

From: Glen and Sharon Mendel [mailto:gs_mendel@q.com]

Sent: Wednesday, November 26, 2014 1:15 PM

To: Ashbrook, Charmane E (DFW)

Cc: Whalen, John T (DFW); Bumgarner, Joseph D (DFW); Trump, Jeremy C (DFW)

Subject: my comments on mandatory retention of hatchery steelhead

Hi,

Here are my comments on the proposed mandatory retention of hatchery steelhead. Please verify that you received this and that it opens and is readable. Thank you.

Although I understand and appreciate the intent of the proposed mandatory hatchery steelhead retention regulation, its proposed implementation in the Snake and Grande Ronde rivers is problematic and will likely cause unnecessary adverse effects on these steelhead fisheries. My concerns and the expected problems associated with the proposed regulation in these two rivers are listed below:

1. The Snake River, like the Columbia River, is a migratory corridor for hatchery and wild steelhead to reach upstream hatcheries or natural spawning areas, and to provide fisheries in SE Washington, Idaho and NE Oregon. However, only the Snake River was proposed for mandatory retention of hatchery steelhead as WDFW did not include similar proposals for the various sections of the Columbia River. The same management standard should apply to the pass-through fisheries in both the Snake and Columbia rivers. Also, WDFW has worked with ODFW to maintain similar steelhead fishing regulations in the Columbia River downstream of the Oregon border (near McNary Dam), as well as generally similar steelhead regulations with IDFG and ODFW for the boundary waters of the Snake River and adjacent areas of the Grande Ronde River. Similar regulations regarding bag limits and what is allowed, or required, to be retained along boundary waters and in adjacent areas reduces angler confusion and improves compliance with fishing regulations and angler satisfaction. Many anglers in SE WA, NE OR, and north-central Idaho have fishing licenses for all three states and they may fish in adjacent waters of all three states within short time periods (e.g. a day or two). Therefore, maintaining as much consistency for steelhead fishery regulations in adjacent or nearby waters is important for angler satisfaction and compliance. The same standard of WDFW coordinating fishing regulations with Oregon that applies to the lower Columbia River to maintain similar regulations and reciprocity should also apply for steelhead fisheries in boundary waters and adjacent areas of the Snake and Grande Ronde rivers.
2. Southeast Washington offers some of the best steelhead fisheries in the state, and anglers are known to travel hundreds or thousands of miles (for details see my separate comments on the proposed harvest of steelhead in the lower 2.5 miles of the Grande Ronde) to fish for multiple days, or weeks, in the Snake and Grande Ronde rivers. Many of these anglers are primarily interested in maximizing fishing opportunity and catch of steelhead, not harvest. These steelhead fisheries (for both catch and release and harvest) have been estimated to be worth from a few million dollars to many millions of dollars per year to local and state economies. The proposed mandatory retention of hatchery steelhead is likely to limit fishing opportunity and economic benefits, especially for anglers that have traveled long distances for multiple day fishing trips. Having to retain every hatchery steelhead caught could reduce the number of

hours spent fishing daily, and it is likely it would reduce the number of days of a multiple day fishing trip. In roadless areas, it could become logistically difficult to remain within the possession limits if all hatchery steelhead must be kept during multiple day float trips. The same applies to visitors that may be staying in the area for many days or weeks to fish and can't hold or process fish to remain compliant with possession limits. Otherwise, they would have to cut their fishing trip short and return home. Many steelhead anglers in the upper Snake River (near the Grande Ronde) and in the Grande Ronde River commonly catch more than 6 fish per day, so reductions in the number of hours fished per day, or successive days fished, would be a reality for some anglers if mandatory retention is implemented.

