



## **The Conservation Angler supports WDFW Regulations for Western WA and the Olympic Peninsula**

My name is Pete Soverel, Founder and President of The Conservation Angler. We are based in Edmonds, WA.

TCA is here to talk about action taken in late 2020 that should have been taken long ago.

I have fished on the Olympic Peninsula since 1969. During that time, I have been deeply involved in wild fish conservation on the OP with WDFW Advisory Groups, as a citizen-activist and with organized conservation initiatives. I consider the OP my home waters as do many others.

The situation we now find ourselves is no surprise to anyone who fishes on or lives on the OP. There has been a decades-long decline in wild fish abundance and productivity that preceded our present position.

- ✓ When I first began fishing there, there were few anglers and many wild fish.
- ✓ WA's population has grown as have WA anglers as well as anglers visiting from across the country.
- ✓ Now, there are many anglers and few wild fish. Anglers are more effective and we catch too many fish.
- ✓ WA's wild steelhead management practices over the past 100 years have been complete failures, with the exception of the OP and Western WA, WA wild steelhead are either extinct or listed under the federal ESA.
- ✓ Puget Sound wild steelhead fisheries are the most recent failure - managed with an over-reliance on a flawed hatchery solution - resulting in large-scale closures – and sending more steelhead anglers to the OP and further increasing angling pressure on a shrinking population of wild fish.
- ✓ OP habitat is the best riverine habitat left in WA with much of the headwaters within a National Park, undeveloped estuaries, and low human density – habitat is not a principal limiting factor.

I must repeat my earlier statement: Our current situation is no surprise to anyone – we are at the end of a long decline in wild fish abundance and productivity that precedes our present position.

WDFW has taken the right action, albeit micro-steps, in this situation. They took this action not in haste, but after careful monitoring and evaluation of the best available scientific data on the health of the fish, the power and impact of the fisheries and they have done this in consultation with tribal co-managers and diligent and broad-based discussion with all interest groups.

We are here before this committee today because WDFW and the Tribes have taken action to protect wild steelhead. This action should have been taken long before the wild steelhead of Western WA and the OP came to teeter on the brink of no return. Furthermore, there is no biological merit to the objections being levied against WDFW management.

Make no mistake, based on a long-term decline, the OP's wild steelhead populations are eligible for listing under the federal ESA. We have limited time to stop the decent towards extinction.

The principal focus of management must be on conservation of the wild animal – in this case – Washington's State Fish. The NW Treaty Tribes have adjusted their practices and rest of WA needs to as well. The legislature should be focused on the future of wild steelhead in Washington - and accept the reality check that the commonly used solution - producing more hatchery fish - is the wrong and more expensive course. The wild fish have no voice and no elected representation but we are here to speak for these wild steelhead.



## **Submission of Materials to the Washington Senate Agriculture, Water, Natural Resources & Parks Committee**

**January 11, 2021**

**Materials Prepared and submitted by David Moskowitz, Executive Director, The Conservation Angler**

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The Conservation Angler has spent considerable time working with WDFW and other concerned organizations and individuals to understand the current situation and propose options for action to stop the decline and help develop a future management regime that restores the productivity, abundance, resilience and sustainability of wild steelhead and trout on the Olympic Peninsula and in Western Washington.

We attach below letters and comments delivered to WDFW as they wrestled with the data they were collecting and as they came to understand the dire nature of the 2020 – 2021 estimated forecast for returning adult wild steelhead.

The long-term trends and the future forecasts cried out for action, and thankfully, WDFW made the right choice for this current season. While much of the evidence on wild steelhead returns would have supported closures, The Conservation Angler and other organizations believed that there were options that provided angler opportunity while protecting the low numbers of wild steelhead from too many encounters.

