



97155 MORGAN CREEK LANE
COOS BAY, OREGON 97420

South Coast Angler's S.T.E.P. Association
P.O. Box 1252
Coos Bay, Oregon 97420

Oregon Dept. of Fish and Wildlife
C/o Roy Elicker
3406 Cherry Ave. NE
Salem, Oregon 97303

Dear Mr. Roy Elicker:

The South Coast Anglers' STEP Association has reviewed the Multi-Species Comprehensive Management Plan (CMP) presented by ODFW for our consideration. The plan proposes severe random reduction of hatchery fish releases in many of our local streams. We recognize the importance of natural spawning anadromous fish, termed wild fish, in the document. We also recognize the importance of hatchery fish and the impacts to our community if the planned changes take place.

Historically, our groups have donated thousands of hours from thousands of people to the proliferation of wild fish. As an example, numerous volunteers have been involved in habitat restoration since the 1980's, and have improved several hundred miles of streams for wild fish. These actions did not change with hatchery management. Guided by the Hatchery Management Plan, our practices have demonstrated a balance between hatchery and wild fish production already. It was our members who spent fifteen years negating the genetic effects of the Alsea Steelhead transplants to our area many years ago with the use of brood stock. Unlike some of your young staff members, we know the history of the fish in our area. We consistently have struck a balance between hatchery and wild stock production and protection. We are in the forefront on this issue and been for over thirty years. It is time our efforts are recognized.

STEP representatives have participated in CMP meetings, and meetings with you and your staff down the chain of command to the local biologists. We have also held community meetings, met with legislators and other fisheries groups. In addition, members of our group with professional scientific backgrounds, have reviewed countless documents and research papers that relate to the hatchery versus wild fish issue.

In 2003, the Native Fish Policy (NFP) set the goals of your department for the future. It stated that emphasis would be placed on preserving wild fish while maintaining the social and economic importance to the fishing community. In 2005, a review of the NFP passed only rivers and streams that were designated wild fish only. Those streams that had a hatchery influence failed the review. Specifically, those streams were the Elk, Coquille, and Coos. These were the rivers designated for the most severe cuts to hatchery production. In the report, no consideration was given to the social and economic impacts as listed in the intent of the NFP, despite the fact that these are among the most popular fishing destinations in our area.

Although your agency states that these cuts to our hatchery programs are limited, it is clear that these rivers will never pass muster until all the hatchery fish are gone.

In our area, we already have several streams designated as wild fish only. These regulations have been in effect for over twenty years. In those streams, the wild fish populations have failed to rebound to a point that they would maximize the available habitat or sustain an active fishery. On some rivers, for example, a limited take for native steelhead, one fish per day, five per year, has been in effect. We are concerned that this manner of fish management is not sustainable. This management diminishes the resource that has a reproductive rate of around 1% and benefits only a few river guides that have a rotating clientele. The number of fish, the use of bait, stream access, and effect on the local economy are factors that need review for each stream in our area in which hatchery reductions are proposed. Currently, the streams in our area that are managed for wild fish only are not hard to find. During the peak of the fishing season, there are relatively few fishermen compared to other streams. (#1).

Conversely, those streams and areas with hatchery fish are the focus of our sport and are heavily fished. Any changes to these streams will have economic and social consequences. Two popular streams for winter steelhead are the East Fork of the Coquille and the South Fork of the Coos River. Both streams are proposed to have hatchery steelhead eliminated. This will increase the fishing pressure on the Millicoma Rivers and the South Fork of the Coquille. This is a social consequence that will present many difficulties on those heavily fished streams.

We recognize that hatcheries have used numerous methods for reproduction over the last one hundred years which may have been detrimental to the health of wild fish populations. As with any science, practices evolve. In our area, we use native brood stock and follow the most advanced procedures available under the supervision of local biologists from your department. We see the issue of wild fish having a unique genetic fingerprint in our area as problematic. Early logging practices destroyed habitat and spawning gravel in the major rivers. Commercial gill netting in the rivers literally destroyed the anadromous fish populations to the point that no fish were left to harvest. A subsequent one hundred years of hatchery influence to recover those fish has left us with a gene pool influenced by fish from other basins foreign to ours. At this time our fish are a mixed genetic population. No one doubts that in the last one hundred years, hatchery fish have spawned with others of their species that were of the same generation of hatchery production. Your department's current definition of a native fish is one that lived out its entire life in a natural environment. It does not address the fact that these may be second generation removed from a hatchery environment. Our use of brood stock for hatchery production equates to a hatchery gene pool that is no different from the wild gene pool.

