NATIVE FISH CONSERVATION PLAN FOR FALL CHINOOK SALMON IN THE ROGUE SPECIES MANAGEMENT UNIT

Public Comments and ODFW responses on the draft plan of April 25, 2012

Public Comments and ODFW responses on the draft plan of April 25, 2012

Part 1. Written comments received by ODFW.
Part 2. ODFW responses to written comments.

June 20, 2012

Roy Elicker, Director
Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, OR 97303
rogue.fallchinook@state.or.us

Re: Conservation Plan for Fall Chinook salmon in the Rogue Species Management Unit

Dear Mr. Elicker,

We greatly appreciate the wealth of technical information about Chinook salmon in the plan. I am following up on an issue I raised at the June 5 public meeting in Grants Pass. The plan does not address lethal impacts to coho salmon caused by the Chinook fishery. This is important because Southern Oregon/ Northern California Coastal (SONCC) coho salmon are federally listed and the federal draft SONCC coho plan indicates coho salmon are at high risk of extinction in the Rogue Basin and California (see Katz et al. 2012). Although the National Marine Fisheries Service/PFMC allows liberal incidental coho "take", the estimated numbers of coho lost due to fishing needs quantification in the Chinook conservation plan. A single species management framework is not appropriate when fishes threatened with extinction (coho) are impacted by the more abundant species. We request that ODFW develop quantitatively valid analysis that would provide the best estimates of how many coho salmon are killed in the ocean as a result of all fishing and what part (%) of that fishing is from the ocean Chinook fishery. We suspect the ocean Chinook fishery is the major contributor to pre-spawning mortality of coho salmon. A longer Chinook fishing season would be expected to have a greater mortality factor for coho salmon. Similarly, the intensive river recreational fishery for Chinook would also be expected to cause some adult coho mortality. Since it was stated at the meeting that the ODFW is not planning to produce a coho conservation plan (due to federal planning process), pre-spawning mortality caused by the Chinook fisheries needs to be quantified by ODFW. We need quantitative data about incidental coho mortality to properly assess where our conservation efforts would be the most productive for restoring coho salmon to viable numbers. Additionally, conversations with fishers suggest that the coho kill in the ocean fishery is substantial and is apparently not being reported accurately.

The conservation plan lacks a critical analysis of habitat threats and quantification of those threats. Professionals from the habitat division or independent contractors are needed to needed to provide sophisticated analysis similar to the population dynamics analysis contained in the plan. Conceptual basis for habitat analysis are available (Frissell et al. 1997) and techniques are also available for spatially explicit analysis of habitat threats (Katz et al. 2012). We want to

know scientifically which habitat threats are the most important, irrespective of ODFW opinion about the need for regulation of harmful activities.

Current regulations allow push up dams in place through October 31 in the Illinois River Basin. Chinook are often blocked by these dams on the East Fork Illinois and Sucker Creek. The plan provides for measure A8(a) on p. 235 (Appendix H): "ODFW supports the removal of artificial barriers to the upstream migration of adult CHF and pursues improvement of upstream passage at those barriers that cannot be removed." The ODFW needs to make elimination of push up dams a top priority in the Illinois Basin. We also support the need to curtail fishing to protect later running Illinois River Chinook (p. 233 "time selective fishing mortality.. ")

The Plan states on p. 34: "Given the virtual absence of appropriate data, it is important to determine, at a minimum, whether the abundance of NP CHF in the Illinois population area co-varies in relation to the other NP CHF populations in the Rogue Stratum (*see* **Research Needs**, page 142)." We recommend that the ODFW conduct statistically valid Chinook, coho, steelhead and lamprey spawner counts in the Illinois Basin. My anecdotal observations over the past 20 years indicate the Illinois Basin Chinook run does indeed follow the trends in other parts of the Rogue basin, but abundance seems low given the high amount of spawning habitat.

Literature Cited

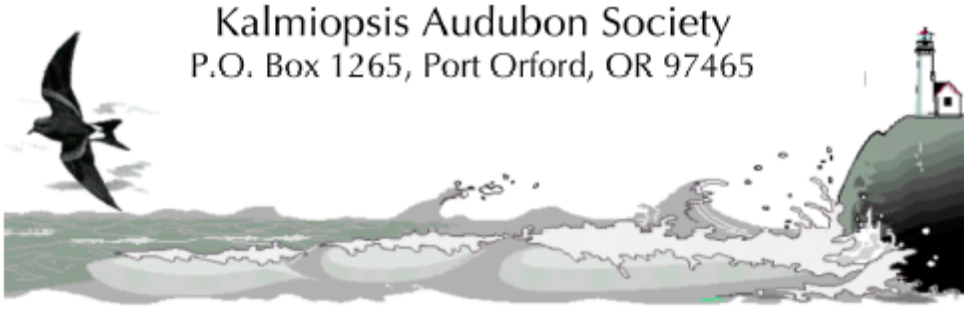
Katz, J. ,P.B. Moyle, R.M. Quinones, J. Israel, S. Purdy. 2012. Impending extinction of salmon, steelhead, and trout (Salmonidae) in California. Environmental Biology of Fishes. http://www.springerlink.com/content/e732l750m54p5r65/abstract/

Frissell, C. A., W. J. Liss, R. E. Gresswell, R. K. Nawa, and J. L. Ebersole. 1997. A resource in crisis: changing the measure of salmon management. Pages 411-446 *in* D. J. Stouder, P. A. Bisson, and R. J. Naiman, editors. *Pacific salmon and their ecosystems: status and future options*. Chapman and Hall, New York, New York, USA. http://catalog.streamnetlibrary.org/cgi-bin/koha/opac-detail.pl?biblionumber=923 pdf. also available from rich@kswild.org

Sincerely,

Richard Nawa
Staff Ecologist
Klamath Siskiyou Wildlands Center
Grants Pass Office 950 SW 6th
541-476-6648

Kalmiopsis Audubon Society
P.O. Box 1265, Port Orford, OR 97465



June 28, 2012

Oregon Department of Fish and Wildlife
29907 Airport Way
Gold Beach OR 97444

Greetings,

I am writing on behalf of the Kalmiopsis Audubon Society. Our Curry County-based organization has over 200 members who are concerned about habitat for birds, fish, and wildlife in our area, and so we appreciate the opportunity to offer comments on your draft conservation plan for fall chinook salmon in the Rogue Species Management Unit.

