48 PM
To: 'Court Boice' <boicec@co.curry.or.us>; 'Anthony Pope' <popea@co.curry.or.us>
Cc: 'Oregon Anglers Alliance' <OregonAnglersAlliance@outlook.com>; 'Rabiah Lee' <leer@co.curry.or.us>; Bob Main <rmain@co.coos.or.us>; Bob Spelbrink <allied1inc@gmail.com>; Cam Parry <camparry@frontier.com>; Christopher Paasch <paaschc@co.curry.or.us>; David Brock Smith <davidbrocksmith@gmail.com>; Gene Gros <gene@highwayproducts.com>; Herman Baertschiger <hbaertschiger@josephinecounty.gov>; John Herzog <HerzogJ@co.curry.or.us>; Josh Bettsworth <jbettsworth@englundmarine.com>; Tom Satterthwaite <tsbs53@hotmail.com>; Curt Melcher <curt.melcher@state.or.us>; Dan VanDyke <daniel.j.vandyke@state.or.us>; Lance Kruzic <lance.kruzic@noaa.gov>; ODFW Commission <odfw.commission@state.or.us>; Steve Mazur <steve.j.mazur@state.or.us>; boice@co.douglas.or.us <boice@co.douglas.or.us>
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Sent: Sunday, October 31, 2021 11:22 AM
To: Anthony Pope
Cc: steve beyerlin; Oregon Anglers Alliance; Rabiah Lee
Subject: RE: checking in

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Eliminating harvest of winter steelhead may create an unseen backlash of;

1. providing more hatchery programs in these streams to compensate for lost harvest. Do we want to saturate the South Coast streams with hatchery fish as we have in other places that have eliminated harvest of wild?
2. Elimination for the need to continue monitoring. Monitoring is based around harvest. No harvest means no need for monitoring. History proves that lack of harvest severely reduces or eliminates any monitoring dollars.
3. Elimination of proposed harvest tags and endorsements.
4. A huge blow to the fragile economies of our tiny south coast communities.

On a final note, we have objected to any mandatory catch and release regulations from the beginning. Especially when it comes to triggering a conservation status harvest closure. To eliminate all risk, we should opt for complete closure, not C&R.

Leonard Krug
RSP Stakeholder

From: Oregon Anglers Alliance <OregonAnglersAlliance@outlook.com>

Sent: Sunday, October 31, 2021 6:37 AM

To: Court Boice <boicec@co.curry.or.us>

Subject: checking in

Just thought that I'd see if you were up and working as usual. I was wondering if you had any interest in talking about this South Coast Conservation Plan. There are about 3 general points that support a continued conservative harvest of winter steelhead. Compensatory Mortality, Monitoring Data, and more importantly the unseen backlash of likely having to provide more hatchery programs in these streams to compensate for lost harvest. Do we want to saturate the South Coast streams with hatchery fish as we have in other places that have eliminated harvest of wild?

This district has been managed on the extreme side of conservation for decades. We invented precautionary measures; they're not new to us, only to some that are new to the game.

On a final note, we have objected to any mandatory catch and release regulations from the beginning. Especially when it comes to triggering a conservation status harvest closure. To eliminate all risk, we should opt for complete closure, not C&R.

The opinion of Curry County will weigh heavily on the decision of the Commission.
Call me anytime if you're interested in the details.

Thank you for your passion and dedication,
Leonard
541-659-0976



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Public Correspondence

Received October 15 - November 30, 2021

Rogue South Coast Multi-Species Plan - Public Comment

**RSP Comments and RSP Final Draft Comments
letters were submitted by 22 individuals, and 17
were submitted with additional comments.**

(Letters & List Attached)

**Catch and Release for Wild Steelhead and
Please require Catch and Release for Wild
Steelhead in Southern Oregon letters were
submitted by 69 individuals, and 1 was
submitted with additional comments.**

(Letters & List Attached)

**Take Action: Conserve Wild Fish on Oregon's
South Coast letters were submitted by 102
individuals, and 7 submitted with additional
comments.**

(Letters & List Attached)

From: Michael Callan <mikecallan@cutbowinc.com>
Sent: Monday, November 1, 2021 8:44 AM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

Angling Alternatives

In response to the public draft of the RSP published in July, over 2250 people asked the department to implement catch and release regulations until there is adequate adult monitoring. The Commission Draft, provided as Attachment 3 for Exhibit 3 of the October 15, 2021 Commission meeting, does not provide the commission with any alternatives for Angling opportunities and does not propose catch and release for wild steelhead. I am very concerned that the department did not listen to the public and did not take their comments into consideration. Without current adult harvest monitoring, adult mortality, or adequate adult escapement for multiple generations, ODFW does not know the total impact of harvest on wild winter steelhead as a result of directed harvest and catch and release angling. I request the commission direct the department to change regulations to "Catch and Release" for wild winter steelhead on the Rogue and south coast until a five-year review of adequate monitoring data is available to inform harvest management.

Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

- Adult spawner escapement in each watershed
- Juvenile measurements correlated to adult escapement in each watershed
- Effects of harvest (mandatory reporting of all harvest and catch and release)
- Effects of hatcheries (pHOS)

Hatchery Actions

The current RSP provides a suite of actions that increase hatchery expansion throughout the Rogue and south coast.

I request that the department does not include any hatchery expansion in the RSP by making the following changes to the draft plan:

- Eliminate the newly proposed Euchre Creek and Winchuck River Mixed Emphasis Areas
- Eliminate offsite hatchery releases in the Rogue River
- Eliminate increased ESA listed Coho releases in the Rogue River
- Decrease smolt outputs to reach mitigation goals in the Rogue basin

I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Michael Callan
37 N Main St
Buffalo, WY 82834
mikecallan@cutbowinc.com

From: kirk@everyactioncustom.com on behalf of [Kirk Blaine](#)
To: [COMMISSION ODFW * ODFW](#)
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast
Date: Tuesday, November 23, 2021 1:39:44 PM

Dear ODFW Commission,

Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP).

Southwest Oregon is home to beautiful, globally unique watersheds like the Rogue, Illinois, and Chetco Rivers. Productive habitats and wild fish runs power local economies and are an important part of Southwest Oregon communities. Due to low steelhead returns this year, we saw emergency fishing closures on the Deschutes, John Day, and North Umpqua Rivers. These closures caused considerable economic and recreational loss. We are committed to preventing this from occurring in the RSP area through precautionary management.

Key steps to safeguarding the region's wild fish—and the economies and communities that depend on them—include catch-and-release for wild winter steelhead during a five-year data collection period, robust population monitoring, and cautious management of wild fish emphasis areas.

Managing wild fish in a precautionary manner will not only help keep southern Oregon salmon and steelhead off the Endangered Species List, but will also set the region up to better withstand the climate shocks that we know are coming—and that, in some cases, are already here. The localized effects of climate change adds considerable uncertainty to our sense of how well these populations will adapt and survive in a warmer, dryer future. We must acknowledge that wild harvest, hatchery production, habitat loss/degradation, poor ocean conditions, and climate change all work synergistically, not in isolation, and are having detrimental effects on our already-depleted wild salmon and steelhead stocks.

