



January 8, 2017

To: James Dixon, NOAA Marine Fisheries Service

Re: Wild Steelhead Coalition Comments on Skagit River Steelhead Fishery Resource Management Plan / PEPD

As a non-profit organization founded in 2000 by passionate anglers, advocates and scientists in response to fisheries closures and declining wild steelhead runs in watersheds such as the Skagit, the Wild Steelhead Coalition is excited about the prospect of reopening this iconic watershed for sustainable fishing opportunities. The Skagit and its world-renown wild steelhead have a storied past, and we believe that with proper management this fishery can have a rich future.

For the last seventeen years, the Wild Steelhead Coalition has been deeply involved with maintaining the health of the Skagit Watershed and its wild steelhead. From helping recover critical habitat with projects like the Barnaby Slough restoration to serving on the Puget Sound Steelhead Advisory Group, the recovery of the Skagit's wild steelhead has been a primary focus of our organization.

We appreciate the work that has gone into the Skagit River Steelhead Fishery Resource Management Plan and are grateful to the numerous organizations, scientists, and anglers that have dedicated their time to the creation of this plan and advancing this issue thus far. It is our hope that we will soon see a sustainable, conservation-oriented late-winter and spring wild steelhead fishery in the Skagit Watershed – a fishery that balances angling opportunity and the continued recovery of this important run of wild steelhead.

The Wild Steelhead Coalition is generally supportive of the designation of Skagit-origin wild steelhead as an independently managed component of the Puget Sound Distinct Population Segment (DPS). However, if management of this watershed is to be differentiated from the Puget Sound DPS to include harvest, striking a balance between fishing opportunity for both recreational anglers and tribal co-managers and the continued recovery of wild steelhead in the Skagit must be a vital requirement.

While we are supportive of the goals of the RMP/PEPD, we have some serious concerns that the plan does not go far enough to ensure sustainable fisheries and adequate adaptive management. We also have not yet received the necessary assurances from WDFW and other co-managers that they will undertake requirements of the RMP/PEPD sufficiently. We cannot jeopardize the years of progress we have made and the recovery of wild steelhead by reopening this fishery without the proper safeguards in place.

We are particularly concerned about WDFW's ability to conduct thorough, timely monitoring of the health of wild returns each season, the rate of take or other impacts on wild steelhead, as well as instituting and enforcing of regulations that ensure the fisheries are consistent with the RMP/PEPD and do not inhibit



continued recovery. With all due respect, these co-managers have a poor record with such management, and our concern is rooted in a long-history of failing to meet wild steelhead stewardship obligations.

Skagit River steelhead comprise about 38 percent of the total return of natural-origin winter steelhead to Puget Sound. After reaching a low point of abundance in 2009, the number of spawners in the Skagit River has increased by 350% and averaged 8,800 from 2013-2015. This number exceeds the average escapement of 6,993 in the 25 years prior to consideration for listing (1980-2004). However, the return of wild steelhead fell to 7,916 in 2016, and initial data indicates that 2017 was even lower.

These lower returns highlight the important fact that the Skagit wild steelhead run continues to fluctuate and is not simply experiencing continued growth. Moreover, these diminishing returns underscore the importance of exercising extreme caution with the reopening of this fishery as well as the strong need for recovery efforts to continue despite the recent welcome signs of progress.

The assessments presented in the Skagit River Steelhead Fishery Resource Management Plan/PEPD indicate that a low level of fishery mortality is consistent with the survival and recovery of the Puget Sound DPS, including the wild steelhead returns to the Skagit. This is a welcome conclusion, and we do not disagree that it is possible to impose some level of fishing mortality on the Skagit population during recovery provided that it is appropriately crafted, implemented, monitored, and regulated.

We also appreciate the adaptive nature of fisheries and harvest management as laid out by the plan, including initial fishery management and monitoring for a period of five years. However, we believe that as this plan is finalized and implemented, the following issues must be addressed:

- RMP/PEPD must be refined to better protect early returning wild steelhead. This can potentially be done through implementation, but is critical for harvest sustainability and continued recovery. Proposed co-manager net fisheries in the vicinity of important early wild steelhead spawning tributaries such as Nookachamps Creek are particularly concerning. Closures to fishing prior to February 1st should be considered for recreation and tribal fishers to protect early returning wild steelhead, particularly lower in the watershed in the vicinity of important early return wild steelhead spawning tributaries.
- Angler interest and effectiveness has increased substantially since the Skagit wild steelhead fishery was closed in 2010. Additionally, there has been notable growth of the region's angling population and the percentage of anglers who fish out of boats and other watercraft. With the high likelihood of greater than expected angler pressure and the increased ability of these anglers to catch wild steelhead, there must be stronger assurances from co-managers that regulations, enforcement, monitoring, and adaptive management obligations will be met.



- WDFW must create tight regulations to avoid angler impacts and social conditions (and the biological impacts they bring) that currently plague the Olympic Peninsula wild steelhead fisheries. These regulations should go above and beyond selective gear regulations to include no guiding and boats for transportation only on the Skagit tributaries, including the Sauk and Suiattle.
- To aid in the responsible management of this fishery and to remove uncertainty as well as the potential for illegal take, co-managers must work to ensure consistent fishing seasons under the RMP/PEPD. While adaptive management and early fisheries closures are important components of the plan and should be utilized when necessary, regulations and management frameworks should be in place to strive to make such actions a last resort.
- Given the fluctuations in the Skagit returns as well as WDFW's inability to conduct timely and precise monitoring of the health and size of wild returns each season, it is essential that co-managers use the best available science to increase escapement buffers as part of a continued commitment to wild steelhead recovery. Relying on Maximum Sustainable Yield models has led to decades of wild steelhead decline in the Skagit and other watersheds across Washington. Therefore, it is imperative that co-managers adopt more dynamic management strategies that have sufficient buffers and sound biological goals.
- While the number of returning wild steelhead on the Skagit currently exceeds the average escapement of the 25 years prior to consideration for listing, co-managers should not treat the Skagit's wild steelhead as recovered. It is critical that if this plan is approved, the increased regulations and management assurances from the co-managers be paired with an ongoing commitment to wild steelhead recovery in the Skagit Watershed. The objective should be to increase opportunities for both recreation and tribal fishers while continuing to increase the number of wild steelhead returning to the Skagit Watershed each year.

On behalf of the Wild Steelhead Coalition's thousands of members, thank you for your consideration of the comments and priorities outlined above. We look forward to working with NOAA and the co-managers to bring back the Skagit Watershed's world-class angling as well as the iconic fish that make this famed fishery possible.

Sincerely,

A handwritten signature in black ink that reads "RICH SIMMS". The signature is written in a cursive, slightly slanted style.

Rich Simms
Founder, Board Member
Wild Steelhead Coalition