

Rationale for Amending a Portion of the CMP Now

Thank you for the opportunity to provide you some thoughts on a topic of great importance to me and many of my friends and fellow anglers.

My name is Jeff Dose. I reside in Roseburg along the North Umpqua River. I'm a retired Fisheries Biologist who spent 31 of my 35 year-long career working in the Umpqua Basin. I am a Board member of the Steamboaters, a Science Advisor to the North Umpqua Foundation, a member of the Douglas County Global Warming Coalition, and a member of the North Umpqua River Coalition.

The topic I'd like to address is what I clearly believe is a needed, and appropriate, change to the Coastal Multi-species Management Plan (CMP). Specifically, since adoption of the CMP, there has been some substantially changed conditions to the environment within the North Umpqua basin from the Archie Creek fire and accelerated climate change. There has also been a changed condition with status of the wild summer steelhead population, with a substantial declining trend. I believe plan amendments are entirely appropriate as described in the CMP Introduction on page 5. Namely that the plan is a dynamic document that will be modified over time in response to data and experience. Changes from the original assumptions regarding wild NU summer steelhead are both biological and environmental.

Habitat quality is already problematic in some parts of the watershed and will undoubtedly be further reduced from decreased water quality, sedimentation, simplification of stream channels from landslides, among other factors. The biological conditions that have changed is a decline from the observed abundance of 3,200 from which the CMP is based, while counts of wild summers at Winchester Dam have actually been under 2,000 for 4 of the last 6 years. This is a movement away from the desired abundance and towards the critical abundance of 1,200 identified in the CMP. The current status in the CMP is that they are Sensitive – Vulnerable and proactive management of existing threats is warranted. It was true then and new information supports the need for even greater actions. I would point out that the CMP calls for a review and if information appears to show that progress is not being made towards desired status goals, or declining towards critical abundance levels, the ODFW will consider if additional, or alternative, actions need to be implemented. I strongly believe this is the case.

Please note that OAR 635-500-0020 (1) (d) for steelhead management goals there is direction to protect wild populations of steelhead from detrimental interactions with hatchery fish. The CMP noted that hatchery fish have the potential to cause either genetic or ecological (i.e, competition or predation) impacts on any population with which they spatially and temporally overlap. They certainly do overlap in the case of NU summer steelhead at both juvenile and adult life stages. The pHOS goal is to not exceed 10%. This is either unmet or not accurately measured. Many of the returning hatchery summers counted at Winchester Dam are not accounted for in harvest or the Rock Creek trap. Some indication of where they go, and likely spawn, is counts at Soda Springs Dam, which is some 40 miles upstream from Rock Creek. In

some years the number of hatchery summers has equaled and occasionally greatly exceeded wild summers.

The environmental and biological conditions affecting the long-term persistence and abundance of wild NU summer steelhead is at great risk. The social and economic benefits from a robust run of wild NU summer steelhead is great but is threatened. One action that you, the Commission, can take to reverse this trajectory is to amend the CMP to eliminate the NU summer steelhead hatchery program. It won't solve all the threats but will go a long way towards that goal. One final thought, the genetic diversity inherent in a wild steelhead population will provide for greatly improved resiliency that will be needed to cope with changing environmental factors.

Thank you.