To continue the anti-hatchery ideology, some of your scientists have looked beyond the genetics issue and cite ecological concerns of having hatchery fish, after several years at sea, on the spawning grounds. Some of this research is as primitive as placing mirrors in front of smolts and judging their behavior compared to wild smolts in an artificial environment. Opinions are expanded to suggest differences in adult fish (hatchery/wild) when they return from the sea. We see the unwritten variables here are considerable as any lay person can surmise. We find some of these conclusions from some of the studies would be humorous if the impact was not so serious. It appears with ODFW, that theoretical ideology in research produces words like *could, may, or might*. And, *could, may, or might* then become policy. Good science requires

that authors list all possibilities that cannot be excluded in the discussion portion of a research paper. These other possibilities are clearly omitted from papers put forward as justification for limiting hatchery fish by ODFW. Ray Hilborn, an often quoted fisheries scientist from the University of Washington, summed it up adequately: "An advocate knows the answer and looks for evidence to support it. A scientist asks nature how much support there is for a competing hypothesis." (#2)

The members of the South Coast Anglers STEP Association request that ODFW study the anadromous fish populations in our area along with the hatchery practices. (#3) After the review, science based decisions can be made regarding the impact of hatchery on wild fish in our rivers and streams. We currently reject the CMP as it stands as being arbitrary. Furthermore, the justifications for the reductions in hatchery fish is based on theoretical ideology that may have no application to our current hatchery practices, or based on streams in our area. (#4). We need fact based scientific decisions made for our area, in the absence of advocacy. (#5).

The Elk River is a good example. Despite the emphasis that there are no crises, the CMP proposes to reduce the Elk River Chinook releases by 75,000. Hatchery and wild fish spawning in a mid-river area seems to be the concern. Has a study of the upper waters of the Elk, their pristine conditions, and the number of wild fish spawning in this area been completed and included with the studies downstream? Reese Bender and Dr. Paul Reimers were the two most responsible for the development of the Elk River Hatchery. Reese has testified to various groups that the major upstream spawning areas for wild Chinook in the Elk River have very little influence from hatchery fish. The hatchery fish, for the most part, do not stray that far upstream. Reese has also suggested research concerning adding something (chemical) to the outflow from the fishway at the hatchery to get more of the returning fish to enter the hatchery. His recommendations would satisfy the goal to protect wild fish, and to continue an excellent hatchery fishery on the Elk River.

The proposed elimination of Chinook at Hall Creek around Coquille needs to be addressed. There is no need to eliminate the salmon; instead, the salmon can be released in the lower Coquille River. This would eliminate the problem of inconsistent returns to Hall Creek, and yet enhance an already good fishery in the lower Coquille. This idea has support from various ODFW officials that we have talked to.

Fishing plays a large role in the economy of our small rural communities and this impact has been ignored despite the intent of the NFP. Salmon and steelhead harvests on the Coos and Coquille River systems were estimated at over 15,000 in 2011. Travel Oregon estimates that each of these fish brings in over \$300 to our local economy. That is over \$4.6 million per year that is well distributed throughout every corner of our community. This money is in hotels, restaurants, tackle shops, gas stations, boat repair, shops, boat supplies, grocery stores, RV parks, etc. The number of boats and fishermen from early August through March continue to increase because of the great fisheries. Reduction in angling opportunities will have a direct and indirect effect on our economy. As has already been stated in footnote one, we already have at least six streams set aside for wild fish only. This has not been fully recognized, and any cuts will have definite negative effects.

Again, we reject the current CMP as it is written, but we are willing to work with you on developing a CMP that is fitted for our area based on the best available data collected in our area. As has been stated by your department on several occasions, there are no crises right now. The bottom line for us is that we have already done all the we could have done according to the latest science and guidelines from ODFW. We have been way ahead of the game since the early 1980's.

Footnote #1: The following six streams have only native or wild steelhead runs: Elk River, Sixes River, Floras Creek, Middle Fork of the Coquille, Middle Creek, and the Smith River (the Smith River is under our watershed). Since there are no crises and there are at least six streams with only native steelhead, there is no need to eliminate the hatchery steelhead on the South Fork of the Coos River and the East Fork of the Coquille.