We strongly support ODFW's efforts to conserve native fish populations, and in this case of the Fall Chinook plan, we appreciate your efforts to identify limiting factors, to identify feasible and important actions, and to develop plans to help guide management that will help conserve our local fish populations into the future.

We have also appreciated the opportunity for a representative from our group, Harvey Young — who is a professional fishing guide, to participate in the public process of developing the plan.

In response to your request for public input, we'd like to voice two concerns about the draft plan and alternatives currently under consideration.

For the Rogue Stratum, we support the adoption of the ODFW recommended Alternative 4.

We oppose any strategies that target fish-eating birds in the Rogue estuary that are included in other alternatives. At this time, we know of no place-specific, credible, scientific evidence that indicates that these birds pose an actual threat to our local fisheries. We oppose the development of a plan to reduce cormorant predation through harassment until proper baseline data is collected and indicates that such a program is actually warranted. We also would expect to see credible studies showing that hazing is a proven method of fishery management.

Currently, Double Crested Cormorants are protected under the Federal Migratory Bird Treaty Act. The U.S. Fish and Wildlife Service has authorized predator control in only a very few instances where cormorants were demonstrated to pose a large problem, such as in the Columbia River estuary where birds began to nest on dredge spoils right in the middle of the

river—putting parent birds who were busy feeding chicks in close proximity to migrating smolts. In the Rogue estuary, the nearest Double Crested Cormorant breeding colonies are located on sea stacks several miles up and down the coast from the river mouth, and so parent birds are far more likely to forage in the ocean during this period of intense feeding on small fish. Developing and implementing a plan to harass cormorants in the Rogue estuary would very likely be a waste of public monies since your planning process has already identified many more cost-effective, proven, and important priorities that will be less likely to create controversy.

For the Coastal Stratum, we support the adoption of the ODFW-recommended Alternative 6. **However, we are concerned about the committee's recommendations for the Chetco River, which specify a higher-than-recommended level of hatchery production with 18 percent as the criterion for "desired status."(p. 109)**

Oregon's Native Fish Conservation Policy states that the conservation of native fish is the principle obligation for fish management practices by ODFW. The policy identifies the importance of "reproductive independence" of native stocks and clearly recommends that at least 90 percent of spawning fish within a population be naturally produced --in other words that no more than 10 percent of a fish population should be composed of hatchery produced fish.

> *Native Fish Conservation Policy 2002, page 6:*
> *"(5) Reproductive Independence – At least 90% of the spawners within a population must be naturally produced and not hatchery produced fish, unless the department determines the hatchery produced fish are being used in a short-term experimental program to help restore a population in its natural habitat or otherwise directed by a court order."*

The draft CHF plan's recommended criterion for the Chetco is inconsistent with the state's Native Fish Conservation Policy, and it is also inconsistent with recommendations made for runs in all the other coastal stratum streams (Hunter Ck, 5%; Pistol R, 5%; Winchuck R, 10%—p. 109), which are more in line with ODFW's native fish policy.

As far as I can determine, there is no substantive rationale presented in the draft report for the higher level of hatchery production for the Chetco and no plan described to decrease this higher-than-recommended rate of stocking in the future. Although the recommended 18 percent is lower than the current 22 percent of hatchery composition reported in the draft (p. 39), we are concerned that this higher-than-recommended level of hatchery spawner composition will impact the genetic viability of native fish. The Fall Chinook plan should identify a way to move toward a spawner composition level in the Chetco River that will be in line with the Native Fish Policy. Because the Chetco River in particular affords such high quality habitat in comparison to other streams in the Coastal Stratum, we believe attention to this run is of particular importance.

Again, we thank you for your efforts to develop plans to better manage our region's native fish populations, and we thank you for considering our comments.

Cordially,
/s/ Ann Vileisis
President

From: bethmark [mailto:bethmark@frontiernet.net]
Sent: Friday, June 29, 2012 8:58 AM
To: rogue.fallchinook@state.or.us
Subject: chetco river

Dear Oregon Department of Fish and Wildlife:

I'm writing to ask ODFW to revise the allowable composition of hatchery produced fall chinook salmon in the Chetco River from the current 18 percent to 5 percent. Five percent is more consistent with other streams in the Coastal River Stratum (see page 109 of the draft plan) and with the State of Oregon's Native Fish Conservation Policy. ODFW has not provided any scientific justification for allowing such a high percentage of hatchery fish in the Chetco River. On the other hand there is significant information about the negative interaction between hatchery fish and native, naturally reproducing populations. See for example Native Fish Society's science and research page. The priority for the Chetco, and other rivers in the Coastal River Stratum, should be to preserve the integrity of the wild fish populations that are so important, long-term, to a stable local economy and to the ecology of the rivers and streams of the Wild Rivers Coast.

