

WITNESS REGISTRATION

Oregon Fish and Wildlife Commission

June 5-6, 2014, Oregon Department of Fish and Wildlife, Salem, Oregon

EXHIBIT K

PUBLIC HEARING ON: **EXHIBIT K: Coastal Multi-Species Conservation and Management Plan**
 (Note: Stakeholders Groups will testify first before the Commission)

NAME (Please Print)	MAILING ADDRESS (Please Print)	AFFILIATION (Please Print)	TELEPHONE (Please Print)
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Bruce Bertrand	926 N. 10 th St Coos Bay, OR 97430	South Coast Anglers STEP ASSOC.	541-297-4469
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PETER TRONQUET	233 MT ECHO MEDFORD	NFS, STEAMBOATERS TNUF	541-261-5041
Tim Myron	POB 676 Camb, 97003	Native Fish Soc	503-819-5589
Kee Ferguson	2130 Dolphin St, Springfield 97472	Steamboaters	541-747-4917
STEVE EVANS	2744 Kismet Way Eugene 97405	STEAMBOATERS	541-687-2150
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Stakeholders

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NAME (Please Print)	MAILING ADDRESS (Please Print)	AFFILIATION (Please Print)	TELEPHONE (Please Print)
X Averi Willow	355 Brindle Bug Rd. Tuleyld Park OR 97447	Steamboaters	(541) 498-2248
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X Lou Verdugo	3842 NW Estaview Pl OR 97330 COVENANTS	Caddis Fly Shop / Angler	541 740 1921
X Greg Walker	317 SW Alder Suite 502 Portland OR 97202	Pacific Rivers (am. l)	(503) 228-3055
X Guido Rahr	721 NW 9th Ave Portland OR 97216	Wild Salmon Canner	503-222-1204
X SCOTT AMERMAN	PO BOX 644 MORNING OR 97361	9. LETZ WAKESHIP Council CCA	503-606-3447
X Scott Howell	28 South Crowland Av Medford OR 97504	Angler / Guide	541 621 2818
X CARY LEWIS	607 FAWN DR Roseburg 97470	Angler / Guide	541-67-2246
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NAME (Please Print)	MAILING ADDRESS (Please Print)	AFFILIATION (Please Print)	TELEPHONE (Please Print)
X James F. Wright	PO Box 746 Lyons OR.	Salmon for Oregon	503-749-1150

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NAME <i>(Please Print)</i>	MAILING ADDRESS <i>(Please Print)</i>	AFFILIATION <i>(Please Print)</i>	TELEPHONE <i>(Please Print)</i>
X BRIAN McLACHLAN	7310 S.W. Ashendale DR. PORTLAND OR 97223		703 300 5940

June 10, 2014
Exhibit K

CMP Stakeholders to Testify

Mark Labhart – Tillamook Co. Commissioner

✓ Bruce Bertrand – South Coast Anglers

✓ Peter Tronquet – Steamboaters

✓ Guido Rahr (for Sara La Borde) – Wild Salmon Center

✓ Stan Steele – Guide, Corvallis

✓ Joe Rohleder – Public at Large

✓ Joe Ferguson – Steamboaters

✓ Bob Spellbrink, lives on Siletz

✓ Greg Haller – Pacific Rivers Council

✓ Grant Scheele – guide

* other stakeholders may show up after this list is submitted

* some may be late, depending on when comment starts

ANWS Commission Statement re CMP 6/6/14

Madame Chair, Director Elicker, esteemed Commissioners;

Thank you for providing this opportunity for public comment regarding the proposed Coastal Multispecies Plan.

For the record, I am Brad Halverson. I reside in Hillsboro, and am speaking on behalf of the Board of Directors for the Association of NW Steelheaders.

You are in receipt of our Position Statement, dated May 19, 2014; and it has been posted to your website under Attachment 7 to the CMP.

Therefore, my comments today will be brief but strategic, in that they stress the importance of select areas of concern to our constituents.

NW Steelheaders commends ODFW for their transparency in this policy planning, and the detailed vetting process undertaken with numerous stakeholder groups in various stratum. We appreciate their review process and the modifications made to the original draft based on public testimony.

We therefore endorse the CMP being presented for approval today; but feel a wider policy discussion leading to future refinements in the plan is warranted.

We favor the proposed sliding scale harvest based on predicted abundance.

We support the proposed Pilot Implementation Plan to channel resources and actions to those populations most in peril. But, feel it is ***imperative those actions in the two basins selected are monitored for efficacy, and extrapolated to other basins.***

We are disturbed by an apparent lack of baseline data upon which to formulate this plan. Further, it is not demonstrated in the Plan that the effects of coastal hatchery programs have been analytically assessed.

In order to better inform adaptive management actions, we urge a stronger commitment to monitoring and data collection; and applaud the proposed involvement of the Oregon Hatchery Research Center in this endeavor, but hope a focus will be to better understand the impacts of hatchery fish on wild fish abundance and productivity, with emphasis on ***abundance.***

While it is difficult for us to comment on the efficacy of a portfolio approach to managing the varied stratum under the plan, our constituents voiced considerable unease over the prospect of a significantly reduced quality angling experience due to shifting hatchery plants from basin to basin, and the overcrowding on already popular fisheries that will cause. It should not be construed that increased production necessarily equates to increased opportunity.

Finally, NW Steelheaders strongly advocates for the deferral of increased wild coastal winter steelhead retention, even "moderately increased" take. We question the data and modeling that would inform such a decision, and question its timing as well. The message of such an action could lead to the inference that our current conservation methods might not be wholly necessary. All stakeholder groups are working to blend increased conservation of wild populations with adequate harvest opportunity. This action undermines that objective.

Thank you for considering our concerns.

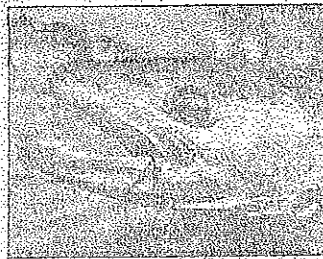
ALWAYS ON OREGONLIVE.COM

Scientists angle for a bit more bite in hatchery fish

By Jeff Barnard
Associated Press

Oregonian 4.29.14

In a lifetime of fishing for winter steelhead on Oregon's Alsea River, Stan Steele has seen it get harder and harder to hook into hatchery-bred fish. Instead, he has found he



JAMIE LUSCH/ASSOCIATED PRESS

Can steelhead be bred to bite? Researchers in Oregon plan to try, as hatchery steelhead — which greatly outnumber wild fish — have proved less willing to chomp on what anglers are offering them.

breed the bite back into hatchery steelhead.

