



Native Fish Society

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Fighting for the Future of Native Fish

Conserving biological diversity of native fish and protecting their habitats

Nov. 24, 2008

TO: ODFW Fish Division

FR: Bill Bakke, Executive Director

Russell Bassett, River Steward Coordinator

Tom Derry, Development Director

RE: Comments on the 25-Year Recreational Angling Enhancement Plan Draft 1.1

Dear ODFW Fish Division,

Thank you for this opportunity to participate in the formation of the 25-Year Angling Enhancement Plan. The Native Fish Society commends ODFW for working to enhance fisheries, retain current anglers and recruit new anglers. We believe that the plan (as long as it is not used as a reason to increase hatchery production in flowing waters, increase kill of native wild fish, compromise conservation goals and slow down formation of recovery and conservation plans) is a step in the right direction.

NFS would also like to commend ODFW on the changes made from the first draft to the second draft. These changes show that ODFW is listening to public comment, and we hope the agency continues to do so.

NFS has the following comments on the draft plan:

Page 1, Introduction, third paragraph: The USFS Annual Survey information could use a date. Is that 2007 information? Is the data for Oregonian anglers only?

Page 1, Introduction, fourth paragraph: NFS is pleased that ODFW realizes the importance of stewardship of the natural world, as we believe this is the most important by-product of fishing. We would also like to see the social problems associated with fishing such as littering, riparian-area trampling, poaching and vandalism alleviated, and stewardship accomplishes this goal.

Page 2, Goals, Recreational Fishing Policy: This policy is a marked improvement from the original draft, and NFS agrees with it. We are especially pleased that “meet our conservation goals” was listed as the top priority. We would appreciate it ODFW would define what enhancement means. When one is at 100 percent, enhancement makes sense, but if something is less than 100 percent, the action is restoration or recovery, etc.

Page 2, Goals, Paragraph 1: NFS would like to see the Native Fish Conservation Policy guide this plan, rather than the plan guide the policy. It is our understanding that the NFCP is the controlling policy. However, it is an OAR not an ORS, and if the 25-Year Angling Enhancement Plan is passed by the legislature, it is then controlling and trumps the NFCP. It is then a question of whether the wildlife code language “prevent the serious depletion of

indigenous species” is controlling as the AG has interpreted up to now. According to the AG, the Department and Commission has an “overriding obligation” to prevent the serious depletion of indigenous fish in order to provide optimum benefits such as recreational fishing and harvest. Will ODFW please tell us whether this will be adopted by the Legislature and become an ORS or by the Commission and be an OAR. If it is an OAR, then we need to know for sure whether the NFCP is the controlling direction on the plan implementation.

Page 2, Goals, Paragraph 2: YES! The “conservation of naturally-produced native fish species in the geographic areas in which they are indigenous is ODFW’s principle obligation for fish management.” Although, hatchery-produced fish are often not consistent with the NFCP when they compete with wild fish. ODFW can try to “manage ... hatchery based fisheries to optimize user benefits consistent with conservation of naturally produced native fish species,” but in many cases throughout Oregon, that just isn’t possible.

Page 3, Goal 1, Provide diverse, stable and productive angling opportunities: While the goal has much merit, trying to provide stable fisheries in a changing environment is impractical and encourages expectations from the public that cannot be accomplished by an agency that is regulating harvest adjustments in response to declining fish populations. For example, the Willamette River spring Chinook fishery was closed in 2007 and likely will be closed in 2008. This closure is in response to an unexpected decline in hatchery spring Chinook survival. This is just one example where a promise of a stable fishery is not consistent with the facts of salmonid survival fluctuations in response to environmental and social effects.

Page 3, Goals 1.a, Enhance natural production: This is excellent and a huge improvement over the first draft. NFS would like to buy a beverage of their choice to whoever wrote and agreed with this paragraph at ODFW. We might even invite you to our annual crab feed.