Sincerely,

Beth Peterson

From: BccOrElse@frontiernet.net [mailto:BccOrElse@frontiernet.net]
Sent: Friday, June 29, 2012 10:33 AM
To: rogue.fallchinook@state.or.us
Subject: Comments — Draft Management Plan for Fall Chinook Salmon

Dear Oregon Department of Fish and Wildlife:

We are writing to request that ODFW make revisions to the allowable composition of hatchery produced fall chinook salmon in the Chetco River from the current 18 percent down to 5 percent. Five percent is more consistent with other streams in the Coastal River Stratum (see page 109 of the draft plan) and with the State of Oregon's Native Fish Conservation Policy. ODFW has not provided any scientific justification for allowing such a high percentage of hatchery fish in the Chetco River. On the other hand there is significant information about the negative interaction between hatchery fish and native, naturally reproducing populations. See for example Native Fish Society's science and research page. The priority for the Chetco, and other rivers in the Coastal River Stratum, should be to preserve the integrity of the wild fish populations that are so important, long-term, to a stable local economy and to the ecology of the rivers and streams of the Wild Rivers Coast.

Sincerely,

Gloria and Bob Ziller

PO Box 419

O'Brien, OR

97534

From: Yvonne Maitland [mailto:ymmaitland@gmail.com]
Sent: Friday, June 29, 2012 4:59 PM
To: rogue.fallchinook@state.or.us
Subject: Fwd: ODFW Fall Chinook conservation plan

From: **Yvonne Maitland** ymmaitland@gmail.com
Subject: ODFW Fall Chinook conservation

Dear Tom Satterthwaite and to whom it may concern,

The management of hatchery fish in the Chetco River is not consistent with that of other coastal rivers in Curry County. ODFW's draft fall chinook conservation plan, allows a much higher percentage of hatchery fish in the Chetco River, out of all other populations in the Rogue Species Management Unit (SMU). WHY?

Has ODFW provided the best scientific data regarding these high numbers (18%)? Perhaps these numbers should be shared with NMFS for peer review. I think we all support the integrity and health of Chetco River's wild chinook salmon runs which must be fully considered by all parties.

ODFW's Oregon South Coast River Basin Fish Management Plan/Working Draft, 15 June 1995, Introduction page 3 "the Oregon Department of Fish and Wildlife has only limited ability to affect conservation of fish populations. This Agency, in reality, has authority only to operate hatcheries and manage harvest of populations..."

I sincerely believe that habitat protection on the Chetco River is not an ODFW priority. ODFW's response to problems has always been more hatchery fish! Under the Oregon Plan for Salmon and Watersheds, "Aquatic habitat restoration activities are key to the success to the Oregon Plan for Salmon and Watersheds (CPSW)." Is there a restoration plan for the Chetco River? The Chetco, unlike the the Rogue River does not have Total Maximum Daily Loads as required by DEQ and EPA.

It is interesting to note the, "Department of State Land records for 2003 reveal that over the couple of years of records, the Columbia, Willamette, Umpqua and Chetco rivers host the bulk of the in-stream gravel operations." (page 25 - Aggregate Resources in Oregon Policy Briefing Memo - Governor's Office. May 4, 2007.) Where was our local ODFW regarding salmon and the years of over-mining that the Chetco river endured.

Short-term gain of fishing interests by recommending high percentages of hatchery fish in the Chetco River opposes long-term benefits of preserving the integrity of Oregon's wild native wild fish populations.

Thank you for the opportunity to comment.

Sincerely,

Yvonne Maitland

ODFW
Rogue Watershed District
1495 East Gregory Road
Central Point, OR 97503

SENT VIA EMAIL: rogue.fallchinook@state.or.us

RE: Draft conservation plan for fall Chinook salmon in the Rogue SMU

Dear ODFW,

Thank you for this opportunity to comment on ODFW's draft conservation plan for fall Chinook salmon in the Rogue Species Management Unit.

Rogue Riverkeeper is a non-profit organization whose mission is to protect and restore water quality and fish populations in the Rogue Basin and adjacent coastal watersheds. Rogue Riverkeeper, our parent organization, the Klamath-Siskiyou Wildlands Center, and our more than 3,000 supporters, use and enjoy the Rogue River, its tributaries and other coastal watersheds.

We request notification at the address below regarding any developments or decisions related to this draft plan or any other ODFW conservation plan in southwest Oregon.

Artificial Barriers

We fully support an emphasis on the removal of artificial barriers to increase NP CHF habitat.

Habitat

Gravel mining in the Lower Rogue—Reliance on 1944 surveys to conclude that "gravel abundance is probably generally not a primary factor that limits NP CHF production in the Rogue River Basin" fails to assess the impacts of gravel mining on spawning gravels in the Lower Rogue over the last six decades. The draft plan states on page 47 that spawning gravels appear to be the lowest in the Lower Rogue population area. The impacts of gravel mining, both current and future, need to be more thoroughly considered in this plan.

Sediment and suction dredging —Sediment deposition on redds is well documented to harm gravel quality in spawning areas and salmon survival rates. Suction dredge mining has dramatically increased in the last few years in Oregon, particularly in the Rogue SMU. A suction dredge moratorium was put in place in California until at least 2016 due to impacts on streams

and fish. However, recent action in California lifted that date so the moratorium is in place indefinitely. As a result, the increase in dredge mining in southwest Oregon will likely continue in the years to come. ODFW needs to better address the impacts of dredge mining, its concentrations in the Rogue Basin and lack of enforcement funding on efforts to recover species and implement the goals of fish conservation plans.

ODEQ Phase II stormwater program—ODFW states on page 121 that is supports local government's participation in the Phase II program. Currently, Grants Pass, Eagle Point and Gold Beach are not participants in the program, but certainly should be in order to minimize those municipalities' impacts on peak flows and stormwater pollutants that discharge to the Rogue and several tributaries. ODFW should demonstrate support for Grants Pass, Eagle Point and Gold Beach to be included in the program.