### Materials Attached:

1. TCA Memorandum to WDFW with Appendix (November 30, 2020)
2. TCA Memorandum to WDFW (December 2, 2020)
3. Joint Letter to Washington Fish and Wildlife Commission (December 10, 2020) (Does not include scientific references nor attached reports that accompanied the original letter to the WAFWC)

1. TCA Memorandum to WDFW with Appendix (November 30, 2020)



November 30, 2020

James Losee  
WDFW Region 6 Fish Program Leader  
Montesano, WA

Dear James,

The Conservation Angler appreciates your out-reach regarding Washington Coastal winter steelhead management. We also appreciate the short-term willingness to consider conservative management during the current period, but we expect stronger leadership from the Department in this time of crisis. TCA is asking WDFW to get beyond the year-in, year-out fishery management decisions that are being made without context and without any sort of vision tied to a future goal for this region, or even as part of a statewide plan.

That said, the management options outlined during the November 24<sup>th</sup> webinar are incomplete and inadequate. Coastal wild winter steelhead populations are in long-term decline. When large scale hatchery releases began in the mid-1960's, wild populations in Washington's coastal rivers numbered in the many thousands - making a sick joke of Boldt-approved escapement goals (2,400 for the Hoh; 4,000 for the Queets as these rivers hosted returns of ranging from 12-15,000 adults).

There are probably many factors contributing to this long-term downward trend, but one conclusion is inescapable: excess harvest and adverse responses to increased hatchery releases are major factors and the limiting factors within WDFW's greatest management authority. In other words, the harvest plans predicated on the Boldt-approved escapement goals authorize:

- a) excessive harvest,
- b) loss of life-history diversity with the collapse of summer-run and early winter run components,
- c) Court-ordered and agency-maintained escapement levels set too low to sustain the populations.

Routine failure to meet escapement goals throughout the region means that management/harvest parameters adopted by co-managers are not effective or appropriate in sustaining wild populations – tribal harvests are too high, incidental angling mortality is too high, and hatchery impacts are too numerous. All these factors are subject to direct WDFW/tribal control.

Co-managers need to come together to craft a comprehensive management regime which will restore and sustain wild steelhead abundance and life-history diversity while protecting tribal values and angling opportunity. The rivers in question are the healthiest in terms of functional habitat (National Park, Federal and State forests, few passage barriers, or out-of-stream water withdrawals) remaining in the state yet current wild fish populations are small fractions of historic levels - even in watersheds largely protected in the Olympic National Park.

Based on these conclusions, none of the options presented during the November 24<sup>th</sup> webinar address these fundamental issues in a comprehensive manner.

In general, TCA does not favor closures as they may close out the fish's most ardent advocates - those people and communities that interact with the fish and care the most about them. Closures should be the last option. Thus, co-managers should explore mechanisms that decrease mortality while preserving opportunity. The options presented last night are incredibly timid given the need to begin rebuilding for wild steelhead populations in the coastal management zone.

At issue is determining which management options might be utilized to protect, to the largest extent possible, angling opportunity at the lowest mortality level on a river-by-river basis.

### Options that Must Be on the Table

The 10% conservation threshold establishes the allowable angling related mortality for depressed populations. TCA outlines a set of options which can reduce angling related mortality. Other jurisdictions around North America, including WDFW hunting regulations, have used variations of the options outlined below – they are not revolutionary or untested:

- No fishing from any floating craft (ex. hunting – road closures and ATV restrictions)
- No bait (ex. no hunting with bait, no mammal hunting with dogs)
- Limited entry: maximum daily/weekly number of anglers; maximum number of non-resident anglers; maximum number of daily guided anglers; restricted guide licenses; differential daily license fees between residents, non-residents, non-resident aliens; etc. These options are easily implemented with on-line licensing per river with charges adjusted by category – resident, non-resident, etc. (ex. Atlantic salmon fishing is managed by river and by day in eastern Canada)
- “No guide” periods or “no guide” river reaches
- Gear restrictions effectively reduce encounters and efficiency rates. The anglers and guides know which techniques are most effective. To reduce the encounter rate, anglers must reduce their effectiveness (ex. Flyfishing (especially with floating lines and unweighted flies) would be the least effective technique and reduce the encounter rates while allowing opportunity.)
- Require gear that results in fewest hooking injuries to adult steelhead and non-target fish such as requiring floats and jigs, but not allow floats with pegged beads (Ex. Prohibit gear that is effective and causes the most harm to hooked fish)