Results won't be known for at least four years, but one thing is certain: It makes no sense for the state to spend \$25 million a year to produce fish for fishermen to catch

See Fish, A4

is more likely to hook the wild variety, whose numbers have declined.

A growing body of evidence is showing that Steele's experience is not some fish story, but the result of natural selection. Wild fish, which generally must be released unharmed, retain the aggression that will land them on the end of a hook easier than hatchery fish.

Prodded by fishermen, the Oregon Hatchery Research Center has agreed to see if it can

Fish

Continued from A1

if those fish won't bite.

"It's an exciting idea for us," said David Noakes, a fisheries professor at Oregon State University and senior scientist at the research center. "Depending on what the answer is, we might be changing a lot of things about raising hatchery fish and stocking hatchery fish."

Hatcheries have been taking the place of Mother Nature to produce salmon and steelhead in the West for more than 120 years. They are supposed to make up for overfishing and habitat lost to dams, logging, mining, agriculture and urban development.

To distinguish them from wild fish, hatchery fish have been marked since the 1990s by clipping a fleshy knob at the base of the tail called the adipose fin. Hatchery fish make up the vast majority of salmon and steelhead returning to rivers, but are not always the majority of those caught.

As scientific evidence has grown that hatchery fish are less likely to survive in the wild, and even contribute to declines of wild fish, many hatcheries have been mixing in wild fish to improve the gene pool.

Ryan Couture, the research center's director, said this would be their first attempt to breed a better biter.

So few steelhead returned to the Alsea this year that volunteer anglers did not turn in the 30 live wild fish needed to start the experiment, he said. They'll try again next year. It takes a year to raise the fish to be old enough to release, then two more years to return as adults.

It's in the genes

There is evidence that when it comes to biting, a fish is not just a fish.

A 30-year study, published in 2009, in Transactions of the American Fisheries Society on the effects of fishing on black bass in an Illinois lake showed that removing the aggressive fish that bite while defending

their nests during spawning season produces a population less likely to bite.

In short, the tendency to bite can be inherited, said David Philipp, the study's lead author and principal scientist at the University of Illinois' Illinois Natural History Survey.

"As you fish a population, you tend to catch the most aggressive ones. Oftentimes they are removed from the population. As a result, the population becomes less vulnerable to angling because it is less and less aggressive," Philipp said.

Just what makes a steelhead bite is something anglers can talk about for hours.

Steelhead — rainbow trout that go to the ocean to grow up — do not feed when they return to their native river to spawn. But they will still bite a clump of roe, a ball of yarn, a worm, a fly or a lure wiggling in their faces. Color seems to make a difference. So does size and movement.

Surveys of Deschutes River anglers since 1977 consistently show that wild fish account for the bulk of fish caught, even as their numbers have dwindled. In 2013, nearly six wild fish were caught for every hatchery fish, while hatchery fish outnumbered wild fish nearly 3-to-1.

The wild bite

On the Alsea, the first year of a three-year creel survey found that hatchery fish bred from wild parents were caught by fishermen three times more often than those bred from the hatchery's longstanding stock.

The biter experiment goes a step further, breeding fish exclusively from wild parents caught by fishermen, and comparing them with nonbiters that return to the hatchery.

Steele, a retired state police fish and game officer and fishing guide, has been the biggest contributor of wild fish to the experiment. As overall steelhead returns to the Alsea have declined, the proportion of wild to hatchery fish he catches has reached 3-to-1.

He hopes breeding better biters will ultimately mean fewer hatchery fish overall to compete with wild fish.

Exhibit K - Public Testimony Joe Ferguson
Friday, June 6, 2014

**Umpqua River Winter Steelhead Biological Assessment
(ODFW, 2003 – Page 21)**

Table 4 compares the population estimates for the various study designs conducted on the Umpqua Basin. The estimates for the population on run year 2002-03 are statistically similar, all within the 95% confidence interval. Our sample size for the telemetry and Peterson Mark/Recapture studies were limited due to budget constraints. These studies need to be conducted over several years and with larger samples. The district has the most confidence in the AUC spawning survey methodology. Whatever the study method, the counts at Winchester Dam are real time and extremely accurate. Therefore, the Telemetry and Peterson Mark/Recapture are reflective of Winchester Dam counts and thus adds further validity to these study population estimates.

Crater Lake's yearly snowfall declines

The recent annual average of 460 inches is more than 100 inches less than the average in the 1930s and 1940s

SALEM — You wouldn't know it from appearances, but Oregon's only national park has been losing snow.

Crater Lake National Park averaged 460 inches of snow each year between 2000 and 2013. Though that's plenty of powder for the thousands of cross-country skiers and snowshoers who visit each year, it's much less than what the park got in the 1930s and 1940s — when the annual average was more than 600 inches.

"The really surprising thing was seeing how much snow used to fall here in the 1930s and '40s," Crater Lake park ranger Dave Grimes told the Statesman Journal newspaper. "It has been a very gradual decline, but when you look at the numbers, it's something that definitely sticks out."

The measurements taken at the 6,540-foot level don't take into account the current season, the fourth-worst on record and 43 percent of normal as of Friday. Four seasons in the 1940s are also missing because of World War II.

Before 1930, the weather station was shuffled between lower and higher locations, so the snow totals are not considered reliable by those who track them.

The trend is important because snow, for a variety of reasons, is the lifeblood of the southern Oregon park, Grimes said.

"The first of which is that it provides water for Crater Lake itself," Grimes said. "One of the reasons it's considered the cleanest and clearest lake in the world is that it's mostly pure snowmelt."

The snowmelt also provides drinking water at the park, and seasonal water to the Rogue and Klamath basins for irrigation, fish, plants and wildlife. Grimes also noted that animals like voles and the snowshoe hare depend on snow for survival.

Rain is just not as valuable as snow because it just runs off right away and it's gone," Grimes said. "I think a lot of the really heavy rain we get in spring and fall used to fall as snow."

