

Public Comments

**Public Comments Received as of
August 2-17, 2021**

KINGSLEY Lisa M * ODFW

From: Sen Golden <Sen.JeffGolden@oregonlegislature.gov>
Sent: Monday, August 2, 2021 8:02 AM
To: maryodfw@gmail.com; MINER Jason * GOV; odfw.commission@state.or.us
Subject: ODFW Rogue South-Coast Multi-Species Conservation and Management Planning RSP Comments
Attachments: Golden Letter ODFW Steelhead Comments.docx

Please find the attached letter from Senator Golden.

Best,
Andrew Baker
Office of Senator Jeff Golden

JEFF GOLDEN
STATE SENATOR
DISTRICT 3



OREGON STATE SENATE

August 2, 2021

ODFW Rogue South-Coast Multi-Species Conservation and Management Planning Staff
Attention: RSP Comments
Re: Support for Wild Steelhead Fishing Alternative A for Catch and Release

Dear ODFW Rogue-South Coast Planning Staff,

I am joining constituents and over 25,000 stakeholders from across the region in supporting Alternative "A" catch and release regulations for wild winter steelhead in the southwest zone. I ask that these regulations stay in place until population and harvest data ensures our wild steelhead can sustain additional pressure from harvest fisheries.

ODFW's proposal to continue to allow wild steelhead harvest without accurate and timely adult population data is concerning. Angling efforts on the Rogue and South Coast have increased since the last time creel survey information was gathered. To date, ODFW does not know the percentage of the total population being harvested. In the absence of this harvest information, ODFW does not have a full understanding of the current population status of wild winter steelhead. The current monitoring plan proposed in the draft conveys a lack of commitment to collecting and integrating this vital information into fisheries management.

Southwest Oregon's wild steelhead fishery is a cornerstone of recreation and tourism – a measure of quality of life for locals, and an attraction for anglers from across the globe, whose sport creates jobs and supports regional business. The push for catch and release angling regulations for wild steelhead and the robust collection of adult steelhead data comes from constituents and stakeholders who represent a variety of interests.

ODFW staff and the Commission have acknowledged the need to take proactive and precautionary measures in the face of uncertainty in the recently adopted Ocean and Climate Change Policy. ODFW has a key role in ensuring that steelhead populations thrive into the future. The Rogue South Coast Plan and its management of the wild winter steelhead fishery is the right place to put these guiding principles into action and to buffer native fish species in the face of increasing stress from climate change and population uncertainty.

JEFF GOLDEN
STATE SENATOR
DISTRICT 3



I encourage department staff to support precautionary approaches that will lead to the long-term health of our fish, fisheries, and community and support Alternative "A" catch and release for wild winter steelhead. Thank you for your consideration.

Best,

A handwritten signature in blue ink, appearing to read "Jeff Golden".

Jeff Golden
Senate District 3

cc: ODFW Commission Chair Mary Wahl: maryodfw@gmail.com ODFW Commission:
odfw.commission@state.or.us
Office of Governor Brown: Jason.MINER@oregon.gov

KINGSLEY Lisa M * ODFW

From: Kirk Blaine <kirk@nativefishsociety.org>
Sent: Friday, August 20, 2021 6:13 PM
To: ODFW.Commission@state.or.us
Cc: Mark Sherwood
Subject: Comments in support of Alternative A: Catch and Release on RSP Public Draft
Attachments: NFS RSP Comment.pdf; Gen RSP Comments .pdf

Chair Wahl and Commissioners,

Native Fish Society is writing to share the number of letters submitted during the recent RSP public comment period ending August 1, 2021. Due to the critical lack of wild steelhead population data, monitoring effort, harvest rate data, among other concerns, we support **Alternative A: Catch and Release for wild steelhead** until managers have a better grasp on the status of these populations.

For your reference, we have attached our organizational supporter's public comments in regards to the public draft of the RSP to this email. We have provided a count of the public comments individually submitted by supporters advocating for Catch and Release: Alternative A for wild steelhead over the past three years. Below is a demographic breakdown of the geographical locations of these supporters. Please keep in mind that these supporters and advocates for wild steelhead live throughout the Pacific Northwest, the country, and the world, and they travel to southwestern Oregon to fish, hire guides, stay at hotels, and buy meals at local restaurants. As you can see, healthy steelhead runs help drive the region's economy.