### Application to the Coastal River Watersheds

The closer the predicted run-size is to escapement goal, the more restrictive the package of restrictions that would be applied. For example, for the 2020-2021 season, Chehalis, Humptulips, perhaps upper Quinault, Queets, and Hoh which either fail or barely meet escapement, the most stringent restrictions should be adopted: small number of daily licenses, fly fishing only, specific terminal tackle in terms of hook size, weights etc., no fishing out of boats, possibly no guide days. With a much larger predicted run on the Quillayute, a somewhat less restrictive set of regulations could be applied – however, even though meeting escapement, the Quillayute wild steelhead runs are in long-term decline, suggesting harvest limits are too high and are unsustainable.

Such modulated regulatory regimes provide continued angling opportunity with lower mortality on wild steelhead and on other non-target native fish. Hunters have long adjusted to this concept: if you want to hunt elk over an extended time frame, you must use archery equipment; if you want to hunt trophy elk, you have to draw a limited entry tag and so on.

It is a well-established fact that hatchery regimes harm wild fish populations. At a minimum, as coastal wild runs decline, WDFW should commensurately reduce hatchery releases to limit adverse impacts on the declining wild populations. Additionally, with reduced marine and ocean productivity, hatchery fish survival will be lower and production should be reduced commensurably - even if it continues to remain an authorized practice.

Finally, coastal wild summer runs and early-run timed winter steelhead populations are in deep, deep trouble. The former historically numbered in the thousands while today they have been reduced to a few dozen in most rivers. Early-timed winter runs (November-January) historically comprised at least 60% of the total population. Today, they are on the verge of local extirpations while late-returning winter runs (which historically comprised no more than 10%-15% of the total run) now represent at least 90% of the returning population. Wild winter steelhead cannot be recovered in the absence of recovering the full assemblage of life-histories within each river specific

population. The early-return wild winter steelhead have borne the brunt of WDFW's mismanagement for decades – double-walloped by excessive harvest and hatchery steelhead interference.

The fix? Greatly reduce steelhead hatchery production and revise the release strategies so the agency can stop using angler effort as the method to address the agencies' hatchery addiction.

A final matter, when the Washington Fish and Wildlife Commission adopted wild release regulations on the coast, those regulations were explicitly predicated on the premise that the non-tribal harvest share that we anglers were forgoing would be allocated to increased escapement. WDFW promised that it would defend the premise. We would like to learn whether this has been the case: i.e., have tribal harvest encroached on the sports forgone share meant to escape to the gravels?

TCA has attached an appendix that presents a wider range of possible regulatory options for reducing encounter rates while not sacrificing angler opportunity.

Respectfully,

A handwritten signature in black ink, appearing to read 'Pete Soverel', with a long horizontal flourish extending to the right.

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## Appendix 1:

### **20 Angling Regulations to conserve wild steelhead while allowing angler opportunity**

1. Limit daily angler effort by issuing daily tickets via internet. For example, Hoh will barely meet escapement (if tribal catch does not catch our share and theirs). Set daily limit of sports anglers (say 30). Issue 30 daily tickets by internet. Recipients may hire a guide if they wish. WDFW could even allow a set number of guided anglers that the guides would purchase up to one week in advance. If the return is larger than predicted, increase daily tickets; if less, reduce daily tickets: This option is easily affected using an online selection window on the WDFW angling license website.
2. Implement fly fishing-only regulations as a CONSERVATION measure (based on RS Hooton study in BC finding that one gear angler has same impact on fish as 68 fly anglers); May need to restrict fly fishing to unweighted flies or lines in systems not meeting escapement.
3. Alternating daily openings/closures (like goose hunting). For example: open Sunday-Monday, Thursday-Friday; closed: Tuesday-Wednesday, Saturday.
4. Require Guide Log Books that record number of anglers, number of hours/day, number of encounters, number of fish landed by species/sex/type of gear and tackle, hook location, number of fish kept by species, sex, size, number of fish safely released, other observations.
5. Restrict Time, Place and Manner – all to reduce the encounter rate on specific waters.
6. No fishing from a floating device (no watercraft and no side planers)
7. No boat areas – pass through zones, reserved for walk-in anglers
8. No Bait – lowers encounters and reduces lethality to juvenile salmonids and all trout.
9. Barbless hooks required for all angling in all regulations.
10. Bag limit reductions – require anglers to rack their rods after individual limits reached.
11. Hook size regulations – require all hooks be a certain size or smaller
12. Restrict number of total hooks allowed on a line or lure.
13. Wild fish requiring release must be kept in the water during landing and safe release.
14. Early season closure or start to protect early-return wild steelhead (open hatchery racks to prevent hatchery fish escapements to increase).
15. Limit number of guides for each river or by days.
16. Require anglers to buy licenses by day or by openings by area or zone.
17. Limited entry on open waters to address impacts of effort shifts and to reduce encounter rates on rivers with low escapement.
18. Ask anglers to turn in angling info (catch card) to earn preference points for future limited entry drawings.
19. Restrict angling from boat to reduce impacts and encounters with non-target fish.

2. TCA Memorandum to WDFW with Appendix (December 2020)



## Memorandum

To: James Losee, WDFW Regional 6 Fisheries Manager

Cc: Jennifer Whitney, WDFW

Fr: Pete Soverel and David Moskowitz

Dt: December 3, 2020

Re: Comments on WDFW Proposed Regulations for Western Washington Winter Steelhead Fisheries in 2020 and 2021

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The purpose of this memo is to frame the proposed regulations that you outlined on our December 2 call and to provide our response and rationale to the draft proposals.

Our re-cap of WDFW Draft Regulatory Regime:

1. The following regulatory scheme would apply to all seven (7) rivers in the region
2. Gear would be restricted to barbless hooks and no use of bait
3. No angling would be permitted from any floating craft
4. All rainbow trout would require safe release regardless of size
5. Bag limits would be one hatchery steelhead of legal size
6. Seasons would be retroactive to December 1 and would extend through March 31, 2021 on all rivers except those rivers flowing into Willapa Bay where the season would close on February 28, 2021

TCA's response and rationale:

WDFW's Draft Proposed Regulations are a good start, and we appreciate the strong effort to conserve wild steelhead and applaud the innovative options for maintaining a fishery in the face of a conservation crisis. TCA would like to avoid using closures if possible, but the estimated escapements leave little flexibility, and consequently, we believe it is critical to put the fish first in those rivers. Accordingly, we have the following comments:

1. The overall regulatory scheme is robust but cannot be fairly applied to all rivers.
  - a. The Chehalis and Humptulips are too far below escapement goal to allow angling and without reducing encounter rates even further - should be closed.
  - b. The same rationale applies to the Queets as it is too far under escapement goal, though it could be open until December 31 under a restrictive regime to allow hatchery fish harvest for fish heading back to the Salmon River.
  - c. The Hoh escapement is too close to the bone and if opened, must have a more restrictive regulatory regime applied, and should close on February 28 no matter the set of rules applied.

2. Barbless hooks and no use of bait are a strong regulation. TCA remains concerned about the effectiveness of pegged beads and their impacts to adult and juvenile salmonids, trout, and non-target fish.
3. No fishing from a floating device is a strong regulation. It should include prohibitions on fishing from any inflatable device and apply to side-planning devices deployed by an individual angler fishing from the bank.
4. The rainbow trout regulation is a good conservative regulation and should be extended into summer for those rivers where the regulation is not already in place.
5. A one-fish bag limit is a good way to reduce encounters but must be accompanied by a requirement for any angler who tags a hatchery steelhead that they must “rack their rod” and not be permitted to continue fishing.
6. Shorter seasons are a positive step and will protect steelhead staging and spawning. WDFW should revise its spring and summer season dates so that the closures have meaningful impact on the full range of steelhead spawning timing. At the same, for similar reasons, TCA would prefer a closure in December on non-hatchery rivers to protect early timed wild fish and help rebuild that component of the run – long a serious flaw in WDFW's wild steelhead management practices.

