



Date: June 9, 2021

To: Chair Wahl, Vice Chair Wolley, Commissioners Hatfield-Hyde, Khalil, Labhart, Spelbrink, Zarnowitz and ODFW Staff

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

RE: Rogue/South Coast Multi-Species Conservation and Management Plan: Harvest and Hatchery Alternatives

Greetings Chair Wahl, Vice Chair Wolley and Commissioners,

We are writing to you today to advocate for wild salmon and steelhead in Southern Oregon. Trout Unlimited, Native Fish Society and Wild Salmon Center have been participating, as stakeholders, in the development of the Rogue/South Coast Multi-Species Conservation and Management Plan (RSP), facilitated by the Oregon Department of Fish and Wildlife (ODFW). Throughout this planning process our organizations have called for a plan that balances sustainable harvest opportunities within a framework of conservation. Our organizations share a vision of thriving wild salmon and steelhead populations that are self-sustaining despite the combined anthropogenic threats of climate change and habitat loss/alteration. Our vision includes the opportunity, for all who are interested, to harvest wild fish. However, we cannot support a plan that allows wild harvest at the expense of future salmonid populations. One of our collective guiding principles throughout this process has been to directly tie wild harvest opportunities to adequate population monitoring. Southern Oregon is one of the last places in the Pacific Northwest where wild steelhead can be harvested. As such, we believe that the era of harvesting wild salmonids from populations that do not have robust population-level juvenile, adult and harvest monitoring, is over.

We have vehemently called for increasing conservation measures in areas of the RSP plan that have large data gaps and/or uncertainties. Unfortunately, the reality is that data gaps and uncertainty regarding the current population dynamics of the RSP species (i.e., basin specific juvenile abundance, adult abundance, life history diversity, etc.), the effects of current wild harvest (i.e., basin specific harvest rates and catch and release mortality) and effects of hatchery releases (i.e., degree of predation, competition and introgression between wild and hatchery fish), prevail throughout this plan. Due to these data gaps and high uncertainty and the fact that climate change was not substantively discussed during the stakeholder process, several key elements in the plan did not reach consensus. We strongly believe that had ODFW's climate change analysis (presented during the Habitat Work Group after the stakeholder process ended) been presented to stakeholders, as mandated in the Climate and Ocean Change Policy (635-900-0013), the entire plan would be more conservation oriented. We believe that in light of the dire future that the ODFW climate analysis presented, stakeholders would have rallied to protect and conserve these runs, and more elements would have reached consensus. For non-consensus elements in the RSP, ODFW has agreed to allow a set of alternatives to be presented to the ODFW Commission to make the ultimate decision. Because details regarding the process of alternatives (i.e., how many alternatives) and how they will be presented to the Commission has not been clearly articulated, we felt like a letter would be the most direct way to provide our organizations current

collective thoughts. We expect and hope other stakeholders to present alternatives of their own, so you can get a complete picture of the multitude of stakeholder viewpoints.

We have listed two alternatives for the interim harvest regulations regarding wild steelhead (proposal 2 and 3 in the table below) and one collective set of alternatives for the hatchery management section, that we feel should be included for your deliberation. Our organizations believe that the data gaps and ecological uncertainties in this plan are substantial enough that harvest proposal 3 is fully warranted. Since 2018, local community members and Native Fish Society have advocated for catch and release of all wild steelhead in the RSP management area. In 2019, close to 2,000 Oregonians signed a petition to adopt catch and release regulations for wild winter steelhead in these fisheries. Native Fish Society and numerous anglers and stakeholders remain committed to having this as a management option until adequate monitoring indicates that harvest rates will not have a lasting, negative impact on wild steelhead. During the stakeholder process, our organizations suggested proposal 2 which we see as a significant compromise. This was an attempt to balance fishing opportunity with conservation by focusing harvest on the most abundant populations while protecting the small, and consequently most vulnerable, populations. Additionally, our hatchery proposal includes an increase in the daily hatchery bag limit to offset reduced opportunity in the smaller basins during the interim and to decrease the ecological interactions between wild and hatchery adults on the spawning grounds.

In summary, we believe that the data gaps and uncertainties regarding population dynamics and hatchery effects are large enough that current wild steelhead harvest and hatchery releases may be having a lasting, negative impact on south coast salmonid populations. Therefore, the interim regulations should be precautionary and conservative, until adequate data has been collected, at which point they could be re-evaluated. This allows ODFW five years to fill data gaps and ameliorate the uncertainties. At the five year review, if monitoring data support this action, our organizations would be first in line to advocate for relaxed conservative measures that allow for sustainable wild harvest. This allows for a truly adaptive management plan, that is guided by scientifically defensible data and monitoring.

Thank you for considering our alternatives. Please reach out if you have any questions or would like any of the scientific literature that has guided and supports our positions.