Page 3, Goal 1.b, Hatchery fish to enhance harvest: As stated earlier, NFS does not want this plan to be used as an excuse to increase hatchery production of native fish in flowing waters. There is enough sound science to prove that hatchery fish degrade the wild run through reducing bio-diversity, fitness and resistance to disease. By-catch of wild fish is also an issue. Wild fish are also much better bitters. Hatchery fish should be used to keep almost extinct runs alive and to reintroduce native fish that have become extinct. Hatchery fish should not be used as a means of subsidizing the commercial fishery and should also not be used to increase the recreational fishery catch in flowing water.

There should be so many hatchery trout in ponds and lakes that do not have stream outflow that even the most inexperienced of angler cannot help but catch their limit in a day.

Hatchery program expansion and improvement of existing facilities including the backlog of deferred maintenance is an agency priority even though the agency’s own research shows that hatchery fish contribute to the decline in native, wild salmonids, many of which are ESA-listed species, others are classified as state sensitive and threatened. It is unclear how this strategy is consistent with goal one. They seem to be on separate tracks. This plan should do a better job of integrating these two goals rather than leave the public with the expectation that they can restore the reproductive capacity of wild native fish populations and run a hatchery fish stocking program at the same time.

This goal also overlooks the public's growing desire to have natural fisheries that are not consumptive and are consistent with promoting the health of the environment that produces the fish and the health of the fish and their reproductive potential. More emphasis in the plan should be placed on meeting this demand and encouraging its growth among the angling public.

The cost of hatcheries, hatchery development and repairing hatchery deferred maintenance needs to be addressed in detail so that the public is not misled regarding the hatchery options in this plan. The cost to provide a fish to catch should be done for each hatchery program and a risk analysis for each hatchery program on wild, native fish should be completed. The cost of hatchery construction and repair should be placed in the context of available expenditures required to fully implement the principle obligation of the agency to protect native wild fish in state waters.

Page 3, Goal 1.c, Assess fish populations and their performance: Native fish populations status review needs to take place every five years to determine the biological status of native fish populations. For example the Oregon steelhead status review by Chilcote in 1998 needs to be updated after 10 years to determine the status and conservation measures needed to provide the scientific basis for fishery management.

NFS supports this strategy, and we conclude that it is the primary engine the department has to protect Oregon's fishery resources, to educate the public on the status of the fishery and the reasoning behind conservation management of fish resources. Investment in status reviews, data analysis and management actions to implement findings is more important than investments in hatcheries and raising expectations of the public that stable harvest fisheries can be achieved. This should be Goal 1(b) in the plan.

Page 4, Goal 1.d, Manage to reduce impacts from predatory and competitive species: Great! Non-native predatory species are a threat to the survival of our native species and it's good to see ODFW acknowledge this in the plan. People should be encouraged to fish for non-native fish species in flowing water with no harvest limits.

Page 4, Goal 1.e, Fishing access: This goal is noble but should not be pursued if it becomes a determinant to water quality and riparian growth.

Page 4, Goal 1, Increase angling participation: Recreational angling would contribute more to Oregon tourism economy if it were special and attracted anglers from afar as well as residents. Some examples of this type of special fishery include the North Umpqua, Deschutes, Sandy and Rogue, to name just a few. The BC recreational plan is one that enhances the economic value of a native wild fishery on wild streams. Oregon has based its fishery program on hatcheries. This new angling plan should make a shift that places value and emphasis on native wild fish and wild rivers in beautiful places. That will allow Oregon to distinguish itself from other Western states and from places like Alabama tailwater fishing.

Page 2-5, Goals: NFS commends ODFW for switching Goals 1 and 2 from the original draft, as it shows ODFW realizes that Goal 2 will be reached by achieving Goal 1.

Page 4, Goal 2, Increase Angling Participation: It is unclear by this description why the agency wants to increase angling in Oregon. Is it to foster a social goal such as involvement in nature and greater appreciation and stewardship? Is it to increase the sales of angling

licenses to provide funds for the agency to carry out fish production and management? The purpose of this goal should be more clearly stated so that the public has a better understanding of the agency's motivation for increasing participation in angling. In the past, the agency has made a major assumption that anglers want to kill fish in order to have a successful time fishing. This assumption may well be missing the point of attracting new anglers and providing a satisfying experience for already anglers. With the society interested in going green, the threat of climate change and increased interest in wildlife watching and appreciation, Oregon citizens are not easily satisfied by the 19th Century-consumptive interest in fish and wildlife. The agency should focus on creating an interest in angling that is in harmony with beautiful rivers and fish and a land steward ethic of taking care of a place one loves by caring for it. One way to care for it is to fish and to learn about the fish and the place where fish are found. This is a different direction than listing the places where the hatchery truck dumped its load.

