

Exhibit (B)

**Supplemental #3
Public Correspondence
received as of
December 15, 2021**

KINGSLEY Lisa M * ODFW

From: Josh Reeves <jreeves@myfrontiermail.com>
Sent: Monday, December 13, 2021 9:00 PM
To: COMMISSION ODFW * ODFW
Subject: Wild Fish Harvest, Hatchery programs

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it may Concern:

I have been a resident in Oregon for over 40 years. I am an avid Hunter and Fisherman. I have participated in many fisheries throughout the State, most being on the South Coast. I have a fish bearing stream that runs through my property that wild Coho Salmon and Sea run Cutthroat Trout spawn in and spend the first parts of their life cycle in.

I'm writing to share my opinion on Wild Fish harvest, as well as hatchery programs. Both of these are essential for the survival of ODFW and the Species of fish that this pertains to.

Catching and eating fish is, and has been an important way of life for centuries. It is a cultural activity for many Coastal Oregonians past down from generation to generation. The fisheries for these Wild fish species are not decimating our fish populations. As many harvest opportunities for these fish as possible should be allowed. It will keep Oregonians interested in fishing and keep license dollars coming in. It will also sustain and stimulate local economies. It will also keep fishermen interested in volunteering to help with habitat restoration projects and other conservation programs aimed at helping fish.

As far as hatchery programs are concerned, the only thing that the Commission should be discussing is how much more can they increase Hatchery production of local fish populations to sustain the fisheries they support and keep them robust. Keeping all existing Hatcheries running and looking to add more programs, such as hatc and eyed egg incubators is the step you should consider. Hatcheries are not a bad thing!!

Please take this into consideration.

Respectfully,

Josh Reeves
94708 Rhody Hill LN
North Bend, OR 97459

Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Mr. & Mrs. Jeffrey Wiser <jwise224@gmail.com>
Sent: Tuesday, December 14, 2021 1:23 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

I was born in Oregon. This is home for me. I've lived in other states, but none such as great as this one and it pulled me back strongly. Part of this state's pull is the the opportunity to experience the best of what this one planet has to offer, including the chance to chase some marvelous fish in marvelous places.

Our wild steelhead are rare, not just in Oregon, but in the world. On the one and only planet that has steelhead, ours stand out as a rare treasure. These wild fish represent the best of what this state has to offer and they generate millions in economic benefits. Killing them, when there's already a robust, taxpayer-funded alternative, makes no sense.

This happens to be an instance where folks can have it both ways; rare in today's world. There are hatchery fish to kill and eat. There are wild fish to catch and release. Something for everyone. Amazing!

Especially in an instance when little is known about the health of these wild stocks, killing them (when, again, there's an alternative for harvest already funded and in place) is shortsighted at best. I am begging you: please preserve this rare resource in the Rogue-South Coast SMU. There's virtually nothing to gain and so much to lose, something that cannot be replaced. It's something that makes this state what it is, what makes this planet what it is. Protect wild fish in the Rogue-South Coast SMU. Future generations will thank you.

Thank you,

Jeff Wiser

Sincerely,

Jeffrey Wiser
4211 SE 48th Ave
Portland, OR 97206
jwise224@gmail.com

KINGSLEY Lisa M * ODFW

From: Sunny Capper <sunny.bourdon@gmail.com>
Sent: Tuesday, December 14, 2021 1:30 PM
To: COMMISSION ODFW * ODFW
Subject: Southern Oregon Testimony

Follow Up Flag: Follow up
Flag Status: Flagged

Greetings,

As I am unable to verbally testify at the upcoming Commission meeting I would like to show my support for Alternative 2, Catch and Release of Wild Steelhead, as part of the Rogue South Coast Conservation Management Plan. As an angler, river advocate, mother and lifelong resident I am in support of proceeding cautiously in regards to the future of wild steelhead populations. Without adequate monitoring and robust data, it is prudent to adopt Catch and Release regulations on the South Coast.

Thank you,
Sunny Capper
Brookings, OR

KINGSLEY Lisa M * ODFW

From: TRACY ALLEN <advangler@yahoo.com>
Sent: Tuesday, December 14, 2021 3:32 PM
To: COMMISSION ODFW * ODFW
Subject: Wild Steelhead

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs, Please in act a catch and release law on wild steelhead in all Oregon waters. The future of Wild Steelhead are depending on this happing. Also since steelhead are on the ESA listings please in act a no bait law, so no bait would be all owed to be used for fishing for them. Thank you for your time. Tracy Allen

KINGSLEY Lisa M * ODFW

From: David Dedrick <daviddedrick5590@gmail.com>
Sent: Tuesday, December 14, 2021 4:42 PM
To: COMMISSION ODFW * ODFW
Subject: Wild Steelhead

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Commissioners

I strongly support new regulations to protect wild steelhead in Southern Oregon.

It is important to act sooner rather than later, and assure a full and Robust recovery of this Treasured fish.

People travel to our state to fish for wild steelhead for recreation, not harvest, adding millions to license fees and our local economy. Anglers whom wish to harvest steelhead have ample opportunity to do so with our hatchery fish. If in the future the wild steelhead population recovers to the point where minimum harvest regulations might be appropriate, then the regulations could be revised to allow for some retention of a wild fish. I urge you to act Now to prevent further reductions in our beloved wild steelhead returns

Thank you.

KINGSLEY Lisa M * ODFW

From: mark rockwell <mrockwell1945@gmail.com>
Sent: Tuesday, December 14, 2021 4:57 PM
To: COMMISSION ODFW * ODFW
Subject: Letter supporting Alternative 2, Catch & Release of all wild winter steelhead
Attachments: Wild Winter Steelhead, Southern Oregon, 12112021.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

ODFW Commission staff: Please distribute the attached letter to all Commission members prior to this week's meeting. Thank you.
Mark Rockwell

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Dr. Mark Rockwell, D.C.
President & VP Conservation,
Northern Calif. Council,
Fly Fishers International
5033 Yapple Ave.
Santa Barbara, CA 93111
mrockwell1945@gmail.com
530 559-5759 (cell)

NORTHERN CALIFORNIA COUNCIL



Date: December 11, 2022

To: Oregon Department of Fish & Wildlife Commission.
4034 Fairview Industrial Drive SE Salem, OR 97302

Sent via electronic transmission: ODFW.Commission@odfw.oregon.gov

Subject: "Rogue South Coast Multi-species Conservation Management Plan, (RSP). **Recommending Alternative 2 - Catch & Release of all wild winter steelhead in the Southern Region, Oregon.**

Dear Chair Wahl, Commissioners, and Director Melcher:

I write representing the Northern California Council, Fly Fishers International, our 23 Fly Fishing Clubs in Northern California from Fresno to the Oregon Border, and all of Northern Nevada. We have approximately 7,000 club members in our region, and most of them fish in Oregon for trout, salmon & steelhead. Winter steelhead fishing in Southern Oregon is a most prized activity for many of our members, and multiple trips per year are common. In essence, fishing in Oregon is an important activity of our members and a staple of our annual activities, with winter steelhead the major focus of our members from December to March each year.

We are very concerned about the continued existence of winter steelhead in the Southern Oregon region. Those who have fished southern Oregon over the past 5+ years report a declining catch rate, even while spending more time fishing than in years past. The last 2 years have been the worst in memory, with many days spent and many trips ending in zero hook-ups. It is clear to us that something is wrong, and a change in management of these precious fish is needed if these fish are to survive and be viable in the years ahead.

We strongly recommend the Commission approve Alternative 2 - catch & release of all wild winter steelhead in the Southern Oregon Region. We do so for the following reasons:

- Catch and release for wild steelhead will not eliminate harvest opportunity; harvest of hatchery steelhead will still be available.
- 89% of wild harvest occurs in the Rogue and Chetco River's; both of these rivers have thousands of hatchery fish for harvest opportunities.
- No population estimates for adult steelhead for the middle and lower Rogue, Illinois, Applegate, or any south coast watersheds.
- No current estimate of harvest rate or overall mortality in Rogue or south coast. Idaho observes a 5% catch and release mortality rate and Washington uses an 10% catch and release mortality rate. Oregon does not observe a catch and release mortality rate nor is it included in this plan.

TM

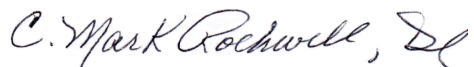
FLY FISHERS INTERNATIONAL
Conserving - Restoring - Educating Through Fly Fishing

- Proposed monitoring does not commit to obtaining or using adult population estimates or escapement goals for Rogue or south coast.
- No Adult spawning surveys were conducted in the Rogue Basin this year.
- Catch and release will continue to allow opportunities to fish without closing down the sport fishery.
- Percent Hatchery Fish on Spawning Grounds is unknown (pHOS).
- Offsite hatchery releases are being proposed in the plan.

Over the past 5 years we have worked with the California Dept. of Fish & Wildlife to create a Fisheries Monitoring Plan on the Smith River. In that plan DIDSON sonar counting is being done to understand the annual influx of mature winter steelhead. We would suggest ODFW consider such an effort to create a better scientific understanding of the wild steelhead spawning populations and to use this data to help manage the fishery in a responsible way. Without good, reliable data the fishery cannot be managed responsibly, and knowing year after year the incoming spawning adult population can provide reliable data upon which good decision making can be based.

Thank you for the opportunity to make comment on the management of this important population of wild winter steelhead. Again, We support Alternative 2 - catch & release of all wild winter steelhead in the Southern Oregon region of Oregon.

Sincerely,



Dr. C. Mark Rockwell, D.C.
President, Nor Cal Council, Fly Fishers International
mrockwell1945@gmail.com

KINGSLEY Lisa M * ODFW

From: Evan Hughes <evanh73@gmail.com>
Sent: Tuesday, December 14, 2021 5:10 PM
To: COMMISSION ODFW * ODFW
Subject: Wild Steelhead Harvest

Follow Up Flag: Follow up
Flag Status: Flagged

I think it's time to end the retention of native steelhead. Oregon is the last state to allow harvest, and we do not know if we have enough returning fish to sustain this practice. Protecting the fish brings fishermen and their dollars to our state.

Thank you,
Evan Hughes
Eugene OR
Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Sure Reilly <reilly.susan14@gmail.com>
Sent: Tuesday, December 14, 2021 5:48 PM
To: ODFW RSP.Comments * ODFW
Subject: Rogue South Coast Multi-Species Plan - Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

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,
Sure Reilly
reilly.susan14@gmail.com 07825

KINGSLEY Lisa M * ODFW

From: Robert Gentry <driftboater1@gmail.com>
Sent: Tuesday, December 14, 2021 6:03 PM
To: COMMISSION ODFW * ODFW
Subject: Support for Alternative 2

Follow Up Flag: Follow up
Flag Status: Flagged

My Name is Robert Gentry and I support Alternative 2, catch and release for wild winter steelhead. Please do not pass up this opportunity to do the right thing for wild steelhead. We are use to this type of regulation and welcome the change and hope for the future.

