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Department of Environmental Conservation

Salmon River Fisheries Management Plan

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Preface - New York's Salmon River is a unique and world famous fishery. It is one of the most highly used fisheries resources in the State, visited by anglers from across the country and around the globe who seek to catch the trophy-sized trout and salmon that run from Lake Ontario. As with any valuable resource, a guiding document is needed to ensure that it is protected, cared for and whenever possible, improved upon. This fisheries management plan satisfies that need and also provides a platform for evaluation and continual improvement toward meeting the objectives established for this premier fishery.

Acknowledgements – The Authors would like to thank the members of the Salmon River Fisheries Management Focus Group who spent many hours reviewing the first draft of this plan and who gave up their time to work with DEC during the peak of the salmon run to develop a Fisheries Management Plan that will provide stewardship of this resource and guide our management actions for the next 15 years. The Focus Group was comprised of a diverse group of anglers, local business representatives and guides who share a passion for the Salmon River fishery and included:

Rob Adamski	John Kopy
Dave Agness	Rob Ripka
Garrett Brancy	Jim Rood
Jason Gawarecki	Ken Ruszkiewicz
Walt Geryk	Mark Sabia
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SALMON RIVER FISHERIES MANAGEMENT PLAN

Introduction

In 1994 the NYS Department of Environmental Conservation (DEC) accepted the "Fisheries Enhancement Plan for the Salmon River, New York, A Tributary to Lake Ontario," prepared by the United States Fish and Wildlife Service (Kozuchowski et al, 1994). The 1994 plan established fisheries management goals and objectives for the Salmon River watershed and was broken down into three distinct reaches: [1] the main stem Salmon River and its tributaries below the Lighthouse Hill Reservoir; [2] Lighthouse Hill and the Salmon River Reservoirs and the main stem of the river between them; and [3] the headwaters. Since the 1994 Enhancement Plan was adopted, many of its goals and objectives were achieved.

Salmon River flows have been altered since the early 1900s by the construction and operation of two hydroelectric dams. For decades river flows were regulated to maximize power production revenue, resulting in daily flow fluctuations ranging from negligible flow up to 2,000 cubic feet per second (cfs). In the 1990s, significant changes in both daily and seasonal water release protocols were negotiated between the hydroelectric utility (Niagara Mohawk), DEC, U.S. Fish and Wildlife Service, and other interested parties, as part of the Federal Energy Regulatory Commission (FERC) hydropower licensing process.

The FERC license established seasonal minimum or "base" flow requirements of 185 cfs from May 1st – August 31st, 335 cfs from September 1st – December 31st, and 285 cfs from January 1st – April 30th. These negotiated base flows, which went into effect in 1996, were selected to ensure suitable habitat for year-round survival of indigenous and introduced fish species and to enhance year-round recreational fisheries. In addition to base flow requirements, any daily flow modifications are now implemented incrementally (ramped) and generally occur during the night or early morning hours when anglers are not on the river. These modifications were implemented to protect anglers and other river users, and enhance the fishery (aquatic habitat) downstream of the lowermost reservoir/power plant (Lighthouse Hill).

The new flow regime resulted in significant improvements to the river's aquatic ecosystem as well as the fishing opportunities it supports. The trout and salmon fisheries of the Salmon River have generally flourished since the changes went into effect. The Salmon River has supported sportfishing effort exceeding one million angler hours, surpassing the open-lake boat angler effort in some years. This tremendous angler effort, which occurs in a relatively short length of river, presents several significant fisheries management and social challenges.

Purpose and Scope

For the period 2018-2033, this fisheries management plan (Plan) will guide efforts and resources toward enhancing the Salmon River's status as New York State's premier, year-round angling destination for lake-run trout and salmon (salmonids). The Plan will serve as the basis for the development of annual work plans to implement actions toward meeting fisheries management objectives. Having such plans keeps the angling public informed of the DEC's efforts and

provides a platform for adaptive management and continual improvement. Annual "State of the Salmon River" meetings will be held in early spring beginning in 2019. These meetings are intended to provide the angling public an update on the status of projects, studies and initiatives that were undertaken during the previous year and to go over what is planned for the upcoming year. In turn, anglers will have the opportunity to ask questions and provide suggestions regarding issues they feel the Department should focus on.

This Plan is guided by the *Fish Community Objectives for Lake Ontario* (Stewart et al. 2013) and was developed in close consultation with a variety of Salmon River stakeholders. It focuses exclusively on anadromous salmonids in the 17 miles of main stem Salmon River and its major tributaries (hereafter referred to as the River) below the Lighthouse Hill Reservoir. While wild salmonids are considered important elements of the River's sport fisheries, and management strategies will include efforts to maintain and improve wild fish production and enhance native fish restoration, sport fisheries in the main river will be managed primarily with stocked fish.