While we appreciate the challenges WDFW faces this season, our focus is equally on constructing and implementing a vision that can help rebuild wild steelhead and provide sustainable fisheries that achieve necessary conservation goals. Actions and management considerations, we think are important for future years include these options:

- WDFW should provide the total estimated encounter rates by gear/angler type prior to each fishing season so that anglers can better understand the impacts. This would improve education of anglers over time and increase their ability to understand how data is collected, analyzed, and then applied. Such transparency would be helpful for TCA to support future regulations and/or season closures by WDFW.
- Consider alternating week closures, such as having a river open one week and closed the next. This would ensure wild steelhead and other salmonids can complete their life cycle without distractions from anglers and boats. The sheer number of anglers, almost regardless of fishing method, has become so unwieldy that we are concerned about the overall status of the ecosystem and believe the populations would see benefits from bi-weekly closures. Of course, some years the open weeks would potentially be unfishable due to high water, providing further respite for the fish. The benefit is that with such closures, seasons could potentially be extended for longer periods owing to the reduced encounters.
- Further restrictions on terminal tackle to reduce effectiveness and encounter rates (limit use of additional weight, number, and size of hooks, prohibit most effective lures). For example, we would like to see a study that evaluates the bycatch of anglers that fish beads/glow bugs and



other gear types where the hook is “pinned” several inches away from the lure. We believe that anglers using those methods are encountering juvenile steelhead, cutthroat, whitefish, and bull trout at very high rates compared to other methods, and because the hook is large and pinned away from the lure, many smaller fish are hooked lethally in the eye, brain, or stomach. Further, even handling of steelhead smolts could be lethal given their scale loss and physiological stress. We are concerned about this type of bycatch and think this method of fishing needs to be evaluated to determine if WDFW is fully accounting for all angling effects.

TCA needs to see the data on the expected encounter rates and effort so we can evaluate what the wild fish “savings” might be earned under this regime so that we can fully support the proposals you presented, particularly those you may amend based on our suggestions noted above.

Thank you for being available and for pushing forward on difficult decisions – making them for the wild fish now will hopefully provide for the fisheries later. Never forget that one comes before the other.

**Contact:**

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### 3. Joint Letter to Washington Fish and Wildlife Commission (December 10, 2020)

December 10, 2020  
Fish and Wildlife Commission  
Washington Department of Fish and Wildlife  
600 Capitol Way N. Olympia, WA 98501-1091

Sent via email to: [Commission@dfw.wa.gov](mailto:Commission@dfw.wa.gov)

Dear Commissioners:

RE: Proposed rule changes for winter steelhead sport fishery on Washington Coast

We are a group of conservationists, business owners, and anglers who work, live, and recreate on Washington's coast. Accordingly, we have a vested interest in obtaining fisheries management on Washington's coastal rivers that protects and restores wild steelhead populations to ensure opportunity for this and future generations of anglers, while also honoring the treaty fishing rights of area tribes.

Steelhead are the state fish of Washington and have long been an integral part of the Northwest cultural and economic fabric. And for good reason. Historically, Washington was the epicenter of winter steelhead fishing, with anglers having a literal smorgasbord of famed rivers from which to choose. The Skagit, Sauk, Skykomish, and Stillaguamish Rivers were not only brawny and beautiful, but they also produced enormous fish. The same was true with the EF Lewis River, which produced the state record winter steelhead in 1980, the same year Mt. St. Helens erupted. At the time, the rivers of the coast and Olympic Peninsula were more afterthought than focus. Their remote location required a longer haul. They were very difficult, if not downright dangerous, to float for novice boaters. And frankly, why would someone drive that far when the fishing was so good in their own back yard? The state had a surplus of good wild winter steelhead fishing.