Developing advocates for healthy rivers and fish populations generates a respect and support for the state agency that is truly trying to provide it. Building respect for fish and rivers by the agency builds respect for the agency and its role in government. Right now, many Oregonians view anglers as killers who litter the landscape and don't care much about the future of their sport because they believe it will always be there with hatchery fish. The result has been declining native fish resources and lost fishing opportunity. Changing this scenario is in all our interests – the angler and the agency.

Page 6, Challenges and constraints: These bullets would be more effective if written from a standpoint of challenges to restoration of native fish, rather than as challenges to recreational angling, as the challenges to recreational angling will be fixed if the challenges to restoring native fish are overcome. If that is done, NFS would like to see ODFW add more bullets including hatchery fish introductions, fish passage at dams and road crossings, sedimentation, and storm and wastewater outflow.

Page 7, Challenges and constraints, final paragraph: Solutions are beyond the scope of this plan. In order to overcome the challenges and constraints it will take an entirely new regulatory framework (meaning changes to DLDC, ODFW, ODEQ, ODA, ODF, federal agencies and other agencies in the Pacific Northwest).

A 2005 EPA letter to ODFW regarding the Oregon Coastal Coho Plan stated similar concerns,

“Continued implementation of the existing regulatory framework in Oregon does not adequately address widespread water quality problems and will not meet the goals in the CCP”.... “there is a significant body of science demonstrating that regulatory programs in Oregon do not adequately protect water quality and associated beneficial uses (e.g., salmonid spawning and rearing, public water supply).”

New frameworks that place a priority on natural production, water quality and water flow rather than stream and fish use must be created to ensure these challenges are overcome.

Page 7, Marketing plan: Other ideas include creating a Web site where potential anglers can type in a water body to get detailed information (more information on this under simplifying the regs.); marketing non-traditional fisheries such as warm-water, shad and

high lakes; placing fishing information in Oregon tourist guides; and advertising in print and broadcast media.

A few years ago ODFW hired a firm to produce a marketing plan for the agency. To our knowledge this plan was never utilized. We would recommend that this marketing plan be given another look and the consultant contacted to provide an update where needed. The person that prepared this plan is Richard Williamson of Beaverton.

Page 8, Initiate an inland sport fish advisory board: Is this the same as the Sportfishing Leaders Group as mentioned in the previous draft? Will the same members be invited to join? NFS is grateful for ODFW for creating the group, and it is our hope that public input will guide the plan and not be used merely as a way to augment it in order to make it appear like a public process. The improvements from Draft 1 to Draft 2 show that ODFW is committed to the public process.

NFS has no goals that clash with the warm water members of this group, other than we cannot, with a good conscience, support harvest limits on warm water species in flowing water where they compete with native species.

Page 11, Use STEP to enhance angling: The ODFW default position on increasing youth anglers has been and may continue to be using salmonids as the source of recreation introduction. Our experience with children shows us that they are interested in bites. This is often provided by non-game and warm water species. We have also learned that children are not necessarily interested in killing what they catch, even though their instructor may be. Teaching angling catch and release comes easily with children by offering them a choice to kill or release their catch rather than making the decision for them, especially if the adult teaches the child about stewardship and sustainability. We would encourage the agency to provide more fishing for juveniles that rely on non-game and warm water species.

Page 12, “STEP into the Future with Kids:” NFS has concerns with creating youth-only fisheries. The idea is noble, but we believe in the importance of families fishing together. If these youth-only fisheries could be modified to include kids and their parents or grandparents, we would be more supportive of them. If ODFW decides to go the route of some youth-only fisheries in urban areas, NFS will not oppose them.