Stakeholder representation included a wide variety of interests including local business owners, spinning and fly fishers, bait anglers, river guides, and organized angling groups with a diverse species interest, which included Chinook and coho salmon, steelhead, Atlantic salmon, and brown trout. The draft plan was posted for public review in the Environmental Notice Bulletin on March 21, 2018. Comments received during the 30-day public comment period were grouped by general theme for response. DEC responses, by theme, are presented in Appendix A. Specific comments received are provided in Appendix B.

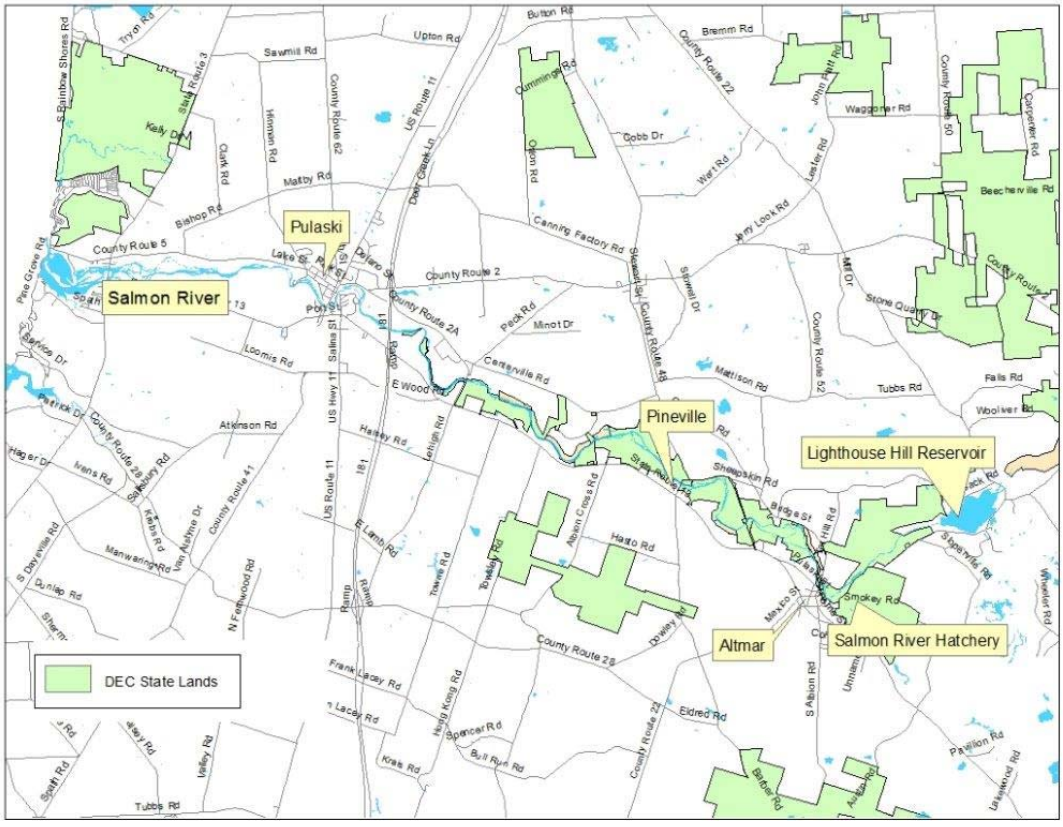

Figure 1. Map of Salmon River from Lake Ontario to Lighthouse Hill Reservoir

Current Fisheries

The River supports year-round sportfishing opportunities and qualities that are rare, if not unique, in the continental United States. This world class fishery not only offers salmonid angling opportunities almost every month of the year, but also affords the potential to catch trophy or even record-sized fish. Like the diversity of the River's lake run salmonids, the desires of anglers frequenting the River also vary greatly.

Public access to the River is unique as well. In total, DEC currently provides permanent angler access on one or both banks of approximately 14 miles of the river. Most of the remaining sections of river where DEC does not have public fishing access are owned and managed by businesses or individuals that charge anglers a fee to access the river.

The River experiences a tremendous amount of fishing effort, typically ranking in the top five of waters statewide in total annual effort. From Sept. 1, 2011 through May 15, 2012 estimated angler effort exceeded a million hours which surpassed the Lake Ontario New York boat fishing effort during the 2011 season. DEC has regularly monitored angler effort and catch on the river and more summary information about the data collected can be found in a report by Prindle and Bishop (2017).

The following sections provide more specific information on the fisheries from a seasonal perspective.

Fall

The greatest angling effort occurs in fall with the Chinook salmon spawning run, drawing large numbers of anglers who are largely focused on harvesting fish. The coho salmon run also occurs in fall, but it is smaller in comparison and these fish ascend the River more rapidly than Chinooks. Small numbers of Washington strain steelhead also enter the River in fall, however, most ascend the River in late fall/winter (see "Winter/Spring" section). Atlantic salmon, brown trout, and Skamania strain steelhead are less frequently caught in the fall, but trophy-sized fish are not uncommon. The chances of catching these three species are greater in the summer and early fall (see "Summer" section).