Thank you,

Robert

Robert Gentry
Redmond, Oregon

KINGSLEY Lisa M * ODFW

From: Andy Archer <andycarcher@gmail.com>
Sent: Tuesday, December 14, 2021 6:27 PM
To: COMMISSION ODFW * ODFW
Subject: Andrew Archer - Support for Alt 2, catch and release for wild winter steelhead

Follow Up Flag: Follow up
Flag Status: Flagged

Chair Wahl, Commissioners, and Director Melcher,

My name is Andrew Archer, and I live in Ashland, Oregon. I am a recreational steelhead fly fisherman who practices catch and release in the Rogue and South Coast watersheds. I frequent these rivers during the winter months—buying supplies in the local communities, eating at their restaurants, staying in their hotels. I make a point of picking up litter every time I am on one of these rivers, to leave it a better place than I found it for the next angler to enjoy.

I also work for a local company in Ashland called Fly Water Travel. It is a company that serves as a booking agency for fly fishing destinations around the globe, including the Rogue and South Coast watersheds. This portion of our business, my job, and the guides that we work with in this zone, rely on returns of wild steelhead to stay in business and feed their families.

I book dozens of clients to fly fish these rivers for wild steelhead every season. Each of these clients stay in local hotels, eat at local restaurants, and inject their money into the local economy in a variety of other ways. I can say with confidence that the thing that keeps these guests coming back year after year is the potential to catch and release a wild winter steelhead.

I am concerned about winter steelhead in southern Oregon because even in my short life experience, I have seen the decline unfolding before my eyes. Nowadays, whenever I am on the river, I ask myself: will my future children know what a wild steelhead is?

The October draft of the Rogue South Coast Conservation Management Plan proposes wild steelhead harvest without adequate population estimates, harvest rates, or overall population mortality. The current draft contains far too much uncertainty and implements excessive risk to wild steelhead in southern Oregon.

Why are we willing to risk something so fragile without the appropriate data available?

I request that the commission direct the department to adopt catch and release regulations until adequate adult monitoring is in place. Management actions should be dependent on adult population estimates, escapement goals, and expected fisheries mortality of wild winter steelhead. This necessary action will help ensure that we have abundant wild steelhead in Southern Oregon for years to come.

Thank you,

Andrew Archer

From: bryan huskey <Bryan.Huskey@outlook.com>
Sent: Tuesday, December 14, 2021 8:17 PM
To: COMMISSION ODFW * ODFW
Subject: Release Wild Steelhead

Follow Up Flag: Follow up
Flag Status: Flagged

In 1985 from the banks of the Trask River I caught my first Steelhead. I'll never forget it was a "chrome 8 pounder" since I had just turned 8 years old. Of course we kept it and ate it. Of course it was wild, they all were back then.

Salmon and steelhead my dad caught from local rivers and bays were a sizable part of our family diet, and perhaps that's why I've loved and revered wild fish and all their counterparts my entire life.

In 2000 I made Boise my home, and for many years traveled back to fish my original home waters. But priding myself as something of a keenly observant outdoorsman, I eventually saw the writing on the wall.

I stopped driving to any imaginable Oregon steelhead river, spending hard-earned credit card money on food, lodging, tackle, licenses, gas and whisky (the kind in plastic bottles). Its been like 5 years now, and I want to go back. But for what?

How bad is it that we've allowed fish returns to dwindle to the point that die-hard anglers and self-respecting career guides feel filthy with guilt targeting the remaining fish? And then if that's not bad enough- we have to argue over reality with the agencies entrusted with their management? Because some people want to keep killing them? For sport?!

At what point are we going to unite as simple folks who just love to touch chrome bright coastal steelhead and ask ourselves "What the fak are we doing to this entire species? And for who?!"

Thanks for reading, and coming along.

Bryan Huskey

Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Henry Roller <henry.j.roller@gmail.com>
Sent: Tuesday, December 14, 2021 11:05 PM
To: COMMISSION ODFW * ODFW
Subject: Catch and Release Regulations for Wild Steelhead

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

I am writing today about a topic that is very important to me: protecting wild fish populations.

I would like to leave a comment about the October draft of the Rogue South Coast Multi-Species Conservation Management Plan.

I believe that catch and release regulations should be put in place in the Rogue and South Coast. We should not risk further lowering wild fish populations. Please develop an approach for the long term conservation of these fish.

Sincerely,
Henry Roller

KINGSLEY Lisa M * ODFW

From: Peter Alandt <peteralandt@hotmail.com>
Sent: Wednesday, December 15, 2021 5:52 AM
To: COMMISSION ODFW * ODFW
Subject: Wild winter steelhead

Follow Up Flag: Follow up
Flag Status: Flagged

My Name is Peter Alandt and I support Alternative 2, catch and release for wild winter steelhead

Peter Alandt BSN, RN HNB-BC
832.656.4333

KINGSLEY Lisa M * ODFW

From: Jim Ray <steelhd32@yahoo.com>
Sent: Wednesday, December 15, 2021 6:08 AM
To: COMMISSION ODFW * ODFW
Subject: Wild steelhead regulations

Follow Up Flag: Follow up
Flag Status: Flagged

To the Commissioners:

Please protect the wild steelhead. In view of the continued population declines, it is beyond comprehension why it could be acceptable to retain wild steelhead through recreational or commercial fishing.

Sincerely,

James C Ray

[Sent from Yahoo Mail for iPad](#)

KINGSLEY Lisa M * ODFW

From: LiAnne Summer <lianne.coon@gmail.com>
Sent: Wednesday, December 15, 2021 10:11 AM
To: COMMISSION ODFW * ODFW
Subject: Stop the killing of steelhead

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair and committee,

I am writing as an advocate and fellow fisherwoman from Maui. I went to school in Portland and have many family friends that live there still. Our future generation deserves to see a better world than what we have now—keeping the delicate steelhead species alive and prospering is a huge part of making that happen. Please stop the catch and kill method fishermen are being allowed to do. Please only allow catch and release. Killing steelhead has such a huge impact on the Deschutes fragile ecosystem.

Thank you for your kind and thoughtful consideration on this serious matter.

With Aloha,
LiAnne (Coon) Driessen
808-283-3810
Sailtrilogy.com

Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Riad Nasr <riadnasr@gmail.com>
Sent: Wednesday, December 15, 2021 9:56 AM
To: COMMISSION ODFW * ODFW
Subject: Wild Steelhead

Follow Up Flag: Follow up
Flag Status: Flagged

Please for the love of all
Stop the killing and harvest of wild steelhead, it's the only chance we have of saving the resource

Thank you

Technology

KINGSLEY Lisa M * ODFW

From: nate turner <nate@skookumoutfitters.com>
Sent: Wednesday, December 15, 2021 10:42 AM
To: COMMISSION ODFW * ODFW
Subject: END WILD STEELHEAD HARVEST NOW.

Follow Up Flag: Follow up
Flag Status: Flagged

Chair Wahl and ODFW Commissioners,

I am writing to voice my concerns regarding the upcoming ODFW fish commission meeting to discuss the South Coast Management Plan. My concern is that you and the commissioners will decide to continue allowing wild steelhead harvest, specifically in the rivers included in the South Coast Management area. My sincere recommendation is that you and the commissioners **end** wild steelhead harvest in the South Coast Management area. Period. Further, wild steelhead harvest anywhere, anytime in the state of Oregon should be **banned** for the foreseeable future. Period.

I've spent my life in this state. I was raised in a logging and ranching family. I know what hangs in the balance here. I'm a catch and release fishing guide with 21 years experience, targeting everything from smallmouth bass and carp in the Columbia River to steelhead and salmon in multiple rivers around the state. My small business supports my wife and two young children. My business suffered greatly in the wake of the steelhead closures on the Lower Deschutes this summer. Closures which, in my opinion, did *nothing* to actually protect adult steelhead as they fell to gill nets in the Columbia and fishermen in the lower 30 miles of the Deschutes claiming that they were targeting salmon. This, in combination with deplorable water conditions resulting from mismanagement at the Round Butte and Pelton Dams facilities may truly prove to be the nail in the coffin for steelhead runs in the Lower Deschutes. There should be federal assistance made available for folks in my line of work who are experiencing similar situations as myself and my family.

In this same vein, we can all agree that there is zero empirical evidence to support the harvest of wild steelhead *anywhere*. It's simply greed. ODFW fisheries biologists cannot determine how many wild steelhead will actually return to our coastal streams each year. What we do know of wild steelhead returns, we learn from the men and women who are out there trying to catch them. The last couple of years have been extremely tough on the coast. Not to mention the fishing pressure has been at an all time high.

Why is Oregon so far behind the curve when it comes to wild steelhead management? Every river in this state that supports a wild steelhead fishery must be protected by catch and release regulations. Further, spawning tributaries must be closed to ALL fishing during spawning seasons to allow the few remaining wild steelhead a chance to successfully spawn. Listen to the anglers who understand the big picture. Help my family out. Give my young kids the opportunity to catch and release wild steelhead when they're my age. This is not a hard decision.

Sincerely,

Nate Turner
Skookum Outfitters

KINGSLEY Lisa M * ODFW

From: Brandon Prowse <bipperdo@yahoo.com>
Sent: Wednesday, December 15, 2021 11:57 AM
To: COMMISSION ODFW * ODFW
Subject: Catch and Release for Wild Steelhead State Wide

Follow Up Flag: Follow up
Flag Status: Flagged

My name is Brandon Prowse and I would like to voice my encouragement for the end of all wild steelhead harvesting statewide. The fact that the Columbia River basin had the lowest return of steelhead in history this year should make this decision a no brainer. Ending harvest of steelhead would at least give these incredible creatures a better chance to survive for generations to come.

PACIFIC SPRING LLC
PAC HILL LLP / TAYLOR PACIFIC LLP/ARBOR SUNSHINE LLC
Charles S. Lilley
President/ Managing General Partner
520 SW Yamhill Suit 510 Portland, Oregon 97204
Phone (503) 225-0755 Cell (503)860-7575 FAX (503) 225-0216

Good Morning;

My name is Charles S Lilley, native Oregonian, business and property owner, former officer and board member of Oregon Wildlife Heritage Foundation, outdoorsman, fisherman, father, and grandfather.

I have been a Steelhead fisherman for nearly 60 years. Fished for Steelhead from Northern California, Oregon, Washington, up to, and extensively throughout British Columbia, Canada.

I am testifying today in the hope that the Oregon Department of Fish and Wildlife will recognize the significance and biological importance of healthy Native runs of Steelhead in our rivers and once and for all end the practice, and current proposal permitting the taking of Native Steelhead in the State of Oregon.

The notion that the taking of Native Steelhead, or any native fish, is inexcusable, based on the ill-conceived notion that native genetic diversity and preservation is insignificant, coupled with the flawed belief that hatcheries are the answer after irreplaceable damage has been done is not only irresponsible, but unacceptable, to present, and future generations of Oregonians.

Over the years I have witnessed firsthand the decline in Native Steelhead populations, the result of hatchery augmentation, mitigation, enhancement practices, and deleterious consequences on native anadromous fish populations. The vain attempt by hatcheries to reverse damage resulting from poor legislation and regulatory practices have both been proven expensive and ineffective in reversing the loss of millions of years of evolution.