Where sufficient data are unavailable to adequately determine the population health in each of the RSP basins, conservation should be prioritized over wild harvest opportunities.

In order to protect wild fish in the RSP, I ask the commission to vote for the following alternatives.

Hatchery Management

To minimize risks to the wild fish runs from hatchery fish, I support:

- Wild Fish Emphasis Areas only in Euchre Creek or Winchuck River.
- No permanent hatchery acclimation sites on the Rogue or Chetco Rivers.
- No increase from current hatchery releases numbers for any species in any basin.
- Reevaluation of the summer steelhead program and release targets at Cole Rivers hatchery.

Wild Winter Steelhead Harvest

Until adequate data has been collected and clearly shows that wild winter steelhead populations can be sustainably harvested, we should implement the following wild steelhead protocols:

- Catch-and-release for wild winter steelhead in all basins for a five-year interim period.
- Support for electronic licensing, steelhead validation card.
- Support increased hatchery daily bag limits in the Rogue, Chetco, and Elk Rivers to maintain angler opportunities.

Thank you for the opportunity to provide my comments to the commission. We urge commissioners to manage these precious resources cautiously until the critical data gaps are ameliorated. Our best chance to have thriving wild salmon and steelhead populations in the future, is to act now.

Sincerely,
Mr. Kirk Blaine
124 Little Pheasant Ln Roseburg, OR 97470-9323
kirk@nativefishsociety.org

From: [Kirk Blaine](#)
To: [COMMISSION ODFW * ODFW](#)
Subject: Catch and Release for Wild Steelhead in Southern Oregon
Date: Wednesday, November 17, 2021 2:27:14 PM

Dear Chair Wahl and ODFW Commission,

Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species Conservation Management Plan (RSP). A plan centered around conservation and the long term health of identified species is critical to the future of these fish, the rivers, and the communities of southern Oregon. The following comments, concerns, and suggested changes are provided to ensure the conservation and future health of the identified species. I am deeply concerned the department did not consider public comments during the public comment period and has failed to provide the commission with the same suite of alternatives for discussion and consideration.

Angling Alternatives

In response to the public draft of the RSP published in July, over 2,260 people asked the department to implement catch and release regulations until there is adequate adult monitoring. The Commission Draft, provided as Attachment 3 for Exhibit 3 of the October 15, 2021 Commission meeting, does not provide the commission with any alternatives for angling opportunities and does not propose catch and release for wild steelhead. I am very concerned that the department did not listen to the public and did not take their comments into consideration. Without current adult harvest monitoring, adult mortality, or adequate adult escapement for multiple generations, ODFW does not know the total impact of harvest on wild winter steelhead as a result of directed harvest and catch and release angling. I request the commission direct the department to change regulations to "Catch and Release" for wild winter steelhead on the Rogue and south coast until a five-year review of adequate monitoring data is available to inform harvest management.

Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

- Adult spawner escapement in each watershed

- Juvenile measurements correlated to adult escapement in each watershed
- Effects of harvest (mandatory reporting of all harvest and catch and release)
- Effects of hatcheries (pHOS)

Hatchery Actions

The current RSP provides a suite of actions that increase hatchery expansion throughout the Rogue and south coast.

I request that the department does not include any hatchery expansion in the RSP by making the following changes to the draft plan:

- Eliminate the newly proposed Euchre Creek and Winchuck River Mixed Emphasis Areas
- Eliminate offsite hatchery releases in the Rogue River
- Eliminate increased ESA listed Coho releases in the Rogue River
- Decrease smolt outputs to reach mitigation goals in the Rogue basin

Thank you for the opportunity to provide comments on the Commission Draft of the RSP. Critical data and monitoring will be necessary to inform management of wild winter steelhead harvest on the Rogue and South Coast. Until that monitoring is in place and data available, I ask the Department to continue to provide the opportunity for catch and release angling for wild winter steelhead on the Rogue and south coast watersheds and harvest in the interim on hatchery origin stocks. These changes will provide the precautionary conservation management necessary to help restore and sustain wild abundance.

Sincerely,

Kirk Blaine

kblaine15@gmail.com 97470

    					From	Subject	Received	Size	Categories	Mention	
Older											
Karen Growney Please require Catch and Release for Wild Steelhead Fri 10/15/2021 8:... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Chase Oylar Please require Catch and Release for Wild Steelhead Sat 10/16/2021 7:... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Tom Bourgault Please require Catch and Release for Wild Steelhead Sat 10/16/2021 1:... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
DAVID NILSON Please require Catch and Release for Wild Steelhead Sun 10/17/2021 9... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Jacob Fenn Please require Catch and Release for Wild Steelhead Sun 10/17/2021 9... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Cassidy Quisto... Please require Catch and Release for Wild Steelhead Mon 10/18/2021 ... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Martin Lecholat Please require Catch and Release for Wild Steelhead Mon 10/18/2021 ... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Glenna Dowling Please require Catch and Release for Wild Steelhead Tue 10/19/2021 3... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Jim Yarbrough Please require Catch and Release for Wild Steelhead Tue 10/19/2021 8... 51 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Noah Heilbrun Please require Catch and Release for Wild Steelhead Wed 10/20/2021 ... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Harrison HILBE... Please require Catch and Release for Wild Steelhead Wed 10/20/2021 ... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Gerry McCain Please require Catch and Release for Wild Steelhead Thu 10/21/2021 7... 48 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Owen Thomps... Please require Catch and Release for Wild Steelhead Fri 10/22/2021 6:... 49 KB Dear Chair Wahl and OFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species Conservation											
Gracie Mahar Please require Catch and Release for Wild Steelhead Fri 10/22/2021 6:... 50 KB Dear Chair Wahl and OFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species Conservation											
Melania Longi... Please require Catch and Release for Wild Steelhead Fri 10/22/2021 6:... 49 KB Dear Chair Wahl and OFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species Conservation											
Emily Sullivan Please require Catch and Release for Wild Steelhead Fri 10/22/2021 9:... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
patrick clark Please require Catch and Release for Wild Steelhead Sun 10/24/2021 3... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Henry Kwok Please require Catch and Release for Wild Steelhead Mon 10/25/2021 ... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Henry Kwok Please require Catch and Release for Wild Steelhead Mon 10/25/2021 ... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species											
Evan LuthLuth RSP Comments Tue 10/26/2021 1... 53 KB Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management											
Charles Hamm... RSP Comments Sat 10/30/2021 2:... 54 KB Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management											