The following provides more specific information by species.

Chinook Salmon

The Chinook fishery is supported by a combination of wild and stocked fish. The annual Chinook salmon stocking target for the Salmon River system is 352,000 fish. A portion of these fish are stocked just below the Salmon River Hatchery (Hatchery) in Beaverdam Brook, while the remainder are stocked into the lower River at the NYS Route 3 bridge. Additionally, while numbers vary from year to year, millions of wild Chinook smolts are produced annually as a result of natural reproduction in the River. In one study, Everitt (2006)

estimated that well over 5 million wild Chinook salmon parr were produced in the River in a single year. A tagging study conducted by DEC from 2008 - 2011 revealed that approximately 58% of the Chinooks in the fall spawning run are wild fish. Despite this significant wild contribution to the River fishery, only about 12% of Chinook salmon entering the Hatchery's fish ladder are wild fish. Consequently, current Chinook stocking numbers in the River must be maintained to support the River's fall Chinook salmon fishery, and to ensure that enough adults return to the Hatchery to meet NY lake-wide Chinook stocking targets.

Adult Chinook salmon returning from Lake Ontario generally begin to enter the River in late August. Adult returns typically increase throughout September, generally peaking with heightened spawning activity during the first two weeks of October. Some fish remain in the river into November, but the run and associated spawning activity is generally completed by mid-October. Both Chinook and coho salmon die after spawning.

Salmon River angler demographics during the fall salmon fishery differ somewhat from those of the remainder of the year. Out-of-state anglers comprise 65% of the total during the fall fishery, compared to 54% during the winter and spring fishery (Prindle and Bishop, 2017). Angling effort during the fall fishery is predominantly shore based, with boat angling only accounting for a small percentage of the effort. The roughly 2.5-month-long Chinook salmon season generally accounts for half of the annual fishing effort at the River.

Coho Salmon

Approximately 90,000 yearling coho salmon are stocked annually from the Hatchery directly into Beaverdam Brook. Adult coho salmon generally return to the River during the same time period as Chinooks. Hatchery stocked coho comprise nearly the entire run of adults to the Hatchery because the River does not, in general, provide summer temperatures necessary for survival of wild juveniles. Unlike Chinook salmon that migrate to the Lake within months of hatching, young cohos require a year in the river before migrating (see "Fishery Management Challenges" below).

The coho spawning run is smaller in size and duration than the Chinook run but provides a significant complimentary fishery. In addition to lower stocking numbers, fish migrate upstream very quickly, typically overnight, and this rapid ascent means that any given individual is only available to be caught by anglers for a short time.

Winter/Spring

Steelhead Rainbow Trout

The winter/spring fishery predominantly focuses on steelhead rainbow trout (steelhead). Both Washington strain and Skamania strain steelhead are present in the River and its tributaries, with 120,000 and 43,000 yearlings, respectively, stocked annually. Washington strain steelhead are a "winter run" variety, with adults generally initiating migration back to stocking sites/natal streams during late fall/winter. This run continues through the winter, and into early spring when they spawn. Unlike Chinook and coho salmon which die after one spawning, steelhead can spawn several times. Stocked Washington strain steelhead support most of the winter and

spring fishery in the River and its tributaries. Skamania strain steelhead are stocked with the intent of providing a summer run fishery and are described in the next section. Fish returning to the Hatchery provide the eggs and milt for all the steelhead stocked in both lakes Ontario and Erie.

Summer

The River summer fishery offers a surprisingly diverse assemblage of trout and salmon species for anglers to pursue. Skamania steelhead have traditionally been the primary draw of the summer fishery with the highest concentrations being present in early August. However, over the past decade, and particularly since about 2011, the number of Landlocked Atlantic salmon (Atlantics) in the river appears to have increased. Angler catches of Atlantics frequently start during the early summer, immediately following the end of the winter/spring steelhead fishery, and typically increase throughout the summer. Atlantics now appear to be more abundant than Skamania during most summers. The third species that anglers can expect to catch during the summer are non-migratory, stocked domestic brown trout. Further discussion of these species follows.

Steelhead Rainbow Trout

Skamania strain steelhead are considered a "summer run" variety since many individuals migrate into the river during the summer, sometimes nearly a year before they will spawn. The Skamania strain was introduced to the River in the 1980's to create a summer and early fall fishery. While the program was fairly successful for many years, the advent of more stringent fish disease prevention protocols at DEC hatcheries, following an outbreak of Viral Hemorrhagic Septicemia in Lake Ontario in 2006, changed how the Skamania egg-take takes place. Because early run (summer and fall) fish could no longer be sorted and held inside the hatchery due to disease concerns, these fish could not be selectively used during the spring egg-take. Since those changes went into effect, the summer Skamania fishery has declined, with only occasional reports from anglers in recent years. While good numbers still return to the Hatchery each spring, very few return to the river during the summer as intended. The Skamania life history pattern now seems to mirror that of the "winter run" Washington strain steelhead.