Native predators

We do not support any program that harasses or kills native predators such as pinnipeds or cormorants.

Hatchery fish

There is significant information about the negative interaction between hatchery fish and native, naturally reproducing populations.

Please revise the allowable composition of hatchery CHF in the Chetco River from the current 18 percent to 5 percent and in the Lower Rogue from 10 percent to 5 percent. Five percent is more consistent with other streams in the Coastal River Stratum and Rogue Stratum, respectively (see pages 108-109 of the draft plan) and with the State of Oregon's Native Fish Conservation Policy.

ODFW has not provided any scientific justification for allowing such a high percentage of hatchery fish in the Chetco or Lower Rogue Rivers. The priority for the Chetco and Rogue should be to preserve the integrity of the wild fish populations that are so important to the long-term health and stability of local economies and to the ecology of the rivers and streams of southwest Oregon.

Thank you,

Lesley Adams, Program Director

Rogue Riverkeeper —PO Box 102, Ashland, Oregon 97520—541.488.9831—**www.rogueriverkeeper.org**

-----Original Message-----
From: Suzanne Young [mailto:fishawk51@hotmail.com]
Sent: Friday, June 29, 2012 10:24 PM
To: rogue.fallchinook@state.or.us
Subject: Hatchery vs wild

Since there is no science supporting a run of 18 Percent hatch origin in a wild Chetco fall chinook that says this will help the native origin thrive, we support a number similar to the windchuck which is less than 10 percent hatch. Further more a 5 percent hatch would be consistent with the other waterways in the area and support the protection on the native fish policy.

Thank you for your time

Harvey Young

Fishawk River co.

From: Chris Kuper [mailto:christiekuper@yahoo.com]
Sent: Sunday, July 01, 2012 4:22 PM
To: rogue.fallchinook@state.or.us
Subject: ODFW's draft management plan for fall chinook

Dear Oregon Department of Fish and Wildlife:

I'm writing to ask ODFW to revise the allowable composition of hatchery produced fall chinook salmon in the Chetco River from the current 18 percent to 5 percent. Five percent is more consistent with other streams in the Coastal River Stratum (see page 109 of the draft plan) and with the State of Oregon's Native Fish Conservation Policy. ODFW has not provided any scientific justification for allowing such a high percentage of hatchery fish in the Chetco River. On the other hand there is significant information about the negative interaction between hatchery fish and native, naturally reproducing populations. See for example Native Fish Society's science and research page. The priority for the Chetco, and other rivers in the Coastal River Stratum, should be to preserve the integrity of the wild fish populations that are so important, long-term, to a stable local economy and to the ecology of the rivers and streams of the Wild Rivers Coast.

Sincerely,

Christie Dunn

10398 Takilma Rd

Cave Junction, OR 97523

From: Romain Cooper [mailto:romain@frontiernet.net]
Sent: Sunday, July 01, 2012 11:37 PM
To: rogue.fallchinook@state.or.us
Subject: re: Rogue - Chetco Chinook draft conservation plan

Dear ODFW,

Background:

My name is Romain Cooper. I live in Josephine County but recreate in Curry County a good deal and for over 40 years. I fish for Chinook salmon. The Sixes is my favorite stream but the Chetco is number 2. I live on the East Fork of the Illinois River and have for 42 years. Our property includes 3/4 mile of East Fork river frontage and about one mile of the trib, Scotch Gulch Creek, which is an important coho spawning and rearing creek. (We have had up to 73 adult spawners in this mile of creek and average about 25 spawners.) We have placed a conservation easement with Souther Oregon Land Conservancy to protect the ~220 acre property's natural values and, in particular, the coho spawning, rearing and migratory habitat.

Regarding ODFW's **CONSERVATION PLAN FOR FALL CHINOOK SALMON IN THE ROGUE SPECIES MANAGEMENT UNIT**, I'd like to make 3 points:

Chetco River:

As we all know, the Chetco is an exceptional fishing river for both chinook and steelhead. The chinook salmon resource is so important to the area's ecology and its natural values. It is also extremely important to the economy of Curry County.

I am heartened that ODFW is concerned and actively planning to conserve this world class fishery.

However, (in my opinion) one aspect of ODFW's Chetco management policies is detrimental to the long term health & viability of the Chetco's chinook run. This is the "hatchery component". It is ill-advised to keep dumping hatchery-reared chinook for the Elk River hatchery into the Chetco. The negative impacts and risks (loss of genetic integrity, disease, competition with wild-spawned fish, etc.) exceed the benefits of the the extra juvies.

Please introduce and analyze alternatives that decrease the percent of hatchery fish at a steady pace until this unwise and fiscally wasteful practice has ended. Remember, the Chetco is relatively good shape with copious spawning and rearing habitat. This is why I'm baffled that the Chetco is allocated a larger percent of hatchery to wild than most Oregon coastal streams (as I am led to understand)? Is this just an artifact of it's geographic closeness to the Elk River facility?

Put the resources (money) that's spent on this hatchery program to instead conserve natural spawning and rearing habitat on the Chetco.

Illinois River:

The best, most productive spawning habitat for Illinois River fall chinook is in the alluviated Illinois Valley. By the time the chinook reach the valley they are mostly "dark" and unfit for angling and human consumption. Unfortunately, a good bit of poaching (which I have witnessed personally several times) goes on to the detriment of this fish stock. The situation is made worse by the ODFW regulations that allow for (steelhead) fishing in December. This makes the closed season on chinook hard to enforce. The Steelhead season should NOT begin until January 1. By then the Chinook run is history (and coho are about finished as well). Plus there are very few steelhead in the upper part of the Illinois at that time. ODFW could keep the season timing as is for the lower river (say up to Indigo Creek, Briggs Creek?) but make the change for the road accessed part of the canyon and for the valley parts of the Illinois.