    		From	Subject	Received	Size	Categories	Mention	
		Dennis Murphy	RSP Comments	Sat 10/30/2021 2:...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Thom Peters	RSP Comments	Sat 10/30/2021 2:...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Gary Roulston	RSP Comments	Sat 10/30/2021 3:...	53 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Robert Aston	RSP Comments	Sat 10/30/2021 3:...	52 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Jeffrey Trafican	RSP Comments	Sat 10/30/2021 3:...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		John Hanousek	RSP Comments	Sat 10/30/2021 4:...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		E. James Nede...	RSP Comments	Sat 10/30/2021 7:...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Albert Mosche...	RSP Comments	Sat 10/30/2021 7:...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Robert Budd, ...	No killing of wild steelhead	Sat 10/30/2021 8:...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Steve Sturken	RSP Comments	Sun 10/31/2021 8...	52 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
Last Month								
		Michael Callan	RSP Comments	Mon 11/1/2021 8...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Stuart Mork	RSP Comments	Mon 11/1/2021 2...	54 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Ed Rossi	RSP Comments	Mon 11/1/2021 3...	52 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Kevin Mangan	RSP Comments	Mon 11/1/2021 9...	50 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Mark Rogers	RSP Comments	Tue 11/2/2021 3:...	50 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Douglas Rohn	Please require Catch and Release for Wild Steelhead	Fri 11/5/2021 9:1...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
Two Weeks Ago								
		Winnie Kenyon	Please require Catch and Release for Wild Steelhead	Tue 11/16/2021 1...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Jennifer Fairbr...	Catch and Release for Wild Steelhead in Southern Oregon	Wed 11/17/2021 ...	49 KB			
		Dear Oregon Department of Fish and Wildlife Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast						
		Kirk Blaine	Catch and Release for Wild Steelhead in Southern Oregon	Wed 11/17/2021 ...	51 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Lori Howk	Take Action: Conserve Wild Fish on Oregon's South Coast	Thu 11/18/2021 1...	49 KB			
		Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
		Jody Creasman	Take Action: Conserve Wild Fish on Oregon's South Coast	Thu 11/18/2021 1...	50 KB			
		Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						

    		From	Subject	Received	Size	Categories	Mention	
		Bruce McCullo...	Catch and Release for Wild Steelhead in Southern Oregon	Thu 11/18/2021 6...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Peter Brewer	Catch and Release for Wild Steelhead in Southern Oregon	Thu 11/18/2021 8...	48 KB			
		Dear Chair Wahl and ODFW Commission, Thank you very much for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Daniel Donog...	Catch and Release for Wild Steelhead in Southern Oregon	Thu 11/18/2021 8...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Mike Brunson	Catch and Release for Wild Steelhead in Southern Oregon	Thu 11/18/2021 8...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Sean Brady	Catch and Release for Wild Steelhead in Southern Oregon	Thu 11/18/2021 8...	48 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Hans Stephens...	Catch and Release for Wild Steelhead in Southern Oregon	Thu 11/18/2021 9...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Caryn Graves	Catch and Release for Wild Steelhead in Southern Oregon	Thu 11/18/2021 1...	48 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		PAUL ROBINO	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/19/2021 3:...	48 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		shannon johns...	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/19/2021 5:...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Duncan Kerst	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/19/2021 7:...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Chris Sheline	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/19/2021 7:...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Jerald Vegwert	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/19/2021 10...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Douglas Rohn	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/19/2021 11...	48 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Yancy Lind	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/19/2021 2:...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Curtis White	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/19/2021 4:...	48 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
Last Week								
		Chris Daughters	Catch and Release for Wild Steelhead in Southern Oregon	Sun 11/21/2021 6...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		David Jensen	Catch and Release for Wild Steelhead in Southern Oregon	Sun 11/21/2021 9...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Brian Buxton	RSP Comments	Sun 11/21/2021 3...	50 KB			
		Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management						
		Lisa Bettendorf	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	50 KB			
		Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
		Diana Grob	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	51 KB			
		Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
		Hank Ramirez	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	51 KB			
		Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						

    					From	Subject	Received	Size	Categories	Mention	
					Dennis Rogers	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Kristin Liebman	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Kirk Blaine	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	50 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Debra Rehn	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Ronnie Towns...	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	50 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Andrew Barker	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Andrea Pellicani	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Jerry Jump	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 2...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Greg Stawinoga	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 2...	50 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Nora Polk	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 2...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Sandra Couch	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 2...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Nathan Wetzel	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 2...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Justin Velella	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 2...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Dana Bleckinger	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 2...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Ellen McCann	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 3...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Suzanne Zerbey	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 3...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					carolyn giles	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 4...	50 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Anne Young	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 4...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					LAURA CHICO	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 4...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Torunn Sivesind	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 4...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Neilia Pierson	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 4...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Natalie Van Le...	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 5...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						

