August 1, 2007

Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, OR 97303
RE: Angling Rules Proposals

Dear ODFW,
The Wild Steelhead Coalition would like to submit comments on the proposed rule changes to steelhead harvest policy in the Umpqua River. We support a ban on the wild steelhead kill fishery on the Main stem and North Umpqua.

We strongly oppose the proposal to increase the allowable harvest on wild steelhead. Our concerns are based on our review of your research report entitled *Biological Assessment of the Impacts to Wild Winter Steelhead on the Umpqua River from the Recreational Fishery*. First, we must applaud ODFW's considerable efforts to develop rigorous estimates of steelhead population abundance and productivity in the Umpqua River system. We understand the data and modeling described in this document to be the basis for your proposal to maintain a wild kill fishery. We accept that the information provided is based on sound research methods and science, but we have some lingering questions about how it was interpreted to support your management proposal because the presentation was quite confusing.

We feel that ODFW has not adequately considered the potential effects of wild kill at harvest rates approaching 30% on the long-term viability of this critical population. Our concerns are twofold. First, we are not convinced that the factor of safety you have defined on the basis of intrinsic productivity is sufficiently robust in the face of a changing natural environment in the Pacific Northwest. Second, we do not feel that your have considered adequately the potential effects of such a high harvest rate on wild fish diversity, a critical component of population health.

With regard to our first point of contention, modeling of population productivity based on habitat capacity is inherently a backwards looking exercise. It relies on existing and in many cases older data on habitat capacity and smolt production rates to forecast the future. We submit that this implicit presumption is no longer viable in the face of what is likely to be increasingly rapid environmental change in the Pacific Northwest. We may not be able to count on a high level of intrinsic productivity in the future as a changing climate exerts its influence on the hydrologic regime and stream temperatures of our rivers. A 30% harvest rate is perilously close to the factor

of safety bounds that you have defined around this population without taking future uncertainty into effect.

With regard to our second point, we again agree that ODFW has developed an excellent base of information for estimating the abundance and productivity of Umpqua winter steelhead. However, we must point out that these are only two of the four elements that constitute a robust population. The spatial structure and, perhaps most importantly, the diversity of the population must be considered as well. These four elements are key criteria in recovery planning under the Endangered Species Act, and they will ultimately define performance goals that your agency will be required to pursue.

Your own fisheries scientists have acknowledged the importance of diversity to population health. On page 6 of the document cited above the authors state:

"(Genetic diversity is partitioned within and between stocks and populations. It provides the essential resource upon which natural selection acts in the face of changing environmental conditions, thereby allowing future adaptation to each stock's local environment."

ODFW has provided no information regarding how a 20% to 30% harvest rate on Umpqua River wild steelhead would affect the diversity of this stock. The biological assessment suggests that harvest pressure may be distorting population diversity. Your fisheries scientists have acknowledged that harvest practices affecting a particular segment of a stock in time or space may lead to genetic changes (pg. 7), and note that the high percentage of repeat spawners in the Smith River stock relative to the other stocks in the basin may be attributable to the reduced angling pressure that this stock receives (pg. 15). This is intuitively logical. Repeat spawners are typically the larger trophy fish that anglers find desirable. It is no leap to state that these trophy fish are disproportionately impacted by wild kill fisheries, and that this effect would be extended to other components of the population.

Repeat spawning is not the only aspect of population diversity that needs consideration. Your productivity focused modeling approach does not appear to provide any accommodation for disproportionate effects on stock components with early and late run timing. It is well known that high harvest rates on early run wild fish mixed with hatchery returns have effectively eliminated this component of population diversity from many wild steelhead populations in Washington State.

We also note that wild South Fork Umpqua fish will be taken in the main stem at a rate that can't be defined based on current information. This run has been declining, and since they receive no protection from harvest until they reach the South Fork we will not know the incidental impact of main stem harvest fisheries. This presents the potential for disproportionate impacts on a segment of the run representing unique spatial structure, and perhaps adaptation to specialized environmental conditions. Again, we must argue that as we look forward to a changing environment, every effort must be made to ensure that these critical components of population diversity are fully and adequately considered in our management decisions.

In summary, we feel that ODFW has not adequately considered the effects of a wild kill fishery on the population diversity of wild Umpqua steelhead. Your data and modeling have been organized and presented to support a maximum sustained yield approach to managing this population. Experience throughout the range of west coast wild steelhead shows that managing for MSY escapement goals has proven to be unsustainable for far too many wild steelhead stocks, and instead we support more conservative harvest management schemes that err on the side of

spawning escapements that far exceed MSY escapement goals. In implementing this precautionary approach, we must also argue for the protection of key elements of population diversity that will allow our steelhead to adapt to environmental change. ODFW needs to consider this argument not only from the standpoint of responsible management, but also in recognition of requirements imposed by the Endangered Species Act.

The harvest rule for the main stem and North Fork Umpqua was passed in a time of very good runs, yet now the runs have dropped and the impact of harvest fisheries will likely pose greater risks to the affected populations. We find this to pose unacceptable and unnecessary risks to one of the last completely wild runs of steelhead left in the Northwest. We recommend the complete ban on any wild steelhead kill fishery on the Umpqua system.

Thank you for your consideration.

Sincerely,
Wild Steelhead Coalition

Rich Simms
President
www.wildsteelheadcoalition.com