Abundance will be assessed annually (see Table A-III: 2 for population-specific abundance goals) to inform the adaptive actions related to abundance levels that have been established. The desired status for all populations, except the non-viable Chinook and spring Chinook populations (which required greater increases), is to achieve the 75th percentile of the observed abundances⁷⁶ over the period for which the populations were assessed (see Table A-III: 2). The 75th percentile was chosen, as opposed to a percentage increase, because it represents abundance levels that are both improved and attainable because percentiles standardize increases across populations and capture variability through time better than percentage increases of a mean (note that the 75th percentile values were greater than a 20% increase of the median [50th] percentile where it was used). The 75th percentile was used, as opposed to a value based on the stock-recruit relationship or PVA results, because most results indicated populations were already viable and, regardless of this, some improvements in populations are desired (which have the potential to change the future stock-recruit relationship and PVA results). The desire is to have a population's abundance be greater or equal to the goal half the time, rather than only a quarter of the time as it is now (i.e., in essence having the current 50th percentile move toward the current 75th percentile). This will provide for improved fishing opportunity and a buffer against future threats. Abundance goals for chum and cutthroat are based on increasing trends of peak density and anadromous counts at fixed locations because there are no population abundance data currently available to determine other goals.

Future Threats: Climate Change and Population Growth

A stationarity assumption was used in the current plan viability assessment. The stationarity assumption is that the future environment will be similar to the current environment. This assumption was used because of the uncertainty associated with future environmental conditions. Instead, the stationarity assumption was used. Given that it is generally believed that the future effects of climate change, resulting ocean shifts (e.g., productivity, acidification, sea-level rise), and human population growth and development⁷⁷ on these salmonid populations will likely be negative (ODFW, 2011), precautionary adjustments to all populations' abundance goals were made⁷⁸.

Productivity will be measured as the intrinsic productivity at low spawner abundances identified in a stock-recruit relationship. The identified productivity goals are based on observations across the Northwest of productivity within populations with low hatchery influence, which were assumed to have optimal intrinsic productivity (from Chilcote et al. 2011). Note that increases in productivity (as opposed to abundance capacity) or decreases in data variability are the primary ways that the Elk River Chinook population (which was not viable) and three of the four Chinook populations which had an extinction risk greater than 5% from one of the PVA models (i.e., the divergent PVA model results⁷⁹) will achieve acceptable extinction risks. See Figure A-III: 1 for a viability curve as an example showing the need for increased productivity (i.e., moving along the vertical confidence bar representing abundance does not change extinction risk, though moving along the horizontal bar representing intrinsic productivity does, as does shrinking the "sphere of results" representing variability).

Productivity will not be assessed annually. A long time series of data is necessary to estimate productivity, so re-estimating productivity after a few years will not show much change regardless of whether the true productivity is increasing or declining. To provide a more informative look at productivity, it will be assessed after 12 years - at the next status assessment (see **Implementation** for the timeframe).

⁷⁶ The percentile is of the log-normal distribution.

⁷⁷ Note that localized effects of climate change and human population growth would work through the limiting factors identified in this plan (e.g., water quality/temperature, water quantity, physical habitat quality).

⁷⁸ The increase in the abundance goal was chosen to provide increased societal benefits. It is also a temporary approach to buffer potential impacts of population growth and climate change. It is currently not possible to accurately estimate the level of productivity loss, if any, that populations will experience due to these factors. The increase was added to ensure that an increasing trend in population health would occur at the initial implementation of the plan to buffer against future negative impacts and allow time for actions addressing limiting factors through which these threats will occur to be taken. If goals are not able to be achieved, and especially if status starts to decline, the rate of actions will need to be increased in order to maintain current abundance levels, as well as prevent serious declines.

⁷⁹ Viability results for Floras indicated an increase in capacity or productivity were possible to decrease extinction risk. An increase in capacity is the primary need for South Umpqua spring Chinook.

Detailed Abundance Goals and Management Implications

Table A-III: 2. Population- and strata-specific abundances for Desired Status, sliding scale harvest decisions, observed range, and conservation decisions. Empty cells indicate that there are no data at the given scale. "TBD" indicates that additional data or analyses are needed to determine target abundances in the future. "---" indicates that there is no population, but angling in this area may be affected by the indicated harvest thresholds and conservation levels. "N / A" indicates that the metric is not applicable for the population or stratum. Light green shading indicates values that are for reference only (i.e., management decisions are not based directly on these).

SMU	Stratum	Population	WILD Spawners								
			Desired Abundance (75th)		High Harvest Threshold	Observed Abundance (50th)		Low Harvest Threshold	Critical Abundance		
CHINOOK	North Coast	Necanicum	34,500	TBD	TBD	24,300	9,900	TBD	9,100	TBD	
		Nehalem		12,100						3,800	
		Tillamook		10,500						3,700	
		Nestucca		11,900						1,600	
	Mid Coast	Salmon	55,000	TBD	40,600	TBD	1,200	400	14,700	400	
		Siletz								8,100	2,300
		Yaquina								9,600	2,200
		Alesea								9,300	2,900
		Yachats Aggregate								TBD	TBD
	Siuslaw	26,200	6,900								
	Umpqua	Lower Umpqua	6,500	TBD	4,300	TBD	---	---	1,500	TBD	
		Middle Umpqua								TBD	TBD
		North Umpqua								---	---
		South Umpqua								6,500	1,500
	Mid-South Coast	Tenmile	27,700	TBD	20,000	TBD	---	---	7,400	---	
		Coos								6,300	1,800
		Coquille								14,300	3,500
		Floras								700	100
		Sixes								4,400	1,200
		Elk								2,000	800
SMU Total	123,700	123,700	TBD	89,200	89,200	TBD	32,700	32,700			
SPRING CHINOOK	Umpqua	Lower Umpqua	5,200	TBD	3,500	---	---	2,000	---		
		Middle Umpqua							---	---	
		North Umpqua							4,600	2,000	
		South Umpqua							600	N / A	
SMU Total	5,200	5,200	TBD	3,500	3,500	TBD	2,000	2,000			
WINTER STEELHEAD	North Coast	Necanicum	21,800	5%	N / A	19,800	---	N / A	9,900	TBD	
		Nehalem								20%	600
		Tillamook								50%	TBD
		Nestucca								25%	TBD
	Mid Coast	Salmon	18,500	10%	N / A	14,400	---	N / A	7,200	TBD	
		Siletz								25%	TBD
		Yaquina								10%	TBD
		Alesea								25%	TBD
		Yachats Aggregate								10%	TBD
	Siuslaw	20%	TBD								
	Umpqua	Lower Umpqua	24,600	10%	N / A	19,100	---	N / A	8,200	TBD	
		Middle Umpqua								20%	TBD
		North Umpqua								40%	2,200
		South Umpqua								30%	TBD
	Mid-South Coast	Tenmile	20,700	5%	N / A	16,000	---	N / A	8,000	TBD	
		Coos								30%	TBD
		Coquille								50%	TBD
Floras		5%								TBD	
Sixes		10%								TBD	
SMU Total	85,600	---	---	69,300	---	---	33,300	---			
SUMMER STEELHEAD	Mid Coast	Siletz	---	600	N / A	---	300	N / A	---	200	
	Umpqua	North Umpqua	---	4,200	N / A	---	3,200	N / A	---	1,200	
	SMU Total	---	4,800	---	---	3,500	---	---	1,400		