    					From	Subject	Received	Size	Categories	Mention	
					Marion Hadden	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 5...	50 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Victoria Holze...	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 5...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					David Cencula	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 6...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Phillip Callaway	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 6...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Dana Bleckinger	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 7...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Maureen ONeal	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 8...	50 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Debra Smith	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 9...	50 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Rick Luttmann	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Sandi Cornez	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Amy Carlson	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 11/23/2021 1...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					c s	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					MICHELLE RICE	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Nancy Enz Lill	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Mauria McClay	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	49 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					Judy Todd	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	50 KB			
					Dear ODFW Commission, Thank you for counting my message, in alignment with the Wild Salmon Center's good and scientific research and recommendations concerning the Rogue/South						
					Ian Brown	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	51 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					John Selove	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	51 KB			
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					Katherine Ann...	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	51 KB			
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					Leila Mohseni	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 11/24/2021 ...	49 KB			
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					Kim Wick	Take Action: Conserve Wild Fish on Oregon's South Coast	Thu 11/25/2021 6...	50 KB			
					Dear ODFW Commission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
					mark day	Take Action: Conserve Wild Fish on Oregon's South Coast	Fri 11/26/2021 8...	49 KB			
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    		From	Subject	Received	Size	Categories	Mention	
		Jordan Gulaskey	Take Action: Conserve Wild Fish on Oregon's South Coast	Fri 11/26/2021 10...	51 KB			
		Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
		Sean Brady	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/26/2021 7:...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Mike Bellmore	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/26/2021 7:...	51 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Andrew Kelly	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/26/2021 7:...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Pam Sheeler	Take Action: Conserve Wild Fish on Oregon's South Coast	Fri 11/26/2021 9:...	50 KB			
		Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
		Mike Brinkley	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/26/2021 9:...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Robert Hurley	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/26/2021 9:...	50 KB			
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		Joshua Nardie	Catch and Release for Wild Steelhead in Southern Oregon	Fri 11/26/2021 11...	51 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Curtis White	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 4:...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Peter Judkins	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 5:...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Arne Stemsrud	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 6:...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Clark Rector	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 7:...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Lisa Hansen	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 7:...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Robert Humph...	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 7:...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Timothy Devine	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 8:...	49 KB			
		Dear Chair Wahl and ODFW Commission, Save Our Steelhead and Salmon! Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue						
		Pat and Becky ...	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 8:...	50 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Matt Neznanski	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 8:...	49 KB			
		Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species						
		Duncan Kerst	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 1:...	49 KB			
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		Sandra Colvard	Catch and Release for Wild Steelhead in Southern Oregon	Sat 11/27/2021 1:...	49 KB			
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Sunday								
		John Mullen	Take Action: Conserve Wild Fish on Oregon's South Coast	Sun 11/28/2021 9...	49 KB			
		Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is						
		Alan LHomme...	Catch and Release for Wild Steelhead in Southern Oregon	Sun 11/28/2021 1...	49 KB			
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     FromSubjectReceivedSizeCategoriesMention					
Brian cowan Catch and Release for Wild Steelhead in Southern Oregon Sun 11/28/2021 1... 48 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Katherine Chew Take Action: Conserve Wild Fish on Oregon’s South Coast Sun 11/28/2021 1... 50 KB Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is					
Rachel Loui Catch and Release for Wild Steelhead in Southern Oregon Sun 11/28/2021 6... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Monday					
Jesse Robbins Take Action: Conserve Wild Fish on Oregon’s South Coast Mon 11/29/2021 ... 49 KB Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is					
Jesse Robbins Catch and Release for Wild Steelhead in Southern Oregon Mon 11/29/2021 ... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Abby Holmstr... Take Action: Conserve Wild Fish on Oregon’s South Coast Mon 11/29/2021 ... 51 KB Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is					
Landon Mace RSP Final Draft Comments Mon 11/29/2021 ... 52 KB Dear Chair Wahl, Hello, Chair Wahl.					
Tracey Reed Catch and Release for Wild Steelhead in Southern Oregon Mon 11/29/2021 ... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Yuka Hollinsw... Take Action: Conserve Wild Fish on Oregon’s South Coast Mon 11/29/2021 ... 49 KB Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is					
Kyra Rice Take Action: Conserve Wild Fish on Oregon’s South Coast Mon 11/29/2021 ... 51 KB Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is					
Lee Parks Take Action: Conserve Wild Fish on Oregon’s South Coast Mon 11/29/2021 ... 49 KB Dear ODFW Comission, Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Southwest Oregon is					
Alec Underwo... RSP Final Draft Comments Mon 11/29/2021 ... 51 KB Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management					
Stephen Day RSP Final Draft Comments Mon 11/29/2021 ... 48 KB Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management					
Adam Mannelin Catch and Release for Wild Steelhead in Southern Oregon Mon 11/29/2021 ... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Donna Sheinb... Please require Catch and Release for Wild Steelhead Mon 11/29/2021 ... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Aiden Jenner Catch and Release for Wild Steelhead in Southern Oregon Mon 11/29/2021 ... 50 KB Dear Oregon Department of Fish and Wildlife, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Daniel Seiler Catch and Release for Wild Steelhead in Southern Oregon Mon 11/29/2021 ... 48 KB To whom it may concern, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species Conservation Management					
Yesterday					
Andrew Marx Catch and Release for Wild Steelhead in Southern Oregon Tue 11/30/2021 5... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Stephen Maher Catch and Release for Wild Steelhead in Southern Oregon Tue 11/30/2021 1... 50 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Dana Hergert Catch and Release for Wild Steelhead in Southern Oregon Tue 11/30/2021 1... 49 KB Dear Chair Wahl and ODFW Commission, Thank you for the opportunity to provide comments to the Commission on the October draft of the Rogue South Coast Multi-Species					
Chris Moore RSP Final Draft Comments Tue 11/30/2021 1... 48 KB Dear Chair Wahl, I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management					

KINGSLEY Lisa M * ODFW

From: WADE BURLESON <pwosprey@gmail.com>
Sent: Tuesday, November 30, 2021 9:07 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Dear Chair Wahl,

I live on the North Umpqua River and I believe all the same catch and release rules should apply as any River in Oregon.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future.

Angling Alternatives

Thank you for directing the department to include a catch and release alternative in the final draft of the RSP at the October 25th Commission meeting. In response to the public draft of the RSP published in July, over 2250 people asked the department to implement catch and release regulations until there is adequate adult monitoring data available. Without current adult harvest monitoring, adult mortality, or adequate adult escapement for multiple generations, ODFW does not know the total impact of harvest on wild winter steelhead as a result of directed harvest and catch and release angling. I request the commission direct the department to change regulations to "Catch and Release" for wild winter steelhead on the Rogue and south coast until a five-year review of adequate monitoring data is available to inform harvest management.

Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation. The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

- Adult spawner escapement in each watershed
- Juvenile measurements correlated to adult escapement in each watershed
- Effects of harvest (mandatory reporting of all harvest and catch and release)
- Effects of hatcheries (pHOS)

Hatchery Actions

The current RSP provides a suite of actions that increase hatchery expansion throughout the Rogue and south coast. I request that the department does not include any hatchery expansion in the RSP by making the following changes to the draft plan:

- Eliminate the newly proposed Euchre Creek and Winchuck River Mixed Emphasis Areas
- Eliminate offsite hatchery releases in the Rogue River
- Eliminate increased ESA listed Coho releases in the Rogue River
- Decrease smolt outputs to reach mitigation goals in the Rogue basin

I appreciate the opportunity to provide comment on the final draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

WADE BURLESON
624 Echo Dr
Roseburg, OR 97470
pwosprey@gmail.com

KINGSLEY Lisa M * ODFW

From: Ryan Delaney <ryanldelaney@gmail.com>
Sent: Tuesday, November 30, 2021 8:12 AM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Dear Chair Wahl,

My name's Ryan Delaney, I'm new to the Pacific Northwest, and I'm worried to see Oregon repeating the fisheries management mistakes made on the East Coast in the past. I'm from Virginia, where our shad run has been depleted from dam impacts and overfishing, and sincerely hope we have the collective wisdom and will to prevent this from happening to Oregon's steelhead.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future.

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I appreciate the opportunity to provide comment on the final draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Ryan Delaney
926 N 28th St
Boise, ID 83702
ryanldelaney@gmail.com

KINGSLEY Lisa M * ODFW

From: craig.zarling@everyactioncustom.com on behalf of Craig Zarling
<craig.zarling@everyactioncustom.com>
Sent: Thursday, November 25, 2021 9:18 AM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Dear ODFW Comission,

Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP)

As an Oregonian I see the protection of wild fish as an important value in itself but also a component of protecting our natural environment as a functional biological system. It is a heritage of the public that is now increasingly threatened. The RSP provides a concrete step in the protection of the earth that we need to get right.

In order to protect wild fish in the RSP, I ask the commission to vote for the following alternatives.

Hatchery Management

To minimize risks to the wild fish runs from hatchery fish, I support:

- Wild Fish Emphasis Areas only in Euchre Creek or Winchuck River.
- No permanent hatchery acclimation sites on the Rogue or Chetco Rivers.
- No increase from current hatchery releases numbers for any species in any basin.
- Reevaluation of the summer steelhead program and release targets at Cole Rivers hatchery.

Wild Winter Steelhead Harvest

Until adequate data has been collected and clearly shows that wild winter steelhead populations can be sustainably harvested, we should implement the following wild steelhead protocols:

- Catch-and-release for wild winter steelhead in all basins for a five-year interim period.
- Support for electronic licensing, steelhead validation card.
- Support increased hatchery daily bag limits in the Rogue, Chetco, and Elk Rivers to maintain angler opportunities.

Thank you for the opportunity to provide my comments to the commission. We urge commissioners to manage these precious resources cautiously until the critical data gaps are ameliorated. Our best chance to have thriving wild salmon and steelhead populations in the future, is to act now.