That was the case. It no longer is. The EF Lewis River is a shadow of its former self. Puget Sound's big-five rivers have closed due to ESA-listings. Those orphaned anglers needed a home. With their rivers closed, the drive to Forks and other coastal communities didn't seem quite as foreboding. Couple that with the advent of easy-to-row rafts, technological innovations in fishing, and internet chat boards flush with big steelhead, and you have a recipe for excessive fishing pressure.

Unfortunately, that is where we now stand. Hordes of anglers competing with local tribes for a very limited and declining number of wild steelhead. That is why steelhead anglers and conservation groups, have spent the past decade-and-a-half educating anglers, the general public, and the Commission on the long-term decline of wild steelhead populations in the Queets, Hoh, and Quinault Rivers, and the more recent but steep decline of steelhead in the Quillayute River (Figure 1). The trends that were presented to the Commission during the 2015 WDFW regulation process that led to the elimination of wild steelhead harvest have not changed; the declines have accelerated in most populations. The Department's Region 6 staff did an excellent job explaining the trends and urgent conservation need at a virtual townhall meeting on November 24, 2020. The crux: preseason run forecasts estimate the Queets will be almost 700 fish under its escapement goal of 4,200 fish, while the Hoh and Quinault Rivers will barely exceed their escapement goals. Only the Quillayute River is estimated to be above its escapement goal, by about 3,300 fish.

The declines are now substantial enough to likely warrant an ESA-listing, and if not now, certainly in the very near future if current trends continue. This would be the worst possible outcome, for the fish, the fishers, and a town like Forks that relies heavily on fishing money during the long, wet winters. There isn't a strong track record of de-listing salmonids, and once the fisheries close, they are tough to reopen – as many anglers have experienced in Puget Sound. Given the trajectory of the steelhead populations, the Department is staring down the barrel of a potential ESA-listing for winter steelhead in the Olympic Peninsula and Southwest Washington ESUs unless immediate and substantial action is taken. That is why we fully and wholly support the Department's decision to implement regulations that will put the fish first,

while also providing anglers opportunity to fish in ways that will greatly reduce our impacts and ensure that we do our part to allow enough steelhead to escape the fishery and successfully spawn.

We believe wild steelhead and fishing opportunity will be harmed in the following ways if the Department's proposed fishery plan for the OP is not adopted, including:

1. Reversing course will greatly erode trust with tribes and set back conservation gains the Department has made in recent years for OP steelhead. The co-managers had extensive discussions with tribal co-managers about the upcoming returns of wild steelhead on the OP. Through hard work and collaboration on both sides, co-managers were able to reach agreements this year that include serious concessions that will improve escapement of wild steelhead. We appreciate and thank the tribal co-managers for voluntarily working with the Department, and we thank Region 6 staff and Department leadership for undertaking the very difficult task of trying to meet everyone's interests during a down series of years. A reversal in sport regulations would force Region 6 to renegotiate their fishery plans with co-managers, which would make it very difficult for them to trust the Department and could result in further fishery restrictions, including closure of some rivers.

2. Allowing angling from a floating device will result in a shorter fishing season because of dramatically increased encounter rates. A WDFW study in the Hoh River in 2015 found that boat anglers had a catch-per-unit-effort (CPUE) that was 3-5-times higher than bank anglers (Figure 2). To put the efficiency of boat anglers in context, anglers encountered 1,664 winter steelhead in only two weeks in the month of April in the Hoh River in 2015, of which approximately 90% were caught by boat anglers (Bentley 2017). Based on the pre-season run forecast and fishery management plan (FMP), anglers are allotted a catch and release (CnR) mortality of approximately 150 wild steelhead. Assuming a 10% mortality rate, anglers could encounter 1,500 steelhead before the season would have to close. Given the much higher efficiency of boat anglers, it is clear the length of the fishing season would be much shorter than the currently proposed closure date of March 31.

