



December 6, 2018

NMFS Sustainable Fisheries Division
1201 NE Lloyd Boulevard, Suite 1100
Portland, OR 97232

Submitted electronically to: IdahoSteelheadFisheriesPlan.wcr@noaa.gov

RE: Idaho's Snake River Steelhead Fisheries Plan

Yellowstone to Uintas Connection is a 501c3 organization working to restore habitat in Idaho, Utah, Wyoming and the Regionally Significant Wildlife Corridor connecting the Greater Yellowstone Ecosystem to the Uinta Mountains and Southern Rockies.

Thank you for the opportunity to review and comment on the Idaho Department of Fish and Game's (IDFG) Snake River Steelhead Fisheries Plan (Steelhead Plan) and provide your agency with our comments. Idaho's Steelhead Plan forms the basis for Idaho's Snake River (SR) system steelhead seasons which target hatchery steelhead.

As IDFG states throughout the Steelhead Plan, "Abundance, survival and productivity of SR steelhead populations have declined since FCRPS [Federal Columbia River Power System] development in the 1970's"¹ and that "population dynamics of SR steelhead are driven primarily by out-of-basin factors, especially the FCRPS [Federal Columbia River Power System]..."²

IDFG also notes, the "smolt-to-adult" returns of Idaho's wild SR steelhead or the rate that young SR steelhead successfully migrate to the ocean and return to Idaho as adults, only averages 1.6%.³ This low rate of return accounts for the precipitous population declines in both wild and hatchery SR steelhead. Significant effort has been put forth in the state of Idaho to protect and improve key SR steelhead spawning and rearing habitat however most of these areas remain vacant with no fish returning to spawn.

Idaho's steelhead fishing outfitters are a key component to promote education regarding the magnificence of the wild and hatchery steelhead, the elevation which they climb, the miles which they travel and the obstacles that they overcome to return to Idaho and the Snake River system. Idaho's steelhead fishing outfitters help to instill in the public a deep respect for and desire to support conservation efforts for the SR steelhead fishery. Eliminating a generation of steelhead fisherman by

¹ Idaho Department of Fish and Game, Snake River Steelhead Fisheries Plan. 2010/2018 at Page 19.

² Ibid., Page 19.

³ Ibid., Page 19

eliminating the opportunity to fish for the SR steelhead could have detrimental effects on future conservation efforts concerning the SR system steelhead.

Idaho outfitters have taken many steps, such as, guide and client education, acquiring more fish friendly gear and through the use of landing and handling techniques that minimize harm to incidentally caught wild steelhead. While Idaho anglers targeting hatchery fish do incidentally catch wild fish and this does result in the death of approximately 3.2% of returning adult wild SR steelhead,⁴ this incidental mortality is minor in comparison to the lethality of the federally operated dams downstream. 98.6% of Idaho's SR steelhead die from causes downstream. Of the 1.6% that return to Idaho, 3.2% of these may die from incidental interactions with anglers. The harm caused by Idaho anglers does not compare to the catastrophic mortality inflicted on the fish as they migrate to and from the Pacific. Reservoirs full of warm water, travelling over and through 8 federally operated dams and water quality issues from Columbia River Gorge industry have far more negative effect on the SR steelhead than do Idaho anglers.

Many of the Idaho outfitters are willing to implement additional closures where wild steelhead congregate, implement additional tackle and bait restrictions to safeguard wild steelhead and outlaw wild steelhead removal from the water in hopes to appeal to their claim of wanting to protect fish. This would be in addition to the thousands of miles of river already closed to fishing for wild steelhead in Idaho. Idaho implemented their catch and release policies long before Washington and Oregon and has been a leader in wild fish conservation.

The economic effect on rural Idaho communities from closing this steelhead season early and potentially not opening future steelhead seasons must also be considered. With downstream impacts, especially downstream federally operated dams, killing the vast number of Idaho's wild steelhead, we hope that the Idaho families whose livelihoods depend on Idaho anglers won't be an incidental mortality as well.

Idaho's SR steelhead need sound management and NOAA needs to ensure that wild SR steelhead are not imperiled by the incidental mortality caused during the hatchery steelhead fishing season. Nobody in Idaho will benefit from a poorly developed permit ripe for legal challenge and/or harmful to our precious wild steelhead. So, we ask you to please do a thorough job. However, we also urge you to please do it quickly.

Respectfully,

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