Why now, after nearly 60 years of my life wading rivers, are we no further along today in recognizing and learning from the painful lessons of history.

What is the argument, selling fishing licenses permitting the killing of a native fish? What conceivable economic model is used that justifies removing millions of years of native genetic material from a river? Are Native Steelhead an inconsequential species, deemed replaceable? What science justifies this callous and irresponsible decision?

It only stands to reason, and I believe within the mission statement of the ODFW, that healthy Native Steelhead runs should be embraced and focus of the ODFW, yet here we are today discussing the taking of Native Steelhead, because of “forecasted” run numbers, or some scientists interpretation of what is sustainable? Maybe these same scientists and mathematicians should take a look at how these same practices and projections worked on British Columbia’s interior Fraser Steelhead populations.

The proposed taking of Native Steelhead stands in direct contradiction to the practices and regulations in place on the North Oregon Coast, Inland Rivers, Snake, and Columbia system.

The taking of native Steelhead in California, Oregon, Washington, Idaho, and British Columbia are prohibited yet here we stand today entertaining the reversal of these regulations to accommodate the Rogue River Fishery due to “forecasted” abundance?

The habitat, reclamation, restoration and enhancement work undertaken by concerned citizens, fisherman, and ODFW should be embraced and viewed as a step in the right direction not an excuse to take native fish.

My journey has taken me throughout the NW and Canada to fish for Steelhead with a fly, relish the opportunity to hook, sometimes land, what I consider the most challenging species, for the opportunity to let it continue on its journey.

I was raised by a man and his friends that instilled the belief it was all about the hunt, the challenge, opportunity, and sense of honor received in releasing a native fish unharmed, which I, my children, and their husbands continue to do, its tradition.

In closing there are rivers that need to be Hatchery Rivers, the native runs that once thrived are no more. When it becomes all about killing steelhead for numbers let them do so on artificially maintained hatchery rivers.

Thank you for this opportunity and time
Respectfully

CS Lilley

KINGSLEY Lisa M * ODFW

From: Shirley Hickman <hickmanse@hotmail.com>
Sent: Wednesday, December 15, 2021 12:04 PM
To: COMMISSION ODFW * ODFW
Subject: Alternative 2- Catch and Release

Follow Up Flag: Follow up
Flag Status: Flagged

Dear ODFW Commission,

My name is Shirley Hickman, and I support Alternative 2, "catch and release" only for wild steelhead. It must be done!

It is imperative that we as Oregonian's stand up and advocate for these iconic fish, their future destiny is in our hands, we can help them by ending the harvesting of wild steelhead in our state.

Their low decline has impacted the careers of outfitters and guides to such an extent there should be state assistance for the families. There has been devastating losses, financially, that has impacted many, due to the extreme low counts and warm waters.

Needless to say, strong action must be taken on the spawning tributaries, closing angling in these critical areas to allow spawning to take place.

Please take action NOW, today, before this species is lost forever. If we don't, we as Oregonians will regret the loss of this amazing fish and we will have nothing left but stories to tell our children of what once was. That indeed will be a sad day!

Sincerely,
Shirley Hickman

KINGSLEY Lisa M * ODFW

From: Tonn Cummins <tonnmcummins@gmail.com>
Sent: Wednesday, December 15, 2021 1:00 PM
To: COMMISSION ODFW * ODFW
Subject: Southern Oregon Wild Steelhead Management Concerns

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern I am writing to voice my opposition to wild steelhead harvest in Southern Oregon,

My name is Tonn Cummins and I am an avid angler as well as a guide in the Central Oregon region. I am writing to urgently voice my concerns of wild steelhead management in Southern Oregon.

There are currently nine streams where wild steelhead harvest is proposed to be allowed. It is my understanding that there is not an accurate population estimation or harvest estimation for steelhead in any of these waterways. I have always liked the saying that if you can't measure it you can't manage it.

I would like to point to the Olympic Peninsula (OP) in Washington state as an example. In some OP rivers the catch rate was over 100%, meaning that every steelhead in the system was caught and released more than once. This also means that if it wasn't for catch and release the population could potentially be fished to functional extinction in a single season. Without accurate information in these Southern Oregon waters the risk of allowing harvest is much too high. In my opinion if harvest of wild steelhead is allowed in these waters, it should be considered mismanagement.

I would also like to point out that there are excellent angling opportunities in Southern Oregon for anglers to target and keep hatchery steelhead. Studies are showing that wild steelhead genetics are important to the long term survival of the species. With declining steelhead numbers across the west coast of North America I believe now is the time to make a stand and protect these wild populations from harvest. If we don't make a stand now we may not have another chance. I strongly oppose the harvest of wild steelhead in Southern Oregon under the current conditions.

Thank you for your time
Best regards,
Tonn Cummins
(541)-401-9362

KINGSLEY Lisa M * ODFW

From: Chris Troxell <c_troxell@comcast.net>
Sent: Wednesday, December 15, 2021 1:18 PM
To: COMMISSION ODFW * ODFW
Subject: Rogue-South Coast Multi-Species Conservation and Management Plan

Follow Up Flag: Follow up
Flag Status: Flagged

My name is Chris Troxell and as somebody who loves chasing wild steelhead with a fly rod in my native state of Oregon, I whole-heartedly support Alternative 2, catch and release only for wild winter steelhead.

Thank you for your consideration in this important manner as we seem to be facing a reckoning with steelhead and I fear it will only get worse as we move into a warmer future. These fish need every chance they can get.

Sincerely,
Chris Troxell

Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Kirk Blaine <kirk@nativefishsociety.org>
Sent: Wednesday, December 15, 2021 1:22 PM
To: COMMISSION ODFW * ODFW
Subject: NFS Comments on RSP
Attachments: Native Fish Society Comments on Public RSP Draft July 2021 (1).pdf

Follow Up Flag: Follow up
Flag Status: Flagged

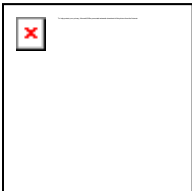
Chair Wahl and Commissioners,

Please accept the attached comments from Native Fish Society on the final draft of the Rogue South Coast Multi-Species Conservation Management Plan (RSP).

Please let me know if you have any questions.

Sincerely,
Kirk Blaine

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Kirk Blaine

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Rogue South Coast Multi-Species Conservation Management Plan Final Draft

Native Fish Society

Synopsis of NFS Comments and Recommendations

December 15, 2021

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December 15, 2021
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Rogue South Coast Plan - NFS Stakeholder Comments

Dear Tom Stahl, Chris Lorion, Steve Mazur, and Dan Van Dyke,

Thank you for the opportunity to comment regarding the second draft¹ of the Rogue South Coast Multi-species Conservation Management Plan (RSP) created by the Oregon Department of Fish and Wildlife (ODFW). Native Fish Society is a 501(c)(3) non-profit organization that is guided by the best available science and advocates for the recovery of wild, native fish and promotes the stewardship of the habitats that sustain us all.

Native Fish Society envisions a Rogue and south coast full of abundant wild fish, free flowing rivers, and thriving local communities. It is our hope that through our comments on the final draft management plan, adjustments will be made to provide a precautionary approach to fisheries management that incorporates accurate monitoring of identified species, clear management triggers and actions if species decline to conservation status, and responsible hatchery management practices that reflect the best available science. Wild fish are critical to the entire ecosystem of the RSP management area and provide economic and cultural value for the many rural communities in southwestern Oregon. With a 12 year timeline, it is critical that this plan set up our wild fish populations for success, especially in the face of a changing climate that will accelerate environmental stressors.

Despite our efforts for the past 150 years, each successive generation in the Pacific Northwest has inherited fewer fish and lesser fisheries. The few places that have bucked the region-wide downward trend have focused on protecting habitat, preventing overharvest, and avoiding hatchery programs - for example the Bristol Bay wild sockeye salmon fishery or wild winter steelhead in our own North Umpqua River. If we want to restore and pass along our fishing traditions to future generations, we must take unprecedented measures today to stem the challenges of climate change and the historical errors that have already put our wild stocks at

¹ Subsequent references in these comments to “the draft RSP” or “the draft” are in reference to the draft provided to the public in June of 2021.

risk. In Southwest Oregon, we cannot wait until wild Winter Steelhead are in crisis or listed on the Endangered Species Act before we take action. Characterizing the biological risk of overharvest to wild winter steelhead as a “social choice” is greatly misleading. We know from countless occurrences that poorly monitored and regulated fisheries can have a deleterious effect on population abundance, health and resilience. Already, the region’s famed wild Spring Chinook Salmon, Summer Steelhead, and Coho Salmon return at a fraction of their historical abundance impacting local fisheries and the future viability of these species. It is our worry that without precautionary management, wild steelhead will be listed as ESA threatened species and removed from state management in the next decade. Our goal is to avoid the harm that a federal listing would cause to local communities and our fishing economy.

Overall, this final draft of the RSP would expand the negative influence of hatchery fish through proposed additional Mixed Emphasis Areas, acclimation facilities and smolt increases. It would also increase the current risk from harvest on wild Winter Steelhead by sanctioning harvest rates in small and medium sized streams higher than estimated in Appendix I that were calculated in 2013.

We do not believe taking these additional risks are biologically justified by the best available science or the precautionary approach described in ODFW’s recently adopted Climate and Ocean Change Policy. For these reasons, we cannot support the hatchery or harvest actions outlined in this draft plan. Below we have provided comments with specific requests for alternative actions to appear in the next draft and be considered by the ODFW Commission for adoption.

1. *Status Assessment / Conservation Status* -

- a. ODFW assesses the status of species management units (SMUs) in the RSP based on viability risk category, confidence in results, and other risk factors. These SMU status categories are - Strong, Strong-Guarded, Sensitive, Sensitive-Critical, Threatened, and Endangered. In the draft plan, ODFW consistently, in the absence of current and confident data, ranks populations at a higher or more optimistic status. For example, Coastal Winter Steelhead proposed for a Strong-Guarded designation lack sufficient data to warrant the proposed designation. As stated in the draft RSP, “Abundance estimates have large confidence intervals (high uncertainty) in all years due to low survey effort. Estimates for 2009, 2011-12, and 2015 were excluded due to small sample size, very low precision, or both. Wild steelhead spawner estimates for populations are based on annual return for the stratum and the proportion of total stratum steelhead habitat (stream km) in each basin” (RSP Draft Appendix I Pg. 15). Additionally, risk from climate change was not discussed during the development of this section with stakeholders and it is unclear how climate risk factors into these status assessments. The Climate and Ocean Change Policy

(635–900–0015-(2)) states, “The Department should use appropriate analytic approaches to determine how species, biological communities, and habitats may respond to the changes in climate and ocean conditions on a time horizon that is relevant to a specific species’ life history.” Although the draft RSP outlines changes to climate and ocean for the Rogue and South Coast, the draft RSP does not correlate how these changes will affect the identified species in the plan. According to Wade et al, 2013, “median exposure of steelhead to increased temperatures during migration was greatest in the east Cascade and southern [Oregon] coastal region.” Additionally, “we estimated that exposure of steelhead to high water temperatures will be greatest in the southern [Oregon] coastal and interior Columbia River Basin.” Despite these known climate change challenges facing RSP fish, the draft plan applies less cautionary management to these populations due to incomplete assessment of their status. ***We request an alternative be added to the next draft plan, which would assume a higher risk status for those populations with limited VSP data completeness and/or adult information. For example, Rogue Summer Steelhead would be Sensitive Critical, instead of Sensitive. Rogue and Coastal Winter Steelhead would be Sensitive, instead of Strong-Guarded. Coho populations would be listed as Threatened instead of Sensitive-Critical.***

