



**Wild Steelhead Coalition  
Major Rules Proposal WDFW Rules Recommendations**

*Addendum: The WSC opposes any directed or increased harvest on wild steelhead anywhere in the state until WDFW develops a comprehensive conservation based management plan for wild steelhead and their recovery.*

**#1 Selective Gear Rules, Proposal 2  
Support**

**#4 Definition of a Hatchery Steelhead  
Support**

**#6 Fishing Tournaments, Proposal 2  
No contest targeting wild steelhead**

**#8 Removing Salmon, Steelhead, and Dolly Varden from the Water  
Support**

**#9 Drop the Annual Limit for Hatchery Steelhead  
Oppose;** The WSC believes that 30 fish limit is sufficient. Furthermore if hatchery fish are deemed to be in surplus numbers we recommend that hatchery releases should be reduced.

**#36 Cedar River Fishery  
Oppose;** WDFW should wait until more information is available about the role of resident rainbow trout in the health of the Cedar River's wild steelhead population.

**#39 Lake Washington Tributaries Juvenile Fishery  
Oppose;** Due to impacts on resident rainbow trout for the same reasons stated in #36

**#41 Skykomish River C&R Fishery  
Support**

**#42 NF Stillaguamish C&R Season  
Support**

**#49 Coweeman River Steelhead Season**

**Oppose:** Our understanding is this proposal has been withdrawn upon recommendation of Region Biologist, because river is not meeting its wild steelhead escapement.

**#51 Elochoman River Steelhead Fishery**

**Oppose:** Our understanding is this proposal has been withdrawn upon recommendation of Region Biologist, because river is not meeting its wild steelhead escapement.

**#52 Gobar Creek C&R Fishery**

**Oppose:** Recommend this be closed. Gobar Creek is a small steelhead spawning tributary in which its smolts and resident rainbow trout should be protected.

**#53 Grays River Hatchery Spring Chinook Salmon Fishery.**

**Oppose:** This fishery in May is during a period of historical adult wild winter steelhead passage. The season you are proposing will not only take some unknown number of adult steelhead that would otherwise be protected, but it will also take an unknown number of downstream migrating salmon and steelhead smolts. Also according to the Region Biologist the river is not meeting its wild steelhead escapement goals.

**#54 Grays River Steelhead Fishery**

**Oppose:** Our understanding is this proposal has been withdrawn upon recommendation of Region Biologist, because river is not meeting its wild steelhead escapement.

**#55 Green River, Proposal 3**

**Support**

**#56 Kalama River C&R Fisheries**

**Support**

**#57 EF Lewis River Hatchery Steelhead Fishery**

**Oppose:** Our understanding is this proposal has been withdrawn upon recommendation of Region Biologist, because river is not meeting its wild steelhead escapement.

**#58 Skate Creek Adipose-Clipped Rainbow**

**Support with amendment:** Implement of selective gear rules

**#59 Tilton River Adipose-Clipped Rainbow**

**Support with amendment:** Implement of selective gear rules

**#60 Wind River Steelhead Fishery**

**Support with Caution: Amendment** under the following conditions: That any fishery that occurs will be catch and release only, selective gear rules. The fishery will be permitted by emergency regulation only after trap and snorkel surveys positively indicate that escapement levels have been met and there are adequate reserves of adult fish to insure the mortality associated with the “hook and release” fishery will not depress adult

steelhead populations below escapement levels. We also urge the WDFW to begin the fishery after the Labor Day holiday weekend.

**#61 Washougal River, Proposal 1**

**Oppose:** Our understanding is this proposal has been withdrawn upon recommendation of Region Biologist, because river is not meeting its wild steelhead escapement.

**#68 Nisqually and Puyallup Watershed Steelhead and Char Protection**

Recommend closing season entirely to give the severely depleted wild steelhead population every opportunity to rebound.

**#69 Dosewallips River Season**

**Support**

**#70 Duckabush River Season**

**Support**

**#71 Hamma Hamma River Season**

**Support**

**#72 Increased Daily Limit for Hatchery Steelhead in Coastal Rivers**

**Oppose;** WDFW should plant fewer smolts if some hatchery programs are producing more fish than needed for sport and tribal fisheries.

An increase in the hatchery fish limit on these rivers will increase the daily fishing effort in both number of individuals and time fished per individual. This will result in a higher catch of wild fish, some which will be taken and some which will die from C and R mortality.

The wild fish in the period of these fisheries (generally December and January) are already depleted from the mixed stock fishery and this action will further add to their problems. The following is an excerpt from the WSC draft report on the Condition of Wild Steelhead in Western Washington:

"One documented example of lost population diversity in Washington is the depletion of the early winter wild runs (December and January) to the Quillayute and other Olympic Peninsula rivers. Fisheries plans have regulated wild winter stock fisheries throughout western Washington, since the advent MSH models and of successful hatcheries for a number based abundance (total annual escapement goal) without due consideration for the seasonal components of the run.

An independent report (McLachlan, 1994) and a report by WDFW staff to the Washington Fish and Wildlife (1996) both concluded that there has been a significant reduction of the historical December and January runs of wild winter steelhead to the Quillayute River system. WDG Game Bulletins from the 1950's, the last decade before hatchery fish became abundant, show the sport catch to be high and often peaking during

January with December the second best fishing month (WDG, 1956, 1957). These records show similar early abundances for many of the other western Washington rivers.

