

Comment Theme	Number of comments	Response
Needs a better description or clarification of anadromous zone and areas of limited connectivity.	4	Documents shared for comment and presented in the townhall meeting represent draft policy statement options. Based on input related to these option and additional direction from the Fish and Wildlife Commission staff will develop more extensive language describing the intent of the policy to include a glossary of terms. Additional materials developed by staff will be provided for review and comment.
Areas should be based upon watersheds, not just anad/non-anad.	1	The intent of this policy is to provide staff with guidance in consideration of and during future rule-making processes related to resident native trout. Guidance may include different objectives based on location including areas with anadromy vs areas where there isn't anadromy. Any specific rules that may be developed could be for a smaller area, <i>e.g.</i> within a watershed or at the level of an individual stream reach.
Combine anadromous and non-anadromous as it reflects interconnected nature of some populations.	9	Linking or combining areas of anadromy with areas above anadromy may reflect the interconnected nature of some populations, yet may not correctly reflect the needs for all populations. Maintaining this separation allows us to manage discreet objectives and to set rules that may be more appropriate for one situation versus another.
Change "no known conservation concerns" to "unknown conservation concerns" to better reflect the lack of data on populations and/or to be more conservative.	15	There is ambiguity which existed in both terms. In the case of "unknown conservation concern" the connotation is that any small unknown could be interpreted to as rising to the level of a conservation concern thus it considered to be too all-encompassing. The result would be perpetual management for the unknown; the result being a complete loss of opportunity when application of best management practices associated with similar streams when data are more informative would suggest conservation concerns could be interpolated and result in the application of reasonably appropriate management measures. The term "no known" allows WDFW staff to manage native resident trout populations using a precautionary approach, as it has been since the mid-80's, with biologically based rules that allow for minimal harvest where appropriate, while still assuring reproductive recruitment.
Consider geographic areas based upon altitude	1	This is an interesting idea; however it does seem somewhat arbitrary to assume delineation of populations and associated management needs could be easily categorized based upon altitude/elevation. Something like stream order may be appropriate but would be a little more difficult without GIS mapping.

<p>Keep the current but add in an additional conservation category: "No measurement or population data" or "unknown conservation concern"</p>	<p>5</p>	<p>As discussed above, the term "unknown conservation concern" is too all-encompassing. The result of this approach would very likely require closures of most waters based on the suggested implementation of this approach. In our experience, there will always be an "unknown conservation concern" for any population that is not being expressed, and/or may never be expressed, the uncertainty around this concept only allows for the single interpretation that in the absence of substantive amount of empirical data for each and every stream and reach within a stream, the only conservative rules would be 'closed waters'. Managing around unknown possibilities is an untenable situation where no amount of proof would be sufficient to state that we do not have an "unknown conservation concern". Our current rules were developed with extensive assessment of empirical data, while they there is value in re-assessing some of this work, the rules are based on the biology and life history of the fish. Even with a lack of more contemporary data from ongoing monitoring, the regulations were designed to perpetuate these species. The rules, as developed, were intended to assure recruitment and perpetuate these population; arguably they have done this for 40 years.</p>
<p>The initial language is good as is, "unknown" will shut down all fisheries</p>	<p>4</p>	<p>We agree that the term "unknown conservation concern" is too all-encompassing and could require closures of waters with the way people are asking it to be used. WDFW believes that our current suite of rules allow for appropriate harvest in most places; therefore we do not see the need to close vast numbers of waters to angling</p>
<p>Vague language/clarify</p>	<p>7</p>	<p>Yes, what was shared was just draft policy statement options which are fairly broad and don't give a lot of context, the final policy will have a definition section. Any future version being shared with the public will include definitions and will be a more complete policy. (see above related to comment #1)</p>
<p>Evaluate the impacts of hatchery programs on wild fish.</p>	<p>1</p>	<p>The only river/stream hatchery releases are CT from Cowlitz Trout hatchery and RB in Lake Roosevelt. All CT from Cowlitz Trout are adipose clipped and are a segregated brood as are Rainbow in Lake Roosevelt. Fisheries are for ad-clipped fish only.</p>

<p>Regulation suggestions (fly fishing only, catch and release, hoot owl, during high temps or low flows, closed areas), don't need increased harvest, but keep them open during salmon/steelhead closures.</p>	<p>22</p>	<p>The Fish and Wildlife Commission (FWC) received a petition for rule-making in August 2023. The FWC directed WDFW staff to develop a policy intended to provide guidance to WDFW staff when considering rule-making for resident native trout species*. Therefore, staff intend to characterize structured guidance on the development and implement rules for various circumstances and describe the type of rules that could be appropriate. To that point this policy is not intended to present specific rules that must be followed, nor to create rules additional rules to limit of increase harvest relative to current levels. All rules that have been suggested by commentors are rules that staff can apply to fish populations for certain conditions, and many have already been implemented in certain situations. Our current statewide rules were developed with extensive data and are designed to assure spawning and perpetuate the populations, and additional rules have been put in place to provide protections where needed. * Resident native species of trout include rainbow trout and cutthroat trout as well as sub-species. Resident native char (Bull Trout) are separately address in an endangered species recovery plan.</p>
<p>Policy should include restrictive options when lacking population information</p>	<p>1</p>	<p>The draft policy statements allow for restrictive options when there is a conservation concern, but also will allow for restrictive options when there is no conservation concern if the local biologist feels that an additional type of opportunity is needed/warranted.</p>
<p>Only allow harvest without impacting VSP parameters</p>	<p>1</p>	<p>VSP's are intended to help with establishing delisting goals for ESA listed ESU's and/or DPS's. Our current management of rainbow and cutthroat trout has been successful in reducing fishery-related mortality since the mid-80's by creating rules that assure all fish are allowed to recruit to reproduce at least once. We have no listed populations true 'trout'** species in Washington. ** Species in the genus Oncorhynchus are considered true trout (and salmon) whereas native Bull Trout or the non-native brook trout are in the genus Salvelinus which are technically considered 'char'.</p>
<p>Rules/needs should be determined by the local biologist that is intimate with the area.</p>	<p>2</p>	<p>Agreed, and the draft policy statements are designed to support this. It is the local biologist that has the best knowledge of the resource in their area, and this policy is intended to provide clear and transparent guidance when considering rule-making actions for their given populations and circumstances.</p>

Increased the monitoring of trout populations	7	Increased budgets to allow for increased monitoring of any/all species is always welcome, but cannot be expected or predicted. Rules are used by resource agencies across the country to help provide for the wise use of species while still affording them protections and the ability for the population to perpetuate. This policy will help provide staff with that guidance more clearly.
WDFW should take a precautionary approach to management.	5	WDFW has been using a precautionary strategy for managing trout populations in streams since the 1980's. The methods used, which have included size and daily limits along with seasons and gear restrictions, have allowed our populations to continue since that time. The methods used are biologically based.

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