Atlantic Salmon

The DEC's Adirondack Hatchery annually rears and stocks 50,000 yearling Atlantic salmon for the Salmon River Additionally, the US Geological Survey (USGS) Tunison Laboratory of Aquatic Sciences (TLAS) has reared and stocked as many as 32,000 Atlantic salmon annually into the Salmon River system in recent years in support of Atlantic salmon restoration. All stockings occur in Beaverdam Brook near the outlet of the Hatchery.

DEC data and observations suggest substantially increased catches of Atlantic salmon in both the Lake and the River over the past decade. Catches of Atlantic salmon during the 2011-2012 Salmon River creel survey increased almost threefold over the previous two surveys, but declined in the most recent survey (2015-16). However, the relatively high number of angler reports of landed Atlantic salmon in the River during the summers of 2016 and 2017 indicate far greater fishing success than seen in several decades.

One of the most promising aspects of increasing adult Atlantic salmon returns to the River is the opportunity to collect eggs and milt (gametes). These fish have successfully survived the unique conditions in Lake Ontario and likely possess the most desirable genetic characteristics for re-establishing a population. The TLAS continues to collect gametes from these returning adults, and rears the resulting offspring to both the fall fingerling and spring yearling stage. In 2016, gametes were collected from 65 returning adults. Another promising sign has been the collection of several wild juvenile Atlantic salmon in the River in recent years. While the intent of this program is to develop a strain of Atlantic salmon capable of supporting a self-sustaining population in Lake Ontario, the Department has no expectation that they will replace the trout and salmon species which currently provide the outstanding fishing opportunities in the lake and its tributaries.

Brown Trout

Lake run brown trout comprise a small part of the River fishery. Currently there is no formal brown trout stocking policy in the river, but surplus fish are stocked, as available, with the goal of providing a summer fishery until a more consistent Atlantic salmon and/or Skamania steelhead fishery develops. Despite the lack of a consistent stocking policy, lake run brown trout are caught each year with catch rates from recent creel surveys ranging from 0.003 to 0.02 brown trout per hour (Prindle and Bishop 2017). The origin of these lake-run brown trout is likely a combination of surplus fish stocked into the River and strays stocked at other Lake Ontario sites. Larger numbers of brown trout have not been stocked in the River due to concerns that they may compete with Atlantic salmon and also potentially interbreed with them. Hybrid wild fry of the two species were collected from the River in 2010 and 2011.

Fishery Management Challenges

The following summarizes issues that represent challenges or impediments to meeting several fisheries management objectives, some of which cannot be overcome. These issues are not presented in priority order.

Summer Water Temperatures

Despite the tremendous improvement in year-round flows resulting from the FERC hydropower relicensing agreement, warm water temperatures during the summer months continue to be problematic for trout and salmon survival. The limited volume of cold water in the reservoirs that feed the River results in extended periods during the summer when temperatures can exceed those necessary to support both adult and juvenile trout and salmon growth and survival. Consequently, wild production of Coho, steelhead, brown trout, and Atlantic salmon in the mainstem has been, and will continue to be, severely limited because juveniles of these species must reside in the River for more than a year before migrating to the Lake. Several tributaries to the river, particularly Trout and Orwell Brooks, do have conditions that allow successful smolting of steelhead and coho. These two tributaries have been described by the GLFC's Sea Lamprey control program staff as the best quality steelhead production waters in the Great Lakes basin but their relatively small size limits their production capacity.

Adult Atlantic salmon and Skamania steelhead returning to the River in summer are also more vulnerable to angling mortality, as these fish will concentrate in limited areas of cooler groundwater intrusion. As summer progresses, water temperatures become more of a factor influencing fish and the fishery. The discharge temperature of the reservoir water in early summer is typically near 60°F, but continues to rise, peaking in late August/early September at approximately 74°F. Diurnal water temperatures fluctuate little in the upper section of the River, but vary more widely with increasing distance downriver from the reservoir. These daily and seasonal temperature differences greatly influence where fish are located within the River over the course of the summer, as well as their vulnerability to angling stress and mortality. Climate change will likely exacerbate this situation.

Angler Access

The Salmon River is the most intensively fished water in New York State, and the DEC is committed to improving access to this unique resource. Public access to the mainstem River is exceptional, however, angler density can be very high in some areas, leading to angler conflicts and less desirable angling experiences. High angler traffic on current trails, and in areas lacking trails, promotes erosion, and potentially unsafe conditions. Adding additional parking areas may spread the problem to new areas and this consideration must be addressed during project planning. Also, universally accessible access sites are limited.

Differing Angling Desires and Social Issues

The diversity of angler desires, in concert with very high angling effort, present significant and sometimes unavoidable challenges. Some anglers are content to fish in crowded conditions, while others are willing to hike to find a little extra room to cast. Likewise, some anglers prefer areas with limited tackle restrictions, while others favor areas with more restrictive regulations such as fly fishing only areas. There is also a need to minimize conflicts between River anglers utilizing boats and those fishing from shore. Expanded public education efforts are needed to address stewardship issues such as angler etiquette, disposal of trash and fishing gear.