Have you studied what impact the proposal will have on the East Fork of the Coquille's community? Dora, Sitkum, the farms and homesteads, and the people's lives will be affected by the proposal to eliminate hatchery steelhead. The people who live in this area live close to the land and many of their homesteads go back many generations. Whatever happens to that river affects the lives of its citizens. How can this recommendation be put into effect without a detailed consideration of what that plan will do to the community? Also, the native fish will be in danger. If a limited catch is allowed on that river, the native fish population will be reduced. If no fishing is allowed in order to protect the native fish, the community will be denied a right that has existed since the original settlers populated that area.

The proposed elimination of hatchery steelhead on the South Fork of the Coos River is one of the best examples of how a blanket proposal disregards an exceptional hatchery program with protection of wild steelhead as a key component. The hatchery steelhead are acclimated at Big Creek. Most of the steelhead return to where they were acclimated. The stray rates for the hatchery steelhead are within the standards set by ODFW. The native steelhead spawn many miles upstream in an area that has approximately 100 miles of good spawning grounds. The Upper Coos River, Falls Creek (made accessible by the work of many volunteers in building a fish ladder), Tioga Creek, and the Williams River provide pristine habitat for the native steelhead, and are seventeen miles upstream from our acclimation site. This river provides an excellent example of a balance to protect the native fish along with enhancing the fishing opportunities in the lower river.

Footnote #2: Morgan Creek Hatchery is an excellent example of how science and the practices that follow have evolved over the years. Morgan Creek is considered the template for hatcheries in the Northwest. Of course, we need to give credit to Douglas Timber Operators for the land and providing much of the materials to build the facility. ODFW personnel and a very large number of volunteers provided the staffing to complete the hatchery. Of utmost importance, every effort was made to be guided by the latest science and ODFW standards in the development of the hatchery and how it operates throughout the year. Some of the leading biologists and fish and wildlife administrators in the Northwest have praised Morgan Creek, and they have noted how advanced the hatchery is compared to other facilities in the Northwest.

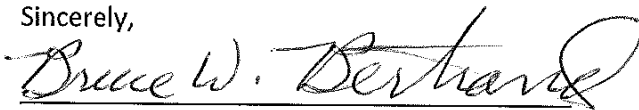
Footnote #3: At the Reedsport stakeholder meeting, a South Coast Angler representative told an ODFW administrator that they should not rely on the Hood River Steelhead study, but

should study local streams along the Oregon Coast. That person replied that there wasn't enough money to conduct those studies. Of course, this reply is not accurate. It is a matter of priorities. ODFW has funded multi-million dollar projects because they were rated top priority. Money is available, especially from various foundations and corporations. We, on the South Coast, would be willing to work on securing funds for scientific research. We would endorse enthusiastically the research on why we, in Coos County, are doing so well with our fisheries. Again, it is a myth that money is not available. It is a matter of priorities and a knowledge of how to tap into monetary resources.

Footnote #4: The major study being done on Winchester Creek with Coho is a great example of what could be applied to steelhead studies on the North Fork of the Coquille and Middle Creek. Those are paired streams or watersheds and it is possible to adapt the methods of the Winchester Creek study to the North Fork of the Coquille and Middle Creek and provide up-to-date science.

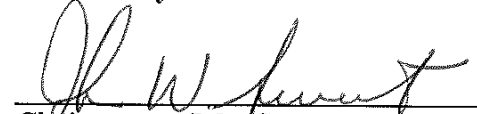
Footnote #5: On June 11, in the Capitol Building in Salem, before two committees of the Oregon congress, ODFW based much of their presentation on hatchery vs. wild steelhead on the Hood River study. Many ODFW scientists believe the study is valid; many other people do not for various reasons. Thus, as has been true for decades, there is much division over these issues. The bottom line is that neither side can claim ultimate victory. We are only scratching the surface in studying the natural world. The South Coast would be a great laboratory to deepen our knowledge.

Sincerely,

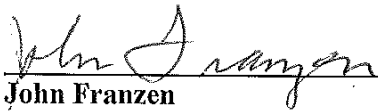


Bruce W. Bertrand
President
South Coast Angler's S.T.E.P. Association

Coos County Board of Commissioners



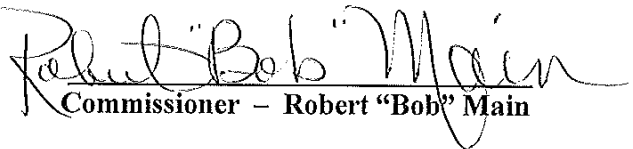
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Date July 30, 2013