- b. ODFW identifies three categories for management goals in the draft RSP - desired status, conservation status, current status (Appendix V pg. 181 RSP). One significant component of a conservation and management plan is to prepare thoughtful actions to achieve desired status and actions to prevent serious depletion of species if declines occur. Currently, these actions, which are critical for timely and effective adaptive management, are missing from the June draft. ***We request specific hatchery and fishery actions be included as alternatives in the next draft for scenarios when populations hit conservation status. This should include considerations for other coexisting species and fisheries - we must manage for the most vulnerable species present. For example, Summer Steelhead present during Winter Steelhead fisheries in the Rogue.***
- c. Due to the lack of adult winter steelhead information, the draft plan utilizes juvenile information for coastal populations to determine current, desired, and conservation status. This information is only considered representative at the stratum scale - meaning this information is aggregated from the Winchuck, Chetco, Pistol, Hunter Creek, Euchre Creek, and Elk rivers. As a result, it will be difficult to determine and respond to a particular watershed in decline. Upon reviewing this data (see table below from 2021 WOPR report), we believe that the

conservation status triggers are set too low at 75% occupancy rate and 30,000 abundance. Despite population abundance concerns in recent years, the levels proposed would not once trigger the conservation status for these fish populations. ***We request in the next draft include an alternative that would set conservation status at 75% occupancy rate and 40,000 abundance for juvenile wild steelhead as an interim measure to more carefully and proactively respond to population declines.***

Klamath Mountains Province South Coast Stratum Steelhead Parr Estimates						
Year	Abundance	±95% CI	Density	±95% CI	Site Occupancy	±95% CI
2002	125,941	53%	0.130	32%	100	0%
2003	79,240	22%	0.069	20%	100	0%
2004	54,748	19%	0.070	23%	100	5%
2005	72,178	24%	0.057	20%	93	9%
2006	47,115	24%	0.053	18%	93	8%
2007	89,672	32%	0.058	33%	100	0%
2008	75,293	27%	0.061	24%	100	0%
2009	75,035	39%	0.043	35%	97	5%
2010	55,486	21%	0.057	24%	100	0%
2011	66,034	35%	0.042	27%	97	5%
2012	71,762	31%	0.073	30%	90	11%
2013	95,646	28%	0.055	25%	100	0%
2014	53,750	35%	0.044	22%	100	0%
2015	19,924	31%	0.027	23%	100	0%
2016	60,159	39%	0.060	35%	85	13%
2017	89,926	24%	0.058	27%	89	13%
2018	57,247	46%	0.045	50%	94	8%
2019	37,396	28%	0.039	33%	100	0%
2020	76,612	27%	0.047	21%	100	0%

d. The draft RSP includes adult monitoring efforts that will eventually provide improved data sets for fisheries management. However, the current draft does not specify when or how this adult data will be utilized to update status assessments, conservation and desired status ranges. For example, pg. 181 Appendix V states, “Asterisks (**) indicate metrics that may be developed with additional proposed monitoring.” ***We request the next draft specify when and how adult data will be utilized for these purposes. We find it concerning that ODFW is utilizing juvenile data because there are no other salmonid fisheries that rely on juvenile information to manage hatchery and harvest actions.***

e. On pg. 33 of the final draft RSP the status goal for Rogue Summer Steelhead, “is to maintain the current Sensitive classification.” While we agree significant challenges face these fish in the future, ODFW does not take a hard look in this plan at altering hatchery or harvest risks to benefit these species and move them out of the Sensitive classification. Additionally, this plan is the perfect place for

ODFW to outline the steps that need to occur with habitat protection and restoration to improve their status. ***We request the next draft include alternatives that specify the actions needed to improve this population's status to Strong-guarded.***

- f. Likewise on pg. 33 of the final draft RSP the desired status for Rogue-South Coast Coho Salmon is an improvement from, "Sensitive-Critical to Sensitive status." Again, we agree with the department's assessment of the significant climate-related stressors facing this population; however, this plan is the place to outline the steps to delist this population from the Federal Endangered Species Act, and achieve a Strong-Guarded status. It's unclear how the proposed increase in hatchery Coho and the mixed stock fishery it supports would help to achieve this goal. ***We request the next draft include alternatives that specify the actions needed to improve this population's status to Strong-guarded.***

2. ***Fisheries Actions and Regulations***

- a. ODFW's Native Fish Conservation Policy states, "When faced with scientific uncertainty concerning fish management, including status assessments and the effectiveness of recovery strategies, the Department shall proceed with precautionary strategies scaled to the conservation risk." In regards to wild winter steelhead harvest, precautionary measures are not indicated in the final draft RSP. The draft proposes wild harvest in a majority of rivers at current or elevated harvest rates without the adult spawner escapement or harvest information needed to develop a robust evaluation of the current status of populations. Specifically pg. 119 Appendix I utilizes harvest rates from random years between 2005 and 2014 with the last year of data being reported in 2013. This data states harvest rates on the Chetco river were an average of 15% (harvest cap indicated in draft RSP) with a high of 19%. More concerning, this data was reported before the elimination of wild harvest on California's Smith River and on Washington's Olympic Peninsula. This management action, particularly in California, created a large effort shift of anglers to the watersheds of southern Oregon which likely increased harvest rates on all watersheds including the Chetco. ***We support Alternative A, which would manage all wild Winter Steelhead populations for catch and releases until ODFW can collect, analyse, and present at least 5 years of adult spawner escapement data for each watershed where harvest is to occur. To offset the reduction in wild harvest, we request that daily bag limit of hatchery fish be increased to 3 fish.***

- b. The draft plan states, “Angling regulations for wild steelhead, coho, and cutthroat trout in RSP basins have changed significantly in the past 30 years, increasing protections for wild fish and maintaining limited wild fish harvest opportunity, while minimizing the need for hatchery releases.” (Draft RSP pg. 66). While harvest for wild summer steelhead in the Rogue River was discontinued in the early 1990s, hatchery releases were increased significantly. Currently, more hatchery steelhead (483,000 smolts per year) are released in the Rogue River than any other river on the Oregon Coast. The Umpqua River is 90% of the size of the Rogue and receives 65% of the Rogue’s quantity of hatchery steelhead releases. The RSP area also features the only rivers anywhere that currently allow and propose to continue, the harvest of wild steelhead in watersheds that also release hatchery fish (Rogue and Chetco rivers) for harvest opportunities. Hatchery release data for the Oregon South Coast does not support the rationale that the harvest of wild steelhead is in lieu of elevated hatchery releases. ***We request this language and rationale that wild harvest occurs due to the lack of hatchery fish be removed from all future drafts of the RSP.***
- c. The draft RSP does not specify what fishing restrictions will go into place when conservation status is observed (instead of forecasted). ***We request an alternative in the next draft plan that specifies that all fishing for wild fish will go to catch and release after a single year when conservation status is observed. ODFW should also specify under what conditions the fishery would add additional angling restrictions such as gear type, temporal or geographic closures, or closing entirely to all angling, including catch and release.***
- d. ODFW utilized a population viability assessment (PVA) on upper Rogue Winter Steelhead to determine a harvest rate cap for Wild Winter Steelhead. This PVA does not take into account climate change. Instead the PVA assumes the next 100 years of environmental conditions will resemble the past 100 years. This is not a credible outlook considering climate forecasting. Therefore, we do not agree that ODFW has established solid scientific evidence that a 15% harvest rate would not have a negative impact on key life history traits, like repeat spawning steelhead. According to Allendorf et al., 2008, “Harvest has the potential to cause three types of genetic change: alteration of population subdivision, loss of genetic variation, and selective genetic changes.” In an analysis of life history diversity in steelhead benefiting their survival, Moore et al, 2014 states, “Environmental variability is prevalent, driving the evolution of life histories of many species (Stearns 1992). A variety of life-history strategies spread risk across temporal variability (Stearns 1992; Wilbur & Rudolf 2006). For instance, greater longevity

can buffer populations from environmental variability (Morris et al. 2008). Similarly, iteroparity, where individuals reproduce more than once during their lifetime, leads to buffered lifetime fitness (Orzack & Tuljapurkar 1989).”

We request an alternative in the next draft plan where ODFW monitors catch and release mortality on wild Summer and Winter Steelhead for at least the next 5 years. Then, once adult escapement information is available on these populations, ODFW staff analyze what additional harvest mortality can be applied to specific populations without decreasing their resilience in a changing climate.

- e. The draft RSP does not quantify mortality from catch and release in its harvest rates. During the Independent Multidisciplinary Science Team (IMST) review of the draft Coastal Multispecies Conservation and Management Plan (CMP), this team of scientists shared concerns with ODFW’s lack of consideration for catch and release hooking mortality in the CMP. They stated in their review, “It would be useful if the topic of potential mortality of wild fish caught in the recreational fishery that were released back into either marine or freshwater were discussed.” Also, “A thorough review of bycatch damage to wild fish is needed, as is a thorough discussion of hatchery and harvest goals versus holistic ecological goals regarding wild fish and the ecosystem processes supporting them.” (IMST CMP review 2013). ***We request that ODFW specify in future drafts that harvest rate caps are the cumulative mortality from catch and release, direct harvest, and illegal and unreported harvest. We request that ODFW’s ELS system be updated to incorporate catch and release information.***

- f. A significant concern from nearly all stakeholders is the lack of reliable adult harvest and spawner escapement information available on wild Winter Steelhead populations. In the fishery section, the plan does not outline what will occur in the fishery if the proposed adult Winter Steelhead monitoring program is not funded/implemented or partially implemented. ***We request as an alternative in the next draft plan that states that future wild harvest opportunity is only available for those watersheds with annual spawner escapement and adult fishery mortality information. If the adult monitoring is suspended, the wild harvest opportunity is suspended as well.***

3. ***Hatchery Management***

- a. The draft RSP states on pg. 58 that, “A 10% pHOS limit, which has been considered a low-risk threshold in other conservation plans (e.g. ODFW 2010, ODFW 2014), will apply across all populations.” When assessing the risk of

certain pHOS thresholds, ODFW should cite peer-reviewed scientific evidence instead of its own, past plans to make this assessment, especially when new state policies require additional analysis for climate change. ***We request in the next draft, ODFW present the peer-reviewed scientific evidence that demonstrates, with a changing climate, that a 10% pHOS limit can be considered low risk.***