Angler Ethics and Law Enforcement

Unethical and illegal angler behavior in the Salmon River system remains a primary complaint expressed by anglers. Despite repeated efforts to limit intentional foul-hooking through terminal tackle restrictions, unethical angling practices persist. An expanded public education effort is needed to inform anglers about effective legal angling techniques. DEC also remains committed to maintaining a scientifically sound but socially reasonable regulatory structure, supported by a strong presence of both uniformed and undercover Environmental Conservation Officers (ECO). A highly visible ECO presence is a strong deterrent to illegal activities.

Salmon River Hatchery Water Supplies

The Salmon River Hatchery serves as the lifeblood for the management of this fishery. Insufficient supplies of high quality water and decades of deferred maintenance limit production capacity at the Hatchery, particularly for steelhead, coho salmon, and the prospects for Atlantic salmon; species requiring at least a year in the hatchery. The

Hatchery's water supply from Lighthouse Hill Reservoir is too warm in summer and too cold in winter, and must be tempered with ample supplies of well-water. Most of the hatchery wells have experienced declining yields from iron bacteria, which form a thick encrustation of iron oxide and biofilms in the wells. These wells need periodic rehabilitation in order to maintain flow. DEC continues to improve the hatchery's infrastructure and explore the most effective options for mitigating the water supply issue.

Survival of Trout and Salmon in Lake Ontario

A significant factor influencing the quality of the River's fisheries is survival of juvenile trout and salmon once they enter Lake Ontario. Survival can vary greatly, both between species in any given year, and for the same species from one year to the next. High stocking numbers and/or wild production one year is not a guarantee of good fishing several years later. A variety of factors such as prey availability, predator abundance, weather, and lamprey abundance, to name a few, influence how many juveniles make it to adulthood. Likewise, angler harvest in the lake also has some influence on fishing quality in the River and other tributaries. DEC will continue efforts to effect positive change on those factors which can be influenced, such as lamprey control, and work with constituency groups to consider the needs of lake and tributary anglers.

Thiamine Deficiency

Thiamine deficiency presents a major fisheries management challenge, affecting both natural reproduction of salmonids and the survival of eggs and fry reared at the Hatchery. Lake Ontario salmonids feed to varying degrees on alewife, an invasive preyfish that contains or produces thiaminase. Thiaminase destroys thiamine (vitamin B1) in alewife predators, and the resulting thiamine deficiency can cause early mortality syndrome (EMS). EMS is a reproductive disorder characterized by low egg thiamine levels due to poor maternal thiamine transfer, and results in high offspring mortality. Occasionally, adult fish can also be affected by severe thiamine deficiency which may result in death prior to spawning, as was the case for steelhead in the fall/winter of 2014.

Potential Threats

Several issues potentially threaten the future of the River's fisheries including climate change, overuse, large-scale water withdrawals from the aquafer, land use changes within the watershed, and the introduction/expansion of invasive species like knotweed, which threatens bank stability and, consequently, fish habitat and water quality.

Management Goal

DEC will manage the River and its tributaries as a premier, high quality, year-round sport fishery with the opportunity to catch a diversity of trophy sized lake run trout and salmon species.

Objectives (Please note the following objectives are not presented in priority order.)

1) Maintain and improve fish culture practices at the Salmon River Hatchery to support high-quality lake-run fisheries.

Strategies

- Produce a diverse array of salmonid species to support a high-quality, year-round lake-run fishery that also satisfies hatchery egg requirements.
- Develop and implement Salmon River Hatchery "Infrastructure Revitalization Plan."
- Continually explore opportunities to integrate science-based, state-of-the-art aquaculture technology and practices, and employ them where appropriate and feasible, to maximize the hatchery's production potential.

2) Improve and expand the existing network of angler access sites on the Salmon River and its tributaries to provide satisfying angling experiences to a diversity of angler interests.

Strategies

- Maintain existing angler parking areas and trails to support safe use.
- Formalize and improve trail access system to and along the River to minimize impacts on sensitive areas.
    - Add additional DEC angler parking areas on DEC properties as per the *Lower Salmon River Restoration and Recreation Enhancement Plan*. (See: https://www.dec.ny.gov/outdoor/113223.html)
- Acquire additional Public Fishing Rights easements and outright ownership whenever willing sellers are identified.
- Explore opportunities to create universally accessible fishing sites along the River.
- Develop and improve outreach tools to inform anglers about fishing opportunities that exist throughout the River.
- Maintain a limited number of areas that are relatively remote to provide a more solitary angling experience.
- Explore opportunities to accommodate a diversity of additional, special angling opportunities.

3) Increase responsible stewardship of the Salmon River system's fisheries resources and promote ethical angling practices.