Winter Steelhead at Winchester Dam

(December 1 to April 30)



Year	Wild ^a	Hatchery	Total
1945-46	6,563		6,563
1946-47	11,220		11,220
1947-48	9,700		9,700
1948-49	9,225		9,225
1949-50	7,008		7,008
1950-51	4,188		4,188
1951-52	10,635		10,635
1952-53	5,094		5,094
1953-54	9,124		9,124
1954-55	4,755		4,755
1955-56	10,211		10,211
1956-57	8,923		8,923
1957-58	6,350		6,350
1958-59	6,372		6,372
1959-60	5,815	323	6,138
1960-61	4,906	286	5,192
1961-62	7,688	46	7,734
1962-63	5,639	198	5,837
1963-64	7,670	56	7,726
1964-65	8,990	482	9,472
1965-66	9,099	836	9,935
1966-67	7,659	930	8,589
1967-68	6,258	3,605	9,863
1968-69	6,865	1,257	8,122
1969-70	10,332	1,783	12,115
1970-71	8,083	2,247	10,330
1971-72	6,352	1,914	8,266
1972-73	7,415	933	8,348
1973-74	7,894	210	8,104
1974-75	5,744	365	6,109
1975-76	5,789	223	6,012
1976-77	5,264	177	5,441
1977-78	5,949	538	6,487
1978-79	7,359	452	7,811

Year	Wild	Hatchery	Total
1979-80	7,532	293	7,825
1980-81	6,580	94	6,674
1981-82	6,405		6,405
1982-83	3,853		3,853
1983-84	4,588		4,588
1984-85	8,404		8,404
1985-86	10,530		10,530
1986-87	8,153		8,153
1987-88	9,775		9,775
1988-89	7,187		7,187
1989-90	8,537		8,537
1990-91	3,928		3,928
1991-92 ^b	4,326	937	5,263
1992-93	3,876	490	4,366
1993-94	3,733	355	4,088
1994-95	4,937	782	5,719
1995-96	4,425	470	4,895
1996-97	5,176	599	5,775
1997-98	4,239	868	5,107
1998-99	5,175	1,161	6,336
1999-00	5,183	1,766	6,949
2000-01	8,216	1,320	9,536
2001-02	8,572	1,257	9,829
2002-03	8,475	800	9,275
2003-04	12,888	1,619	14,507
2004-05	6,691	856	7,547
2005-06	6,307	1,112	7,419
2006-07	8,377	1,254	9,631
2007-08	9,041	470	9,511
2008-09	7,640	191	7,831
2009-10	10,046	562	10,608
2010-11	9,189	400	9,589

^ahatchery summer steelhead that passed during the winter count period (not estimated after 1980-81)

^bcounts since 1992 are total counts from a video camera.

Ten Year Average Counts

	Wild	Hatchery	Total
1946-50	8,743		8,743
1951-60	7,147	323	7,179
1961-70	7,511	948	8,459
1971-80	6,738	735	7,473
1981-90	7,401	94	7,411
1991-00	4,500	743	5,243
2001-10	8,723	852	9,575

Average Counts

	Wild	Hatchery	Total
Since 1946	7,153	822	7,676
Last 10 Yrs.	8,723	852	9,575

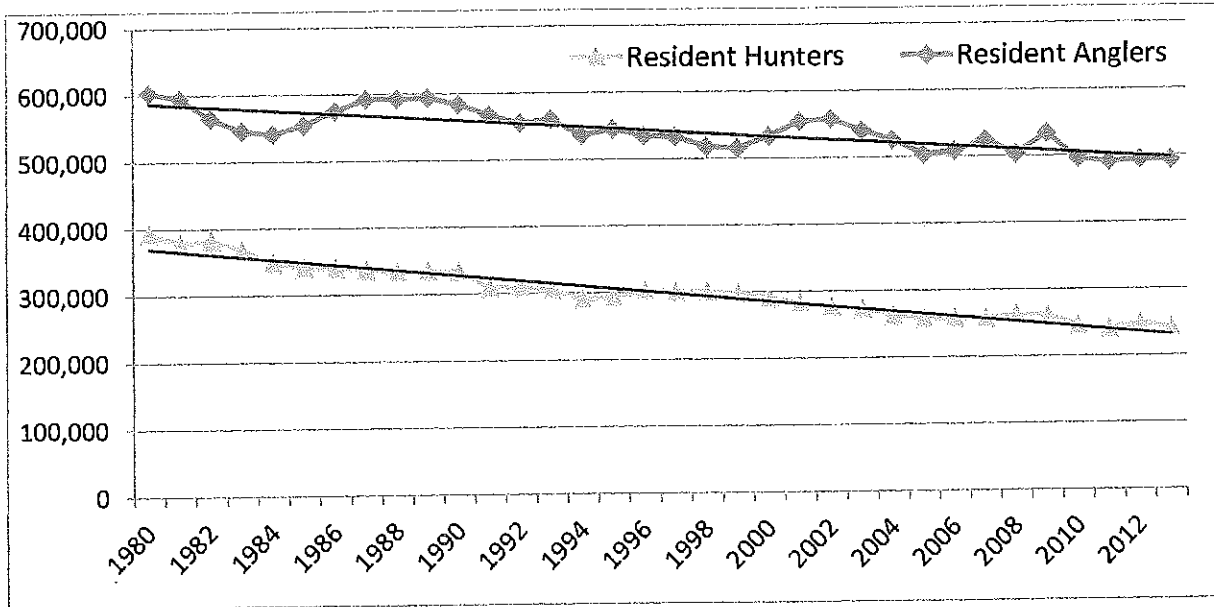
May 19, 2014

What is going on with the Oregon Department of Fish and Wildlife (ODFW) budget?