Dean Finnerty, NW Director ACP, Trout Unlimited



Mark Sherwood, Executive Director, Native Fish Society



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

Wild Winter Steelhead Angling Framework

ODFW is seeking input on **harvest rate limits** and **interim harvest regulations for the first five years after plan adoption** that would be presented as management action alternatives in the RSP Public Review Draft. Interim regulations will be reviewed after five years and adjusted as needed to ensure harvest rates remain below limits established in the plan.

The table below shows current wild steelhead harvest regulations and the compromise alternative presented in the RSP First Draft. **Please use the shaded columns on the right to indicate your proposal for harvest rate limits and interim harvest regulations.**

Stratum	Basin/ Population	Current Regulations (2019-2021)		ODFW Draft Alternative #1			WSC and TU Alternative Proposal #2			NFS Alternative Proposal #3	
		Bag Limit* (daily/annual)	Season	Harvest Rate Limit	Interim Regulations		Harvest Rate Limit	Interim Regulations		Interim Regulations	
					Bag Limit* (daily/annual)	Season		Bag Limit (daily/annual)	Season	Bag Limit (daily/annual)	Season
Coastal	Elk	1/3	May 22– Dec 31 & Jan 1–Mar 31	<10%	1/3	Dec 1– Mar 31	<10% *	1/3	Dec 1–Mar 31	CnR	---
	Euchre	1/3		<10%	CnR		---	CnR	---	CnR	---
	Hunter	1/3		<10%	CnR		---	CnR	---	CnR	---
	Pistol	1/3		<10%	1/3		---	CnR	---	CnR	---
	Chetco	1/3	Hunter Cr: Jan 1–Mar 31	<15%	1/5	Hunter Cr: Jan 1– Mar 31	<10% *	1/3	Dec 1–Mar 31	CnR	---
	Winchuck	1/3		<10%	1/3		---	CnR	---	CnR	---
	NADOTs	CnR		---	CnR		---	CnR	---	CnR	---
	NF Smith	CnR		---	CnR		---	CnR	---	CnR	---
Rogue	Lower Rogue	1/3	Jan 1–Apr 30	<15%	1/5	Dec 1– Apr 30	<10% *	1/3	Dec 1–Apr 30	CnR	---
	Illinois	1/3	May 22– Dec 31 & Jan 1–Mar 31		1/5	Dec 1– Mar 31	<10% *	1/3	Dec 1–Mar 31	CnR	---
	Middle Rogue (excludes Applegate)	1/3	Feb 1–Apr 30		1/5	Feb 1– Apr 30	<10% *	1/3	Feb 1–Apr 30	CnR	---
	Upper Rogue	1/3	Feb 1–Apr 30		1/5	Feb 1– Apr 30	<10% *	1/3	Feb 1–Apr 30	CnR	---

*** Wild harvest opportunities will be directly tied to monitoring. Any basin open to wild harvest opportunities MUST have a robust juvenile, adult and harvest monitoring program in order to assess the effect of harvest on wild populations. If budget constraints limit juvenile, adult or harvest monitoring, wild harvest opportunities will be limited commensurately.**

Hatchery Management Action Alternatives

RSP Stakeholder Teams did not reach consensus on the actions in the following table. The table shows the alternative presented in the RSP First Draft and an Alternative Proposal based on your comments to ODFW. **Please confirm that the details of the Alternative Proposal in the shaded column match your expectations.**

Action	First Draft Alternative	NFS, WSC and TU Alternative Proposal
III.A.1	Designate WFEAs/MEAs as shown in Figure 6 of the RSP First Draft.	Designate WFEAs/MEAs as shown in Figure 6 of the RSP First Draft, but remove MEAs in Euchre Cr and Winchuck R.
III.B.1	10% pHOS limit for coho salmon populations in the Rogue Basin.	10% pHOS in MEAs and 5% pHOS in WFEAs (management scale). If ODFW cannot manage WFEAs at the management scale, then 5% pHOS limit for all basins that receive hatchery inputs.
III.D.4	Establish a new winter steelhead hatchery smolt acclimation in a tributary of Jump Off Joe Cr; shift 15,000 smolts from Applegate release to acclimation and release at Jump Off Joe Cr.	Do not establish a new acclimation site or shift 15,000 smolts to Jump Off Joe Cr.
III.F.1	Increase Rogue hatchery coho salmon release target from 75,000 to 100,000 smolts.	Do not increase Rogue hatchery coho salmon release target.
???	Daily bag limit on hatchery fish remains at 2 per day.	Daily bag limit on hatchery fish increased to 3 per day.
???	Summer steelhead hatchery releases currently exceed annual mitigation targets.	Summer steelhead hatchery releases from Cole Rivers will be reduced to a level that does not exceed annual mitigation targets.