- b. The regulatory framework of the draft RSP relies on percentage hatchery origin spawners (pHOS) to ensure that hatchery fish do not negatively impact wild fish (draft RSP pg. 56). As the draft admits, this measurement does not capture all risks from hatchery programs including infrastructural (operation of facilities, disease, removal of wild spawners for broodstock) or ecological (competition and predation) nor the magnitude of these risks. Recent scientific consensus on hatchery and wild fish impacts suggests, “In most cases, measures that minimize the interactions between wild and hatchery fish will be the best long-term conservation strategy for wild populations” Chilcote, Goodson and Falcy (2011). Currently, Wild Fish Emphasis Areas (WFEAs) and Mixed Emphasis Areas (MEAs) are only differentiated in management by areas with and without hatchery releases. We find it concerning that there is no differential limit of pHOS in WFEAs or MEAs and that the draft RSP states that MEAs “may have higher pHOS, but will be managed to maintain population scale pHOS below 10%.” Continuing, it has become clear that spawning surveys have not been conducted sufficiently in distinct plan measurement areas. NFS understands the limitation of resources to conduct this monitoring, however, relying on a few spawning surveys to assess pHOS for entire populations leaves significant room for error. Without a robust way to measure pHOS, this measurement trigger lacks efficacy. ***To accomplish the goal of minimizing interactions between wild and hatchery fish (not just spawning), we request that the next draft include an alternative where WFEAs limit pHOS to <5% and that Mixed Emphasis Areas limit pHOS to <10%. If pHOS limits are exceeded, associated hatchery releases for MEAs or nearby hatchery releases for WFEAs will be reduced immediately until pHOS compliance is met.***
- c. The draft RSP’s limiting factors analysis on page 35 suggests that hatchery fish are not even potential limiting factors for most wild populations. ODFW does not provide substantial information to ground this claim. Peer-reviewed research has shown that hatchery fish may not only compete with wild fish in the freshwater environment, but may also prey on them (Tatara and Berejikian 2012, references in Poirier and Olson 2017). Negative effects of competition by hatchery fish on wild fish have also been observed in the ocean (Cline et al. 2019). The RSP draft

expresses, “Maintaining the productivity and adaptive capacity of wild populations is critical to long-term viability, particularly given the potential impacts of climate change.” The failure to address hatchery fish ecological impacts through competition is a failure to the goal stated in the “Hatchery Actions” portion of this plan. This is not the first Conservation Management Plan ODFW has developed lacking this information and critical evaluation. The IMST provided concerning comments on the ODFW Coastal Multispecies Conservation and Management Plan stating, “Additionally, focusing concern with hatchery fish on straying and effects at spawning grounds tends to preclude consideration of their effects at sea in competition for limited food—especially when the ocean is a major limiting factor.” Also, “Nonetheless, there is a clear contradiction between increasing hatchery production to sustain increased harvest versus decreasing hatchery production and harvest to decrease the risk to wild salmonids. Therefore, much stronger arguments are needed than are provided given the fiscal and ecological costs of hatchery production relative to other fiscal needs of ODFW, the genetic costs of hatchery fish straying to spawning grounds, and increased feeding competition in freshwater (e.g., Nickelson et al. 1986; Nickelson 2003; Pearsons 2008; Naman & Sharpe 2012; Tataru & Berejikian 2012), in estuaries, and at sea (e.g., Daly et al. 2012; Kaeriyama et al. 2012; Naish et al. 2008; Ruggerone et al. 2012).” ***We request that ODFW include, at minimum “?”, to signify a potential limiting factor, for hatchery competition for all populations and fund research to determine the magnitude of this risk to wild fish.***

- d. The draft RSP includes the lower Winchuck River and lower Euchre Creek as Mixed Emphasis Areas (MEAs) for the stated purpose of *future* Fall Chinook Salmon hatchery programs. Fall Chinook are not a species considered within the Rogue South Coast Plan. Therefore, this plan should not alter management for a species contained in a Commission adopted ODFW conservation and management plan. ***We strongly recommend removing these MEAs for the lower Winchuck River and lower Euchre Creek from any future draft of the RSP.***
- e. On page 57 of the draft RSP, it is unclear what is meant and what the result will be from the statement: “truncating period when “recycling” hatchery summer steelhead. We’re concerned that this practice of taking hatchery steelhead received at the hatchery, trucking them back downstream, and releasing them back into the river is harmful to the wild steelhead population. Erdman et al, 2018 found in their study of recycled hatchery steelhead in the Willamette system that, “Low reported harvest and straying and demographic estimates indicate the recycling program may have negative effects on endemic Willamette River Steelhead.”

Often, recycled hatchery steelhead do not return to the hatchery a second time and can increase spawning rates of hatchery fish with wild fish. To ensure responsible hatchery management, ***we request as an alternative in the next draft of the RSP that all recycling of hatchery Summer Steelhead be discontinued.***

- f. Hatchery Summer and Winter Steelhead and Coho Salmon releases in the Rogue River are characterized in the plan as mitigation programs. We find this misleading as current returns of hatchery Coho and Steelhead significantly exceed mitigation goals. For example, Cole River Hatchery must provide 500 Summer Steelhead to mitigate for lost habitat from William Jess Dam. Currently, 3,800 hatchery summer steelhead return to the hatchery annually, according to ODFW information provided in the second stakeholder packet. This means that 3,300 hatchery summer steelhead are not mitigation, but hatchery augmentation. Similarly, for Coho Salmon the mitigation goal is 500 hatchery fish and 1,338 return annually. For Winter Steelhead the mitigation goal is 2,000 fish and 2,882 return annually. For Threatened wild Coho Salmon and Sensitive wild Summer Steelhead, excess hatchery fish contribute to risk from competition, predation, disease, and genetic introgression that goes largely unevaluated in the plan. To provide an example of our concern, according to data collected during the Huntley Park Seine, since 2010 hatchery half-pounders accounted for 63% of all half pounders returning to the Rogue River. These hatchery half-pounders compete with wild half-pounders for food and space in the river. In fact, Everest, 1973 found that 97% of the adult Summer Steelhead in the Rogue River first returned as half-pounders. This means that almost all wild Summer Steelhead are subject to competition with hatchery half-pounders before they return as adults. The benefits of removing hatchery impacts from wild populations are well established on the Oregon Coast. For example, wild Oregon Coast Coho made a remarkable recovery according to ODFW (Jones 2018) once hatchery Coho Salmon were no longer released in coastal watersheds including Salmon River. Considering that hatchery returns exceed mitigation goals and the sensitive and threatened status of wild Summer Steelhead and Coho Salmon, ***we request an alternative in the next draft that would reduce Rogue hatchery releases down to the level necessary to meet, but not exceed, mitigation goals. Likewise, we request an alternative in the next draft that would not increase hatchery Coho Salmon releases by 25,000 as proposed in the January draft.***

Hatchery mitigation goals for the Rogue Basin are indicated in the RSP Hatchery Actions section of the plan. Mitigation goals and mitigation returns are as follows:

Release locations	Winter Steelhead			Summer Steelhead			Coho		
	Goal	Return	% return	Goal	Return	% return	Goal	Return	% return
M Rogue / Applegate	2,000	2,769	138%	-	-	-	-	-	-
Upper Rogue	2,000	2,882	144%	500	3,800	760%	500	1,338	268%

- g. ODFW did not include any evaluation of residualized male hatchery fish (and/or hatchery half-pounders Rogue River only) in pHOS for the Rogue and Chetco rivers. Although most precocious males likely are found close to the hatchery or release site, they can move a substantial distance and ascend tributaries they were not planted in (McMichael 2001). ODFW has documented residualized males up to 39 miles upstream (Whitesel 1994) of their release site and they have been documented moving downstream as well. The presence of precocial hatchery fish needs to be evaluated as a potential limiting factor for wild fish in these basins as part of annual pHOS monitoring. ***We request an alternative in the draft RSP that includes monitoring for pHOS inclusive of known spawning hatchery half-pounders, precocious hatchery males, as well as adult hatchery steelhead.***
- h. The draft RSP proposes new acclimation facilities on the middle Rogue to “improve harvest of mitigation hatchery production.” On the Chetco River a proposed, “acclimation site will be established to increase smolt survival, reduce straying outside the MEA, or adjacent watersheds, provide additional volunteer outreach, and increase angler opportunity.” According to Kenaston et al, 2001, “We found no significant difference in homing rate or survival between hatchery steelhead acclimated for 30 d and those trucked from the hatchery and directly released.” Moreover, Kenaston, 2001 states, “Streamside acclimation facilities are expensive to build and operate.” With critical monitoring efforts, including Didson sonar on the Rogue and Chetco currently unfunded we cannot support these expensive projects with questionable efficacy. ***To better utilize limited resources to improve fisheries and conservation, we request an alternative in the next draft that omits new mid-Rogue River hatchery releases and the acclimation facilities at Jumpoff Joe, Green, and Skunk creeks and in the lower Chetco River. To reduce straying, these fish should be released into areas where they can readily be captured and/or hatchery releases should be reduced.***

- i. The draft RSP section on “Broodstock Management” places restrictions on Rogue River wild broodstock collection: “...will be periodic, limited in scope (20-30 adults), and will only occur in years when returns are expected to be above average.” We would like to see the same precautions taken as a part of the Chetco River wild Winter Steelhead broodstock collection program. Currently there are no restrictions on wild broodstock collection, even if the wild population is returning below average or at conservation status levels. ***We request ODFW develop an alternative that reduces wild Winter Steelhead broodstock collection and Wild Winter Steelhead hatchery releases if conservation status is reached and provide a framework for ensuring wild broodstock collection does not decrease the resilience of the wild population by limiting wild spawner diversity and abundance in poor return years.***

4. ***Monitoring and Research***

- a. The draft RSP details a monitoring program that will require significant funding to operate. The RSP must monitor adult escapement, adult angling mortality (catch and release and direct harvest) and pHOS in each watershed to adequately monitor population health and abundance. This monitoring will provide information that can be integrated into desired and conservation status estimates for adults and be used to inform adjustments to fishery and hatchery actions. ***We request that monitoring of individual watersheds for pHOS, adult escapement, and adult angling mortality be collected annually for any future wild population managed for wild harvest. We also request that future draft plan detailing monitoring frequency (how many surveys per watershed per year). If funding for adult monitoring is suspended, wild fish harvest is also suspended.***
- b. According to the draft RSP, monitoring of pHOS in south coast basins will be conducted through annual snorkel surveys. Although snorkel surveys could be used to measure pHOS, more advanced genetic techniques have been developed to increase accuracy and reduce the challenges with snorkeling in adverse conditions. Additionally, has ODFW considered monitoring that would determine total hatchery returns? With this information, harvest information and wild spawner escapement information, an assessment of pHOS could be made for a whole population. It has become clear no spawning surveys have been conducted in the upper Rogue watershed. NFS understands the extensive resources needed to conduct such surveys, but are concerned about utilizing pHOS measurements as a trigger if no spawning surveys are being conducted and or no adult fish are being observed on the spawning grounds. ***We request an alternative in the next draft***

RSP to utilize research action V.C.7. Genetic pHOS Monitoring to help determine pHOS in all watersheds of the Rogue and south coast stratum and/or consider whole population pHOS monitoring alternatives.