Page 12, “STEP into the Future with Kids:” NFS is concerned that modifying the work duties of the State’s 11 STEP biologist to align their time with the plan’s priorities will keep them from effectively ensuring the effectiveness of habitat improvement, nutrient enhancement, inventory, monitoring and education. If their duties can be modified so as to see no drop to the above mentioned programs then NFS could support realignment; however, we believe those programs are more important than increasing anglers, especially if those anglers are not taught to be good stewards. Effectiveness of STEP’s current programs helps the production of more wild fish, which in turn creates more anglers. Restructuring STEP to be focused on increasing anglers and not increasing fish, puts the cart before the horse, and NFS does not want the Salmon and Trout Enhancement Plan to turn into the Learn to Fish Plan.

Page 11-15, Develop resource centers for angling: If this is created, it is vital staff and volunteers focus on stewardship and sustainability, rather than take and use. It is also important to teach kids the holistic approach to fly fishing, as this tends to develop good stewards, and the fly-fishing segment of the population continues to grow despite the

decline in overall angling. We should not be teaching kids how easy fishing is, but rather to enjoy the challenge of catching fish. This Center should be open on weekends and closed on two weekdays.

Page 15, Make fishing regulations more user-friendly: This action should not be pursued to the detriment of wild fish. We would all like to see the angling regs. made simple; however, is this really possible when fishing for ESA-listed and State Sensitive Species fish? An example of an oversimplification that will harm native fish and likely have to be repealed on some rivers in the future is the kill of wild trout and use of bait on the North Coast.

In a situation where the major problem is to allocate hatchery fish among competing users, it makes sense to simplify the regulations for it is creating a sharing system on a manufactured resource with high demand. In a situation where the state is attempting to maintain, restore, recover and conserve native species, regulations on use must reflect the variation in productivity of discrete natural populations in diverse habitats and under fluctuating ecological conditions. This kind of situation does not lend itself to simplified use regulations for the purpose is more than marshalling users, the goal is to prevent the serious depletion of indigenous species so that optimum benefits can be provided to the public. This means that the life history diversity and genetic diversity of native species in diverse habitats and ecological conditions require specific conservation measures to provide optimum benefits. The state cannot treat Rogue River wild steelhead and spring Chinook as if they were a catchable trout fishery in Detroit Reservoir.

The operative word in this section is that “complex regulations MAY be a barrier to participation.” The agency may believe this, but it is not necessarily a fact. Given the conservation of diverse fish populations in a diverse landscape, habitat conditions and changing environmental conditions, necessitates angling regulations that are responsive to the specific needs of river and fish. For years, maybe decades, the agency has lamented the complexity of the angling regulations and has vowed to make them less complex with little success. The lack of success is the recognition that it cannot be accomplished if a diverse resource is to be maintained and recovered. So stop the lamenting. The agency will do better by informing the public the reasons for complex angling regulations. Since this plan is aimed at bringing new anglers into the fold, it is time to provide them with an understanding about just how complex the agency’s management job is. The older anglers come from a time when they remember generous limits and the ethic was to kill what one caught. We can choose to perpetuate that illusion or opt for a greener approach based on awareness, respect for nature and knowledge about ones role in keeping the Oregon fishery productive.

The angling regulation process is the only opportunity the public has to engage the agency on issues of management, conservation and concerns about the fishery. These are not always compatible with developing new angling regulations, but the process is used by the public to have that discussion with the staff and commission. The agency should provide an opportunity for the public to address fish management issues that could lead to angling regulations, policy changes, new plans, development of staffing needs to address management issues. Taken together, the public could become an even more useful partner in helping the staff create a better working relationship with the public and it may even result in more public support for the agency budget and program development with funding from the legislature. In addition, the public should be invited to help construct the budget rather than merely approve one the agency has adopted for public review.

Things would sure be a lot simpler if ODFW adopted no kill of wild native fish in Oregon.

A near-term compromise would be for ODFW to create a Website in which potential anglers could type in a water body and receive regulation data, population sizes, run times, species data, hatchery data, access and maps. That would simplify things a great deal. Ideally a contract, external hire or internal focus should be made with the first funding that comes out of this plan to create this Website.