Sincerely,

Dr. Craig Zarling

612 SW Arboretum Cir Portland, OR 97221-2753 craig.zarling@comcast.net

KINGSLEY Lisa M * ODFW

From: fearlessw@everyactioncustom.com on behalf of William Huggins
<fearlessw@everyactioncustom.com>
Sent: Thursday, November 25, 2021 12:55 AM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Dear ODFW Commission,

I spend a great deal of time exploring and enjoying our wild public lands. I feel we must do all we can to safeguard the wild lands and wildlife that still remain. I worry that the expanding threat of climate change and habitat destruction will bring an end to many species that rely on healthy ecosystems to help them survive the warmer future that is coming, such as the salmon. We must do all we can to ensure that all life, including our own human ones, has a future.

So I thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP).

Southwest Oregon is home to beautiful, globally unique watersheds like the Rogue, Illinois, and Chetco Rivers. Productive habitats and wild fish runs power local economies and are an important part of Southwest Oregon communities. Due to low steelhead returns this year, we saw emergency fishing closures on the Deschutes, John Day, and North Umpqua Rivers. These closures caused considerable economic and recreational loss. We are committed to preventing this from occurring in the RSP area through precautionary management.

Key steps to safeguarding the region's wild fish—and the economies and communities that depend on them—include catch-and-release for wild winter steelhead during a five-year data collection period, robust population monitoring, and cautious management of wild fish emphasis areas.

Managing wild fish in a precautionary manner will not only help keep southern Oregon salmon and steelhead off the Endangered Species List, but will also set the region up to better withstand the climate shocks that we know are coming—and that, in some cases, are already here. The localized effects of climate change adds considerable uncertainty to our sense of how well these populations will adapt and survive in a warmer, dryer future. We must acknowledge that wild harvest, hatchery production, habitat loss/degradation, poor ocean conditions, and climate change all work synergistically, not in isolation, and are having detrimental effects on our already-depleted wild salmon and steelhead stocks.

Where sufficient data are unavailable to adequately determine the population health in each of the RSP basins, conservation should be prioritized over wild harvest opportunities.

In order to protect wild fish in the RSP, I ask the commission to vote for the following alternatives.

Hatchery Management

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- Wild Fish Emphasis Areas only in Euchre Creek or Winchuck River.
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Thank you for the opportunity to provide my comments to the commission. We urge commissioners to manage these precious resources cautiously until the critical data gaps are ameliorated. Our best chance to have thriving wild salmon and steelhead populations in the future, is to act now.

Sincerely,

Mr. William Huggins

430 Salzburg Ave Las Vegas, NV 89183-7223 feerlessw@cox.net

KINGSLEY Lisa M * ODFW

From: mintkeski@everyactioncustom.com on behalf of Walt Mintkeski
<mintkeski@everyactioncustom.com>
Sent: Tuesday, November 23, 2021 10:59 AM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Dear ODFW Commission,

I wish to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP).

Southwest Oregon has beautiful, globally unique watersheds like the Rogue, Illinois, and Chetco Rivers. Productive habitats and wild fish runs support local economies and are an important part of Southwest Oregon communities. Due to low steelhead returns this year, there were emergency fishing closures on the Deschutes, John Day, and North Umpqua Rivers. These closures caused considerable economic and recreational loss. I urge you to prevent this from occurring in the RSP area by instituting precautionary management.

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Thank you for the opportunity to provide my comments to the commission. I urge commissioners to manage these precious resources cautiously until the critical data gaps are ameliorated. Our best chance to have thriving wild salmon and steelhead populations in the future, is to act now.

Sincerely,

Mr. Walt Mintkeski

6815 SE 31st Ave Portland, OR 97202-8633 mintkeski@juno.com

KINGSLEY Lisa M * ODFW

From: hooppole@everyactioncustom.com on behalf of Jodi Rodar <hooppole@everyactioncustom.com>
Sent: Tuesday, November 23, 2021 10:29 AM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Dear ODFW Commission,

I am writing with deep concern and urgency, as you know Southwest Oregon is home to beautiful, globally unique watersheds like the Rogue, Illinois, and Chetco Rivers. Productive habitats and wild fish runs power local economies and are an important part of Southwest Oregon communities. Due to low steelhead returns this year, we saw emergency fishing closures on the Deschutes, John Day, and North Umpqua Rivers. These closures caused considerable economic and recreational loss. We are committed to preventing this from occurring in the RSP area through precautionary management.

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- Reevaluation of the summer steelhead program and release targets at Cole Rivers hatchery.

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Until adequate data has been collected and clearly shows that wild winter steelhead populations can be sustainably harvested, we should implement the following wild steelhead protocols:

- Catch-and-release for wild winter steelhead in all basins for a five-year interim period.
- Support for electronic licensing, steelhead validation card.
- Support increased hatchery daily bag limits in the Rogue, Chetco, and Elk Rivers to maintain angler opportunities.

Thank you for the opportunity to provide my comments to the commission. We urge commissioners to manage these precious resources cautiously until the critical data gaps are ameliorated. Our best chance to have thriving wild salmon and steelhead populations in the future, is to act now.

Sincerely,
Dr. Jodi Rodar
223 N Valley Rd Pelham, MA 01002-9770
hooppole@gmail.com

KINGSLEY Lisa M * ODFW

From: adaml81@everyactioncustom.com on behalf of Adam Lee <adaml81@everyactioncustom.com>
Sent: Tuesday, November 23, 2021 10:27 AM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Dear ODFW Commission,

Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP).

This part of the state is near and dear to my heart. I am a regular visitor to the Rogue river for recreational purposes, and protecting the river systems is a top priority for me.

Southwest Oregon is home to beautiful, globally unique watersheds like the Rogue, Illinois, and Chetco Rivers. Productive habitats and wild fish runs power local economies and are an important part of Southwest Oregon communities. Due to low steelhead returns this year, we saw emergency fishing closures on the Deschutes, John Day, and North Umpqua Rivers. These closures caused considerable economic and recreational loss. We are committed to preventing this from occurring in the RSP area through precautionary management.

Key steps to safeguarding the region's wild fish—and the economies and communities that depend on them—include catch-and-release for wild winter steelhead during a five-year data collection period, robust population monitoring, and cautious management of wild fish emphasis areas.

Managing wild fish in a precautionary manner will not only help keep southern Oregon salmon and steelhead off the Endangered Species List, but will also set the region up to better withstand the climate shocks that we know are coming—and that, in some cases, are already here. The localized effects of climate change adds considerable uncertainty to our sense of how well these populations will adapt and survive in a warmer, dryer future. We must acknowledge that wild harvest, hatchery production, habitat loss/degradation, poor ocean conditions, and climate change all work synergistically, not in isolation, and are having detrimental effects on our already-depleted wild salmon and steelhead stocks.

Where sufficient data are unavailable to adequately determine the population health in each of the RSP basins, conservation should be prioritized over wild harvest opportunities.

In order to protect wild fish in the RSP, I ask the commission to vote for the following alternatives.

