

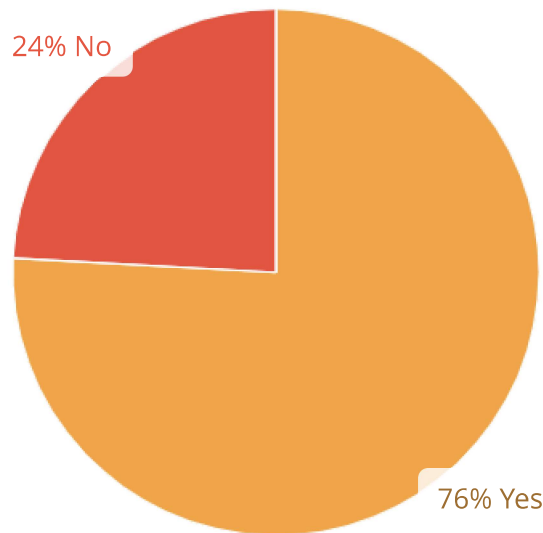
Resident native trout harvest management policy development

Project Engagement

VIEWS	PARTICIPANTS	RESPONSES	COMMENTS	SUBSCRIBERS
317	60	151	83	2

The draft policy framework has two geographic areas: an anadromous zone, and no- or limited-connectivity to the anadromous zone.

Do you think these two geographic areas are representative of the locations inhabited by resident native trout?



58 respondents

If no, please provide comments on geographic areas.

I'm worried about trout in the anadromous zone that are produced by fish not in the anadromous zone like above a waterfall or impassable culvert. I suggest combing the categories into one to cover all waterbodies or creating an additional category for areas above impassable barriers that are connected to anadromous zone and can produce steelhead and trout.

6 days ago

I am unclear how an area above an anadromous barrier would fit in like alpine lakes that have rainbow trout. In some cases these juveniles may go downstream and go to sea as steelhead, surviving to spawn below the barrier. I think this diversity is important and maybe deserves a third category or maybe you only need one category because of the diversity that exists in all geographic areas.

6 days ago

n/a

6 days ago

Maybe have three areas instead of two.....since "limited" connectivity implies that you might have impacts to anadromous fish. Or maybe just a better description of what "limited" means....

7 days ago

Specific to sea run and resident costal cutthroat, two broad geographic areas will not be able to adequately accommodate the 32 unique CCT populations. For the purposes of population management, policies set up unique to each marine area will allow for better protections of each costal cutthroat population.

9 days ago

The farmed fish are stocked both low and high lakes anyways. However, I do think we should consider two geographic areas based on the altitude; anecdotally the anglers fishing at lower lakes/rivers tend to violate the harvest rule than the ones doing at higher, thus lower waters are more in danger for resident native trout.

15 days ago

It is unclear whether these areas include the lakes that support wild resident native trout and the important life history that environment provides

16 days ago

The identical language in both tables adds no value. Recognizing the interplay of resident and anadromous forms of *O. mykiss* in a single table would improve the regulation process and reflect the interconnected nature of these populations.

18 days ago

We need to combine the "Anadromous and "Non Anadromous" Zone tables. We need to recognize the interplay of resident and anadromous of *O.mykiss* in a single table. This would help improve the regulation process and better reflect the interconnected nature of these populations.

18 days ago

There really aren't watersheds that don't have some connection to steelhead and rainbow trout that contribute to wild steelhead

18 days ago

Combine the "Anadromous" and "Non-anadromous" Zone Tables. The identical language in both tables adds no value. Recognizing the interplay of resident and anadromous forms of *O. mykiss* in a single table would improve the regulation process and reflect the interconnected nature of these populations.

19 days ago

The current terminology requires proving a conservation concern to avoid the most liberal management strategy, which is unacceptable. Changing to "Unknown Conservation Status" will better encompass most state waters and prompt a more cautious approach to management.

19 days ago

Native fish can also make their way into lakes and beaver ponds

19 days ago

Combine the "Anadromous" and "Non-anadromous" Zone Tables: The identical language in both tables adds no value. Recognizing the interplay of resident and anadromous forms of *O. mykiss* in a single table would improve the regulation process and reflect the interconnected nature of these populations.

23 days ago

Depending on how 'no- or limited- connectivity to the anadromous zone' is defined, this geographic approach may not adequately protect resident trout (*mykiss* or *clarki*) living above anadromy but contributing anadromous offspring (including ESA-listed steelhead).

Furthermore, the anadromous zone is poorly documented in WA and in some watersheds changes from year to year, confounding regulation development and enforcement. Anthropogenic barriers to anadromy should be ignored (as they are by DNR in water typing, per WAC 222-16-031), since anadromy will extend upstream when those barriers are removed.

As mentioned in the July public meeting (recorded), water temperature and flow restrictions will also be necessary to protect native wild trout from recreational fishing impacts.

one month ago

I think any study of native trout should be based on good data. Without good data we won't make good decisions. Since we have extremely limited population and migration data, from what I understand, it's hard to know if we have made a good decision here.

one month ago

The Methow River is ostensibly an anadromous zone, but separated from the ocean by hundreds of miles and 9 dams. Does that make it a "limited connectivity" zone? What are the criteria for such a designation?

one month ago

It has been documented that resident trout above anadromous barriers continue to contribute to genetic diversity in anadromous populations of steelhead and sea run cutthroat trout.

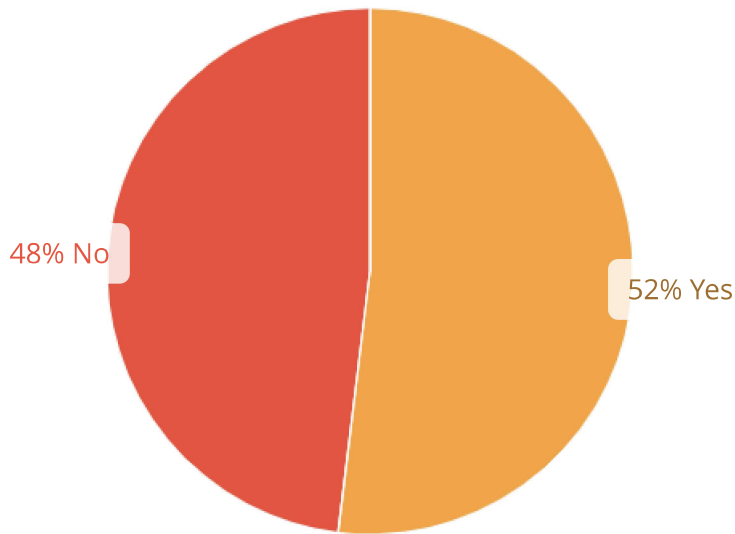
I cannot comprehend how WDFW staff with extremely limited data can allow harvest.

one month ago

The draft policy framework has three conservation categories:

1. No known conservation concerns for resident native trout.
2. Known conservation concerns for resident native trout.
3. Known conservation concerns – impacts to juvenile salmon/steelhead production, rearing, or outmigration.

Do you think these three categories adequately represent the most likely conservation concerns we have in Washington?



52 respondents

If no, what other categories should be included?

The category of "No Known Conservation Concerns" risks including areas where WDFW has no idea about resident trout populations. This category should be divided into two groupings: The first would be "No measurements or population monitoring data" to account for areas where the Department doesn't know the status of populations. The second would be "No conservation concerns" which would indicate robust monitoring that clearly demonstrates some level of harvest won't affect healthy/stable resident populations.

5 days ago

New categories should be:

- 1) No Conservation Concerns
 - 2) Known Conservation Concerns (should pull in Policy Actions a), b), c), and d) from Number 1 – No Known Conservation Concerns)
 - 3) Unknown Conservation Status
- Numbers 2 and 3 should be combined under Anadromous Zone Policy Options

5 days ago

The survey form looped me back to the beginning when the page refreshed so I apologize for duplicate responses if that is happening. I think an additional category is needed for places where no monitoring is occurring that is honest about not knowing if trout are doing well or doing poor especially if there are not goals set. I think if they were salmon or steelhead the state would be conservative in this situation like close or catch and release.

6 days ago

No. I don't understand "No known conservation concern". It feels misleading and a bit sneaky. This would require managers to go on a search for conservation concern and assumes that if there is a problem managers would know about it. I might be wrong but I think most trout in the state would fall in this category so WDFW should make it more accurate. It seems like "unknown status" would be better or "population not monitored" to highlight that it may or may not have a conservation issue.

6 days ago

Unknown Conservation Status

6 days ago

Unknown conservation status should be an additional category.

6 days ago

n/a

6 days ago

None

7 days ago

Instead of no known conservation concerns, I would like to see it changed to unknown conservation concerns. I believe this highlights the fact that these stocks haven't had proper stock assessments and little to no research done on them.

7 days ago

It ignores how wildly migratory even resident trout can be within different zones

9 days ago

The relatively unknown status of multiple costal cutthroat populations pokes hole in these categories. There should be a fourth category for lesser know and researched populations. WDFW should not make decisions regarding harvesting native trout if the health of all populations has not been fully assessed.

9 days ago

Category 1 fails to distinguish between (1) those areas with sufficient information to conclude that there are no known conservation concerns, and (2) those areas with insufficient information to conclude that there are no known conservation concerns.

Category 3 fails to consider the important adult life stages of salmon and trout and should not be limited to only juveniles.