ODFW is currently developing its 2015-17 budget proposal. As we look to the future, we forecast a significant gap between projected expenses and revenues. Operating and personnel costs are projected to continue to rise due to inflation while our revenues are expected to remain relatively flat.

A major factor affecting the short and long term outlook for the department is hunting and fishing participation trends. While we've seen leveling out in recent years, hunting and fishing participation is at the lowest levels in the last 30 years.

Resident hunting and fishing license trends from 1980 to 2013.



Several other factors are putting short term and long term pressure on the department budget, including lower than projected revenue from the 2010 fee adjustments, issues with federal funding and unanticipated expenses due to legislative action, state agency fees and litigation.

We project a significant gap between expenses and revenue in the 2015-17 biennium and beyond unless action is taken to reduce costs and increase revenue. This projection is based on several assumptions, including increased costs due to inflation, no additional revenue from license sales or other sources, and fully funding Oregon State Police Fish and Wildlife Division budget request. For the 2015-17 biennium, we project a \$32-million gap between expenses and revenue.

May 27, 2014

Bobby Levy
Po Box 69
Echo, Oregon 97826

Dear Bobby,

I am commenting on the Coastal Multi-Species Conservation Plan (CMP), this is a response for public input. As an alternate stakeholder for the Midcoast stratum to the CMP and have attended all meetings but one. I greatly appreciate all the hard work ODFW staff and you have put into the CMP so far. I like the plan overall.

For consideration, I support maintaining the Siletz River deadline 1,200 feet above Ojalla Bridge at (river mile 33). I oppose moving it upriver in any manner for the life of the CMP. Here are my reasons for opposition for ODFW moving the deadline from 1,200 feet above Ojalla Bridge in all or part to Illahee Park (rm 43) in the Siletz River for the Multi species plan for Fall Chinook Salmon fishing, a distance of 10 miles. Please consider the following.

1-The Fall Salmon deadline that have been used since 2007 are as follows; in 2008 bridge near old Mill site (bag 1 per day -5 annually), in 2009 at Jack Morgan Park (bag 1 per day - 2 annually), 2010 at old Mill Site (1 per day - 10 annually), In 2011 - 2012 - 2013 deadline at or near Ojalla Bridge (2 per day - 10 per year). This has provided good fishing opportunity and anglers have become use to that deadline.

2-With the Ojalla deadline, the Siletz River Fall Chinook are harvested at 50% or higher in ocean and river combined. This is a high harvest rate that risks sustainability of the stocks as stated by Ed Bowles at CMP meetings for coastal rivers. Moving the deadline upriver would provide increased harvest and risk.

3-ODFW and the Siletz Tribe surveyors have consistently observed high spawner counts in this premier spawning habitat above Ojalla Bridge. If this area is open to anglers, they will be targeting staging and spawning salmon that already have been subjected to heavy harvest. Some may be taken for their eggs only. I believe it is unconscionable to have a deadline that makes it legal to fish on spawning grounds.

4.0- Moving the deadline upriver flies in the face of the Coastal Multispecies Conservation and Management Plan's strategy which attempts to reduce the risk from over harvest and the need for hatchery programs to supplement the wild Fall Chinook run. ODFW mission statement is to protect and enhance the fish population.

4.1-It is detrimental to the fishery to be sorting out bright fish from undesirable fish or spawners from these core spawning areas above Ojalla Bridge to the headwaters. It is playing with genetics in terms of run timing and maturation characteristics. In low water years, impacts will be particularly heavy and survival will be reduced. Based on ODFW studies (2006-2013), on average, 40.4% of main stem spawners spawn downriver from Illahee Park at RM 43. In 2008 it was 50%. On low water years, those numbers can be considerably higher. In 2011 and 2012, more Chinook spawned between Illahee and Mill Park compared to other sections of the river. This reach appears to have improving gravel conditions.

4-2-Long term harvest rate (per ODFW data) can be especially high during low run years. Chinook spawner numbers were 528 in 2007 with a in river harvest rate of 66% which when combined with ocean harvest is totally unacceptable. Retired ODFW official Bob Buckman and Tribal Biologist Stan Van Dewetering claim those

numbers were inadequate to perpetuate genetic diversity. From the CMP January 2013 public review draft, page 149, the desired abundance for the Siletz River is 8,100 for an ideal spawning population. This is rarely met. Some run components that spawn from September through December from the lower mainstem to the headwaters can't be sustained with so few spawners in the low years and will be genetically bottlenecked.

4.3-The proposed deadline change up to Ilahee Park would allow fisherman to catch staging and spawning fish: information from reputable anglers and guides suggest that only 1 out of 10 might be considered of food value. The Tribes study suggested the same ratio. It is not a good idea to be stressing out dark Salmon with catch and release, and also it is bad from a genetics perspective to be selectively removing the bright fish. Some anglers may be fishing for the eggs only. Four OSP officers have stated that some fisherman will target visible fish on the redds. All fisherman will certainly be fishing the holding water below the redds if given a chance.

5-ODFW data indicates a long term increase in Chinook harvest rate within the Siletz River from 1975. Considerable new technology and motors are more prevalent. The use of motors and high tech. sonar fish finders give the fish little chance. Catchability has increased with new gear types and harvest is greater now on in river spawners based on ODFW punch card data, in spite of a decrease in license sales through time. We need more conservation minded regulations to compensate for the increased angler effectiveness.

6- Logging and land use impacts to the watershed and its fish are heavy. These fall Chinook have to deal with compromised habitat, climate change, as well as high harvest.

7-We are just coming out of returns of historic lows and based on opinions already quoted by biologists, the likelihood it will occur in the future again is substantial. Please note that the Siletz River Basin Management Plan of 1997, policy 4 = States that, **conservation objectives should take priority over harvest objectives** in the Siletz River fish management plan.

