



November 11, 2024

Washington Department of Fish and Wildlife
600 Capitol Way N.
Olympia, WA 98501-1091

Submitted online at: wdfw.wa.gov/fishing/management/steelhead/coastal
Also sent via email to: commission@dfw.wa.gov

RE: Proposed rule changes for 2024/2025 winter steelhead sport fishery on Washington Coast

To WDFW:

Please accept the comments below on behalf of more than 4,500 Trout Unlimited (TU) members in Washington State, 300,000 TU supporters nationwide and over 30,000 Wild Steelheaders United supporters. We appreciate the opportunity to provide comments on the upcoming 2024/2025 winter steelhead fishery on Washington's coast.

TU is North America's largest nonprofit organization dedicated to the protection, conservation, and restoration of cold-water fish and their watersheds. Our strength is derived from our grassroots members and volunteers working together with our staff toward the common goal of ensuring resilient fish populations for future generations. TU is dedicated to using the best available science to guide our efforts, and we have the benefit of applying the expertise of our staff fisheries scientists to support policy and science efforts requiring careful analysis.

As an organization, TU has been involved with steelhead conservation efforts on the Washington coast for over a decade, including various habitat restoration projects on the Olympic Peninsula and throughout the Chehalis River basin. Additionally, we've participated in multiple coastal-specific WDFW advisory groups that were tasked with informing steelhead harvest and hatchery management issues.

After discussions with your regional staff about last year's run sizes, forecasts, and the proposals that were shared out to the public in October, we have the following observations and recommendations for consideration as you develop regulations for this season and more holistically as the agency works to improve and modernize coastal steelhead management.

Most importantly, WDFW should be developing a framework for the implementation of recreational fishing regulations that is consistent with rebuilding depleted stocks, while allowing for a diverse suite of fishing opportunities. These regulations should seek to balance conservation concerns, while also maintaining open fisheries that spread angler pressure across time and space and prioritize the harvest

of hatchery fish to minimize the harm to wild populations consistent with the Statewide Steelhead Management Plan (SSMP).

We're pleased to see that in the upcoming legislative session, the Fish Program is prioritizing the comprehensive actions laid out in the agency's 2022 Coastal Steelhead Proviso Implementation Plan and believe the recommendations within this package, including the development of Regional Management Plans and the implementation of a Management Strategy Evaluation for coastal rivers will help to inform and direct season-setting moving forward.

For now, please consider the following comments as you work closer toward finalizing the upcoming sportfishing regulations:

Willapa Bay

We are supportive of the reduction in season length on the Naselle River in April to protect kelts. But given that steelhead populations are above the escapement goal in most Willapa Bay rivers, we recommend WDFW restore the fisheries that occurred into March on the Bear, Nemah, and Palix Rivers to spread out fishing pressure and reduce angler crowding on the two watersheds that would be open through March. Finally, based on the size of the river, impacts to the angler experience, and to provide greater equality for bank-bound anglers or those that cannot afford a guide, we recommend WDFW should implement no fishing from a floating device rule for the season on the Naselle River. Additionally, this last regulation should be considered a permanent rule change moving into the future.

Chehalis River Basin/Grays Harbor/Humtulpis River/South Coast Independents

While we appreciate the effort to provide fisheries to reduce hatchery impacts in the Chehalis system, we believe the current approach is severely flawed. Except for the Wishkah River, the hatchery releases in the Chehalis River tributaries are from late-timed integrated programs, with the majority of fish returning in mid-February and March. The fisheries being proposed are from December through February, and their use as a tool to control hatchery abundance in the Chehalis and tributaries is inconsistent with the return timing of the hatchery fish and should not move forward as proposed.

With the forecasted abundance above the escapement goal this year, WDFW should be designing fisheries that target the peak of the hatchery run in late February and March to reduce impacts from the programs, which have had exceptionally high pHOS and low level of pNOB in recent years (Marston and Huff 2022, WDFW Escapement Reports). With closed fisheries over the past three seasons in the Chehalis basin, these winter steelhead hatchery programs continue to present an increased significant risk to wild populations in the basin because of the lack of harvest opportunity.

In addition, the agency should strive to spread out pressure throughout the watershed by maximizing opportunity while also utilizing harvest to reduce the impacts of hatchery fish on the spawning grounds. This includes the need to open other parts of the watershed where hatchery releases are taking place such as the Newaukum River (~35,000 smolts) and upper Chehalis watershed above Rainbow Falls (~10,000 smolts at Eight Creek) where no seasons are currently proposed. If impacts of a March season and additional areas in the watershed are expected to exceed the allowable encounters of wild fish, WDFW should explore additional regulations such as closing the river during January before most hatchery fish begin to arrive, a mandatory retention regulation on hatchery fish to aid in reducing impacts (as implemented currently on the Methow River), increased limits on hatchery fish, and no fishing out of a floating device.