10 days ago

There will always be known conservation concerns for wild and native trout. Number one shouldn't be an option.

14 days ago

na

15 days ago

Decimation of native and wild trout and char species. Bull trout rely on a healthy population of fry and resident trout to survive and thrive. Close all harvesting of native and wild trout. Catch and release is necessary. How come the fishing is so great in British Columbia? Why does it attract fisherman from around the world? Why does it bring money in to the industry and government? CATCH AND RELEASE.

16 days ago

Adding "Unknown Conservation Status" will better encompass most state waters and prompt a more cautious approach to management.

18 days ago

Unknown Conservation Status

18 days ago

Replace “No Known Conservation Concern” with “Unknown Conservation Status”:

The current terminology requires proving a conservation concern to avoid the most liberal management strategy, which is unacceptable. Changing to “Unknown Conservation Status” will better encompass most state waters and prompt a more cautious approach to management.

18 days ago

Replace "No Known Conservation Concern" with "Unknown Conservation Status"

I believe this does not seem accurate and reflect the true status. Changing to "Unknown Conservation Status" encompasses a better definition and encompass most state waters and prompt a more cautious approach to management.

18 days ago

Replace “No Known Conservation Concern” with “Unknown Conservation Status”:

The current terminology requires proving a conservation concern to avoid the most liberal management strategy, which is unacceptable. Changing to “Unknown Conservation Status” will better encompass most state waters and prompt a more cautious approach to management.

19 days ago

Replace “No Known Conservation Concern” with “Unknown Conservation Status”: The current terminology requires proving a conservation concern to avoid the most liberal management strategy, which is unacceptable. Changing to “Unknown Conservation Status” will better encompass the majority of state waters and prompt a more cautious approach to wild trout management.

23 days ago

N/A

25 days ago

If feel the intent of the petition is well met with this initial language. I answered ‘no’ to be able to provide comment on the record. The ‘conservation concerns unknown’ category that all the talking heads jumped on the bandwagon for in the public feedback call is far too restrictive. If we have insufficient data, the answer isn’t to shut down a citizen’s recreational activity, the answer is to have an easy hand in these initial regulations while starting to gather the data to guide better regulatory insights down the line. Common sense regulations lead to healthy civil discourse, not a revolt with people not adhering to the new rules. The way I interpret this ‘unknown’ categorization is that it would shut down ALL trout fishing since there isn’t sufficient data there - which is an insanely harsh overstep. The burden is on the conservation activists to provide data to back up their concerns, not the other way around!

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25 days ago

As well-articulated in the 7/17/24 public meeting (recorded), this approach represents the backwards-thinking that got us where we are today. This approach does nothing to address the state's acknowledged severe lack of native trout data, implying that where we have no data (almost everywhere in the state), there are no conservation concerns.

The draft policy emphasizes also considering impacts to SGCN listed species. The 2015 State Wildlife Action Plan (https://wdfw.wa.gov/sites/default/files/publications/01742/5_Chapter3.pdf) exemplifies the problem: "Quantitative abundance and trend data for many SGCN fish species are lacking. Current population or unit size was unknown for 49 percent of the species, and abundance trend was unknown for 59 percent of the species."

"Lack of data, such as on abundance, distribution, breeding habitats and/or viability status, is considered a threat for many SGCN species and will require significant investment to rectify."

"For many SGCN fish species, mortality due to fishery-related impacts (unintentional or incidental catch, illegal harvest) is a threat that continues to need direct management and public education."

This policy approach also does nothing to acknowledge or address conservation concerns resulting from cumulative effects from climate change, hatchery impacts, and invasive species impacts.

one month ago

I think that the language and classifications above are far too vague for me to give an accurate response. I missed out on the town hall on July 17 unfortunately so if there was more info provided there I'll watch the livestream. However, based on just this wording I think it's inadequate. My two cents, most of our resident trout populations don't need regulations that would increase harvest. Very few of our streams are capable of producing large populations of fish, and those that are should be protected to preserve the quality of the fishery and the population. Many streams also deal with poaching as it is, and there's already a huge lack of enforcement on our trout streams unless special interests like chinook or steelhead are in play. So saying a population has no concerns and using that as a means to justify increased harvest will only reduce the quality of these fisheries for everyone else. There's a widespread desire in the state, especially recently with excessive river closures, combined with the growing catch and release movement (that's proven to dramatically improve many fisheries as compared to harvest-dominant systems in other states and Canada) for anglers to have access to high quality trout fisheries, and if these fisheries were degraded due to excessive harvest, that would be very unfortunate and should be avoided by the state's fisheries managers.

Trout fisheries in Western Washington in particular (tributary resident rainbows and cutthroat, fall sea run cutthroat in Puget Sound rivers) have been increasingly strained lately due to total gamefish closures. Rather than worry about increasing harvest, I hope this policy will change how trout fisheries can co-habitate with the recent chinook and coho closures and allow catch and release fishing when fishing for salmon is prohibited.

one month ago

We need to evaluate the impact of our hatchery programs on wild, native trout populations. If we are concerned about holistic impacts to population health, it seems we are ignoring one of the largest ones.

one month ago

You should explain the implications of category #3.

one month ago

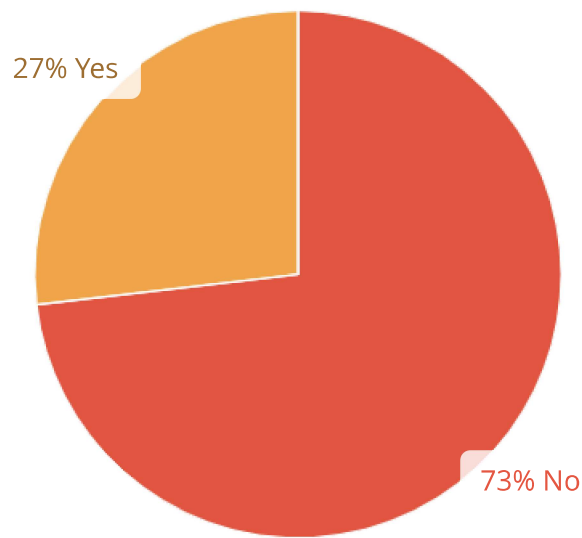
Zero harvest of native trout populations is the only solution. WDFW either operates at wide open or closed.

one month ago

To answer this question, please review the linked native trout harvest management policy options document above.

Under each conservation category is a range of draft policy statements for resident native trout.

Do you think that any one of these draft policy statement options will adequately protect resident native trout and juvenile anadromous salmonids?



41 respondents

If no, can you provide other policy statements that you think should be included?

Per my comment above, I think the "Unknown conservation concern" is too broad and leaves a loophole around populations that aren't monitored. That said, I think the distinction being made between anadromous systems and completely resident populations is an important category to consider. (Assuming adequate population monitoring is being undertaken and populations are healthy/stable enough to sustain harvest impact if allowed.)

5 days ago

there's not a place to just submit a general comment so I will do so here
please remember to continue to search for better ways to inform and enforce the policy that is set
the current app and fishing reg guidebook is so cumbersome to use that the rules are disregarded

5 days ago

a. For the "No Known Conservation Concerns" category: This will absolutely not protect intended species. This policy guidance is all about harvest and does not account for all Viable Salmonid Population (VSP) parameters. The default should be catch and release only and selective gear regulations, until WDFW has the data to show the population is healthy enough to sustain harvest without impacting VSP parameters.

b. Known Conservation Concerns: Eliminate Policy Option A and include the same policy recommendation above for 'No Known Conservation Concerns.' B: WDFW may restrict or close angling until populations can sustain angling pressure.

c. Add an extra category: No Conservation Concerns: these populations can sustain harvest without significantly impacting the VSP parameters of the populations. For fish populations with No Known Conservation Concerns status or Known Conservation Concerns status, WDFW should default to catch and release only with selective gear regulations to minimize impacts from recreational fisheries on resident and anadromous fish populations through all life stages.

5 days ago

Option C is the only one that adequately protects trout in Washington across the different conservation categories because of the lack of information in so many areas but may restrict fishing in some areas that it doesn't need to be. Erroring on the side of conservation is consistent with the mission statement and I believe the way the state manages other fish and wildlife. If an additional category included all the populations where WDFW does not monitor trout and the conservation level needed is unknown, then they could be conservative like close or catch and release and then in areas where there is in fact no conservation concern they could revert to statewide regs there or whatever the manager thinks is good like it says in option B. You need the additional category though, that seems obvious to me.

6 days ago

There needs to be catch and release for trout in all western waters. limiting harvest will limit impacts on juvenile salmon due to a decrease in participation. We need a recreational fishery that is based on experience vs harvest. Otherwise we will be in the same position we are always in. Look how incredible Puget sound cutthroat fishing is with catch and release management. It could be this way in all western streams and rivers. I've heard fish managers talk about how people aren't currently harvesting the trout and that is not accurate as someone who lives in the heart of SW Washington and knows for certain many are harvested.

6 days ago

Anadromous Waters:

The Department takes a precautionary, conservation first approach. Where populations fall within the Conservation Status Unknown category, the Department will close recreational fishing for native resident trout. The

conservation status must first be determined before proceeding with rule making to open up a recreational fishery. This conservation first approach, places the burden of status determination on the Department rather than the burden being put on the species with unknown consequence.