Strategies

- Post signage to inform anglers on angling opportunities, angling regulations, and encourage ethical angling techniques and behavior.
- Develop and maintain angling regulations and outreach tools that promote ethical angling behavior and responsible stewardship of the River and its fishery resources.
- Provide for high-quality angling experiences through stewardship outreach and law enforcement efforts.
- Strive to alleviate conflicts between anglers.

- Work with local municipalities (Village and County Governments), user groups, conservation organizations and partners to improve overall stewardship of the Salmon River (trash collection, porta-johns, etc.).

4) Maintain and improve high quality habitats to support all life stages of lake run salmonids.

Strategies

- Protect and enhance instream habitat to benefit water quality and all life stages of trout and salmon by completing habitat enhancement and streambank stabilization projects utilizing natural stream design techniques.
- Protect instream habitat and water quality through ensuring compliance with NYS laws and regulations.
- Identify thermal refuge areas and explore opportunities to enhance adult salmonid holding areas which provide refuge during warm summer months.
- Develop measures (regulatory or otherwise) to protect identified thermal refuges during periods of high water temperature.
- Assess the need for additional protection of important spawning tributaries.
- Work with volunteer groups and conservation organizations to improve riparian and instream habitat.
- Monitor changes in watershed land use and seek to minimize adverse impacts on water quality and quantity.

5) Maintain a high-quality Fall sport fishery.

Strategies

- Maintain current Salmon River water flow regime to support wild Chinook production.
- Maintain yearly assessment program for monitoring natural production of juvenile Chinook.
- Maintain Chinook and coho salmon stocking numbers supporting objectives established in *Fish Community Objectives for Lake Ontario*.
- Evaluate the performance of stocked yearling versus fall fingerling coho.

6) Maintain a high-quality Winter/Spring sport fishery.

Strategies

- Monitor wild juvenile steelhead production in Trout and Orwell brooks.
- Explore options to maximize the opportunity to catch wild and trophy-sized steelhead.

7) Improve the quality of the summer sport fishery.

Strategies

- Increase returns of Atlantic salmon to the River by:
    - Developing an Atlantic salmon management plan for Eastern Basin Lake Ontario tributaries, including the Salmon River system.
    - Collaborating with the USGS and US Fish and Wildlife Service to provide supplemental stockings of juvenile fish originating from Lake Ontario stocks.
    - Imprinting federally reared fish on the Salmon River Hatchery by stocking fall fingerlings into the smolt release pond, and releasing as yearlings.
    - Monitoring the production of wild juveniles in the Salmon River system.
    - Evaluating the potential for rearing Atlantic salmon at the Salmon River Hatchery.
- Evaluate the performance of Skamania strain steelhead in providing a viable summer/early fall fishery.
- Stock surplus yearling and 2-year old brown trout to provide a summer fishery until adequate summer runs of Atlantic salmon and/or Skamania steelhead are established.

8) Use science to evaluate the sport fishery quality and inform adaptive management strategies.

Strategies

- Implement an annual fall through spring creel survey to evaluate the fisheries for Pacific salmon and steelhead.
- Evaluate the progress being made toward the improvement of a summer fishery.
- Periodically conduct a summer creel survey to evaluate fisheries for Atlantic salmon, Skamania steelhead, and brown trout.
- Utilize creel survey results to monitor current fishing conditions and inform management decisions.

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Appendix A: Salmon River Fisheries Management Plan Comments by Theme and DEC Responses

Theme

Establish a bait fish hatchery to raise thiamine rich forage for salmonids

Assessment/Response

This is not feasible or practical. A prey fish hatchery could not even begin to produce the number of fish needed to support the salmonid population in the lake. Efforts are underway to try to re-establish some of the native coregonids, which will partially accomplish this goal.

Comment Source Number

12

Theme

Monitor and protect the water quality in the Salmon River watershed. This includes the proposed wind farm project.

Assessment/Response

The Bureau of Fisheries will work with the Division of Water to ensure that the water quality remains adequate to support a healthy aquatic ecosystem. We will monitor the proposed wind farm and advocate for all appropriate protective measure if the project is developed. This topic falls under Objective 4 of the management plan.

Comment Source Number

9, 12, 14, 15, 19, 25, 26

Theme

Hatchery selection of later run (post Nov. 1) fish to aid in returns to WNY streams

Assessment/Response

The run peaks in early October. Waiting until after November 1st to collect eggs is not feasible because most fish have either spawned or died by then.

Comment Source number

1

Theme

Poor tasting fish

Assessment/Response

The taste of the fish is related to their diet and life stage. Fish which prey on alewife typically aren't as palatable as those that consume other forage. The Pacific salmon running the river are at the end of their life and are beginning the process of dying. This likely impacts their taste. There is nothing that can be done to alter either factor. Pacific salmon in Lake Ontario feed almost exclusively on alewife.

Comment Source number

2

Theme

Invasive species prevention and education. Increase cooperation with other agencies regarding invasive species topics.