- c. The RSP draft identifies two concerning research projects that were previously included as hatchery management actions. Stakeholders were informed ODFW moved these actions to research to designate specific areas as WFEA. These research actions are: 1) Page 90, V.D.8. “Steelhead Reintroduction Above Dams,” and 2) Page 90 V.D.9. “Coho Reintroduction Above Dams.” These actions are to investigate the potential restoration of natural production above barriers. We suggest that ODFW provide volitional fish passage for wild fish to restore natural production. ***We request an alternative draft plan that omits research project V.D.8. and V.D.9. allocating the funding for these projects to V.B.2. Fall Spawning Ground Surveys or V.C.7. Genetic pHOS Monitoring and develop plans for volitional fish passage in these areas.***
- d. A suite of Research and Monitoring actions are indicated in Table 21 on page 85 of the draft RSP; some have allocated funding and others are indicated not yet funded. These actions need to be prioritized for wild native fish. Page 86 “Fall Spawning Ground Surveys” to restore natural production, are indicated and unfunded. ***We request an alternative in the second RSP draft with a table prioritizing monitoring and research for wild fish, including a commitment to funding V.B.2. Fall Spawning Ground Surveys.***

5. Climate Change Impacts and Management

- a. Through the Stakeholder process, ODFW did not mention integrating climate change considerations into the Hatchery Actions or Fishing Actions of the RSP. The ODFW Commission adopted a Climate and Ocean Change Policy in July of 2020. This policy states, “The Department will incorporate the relevant Key Principles in 635–900–0013 through 635–900–0020 into any new Department plans or policies and will revise any existing plans or policies to incorporate these principles as needed.” ***We request that ODFW present an analysis of how its proposed hatchery and fishing actions consider climate change in a future draft of the RSP.***
- b. The draft plan indicates strategies or actions which address climate change with a little symbol; however, Stakeholders were not informed of how the actions or strategies will directly respond to climate change impacts. ***We request in the next draft of the RSP, ODFW include clear explanations of how the actions and***

strategies indicated with the climate change symbol are mitigating specific effects of climate and ocean change.

- c. There are no clear actions the department will take when there is evidence that wild fish are threatened due to climate change. ODFW’s new Climate and Ocean Change Key Principles for Species and Habitat Management (635–900–0017-(6)) includes the following statement, “The Department should plan for real time adaptive management of hatcheries, wildlife areas, and harvest to account for potential impacts to fish and wildlife populations during periods of adverse environmental conditions, such as high water temperature, low river flows, low oxygen water, or fire.” It is unclear in the draft RSP what triggers that initiate this adaptive management or the adaptive management actions that will be implemented. For example, will eliminating wild harvest, restricting fishing during low flows or high water temperatures, creating cold water refuge areas off limits from angling, reducing hatchery releases and wild broodstock collection, or restricting fishing methods be considered? ***We request a table identifying triggers associated with climate change and specific actions the department will take to mitigate for these effects. The ultimate goal of these climate specific actions is to restore abundant and diverse wild fish, the key element to battling the overarching effects of climate and ocean change.***

6. Limiting Factors Table -

- a. The limiting factors in this table (page 35) seem to be biased and lack scientific research or evaluation. A full explanation of how each limiting factor was determined to be a primary or secondary factor would help inform the rationales for their management. Multiple areas are indicated as “?” in the table’s hatcheries section, indicating a potential limiting factor that requires additional information or assessment. For example, pHOS in the Chetco River is unknown, as are the effects of both introgression and competition. Competition between wild and hatchery fish in the middle and upper Rogue is unknown and introgression was not considered. Hatchery introgression is a huge concern for wild fish populations (Chilcote 2003). ***We request a complete analysis of Table 8 page 35 of the draft RSP including an explanation of how primary and secondary limiting factors were scientifically identified.***

7. Stakeholder Process consensus/non-consensus -

- a. Following the RSP Stakeholder process where key fishery and hatchery management recommendations did not reach consensus from stakeholders, ODFW Staff agreed that the ODFW Commission would be presented with a suite

of alternatives on non-consensus items. The first draft of the RSP contained no suite of alternatives for the management of non-consensus items. The final draft of the RSP contained a suite of angling alternatives for wild winter steelhead, but the planning process included numerous other areas of non-consensus among stakeholders. While we now understand (ODFW communication) that the lack of alternatives presented in the January draft reflected Department staff's interest in presenting a scenario to test for consensus, we believe that more alternatives need to be developed in regards to population status, hatchery actions, and management triggers and actions when conservation actions are needed. ***We request all alternatives proposed above be included and considered in the next draft of the RSP for the Commission.***

8. ***Independent Science Review***

- a. For over a year, stakeholders and interested parties were interested in using the best available science to support the plan and help make informed decisions. Stakeholders pointed to the implementing guidance of the Native Fish Conservation Policy (635-007-0505) (8) which states, "When developing fish conservation plans, delineating naturally reproducing populations, and defining species management unit borders, the Department shall: (a) use the most up-to-date and reliable scientific information and, as appropriate, convene an ad hoc team of scientists for collaboration and assistance;..." The independent science review of the plan took place between the January and final drafts of the RSP. After repeated requests for this information, ODFW released the science review after a Freedom of Information Act (FOIA) request. This science review was a line item edit requested by the department rather than an overall management review of the RSP. It cannot be compared to the depth of the review conducted on the Coastal Multi-Species Conservation and Management Plan. Both reviewers did not give a biological management opinion on the most controversial decision of this plan, wild steelhead harvest, a clear detriment to the overall creation of the plan. ***Stakeholders were denied their request for an ad hoc team of scientists during the development of the RSP. We request that all future management plan development processes include an ad hoc science team to assist and advise stakeholders and the department.***
- b. The IMST completed a science review of the CMP in 2013 for the adoption of the CMP in 2014. There were key concerns they identified in the plan that remained unedited in terms of content. Other concerns the team flagged were simple grammatical errors. These errors were never changed or adjusted in the final plan. For example, 'Page 127 – 'stream' not "steam"; 'fourth' not "forth"'. ***We request***

that ODFW provide line item changes in future drafts to demonstrate how independent reviewer feedback is being incorporated and easily inform stakeholders and the Commission of changes.

- c. The IMST elevated another key issue during their review of the CMP: the science team did not receive adequate time to review and provide detailed recommendations. The IMST team stated, “We had a limited time to provide this review, and hence we could not get into specific background material used in development of the Plan to ensure accuracy of statements, etc” (IMST 2013). Although a science review was already conducted, and results were shared with stakeholders, we question if reviewers had the adequate time to give full evaluation of this plan to provide an overall evaluation of management. ***We request the independent science review team receive ample time to analyze the draft RSP. We request the department take recommendations and include those changes in the next draft of the RSP.***

Native Fish Society appreciates the opportunity to participate in the stakeholder process and provide comments on the first and second drafts of the RSP. We commend ODFW staff, specifically Tom Stahl, Chris Lorion, Dan Van Dyke, and Steve Mazur for their work on this conservation and management plan. We greatly appreciate their engagement with local stakeholders in the future management of wild fish in southwestern Oregon, and would encourage them to diversify stakeholder engagement in the development of future plans in order to represent all Oregonians.

Conservation of the species identified in this plan requires multiple steps to provide future opportunities for the fish, the rivers, and communities of southern Oregon. We must clearly understand the status and threats facing wild fish, their watersheds, and the greater ecosystem before we add additional risk to wild populations through harvest and increased hatchery releases. Due to past funding cuts to monitoring efforts, much is unknown about these fundamental questions. In light of this reality, we must follow the directives of the Native Fish Conservation Policy and the Climate and Ocean Change Policy and proceed with caution, not the status quo, until the unknown is answered. To be clear, we do not want to see additional species in southwest Oregon decline and be removed from state management due to an Endangered Species Act listing.

Through a precautionary approach, we believe restored populations of wild fish that provide angling opportunity, including sustainable harvest, are possible for the Rogue and South Coast

watersheds. We look forward to that day and hope to share these opportunities with future generations looking to experience the remarkable natural resources that southwestern Oregon has to offer.

Best regards,

Charles Gehr
Rogue River Steward

Kirk Blaine
Southern Oregon Regional Coordinator

Mark Sherwood
Executive Director

Citations

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Poirier, J., & Olson, D. 2017. Literature review of survival, age at return, straying, life history diversity, and ecological effects of subyearling and yearling hatchery release strategies for fall Chinook salmon. US Fish and Wildlife Service, Columbia River Fish and Wildlife Conservation Office, Vancouver, WA.

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KINGSLEY Lisa M * ODFW

From: Harry Piper <steeliepiper@gmail.com>
Sent: Wednesday, December 15, 2021 1:28 PM
To: COMMISSION ODFW * ODFW
Subject: Catch and release

Follow Up Flag: Follow up
Flag Status: Flagged

My name is Harry Piper, from Ashland, OR and the Rogue Fly Fishers, and we support Alternative 2, catch and release for wild winter steelhead in the Rogue Southwest OR Plan. I will also testify on Dec 16.

Sent from my iPhone

KINGSLEY Lisa M * ODFW

From: Mary Ann Dozer <flyfishingpursuits@gmail.com>
Sent: Wednesday, December 15, 2021 1:43 PM
To: COMMISSION ODFW * ODFW
Subject: Wild Steelhead Harvest in Southern Oregon

Follow Up Flag: Follow up
Flag Status: Flagged

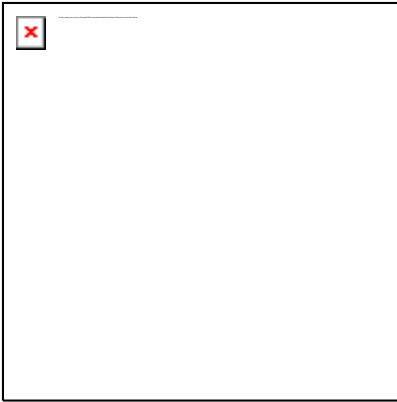
To whom it may concern I am writing to voice my opposition to wild steelhead harvest in Southern Oregon,

My name is Mary Ann Dozer and I am an avid angler as well as a guide in the Central Oregon region. I am writing to urgently voice my concerns about wild steelhead management in Southern Oregon.

There are currently nine streams where wild steelhead harvest is proposed to be allowed. It is my understanding that there is not an accurate population estimation or harvest estimation for steelhead in any of these waterways. I have always liked the saying that if you can't measure it you can't manage it.

I would like to point to the Olympic Peninsula (OP) in Washington state as an example. In some OP rivers, the catch rate was over 100%, meaning that every steelhead in the system was caught and released more than once. This also means that if it wasn't for catch and release the population could potentially be fished to functional extinction in a single season. Without accurate information in these Southern Oregon waters the risk of allowing harvest is much too high. In my opinion, if the harvest of wild steelhead is allowed in these waters, it should be considered mismanagement.

I would also like to point out that there are excellent angling opportunities in Southern Oregon for anglers to target and keep hatchery steelhead. Studies are showing that wild steelhead genetics are important to the long-term survival of the species. With declining steelhead numbers across the west coast of North America, I believe now is the time to make a stand and protect these wild populations from harvest. If we don't take a stand now we may not have another chance. I strongly oppose the harvest of wild steelhead in Southern Oregon under the current conditions.



