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Submitted electronically to: IdahoSteelheadFisheriesPlan.wcr@noaa.gov

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RE: Idaho's Snake River Steelhead Fisheries Plan

Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air, wildlands and wildlife—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in restoring Idaho's wild salmon and steelhead runs.

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) steelhead seasons which target hatchery steelhead.

As IDFG underscores throughout its 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

Indeed, as IDFG notes, the "smolt-to-adult" returns of Idaho's wild SR steelhead — that is to say, the rate that young Idaho fish 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. Idaho has made significant efforts to protect and improve key steelhead spawning and rearing habitat within Idaho. Alas, most of this habitat sits vacant — with no fish returning to use it.

Idaho outfitters have taken steps, such as, guide and client education, acquiring more fish friendly gear and through landing and handling techniques to minimize harm to incidentally caught wild fish. While Idaho anglers targeting hatchery fish do incidentally catch wild fish and

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

this does result in the death of approximately 3.2% of returning adult wild SR steelhead,⁴ this incidental mortality is puny in comparison to the lethality of the federal 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.

Numbers make these statistics a little more real.

Assume that 1,000,000 juvenile fish swim out of Idaho, only 16,000 survive and return to Idaho.

This means that downstream perils kill 984,000 wild Idaho SR steelhead. In contrast, Idaho anglers may cause the death of 512 wild Idaho SR steelhead.

While the loss of any wild Idaho steelhead is a terrible thing, the harm caused by Idaho anglers does not seem to compare to the catastrophic mortality inflicted on our fish as they migrate to and from the Pacific — with no current to push them to the sea, through slack water reservoirs full of warm water, over and through 8 federal dams. Killing 984,000 steelhead hardly compares to 512.

It has recently come to light that IDFG lacked the necessary 'incidental take permit' from NOAA to lawfully allow for a hatchery steelhead fishery. IDFG applied for the permit. NOAA never processed it. Citizen groups pointed out the omission. As a result, IDFG is closing the steelhead season early — and future seasons are in doubt as IDFG awaits NOAA processing the application. While finger pointing and blame abound, one thing is clear: Idaho anglers, and the many family run businesses that depend on them, are reeling from the closures.

Idaho's steelhead need sound management and NOAA needs to ensure that our wild 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, by all means, we ask you to please do a good job here. That said, we also urge you to please do it quickly.

With downstream impacts, especially the downstream dams, killing the vast, 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.

Please do not hesitate to contact me if you have any questions about our letter, or if I can be of any service.

Sincerely,



Justin Hayes
Program Director

⁴ Ibid., Page 15