Catch and Release Angling Support					
	Method	Total	Oregon Residents	Curry, Jackson, Josephine Counties	California
2018	Signed Petition	664	436	388	111
2019	Change.org Petition	24,682	1,384	324	771
2021	NFS ODFW Comments	1,337	610	133	183
2021	Gen ODFW Comments	141	22	20	15
	Total	26,824	2,450	860	1,087

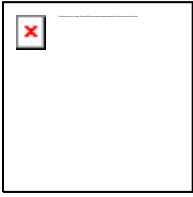
The response to past petitions and the most recent ODFW public comment period documents the many anglers and advocates calling for responsible management and wise conservation of this incredible resource. Our individual organizational letter shows detailed support, and our reasoning, for our advocacy on behalf of Alternative A and other concerns relating to the current draft of the RSP.

Please let me know if you have any questions or would like more detail on our support, or reasoning, for this important regulation change and topic.

Best regard,

Kirk Blaine
Southern Oregon Regional Coordinator, Native Fish Society
kirk@nativefishsociety.org

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Kirk Blaine

Southern Oregon Regional Coordinator | Native Fish Society

813 7th Street, Suite 200A, Oregon City, OR 97045

Cell: 307.299.7834 | Office: 503.344.4218

nativefishsociety.org • [Facebook](#) • [Instagram](#)

Non-profit Tax ID: 93-1187474

Dear Oregon Department of Fish and Wildlife,

Thank you for the opportunity to provide public comment on the draft Rogue South Coast Multi-Species Conservation Management Plan (RSP). A plan centered around conservation and long term health of identified species is critical to the future of these fish, the rivers, and the communities throughout southern Oregon. The following comments are provided to highlight concerns with the draft plan and the changes that are necessary to ensure the future health of the region's fish species.

Angling Alternatives:

ODFW provided three alternatives for wild winter steelhead angling regulations in the draft RSP. Without current adult harvest monitoring or adequate adult escapement for multiple generations, ODFW does not know the total impact of harvest on wild winter steelhead as a result of directed harvest and catch and release angling. I request the department change regulations to "Catch and Release" for wild winter steelhead on the Rogue and south coast until a five year review is completed and adequate monitoring data including population estimates is available to inform harvest management. I ask the Department to recommend this alternative to the commission when they present the final RSP to Commissioners in October.

Management Triggers and Actions:

Conservation status for all species has been indicated as an appendix of the plan. Conservation status for Winter Steelhead on the south coast will be identified by juvenile occupancy. The Department did not provide examples of a management agency who successfully utilizes juveniles as a health indicator to evaluate overall population health or as a mechanism to take action to reverse species in decline. We ask that the department utilize adult spawner escapement data from newly instated south coast spawning surveys as the basis for

assessing management triggers and actions after five years of plan implementation.

The conservation triggers in draft RSP don't respond quickly enough to fish population decline. The draft of RSP states action will be taken when a two-year average is below conservation status, which is not adequate. When identified populations dip below conservation status in a single year, action needs to take place. The plan must commit the Department to take action when populations reach an identified trigger similar to the Rogue Fall Chinook SMU Conservation Management plan, i.g. angling regulation changes, hatchery program changes, and habitat action changes.

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

- ~Adult population estimates and escapement in each watershed
- ~Juvenile measurements correlated to adult escapement in each watershed
- ~Effects of harvest (mandatory reporting of all harvest and catch and release)
- ~Effects of hatcheries (pHOS)

Hatchery Actions:

The current RSP provides a suite of actions that increase hatchery expansion throughout the Rogue and south coast. I request that the department does not include any hatchery expansion in the RSP including the following changes:

- ~Elimination of the proposed Euchre Creek and Winchuck River Mixed Emphasis Areas
- ~Elimination of offsite hatchery releases in the Rogue River
- ~Elimination of increased ESA listed Coho releases in the Rogue River
- ~A decrease in smolt outputs to reach mitigation goals in the Rogue basin

Thank you for the opportunity to provide public comment. Critical data and monitoring will be necessary to inform management of wild winter steelhead harvest on the Rogue and South Coast. Until population estimates and monitoring is in place, I ask the Department to continue to provide the opportunity for catch and release angling for wild winter steelhead on the Rogue and south coast watersheds and harvest in the interim on hatchery origin stocks. These changes will provide the conservation management necessary to help restore wild abundance.