Once sufficient assessments have occurred to determine that Conservation Concerns are Identified, the Department has three decision pathways:

- o Where concerns are identified for both Salmon, Steelhead, Other ESA Species and native resident trout, the Department will promulgate special rules to close the recreational fishery for native resident trout to eliminate impacts from recreational fishing to depressed or ESA listed species.

- o Where concerns are identified for Salmon, Steelhead, and Other ESA Species but not for native resident trout, the Department may:

- Promulgate special rules to close recreational fishing for native resident trout to eliminate impacts from recreational fishing to depressed or ESA listed species.
- Once the Department determines that the conservation status of the native resident trout population is 'Healthy/of Least Concern', whereby there is very low risk to the present population, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, the Department may promulgate special rules to permit recreational catch and release fishing for native resident trout so long as the fishery does not place increased risk on the depressed or ESA listed population of concern. This may include changes to seasons and gear. During months of the year where high water temperatures occur, the Department will promulgate rules to close the recreational fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish.

- o Where concerns are identified for native resident trout but not for salmon, steelhead, or other depressed or ESA listed species, depending upon the conservation concerns identified the Department may:

- Promulgate special rules to close recreational fishing for native resident trout.
- Promulgate special rules to permit recreational catch and release fishing for resident native resident trout so long as the fishery will not decrease the conservation status of the population as scientifically defensible by the Department's population assessment. This may include changes to seasons and gear. During months of the year where high water temperatures occur, the Department will promulgate special rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish.

Once the Department has determined that the population is within the Conservation Status "Healthy" category, whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, the Department may:

Promulgate new special rules to permit recreational catch and release fishing for native resident trout. This may include changes to seasons and gear. During months of the year where high water temperatures occur, the Department will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish.

Non-Anadromous Zone

The Department takes a precautionary, conservation first approach. Where populations fall within the Conservation Status Unknown category, the Department will promulgate new rules that close recreational fishing for native resident trout. The conservation status must first be determined before proceeding with rule making to open up a recreational fishery and permit harvest. This conservation first approach, places the burden of status determination on the Department rather than the burden being put on the species with unknown consequence.

Once sufficient assessments have occurred to determine that Conservation Concerns are Identified, the Department has three decision pathways:

- o Where concerns are identified for Salmon, such as kokanee (*Oncorhynchus nerka*), other depressed or ESA listed species and native resident trout, the Department will:
 - Promulgate special rules to close recreational fishing for native resident trout to eliminate impacts from recreational fishing to depressed or ESA listed species.

o Where concerns are identified for salmon or other depressed or ESA listed species but not native resident trout, the Department may:

- Promulgate special rules to close recreational fishing for resident native trout to eliminate impacts from recreational fishing to depressed or ESA listed species.
- Once the Department determines conservation status of native resident trout to be 'Healthy/of Least Concern', whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, the Department may:
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- Promulgate special rules to close recreational fishing for native resident trout.
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 - Once the Department has determined that the population is within the Conservation Status "Healthy" category, whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, the Department may:
 - o Promulgate new special rules to permit recreational fishing and harvest for native resident trout. This may include changes to seasons and gear.

6 days ago

I have lived near and fished the Kettle River for over 45 years. The native redband trout are under increasing pressure from a mixture of influences.

With the effects of global warming steadily decreasing the amount of snowpack in interior British Columbia flows on the Kettle River and other free flowing rivers in the area reach critical low levels and high water temperatures during the summer and early fall months. Also, higher demand of both irrigation water and residential use over the last 40+ years has contributed to the low flows.

While the Kettle River has some restrictions on gear selection there is virtually no enforcement of the existing rules. I have seen many examples of people, some aware of the rules and others oblivious, impacting the few native redbands negatively. Few of these people, and there are more all the time, realize what a precious resource these fish are.

So what can be done to preserve a fish that has been here since the last Ice Age?

I would like to see a strict catch and release restriction on the entire Kettle River for Redband trout. I would also like to see closures when the river reaches certain low flow levels at the USGS Ferry, WA gage. Of course enforcement of any existing or new rules would be essential.

6 days ago

I totally agree with Greg Shimek and the Coastal Cutthroat Coalition's statement included here:

Position Statement: Development of a Statewide Resident Native Trout Harvest Policy by

Washington Department of Fish and Wildlife

The Washington Department of Fish and Wildlife (WDFW) is developing a policy for the harvest of native wild trout, specifically, Coastal Cutthroat Trout (*Oncorhynchus clarkii clarkii*) and wild Rainbow Trout (*Oncorhynchus mykiss*) in streams, rivers and lakes in Washington State. This policy will have far reaching implications for the management of wild trout in Washington State and represents an important area of engagement for the Coastal Cutthroat Coalition and its supporters.

Activities to monitor and research native trout in Washington State are limited compared to other states. This is largely due to a lack of resources due to the prioritization of commercially harvested species and those listed under the Endangered Species Act like populations of salmon and steelhead. Because of this, 32 of the 40 Coastal Cutthroat trout stocks in the state have "unknown" stock status and only one is designated as "healthy". For wild rainbow trout, stock status is equally uncertain.

The Coastal Cutthroat Coalition, in partnership with the WDFW and others, have carried out numerous research projects over the last decade in an effort to advance our knowledge of Coastal Cutthroat Trout. Overall, this work has shown that wild trout in Washington are smaller, younger and less abundant than they were historically, similar to many other native anadromous fish. Our work has also shown that, with careful monitoring, and responsible management using the best available science, regulations can be designed to limit risk to wild trout while recovery efforts continue.

Currently, in the absence of stock-specific information on the abundance of wild trout, WDFW is relying on research conducted in the 1980s to determine appropriate levels of harvest leading to a number of potential freshwater regulatory options for a statewide policy. These options range from retention of two fish over 8 inches to full fishery closures. None of these options consider life history diversity or the role of resident trout in supporting anadromous life forms like steelhead or expected changes in climate, habitat and human population growth.

It is the position of the Coastal Cutthroat Coalition that a strong policy for managing wild trout in Washington State will come from the use of the best available science to date and acknowledgement of uncertainty. In 2024, WDFW has no dedicated resources to monitor, manage or assess stock status of the majority of wild trout populations in the state. This lack of information should guide a conservative management approach that protects populations with unknown stock status while allowing sustainable fishing opportunity where risks have been assessed. Current and past science shows catch and release regulations represent meaningful fishing opportunity and can result in limited negative impact when monitored. In areas where current stock status information is available for wild trout and demonstrates harvest regulations would not put populations of resident or anadromous trout at near and long term risk, the Coastal Cutthroat Coalition will support appropriate harvest regulations.

The WDFW will be having a virtual town hall on Wednesday July 17, at 6:00. All details are on the WDFW website at: <https://wdfw.wa.gov/about/commission/policies/native-trout-management>
Let's support our native wild trout and the fisheries we love. Sign up for the town hall and let the department know that in the absence of stock-specific data wild trout should be managed conservatively under catch and release regulations or full closures.

Thank you for your continued support of wild native trout.

Greg Shimek

Greg Shimek

Executive Director

Coastal Cutthroat Coalition

www.coastalcutthroatcoalition.com

6 days ago

Closure should be a last resort only and should be based on sound biological data as well as extensive input from local biologists

7 days ago

I cannot, for the life of me, understand who is calling for INCREASED harvest on native resident salmonids. Our resident trout populations currently provide one of the best fisheries for catch and release in our state, particularly for the growing demographic of fly fishers. It is unreasonable to expect that we can maintain these fisheries, knowing that they are receiving increased use/pressure and subsequent mortality, and want to further compromise these populations with harvest. Please, for the love of God, just leave these as catch and release. We have put and take stocked trout fisheries for those who want to kill trout. We have countless overpopulated high lakes appropriate for trout harvest as well. We have countless lakes of panfish/bass which are overpopulated which support harvest, why are we generating even more harvest fisheries? Anglers are begging for opportunity, not harvest, and harvest of wild trout only removes opportunities, not creates them.

9 days ago

Harvesting of wild, native trout does not seem like a good idea. I would support catch and release fishery, which would provide longer seasons and least impact to trout stocks.

9 days ago

For areas with either known conservation concerns for all life stages or insufficient information to determine whether there are conservation concerns, the policy should include options to address all life stages and restrictive options when WDFW lacks information on possible conservation concerns.

10 days ago

For areas with either known conservation concerns for all life stages or insufficient information to determine whether there are conservation concerns, the policy should include options to address all life stages and restrictive options when WDFW lacks information on the possible conservation concerns.

10 days ago

The criteria for implementing these options are not stayed and at best vague. Until I see the propose draft of the actual policy, I can not make intelligent comment on their relative merits.

If I were to suggest another view I would favor one that treats the issue water body by water body and would allow WDFW fish biologists the maximum flexibility in determining the best management strategy. These folks know Washington waters best. I'm told this is already being done on certain waters.

The extreme measure of of closing every water that has populations of native species to recreational fishing fishing until studies can be done as suggested by the several, of what appeared to be special interest groups who testified during the last meeting, is unacceptable to me and many of my fellow anglers. As I am sure you know, their are a plethora of measures that can be used to protect these species such as catch and release, season closures, etc. There are other matters in the direction this seems to be taking that worry me but for now, just let our biologists do there work as they have been.

