

Public Forum

Rogue South Coast Plan

**Public Correspondence received
as of December 15, 2023**



Date: December 6, 2023

To: Oregon Fish and Wildlife Commission

From: Trout Unlimited, Native Fish Society and Wild Salmon Center

RE: Rogue/South Coast Multi-Species Conservation and Management Plan Conservation Triggers

Greetings Oregon Fish and Wildlife Commission,

We are writing today to express our gratitude for the Oregon Fish and Wildlife Department's efforts regarding the management and implementation of the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP). Our organizations participated as conservation stakeholders during the development of the RSP, so we are fully aware of the complexities and difficulties associated with managing the precious resources covered in this plan. While we did not get everything that we hoped for in the RSP, compromises were made by all the stakeholders and in the end conservation wins were solidified into this plan.

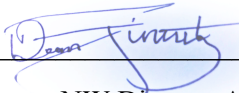
One of the positive conservation outcomes from the RSP process was the commitment of ODFW to increase monitoring efforts for species covered in this plan. Population level monitoring is essential for effective species management. Especially in the face of rapidly changing climate and ocean conditions. This monitoring allows ODFW to not only be aware of current population levels but also to forecast stratum level downturns.

Unfortunately, ODFW's monitoring indicates that Rogue steelhead populations are not faring well. The annual Huntley Park sein is a long-standing effort that uses steelhead 'half pounders' as an indicator of future adult steelhead returns. The RSP identified a two-year running average of at least 300 wild Rogue half-pounders as a conservation status threshold. The 2022 and 2023 RSP Annual Reports show that the two-year average for wild steelhead half-pounders is 285.5, and thus will initiate a conservation management trigger. On page 6 of the 2023 RSP Annual Report, ODFW states that "In the 2024-25 winter steelhead season, there will be changes in angling regulations for the Rogue Basin because the two-year average for the Rogue Stratum indicator (wild half pounder counts at Huntley Park) has fallen below the conservation status threshold. See page 86 of the RSP for more information about conservation status triggers and how they apply to the winter steelhead fishery."

While our organizations are deeply concerned with this steelhead trend, this conservation trigger is clearly demonstrating how ODFW's monitoring efforts can adapt management regulations and respond quickly

to downturns in species abundance. **There remains some uncertainty in what specific management actions will be triggered for the 2024/2025 steelhead fishing season.** The RSP states “at a minimum, harvest will be temporarily suspended by implementing catch-and-release (CnR) or basin closure regulations (at ODFW's discretion, and excepting the Lower Rogue, where a 1/1 bag limit may also be considered).” During the RSP update on December 15th, we look forward to hearing from ODFW staff regarding the specific management actions that will be implemented to protect and conserve wild steelhead in the Rogue River.

Thank you for your time and commitment to protecting these populations. Please reach out if you have any questions.



Dean Finnerty, NW Director ACP, Trout Unlimited



Mark Sherwood, Executive Director, Native Fish Society



Dr. Tim Elder, Southwest Oregon Program Manager, Wild Salmon Center



12-15-23 RSP comment

Chair Wahl and respected Commissioners;

On behalf of the Oregon Anglers Alliance and as a Stakeholder of the Rogue South Coast Plan, I'd like to thank you for allowing the opportunity to comment.

There is cause for much optimism as our fish populations are near, or exceeding desired status levels with the exception of the Rogue half-pounder run and the two-year return data. However, a two-year decline in a half-pounder population isn't in and of itself alarming and is not uncommon. This fact, combined with improvements in fish passage and habitat restoration, along with the additional research and monitoring, offers confidence that the near-future status of this population will likely return to a healthy state.

As you may know, there are many habitat restoration actions that have occurred. These, along with addressing mortalities associated with pinniped and pikeminnow, and the additional research and monitoring, help to ensure that these populations will continue to thrive. Additional kudos are to be extended to our managers for the implementation of an exciting new program utilizing coded wire tags on Chetco Winter Steelhead. This program will answer the age-old question of where these fish travel once they leave freshwater and enter the ocean. Additionally, the Rogue Winter Steelhead satellite tagging project promises to help unlock even more of these mysteries.

There are a host of habitat actions to celebrate, but the gravel augmentation for the upper Rogue is critical. Completing in-stream spawning habitat restoration that is currently in the "scoping" process, is paramount to increasing populations of all native salmonids, as well as lamprey, as they are symbiotic or co-dependent of one another.

Since dam construction in 1972, gravel replacement for spawning beds has continually declined. No one anticipated this, and therefore, we were not able to properly mitigate the consequences. This is perhaps, one of the most difficult challenges our managers have been faced with over the last 40 years. This is a complex web of agencies and policies to navigate. Hats off to Staff on this one for their diligence, but we likely need to provide them with additional help to ensure their success.

Not unlike the gravel augmentation project and the difficulties navigating a myriad of public agencies laws and policies, is our Cole Rivers hatchery and our inability for us to be able to maintain a high level of production. This has been an ongoing problem for many years and has seriously affected our ability to properly augment our native fish populations. The good news is that thanks to Staff, our congressmen, and a host of collaborative partners, we now are finally receiving funding for much needed infrastructure repairs! Special thanks to our hatchery staff for their diligence and ingenuity during these difficult times.

And finally, the Oregon Anglers Alliance realizes that although sportfishing has no effect on the viability of these populations, that the plan requires regulation changes for Rogue Steelhead due to half pounder counts being at conservation status. We look forward to continued collaboration throughout this process.

Gratefully,
Leonard Krug
President, Oregon Anglers Alliance

From: Charles Gehr <cdeghr@yahoo.com>
Sent: Friday, December 15, 2023 9:20 AM
To: ODFW Commission * ODFW <odfw.commission@odfw.oregon.gov>; TATE Michelle L * ODFW <michelle.l.tate@odfw.oregon.gov>
Subject: ODFW Commission Testimony

Good morning Chair Wahl, Commissioners, Director Melcher.

My name is Charles Gehr and I'm the Rogue River Steward for Native Fish Society. I served as a stakeholder in the development of the Rogue South Coast Multi-Species Conservation and Management Plan, commonly referred to as the RSP.

Like many people, I was concerned to see that our steelhead half pounders on the Rogue have dropped to conservation status based on the two year average return. Those numbers are based on Huntley Park seine counts. I was heartened to see in the report presented earlier that ODFW is planning to take action regarding winter steelhead but I am somewhat perplexed that there is no mention of actions being planned in regards to summer steelhead.

Huntley Park seine counts, in combination with monitoring, are identified as indicators for summer steelhead in the middle and upper Rogue. A recently published paper, co-authored by ODFW biologists (Dayan et al., 2023 - Attached) estimates that 65% of returning half pounders are summer steelhead, yet there is no mention of concern for what looks to be an extremely low return of wild summer steelhead in 2024.

Our summer steelhead in the Rogue are listed as a sensitive species. They are in the river much longer than winter fish and are more susceptible to being caught multiple times before spawning. I would like to see some actions being taken to ensure the survival of this species.

The RSP currently has no conservation metrics for early returning summer steelhead. The early returning fish enter the river during the hottest months of the year and endure the warmest water temperatures. A temperature closure would help to protect these fish from undue stress at a time when they are most vulnerable to poor handling. I would also like to see conservation metrics developed for the early returning steelhead through adaptive management.

I would like the opportunity to talk to ODFW staff and biologists about management actions that can be taken to ensure the survival of summer steelhead in the Rogue River. Thank you for your time and consideration.