Catch & Release:

When it comes to Chinook, fishermen like to eat some of their catch. Please continue to allow this practice. I support conservative limits including a max number per year per fisherman. But to go to a "catch & release only" fishery will cause many fishermen (including myself) to drop out.

Thank you for considering my comments.

respectfully,

Romain Cooper

Romain Cooper
10398 Takilma Road
Cave Junction, OR 97523
541-592-2311

From: Peter Tronquet [mailto:petert@bierson.com]
Sent: Friday, June 29, 2012 1:10 PM
To: Todd.A.Confer@state.or.us
Subject: CHS Conservation Plan Draft Comments

Good afternoon Todd,

I want to document the position of the Native Fish Society as regards the Chetco River and the Rogue SMU Fall Chinook Conservation Plan draft.

Chetco River Desired Biological Status: Hatchery fish should compose no more than 10% of the naturally spawning fall Chinook salmon.

Chetco River Conservation Status: Hatchery fish compose more than 15% of the fall Chinook salmon that spawn naturally.

The draft makes the statement on page 137 that the Conservation Criteria for the coastal stratum "represents a coordinated product that was supported by all nine members of the advisory committee…"

That statement is not accurate, as both the Native Fish Society and the Audubon Society objected to the 20% hatchery criteria.

Please correct the draft to include my objections to the Committee and ODFW criteria as regards the Chetco.

Thank you,

Peter

Peter Tronquet

Chief Financial Officer

petert@bierson.com

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Central Point, OR 97502
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WILD RIVERS COAST CHAPTER

Serving S. Oregon & N. California.

P.O. BOX 421 SMITH RIVER, CA. 95567

Tom Satterthwaite **June 29, 2012**

Oregon Department of Fish and Wildlife

3406 Cherry Avenue NE

Salem Oregon 97303

Dear Mr. Satterthwaite,

The Wild Rivers Chapter of Trout Unlimited is justifiably concerned with the increased emphasis in hatchery production on the Oregon South Coast, especially the Chetco River.

The Oregon Chapter of the American Fisheries Society and Trout Unlimited have questioned the wisdom of continued hatchery influences on smaller coastal rivers.

With approximately 150 wild Chinook taken from the river each year to provide the brood stock for the hatchery, natural selective influences and ability to survive in the natural environment are manipulated through the timing of collection, unnatural mate selection, the rearing process, unnatural feeding behavior, and other negative influences have been called into question by biologists who specialize in salmon genetics and behavioral studies.

Yet their warnings of the dangers of genetic *bottle-necking* and *species resilience* are largely ignored by the general public, and surprisingly some biologists. The threat of flooding the genetic pool with the offspring of hatchery, now estimated at over 15% of the spawning chinook, is a very real and growing problem.

To reduce these realized threats the numbers of hatchery fish need to be reduced in the Chetco River. Natural production through conservation and restoration of essential habitats is paramount. These include the lower tributaries and mainstem, as well as the estuary and floodplain. These features have all identified as limiting factors for salmon production especially the Chetco and Winchuck River. Juvenile residency time must be increased as well as their average size. We must focus on these numbers not hatcheries.

The stressors and critical habitat continues to diminish with human developments.

The ODFW must address these issues to conserve Chinook for the next 99-years.

Relying upon non-regulatory efforts without increased legal protections for these habitats may not be enough to assure this agency mandate. Land acquisition and riparian protection and restoration are essential to the long term survival of all Chetco fish.

We hope these action points will assist in the development of long-term goals for higher natural production and habitat for our salmonids.

Sincerely Stan Easley/ Native American Representative

Chetco River
Watershed Council

EIN#271163453
PO Box 882
Brookings OR 97415

"Stewardship and Advocacy"

June 20, 2012

Todd Confer
Oregon Department of Fish & Wildlife
P.O. Box 642
Gold Beach
Oregon 97444

Dear Mr. Confer,

The Chetco River Watershed Council would like to outline our concerns with the Draft Conservation Plan alternatives for the coastal stratum alternatives. The continued downward trend of these populations is insufficiently addressed by these two plans and will not guarantee that critical fish habitat needs are filled or that these populations will be viable for the next 99 years.

Clearly we need a better vision for how to conserve and restore fish habitat in the Chetco River and Estuary. The fall and spring run Chinook are in trouble with no clear solutions and tough decisions to be made to protect these dwindling runs. The Fish and Wildlife Commission needs to focus on restoring the limiting factors for wild salmon production and move away from hatchery influences upon the fisheries. Hatchery releases must be reduced to help reverse the genetic and population trend. Our major concerns are:

1) **Habitat Restoration and Protection.** ODFW support for 'only' non-regulatory cooperative conservation measures without providing for other options including imposing new land-use regulations will restrict the ability of resource agencies to address expanding human impacts. Future habitat conservation and restoration must address the '*primary limiting factors*' for wild chinook production. These include degraded estuary habitat and water quality, ever increasing reduced floodplain connectivity and function and loss of floodplain to developments. The legal protection of '*essential fish habitat*' in Chetco River tributaries is required. It is unrealistic to propose or assume that "efforts to improve habitat for fish through on-the-ground, non-regulatory work by community-based entities and individuals" will be effective. The resource extraction industry will not do anything voluntarily to reduce their profits by donating land or reducing impacts upon the tributaries without regulation.

Restoration of floodplain processes is critical to long-term management plans. Ephemeral floodplain habitats provide best growth conditions for juvenile salmon. Both survival and growth rates of fish using these habitats are 2-6X greater than fish using mainstem habitats. Critically, more fish develop above the *'threshold size'* needed for ocean survival. Winter off-channel habitat is one of the most important and least appreciated factors influencing survival of juvenile salmon. Land owners must be compensated at market value to provide conservation easements and restrict highly destructive floodplain housing developments. Floodplain acquisition is of the highest priority, the owner *willing or not*.