Hatchery Management

To minimize risks to the wild fish runs from hatchery fish, I support:

- Wild Fish Emphasis Areas only in Euchre Creek or Winchuck River.
- No permanent hatchery acclimation sites on the Rogue or Chetco Rivers.
- No increase from current hatchery releases numbers for any species in any basin.
- Reevaluation of the summer steelhead program and release targets at Cole Rivers hatchery.

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Thank you for the opportunity to provide my comments to the commission. We urge commissioners to manage these precious resources cautiously until the critical data gaps are ameliorated. Our best chance to have thriving wild salmon and steelhead populations in the future, is to act now.

Sincerely,

Mr. Adam Lee

1508 SE Hickory St Portland, OR 97214-5347 adaml81@gmail.com

KINGSLEY Lisa M * ODFW

From: rnragain@everyactioncustom.com on behalf of Ramona Ponessa
<rnragain@everyactioncustom.com>
Sent: Tuesday, November 23, 2021 10:20 AM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Dear ODFW Comission,

Thank you for the opportunity to provide comments on the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). I live in Bandon and am personally interested in this having seen the decline in fish populations in the 23 years I have lived in this area.

Southwest Oregon is home to beautiful, globally unique watersheds like the Rogue, Illinois, and Chetco Rivers. Productive habitats and wild fish runs power local economies and are an important part of Southwest Oregon communities. Due to low steelhead returns this year, we saw emergency fishing closures on the Deschutes, John Day, and North Umpqua Rivers. These closures caused considerable economic and recreational loss. We are committed to preventing this from occurring in the RSP area through precautionary management.

Key steps to safeguarding the region's wild fish—and the economies and communities that depend on them—include catch-and-release for wild winter steelhead during a five-year data collection period, robust population monitoring, and cautious management of wild fish emphasis areas.

Managing wild fish in a precautionary manner will not only help keep southern Oregon salmon and steelhead off the Endangered Species List, but will also set the region up to better withstand the climate shocks that we know are coming—and that, in some cases, are already here. The localized effects of climate change adds considerable uncertainty to our sense of how well these populations will adapt and survive in a warmer, dryer future. We must acknowledge that wild harvest, hatchery production, habitat loss/degradation, poor ocean conditions, and climate change all work synergistically, not in isolation, and are having detrimental effects on our already-depleted wild salmon and steelhead stocks.

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Thank you for the opportunity to provide my comments to the commission. We urge commissioners to manage these precious resources cautiously until the critical data gaps are ameliorated. Our best chance to have thriving wild salmon and steelhead populations in the future, is to act now.

Sincerely,

Mrs. Ramona Ponessa

PO Box 2047 Bandon, OR 97411-2047

rnragain@gmail.com

KINGSLEY Lisa M * ODFW

From: cmiller927@everyactioncustom.com on behalf of Christine Miller <cmiller927@everyactioncustom.com>
Sent: Sunday, November 21, 2021 10:58 AM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Dear ODFW Commission,

I believe that it's our responsibility as stewards of this earth to protect all wild animals that are at our mercy, including wild fish, that are so critically important to their ecosystems. I believe that precautionary management is key to a healthy environment, rather than the hard and sometimes impossible work to bring back a species that is threatened with extinction.

Key steps to safeguarding the region's wild fish—and the economies and communities that depend on them—include catch-and-release for wild winter steelhead during a five-year data collection period, robust population monitoring, and cautious management of wild fish emphasis areas.

Managing wild fish in a precautionary manner will not only help keep southern Oregon salmon and steelhead off the Endangered Species List, but will also set the region up to better withstand the climate shocks that we know are coming—and that, in some cases, are already here. The localized effects of climate change adds considerable uncertainty to our sense of how well these populations will adapt and survive in a warmer, dryer future. We must acknowledge that wild harvest, hatchery production, habitat loss/degradation, poor ocean conditions, and climate change all work synergistically, not in isolation, and are having detrimental effects on our already-depleted wild salmon and steelhead stocks.

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Thank you for the opportunity to provide my comments to the commission. We urge commissioners to manage these precious resources cautiously until the critical data gaps are ameliorated. Our best chance to have thriving wild salmon and steelhead populations in the future, is to act now.

Sincerely,

Ms. Christine Miller

16905 Silver Pine Rd San Diego, CA 92127-2823 cmiller927@cox.net

KINGSLEY Lisa M * ODFW

From: Gary Koehler <garykoehler@nwi.net>
Sent: Friday, November 5, 2021 6:05 AM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

As a non-resident fly fisher in Oregon for the past decades, and resident of Washington where, like most Oregon rivers, we have lost or severely diminished our steelhead runs ODFW must be conservative in how Oregon's steelhead runs are managed. No longer can the states that host the vanishing runs of wild steelhead permit sportsman to harvest wild steelhead. All sportsman must rally to save our last wild runs of steelhead to help ensure that future generations of sportsman and those who cherish our wild heritage have opportunities to cast a fly or merely watch our iconic wild steelhead grace the pools of the Rogue River and other fabled streams of the Pacific Northwest. We must give our wild steelhead runs a chance for the future. We must do our part to enjoy our rivers wild runs of steelhead and bring to an end our incessant destruction of wild runs. All of us sportsman who revere our rivers and their wildness employ ODFW to stop the kill of wild steelhead and impose catch and release for the wild steelhead of Oregon.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

Angling Alternatives

In response to the public draft of the RSP published in July, over 2250 people asked the department to implement catch and release regulations until there is adequate adult monitoring. The Commission Draft, provided as Attachment 3 for Exhibit 3 of the October 15, 2021 Commission meeting, does not provide the commission with any alternatives for Angling opportunities and does not propose catch and release for wild steelhead. I am very concerned that the department did not listen to the public and did not take their comments into consideration. Without current adult harvest monitoring, adult mortality, or adequate adult escapement for multiple generations, ODFW does not know the total impact of harvest on wild winter steelhead as a result of directed harvest and catch and release angling. I request the commission direct the department to change regulations to "Catch and Release" for wild winter steelhead on the Rogue and south coast until a five-year review of adequate monitoring data is available to inform harvest management.

Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall

Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

- Adult spawner escapement in each watershed
- Juvenile measurements correlated to adult escapement in each watershed
- Effects of harvest (mandatory reporting of all harvest and catch and release)
- Effects of hatcheries (pHOS)

Hatchery Actions

The current RSP provides a suite of actions that increase hatchery expansion throughout the Rogue and south coast.