11 days ago

1) In general the policy is poorly written, not well defined, and is not data driven. 2) With these options we'll need to prove conservation concerns (data) to implement rules/regs to close harvesting of wild native trout. This is backwards and should be the other way around. The onus should be put on the data to demonstrate that there are no conservation concerns (we don't have this data). 3) Core conservation groups were not included in policy creation. 4) Wild native trout species vary greatly therefore a general policy could negatively impact one species more than another. 5) There is an overall lack of data on wild and native trout therefore the department cannot make a data driven decision. 6) the policy prioritizes harvesting over conservation.

14 days ago

WDFW WILL NOT implement new policy under general or special rules for harvesting wild native trout to eliminate impact to the populations.

In general, this policy is poorly written and not well defined. There is no option for not harvesting wild native fish - WDFW has already made up their minds.

14 days ago

WDFW WILL NOT implement new policy under general or special rules for harvesting wild native trout to eliminate impact to the populations.

In general, this policy is poorly written and not well defined. There is no option for not harvesting wild native fish - WDFW had already made up their minds.

14 days ago

I think that wdfw should somewhat follow the trout stream regulation structure of oregon. Meaning that streams are catch and release, fly fishing only unless stated otherwise. Streams with stable healthy trout populations can be open for harvest (most with no extra gear restrictions) those that are more at risk have a reduced harvest limit and more gear restrictions (single point barbless). And those at risk will be catch and release, fly only. The key would be a simple classification system, designate "classes" of rivers as A,B,C etc and post those in access points to inform the public. Also, being a vancouver resident I have another suggestion that's un related. Vancouver lake needs a larger inlet from upstream on the Columbia. I'd love to fish there without risk of my dog dying. There's an abundance of columbia water to dilute the runoff from the city. Also maybe a planting program to increase vegetation to absorb nutrients. Seems like it's worth trying instead of having to use algaecide every year. Thank you for taking feedback!

15 days ago

We may not need to make the current regulation stricter without any evidence of how harmful the current harvest rules are for the native trout population. I read the documents and existing comments on SNS-es but people discuss it with just their guts feelings. Some people enjoy fishing for harvesting, so making it stricter will loose those interest in this recreation in Washington.

15 days ago

No I cannot. However, I can't express how much I am against this. Please do not make native trout available for harvest. Catch and release is more than plenty for everyone. We're already losing salmon and steelhead. Native trout shouldn't be next on the chopping block.

15 days ago

Catch and release only. Create an amazing trout and char fishery and people will come from all over the world to fish in WA. Brings money to the state and industry. Stop all harvesting of native and wild fish!

16 days ago

No harvest of resident trout should be considered in any non-stocked body of water in order to preserve populations.

16 days ago

I would add that water temperature in a changing climate needs to be evaluated the the WDFW, and that at a minimum hoot owl hours must be instituted on rivers such as the Yakima where native salmon and trout species are of critical importance. WDFW should look to other western states for examples, such as Montana.

16 days ago

Any level of allowable kill should only be considered when monitoring shows sufficient numbers of resident wild trout. Fishery-independent surveys, such as snorkel surveys, electrofishing, or trapping techniques, are viable non-lethal methods to assess stream salmonids.

18 days ago

State fishery managers need to prioritize management and stock assessment of wild trout or adopt a default conservation strategy, such as catch and release, in the absence of defensible stock status information. A precautionary approach in situations of known uncertainty is standard practice in fisheries management.

18 days ago

Acknowledge the Lack of Information and Effort in Managing Wild Trout:

State fishery managers must prioritize management and stock assessment of wild trout or adopt a default conservation strategy, such as catch and release, without defensible stock status information. A precautionary approach in situations of known uncertainty is standard practice in fisheries management.

Initiate a Statewide Outreach Program:

Educating all anglers on the importance of resident wild trout to steelhead is essential. A statewide outreach program will foster greater understanding and support for conservation efforts among the fishing community.

Expected Policy Actions:

No Kill of Wild "Trout" Statewide in Watersheds with Wild Steelhead:

This policy should be tailored to specific river sections, tributaries, and creeks to protect vulnerable populations.

No Kill of Wild "Trout" in Gene Bank Watersheds:

These areas should not justify lethal 'trout' fishing, ensuring genetic integrity and population sustainability.

No Stocking of Hatchery Trout in the Above Scenarios:

Stocking hatchery trout can negatively impact wild populations and should be avoided in these critical areas.

Allowable Kill Based on Sufficient Monitoring:

Any level of allowable kill should only be considered when monitoring shows sufficient numbers of resident wild trout. Fishery-independent surveys, such as snorkel surveys, electrofishing, or trapping techniques, are viable non-lethal methods to assess stream salmonids.

Consider Catch-and-Release (CnR) Mortality:

New regulations must account for the expected mortality rate of 4-6% under CnR rules. While CnR offers fishing opportunities, it has impacts, which must be factored into management decisions.

Increase Monitoring of Wild Resident Trout:

Increased monitoring is crucial to document status and trends. As Scheuerell et al. (2020) recognizes, this data is essential for improving stock-recruit forecast models used to manage wild steelhead.

Thank you for considering these recommendations. Implementing these changes will enhance the management and conservation of wild trout, ensuring their sustainability for future generations.

Sincerely,

David Conrad

18 days ago

We need to be honest with ourselves in doing this right that there is a lack of information and effort in managing wild trout. State fishery managers need to prioritize management and stock assessment of wild trout or adopt a default conservation strategy and adopt rules in the absence of defensible stock status information. A precautionary approach in situations of known uncertainty is and should be standard practice in fisheries management.

18 days ago

Acknowledge the Lack of Information and Effort in Managing Wild Trout:

State fishery managers must prioritize management and stock assessment of wild trout or adopt a default conservation strategy, such as catch and release, without defensible stock status information. A precautionary approach in situations of known uncertainty is standard practice in fisheries management.

Initiate a Statewide Outreach Program:

Educating all anglers on the importance of resident wild trout to steelhead is essential. A statewide outreach program will foster greater understanding and support for conservation efforts among the fishing community.

Expected Policy Actions:

No Kill of Wild "Trout" Statewide in Watersheds with Wild Steelhead:

This policy should be tailored to specific river sections, tributaries, and creeks to protect vulnerable populations.

No Kill of Wild "Trout" in Gene Bank Watersheds:

These areas should not justify lethal 'trout' fishing, ensuring genetic integrity and population sustainability.

No Stocking of Hatchery Trout in the Above Scenarios:

Stocking hatchery trout can negatively impact wild populations and should be avoided in these critical areas.

Allowable Kill Based on Sufficient Monitoring:

Any level of allowable kill should only be considered when monitoring shows sufficient numbers of resident wild trout. Fishery-independent surveys, such as snorkel surveys, electrofishing, or trapping techniques, are viable non-lethal methods to assess stream salmonids.

Consider Catch-and-Release (CnR) Mortality:

New regulations must account for the expected mortality rate of 4-6% under CnR rules. While CnR offers fishing opportunities, it has impacts, which must be factored into management decisions.

Increase Monitoring of Wild Resident Trout:

Increased monitoring is crucial to document status and trends. As Scheuerell et al. (2020) recognizes, this data is essential for improving stock-recruit forecast models used to manage wild steelhead.

Thank you for considering these recommendations. Implementing these changes will enhance the management and conservation of wild trout, ensuring their sustainability for future generations.

19 days ago

Acknowledge the Lack of Information and Effort in Managing Wild Trout: State fishery managers need to prioritize management and stock assessment of wild trout or adopt a default conservation strategy, such as catch and release, in the absence of defensible stock status information. A precautionary approach in situations of uncertainty is standard practice in fisheries management.

Expected Immediate Policy Actions:

No Kill of Wild "Trout" Statewide in Watersheds with Wild Steelhead: This policy should be tailored to specific river sections, tributaries, and creeks to protect wild resident steelhead populations.

Also, initiate a Statewide Outreach Program: It is essential to educate all anglers on the importance of resident wild trout to steelhead. A statewide outreach program will foster greater understanding and support for conservation efforts among the fishing community.

23 days ago

I sincerely appreciate the light handed approach to start these regulations, especially as a new angler just discovering my love for trout fishing. I'm pretty concerned the proposed change to have a conservation status unknown category would stop my ability to enjoy trout fishing entirely. My counterpoint to heavy handily applying an 'unknown' status to areas without data (which from what I can gather is the VAST majority of waterways) is to think about the logistics of enforcing restrictions to non-anadromous zones. Are we going to send a warden to each stream, lake, or road servicing them and inspect everyone's catch? How are we going to realistically fund that? How many thousands of lakes and waterways are there in our state again? How many more people would you have to hire? Where would the funding for this come from? Overregulation is not the answer here, new data gathering in combination with the suggested measures is - that way we can leverage this data to ACCURATELY enforce biological regulations and not apply a blanket social regulation. If there is no data currently, then the concerns raised are not empirically founded and are just feel good ramblings with nothing to back them up. Citizens are innocent until proven guilty in the court of law, why for wildlife regulations would it be acceptable to have us guilty until proven innocent?

25 days ago

The policy options do not address the state-acknowledged risk and uncertainty existing in our data-limited fisheries (see above). The policy must be much more conservative and precautionary to address the state's significant lack of information about our wild trout populations, cumulative impacts, and climate change.