Assessment/Response

The DEC will continue to work at developing educational material on invasive species in the form of handouts, signage, and web-based content. They are a serious concern on the Salmon River, particularly Japanese Knotweed. We will also work with other agencies to complement each other's efforts in education and outreach. This topic falls under Objective 4 of the management plan.

Comment Source Number

3

Theme

There are significant conflicts between driftboat anglers and shore anglers. There are too many drift boats and all guides should be more closely regulated.

Assessment/Response

This is a valid point that is frequently expressed by shore anglers. Development of a system which limits the number of driftboats on the river will be explored. Given that many of the driftboats on the river are operated by guides, more stringent criteria for issuance of a NYS guides license could help limit the number of boats. This will to be pursued with the Division of Public Protection which manages the guide program. This topic falls under Objective 3 of the management plan.

Comment Source Number

4, 18, 22, 26

Theme

Various proposals for Specific Fishing Regulations were suggested by a number of commenters

Assessment/Response

Specific regulations were intentionally excluded from the plan because we need to go through the formal public rulemaking review process for any regulation that is proposed. Including specific regulation proposals in the plan would be disingenuous to the regulatory process since it would imply it is a "done deal" and the formal public comment period for rulemaking doesn't matter. This topic falls under Objective 8 of the management plan.

Comment Source Number

5, 11, 12, 17, 18, 22, 23, 24, 25, 26

Theme

Fix and open the lower Salmon River Reservoir boat launch to the public

Assessment/Response

This comment is not applicable to the plan. Brookfield Renewable owns the lower reservoir and is responsible for it's management but the DEC will enquire as to their willingness to address this request.

Comment Source Number

10

Theme

Increase public access and improve trails

Assessment/Response

We will work to increase public access on private land as opportunities arise. However, on existing public lands the Department must balance the desire for improved easy access with the desire to maintain some "remote" areas that offer less crowded conditions for those willing to walk some distance. This topic falls under Objective 2 of the management plan.

Comment Source Number

9, 29

Theme

Allow All Terrain Vehicle access on the Lower Salmon River State Forest

Assessment/Response

This topic primarily pertains to the Lower Salmon River State Forest Restoration and Recreation Enhancement Plan. Use of ATV's within the corridor would not be compatible with the angler foot traffic that exists in the river corridor during most of the year.

Comment Source Number

6

Theme

Institute a maximum car limit in parking areas

Assessment/Response

Parking availability is generally limited by the size of each lot. Restrictions aimed at controlling illegal or unwanted offsite parking will require cooperation with local municipalities. This topic falls under Objective 2 of the management plan.

Comment Source Number

18

Theme

Maintain more remote fishing areas

Assessment/Response

This is a strategy identified it the plan and staff will work to strike a balance between providing more "remote" fishing opportunities with improved access for all anglers. This topic falls under Objective 2 in the management plan.

Comment Source Number

18, 29

Theme

Have year-round Porta-Jons.

Assessment/Response

We intend to implement this suggestion. This topic falls under Objective 3 of the management plan.

Comment Source Number

18, 21

Theme

An increase in law enforcement is desired along with more serious penalties.

Assessment/Response

This concern came through loud and clear through the comments. The Bureau of Fisheries will work with the Division of Law Enforcement to address the concerns about a lack of enforcement. However, penalties are not within the DEC's control and need to be addressed by state and/or local officials. This topic falls under Objective 3 of the management plan.

Comment Source Number

4,8,10, 12, 20, 21, 23, 25, 26

Theme

Increase the brown trout fishery in the Salmon River

Assessment/Response

The Department wishes to maintain a focus on enhancing opportunities for anglers to catch Atlantic salmon and are concerned that interbreeding with brown trout could negatively impact the USGS objective of developing a Lake Ontario strain of Atlantic Salmon. Angler reports strongly suggest that returns of Atlantic salmon have increased in recent years and they could provide a truly unique summer fishery. This topic falls under Objective 7 of the management plan.

Comment Source Number

7, 10, 23, 24, 25, 26

Theme

Increase the Atlantic salmon fishery in the Salmon River

Assessment/Response

Efforts are already underway to do so. This topic falls under Objective 7 of the management plan.

Comment Source Number

8, 16, 18, 23, 24, 25, 26

Theme

Atlantic salmon program a waste of time and money

Assessment/Response

Catches in recent years of Atlantic salmon from the Salmon River and elsewhere would indicate that stocked fish are surviving better than in the past. Changes in Lake Ontario's fish community may be responsible and would suggest that the possibility of restoring a fishable population of Atlantic salmon to the river is better now than ever. This topic falls under Objective 7 of the management plan.

Comment Source Number

20

Theme

Need to emphasize the smallmouth bass fishery in the lower river.

Assessment/Response

While we recognize and value the smallmouth fishery that exists in the river, this plan was specifically limited to actions related to trout and salmon management.