I request that the department does not include any hatchery expansion in the RSP by making the following changes to the draft plan:

- Eliminate the newly proposed Euchre Creek and Winchuck River Mixed Emphasis Areas
- Eliminate offsite hatchery releases in the Rogue River
- Eliminate increased ESA listed Coho releases in the Rogue River
- Decrease smolt outputs to reach mitigation goals in the Rogue basin

I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Gary Koehler
2218 Stephanie Brooke
Wenatchee, WA 98801
garykoehler@nwi.net

KINGSLEY Lisa M * ODFW

From: Ryan Rintala <ryanrintala03@gmail.com>
Sent: Wednesday, November 3, 2021 9:28 AM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

I've been lucky enough to encounter steelhead a handful of times in my life. I've put in over a hundred hours without catching one. These fish need to be protected.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

Angling Alternatives

In response to the public draft of the RSP published in July, over 2250 people asked the department to implement catch and release regulations until there is adequate adult monitoring. The Commission Draft, provided as Attachment 3 for Exhibit 3 of the October 15, 2021 Commission meeting, does not provide the commission with any alternatives for angling opportunities and does not propose catch and release for wild steelhead. I am very concerned that the department did not listen to the public and did not take their comments into consideration. Without current adult harvest monitoring, adult mortality, or adequate adult escapement for multiple generations, ODFW does not know the total impact of harvest on wild winter steelhead as a result of directed harvest and catch and release angling. I request the commission direct the department to change regulations to "Catch and Release" for wild winter steelhead on the Rogue and south coast until a five-year review of adequate monitoring data is available to inform harvest management.

Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

- Adult spawner escapement in each watershed
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- Effects of harvest (mandatory reporting of all harvest and catch and release)

- Effects of hatcheries (pHOS)

Hatchery Actions

The current RSP provides a suite of actions that increase hatchery expansion throughout the Rogue and south coast.

I request that the department does not include any hatchery expansion in the RSP by making the following changes to the draft plan:

- Eliminate the newly proposed Euchre Creek and Winchuck River Mixed Emphasis Areas
- Eliminate offsite hatchery releases in the Rogue River
- Eliminate increased ESA listed Coho releases in the Rogue River
- Decrease smolt outputs to reach mitigation goals in the Rogue basin

I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Ryan Rintala
200 Yellowstone Hall
Bozeman, MT 59715
ryanrintala03@gmail.com

KINGSLEY Lisa M * ODFW

From: Tim Manion <tmanion02@gmail.com>
Sent: Tuesday, November 2, 2021 4:30 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

The astounding thing about all this is the fact that there is absolutely no legitimate reason - NONE - for sport anglers to "harvest" this iconic, irreplaceable, magnificent wild animal in the face of undeniable falls in populations not only in Southern Oregon, but across the PNW.. The time has come - indeed, is long past - to acknowledge that our obligations overshadow our rights in a collapsing natural world desperate for our forbearance

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

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Hatchery Actions

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I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Tim Manion
206 221st Ave NE
Sammamish, WA 98074
tmanion02@gmail.com

KINGSLEY Lisa M * ODFW

From: Terry Sternberg <terry@tjstern.com>
Sent: Sunday, October 31, 2021 3:08 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

Please do not allow harvesting of wild steelhead. Given the extremely low returns along the Pacific Coast all the way to Alaska, every wild steelhead matters. At least wait until science proves it's ok to have a viable harvest program.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

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- Decrease smolt outputs to reach mitigation goals in the Rogue basin

I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Terry Sternberg
8 Monte Vista Ave
Larkspur, CA 94939
terry@tjstern.com

KINGSLEY Lisa M * ODFW

From: Douglas Rohn <user@votervoice.net>
Sent: Sunday, October 31, 2021 1:18 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

As a frequent steelhead angler of the Oregon coast, it seems that continuing to allow harvest of wild fish without data to support that management approach is, well, nonscientific. Let's collect some data and then make some decisions.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

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- Decrease smolt outputs to reach mitigation goals in the Rogue basin

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Sincerely,

Douglas Rohn
1858 Hunters Way
Bozeman, MT 59718
lymatic@me.com

KINGSLEY Lisa M * ODFW

From: Robert Hurley <reorosa1@comcast.net>
Sent: Sunday, October 31, 2021 11:30 AM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

Please consider a plan that allows only for catch and release of wild steelhead in the southern coastal region in order to manage our wild steelhead fisheries sustainably. More data is needed, including data on run size and escapement, population-specific harvest rates, and angling impacts to the most sensitive fish stocks, such as summer steelhead. ODFW does not currently have this data and the RSP provides no capacity or direction to generate, collect and review it.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

Angling Alternatives

In response to the public draft of the RSP published in July, over 2250 people asked the department to implement catch and release regulations until there is adequate adult monitoring. The Commission Draft, provided as Attachment 3 for Exhibit 3 of the October 15, 2021 Commission meeting, does not provide the commission with any alternatives for Angling opportunities and does not propose catch and release for wild steelhead. I am very concerned that the department did not listen to the public and did not take their comments into consideration. Without current adult harvest monitoring, adult mortality, or adequate adult escapement for multiple generations, ODFW does not know the total impact of harvest on wild winter steelhead as a result of directed harvest and catch and release angling. I request the commission direct the department to change regulations to "Catch and Release" for wild winter steelhead on the Rogue and south coast until a five-year review of adequate monitoring data is available to inform harvest management.

Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

- Adult spawner escapement in each watershed

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- Effects of hatcheries (pHOS)

Hatchery Actions

The current RSP provides a suite of actions that increase hatchery expansion throughout the Rogue and south coast.

I request that the department does not include any hatchery expansion in the RSP by making the following changes to the draft plan:

- Eliminate the newly proposed Euchre Creek and Winchuck River Mixed Emphasis Areas
- Eliminate offsite hatchery releases in the Rogue River
- Eliminate increased ESA listed Coho releases in the Rogue River
- Decrease smolt outputs to reach mitigation goals in the Rogue basin

I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Robert Hurley
6123 W Poplar St
Boise, ID 83704
reorosa1@comcast.net

KINGSLEY Lisa M * ODFW

From: Stanley Hayes <sshayes@bresnan.net>
Sent: Sunday, October 31, 2021 8:41 AM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

I have fished for steelhead in your state on the Trask River on the north coast. I was lucky enough to catch both wild & hatchery fish, but there was no mistaking the identity of the wild fish. Their size, color, & fight was superior to the hatchery fish and I had no problem releasing them. In fact it was a joy seeing them swim away, knowing they might repeat the cycle another time. This should be the requirement for ALL of Oregon.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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Sincerely,

Stanley Hayes
3448 Congress St
Montrose, CO 81401
sshayes@bresnan.net

KINGSLEY Lisa M * ODFW

From: Charles A Ganske <caganske@gmail.com>
Sent: Saturday, October 30, 2021 10:11 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments in support of catch and release

Dear Chair Wahl,

I am not from southwest Oregon, and have only fished there once, but i am writing to support action that will prevent what has happened here in puget sound. I strongly support a catch and release fishery with mandatory hatchery harvest.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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Sincerely,

Charles A Ganske
1112 Austin St
Bellingham, WA 98229
caganske@gmail.com

KINGSLEY Lisa M * ODFW

From: Patricia Erdenberger <perdenberger@mac.com>
Sent: Saturday, October 30, 2021 9:34 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

Climate change is going to stress these stocks. We need to preserve the wild and catch and keep the hatchery fish.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

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I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Patricia Erdenberger
68549 E Birdie Ln
Welches, OR 97067
perdenberger@mac.com

KINGSLEY Lisa M * ODFW

From: Michael Drais <okiedokie33@gmail.com>
Sent: Saturday, October 30, 2021 7:50 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

Actually, I believe we should continue limited catch of wild spawning steelhead in Southern Oregon. I would also encourage the Commission to endorse broodstock programs and hatcheries as the ONLY method of restoring these fish populations given the seriously altered habitat following 150 + years of human degradation. It is also inaccurate to suggest that Southern Oregon is the only area where wild spawning steelhead are impacted by fisheries. The Commission chooses to turn its blind eye to the non-selective net fishing removal of endangered ESA protected steelhead in the Columbia. This net fishery is allowed to take wild steelhead even as the runs slide toward extinction.