Page 16, Maintain existing fisheries: The statement “Primary factors controlling the performance of a fishery include the ecology and natural productivity of a water body, ability of the hatchery system to provide fish for catch and harvest, regulation of harvest to spread out opportunity and provide the intended product ...” is misleading. A better wording would be, “The primary factor controlling the performance of a fishery is the ecology and natural productivity of the water body. Some anglers prefer to harvest fish, and the ability of hatcheries to provide this opportunity is another factor.”

This plan states that it is important for ODFW to supply the “product” anglers seek. What is that product – a dead fish – or an experience that lasts a lifetime? Beginning with the Rosen regime and carried through to the present, the agency has subscribed to a mercantile relationship with anglers. Using such terms as the “customer” or the angler and the “product” or the game reduced to possession is provided for a fee or the license. This retail symbolism structures the agency relationship with its constituent base in a rather odd way. It is cold and it is not sustainable. The public is not a partner but a satisfied customer only if killing fish is involved. Therefore the agency has confused “fishing opportunity” with killing fish rather than the larger issue of providing access to more and more restricted state waters. The goal should be a partnership relationship with the agency and making sure the opportunity to enjoy the angling experience is available. Killing the fish should be a personal choice rather than a State goal. If one were to consider the value of a released fish to that of providing opportunity, it is clear that opportunity is enhanced by releasing the fish so that another person has the opportunity to catch it. Releasing fish rather than killing them, as a purpose and function of fishing, enhances opportunity rather than punishing it. The agency has the opportunity to re-arrange its relationship to its constituents and to the resource.

Page 17-18, Maintain or enhance infrastructure and property: As stated earlier, new infrastructure should not be built to the detriment of riparian areas and water quality. Construction of piers has been shown to reduce water quality.

Angling includes having access to rivers and still waters so that one is able to go fishing. Private landowners have closed off access to keep litter and abuse of their land under control. This is often the result of hatchery-augmented fisheries where the fish are concentrated and attract a lot of anglers who are often not the stewardship-minded type. Another pressing problem that is likely to remove miles of public waters from access is the development of private hunting and fishing clubs. These clubs are accessible only to those who pay a membership fee to use the public resource. The angling plan should more adequately address this threat to fishing access, and our hope is that ODFW will have the funding needed to combat loss of access due to these clubs. Not everyone can or wants to buy a boat or hire a guide to fish public waters that provide no access across private lands.

Page 18, Use the hatcheries to enhance opportunity: As stated earlier in detail, this plan should not be used as an excuse to increase hatchery fish on wild fish in flowing water, to

include triploid trout. Sterile hatchery fish are not the answer, as there are still issues with competition, disease and by-catch of wild fish and anadromous smolts (especially since ODFW appears determined to cling to the use of bait, which has a much higher mortality rate). Native broodstock fish are not the answer, as there is clear evidence that even broodstock fish reduce the fitness and survivability of wild fish.

These programs are also more expensive, and a complete release-to-catch cost of every hatchery needs to be established. The Independent Economic Advisory Board for the Power Planning and Conservation Council completed Phase I of their hatchery cost evaluation in 2002. They found that hatchery fish ranged in cost depending on the species and location of the hatchery, but costs per adult caught ranged from \$55 to over \$200,000 per fish harvested. For example the cost to catch for Irrigon Hatchery steelhead is \$453 per fish. Phase II of the IEAB hatchery cost evaluation was not approved by the Council and a complete evaluation of all hatcheries was never completed. The value of wild fish also needs to be established.

In many circumstances, hatcheries do enhance short-term fishing opportunity. There is also more than ample information, much of it gathered by ODFW staff, that also points out that hatchery fish degrade angling and jeopardize native species and stand in the way of species recovery. This section should acknowledge both potential outcomes in the problem statement and the action plans. While it is noted that the Hatchery Research Center is working on ways to make hatchery and wild fish compatible, it should also be noted that given the weight of research findings and existing knowledge that this goal may be beyond any practical reach. Hatcheries are a tool that are appropriately used as stated in the hatchery policy, but they are not an answer to enhancing angling opportunity in each and every case as this section seems to advance. The plan should acknowledge this dichotomy rather than imply that the hatchery is always an angling enhancement tool.