3. The upper Grande Ronde is a nationally renowned steelhead fishery with anglers coming from long distances (as many as 26 states) to fish for steelhead. Based on creel surveys, many anglers that fish the Grande Ronde River generally do not keep hatchery steelhead that they catch. The ODFW/WDFW joint steelhead creel surveys over the past three years have documented that about 50% of the anglers in the 13 mile section from Bogan's Oasis upstream to the OR border (13 of 39 miles within WA) were fly fishing and they released 60% of the hatchery steelhead that they caught. Other anglers in this zone released 30% of the hatchery fish they caught. Mandatory retention of hatchery steelhead may be expected to increase harvest of hatchery steelhead by 30% or more, and this may adversely affect upstream fisheries in Oregon by reducing catch rates or harvest there. Also, mandatory retention in the WA portion of the Grande Ronde River may shift many of these anglers upstream into Oregon if they wish to catch and release steelhead, which may reduce license sales in WA and economic benefits here.
4. Hatchery steelhead on spawning grounds do not appear to be a significant problem in the Grande Ronde drainage. Estimates of hatchery steelhead in nearby Joseph Creek (lower Grande Ronde tributary) or the upper Grande Ronde area in Oregon annually range from zero to just under 4% (ODFW and tribal data for 2011-2013 and 2000-2010, respectively). Although tributaries of the Grande Ronde River (such as the Wenaha River drainage and several smaller tributaries of the Grande Ronde) are not generally monitored, there currently is no evidence that the proportion of hatchery steelhead on the spawning grounds (pHOS) is beyond the management limits established for protection and restoration of wild steelhead. Therefore, this proposed regulation does not appear to be necessary for protecting wild steelhead in the Grande Ronde River Basin.
5. Mandatory retention of hatchery steelhead may force anglers to retain steelhead of poor quality, especially during February through early April. The fishery near Cottonwood Cr. (on the Grande Ronde) is quite popular and it can attract large crowds in February, March and early April to catch hatchery steelhead returning to the acclimation site and Cottonwood Creek. Many of these fish are not of sufficient quality at that time to be good table fare, yet anglers would be required to harvest them. This could create a situation where violations of the fishing regulations may be common because anglers may be reluctant to take poor quality hatchery fish, or they may take them and dispose of them (wastage violation?).
6. Another concern with the mandatory retention requirement is that it may bias fishery monitoring results. Non-compliant anglers will not likely admit to illegal releases of hatchery steelhead when interviewed during creel surveys; and they may deny having caught hatchery

steelhead, or they may report them as wild. Any inflated reporting of released wild (unmarked) steelhead could drive ESA estimated impacts higher than allowed under WDFW fishery permits from NMFS, or at the very least reduce the validity of the monitoring results and the estimated impacts on ESA listed steelhead.

7. Enforcement of this proposed regulation will be difficult, and probably infrequent, as it would generally require an officer to witness a hatchery steelhead being released at close range. Limited enforcement may be especially true in remote roadless areas, such as on the Grande Ronde between Bogan's Oasis and Shumaker Grade, or between Shumaker and Joseph Creek where much of the fishing is multiple day drift boat or raft trips, or on the Snake River between Lower Monumental Dam and Lyons Ferry Hatchery where anglers use power boats. Therefore, compliance will mostly have to be on the "honor system" and enforcement would not have physical evidence of illegal take to produce in court.

I appeal to WDFW and the Fish and Wildlife Commission to reconsider and not impose the proposed mandatory retention regulation for hatchery steelhead in the Snake and Grande Ronde rivers. The proposed regulation is inappropriate and unnecessary in these non-terminal fishery areas and it will likely reduce fishing opportunities and angler satisfaction with these excellent fisheries. Also, this proposed regulation would also not be consistent or coordinated with steelhead regulations in boundary waters or adjacent areas of Idaho and Oregon. However, if WDFW and the Fish and Wildlife Commission decide to implement this regulation in these areas, the likely reduction of fishing opportunity may be partly mitigated by increasing the daily bag limit and the possession limit. A daily bag limit of 5 or 6 hatchery steelhead, and a possession limit of 3-5 daily limits, may be necessary to maintain current fishing opportunity and angler effort as well as the associated economic benefits.

Thank you for your consideration.

Glen Mendel, (retired WDFW Fish Management Biologist for SE WA)