2) Hatchery Management Practices Increased hatchery inputs are detrimental to the long-term persistence of salmon in many ways. Not only does it mask the problem of a declining native population but the taking of increased numbers of wild chinook from the Chetco for this expanded program are counter-productive and detrimental to genetic variability and long-term persistence of the species in the wild. The results of current genetic and behavioral studies are alarming and the science is ignored at everybody's peril.

Currently ~~almost~~ it is estimated that about 15% of spawning chinook in the Chetco are from Elk River hatchery origin. Future plans to increase the numbers of hatchery releases would be counter-productive and *flies in the face* of current fisheries science. ODFW must not rely upon future hatchery fish numbers to calculate the harvestable take allowance now at 50% of the annual Chinook run. With the future of hatcheries in small coastal systems in serious question, we must not rely upon them to boost numbers of catchable fish by sacrificing the unique genetic variability of these populations. Hatchery influences need to be reduced not increased, it merely masks a growing problem like a band-aid.

3) Recreational and Commercial Fisheries Management Fishing pressure increases dramatically each year with fishing guides and recreational fisherman from other regions now flocking to the Chetco due to the dwindling stocks in their local rivers. The numbers of drift boats and bank fishermen inflict a heavy toll that is severely under estimated. In early fall under low-flow conditions salmon run a gauntlet of fisherman in the lower river. The numbers of gravid females taken for egg bait also threatens the continued survival of the native fishery, and may need to be restricted in the future. This option must be left open for fishery managers.

The prospect of eventual *catch and release* restrictions will have devastating impacts on the Brookings economy as fishing tourists may leave for other rivers where they can take a wild fish. We must not let this happen to a region so heavily dependent on recreational fisherman. Many feel the number of fishing guides should be limited on the Chetco, an option that must not be ruled out.

To conclude, the CRWC trusts that the Oregon Wildlife Commission will research the threats posed by excessive hatchery smolt influences and continued loss of essential fish habitat from floodplain developments and destructive land use practices including gravel mining impacts on water quality in spawning tributaries and rearing habitat in the lower mainstem and estuary.

We hope our recommendations and their supporting rationale will be seriously considered as guidance to implement the steps necessary to achieve the new ODFW visions of habitat conservation and restoration on the Chetco River.

Sincerely,

Carl Page

Fisheries Biologist
Chetco River Watershed Council

USDA United States Department of Agriculture | Forest Service | Rogue River-Siskiyou National Forest | Supervisor's Office 3040 Biddle Road Medford, OR 97504-4119

File Code: 2670
Date: June 28, 2012

Dan Van Dyke
Rogue District Fish Biologist
Oregon Department of Fish and Wildlife
Rogue Watershed District
1495 East Gregory Road
Central Point, OR 97502

RE: Comments for the Rogue Fall Chinook Salmon Species Management Unit Draft 2012 Conservation Plan

Dear Mr. Van Dyke:

Thank you for inviting us to review the draft Recovery Plan for the Rogue Fall Chinook Salmon Species Management Unit Draft 2012 Conservation Plan. The Recovery Plan was well documented with data and research findings and in setting a course for the recovery of Rogue Fall Chinook salmon in the Rogue Basin. The Forest has over 500 miles of fall Chinook salmon habitat and is an important species in most of the Forest's watersheds and immensely important to the health of these ecosystems. Most of our hydrology and fisheries restorative work has directly targeted recovery of salmon habitat on and off the Forest.

National Forest System lands will continue to be managed with special consideration for watersheds and habitats where current or potential anadromous fish habitat exists under the auspices of the Rogue River-Siskiyou National Forest Land and Resource Management Plan as amended by the Northwest Forest Plan (NFP). We perceive our NFP as one of the most proactive forest conservation plans in the world given the intent and extent of this planning document to millions of acres of public lands and thousands of miles of streams and rivers. The structure of the NWP and its Aquatic Conservation Strategy provide the basic foundation for the protection and conservation of anadromous fish species. The NWP will guide our management for continued recovery of these salmon habitats. However, downstream habitats so important to achieve the escapement numbers necessary for salmon recovery will likely remain in degraded condition with climate change adding extra environmental pressures to these habitats. Rehabilitating and/or protecting large portions of valley stream reaches downstream with riparian setbacks, changes in water rights law and changes in land uses on private lands is where the need is paramount.

Restoration projects on the Forest and on private lands with our partners are planned and implemented with extreme care and consideration towards the important salmon and trout populations that inhabit our streams. We have developed and are developing Watershed Restoration Actions Plans (WAP) at the 5th and 6th field watershed level, which emphasize salmon areas. We are working with watershed councils, State and Federal agencies and individual citizens as best we are able given funding and staffing limits to rehabilitate important salmon habitats and provide refugia areas for further population recovery, in addition to providing high quality water for habitats downstream of National Forest System lands.

The social and restorative efforts in developing these WAPs provide greater buy-in, support, and tangible results in protecting and improving habitats for salmon throughout the watersheds.

I want to reiterate the Rogue River-Siskiyou National Forest's support for the recovery plan. This salmon species is integral to forests and ecosystems in southwest Oregon. The diverse fish and wildlife habitats and populations on the Forest will benefit greatly from recovery of this very important species. Please don't hesitate to contact Susan Maiyo, our Forest Fisheries Biologist (541) 618-2052 for assistance needed during this effort. We welcome continuing a partnership with the Oregon Department of Fish and Wildlife toward working on Chinook salmon habitat recovery.