We believe a longer season using less efficient methods is the best outcome because it keeps anglers coming to OP communities for a longer period of time and because it spreads encounters throughout the run preventing high impacts on fish that arrive early in the season.

3. Reversing the Department's regulations will increase the likelihood of an ESA listing for wild winter steelhead on the OP. An ESA listing would drastically reduce, and perhaps end, sportfishing for wild steelhead on the Olympic Peninsula for an indefinite time period. The current status of wild steelhead makes an ESA listing likely unless immediate conservation actions are taken. As mentioned earlier, most winter steelhead populations on the coast are in long-term decline (Figure 1). Hoh River steelhead have frequently missed their escapement goals for the past fifteen years and many of the lowest run sizes on record have come in the past five to ten years. Further, there is strong evidence that the early-timed component of wild steelhead in the Sol Duc River, which returned from November through early January, have been greatly depleted (Bahls 2004). It took about two years from petition to decision for the listing of steelhead in Puget Sound, so we need to act meaningfully and swiftly to stave-off a listing. Adopting more conservative fishing regulations, such as those proposed by the Department, is the only action with potential to immediately help wild steelhead. Thus, not adopting the Department's proposed regulations will make an ESA listing and lost fishing opportunity in future years more likely.

4. More conservative fishing regulations this year means more fishing opportunity in future years. Even if an ESA listing is avoided, we must increase wild steelhead abundance to meet escapement goals if we are to have fishing opportunity. If we don't adopt the Department's proposed regulations and, instead, maintain the regulations that had been in effect we will jeopardize future fishing opportunity. We believe the Department's proposed regulations are a responsible short-term action, but we also believe it is imperative that the Department begin developing a long-term plan with co-managers that aligns fishing opportunity with a plan to rebuild depleted wild steelhead populations. Such a plan would provide more certainty for anglers, businesses and the tribes

## Conclusion

We believe the evidence supporting the Department's proposed sport fishing regulations on the coast is overwhelming. We appreciate that it is a major undertaking and that the proposal is controversial, but that fact does not diminish the regulations' necessity. Significant changes in the health and abundance of wild steelhead; large public investments in steelhead habitat protection and restoration; the surging popularity of steelhead fishing; the swelling ranks of steelhead guides on the OP; growing support for conservation of wild steelhead among sport anglers of all stripes; and new emerging scientific information regarding what wild steelhead need to thrive are all facts necessitating a robust set of conservation-minded sport fishing regulations.

It bears emphasis that the proposed rules we are supporting are good for both wild steelhead and anglers. Reducing angler impacts, both lethal and sub-lethal, is obviously good for the fish, but what may not be as obvious is that it is good for fishing. Reducing angler impacts will allow for more time on the water and decrease the likelihood that fishing seasons will need to be shortened or eliminated for conservation reasons. Puget Sound rivers provide a stark example of what happens if actions are taken soon enough to avoid an ESA listing and closure of once famous fisheries.

We also want to underscore to the Department and Commission that there is strong support for more conservation-oriented regulations among steelhead anglers. We have attached a report summarizing a public opinion survey commissioned by Trout Unlimited and conducted in 2014 of almost 650 active steelhead anglers. The results show clearly that when steelhead populations are at a conservation concern, a significant majority of anglers favor regulations that protect wild steelhead and their opportunity to fish, even if it limits their methods and opportunity to harvest.

We greatly appreciate the Department's leadership in addressing this difficult issue and relying on the best available science in proposing more conservative fishing regulations for the upcoming season. The Commission made the right decision in 2015 to end wild steelhead harvest. Now we are asking the Commission to renew its commitment to wild steelhead conservation and sustainable fishing opportunity by adopting the Department's proposed rules for the upcoming season.

Thank you for your consideration.

Sincerely,

John McMillan  
Science Director, Wild Steelhead Initiative, Trout Unlimited

Jessica Helsley Washington Director, Wild Salmon Center

Gregory Topf  
Board Chair, Wild Steelhead Coalition

Pete Soverel  
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Cc: Kelly Cunningham, James Losee