The policy options focus on harvest. They need to acknowledge and address the documented immediate and latent impacts to fish resulting from catch and release fisheries.

Policy option 3a puts the burden squarely on the resource, instead of on the managers where it belongs. The policy should read 'WDFW will demonstrate that their regulations eliminate impacts to juvenile salmon / steelhead when fishing for resident native trout.'

In all draft policy options, the word 'minimize' should be removed. Given the state of our fish populations and our lack of data, 'minimization' is inadequate and undefinable. Minimization is an approach used by the Department to weaken conservation policies.

General questions:

1. How does this policy protect cutthroat trout, rainbow trout, bull trout, and juvenile steelhead that are hooked during salmon fisheries – especially those that allow bait?
2. Why should we expect this policy will be implemented any differently than the other WDFW fish conservation policies that are routinely ignored?
3. What, exactly, did the Fish and Wildlife Commission ask for when it requested this policy?

one month ago

These categories are incredibly vague and without knowing how these policy options would be implemented on our rivers if they were approved tomorrow, I can't say that I agree with them.

I believe there should be a threshold under the normal fishing seasons that we have (memorial day weekend-Jan 31, or Oct 31 for tribs) that if salmon fishing is disallowed due to low abundance, trout fishing should still be permitted. If need be, put gear restrictions in place- single barbless, hooks less than size 4 only, flyfishing only, no fishing with a suspension device, no bait... there's a lot of ways to reduce impact on adult salmon or steelhead smolts to acceptable levels. I think that WDFW should prioritize providing opportunities for people to fish in low-impact ways and prioritize providing quality trout fisheries.

As such, I don't think there's hardly any place for expanding native trout harvest. There's no need for that. There's a huge want for access to more or existing fisheries for trout (or summer steelhead where viable). Recent closures in the last 10 years to the stillaguamish (NF in particular), Skykomish, Skagit and Nooksack have been brutal to deal with for angler who enjoy fall cutthroat catch and release or just catching trout in the upper tribs. This policy seems like it provides a great opportunity to come up with a way to keep these fisheries open while making rule changes to protect salmon. I believe wholeheartedly and from years and years of experience on these rivers that it's completely possible to have both if it needs to be that way.

Case study, the Methow has an endangered Chinook run and is only open for catch and release for trout with selective regs. Catch numbers for chinook remain low amongst ethical anglers and we've got lots of folks locally willing to call game officials when they see poachers in action. Implementing this type of regulation on the Puget Sound rivers would likely result in similar success. It's frustrating seeing lately that the growing trend is "if we can't harvest salmon, we can't catch and release for trout" on the puget sound rivers. It sucks and I hope that these policy changes will be sensible and hopefully expand fishing opportunities rather than lead to more closures.

one month ago

Without good population estimate data, its all speculation. We really have no idea. If we are not tracking impacts with good science and good data, its just the loudest voices or biggest economic interests that will dominate the process.

one month ago

You need to put these options into layman's terms. Speak to me like I am a 3rd grader. I have no ability to decipher what you're saying in this draft policy statement. Try again, please.

one month ago

Release and protect all native trout populations.

one month ago



July 17th 2024

Position Statement: Development of a Statewide Resident Native Trout Harvest Policy by Washington Department of Fish and Wildlife

The Washington Department of Fish and Wildlife (WDFW) is developing a policy for the harvest of native wild trout, specifically, Coastal Cutthroat Trout (*Oncorhynchus clarkii clarkii*) and wild Rainbow Trout (*Oncorhynchus mykiss*) in streams, rivers and lakes in Washington State. This policy will have far reaching implications for the management of wild trout in Washington State and represents an important area of engagement for the Coastal Cutthroat Coalition and its supporters.

Activities to monitor and research native trout in Washington State are limited compared to other states. This is largely due to a lack of resources due to the prioritization of commercially harvested species and those listed under the Endangered Species Act like populations of salmon and steelhead. Because of this, 32 of the 40 Coastal Cutthroat trout stocks in the state have “unknown” stock status and only one is designated as “healthy”. For wild rainbow trout, stock status is equally uncertain.

The Coastal Cutthroat Coalition, in partnership with the WDFW and others, have carried out numerous research projects over the last decade in an effort to advance our knowledge of Coastal Cutthroat Trout. Overall, this work has shown that wild trout in Washington are smaller, younger and less abundant than they were historically, similar to many other native anadromous fish. Our work has also shown that, with careful monitoring, and responsible management using the best available science, regulations can be designed to limit risk to wild trout while recovery efforts continue.

Currently, in the absence of stock-specific information on the abundance of wild trout, WDFW is relying on research conducted in the 1980s to determine appropriate levels of harvest leading to a number of potential freshwater regulatory options for a statewide policy. These options range from retention of two fish over 8 inches to full fishery closures. None of these options consider life history diversity or the role of resident trout in supporting anadromous life forms like steelhead or expected changes in climate, habitat and human population growth.

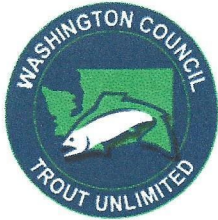
It is the position of the Coastal Cutthroat Coalition that a strong policy for managing wild trout in Washington State will come from the use of the best available science to date and acknowledgement of uncertainty. In 2024, WDFW has no dedicated resources to monitor, manage or assess stock status of the majority of wild trout populations in the state. This lack of information should guide a conservative management approach that protects populations with unknown stock status while allowing sustainable fishing opportunity where risks have been assessed. Current and past science shows catch and release regulations represent meaningful fishing opportunity and can result in limited negative impact when monitored. This position is currently in contrast to proposals shared by WDFW on July 14th where harvest would be permitted in areas where conservation status has not been assessed. In areas where current stock status information is available for wild trout and demonstrates harvest regulations would not put populations of resident or anadromous trout at near and long term risk, the Coastal Cutthroat Coalition

will support appropriate harvest regulations. In the absence of stock-specific data wild trout should be managed conservatively under catch and release regulations or full closures.

Thank you for your continued support of wild native trout and dedication to *preserve, protect and perpetuate fish and wildlife – and to manage in a manner that does not impair the resource.*

Greg Shimek

Greg Shimek
Executive Director
Coastal Cutthroat Coalition
www.coastalcutthroatcoalition.com



Andrew M. Kenefick
WSBA #18374
Washington Council of Trout Unlimited
Advocacy Committee Chair
(206) 849-7845
Andrew@WashingtonTU.org

August 14, 2024

VIA E-MAIL ONLY

Steve Caromile
Inland Fish Program Manager
Washington Department of Fish & Wildlife
Natural Resources Building
1111 Washington St. SE
Olympia, WA 98501

Stephen.Caromile@dfw.wa.gov

**RE: Washington Fish and Wildlife Commission:
Proposed Resident Native Trout Harvest Management Policy**

Dear Mr. Caromile:

On behalf of the Washington Council of Trout Unlimited (WCTU) and our more than 4,500 members across the state, we write to comment on the Washington State Department of Fish and Wildlife's (WDFW) proposed Resident Native Trout Harvest Management Policy. WCTU appreciates the opportunity to address some of our concerns with the policy options described in WDFW's July 2024 summary. <https://wdfw.wa.gov/about/commission/policies/native-trout-management> (Aug. 8, 2024). We intend to follow the development of this policy and request that we be informed of all opportunities to comment on future policy drafts.

While the policy is currently very skeletal, WCTU has several significant concerns with its overall approach. **First**, the proposed policy suggests categorizing the "anadromous" areas of the state into three categories:

1. No known conservation concerns for resident native trout.
2. Known conservation concerns for resident native trout.
3. Known conservation concerns for impacts to juvenile salmon/steelhead production, rearing, or outmigration.

The first category combines areas where there is adequate information to conclude that no known conservation concerns exist with other areas where there is insufficient information to determine if native fish are at risk and need greater protection. For watersheds and native fish populations that

have been well studied, it may be appropriate to manage the native trout recreational fishery less stringently. However, for areas where WDFW lacks robust scientific information on the health of the native fish and the threats to them, WDFW cannot and should not assume that maximizing recreational harvest is an appropriate management strategy. WCTU recommends that WDFW split this category into two categories: (1) areas with sufficient information to conclude that there are no known conservation concerns, and (2) areas with insufficient information to conclude that there are no known conservation concerns. By conflating these two categories into one, WDFW ignores the very real possibility that the native fish have significant conservation needs that we have not yet identified. WDFW should bear the burden of proof to study and demonstrate that native fish are not at risk rather than assume so simply because WDFW lacks information that they are at risk.

Second, the third category considers only juvenile salmon and steelhead, ignoring the critical adult life stage. As we have learned from the critical role resident *O. mykiss* played in the resurgence of steelhead runs on the Elwha River, the conservation and restoration of native fish must also address the harvest of adult fish in areas with either known conservation concerns or areas lacking sufficient information to conclude that there are no known conservation concerns. This category should be revised to “Known conservation concerns for impacts to all life stages of salmon/steelhead spawning, rearing, and migration.”

Third, the preceding two comments translate into our concerns with the policy options proposed. In those areas with “no known conservation concerns”, WDFW should adopt more stringent management measures for those areas that lack sufficient information to determine if native fish are at risk and need greater protection. For example, until and unless WDFW has sufficient information to know whether rainbow trout/steelhead populations in a watershed pose no conservation concerns, WDFW should impose catch-and-release/selective gear restrictions on the recreational fishery. Similarly, the third category, as revised to include all life stages, should be expanded to include stringent management options that address all life stages of native fish.

