

June 6, 2022

Mr. Merrick Burden, Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Re: Agenda Item C.8 – Future Council Meeting Agenda and Workload Planning

Dear Mr. Burden and Council Members,

The Deschutes River Alliance writes these comments to strongly urge the Pacific Fishery Management Council (the “Council”) to take actions to reduce fishery impacts to threatened runs of steelhead by no later than its September 2022 meeting. Specifically, the Council should develop fishery management objectives to limit incidental impacts to steelhead and incorporate those objectives into the Pacific Salmon Fishery Management Plan by a plan amendment. Additionally, the Council should fully restrict any incidental harvest of steelhead in coastal fisheries. These simple actions will provide desperately needed protections for this ESA-listed species and support their recovery.

The Deschutes River Alliance is a science-based advocacy organization seeking collaborative solutions to the threats facing the Wild and Scenic Deschutes River and its tributaries. We advocate for cooler, cleaner water, a healthy ecosystem, and the recovery and protection of robust populations of resident and anadromous fish. Ensuring steelhead are protected during every life history stage, including their ocean residency, is important to achieving our mission.

In light of continually declining and historically low return numbers, steelhead need every layer of additional protection they can get. While steelhead returns have been declining for decades all along the Pacific Coast, the 2021 returns were the lowest on record in many rivers, including the Columbia. This caused the Oregon Department of Fish and Wildlife to institute emergency regulations to support steelhead in many inland waters. With steelhead returns forecasted to be extremely low again in 2022, and with current returns being mere fractions of the 5-year and 10-year averages, emergency regulations remain in place in the Columbia Basin – a difficult sacrifice for many guides, outfitters, and recreators throughout the region.

Every steelhead matters during these unprecedentedly low returns. We all must do our part to protect these declining steelhead populations at every life history stage. We call on the Pacific Fishery Management Council to join in these efforts to support steelhead by acting swiftly to reduce incidental impacts from its regulated fisheries.

First, the Council should begin developing and implementing fishery management objectives to support steelhead in their oceanic life stages. Currently, the Council does not have any management objectives aimed at protecting steelhead – as seen in the most recent Pacific Coast Salmon Fishery Management Plan (FMP). That FMP does, however, contemplate developing and incorporating fishery management objectives for steelhead if situations change. With the lowest steelhead forecasts and returns on records throughout much of the region, the situation for steelhead has indeed changed. As such, these steelhead need the Council to take urgent action to develop and incorporate fishery management objectives for Pacific Coast fisheries.

Second, the Council can further support steelhead by fully restricting their incidental harvest. Under the most recent Pacific Coast Salmon FMP, incidental harvest is not currently restricted. However, like with new fishery management objectives, the FMP anticipates potential future restrictions on incidental harvest. According to the Plan, existing federal regulations already allow for new incidental harvest restrictions for steelhead to be implemented. Instituting these restrictions would help ensure that more steelhead are able to survive and return to their spawning grounds.

The Pacific Fishery Management Council should urgently consider and implement these two readily available actions to support the Pacific Coast's struggling steelhead populations by no later than its September 2022 meeting. Steelhead need each of these additional protections now more than ever. We ask that the Council join with inland fisheries and do its part to help protect steelhead during all of its life history stages.

Sincerely,

Ben Kirsch
Staff Attorney
Deschutes River Alliance
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