We support the agency's decision to open the Humptulips River as a measure to reduce the impacts of hatchery fish on wild stocks. However, since the run forecast is expected to be below the escapement goal, we question whether opening the river during February is consistent with the impacts to the natural origin population. Additionally, this fishery should be opened under selective gear rules to minimize any harvest impacts to early returning wild steelhead. Similar to the Chehalis system. WDFW should consider mandatory hatchery retention and/ or higher limits on hatchery fish to reduce impacts on wild populations.

In our discussions with staff, we are supportive of the management attention being considered for the South Coast independent rivers of the Moclips and Copalis Rivers. Additionally, we request the opportunities provided by south Grays Harbor tributaries are also considered in this process.

We also request that the budget used for what will be the third year of a test fishery on the Hoh River be re-allocated and applied toward additional creeling in the Chehalis basin. To date, there has been a complete lack of information provided about how the data from this test fishery will be used, including the inability of staff to share clear goals or even a study plan. With two years of data already in hand and no clear vision for how the test fishery will inform future management decisions, the funds would be better utilized supporting the monitoring needed to allow additional fishing opportunities on the coast.

Olympic Peninsula/Strait Independents

First and foremost, WDFW *must develop and come to an agreement* with the Quinault Indian Nation for management objectives within the Quinault and Queets River basins. Co-managed fisheries lacking general agreement on escapement goals and unmarked hatchery fish being planted in these rivers only perpetuates the long-term decline seen within these two basins.

Given these conservation concerns, we support a selective gear fishery allowing boats for transportation only through the month of March in the Upper Quinault River to reduce impacts while allowing for a longer season. Similarly, we support a selective gear fishery allowing boats for transportation only through the month of March in the Queets and Clearwater Rivers. However, given the discrepancy of management objectives with co-managers, these systems should be provided with a high-level of monitoring and creeling to account for catch and adjust based on in-season impacts.

If the boat study that is being conducted on the Hoh River remains comprehensive and follows a clear study plan, then we'd support continuing the ongoing research from last year and the emergency regulations that were adopted to support this study.

In the Quillayute River system, our recommendations would be to continue a fishery through April, implementing selective gear rules, with no fishing from a floating device on the Bogachiel and Calawah Rivers above Hwy 101. We'd recommend similar rules for the entire Dickey River but closing it at the end of March given the mean spawn date for the system of April 5.

The Sol Duc River, the state's first designated Wild Steelhead Gene Bank, is a crown jewel of the North Coast and given its conservation status as the only WSGB in the region, a precautionary approach with a higher level of care must be given to this important tributary within the Quillayute River basin. The agency must get past this notion that in boom times, they must provide the most liberal angling opportunities to fish stocks down to the escapement goal. We understand that integrating management options to address limiting factors like hatcheries and harvest within the WSGB framework will not happen this season, we believe that should not preclude the agency from implementing a conservative set of emergency regulations for the Sol Duc River. This should include no fishing from a floating device in the entire watershed, and a selective gear fishery through April.

Finally, WDFW must pursue, in earnest, signed Steelhead Harvest Management Plans for the Strait of Juan de Fuca Independent rivers, including the Hoko and Sekiu. It's been years since a signed agreement has been used and over the past decade this region that spans from the Makah Indian Reservation to the Elwha River has been neglected both in terms of the relationship with co-managers and the overall management of these rivers. Moving forward, it is essential that WDFW wraps these systems into the management approaches being applied for the rest of the Washington Coast.

The decision to list Olympic Peninsula steelhead will most likely be warranted by NOAA in the coming months. Unfortunately, these proposals provided by WDFW at the October town hall meeting don't reflect that urgency or conservation concern.

Overall, we question the agency's proposal to consider bait in December across the coast. With the early component of the winter steelhead runs severely depleted and the run timing now truncated, primarily due to legacy fisheries impacts, there needs to be a higher level of consideration for using all levers to build back this portion of the run. It represents an important component of steelhead diversity, often spawning earlier in the rain driven tributaries. Instead of liberalizing fishing regulations to remove hatchery fish from the watersheds, WDFW should focus its efforts on ensuring that hatchery programs are sized appropriately to meet the standards set in the SSMP and consider operational changes to increase trapping efficiency at the hatcheries or options to increase access to the fishery. *If* bait is used, WDFW's 10% C&R mortality rate should be adjusted during the period in which bait is used to account for the higher mortality on wild fish resulting from the use of bait.

Again, we appreciate the opportunity to provide comments on the sportfishing regulations for the upcoming coastal winter steelhead fishery and look forward to our continued work with regional staff to recover and protect steelhead and the opportunities to pursue them.

Sincerely,

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REFERENCES

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