Sincerely,
John Doe
jdoe@gmail.com XXXXX

Dear ODFW Staff,

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

In light of current climate conditions and a lack of monitoring data, the proposed angling regulations and harvest of wild winter steelhead greatly concern me. The Department does not have adequate adult spawner information and the impact of harvest on the wild winter steelhead in Rogue and south coast watersheds could prove disastrous for long term sustainability.

Because of this, I request the Department to proceed with Alternative A, "CnR" or Catch and Release regulations until a five year review of the RSP has been completed and adequate adult winter steelhead population estimates are available to inform harvest management.

To ensure harvest opportunity continues, I ask the department to increase the daily bag limit for hatchery fish for the identified management area.

I look forward to this management alternative moving forward and the department recommending this to the commission during their presentation in October of 2021.

Sincerely,

John Doe

jdoe@gmail.com XXXXX

From: [Greg Fitz](#)
To: ODFW.Commission@state.or.us
Subject: RSP Draft Public Comments Supporting Alternative A: Catch and Release for Wild Steelhead
Date: Monday, August 23, 2021 9:43:32 AM
Attachments: [Wild Steelhead Coalition RSP Public Comment ODFW 08012021.pdf](#)

Chair Wahl and Commissioners:

On behalf of our Board of Directors and members, it is my pleasure to pass along a copy of the Wild Steelhead Coalition's letter submitted during the recent public comment period for the draft Rogue-South Coast Multi-Species Conservation and Management Plan (RSP).

Because of our deep concerns regarding the lack of comprehensive population data, population trends, harvest and catch-and-release impacts, and the modeling used to estimate wild steelhead numbers in Southern Oregon's beautiful rivers, we are calling for the RSP to proceed with Alternative A: Catch and Release for Wild Steelhead.

To be clear: We see this position as a question of precautionary conservation principle and hope it spurs a renewed effort from ODFW to use the next years to pause harvest of wild steelhead in Southern Oregon until populations, and the harvest impact they can sustainably bear, are better understood. As dedicated anglers, we see this as the only responsible option for fishery management in the 21st century. We simply cannot operate wild fish harvest opportunities on population assumptions. It is too risky, especially when we know that ocean conditions have been causing immense damage to steelhead populations from British Columbia down to California during the last decade.

If you or any other Commissioner would be interested in discussing this issue further, we would be happy to schedule time to elaborate on our advocacy. Our letter was submitted by board member Bruce Skinner, a resident of Bend, Oregon, and includes the perspectives of Guy Fleischer, the WSC's Science Advisor, a retired NOAA fisheries scientist with over 30 years of fisheries modeling and monitoring experience. We would appreciate any opportunity to chat further!

Additionally, through our web portal, 167 anglers and conservationists from throughout the region also sent individual letters to ODFW during the public comment period to register their support for Alternative A: Catch and Release for Wild Steelhead in the draft of the RSP.

Thank you very much for your time and consideration of this important matter.

Please let me know if you have any questions,

Greg Fitz

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GREG FITZ

COMMUNICATIONS MANAGER



July 30, 2021

Oregon Department of Fish and Wildlife

(Via Email: <ODFW.RSP.Comments@odfw.oregon.gov>)

Subject: Rogue-South Coast Multi-Species Conservation and Management Plan (RSP) Public Comment

Fishery Managers (ODFW):

Thank you for the opportunity to submit public comments regarding the current DRAFT of the Rogue-South Coast Multi-Species Conservation and Management Plan.

My name is Bruce Skinner. I live in Bend and serve on the Wild Steelhead Coalition's Board of Directors. Speaking on behalf of our members and Board of Directors, many of whom are based in Oregon or travel to fish Oregon rivers, we recommend the RSP proceed with **"Alternative A: Catch and Release Angling for Wild Steelhead."**

Additionally, we would recommend **NOT adding a new acclimation site for hatchery fish at Jumpoff Joe Creek.**

Faced with almost complete lack of data collection around returning adult wild steelhead, spawning success and use of available habitat, spawning interactions between hatchery and wild fish, and grim anecdotal reports of low fish numbers from local anglers during recent seasons, we believe the only responsible management decision is to stop killing wild steelhead on Oregon's South Coast Rivers until comprehensive adult population numbers can be established, harvest rates are accurately tracked, incidental mortalities from catch-and-release are included in measures of recreational angler impact, and run size trends are documented over a span of multiple years.