The agency has investigated the use of triploid fish in the past and based on evaluation dropped this technological manipulation of hatchery salmonids. It is now before us again as a way to increase hatchery production while at the same time protecting native wild fish. This is being stated as a fact when there is no scientific support for the statement. For example, triploid trout will still compete ecologically with native wild trout and juvenile salmon and steelhead for territory, food, and can be a source of predator attraction. There is also the potential that triploid trout could serve as false spawners with fertile wild fish and defeat the productive reproduction of native wild fish. This same technology is used to crash populations of pests by introducing non-fertile mates to the breeding population. These issues must be evaluated scientifically before triploid trout are sold to the public as a meaningful source of angling enhancement. One other issue remains. That is the angling pressure associated with such enhancement of using triploid fish. The angler will be sorting fish and causing incidental mortality to wild fish while trying to catch and keep a triploid trout. Given the fact that the agency also favors use of bait and barbed hooks in the fishery, this sorting could mean fewer wild fish surviving to breed. This has the unfavorable outcome of making it more difficult to protect and recover sensitive and threatened species in state waters.

Page 19, Use the hatcheries to enhance opportunity: NFS appreciated the honesty exhibited by ODFW in the first draft when addressing the issue of disease in hatcheries, and we would like to see the following wording from the first draft be placed back into the second draft:

“Oregon has a large hatchery program to keep up with the demand, but tight budgets, aging facilities, fish disease issues and water supply problems are all pressures that make this a challenging endeavor.”

“Concern about water quality has reduced options for treating diseased fish. Most of the pathogens are treatable but therapeutics are expensive, reduce growth in fish during epizootic events and the amplification of the pathogen. Some of the pathogens are untreatable and in some cases can cause serious fish loss and create difficulties with production objectives, transfers, and the allotment of fisheries management production request. A case in point is the heavy loss and difficulties at times in releases and transfers of trout and anadromous stocks at some facilities in the state due to viruses and other pathogens. The fish propagation section advocates the use of springs or wells for hatchery water supplies, but in their absence, UV treatment is a tested and workable solution to clean water supplies.”

“Where native fish inhabit the same waters, stocking hatchery fish requires careful consideration to avoid impacts on the native fish. There is the potential for domestication of the native fish through interbreeding with hatchery fish.”

Page 19-20, Use best science available to assess fish populations, provide maximum sustainable catch and respond to angler preferences: This goal is much better stated than in the previous draft that focused on “maximum practical harvest.” The problem and action statements are also much better worded. In the first draft, the problem statement did not agree with the action statement. Angling opportunity is NOT the same as harvest opportunity. Random House Unabridged Dictionary, American Heritage Dictionary of the English Language and Webster’s Revised Abridged Dictionary all define angling as “the act or art of fishing with a hook and line, usually attached to a rod.” Furthermore these same dictionaries all define fishing as either “to catch or try to catch a fish” or “the act of catching a fish.” Nowhere in any of the definitions of the words angling or fishing does it say anything about harvesting or killing a fish. NFS understands that harvest opportunity is important to many anglers, including some NFS staff and members (although we support catch and release of native wild fish in Oregon), but in no way shape or form is harvest opportunity the same as angling or fishing opportunity. To make them synonymous is an egregious error in fact and is a determinant to the recovery of wild fish in Oregon.

It appears that ODFW has realized this, as the second draft makes a clear distinction between the two. NFS commends ODFW for correctly making the distinction and hopes it will continue to do so in all future comments and writings.

NFS also applauds ODFW for focusing on sustainability and not maximum practical harvest. Smart, very smart.

Using best science to make management decisions is the foundation of the plan and it is too far down the list of things to do. It should be up front as a priority for the agency to accomplish its goals for the plan. In terms of budget requirements to support this work given the current and potentially long-term budget problems, this work should be given a priority in the agency for support of this plan and other management policy and plans.

That being said, while NFS agrees that best science should be applied when establishing harvest on wild fish, we are not convinced that ODFW is using best science when allowing harvest of wild fish. An example is the evidence provided by ODFW in support of kill of wild steelhead and trout during the recent angling regulation process, as is the reduction of ODFW’s wild-spawner abundance goals based on less spawners in later years. We believe kill should not be allowed on wild native fish unless the population

shows a significant linear increase of wild fish (15 percent or more) over a 50-year period and the base population is a minimum of 50 percent of the historical population. Like most fishermen, NFS would like to see enough abundance to have a recreational harvest on wild fish, and we encourage ODFW to make a commitment to achieving wild fish abundance.