Sincerely,

/s/ Virginia M. Gibbons (for)
ROBERT G. MACWHORTER
Forest Supervisor

cc: Scott C Woltering
Susan J Maiyo

Oregon Department of Fish and Wildlife Responses to Written Comments Submitted on the April 25 Draft Conservation Plan for Fall Chinook Salmon in the Rogue Species Management Unit

References to pages or appendixes are applicable to the draft plan dated April 25, 2012, unless otherwise noted.

Response to comments submitted by Richard Nawa, Klamath Siskiyou Wildlands Center:

1. No, the Draft Conservation Plan for Fall Chinook Salmon in the Rogue Species Management Unit (SMU) does not address incidental mortality of coho caused by Chinook fisheries. Risk factors for Southern Oregon/Northern California Coast coho would be more appropriately addressed in a conservation plan for coho in the Rogue Species Management Unit.
2. PRIMARY LIMITING FACTORS, pages 45-106, assesses factors that potentially impact the abundance and life history of fall Chinook in the Rogue SMU, including habitat factors. The assessment was developed based on: 1) published research reports specific to naturally-produced fall Chinook populations and allied habitat in the SMU, 2) analysis of unpublished data retrieved from ODFW files, 3) published research reports on Chinook populations and allied habitat outside of the SMU. Alternate suites of management strategies were developed to manage the factors deemed to be primary factors that limit the abundance and expression of life history strategies of naturally-produced fall Chinook in the Rogue SMU.
3. Management Action A8(a) (ODFW supports the removal of artificial barriers to the upstream migration of adult fall Chinook and pursues improvement of upstream passage at those barriers that cannot be removed.) is common to all Management Alternatives.
4. The stated support for prioritizing migration barriers in the Illinois Basin is noted.
5. The stated support for curtailing freshwater harvest to protect late migrating fall Chinook of Illinois River origin is noted.
6. The need to monitor naturally-produced fall Chinook that spawn in each population area of the Rogue stratum is identified in MONITORING, EVALUATION, AND RESEARCH NEEDS, page 140.

Response to comments submitted by Ann Vileisis, Kalmiopsis Audubon Society:

1. The stated preference for Rogue Stratum Alternative 4 is noted.
2. The stated opposition to Management Action A12(d) (initiate a program to decrease cormorant densities in the Rogue River Estuary), and Rogue Stratum Alternatives 3 and 5, which include Management Action A12(d), is noted.
3. The stated preference for Coastal Stratum Alternative 6 is noted.
4. Yes, Native Fish Conservation Policy interim criteria OAR 635-007-0507) identifies an upper limit of 10% hatchery contribution to the natural spawning population, while the draft conservation plan identifies a Desired Status criterion for spawner composition in the Chetco fall Chinook population of up to 18% (10 year average). Interim criteria apply to populations prior to the approval of a conservation plan. Criteria adopted in a conservation plan may vary from the interim criteria to account for circumstances specific to each Species Management Unit (and constituent populations).

With the estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

Response to comments submitted by Beth Peterson:

1) The request to reduce the Desired Status Spawner Composition Criteria for the Chetco fall Chinook population from the proposed 18% to 5% is noted.

   With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

Response to comments submitted by Gloria and Bob Ziller:

1) The request to reduce the Desired Status Spawner Composition Criteria for the Chetco fall Chinook population from the proposed 18% to 5% is noted.

   With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

Response to comments submitted by Yvonne Maitland:

1) A Management Strategy, and allied Management Actions A7(c), A7(d), A7(e), A9(b), A10(b), A8(a), A11(a) in Appendix G and A1(a), A1(g), A3(a), A3(b), A7(d), A3(c), A7(e), A1(f), A1(h), A1(i), A2(a) in Appendix H, that support restoration, maintenance and enhancement programs to ensure that aquatic and terrestrial habitat is managed to maintain productive populations of naturally produced fall Chinook salmon is common to all Management Alternatives.

2) With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

Response to comments submitted by Leslie Adams, Program Director, Rogue Riverkeeper:

1) The Limiting Factors Assessment – Rogue Stratum (pages 46-71) identifies: 1) water temperature during adult migration; 2) water temperature during juvenile rearing; 3) the intensity of peak flows during incubation in the gravel; 4) brood harvest rates during periods of low abundance; 5) low spawning escapement as the primary factors that limit abundance and expression of life history strategies of the naturally-produced fall Chinook populations in the Rogue stratum. Spawning habitat does not appear to be a primary limiting factor.

   Primary spawning areas in the Lower Rogue population area are located in tributaries, mostly Lobster and Quosatana creeks, approximately 7 and 10 miles, respectively, upstream from currently permitted aggregate mining operations. Localized habitat alterations caused by downstream aggregate mining operations are not likely to impact primary spawning areas in the Lower Rogue population area.

   Potential impacts of aggregate mining, and other removal/fill activities in State waters, are considered as part of the regulatory process overseen by the Department of State Lands. Management Action A9(b), common to all Management Alternatives in the Draft Conservation Plan, identifies ODFW's role in reviewing land use activities, including aggregate mining operations.

2) The Limiting Factors Assessment – Rogue Stratum (pages 46-71) identifies: 1) water temperature during adult migration; 2) water temperature during juvenile rearing; 3) the intensity of peak flows during incubation in the gravel; 4) brood harvest rates during periods of low abundance; 5) low spawning escapement as the primary factors that limit abundance and expression of life history strategies of the naturally-produced fall Chinook populations in the Rogue stratum. Spawning habitat does not appear to be a primary limiting factor. Suction dredge mining appears to have increased in

the Rogue Basin in recent years, especially small-scale recreational dredging for gold. However, the localized impacts of small-scale suction dredging activities is not likely a primary factor that could possibly limit attainment of desired status for the Rogue fall Chinook populations.

