

Ashbrook, Charmane E (DFW)

From: Preuss, Lori (DFW)
Sent: Friday, February 01, 2013 3:18 PM
To: Ashbrook, Charmane E (DFW)
Subject: FW: Comments on WDFW rule proposals

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From: Jeff Bright [mailto:steelheadflyfisher@jeffbright.com]
Sent: Friday, February 01, 2013 3:03 PM
To: Preuss, Lori (DFW)
Subject: Comments on WDFW rule proposals

Hello Lori,

Please accept and consider the comments below for the WDFW 2012/03 rule proposals. My comments echo the positions held by the Wild Steelhead Coalition and those speaking for that organization. Also, please consider my closing comments.

DFW738341 Bogachiel River
DFW181021 Hoh River
DFW 986676 Sol Duc River
DFW546521 Calawah River

Support. These no-boat fishing proposals were designed to slow the decline of wild steelhead in Washington's Coastal Rivers. The stock abundance in coastal rivers has declined about 50% since the 1950's and 30% since the 1980's. This decline is due to management for making escapement only without due conservation concern for protecting spawning fish. The above areas were selected as they are major spawning areas for wild steelhead from both early and late runs. As wild steelhead begin to accumulate in these areas, boat fishers fish them hard and continually catch and release holding and spawning fish. The literature is clear on catch and release impacts; that fish caught will have a 10 to 14% mortality rate and that further but presently unquantified reductions in spawning efficiency of those that live will occur. Also, the catch and release impacts do not include those fish caught and lost but the impacts on those fish should be similar. This rule will allow fishing in these areas at a level that will significantly reduce the mortality of the early run fish that are now depleted and late run fish that are in decline.

DFW725075 Statewide
DFW858808 Statewide

Support. These rules were designed to reduce the Catch and Release mortality of wild caught steelhead. The literature is very solid and clear on this problem: that 10 to 14% of the fish released will die. There is no information on loss of spawning effectiveness but gill net caught fish loose 15%. Also, there is no information on caught and lost fish but we must assume the mortality would be similar. This rule will help reduce the decline of wild steelhead in

Washington rivers as noted in my other comments. Barbless hooks will reduce Catch and Release mortality by about 50%. Selective gear will have a similar reduction. These two rules may be the most significant change that can be made today to help wild steelhead survive from their present decline and the increasing fisher population.

DFW234122 statewide

Support. This rule was designed to reduce the introgression and competition with wild steelhead from Hatchery fish. Recent research has shown that wild fish subjected to hatchery rearing lose 35% of their productivity per generation. Segregated hatchery fish studied have lost 80% to 98% of their productivity. When hatchery fish mate with wild fish they produce progeny that retains part or all of this productivity loss as the change is due to both genetic loss and domestication selection. Hatchery fish that spawn and produce progeny compete with wild stocks for food and space and reduce the population productivity. In a recent study of 34 steelhead rivers in Washington and Oregon, the population of mixed wild and hatchery spawners lost 2% productivity for each 1% of hatchery spawners. This rule will help maintain pure wild stocks and reduce competition amongst rearing juveniles.

DFW351364

DFW685875

Support. These rule proposals eliminate the take of wild resident steelhead normally called rainbow trout in the Skagit River. Rainbow trout are wild steelhead and contribute significantly to the spawning population of wild anadromous fish. In one recent study genetic sampling showed they were parents to 40% of the returning anadromous spawners. With spawning populations now low, most areas ESA listed and most of the other areas in a long term decline, it is important to build up the spawning population and males of the resident population will contribute significant spawn. These proposals will allow continued fishing but greatly reduce the mortality via selective rules. I support the closure of harvest and the use of selective gear only for all west side fisheries for rainbow trout.

DFW764139

Support. In other hunting and fishing activities sport harvesters are required to stop their hunting or fishing activity. This rule will add further protection to wild stocks as it will stop fishing of those that have taken their annual limit.

Thank you for the opportunity to comment on the 2012/3 rule proposals.

In legal terms, I am not a resident of Washington state. But in a more important sense I am a resident of the Pacific Northwest. As such, and naturally, the steelhead is a valuable element of my identity — as it is for many, many others that call this region home. Please consider that your actions on these matters effect more than just what happens in your legal jurisdiction; instead they ripple through the entire community and effect the well being and direction of our collective culture.

Thank you for your stewardship of this significant and irreplaceable resource.

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