8-Jet Boats were outlawed above Morgan Park in 1987 by the Oregon State Marine Board. Through technology and boat design, large propeller driven boats have taken their place. In the OSMB rule making decision in June 2013 to eliminate the use of large outboards above Morgan Park, OSMB would not consider the detrimental effect of high speed power boats running upriver over redds. See effects of Jet Boats on Salmon Eggs by A.J. Sutherland and D.J. Ogle in New Zealand 1975. Studies have found that in shallow water, developing eggs and alevins in the gravel can suffer high mortalities (up to 40%) as a result of pressure changes caused by boat operation, which can result in removal of gravel or mechanical shock generated under the mid line of the boat. Horton 1994, or Bush 1988 studies show propeller driven motors have a greater effect than jet pumps or as much in water depths they both can operate in. Consequently their use has compromised where the salmon fishing deadline should be in 2013. The deadline should not be above Morgan Park also.

9-The Magnuson-Stevens Act requires the Fisheries Management Council to minimize adverse effect on EFH (essential fish habitat) from fishing activities to the extent practicable. According to the interim rule to implement EFH provisions, adverse effects of fishing may include physical, chemical, or biological alterations of the substrate, and loss of or injury to benthic organisms, prey species and their habitat, and other components of the ecosystem. The marine activities considered in this section which the council can directly influence are the effects of nutrient enrichment in salmon spawning streams. This section also considers similar activities under control of the states and tribes as well as disturbance of redds or fish in shallow water environments from fishing activities. (e.g. boat operation.)

10-To avoid confusion to anglers, please regulate fish harvest with the sliding scale for bag limits being proposed by CMP instead of maybe in addition, moving the deadlines around from year to year. Other rivers have stable deadlines. On the projected high years for the Siletz, keep the bag limit at 2 and 10, not 2 and 20. A compromise may be 2 and 15. We do not want our wild run of Salmon to be compromised, or require hatchery backup.

11-The Confederated Tribe of The Siletz Indians for the last 6 years, have written to ODFW commissioners stating their concern for the continued pattern of low returns and how hard it is for ODFW to predict run size for Fall Chinook in the Siletz River. They have been asking for reduced bag limits and lower deadlines. For the CMP they want the long term deadline located at 1,200 ft above Ojalla Bridge to allow for protection of those spawning adult salmon that we depend on for our fishery long term.

12-In the past, The Siletz Watershed Council, Mid Coast Watersheds Council, The Siletz Tribe, Longview Hills Fishing club, and ODFW biologists from Newport and Corvallis have been consistent in wanting to keep the deadline at Ojalla Bridge or lower in the river to protect our returning wild run of Fall Chinook when they reach their spawning grounds.

13- Ojalla Bridge is a good long term management choice for the deadline and folks have become use to it for the last 3 years. This will make the deadline more consistent with other rivers of comparable size above the head of tidewater where salmon spawn, which is for the Siletz 8.5 miles. The Alsea is at 9 miles, Nestucca is at 8.8 miles, Nehalem is at 6 miles, Siuslaw is 7 miles. Please help us treat the Siletz equal.

14-There are 33 miles of good fishable water below Ojalla Bridge to the ocean. This is by far longer than other comparable rivers except the Wilson River where CMP proposes to move the deadline further down river. (ODFW info) This provides us with good fishing opportunity for all users and has given us many limits of Chinook.

15-The proposal to open the area between Mill Park and Illahee Park (known as the town loop) as a compromise surfaced in stakeholder group discussions and was based on information from one stakeholder that this segment had much less spawning than the segment downstream from Mill Park downstream to Ojalla Bridge. Which the stakeholders had agreed to keep closed. The stakeholder group also was under the impression that much of the segment in the town loop was open to bank fishing. They learned later that most of this area is in fact private property and closed to the public, Sargent Todd Thompson from OSP Newport agrees. Also, very few property owners fish from their bank. There is only one public access point and that is in the Jantzi Addition and a very little fishing off the Illahee and Mill park Boat Ramps. Sargent Thompson recently said that to have closed areas within open areas would be an enforcement nightmare and it would unduly complicate angling regulations. In addition, we are seeing more gravel accumulating around the town loop. Spawning numbers have increased faster in 2011 and 2012 than the other sections of river. Some of the increase should be contributed to lower deadlines the last six years that has helped spawner escapement. Therefore, I oppose opening the town loop for fall Salmon fishing or any variations being thrown out their above Ojalla Bridge.

16-Those that are highly supportive of not changing the 2013 Siletz River deadline are longtime members of the Siletz Watershed Council, Midcoast Watersheds Council, a number of guides, local ODFW and Corvallis biologist's, the Siletz Tribe biologist, and the Confederated Tribes of the Siletz Indians. We all have been consistent in wanting to keep the deadline where it has been or lower these past number of years at Ojalla Bridge. Please do not cut the line to fine to please or satisfy a vocal few and their clients.

17-Stan VandeWetering (evaluation from the genetics study by the Siletz Tribe) has shown there are four separate breeding populations of fall Chinook Salmon. Of these 4 groups we are most concerned with the lower one. With the early components of the traditional fall run, we feel that run needs to be protected from over harvest. ODFW has proposed a closure above Ojalla Bridge to Illahee Park through October 8. We request for this group an additional closure in the river above tidewater for that period of time when these fish spawn, from the head of tide to the Illahee Park. Stan and Siletz Tribe suggested closure through October 15. Chante Davis—1 author, Dr. Michael Banks—2nd author, 2014.

18-At the ODFW meeting in Tigard last June 25, ODFW Commissioners voted for the order of conservation, to keep the Fall Salmon deadline at 1,200 feet above Ojalla bridge on the Siletz River for 2013. Nothing has changed long term, the deadline needs to remain the same the next 10 years.

19-As a long time Siletz Watershed Council Member, Midcoast Watersheds Council Sport Fishing Representative, Honorary Longview Hills Fishing Club member, Northwest Steelheaders member, Midcoast alternate stakeholder to the CMP and a fisherman of the Siletz River for 54 years, I feel a deep obligation to try to help look out after the Siletz River. There needs to be a balance between sport fishing and sustainability of our wild run of Salmon. This is best accomplished with a deadline kept at 1,200 feet above Ojalla Bridge for all the reasons above for the life of the CMP.