Fourth, WCTU understands WDFW’s logic in dividing the state into two geographic areas, namely those with no or limited connectivity to anadromous zones and those with anadromous zones. While we do not object to this delineation, it is difficult to support it full-heartedly given the well-known experience in the Elwha River watershed where the upstream areas would have been considered “no or limited connectivity” until the two dams were removed, and the entire watershed became an anadromous zone that has seen a remarkable resurgence in steelhead and salmon runs.

Finally, WCTU is concerned with statements suggesting that the management strategies and approaches will be constrained by “WDFW’s available budget.” WCTU thinks this is backward thinking. WDFW should develop a credible, science-based policy—irrespective of budget—that makes a strong commitment to the conservation and restoration of Washington’s native fish. Not only does Washington have legal (e.g., ESA) and treaty obligations, but we also have important recreational, commercial, and legacy reasons for conserving and restoring native fish populations. It is imperative

that WDFW establish a policy with strong commitments to conserving native fish in Washington and that WDFW use that policy to advocate for greater budget resources to carry out these commitments.

Thank you for considering these comments and we look forward to working with WDFW in the development of this policy.

Sincerely,



Andrew M. Kenefick – Chair
WCTU Advocacy Committee



Pat Hesselgesser
WCTU Council Chair

From: [Mara Zimmerman](#)
To: [Caromile, Steve J \(DFW\)](#)
Subject: Comments on Resident Trout Harvest Policy
Date: Wednesday, July 17, 2024 7:00:17 PM

External Email

Hi Steve:

My comments from the town hall on the Native Resident Trout Harvest Policy this evening:

My name is Mara Zimmerman, and I am the Executive Director for the Coast Salmon Partnership. I have a keen interest in the Resident Native Trout Harvest Management Policy as resident rainbow and coastal cutthroat trout are important fish populations and fisheries in the coastal rivers where I both work and recreationally fish. My comments this evening are my own and do not reflect the opinions of my board.

In preparing my comments, I considered the department's mandate under RCO 77.04 to preserve, protect, and perpetuate fish and wildlife as well as to authorize the take of game fish that does not impair the supply of the resource. In my opinion, the draft Resident Native Trout Harvest Management Policy does not meet this mandate. The draft policy will reinforce the status quo and is not responsive enough to the intent of the petition which was to increase statewide protection of resident forms of wild steelhead.

Under the draft policy, current harvest rules would apply to native trout populations with no known conservation concern and more limited harvest rules would only apply if a conservation concern can be proved. Since there is limited to no data available for most native trout populations, there is no information to prove conservation concern. And since there are limited opportunities to gather more data, there will be no additional information to prove conservation concern in the future. As a result, the status quo will be maintained and there will be no real change associated with this draft policy. In my opinion, there is every reason to be cautious when authorizing a harvest policy for resident native trout especially since many of the anadromous forms of rainbow trout are ESA listed and environmental conditions are changing rapidly, especially stream temperatures and flows that affect resident trout living in freshwater year round.

With that said, I would like to propose two changes in the approach to this policy.

1. My first proposal is to assign "Unknown Conservation Status" to all native resident trout populations lacking adequate data and default the fisheries in these streams to a catch-and-release fishery. If and when adequate data are obtained, the status of the population may change to "No Conservation Concern" or "Conservation Concern" and the fishery in that stream adjusted commensurate with the new status. The point is to take a more cautious approach to fish management in the absence of any data.
2. My second proposal is to restrict fishing of native resident trout during seasonal periods of environmental stress, specifically during the summer months when stream temperatures exceed 18C. This proposal should be

limited to the subset of areas where trout are exposed to these temperatures and fisheries should be either closed or operate under hoot-owl rules that restrict effort to early morning hours when daily temperatures are lower.

Thank you for considering my comments as you continue work on this important policy.

Mara S. Zimmerman
Executive Director
Coast Salmon Partnership and Foundation
100 South "I" Street, Suite 103
Aberdeen, WA 98520
Cell 360-764-6728 | Office 360-532-9113

Protect the Best; Restore the Rest
www.coastsalmonpartnership.org

April 11, 2024

Washington Fish and Wildlife Commission
Post Office Box 43200
Olympia, WA 98504-3
commission@dfw.wa.gov

RE: Rule change petition to ban bait and delay the opening of the fishing season until June 15 in all Puget Sound rivers, tributaries, and beaver ponds.

Dear Commissioners,

This is a follow-up letter regarding our petition which was denied at the March 15, 2024 meeting. The following 5 issues were discussed at, or prior to the meeting:

- 1) The Fish and Wildlife Presentation Summary Sheet presented to the Commissioners prior to the meeting.
- 2) The tactical approach as described by Kelly Cunningham.
- 3) Where WDFW stands on bait.
- 4) Delaying the opening of fishing season until June 15.
- 5) History of RCW 77.12.010 entitled Limitation on Prohibiting Fishing with Bait or Artificial Lures.

1) The Fish and Wildlife Presentation Summary Sheet

The summary sheet that Commissioners were provided prior to the meeting included the following paragraph.

“Subsequently, in 2008, the department completed the ‘Statewide Steelhead Management Plan: Statewide Policies, Strategies, and Actions.’ The document lays out the basis for operations and actions in our fundamental area related to the protection, perpetuation and recovery of steelhead in Washington: natural production, habitat protection and restoration, artificial production, and fisheries management.”

We cited this plan in our petition to show the intent of WDFW is to protect juvenile steelhead and resident rainbow, but by allowing bait, the intended protection fails. The following is copied from our petition.

The statement below is on page 14 of the 2008 document: Washington Department of Fish and Wildlife Statewide Steelhead Management Plan: Statewide Policies, Strategies, and Actions. The intent of the gear restriction recommendation was meant to prohibit the use of bait or enact selective gear rules.
(<https://wdfw.wa.gov/sites/default/files/publications/00149/wdfw00149.pdf>)

"Actions 1) In fisheries where steelhead are captured incidentally to the harvest of other species, implement regulations/selective fishing techniques that protect the wild stocks. a.

Protect juvenile steelhead and resident rainbow trout by closing fisheries during the spring smolt migration period and/or through the use of minimum fish size, gear restrictions and bag limits, or area closures during periods when the fisheries are open.”

Also in the summary sheet, is the following,

“In many of our rivers, streams, and beaver ponds rules for trout are catch and release only, when harvest is allowed there are minimum size limits in place and the daily limit is capped at 2 trout.”

There are more than 10,000 rivers and tributaries in the Puget Sound Basin and approximately 93 have either selective gear rules (no bait, barbless hooks) or ban bait. Of those, approximately 71 are designated as catch and release. Of note is that all 71 that are catch and release don't allow bait.

We agree that minimum size limits are an effective management tool. However, minimum size limits are only effective if hooking mortality can be held at a low level. Therefore, restricting the use of bait is an essential element (Wright, S. 1992. Guidelines for Selecting Regulations to Manage Open-Access Fisheries for Natural Populations of Anadromous and Resident Trout in Stream Habitats. North American Journal of Fisheries Management 12:517-527).

2) Tactical Approach

When questioned about the Native Trout Harvest Management Policy, Kelly Cunningham stated,

“We want these guidelines that are going to be associated with this policy to be effective in helping us evaluate what rules we need to put in place based on the geographic area, watershed by watershed, and not paint the entire state, or in this case Puget Sound, with a single brush stroke, we want to be more tactical than that.”

We strongly object to the “tactical approach.” What criteria will be used to determine if bait is banned in a particular body of water? A scientifically sound evaluation will require years of data collection and analysis. Even then, *O. mykiss* is known for their diverse life histories and the unpredictability of which streams and locations are used by rearing steelhead from year to year as well as the limitations to extrapolating models to broader areas based on spatially limited surveys (McMillan, July 2013. Using a Stream Network Census of Fish and Habitat to Assess Models of Juvenile Salmonid Distribution. Transactions of the American Fisheries Society).

An example of *O. mykiss* diversity and complex survival strategies is the vital role that resident *O. mykiss* play in the recovery of steelhead. Resident fish (as small as 3.5”) often spawn with anadromous fish. This includes resident fish upstream of the anadromous zone that have been documented dropping downstream and spawning with anadromous fish. These resident fish play an important role in maintaining steelhead populations when a population is struggling to survive which is the case with Puget Sound steelhead. In 1900, Puget Sound wild steelhead returns were approximately one million fish. Currently returns are approximately 14,000, a 98 percent decline in the past 120 years.

Numerous publications advise that recovery strategies should facilitate the diversity that O. mykiss exhibit. The “tactical approach” conflicts with this recovery strategy.

We also have concerns about how fish will respond to our warming climate and the resulting uncertainty this will cause in your analysis. Streams that could be overlooked currently may be vital cold water refuge areas in the future.

Another reason we oppose the “tactical approach” is the confusion that it will cause anglers. The WDFW fishing regulation pamphlet is far bigger than any other state, and from our experience, very few anglers read it for that reason. The special rules section alone in the 2023-24 pamphlet is 84 pages long, much of it dealing with selective rules and banning bait. An ongoing goal at WDFW is rule simplification. Banning bait in all Puget Sound rivers and streams will simplify the rules and provide an excellent opportunity to educate the public. We suggest signage at popular rivers and streams that explain why bait is banned and how protection of wild O. mykiss is vital in the recovery of Puget Sound steelhead.