Mary Ann Dozer

Fly Fishing Pursuits

Pursuing the Passion of Fly Fishing

Fly Fishing Guide for Fly Fishers Place | Winston Pro-Staff

FFI Casting Board of Governors | FFI Master Casting Instructor

Website: www.flyfishingpursuits.org | phone: 541 760 6057 | email: flyfishingpursuits@gmail.com |

KINGSLEY Lisa M * ODFW

From: rad@raddyer.com
Sent: Wednesday, December 15, 2021 2:05 PM
To: COMMISSION ODFW * ODFW
Cc: TATE Michelle L * ODFW
Subject: Rogue South Coast Multi-Species Conservation Management Plan Comments
Attachments: Rogue South Coast Conservation Management Plan Letter.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi, Please see my comments in the attached letter. I was planning to provide personal comments tomorrow, but due to an unexpected schedule change I am submitting a letter instead. Thank you.

Richard Dyer
541-480-8853

12/15/2021

To: ODFW Commission

Regarding: Rogue South Coast Multi-Species Conservation Management Plan (RSP)

Dear Chair Wahl and the ODFW Commission,

I am writing to provide my comments to the Commission on the October draft of the Rogue South Coast Multi-Species Conservation Management Plan (RSP) for the last Public Hearing and input opportunity that takes place tomorrow 12/16/2021.

I am a 4th Generation, Native Oregonian on both sides of my family. I live in Camp Sherman and Port Orford, Oregon. My Grandparents fished for Steelhead and Salmon in Oregon, as did my parents. I enjoy the benefits of my Oregon Pioneer License Status and I have fished for Steelhead and Salmon all of life since childhood. My children fish for Steelhead and Salmon and I hope someday that my Grandchildren and future generations will also have the opportunity to know these Incredible Fish.

Over the years, I have fished nearly every river in Oregon that contains populations of Steelhead. I have pursued Steelhead from the Skeena River System in Canada south to the Bay Area of California and inland into Idaho.

I have amassed an arsenal of gear specifically for the purpose of Steelhead Fishing that includes 5 boats, over 40 rods, reels, accessories, and other equipment. I fish on my own, I fish with family and friends, I often employ Guides, stay at lodges, motels, camps and contribute large amounts to local economies for things associated with traveling to fishing destinations and things associated with actually getting out on the water and incidentals like meals out or groceries.

I am a very knowledgeable and effective fisherman. I am not alone. Modern gear, local knowledge, guides and so much more have allowed there to be many, many, too many, effective fisherman. I fish by all methods, but probably enjoy fly fishing the most. I made a personal decision over 20 years ago to practice Catch and Release Fishing for all of my Steelhead Fishing. Even though myself and most of family and friends practice Catch and Release Fishing, I have personally witnessed a good number of fish killed incidental to just fishing. These were caused mostly by bad hook ups with bleeding, poor fish handling, too high of water temperatures, poor release methods, overplaying a fish and more.

Steelhead populations in North America are in Deep Trouble! From the Bay Area of California north into Canada we are witnessing a sharp decline fish numbers.

This past year, trips that I had planned for to Idaho and Snake River Tributaries, the Deschutes River, the John Day River, the North Umpqua River, the Olympic Peninsula, and the Babine River in Northern British Columbia were all cancelled due to poor fish returns! In most cases these trips were not just cancelled, but the River Systems Were Closed by the Agencies or Governments in charge to protect limited numbers of returning fish.

As result, I fished the rivers that were open along with everyone else, mostly along the NW and SW Oregon Coast. Fishing pressure is way up on all streams that remain open and yet even these rivers are

in deep trouble with some of lowest catch statistics ever. I used to count the number of fish that I would catch in any given day. Now, I count the days and sometimes the months between landing a fish.

I often fish the rivers and creeks impacted by the South Coast Management Plan. Considering the current condition of Steelhead Populations in general on the entire West Coast of North America, I find it unfathomable that keeping Wild Steelhead is still allowed in these 9 South Coast Streams let alone any other rivers in Oregon like the Sixes, which apparently is not in the Management Plan.

I feel that the rules of allowing 1 Wild Steelhead per day and 3 per year are virtually unenforceable, not to mention that I have never been checked by a Game Officer or asked for a Creel Sample while fishing anywhere along the coast. In fact, in over 65 years of fishing in Oregon, I have only been asked a couple of times for evidence of licensing or for a creel sample and only once have I had a hatchery kept Steelhead inspected by a Game Officer. I have seen many times that the public and guides perceive that a boatload of fishermen can keep 1 Wild Fish each regardless of who actually hooks it. People do not stop fishing once they have kept their 1 Wild Steelhead. How is it possible to count how many Steelhead that one might keep in a season if there is low enforcement. It completely assumes that every angler is ethical and properly filling in their Harvest Cards. I would debate whether or not this is happening, especially if the rules allow one to continue fishing after keeping their legal fish.

The impacts of anglers and increased fishing pressure are just a small part of the overall problem. There are so many negative impacts on Steelhead and Salmon, so much dramatic evidence of declining populations, and so few hard facts and data of what really is out there that it only makes sense to stop allowing the intentional killing of Wild Fish until more Data can show that it is sustainable!

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)
- Catch and Release Mortality needs to be considered in any fish management plan.

Enact Catch and Release only for Wild Steelhead until hard data can show that populations are sustainable and recovering.

My hope is that my grandchildren and future generations will be able to personally experience great fishing and not just get to look at old photos of what used to be.

Sincerely,

Richard Dyer, Camp Sherman and Port Orford, Oregon

KINGSLEY Lisa M * ODFW

From: Jeff Perin <greendrakehatch@gmail.com>
Sent: Wednesday, December 15, 2021 2:28 PM
To: COMMISSION ODFW * ODFW
Subject: Wild Steel head must be released

Follow Up Flag: Follow up
Flag Status: Flagged

Oregon Dept of Fish and Wildlife,

I am writing today to ask that the ODFW changes regulations to protect all wild steelhead across the state. It is imperative that wild steelhead go under a strict catch and release regulation. As steelhead runs diminish with climate change, drought, ocean conditions and uncertainty on rivers they come back to spawn in, it is antiquated to believe that any angler should harvest a wild steelhead.

In rivers where wild steelhead exist, ODFW must take bait off the rivers, and go to barbless lures and flies only.

Thank you for your consideration,

Jeff Perin, owner
the Fly Fisher's Place
Sisters, Oregon
(541)549-3474
www.flyfishersplace.com
Facebook the fly fishers place
greendrakehatch@gmail.com

KINGSLEY Lisa M * ODFW

From: sam stover <salmonlisas@hotmail.com>
Sent: Wednesday, December 15, 2021 2:29 PM
To: COMMISSION ODFW * ODFW
Subject: Nov.16 meeting Chetco River

Follow Up Flag: Follow up
Flag Status: Flagged

Hello My name is Sam Stover. I am a local fishing guide. I am in favor of the expert opinion of ODFW staff for expanding the Chetco river brood stock program, and to allow continued harvest of wild Steelhead on the Chetco river.

KINGSLEY Lisa M * ODFW

From: sam stover <salmonlisas@hotmail.com>
Sent: Wednesday, December 15, 2021 2:38 PM
To: COMMISSION ODFW * ODFW
Subject: Sept 16 meeting chetco river

Follow Up Flag: Follow up
Flag Status: Flagged

Hello My name is Sam Stover. I am a local fishing guide. I am in favor of the expert opinion of ODFW staff for expanding the Chetco river brood stock program, and to allow continued harvest of wild Steelhead on the Chetco river. Thank You.

KINGSLEY Lisa M * ODFW

From: Shad Campbell <shadc@gmx.com>
Sent: Wednesday, December 15, 2021 3:26 PM
To: COMMISSION ODFW * ODFW
Subject: Management of Oregon's Rogue South Coast Steelhead Fishery

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,

I am an avid angler as well as a guide in the Central Oregon region. I am writing to urgently voice my concerns of wild steelhead management and opposition to wild winter steelhead harvesting in Southern Oregon.

There remain excellent angling opportunities for harvesting hatchery steelhead in Southern Oregon. However, wild steelhead must be protected to ensure the long term survival of the species.

Declining steelhead numbers across the west coast of North America have reached a critical level. Now is the time to protect these wild populations from harvest and ensure an opportunity for rebounding this amazing fish. Without proactive management, these fish will be lost. Please, do the right thing and protect wild steelhead. Future generations of anglers are depending on you.

Thank you,
Shad Campbell

KINGSLEY Lisa M * ODFW

From: Dana Hergert <danahergert@comcast.net>
Sent: Wednesday, December 15, 2021 3:36 PM
To: COMMISSION ODFW * ODFW
Subject: On Decision 3: Adopt Alternative 2: catch and release regulations

Follow Up Flag: Follow up
Flag Status: Flagged

Chair Wahl and Commissioners,

My name is Dana Hergert and I live in Bend, Oregon.

In regards to the Rogue South Coast Multi-Species Conservation Management Plan, on decision 3, I urge you to adopt Alternative 2: catch and release regulations for wild winter steelhead.

Currently, there is not adequate monitoring, no adult population estimates, and no accurate harvest rates for those fisheries. Until these basic numbers are available implement a conservative approach and adopt catch and release regulations.

Thank you for your time and consideration.

Sincerely,

Dana Hergert

KINGSLEY Lisa M * ODFW

From: John Kirk <jkirkuvm@gmail.com>
Sent: Wednesday, December 15, 2021 4:20 PM
To: COMMISSION ODFW * ODFW
Subject: Please protect wild steelhead - no more harvest of wild fish

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Commission,

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

I am reaching out to you to ask you to remove the regulation in Oregon that allows for the harvest of wild winter steelhead.

Steelhead populations are in great decline and these great fish are on the brink of extinction.

The economic benefits to the state of Oregon and all other areas that anglers travel to for steelhead fishing are too great to risk the extinction of these fish.

Hotels, restaurants, fishing guides, grocery stores, vacation rentals and a number of other businesses will all suffer greatly if there are no more fish to catch and drive tourist dollars into these small towns that depend on fisherman to stay afloat.

Thank you for your time and consideration!