We have heard some anglers and managers explain the controversy around continued harvest of wild steelhead in Oregon's South Coast watersheds as a "social" issue, but we believe this is a misrepresentation of the facts and that pausing wild steelhead harvest is a decision firmly rooted in responsible fishery management and the limits of currently available data.

Our recommendation for "Alternative A" is based on a precautionary, common sense approach: We fear current harvest practice could be having an adverse impact on wild steelhead populations in Oregon's South Coast watersheds. Given the lack of comprehensive population estimates, and the well-documented declines in wild steelhead across the entire West Coast and British Columbia and



widespread anecdotal reports of poor fishing success on South Coast rivers in recent years, Oregon is taking too big of a risk by allowing harvest of wild steelhead in this area until we know how many adult wild steelhead are returning each year and if their populations are *both* stable and healthy enough to withstand some level of harvest.

Additionally, the population viability analysis (PVA), a conservation modeling tool from the 1990's not widely used for the vast majority of current fish stock assessments, is nonetheless dependent on a reliable understanding of the spawner-recruit relation. The stock-recruitment analysis provided in the RSP for Upper Rogue winter steelhead (1998-2017) is not instructive. At face value, there is a noticeable lack of contrast in stock (i.e, flat) and importantly, displays rather significant recruitment variance (i.e, noise) (ref. p. 131). A common problem, as acknowledged in the RSP, but one that has major implications to the evaluation of the status of the stock for proper management.

Assessing the degree to which fish populations are governed by density-dependent versus density-independent factors is typically complicated by incomplete or biased information, particularly in the case of steelhead because of their complex life history. If not addressed in a rigorous manner, errors (and omissions) in the data affect estimates of population demographics, which can obfuscate an understanding of the status of the population and the desired response of the population to continued harvest.

This is obviously the case here and the authors of the RSP admit that “The spawner-recruit data are not fully explained by the logistic hockey stick recruitment function, even though parameter uncertainty is acknowledged” (ref. p. 134) and uses this failure to apply PVA models “developed ... for the existing data.” This is not a compelling argument that would support the assertion that the PVA is “a sound modeling approach.”

We would argue this admittedly unreliable approach (ref. p. 133) should be a reason for ODFW to err to the side of caution for the Rouge-South Coast wild steelhead as even with concerns about the quality of data used in the analysis, there is a lack of any discernible compensatory recruitment – the likely result of factors not strictly related to stock size (e.g., trends in smolt survival, inconsistent or biased sampling, hatchery competition, aggregation over sub-populations) and probably a host of others that need to be properly analyzed. Aside from the current lack of any reliable information on the status and trends in wild steelhead run size, this putative recruitment pattern can lead to a general interpretation that recruitment is robust including the lower range of spawner abundance - which if incorrect can lead to overexploitation.

Given the above, other agencies managing wild steelhead have turned towards integrated population models (IPMs) as a means to convey the combined uncertainty in all of the data sources, which is particularly important in a conservation context. IPMs are routinely used in marine fisheries and other conservation applications by providing a hierarchical framework that allows for the joint



modeling of different data types and in cases of incomplete data. A good example for steelhead is a recent paper by Scheurell et al. 2021:

Scheuerell, MD, Ruff, CP, Anderson, JH, Beamer, EM. An integrated population model for estimating the relative effects of natural and anthropogenic factors on a threatened population of steelhead trout. *J Appl Ecol.* 2021; 58: 114– 124. <https://doi.org/10.1111/1365-2664.13789>

Thank you for your time and consideration. Speaking for myself as well as a group of passionate anglers, we would not hesitate to support the harvest of wild steelhead if we knew populations could sustain the impact, but under the current circumstances in the Rogue-South Coast SMU, such actions are unconscionable. Oregon fishery managers must immediately shift their management principles from one that demands harvest opportunities at all costs to one guided by credible science.

Thank you for the opportunity to provide public comment,

Bruce Skinner

Bend, Oregon
Board Member, Wild Steelhead Coalition