3) Where WDFW stands on bait.

The following conversation between Commissioner Smith and Kirt Hughes left no doubt that WDFW staff acknowledge higher hooking mortality when using bait.

Commissioner Smith: “Where do we stand on bait?”

Kirt Hughes: “Bait is an extremely effective tool. When a fish takes a bait, it tends to engulf the bait and therefore gets hooked deeper in the gills in a place where the release mortality is impacted drastically.”

4) Delaying the opening of fishing season until June 15.

Our petition requests delaying the opening of the fishing season until June 15 to allow steelhead smolts to vacate freshwater habitats. Smolt trap data shows that over 90% of the smolts have emigrated by the end of May. However, smolt trap data is not the appropriate data when determining the date that smolts vacate fresh water. Smolts delay their emigration near the mouths of rivers as they approach salt water and often spend weeks in the brackish transition zone before their final migration to salt water.

5) RCW 77.12.010 (Limitation on prohibiting fishing with bait or artificial lures).

The entire text of RCW 77.12.010 is below.

The commission shall not adopt rules that categorically prohibit fishing with bait or artificial lures in streams, rivers, beaver ponds, and lakes except that the commission may adopt rules and regulations restricting fishing methods upon a determination by the director that an individual body of water or part thereof clearly requires a fishing method

prohibition to conserve or enhance the fisheries resource or to provide selected fishing alternatives.

Kelly Cunningham stated,

“RCW 77.12.010 prohibits what the petition is asking for. We don’t have the regulatory authority to categorically prohibit bait across the state so that’s a challenge to implementing this petition if you wanted to do that.”

In the early 1980s, fisheries biologists with the Washington Department of Game identified the need to ban the use of bait statewide in rivers and streams to protect juvenile salmonids, particularly *O. mykiss*. This was at a time when salmon and steelhead were much more plentiful than currently, and long before Puget Sound steelhead (including rainbow trout) were ESA listed as Threatened in 2007. The agency’s entire professional staff embarked on a statewide educational program regarding the need to ban bait as a conservation measure. The process included public meetings and special meetings with any organized group that expressed an interest in the program. There was almost no opposition to the bait ban and the new policy was approved by the Commission. Within the same time frame, a company that marketed baits (primarily salmon eggs) hired several lobbyists and succeeded in getting a bill introduced in the state legislature. The earliest version of the bill would have prevented the state agency from using bait restriction in any form as a management tool. A compromise was reached (RCW. 77.12.010) that allows the agency to use bait restrictions as a management tool but requires justification on a stream-by-stream basis. We believe if the desire is there, that RCW 77.12.010 can be rescinded through the legislative process.

The legal responsibility of WDFW is to “preserve, protect, and perpetuate fish, wildlife, and ecosystems in Washington.” These responsibilities should never be compromised by “providing fishing opportunities.” Fishing opportunities must always be limited by “harvestable surplus.”

Thank you for your consideration,

Respectfully yours,
Larry Lowe and Sam Wright

To the Washington Department of Fish and Wildlife,

As a dedicated angler who has been fishing in Washington for decades, I have witnessed firsthand the significant changes in our native trout populations and their habitats. My extensive experience includes serving on the Olympic National Forest Resource Advisory Council, holding an elected position, and volunteering with the WDFW. This background has given me a deep appreciation for the delicate balance needed to manage our native trout resources effectively.

I fully support the positions outlined by the Coastal Cutthroat Coalition (CCC) in response to the draft resident native trout harvest management policy options. In particular, I endorse the following policy options:

Geographic Area: No or Limited Connectivity to Anadromous Zone

1. No known conservation concerns:

- **Option c:** Promulgate new special rules that restrict the harvest of resident native trout. Rules should be both biologically and socially based to ensure sustainable fishing practices and garner support from the angling community.

2. Known conservation concerns:

- **Option c:** Close recreational fishing for resident native trout entirely. These closures must be biologically based, prioritizing the conservation of vulnerable trout populations and other species of greatest conservation need (SGCN).

Geographic Area: Anadromous Zone

1. No known conservation concerns:

- **Option c:** Promulgate new special rules that restrict the harvest of resident native trout, based on both biological and social considerations.

2. Known conservation concerns:

- **Option b:** Implement special rules to minimize or eliminate recreational angler harvest of resident native trout, ensuring these rules are biologically based.
- **Option a:** Implement special rules that minimize or eliminate impacts to juvenile salmon and/or steelhead when fishing for resident native trout, adhering to biological criteria and ESA terms and conditions.

Furthermore, I advocate for the statewide adoption of catch and release fishing and promoting fly fishing only for the specific resident native trout species that are the topic of this policy development. Research has demonstrated several benefits to these practices:

- **Catch and Release:** This practice significantly reduces fish mortality, allowing fish populations to thrive and reproduce, which helps maintain healthy fish stocks. It ensures that more fish survive, benefiting future generations of anglers and contributing to a sustainable fishing industry. Additionally, catch and release fishing teaches responsible

fishing practices and conservation ethics, especially to younger anglers, promoting a culture of respect for the environment and wildlife.

- **Fly Fishing Only:** Fly fishing typically uses single, barbless hooks, which cause less physical harm to the fish and make it easier to release them back into the water with minimal stress. This method is more selective, targeting specific fish species and sizes, thereby reducing the unintended catch of non-target species and minimizing ecological impact.

By implementing these practices specifically for resident native trout, we can further support the conservation of our native trout populations and ensure the sustainability of our fisheries for generations to come.

While I would prefer the option of closing recreational fishing entirely when conservation concerns suggest this approach, I recognize the significant pressures from recreational fishers. Ensuring the support of the angling community is essential for the successful implementation of these policies. Therefore, I advocate for restrictive but reasonable regulations that prioritize the long-term health of our native trout populations while maintaining angler engagement and support.

Thank you for considering my comments.

Sincerely,

-Craig Ottavelli



7/17/2024

1111 Washington St. SE
Olympia, WA 98501
Submitted via electronic mail

Re: Draft Wild Trout Harvest Management Plan

July 17, 2024

Dear Mr. Caromile and Director Cunningham,

Wild Salmon Center appreciates the opportunity to comment on the Draft Trout Harvest Management Plan.

Wild Salmon Center is a leading conservation organization working on Pacific salmon and steelhead across their entire range. We take a proactive approach to the work that we do, protecting salmon and steelhead populations with the best chance for recovery and which constitute the best potential return on public and private investments.

Wherever we work, we partner with local Tribes, First Nations, organizations, and communities, helping them to secure funding, access the best available science, develop prioritized habitat restoration plans, and implement projects with the highest benefit to salmon and steelhead. Healthy salmon and steelhead populations are important to all of us – they provide cultural connection, subsistence, thriving local economies, recreational opportunities, and their status provides a clear indication of the state of our watersheds.

We base the overall premise of our comments on the legislative mandate of both the Department and the Commission (RCW 77.04.012) which provides a clear directive to *preserve, protect and perpetuate fish and wildlife – and to manage in a manner that does not impair the resource* and given the understanding that the status of wild native trout in Washington State is unknown.

In Washington state, our scientific understanding of native trout significantly lags behind our understanding of salmon and steelhead. Given that the abundance, resilience, and stock status of both anadromous and resident forms of native rainbow and cutthroat trout are directly linked, management decisions for native resident trout have direct implications for anadromous life forms (such as with steelhead). As such, we strongly believe that the success of current statewide regulations to adequately protect native trout in both their resident and anadromous forms into the future is largely unknown.

Despite the lack in monitoring effort by the Department, where data is available, evidence from WDFW led research indicates a decrease in abundance, size, and age of resident and anadromous wild rainbow and cutthroat trout and other anadromous fish. Of particular note, is the current declining status of steelhead, the anadromous form of rainbow trout

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(*Oncorhynchus mykiss*), and Washington's state fish, as reported in the Department's 2018 Steelhead at Risk Report:

- Of the 73 steelhead populations that were or are monitored and had sufficient abundance data, a majority, 38 (52%), showed decreasing trends (abundance change < -10%) since 1980
- Statewide, among populations with available data, the long-term abundance trends of 10 populations (14%) declined by > 55% (high risk criterion 1)
- Of the 69 populations with abundance data and a defined quasi-extinction threshold (QET), 18 (26%) had a > 20% probability of abundance falling below their QET at least once in the next 20 years (high risk criterion 3)
- Of the 71 populations with defined escapement or recovery goals and appropriate abundance data, 51 (72%) did not have abundance values above their escapement or recovery goal in seven or more of the recent 10 years (high risk criterion 4)

In light of this evidence, the Department has an incredible opportunity in the development of this new management plan, to utilize best available science as guided by the conservation mandate to preserve, protect, and perpetuate native trout in both their resident and anadromous forms. Yet, as presented, the regulatory options in the draft regulation framework do little to promote the conservation of native trout. Nor do the options presented address the concerns identified by conservation organizations when petitioning the Department on the need to develop a new management plan (specific to resident rainbow trout where they may directly contribute to their anadromous form).