The full run timing is not complete from these past records as some rivers were closed to sport fishing during April and catch does not always depict time of river entry. However, enough rivers were open and enough consistency in the records exists to ascertain that the early runs were a large component of the total runs. Considerable anecdotal information amongst Olympic Peninsula residents that have fished these rivers for over 60 years also attest to the once large early winter runs as well as more abundant summer fish (Goin, 1996, 2004, Price, 2005, others).

Intense sport and tribal fisheries, beginning in the mid-1960's (the origin of large hatchery runs), targeting hatchery fish during the months of late November, December, and January resulted in a mixed stock fishery on hatchery and early wild fish. It has long been understood that fishing at a high yield for the larger, or more productive run, will result in depletion or extermination of the smaller or less productive stock (Ricker, 1958). In the case of the early Olympic Peninsula runs, the hatchery fish were far more abundant than the wild fish and fewer numbers were needed as brood stock. Harvest on both stocks at the rate allowable for hatchery fish depleted the early winter wild steelhead runs.

This scenario of depleted early winter runs has been played out on most western Washington rivers as most of those rivers have been subjected to similar hatchery practices and harvest management planning. Some of the major rivers, in addition to those in the Quillayute system (the Quillayute, Dickey, Sol Cuck, Bogachiel and the Calawah Rivers) that had strong early runs in the 1950's include the Chehalis, Cowlitz, Elwha, Green, Hoh, Humptulips, Lewis, Naselle, Puyallup, Queets, Quinault, Satsop, Sauk, Skokomish, Skykomish, Snohomish, Snoqualmie, Stillaguamish, Toutle, Wenatchee, and Yakima (WDG Bulletins, 1956, 1957). The multiple winter runs, if restored, will improve the genetic diversity, life history diversity, time distribution, productivity and abundance of these early runs and enhance wild steelhead resiliency to unfavorable environmental events and low productive periods".

**#73 Upper Dickey River Steelhead Protection  
Support**

**#74 Harvest of Stray Hatchery Steelhead in Bear, Middle and South Fork Nemah  
and Palix Rivers  
Support**

**#75 Williams Creek Harvest of Stray Hatchery Steelhead  
Support**

**#76 Naselle River, Proposals 2, 3  
Part 2-Oppose, Part 3-Support**

**#77 SF Naselle River Harvest of Stray Hatchery Steelhead Support**

**#78 Salmon Creek Harvest of Stray Hatchery Steelhead Support**

**#79 North River Harvest of Stray Hatchery Steelhead Support**

**#81 Upper Willapa River Harvest of Stray Hatchery Steelhead Support**

**#82 SF Willapa River Support**

**#83 Cedar River (Pacific County) Support**

**#84 Chehalis River Wild Steelhead Retention**

**Oppose;** Instead of a kill fishery, if meeting escapement goals, extend the season to C&R/Selective gear rules and create extended angler opportunity.

**#85 Humptulips River Wild Steelhead Retention**

**Oppose;** Instead of a kill fishery, if meeting escapement goals, extend the season to C&R/Selective gear rules and create extended angler opportunity.

**#86 Wynoochee River Wild Steelhead Retention**

**Oppose;** Instead of a kill fishery, if meeting escapement goals, extend the season to C&R/Selective gear rules and create longer angler opportunity

**#87 Wynoochee River Selective Gear Rules**

**Oppose;** Current regulation allows for steelhead refuge and provides diverse angler opportunity on an already overcrowded river.

**Importance of Resident Rainbow Trout Populations in Steelhead Recovery:**

We have lost and continue to lose considerable production and diversity of steelhead/rainbow trout, parr and smolts by fishing on these forms. Even where the minimum size is 14 inches, anglers using bait and lures and barbed hooks cause a high hooking mortality. One review of hooking mortality of trout found fish caught by bait (the preferred gear in Washington) suffer over 30% mortality.

A growing body of literature and observations now shows us that sympatric rainbow trout males and precocious steelhead parr males are an important component of the anadromous steelhead spawning population. The literature indicates that up to 50% of the spawning interactions of the anadromous steelhead contain these freshwater forms. Genetic studies also are showing that the two forms (rainbow trout and wild steelhead)

are genetically indistinguishable; indicating that mating between the two forms is common. This is not surprising as research on the Atlantic Coast shows that Brown Trout and Atlantic Salmon are sympatric with their alternate life history form and commonly interbreed.

Resident rainbow trout have also been shown to produce anadromous smolts during favorable times and this function helps to maintain steelhead populations and will aid in recovery of depleted stocks. The depletion of rainbow trout in most Washington rivers must be realized as one of many reasons that wild steelhead have become depleted in most of our rivers. Clearly this interaction is an evolutionary trait of the species (*O. mykiss*) that helps secure its abundance and productivity during environmental conditions not favorable for steelhead survival.

**Note to WDFW:**

"In way of general information the season that now exist on most SW Washington streams in Region #5 were developed through much effort by several local groups working with the Department over a number of years. We have been told that WDFW did no consultation with any of these groups before they developed these proposals, and this is unfortunate.

In general, we will oppose any liberalization of the present seasons until there is a dialog between local fishing and conservation groups and the Department, the basis of which must be positive population trends over several years.

As far as exact opening and closing dates, we believe standardization is more important than maximizing opportunity by a few days one way or the other.

Adopted  
WSC BOD  
11/5/05