Summary;

A. Chinook are all ready harvested at 50% or higher in the ocean and river combined and is risk to sustainability as quoted by Mr. Bowels at CMP meetings. (paragraph 2)

B. Deadline – Stan VanDewetting, October 15 for this group of limited spawners. (paragraph 17)

C- The deadline has been from Morgan Park to the Mill Site area since 2008, 2009, 2010. Keep deadline 1,200 above Ojalla Bridge where it has been for the last three years, 2011, 2012, 2013. So that it is consistent with other Coastal Rivers of comparable size. (paragraph 13)

D- Deadline 1,200 feet above Ojalla Bridge is supported by ODFW Commissioners on June 27, 2013. (paragraph 18)

NOTE

At an emergency summer regulation meeting in Newport 2 years ago, biologists and others spoke up in opposition to moving the deadline upriver above Ojalla Bridge. After the meeting, a guide who is a proponent to getting the deadline moved up river, told the Siletz Tribal Biologist that he had wondered whether allowing his clients to practice catching and releasing predominately dark salmon was a good idea. For the good of the river and its wild run of Fall Chinook, the deadline needs to remain the same.

Respectively,

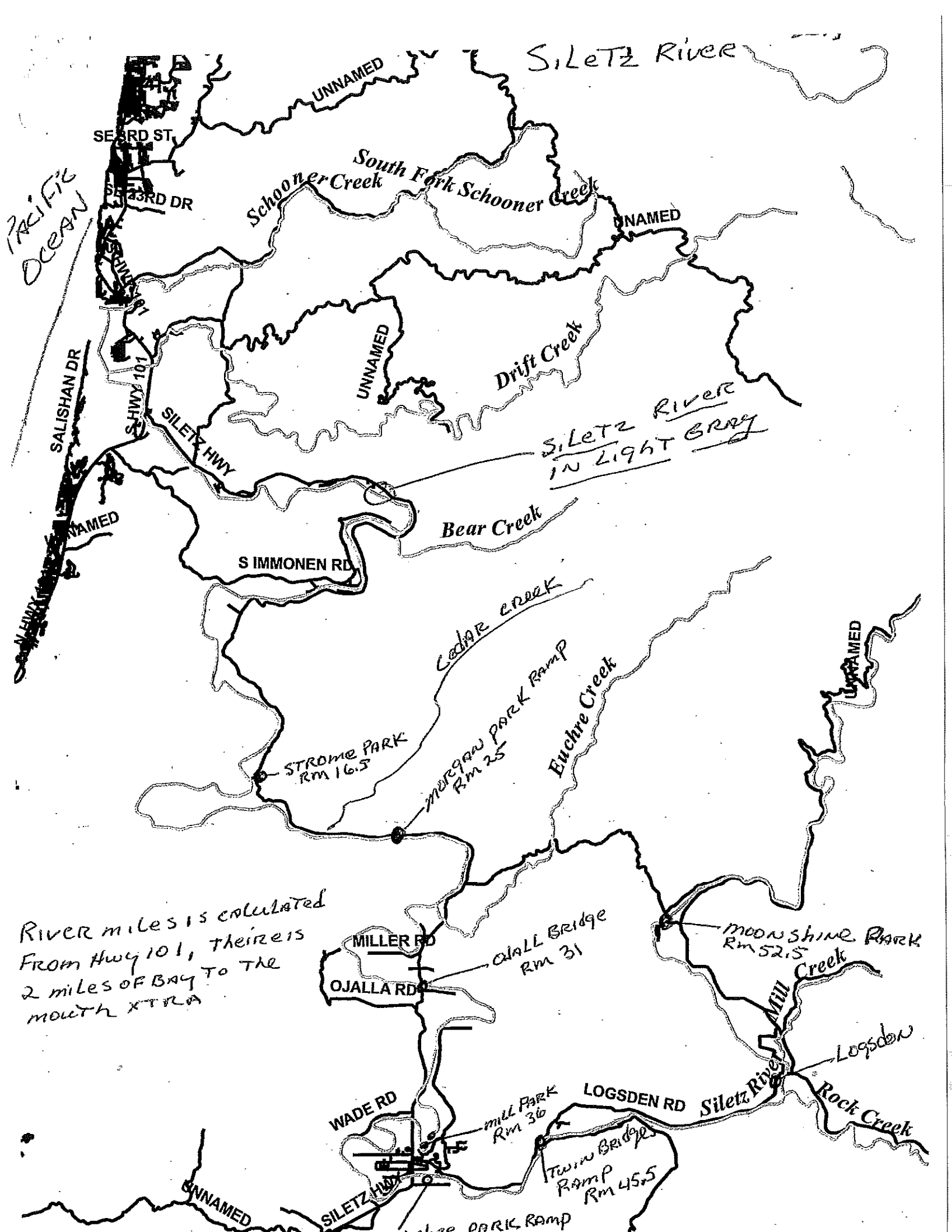
Don Larsen 541-444-2846

Siletz Chinook salmon angling regulations for the time period after August 1.

<u>Year(s)</u>	<u>Bag limit</u>	<u>Deadline</u>
Prior to 2004	2 day/ 20 annually	Mouth of Buck Creek
Starting in 2005	2 day/ 20 annually	Moonshine Park
2008	1 day/ 5 annually	Bridge near Old Mill Site
2009	1 day/ 2 annually	Morgan Park
2010	1 day/ 10 annually	Old Mill Site launch
2011	2 day/ 10 annually	Ojalla Bridge
2012	2 day/ 10 annually	~1,200 above Ojalla Br .
<u>2013</u>	<u>2 day/ 10 annually</u>	<u>~1,200 above Ojalla Br .</u>