-John Kirk

Sent from my iPhone







Public Correspondence








Received as of December 15, 2021

Subjects: Catch and Release for Wild Steelhead in Southern Oregon, RSP Final Public Comments, Take Action: Conserve Wild Fish on Oregon's South Coast, and Concerns regarding the Rogue-South Coast Multi-Species Conservation and Management Plan

**53 individuals submitted the attached letters
(Letters and List Attached)**

**12 individuals submitted the attached letters
with additional comments
(Letters Attached)**

     	From	Subject	Received	Size	Categories	Mention	
Yesterday							
	Ian Parent	RSP Final Draft Comments	Tue 12/14/2021 12:...	52 KB			
	Dear Chair Wahl, Please place a moratorium on the harvest of wild Steelhead at least until you have gained enough data to make an educated, scientific decision on the matter. In						
	Greg Stawinoga	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 12:...	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						
	Annie McMahon	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 1:3...	52 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						
	Dianne.Alpern	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 1:3...	53 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						
	Robert Payne	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 1:5...	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						
	Andrew Kelly	RSP Final Draft Comments	Tue 12/14/2021 2:0...	49 KB			
	Dear Chair Wahl, Please halt the harvest of wild steelhead. I am writing to comment on the October draft of the Rogue-South Coast Multi-Species Conservation and Management Plan						
	Leah Koehn	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 2:0...	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						
	Jared White	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 2:0...	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						
	Russell Huang	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 2:2...	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						
	Clara Hopkins	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 2:4...	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						
	A Michael Dian...	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 2:5...	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						
	Jon Hazlett	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 2:5...	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						
	Seth Picker	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 3:0...	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						
	Kevin Brown	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 3:0...	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						
	Adam Resnick	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 3:1...	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						
	Susan Tone	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 3:2...	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						
	Nate Moylan	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 3:2...	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						
	Adam Lee	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 3:3...	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						
	Mel Weaver	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 4:0...	53 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						
	Rachel Loui	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 4:3...	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 12/14/2021 4:3...	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						

     	From	Subject	Received#	Size	Categories	Mention	
	Josh Lusher	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 4:4...	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						
	Bryan Huskey	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 5:2...	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						
	Libby Glynn	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 5:3...	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						
	Natalie Rudy	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 5:3...	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						
	Mike Boyd	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 5:3...	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						
	Natalie Van Le...	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 6:0...	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						
	Noah Gulde	Catch and Release for Wild Steelhead in Southern Oregon	Tue 12/14/2021 6:1...	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						
	Neally Rhea	Concerns regarding the Rogue-South Coast Multi-Species Conservation and Mana...	Tue 12/14/2021 6:5...	51 KB			
	Dear Commission Chair Mary Wahl, I am writing to ask you to reject the Rogue-South Coast Multi-Species Conservation and Management Plan to protect the health of the fisheries of the						
	Jeffrey Bright	RSP Final Draft Comments	Tue 12/14/2021 7:4...	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						
	Melba Dlugonski	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 8:1...	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						
	Frank Rouse	Take Action: Conserve Wild Fish on Oregon's South Coast	Tue 12/14/2021 9:1...	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						
	Mark Kaelke	RSP Final Draft Comments	Tue 12/14/2021 9:5...	49 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						
Today							
	Sharifah Farah ...	Concerns regarding the Rogue-South Coast Multi-Species Conservation and Mana...	Wed 12/15/2021 12...	51 KB			
	Dear Commission Chair Mary Wahl, I am writing to ask you to reject the Rogue-South Coast Multi-Species Conservation and Management Plan to protect the health of the fisheries of the						
	Jennifer Hsia	Catch and Release for Wild Steelhead in Southern Oregon	Wed 12/15/2021 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						
	Peter Donahow...	Catch and Release for Wild Steelhead in Southern Oregon	Wed 12/15/2021 6:...	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						
	John Green	Catch and Release for Wild Steelhead in Southern Oregon	Wed 12/15/2021 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						
	Desiree Piter	Take Action: Conserve Wild Fish on Oregon's South Coast	Wed 12/15/2021 7:...	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						
	Sean Coyne	Catch and Release for Wild Steelhead in Southern Oregon	Wed 12/15/2021 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						
	copi vojta	Catch and Release for Wild Steelhead in Southern Oregon	Wed 12/15/2021 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						
	Dana Renton	Catch and Release for Wild Steelhead in Southern Oregon	Wed 12/15/2021 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						
	Katie Bartling	Catch and Release for Wild Steelhead in Southern Oregon	Wed 12/15/2021 10...	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						

    	From	Subject	Received	Size	Categories	Mention	
	Nick Watts	RSP Final Draft Comments Dear Chair Wahl, Wild Steelhead are a precious resource that can only benefit from a catch and release program. No single fish kept is worth risking what has become a catastrophic	Wed 12/15/2021 11...	53 KB			
	Shakayla Thom...	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). Southwest Oregon is	Wed 12/15/2021 11...	53 KB			
	Nick Bachtel	RSP Final Draft 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	Wed 12/15/2021 11...	50 KB			
	Marcus Mattioli	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	Wed 12/15/2021 11...	49 KB			
	Leila Mohseni	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). Southwest Oregon is	Wed 12/15/2021 11...	51 KB			
	Olive Ferrante	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	Wed 12/15/2021 11...	49 KB			
	Shelby Sawyer	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	Wed 12/15/2021 12...	49 KB			
	Jason Balderston	RSP Final Draft 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	Wed 12/15/2021 12...	52 KB			
	Terrie Williams	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). Southwest Oregon is	Wed 12/15/2021 12...	49 KB			
	Gail Battaglia	Concerns regarding the Rogue-South Coast Multi-Species Conservation and Mana... Dear Commission Chair Mary Wahl, I am writing to ask you to reject the Rogue-South Coast Multi-Species Conservation and Management Plan to protect the health of the fisheries of the	Wed 12/15/2021 12...	51 KB			
	Tim Peterson	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	Wed 12/15/2021 1:...	49 KB			

KINGSLEY Lisa M * ODFW

From: Rowan Baker <user@votervoice.net>
Sent: Tuesday, December 14, 2021 2:57 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

Wild steelhead are a precious resource. Management of wild steelhead should be based on the precautionary principle, until or unless stocks recover and are able to support take of fish at any level.

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,

Rowan Baker
2870 SE Kelly St
Portland, OR 97202
watershedfishbio@yahoo.com

KINGSLEY Lisa M * ODFW

From: Earl Haramaki <eharamaki@gmail.com>
Sent: Tuesday, December 14, 2021 4:01 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

I live in CA and sometimes fish the Southern OR coast. Please protect wild fish! There really is no reason to allow harvest of wild fish with OR's strong hatchery program. Please restrict take to hatchery fish only.

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

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Management Triggers and Actions

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- 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,

Earl Haramaki
633 Sherree Ct
Martinez, CA 94553
eharamaki@gmail.com

KINGSLEY Lisa M * ODFW

From: Mr. & Mrs. Bob Rodgers <bob@rodderspistolsmithing.com>
Sent: Tuesday, December 14, 2021 4:24 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

First fished these rivers in the early '80s. It's hard to believe, given the times and stress on wild fish every where , that harvest is still allowed. Please protect these precious 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.

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Management Triggers and Actions

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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,

Bob Rodgers
115 Randall Dr
Orofino, ID 83544
bob@rodderspistolsmithing.com

KINGSLEY Lisa M * ODFW

From: John Hanousek <user@votervoice.net>
Sent: Tuesday, December 14, 2021 4:58 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

I have been traveling to Oregon to fly fish for 15 years and believe the time to act is now to save wild steelhead. The trend is real, let's do our part and protect the wild diversity of the declining stock left.

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,

John Hanousek
13045 W Telemark St
Boise, ID 83713
johnhanousek@yahoo.com

KINGSLEY Lisa M * ODFW

From: imaginez@everyactioncustom.com on behalf of Inez Hileman <imaginez@everyactioncustom.com>
Sent: Tuesday, December 14, 2021 8:03 PM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Follow Up Flag: Follow up
Flag Status: Flagged

Dear ODFW Commission,

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

STOP THE KILLING OF THE EARTH & ALL LIVING THINGS.

PRESERVE & PROTECT BEFORE ALL IS GONE.

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 for all South Coast species—including Chinook.
- 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,

Ms. Inez Hileman

5 Oak Flat Rd Orinda, CA 94563-1922

imaginez@mac.com

KINGSLEY Lisa M * ODFW

From: Bruce Berry <user@votervoice.net>
Sent: Tuesday, December 14, 2021 8:16 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

My take on anadromous fish in the P.N.W. is that Southern Oregon rivers have somehow fared a bit better than many other Summer/Winter Steelhead rivers and streams in the P.N.W. Please consider an alternative Catch & Release plan for Southern Oregon rivers to help maintain or even increase anadromous fish stocks for the future generations of outdoorsmen to have opportunity to go after and learn about a fish species we love in the P.N.W.

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,

Bruce Berry
18872 S Forest Grove Loop
Oregon City, OR 97045
mainstreamod@yahoo.com

KINGSLEY Lisa M * ODFW

From: Daniel Coppinger <rubellafescu@gmail.com>
Sent: Tuesday, December 14, 2021 8:14 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

Seeing the steelhead fishery (and in general anadromous fisheries) in WA state, we need to revise our management or there will be no more.

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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Management Triggers and Actions

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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 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,

Daniel Coppinger
10433 Rainier Ave S
Seattle, WA 98178
rubellafescu@gmail.com

KINGSLEY Lisa M * ODFW

From: steve humphrey <user@votervoice.net>
Sent: Tuesday, December 14, 2021 8:46 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

We need to protect all wild steelhead to maintain and prosper the runs of these special 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.

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Management Triggers and Actions

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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,

steve humphrey
1810 Beaver St
Santa Rosa, CA 95404
Sthumphrey@sbcglobal.net

KINGSLEY Lisa M * ODFW

From: Mr. & Mrs. Brad Buter <bradbuter@gmail.com>
Sent: Tuesday, December 14, 2021 8:58 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

There is no reason to kill a wild steelhead and there never should be regulations allowing such. Catch and release of all wild anadromous fish is the only way they will survive, especially in this region with today's climate challenges.

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,

Brad Buter
1255 E 6th St
Los Angeles, CA 90021
bradbuter@gmail.com

KINGSLEY Lisa M * ODFW

From: Curt Reynolds <user@votervoice.net>
Sent: Wednesday, December 15, 2021 6:38 AM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

Ladies & Gentlemen: Please immediately enact and enforce a "No Kill-Catch & Release" policy for WILD STEELHEAD throughout Oregon. Thank you.

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

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Sincerely,

Curt Reynolds
948 Pine Hollow Rd
Stevensville, MT 59870
crcas3@yahoo.com

KINGSLEY Lisa M * ODFW

From: ljgcaron@everyactioncustom.com on behalf of Leah Guthridge Caron
<ljgcaron@everyactioncustom.com>
Sent: Wednesday, December 15, 2021 2:44 PM
To: COMMISSION ODFW * ODFW
Subject: Take Action: Conserve Wild Fish on Oregon's South Coast

Follow Up Flag: Follow up
Flag Status: Flagged

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 for all South Coast species—including Chinook.
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Wild Winter Steelhead Harvest

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- 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,

Mrs. Leah Guthridge Caron

20657 Wild Rose Ln Bend, OR 97702-2781

ljgcaron@gmail.com

KINGSLEY Lisa M * ODFW

From: Teresa Kasza <tk4fish@jeffnet.org>
Sent: Wednesday, December 15, 2021 4:24 PM
To: COMMISSION ODFW * ODFW
Subject: RSP Final Draft Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Chair Wahl,

I was a guide for 13 years and now am fishing for myself. I have never killed a wild steelhead knowingly as I recognize the invaluable genetics they hold for their survival. Please we are the few hold outs that allow this killing to continue. I encourage you to join with so many other Dept of Fisheries that have already taken this necessary step. There are plenty of Hatchery fish out there to bonk and I do, often ;-)

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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Sincerely,

Teresa Kasza
233 Rogue River Hwy
Grants Pass, OR 97527
tk4fish@jeffnet.org