Potential impacts of suction dredge mining, and other activities in State waters, are considered as part of the regulatory processes overseen by the Department of Environmental Quality and Department of State Lands. Management Action A9(b), common to all Management Alternatives in the Draft Conservation Plan, identifies ODFW's role in reviewing land use activities, including aggregate mining operations.

3) Management Action A10(b) is common to all Management Alternatives for the Rogue Stratum. Management Action A10(b) states: ODFW supports local government's participation in Oregon's Phase II Municipal Stormwater Program; which is administered through ODEQ. This program is designed to reduce the amount of stormwater pollutants discharged into streams.

4) The stated opposition to Management Action A12(d) (initiate a program to decrease cormorant densities in the Rogue River Estuary), and Rogue Stratum Alternatives 3 and 5, which include Management Action A12(d), is noted.

5) The request to reduce the Desired Status Spawner Composition Criteria for the Chetco fall Chinook population from the proposed 18% to 5% and the Lower Rogue fall Chinook population from the proposed 10% to 5% is noted.

   With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

   With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Rogue populations (Spawner Abundance:, page 60), a hatchery component of up to 10% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Lower Rogue fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Lower Rogue fall Chinook population are common to all Management Alternatives. Management Actions include: E1(b) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

Response to comments submitted by Harvey Young:

1) The request to reduce the Desired Status Spawner Composition Criteria for the Chetco fall Chinook population from the proposed 18% to 5% is noted.

   With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

Response to comments submitted by Christie Dunn:

1) The request to reduce the Desired Status Spawner Composition Criteria for the Chetco fall Chinook population from the proposed 18% to 5% is noted.

   With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

Response to comments submitted by Romaine Cooper:

1) The request for a decrease in the percent hatchery fish in the Chetco fall Chinook population is noted.

   Prior to 1998 the proportion of hatchery-produced fall Chinook in the natural spawning population of the Chetco River averaged 33% (Appendix E, page 201). Changes to the hatchery program at that time, designed to minimize genetic and ecological impacts to naturally-produced (wild) fall Chinook, resulted in a reduction in the proportion of hatchery-produced fall Chinook in the natural spawning population to an average of 16% (1998-2011). In addition to previously implemented changes, Management Actions included in the Draft Conservation Plan designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise

broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

2) The recommendation to close the steelhead fishery in the Illinois prior to January 1 in order to protect fall Chinook is noted.

3) Managing under current Zone Regulations (which would maintain the consumptive fishery for fall Chinook) is common to all Rogue Stratum Management Alternatives.

Response to comments submitted by Peter Tronquet, Native Fish Society:

1) The stated support for the Chetco River Desired Biological Status for Spawner Composition of no more than 10% is noted.

   With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

2) The stated support for the Chetco River Conservation Status for Spawner Composition of no more than 15% is noted.

3) The objection to the draft language is noted. The language of the "conservation criteria" section on page 137 has been revised to read: <u>Similarly, the following statement of conservation status criteria for NP CHF populations in the coastal stratum (Table 49) represents a coordinated product that was supported by nine advisory committee members (for all conservation status criteria except Chetco River spawner composition) and by ODFW. Two advisory committee members objected to the Chetco River spawner composition conservation criteria of 20% and advocated for a lower proportion.</u>

Response to comments submitted by Stan Easley/Native American Representative, Trout Unlimited, Wild Rivers Coast Chapter:

1) The request to reduce the size of the hatchery program for the Chetco fall Chinook is noted.

   With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not

likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

2) A Management Strategy, and allied Management Actions, that support restoration, maintenance and enhancement programs to ensure that aquatic and terrestrial habitat is managed to maintain productive populations of naturally produced fall Chinook salmon is common to all Management Alternatives.

Response to comments submitted by Carl Page, Chetco River Watershed Council:

1) A Management Strategy, and allied Management Actions A7(c), A7(d), A7(e), A9(b), A10(b), A8(a), A11(a) in Appendix G and A1(a), A1(g), A3(a), A3(b), A7(d), A3(c), A7(e), A1(f), A1(h), A1(i), A2(a) in Appendix H, that support restoration, maintenance and enhancement programs to ensure that aquatic and terrestrial habitat is managed to maintain productive populations of naturally produced fall Chinook salmon is common to all Management Alternatives.

2) With an estimated persistence probability of 99% over 100 years (VIABILITY OF THE SPECIES MANAGEMENT UNIT, page 111), and the productivity of the Chetco population (Chetco Population:, page 89), a hatchery component of up to 18% in the natural spawning composition is not likely a primary limiting factor that could possibly limit attainment of desired status for the Chetco fall Chinook population. In addition, Management Actions designed to minimize genetic and ecological impacts to the naturally-produced Chetco fall Chinook population are common to all Management Alternatives. Management Actions include: C1(b) establishment of an acclimation and collection facility; A6(c) release hatchery fall Chinook smolts after September; C1(c) revise broodstock practices to produce hatchery fish that mature at more natural ages; E1(c) continue implementation of the Hatchery and Genetic Management Plan.

3) A Management Strategy, and allied Management Actions A14(b), A14(c), A13(a), A13(b) in Appendix G and A8(b), A8(c), A7(a), A7(b), A7(c), A7(d), A8(d), A7(e0, A8(e) in Appendix H, to manage recreational and commercial fisheries to sustain productivity for all populations of naturally produced fall Chinook salmon, and to provide harvest opportunities for recreational and commercial fishers, is common to all Management Alternatives.

Response to comments submitted by Robert G MacWhorter, Rogue River-Siskiyou National Forest Supervisor:

1) The stated support for the conservation plan is noted.