Based upon this 'conservation first' premise, and the table of regulatory options provided by the Department on June 14, 2024, we suggest the following revisions in writing below and as laid out in the regulatory decision matrix attached at the bottom of this document.

Overall Comments

- All rule making decisions are biologically based
- Harvest of trout in waters with "no known conservation concern" status prioritizes opportunity over conservation, going against the Department's mandate. This status should be changed to: "Conservation Status Unknown", which better reflects the current lack of data or prioritization by the Department, and places the burden of data collection and analysis on resource managers, rather than on a particular population of fish. The greatest opportunity and most defensible management approach is for the Department to prioritize stock assessment and management for native trout, and while working to collect that data, to apply a 'conservation first' management framework by default that may not conform to current statewide rules permitting harvest.
- Given the current decline of steelhead throughout the state, and that the stock status of both anadromous and native resident trout are directly linked, all recreational native resident trout fisheries in anadromous waters will be catch and release only. This provides a clear rule that is both digestible by the public and enforceable.

Anadromous Zone

- The Department takes a precautionary, conservation first approach. Where populations fall within the **Conservation Status Unknown** category, the Department will close recreational fishing for native resident trout. The

conservation status must first be determined before proceeding with rule making to open up a recreational fishery. This conservation first approach, places the burden of status determination on the Department rather than the burden being put on the species with unknown consequence.

- Once sufficient assessments have occurred to determine that **Conservation Concerns** are **Identified**, the Department has three decision pathways:
 - Where concerns are identified for both Salmon, Steelhead, Other ESA Species and native resident trout, the Department will promulgate special rules to close the recreational fishery for native resident trout to eliminate impacts from recreational fishing to depressed or ESA listed species.
 - Where concerns are identified for Salmon, Steelhead, and Other ESA Species but not for native resident trout, the Department may:
 - Promulgate special rules to close recreational fishing for native resident trout to eliminate impacts from recreational fishing to depressed or ESA listed species.
 - Once the Department determines that the conservation status of the native resident trout population is 'Healthy/of Least Concern', whereby there is very low risk to the present population, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, the Department may promulgate special rules to permit recreational catch and release fishing for native resident trout so long as the fishery does not place increased risk on the depressed or ESA listed population of concern. This may include changes to seasons and gear. During months of the year where high water temperatures occur, the Department will promulgate rules to close the recreational fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish.
 - Where concerns are identified for native resident trout but not for salmon, steelhead, or other depressed or ESA listed species, depending upon the conservation concerns identified the Department may:
 - Promulgate special rules to close recreational fishing for native resident trout.
 - Promulgate special rules to permit recreational catch and release fishing for resident native resident trout so long as the fishery will not decrease the conservation status of the population as scientifically defensible by the Department's population assessment. This may include changes to seasons and gear. During months of the year where high water temperatures occur, the Department will promulgate special rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish.
- Once the Department has determined that the population is within the **Conservation Status "Healthy"** category, whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, the Department may:

- Promulgate new special rules to permit recreational catch and release fishing for native resident trout. This may include changes to seasons and gear. During months of the year where high water temperatures occur, the Department will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish.

Non-Anadromous Zone

- The Department takes a precautionary, conservation first approach. Where populations fall within the **Conservation Status Unknown** category, the Department will promulgate new rules that close recreational fishing for native resident trout. The conservation status must first be determined before proceeding with rule making to open up a recreational fishery and permit harvest. This conservation first approach, places the burden of status determination on the Department rather than the burden being put on the species with unknown consequence.
- Once sufficient assessments have occurred to determine that **Conservation Concerns** are **Identified**, the Department has three decision pathways:
 - Where concerns are identified for Salmon, such as kokanee (*Oncorhynchus nerka*), other depressed or ESA listed species and native resident trout, the Department will:
 - Promulgate special rules to close recreational fishing for native resident trout to eliminate impacts from recreational fishing to depressed or ESA listed species.
 - Where concerns are identified for salmon or other depressed or ESA listed species but not native resident trout, the Department may:
 - Promulgate special rules to close recreational fishing for resident native trout to eliminate impacts from recreational fishing to depressed or ESA listed species.
 - Once the Department determines conservation status of native resident trout to be 'Healthy/of Least Concern', whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, the Department may:
 - Promulgate new rules to permit recreational catch and release fishing for native resident trout so long as the fishery will not decrease the conservation status of the populations of concern, as scientifically defensible by the Department's population assessments. This may include changes to seasons and gear. During months of the year where high water temperatures occur, the Department will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated port fishing mortality on released fish.
 - Where concerns are identified for native resident trout but not for salmon or other depressed or ESA listed species, the Department may:

- Promulgate special rules to close recreational fishing for native resident trout.
 - Promulgate special rules to permit recreational catch and release fishing for native resident trout so long as the fishery will not decrease the conservation status of the population as scientifically defensible by the Department's population assessment. This may include changes to seasons and gear. During months of the year where high water temperatures occur, the Department will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish.
- Once the Department has determined that the population is within the **Conservation Status "Healthy"** category, whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, the Department may:
- Promulgate new special rules to permit recreational fishing and harvest for native resident trout. This may include changes to seasons and gear.

We appreciate the opportunity to provide comment on this important opportunity to design a robust management framework for wild trout now and into the future, and look forward to continued dialogue as the policy is under development.

Sincerely,



Jessica L. Helsley
Director of Watershed Restoration

Policy Category	Scenario	Salmon, Steelhead, Other ESA Species	Native Resident Trout	Options
Anadromous Zone	Conservation Status Unknown			WDFW will promulgate special rules to close recreational fishing for native resident trout. Closures will be biologically based. Conservation status must be determined before proceeding with rule making that allows recreational fishing of Native resident trout.
	Conservation Concerns Identified			WDFW will promulgate special rules to close recreational fishing for native resident trout to eliminate impacts from recreational fishing to depressed or ESA listed species.
				WDFW may: <ul style="list-style-type: none"> i) Promulgate special rules to close recreational fishing for native resident trout to eliminate impacts from recreational fishing to threatened, depressed, or ESA listed species. ii) Once WDFW determines conservation status of native resident trout to be Healthy/ of 'Least Concern', whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, WDFW may promulgate special rules to permit recreational catch and release fishing for native resident trout so long as the fishery does not place increased risk on the depressed or ESA listed population of concern. This may include changes to seasons and gear. During months of the year where high water temperatures occur, WDFW will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish. Closures and restrictions will be biologically based.
			Depending upon the conservation concerns identified, WDFW may: <ul style="list-style-type: none"> i) Promulgate special rules to close recreational fishing for native resident trout. Closures will be biologically based. ii) Promulgate special rules to permit recreational catch and release fishing for native resident trout. This may 	

				include changes to seasons and gear. During months of the year where high water temperatures occur, WDFW will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish. Closures will be biologically based.
	Conservation Status Healthy			Once WDFW determines conservation status to be Healthy/of 'Least Concern', whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, WDFW may promulgate new special rules to permit recreational catch and release fishing for native resident trout. This may include changes to seasons and gear. During months of the year where high water temperatures occur, WDFW will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish. Rules will be biologically based.

Policy Category	Scenario	Salmon (i.e. Kokanee), Other ESA	Native Resident Trout	Options
Non-Anadromous Zone	Conservation Status Unknown			WDFW may promulgate new special rules that restrict fishing for or harvest of native resident trout. Closures will be biologically based. Conservation status must be determined before proceeding with rule making for Native resident trout fishery/harvest.
	Conservation Concerns Identified			WDFW will promulgate special rules to close recreational fishing for native resident trout to eliminate impacts from recreational fishing to depressed, or ESA listed species.
				WDFW may: i) Promulgate special rules to close recreational fishing for native resident trout to eliminate impacts from recreational fishing to depressed or ESA listed species. Closures will be biologically based. ii) Once WDFW determines conservation status of native resident trout to be Healthy/ of 'Least Concern', whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, WDFW may promulgate special rules to permit recreational catch and release fishing for native resident trout. This may include changes to seasons and gear. During months of the year where high water temperatures occur, WDFW will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish. Closures and rules will be biologically based.
				Depending upon the conservation concerns identified, WDFW may: i) Promulgate special rules to close recreational fishing for native resident trout. Closures will be biologically based.

				<p>ii) Promulgate special rules to permit recreational catch and release fishing for native resident trout. This may include changes to seasons and gear. During months of the year where high water temperatures occur, WDFW will promulgate rules to close the fishery or apply time of day restrictions to reduce higher than anticipated sport fishing mortality on released fish. Closures and rules will be biologically based.</p>
	Conservation Status Healthy			<p>Once WDFW determines conservation status to be Healthy/ of 'Least Concern', whereby there is very low risk to present populations, they do not qualify for a higher risk category, and are not likely to receive a higher threat status in the near future, WDFW may promulgate new special rules to permit recreational fishing and harvest for native resident trout. This may include changes to seasons. Rules will be biologically based.</p>

Regulatory Decision Matrix Key

Conservation Status Unknown	Conservation Concern Identified	Conservation Status Healthy	
Closed fishery	<p>Closed or limited fishery*</p> <p>*In anadromous waters, catch and release fishery only when fishery open</p>	<p>Fishery open*,**</p> <p>*In anadromous waters, catch and release fishery only</p> <p>**In non-anadromous waters, harvest may be allowed</p>	