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Sincerely,

Michael Drais
28632 HISTORIC COLUMBIA RIVER HWY
TROUTDALE, OR 97060
okiedokie33@gmail.com

KINGSLEY Lisa M * ODFW

From: Michael Mclean <mikemclean87@gmail.com>
Sent: Saturday, October 30, 2021 7:44 PM
To: COMMISSION ODFW * ODFW
Subject: Half harvest on wild steelhead in Southern Oregon

Dear Chair Wahl,

I think the northwest has plenty of examples to point to of rivers whose salmon and steelhead populations are barely hanging on for a huge variety of reasons. Climate change, habitat loss, Competition from hatchery, the list goes on and on. One of the easiest situations to correct and have meaningful positive impact on fish would be to stop allowing harvest on the few wild fish that remain. Let's stop repeating the mistakes of the past which have led to series declines, in order to appease a small number of anglers.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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Sincerely,

Michael Mclean
5500 NE Sandycrest Ter
Portland, OR 97213
mikemclean87@gmail.com

KINGSLEY Lisa M * ODFW

From: Frank Kaneko <wildfish.fk@gmail.com>
Sent: Saturday, October 30, 2021 4:07 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

I fish for steelhead in the Smith River in California, the sister river to your Chetco River. It pains me that across the border, you can kill a wild steelhead whereas in California we are not allowed to kill any wild steelhead. Please consider a no kill regulation for wild steelhead and impose only taking of hatchery raised steelhead instead. Take the time to actually see the beauty of wild steelhead fresh from the ocean. I Call them silver bullets for how they look and take off when they are hooked. They are a treasure to be saved.

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Sincerely,

Frank Kaneko
612 Montezuma Ct
Walnut Creek, CA 94598
wildfish.fk@gmail.com

KINGSLEY Lisa M * ODFW

From: Harrison Hilbert <hshilbert1@gmail.com>
Sent: Saturday, October 30, 2021 3:42 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

Climate change, low fish returns, habitat loss, over harvest & poor ocean factors influencing wild steelhead numbers. Stop harvesting wild fish on Oregon south coast rivers."

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

Angling Alternatives

In response to the public draft of the RSP published in July, over 2250 people asked the department to implement catch and release regulations until there is adequate adult monitoring. The Commission Draft, provided as Attachment 3 for Exhibit 3 of the October 15, 2021 Commission meeting, does not provide the commission with any alternatives for Angling opportunities and does not propose catch and release for wild steelhead. I am very concerned that the department did not listen to the public and did not take their comments into consideration. Without current adult harvest monitoring, adult mortality, or adequate adult escapement for multiple generations, ODFW does not know the total impact of harvest on wild winter steelhead as a result of directed harvest and catch and release angling. I request the commission direct the department to change regulations to "Catch and Release" for wild winter steelhead on the Rogue and south coast until a five-year review of adequate monitoring data is available to inform harvest management.

Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

- Adult spawner escapement in each watershed
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- Effects of hatcheries (pHOS)

Hatchery Actions

The current RSP provides a suite of actions that increase hatchery expansion throughout the Rogue and south coast.

I request that the department does not include any hatchery expansion in the RSP by making the following changes to the draft plan:

- Eliminate the newly proposed Euchre Creek and Winchuck River Mixed Emphasis Areas
- Eliminate offsite hatchery releases in the Rogue River
- Eliminate increased ESA listed Coho releases in the Rogue River
- Decrease smolt outputs to reach mitigation goals in the Rogue basin

I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Harrison Hilbert
PO Box 714
Pocatello, ID 83204
hshilbert1@gmail.com

KINGSLEY Lisa M * ODFW

From: Steven Goldberg <user@votervoice.net>
Sent: Saturday, October 30, 2021 3:24 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

ODFW should follow the best scientific data and evaluation. In the absence of scientific data, ODFW should not allow the harvesting of wild anadromous fish from Oregon coastal riverine waters.

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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Management Triggers and Actions

The conservation status for all species has been indicated in the plan. The conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency that successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. I ask that the department utilize adult spawner escapement from newly instated south coast spawning surveys after five years of plan implementation.

The conservation triggers in the draft RSP don't respond quickly enough to fish population decline. The Commission Draft RSP states action will be taken when a two year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. Second, the plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

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- Decrease smolt outputs to reach mitigation goals in the Rogue basin

I appreciate the opportunity to provide comment on the October draft of the RSP. I urge you to take a cautious management approach in a time when climate change makes it extremely difficult to predict trends in abundance and productivity. For wild steelhead to persist in numbers that can support fisheries in the future, a management approach that is informed by accurate and timely data needs to be taken. This type of management will sustain the long-term health of wild steelhead. Thank you for your time and consideration.

Sincerely,

Steven Goldberg
1638 NW Wild Rye Cir
Bend, OR 97703
baetis1@me.com

KINGSLEY Lisa M * ODFW

From: Wil Wilkins, Wil <wilkins.wil@gmail.com>
Sent: Saturday, October 30, 2021 2:52 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

Please implement Catch & Release ONLY
for Wild Steelhead,, in All waters you govern,,,

They need a Fighting Chance,,, and I do know about Fighting.

Not much at letter writin ,, but I hope ya get the just of the Request,,,,,

Many Thanks
Wil Wilkins DAV

I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan (RSP). The RSP will dictate the management direction for many ecologically important steelhead waters, such as the Sixes, Coquille, Elk, and Rogue Rivers. A plan that prioritizes the long-term health of wild steelhead is necessary when the future is more uncertain than ever due to the impacts of climate change. I encourage you to strongly consider the following comments and suggested changes, as they are provided with the goal of restoring and sustaining wild steelhead abundance in the future. Given the outpouring support for catch and release regulations during the public comment period, I am concerned the department has fallen short in their duty to consider public comments and has failed to adequately inform the commission of the discussion around the following alternatives and actions.

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Chinook SMU Conservation Management plan, e.g. angling regulation changes, hatchery program changes, and habitat action changes.

Lastly, I request ODFW provide the following fundamental data on population health to manage species indicated in the plan:

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Sincerely,

Wil Wilkins
5108 US Highway 93 S
Conner, MT 59827
wilkins.wil@gmail.com

KINGSLEY Lisa M * ODFW

From: Paul Doty <user@votervoice.net>
Sent: Saturday, October 30, 2021 2:47 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Comments

Dear Chair Wahl,

Please don't allow the harvest of any wild steelhead in continental US.

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Sincerely,

Paul Doty
110 Haahaa St
Makawao, HI 96768
pauldoty26@yahoo.com.au