Areas open to fall chinook harvest in 2013

	Tide water (miles)	Above tide water (miles)	Total miles (2013)	2014 Multi Species Plan Proposal (river mile)
Nehalem	14	6	20	15 (plus 4-5 bay miles)
N. Fk. Neh.	12	5.5	17.5	same as 2013
Wilson	11	29	40	22 (plus 4-5 bay miles)
Trask	13.5	13.5	27	same as 2013
Klichis	9	12	21	same as 2013
Nestucca	9	8.8	17.8	15.8 (plus 2-3 bay miles)
Salmon	5	8	13	9
Siletz Moonshine	24.5	30	54.5	
Siletz Old Mill	24.5	13.5	38	
Siletz Olalla	24.5	8.5	33	31 (plus 2 bay miles)
Siletz Illanhee	24.5	18.5	43	41 (plus 2 bay miles)
Drift (Siletz)	3	6	9	10
Yaquina	20	0	20	25 (2 miles above tide) 5 (includes 3 miles above tide)
Big Elk				
Alesea	14	9	23	same as 2013
Drift	10	5	15	same as 2013
Yachats	2	6.5	8.5	permanent regs
Sluslaw	22	7	29	same as 2013
Lake Cr	22	9.5	31.5	same as 2013
Umpqua	27.5	84	111.5	permanent regs
Coos Bay	16	0	16	permanent regs
South Coos River	10	0	10	permanent regs
Millcooma River	1	0	1	permanent regs
Cocquille	37	0	37	permanent regs
N. Fk. Cocquille	9.5	0	9.5	permanent regs
S. Fk. Cocquille	3	2	5	permanent regs
M. Fk. Cocquille	0	9	9	permanent regs
Sixes	2.5	7.5	10	permanent regs
Elk	2.5	12.5	15	permanent regs
Chelco	4	10	10	permanent regs



River miles is calculated from Hwy 101, there is 2 miles of BAY TO THE MOUTH XTRA

Tom Oliver

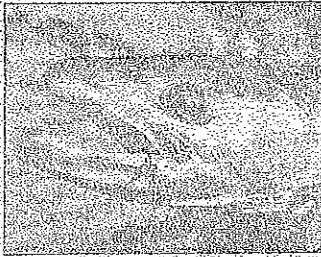
ALWAYS ON OREGONLIVE.COM

Scientists angle for a bit more bite in hatchery fish

By Jeff Barnard
Associated Press

Oregonian 4.29.14

In a lifetime of fishing for winter steelhead on Oregon's Alsea River, Stan Steele has seen it get harder and harder to hook into hatchery-bred fish. Instead, he has found he is more likely to hook the wild variety, whose numbers have declined.



JAMIE LUSCH/ASSOCIATED PRESS

Can steelhead be bred to bite? Researchers in Oregon plan to try, as hatchery steelhead — which greatly outnumber wild fish — have proved less willing to chomp on what anglers are offering them.

breed the bite back into hatchery steelhead.

Results won't be known for at least four years, but one thing is certain: It makes no sense for the state to spend \$25 million a year to produce fish for fishermen to catch

See Fish, A4

A growing body of evidence is showing that Steele's experience is not some fish story, but the result of natural selection. Wild fish, which generally must be released unharmed, retain the aggression that will land them on the end of a hook easier than hatchery fish.

Prodded by fishermen, the Oregon Hatchery Research Center has agreed to see if it can

Fish

Continued from A1

if those fish won't bite.

"It's an exciting idea for us," said David Noakes, a fisheries professor at Oregon State University and senior scientist at the research center. "Depending on what the answer is, we might be changing a lot of things about raising hatchery fish and stocking hatchery fish."

Hatcheries have been taking the place of Mother Nature to produce salmon and steelhead in the West for more than 120 years. They are supposed to make up for overfishing and habitat lost to dams, logging, mining, agriculture and urban development.

To distinguish them from wild fish, hatchery fish have been marked since the 1990s by clipping a fleshy knob at the base of the tail called the adipose fin. Hatchery fish make up the vast majority of salmon and steelhead returning to rivers, but are not always the majority of those caught.

As scientific evidence has grown that hatchery fish are less likely to survive in the wild, and even contribute to declines of wild fish, many hatcheries have been mixing in wild fish to improve the gene pool.

Ryan Couture, the research center's director, said this would be their first attempt to breed a better biter.

So few steelhead returned to the Alsea this year that volunteer anglers did not turn in the 30 live wild fish needed to start the experiment, he said. They'll try again next year. It takes a year to raise the fish to be old enough to release, then two more years to return as adults.

It's in the genes

There is evidence that when it comes to biting, a fish is not just a fish.

A 30-year study, published in 2009, in Transactions of the American Fisheries Society on the effects of fishing on black bass in an Illinois lake showed that removing the aggressive fish that bite while defending

their nests during spawning season produces a population less likely to bite.

In short, the tendency to bite can be inherited, said David Philipp, the study's lead author and principal scientist at the University of Illinois' Illinois Natural History Survey.

"As you fish a population, you tend to catch the most aggressive ones. Oftentimes they are removed from the population. As a result, the population becomes less vulnerable to angling because it is less and less aggressive," Philipp said.

Just what makes a steelhead bite is something anglers can talk about for hours.

Steelhead — rainbow trout that go to the ocean to grow up — do not feed when they return to their native river to spawn. But they will still bite a clump of roe, a ball of yarn, a worm, a fly or a lure wiggling in their faces. Color seems to make a difference. So does size and movement.

Surveys of Deschutes River anglers since 1977 consistently show that wild fish account for the bulk of fish caught, even as their numbers have dwindled. In 2013, nearly six wild fish were caught for every hatchery fish, while hatchery fish outnumbered wild fish nearly 3-to-1.

The wild bite

On the Alsea, the first year of a three-year creel survey found that hatchery fish bred from wild parents were caught by fishermen three times more often than those bred from the hatchery's longstanding stock.

The biter experiment goes a step further, breeding fish exclusively from wild parents caught by fishermen, and comparing them with nonbiters that return to the hatchery.

Steele, a retired state police fish and game officer and fishing guide, has been the biggest contributor of wild fish to the experiment. As overall steelhead returns to the Alsea have declined, the proportion of wild to hatchery fish he catches has reached 3-to-1.

He hopes breeding better biters will ultimately mean fewer hatchery fish overall to compete with wild fish.

Umpqua River Winter Steelhead Biological Assessment (ODFW, 2003 – Page 21)

Table 4 compares the population estimates for the various study designs conducted on the Umpqua Basin. The estimates for the population on run year 2002-03 are statistically similar, all within the 95% confidence interval. Our sample size for the telemetry and Peterson Mark/Recapture studies were limited due to budget constraints. These studies need to be conducted over several years and with larger samples. The district has the most confidence in the AUC spawning survey methodology. Whatever the study method, the counts at Winchester Dam are real time and extremely accurate. Therefore, the Telemetry and Peterson Mark/Recapture are reflective of Winchester Dam counts and thus adds further validity to these study population estimates.