Anglers who want to harvest hatchery and non-native fish should be encouraged to do so.

Page 21, Incorporate information from other disciplines: This is a very forward thinking approach and is needed. The agency would benefit by having more economic and social expertise reviewing the fish management program, including this plan. An independent expert source would be preferred over having the expertise on staff for two reasons: One it is likely cheaper than a staff position and offers more flexibility to choose the expertise, and it is responsive to the need for unbiased assessment. In addition to having this expertise review agency programs, it would be necessary to have them review the agency culture and institutional structure. This review would help the agency evaluate its own slant on its management mission and help it be more responsive to that mission and the public that it serves.

Page 22, Staff and organize ODFW to improve support for recreational fishing, bullet one: NFS supports an increase to ODFW fisheries staff as long as those new staff members are focused on achieving wild spawner abundance and not harvest opportunity and not hatchery production to achieve it.

ODFW used to have a state-wide trout manager and a steelhead manager. Management plans for both species were adopted by the Commission and the statewide manager was both a coordinator among staff to make sure these management plans were carried out and amended as needed to meet specific conservation requirements. These statewide managers were also an important source of information and provided important contact to anglers on issues. These statewide managers were eliminated, and it is important to re-establish those positions to improve trout and steelhead management in Oregon.

Page 22, Monitor progress of the plan and success of the actions undertaken: A monitoring plan with measurable criteria needs to be developed before the implementation of this plan.

The monitoring plan should identify life history and genetic diversity, watershed productive capacity, nutrient-load goals, and wild spawner abundance objectives by species and life history. The status and health of our wild native fish populations is vital for they provide the basis for a successful recreational fishing experience that distinguishes Oregon from other states that rely on hatchery production.

Page 23, Plan implementation: In the previous draft, sterile hatchery fish in flowing water were listed as an action item. Even though it is not listed under plan implementation in the second draft, NFS is concerned enough about it to make these comments: Sterile hatchery fish should not be placed in flowing water bodies. We would prefer that this action was not addressed until adequate research has been done on the subject. Based on the presentation by ODFW at the last Fish Cons meeting, NFS is not convinced that the research shows that the impacts to wild fish are reduced enough to warrant stocking of sterile fish. A compromise would be to place sterile fish on rivers were there would be no (or very, very slight) impact (<.1 percent mortality) to wild fish. Another would be to not allow bait.

Page 23, Plan implementation: In the previous draft, ODFW listed a new hatchery in Portland as an action item. NFS cannot support a new hatchery in the Portland area if the fish from this hatchery are used to seed flowing water.

General budget comment: ODFW should not implement the plan without the needed increase in funding. NFS is worried that this plan could become an unfunded mandate, which would likely create more problems than it solves.

The plan admits to the budget problem associated with implementation of this plan. The funding may not be available to do all of it, so the plan should identify its priorities. How will the first dollar be spent to accomplish this plan and how will plan development progress as more funding becomes available? The plan should have an estimated cost for each action item identified and the agency expectation for completing that action item given budget constraints. The public would then have an opportunity to see these costs and be better prepared to set priorities.

As stated earlier, NFS is glad that ODFW has constructed this plan, and we believe it is a step in the right direction as long as does not increase hatchery fish on wild fish, does not increase harvest of wild fish, does not comprise conservation goals, and is not given more importance than the creation of recovery and conservation plans.

NFS realizes that some members of ODFW will not agree with some of our comments, but we appreciate that ODFW realizes that there is a large contingent of people who fish in Oregon (and naturalists and environmentalist who could potentially become anglers) who value wild, native fish abundance and support catch and release of wild fish. We hope that ODFW realizes that this contingent is growing and will likely continue to grow as climate change and other issues force people to “go green.”

We also realize that some members of the advisory group will not agree with some of our comments, but we very much look forward to working with them to enhance fisheries in Oregon.

Sincerely,



Bill Bakke
Executive Director



Russell Bassett
River Steward Coordinator



Tom Derry
Development Director