February 7, 2017

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

Re: Status and trends for Olympic Peninsula wild winter steelhead populations

Dear Members of the Fish and Wildlife Commission:

Trout Unlimited (TU) and the Wild Salmon Center (WSC) are writing to update you on our recent meeting with Washington Department of Fish and Wildlife (WDFW) regarding the status and trends of winter steelhead populations on the west side of the Olympic Peninsula (OP). Our meeting was prompted by some apparent disagreement between our organizations and WDFW on the status of wild steelhead populations on the OP.

Our analysis of the available data has led TU and WSC to conclude that most wild winter steelhead populations on the OP are in long-term decline, and if the trends continue, there is increased risk of further fisheries restrictions and, in the worst-case scenario, the eventual listing under the Endangered Species Act. Indeed, declining wild steelhead runs and increasing angling pressure on OP rivers are the main reasons we supported changes in sport fishing regulations, which were unanimously approved by the Commission, to reduce angler impacts on wild steelhead. The recognized need to protect wild steelhead on OP rivers is also the reason that WDFW has changed management of its fisheries on these rivers to reduce impacts on wild steelhead over the last two decades.

At a Commission meeting last December you voiced concern that our groups and WDFW appeared to disagree about the state of the OP's wild steelhead and suggested that we meet to attempt to come to agreement on what the data indicate about these steelhead runs. We are pleased to report that we have done that with success. After reviewing the data and analyses our organizations and WDFW reached agreement on the following aspects of the status of OP steelhead.

First, we agreed that statistical analyses indicate that wild winter steelhead populations in the Hoh and Queets Rivers have trended downward since 1980. The average annual run sizes of steelhead returning to the Hoh and Queets in recent years have declined by 33% and 48% respectively compared to numbers observed in the early 1980s. Our initial disagreement stemmed from a focus on different time periods for analysis and interpretation. TU and WSC focused on the overall trajectory of the populations as shown by the 35-year time series and therefore highlighted the decline in numbers over this longer time frame. WDFW focused on the recent 10 to 20 years of the time series that corresponded to fishery changes on these rivers and therefore highlighted the potential that these changes have helped slow the decline in steelhead numbers in recent years. With further discussion at our meeting, we agreed that the populations have declined in the long term and that there are inherent risks to interpreting recent short-term trends without considering the context of the long term declines.

Second, we agreed that winter steelhead in the Quillayute system exhibited a fundamentally different pattern of abundance from the Hoh or Queets rivers. Annual run size in the Quillayute system trended upwards from the late 1970s to the mid-1990s and then downwards since the mid-1990s. Recent run size has been as low or lower in some years than those observed in the late-1970s and early-1980s. In fact, the escapement for the Bogachiel River last year was the lowest on record (escapement of < 800 steelhead). Based on these observations, we agreed that wild winter steelhead on the Quillayute River have declined over the last 20 years, which is reason to closely monitor this population and its fisheries.

Third, WDFW provided data on ocean survival of steelhead. The ocean survival data are based largely on returns of OP hatchery steelhead, and we agreed that these data were the best available surrogate to understand trends in ocean survival of wild steelhead. The data show that ocean survival has been fairly consistent over the period of record, except for a period from the mid-1980s to mid-1990s when ocean survival declined slightly before increasing to prior levels. These data indicate that the decline of OP wild steelhead is probably not due to changes in ocean survival and is more likely to be related to the conditions in freshwater.

Given the status and trends of OP steelhead, and our mutual concerns over their future, we also discussed the potential for a collaborative modeling effort to further examine watershed capacity and explore reasons for the low numbers of wild winter steelhead currently returning to OP rivers. The models currently used to inform management of winter steelhead in OP rivers were developed in the early 1980s and reflect the state-of-knowledge at that time. Over the past 30 years, there have been considerable advances in life-cycle models, our knowledge of steelhead ecology, and data available for analysis. In light of this progress, we agreed to work with WDFW to examine life-cycle models that may more accurately reflect the potential of OP

watersheds to produce steelhead and to explore reasons for the observed declines. We reaffirmed our joint commitment to research being conducted by the Hoh River Steelhead Project that will provide additional information on steelhead life history diversity to help inform new analyses. We also discussed that any new analyses suggesting changes to escapement goals used for fish management would need to be thoroughly vetted and reviewed by WDFW; and that the authority to modify escapement goals rests solely with WDFW and the treaty tribes.

We greatly appreciate WDFW's cooperation and willingness to meet and discuss this important matter. Our meeting highlighted our mutual interest, concern, and desire to seek solutions. TU and WSC look forward to working with WDFW and the Commission to ensure the west-side of the OP remains one of the great wild winter steelhead fisheries in the Lower-48.

Sincerely,

John McMillan, Science Director, Trout Unlimited's Wild Steelhead Initiative

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Matthew Sloat, Science Director, Wild Salmon Center

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