Comment Source Number

8

Theme

Re-assess Skamania program to improve returns

Assessment/Response

As noted in the document, hatchery constraints related to disease prevention are believed to be the reason for the apparent decline in summer run Skamania in the river. The physical constraints of the hatchery related to disease prevention will be difficult to overcome but the Department will reassess all potential alternatives before a final decision is made on the Skamania program. This topic falls under Objective 7 of the management plan.

Comment Source Number

18

Theme

Evaluate steelhead natural reproduction using the Mass Marking Trailer

Assessment/Response

Assessing the contribution of wild steelhead to the Lake Ontario fishery, utilizing the "marking trailer", is in our plans. This topic falls under Objective 8 of the management plan.

Comment Source Number

21

Theme

Redistribute steelhead stocking numbers from lower use areas to the Salmon River

Assessment/Response

The Salmon River currently receives 25% of the total stocking of Washington strain steelhead into Lake Ontario. The impact to the fishing quality of other tributaries would likely be greater than any gains that would occur to the Salmon River steelhead fishery. However, if it is determined that steelhead stocking in any particular tributary is not warranted due to poor returns, or questionable public access to the stream, R7 managers will certainly make a case to stock those fish in the Salmon River. This topic falls under Objective 8 of the management plan.

Comment Source Number

22

Theme

The 15-year life of the plan is too long. Need more periodic evaluations and updates.

Assessment/Response

The plan is intended to be a guide and was written to provide opportunities for adaptive management as unforeseen issues arise. Regional staff intend to hold an annual meeting and report card to provide stakeholders an update on accomplishments and to share plans for future work.

Comment Source Number

15, 25, 26

Theme

Would like the plan to prioritize projects and proposals, indicate which challenges are realistic to overcome and provide approximate associated costs.

Assessment/Response

With regard to prioritization, Regional staff would prefer to utilize the feedback we receive from the angling public during the planned annual "State of the River" public meeting, along with input received throughout the year. The value of including specific cost estimates in the plan for every potential project or action is questionable given both the uncertainty regarding which activity can be undertaken and the time frame in which it can realistically be accomplished. Instead, cost estimates will be provided at the annual meeting for those items which we have a realistic opportunity to undertake in the coming year and for those items which the Department and/or stakeholders would like to see accomplished in the short-term. Costs for all other outcomes will be categorized as either "High", "Medium", or "Low" in the yearly Workplan review during the annual meeting.

Comment Source Number

21

Theme

Have an annual State of the Salmon River Public meeting

Assessment/Response

Beginning in February/March 2019, staff intend to hold an annual meeting to provide updates on plan accomplishments and discuss planned activities for the coming year. We anticipate that these meetings will allow for two-way dialogue between stakeholders and the Department which will help formulate the activities for the coming year. This topic falls under Objective 4 of the management plan.

Comment Source Number

18, 22

Theme

Increase angler education in the hopes of promoting increased ethics and regulation compliance.

Assessment/Response

As noted in the plan, improving angler ethics and compliance with regulations through education efforts is an important objective of the Department. This topic falls under Objective 3 of the management plan.

Comment Source Number

21, 25, 26

Theme
Continue habitat restoration/improvement projects

Assessment/Response
Ongoing. This topic falls under Objective 4 of the management plan.

Comment Source Number
25, 26, 29

Theme
Raise the non-Resident license fee

Assessment/Response
This is outside the scope of the management plan. Changes to license fees must come from the NY State Legislature.

Comment Source Number
21

Theme
Institute a Salmon River "Stamp" to provide funds for projects and programs

Assessment/Response
This is outside the scope of the management plan. Changes to license fees must come from the NY State Legislature.

Comment Source Number
21, 25, 26

Theme
Institute a community service penalty for Violators

Assessment/Response
The Department is open to exploring opportunities for implementing this action with local judges.

Comment Source Number
27

Theme
Utilize in-stream habitat improvement structures and trail enhancement/development to increase public safety

Assessment/Response
Any planned improvements will be developed with public safety in mind. This topic falls under Objective 2 of the management plan.

Comment Source Number
28

Theme
Eliminate "Pay to Fish" areas along Salmon River

Assessment/Response
Access to private property for any purpose, including pursuit of fish and game, has been established by the legislature and changes to the rights of landowners is outside the realm of this management plan.

Comment Source Number
29

Theme
Salmon River (Franklin County) Flooding concerns

Assessment/Response
Not applicable to this plan

Comment Source Number
13

Theme
Abandoned gas wells along the Salmon River corridor

Assessment/Response
We will note the wells as a potential albeit unlikely threat to water quality in the plan. Any public safety concerns will be dealt with through outreach and education.

Comment Source Number
13

Appendix B. Draft Salmon River Fisheries Management Plan Comments from Public

1) I have reviewed the Salmon River plan. It would appear time and thought has been invested and now a framework to follow has been created. One thing that should be considered with global warming and increasing water temps, protect late running Chinook Salmon. The taking of Chinook Salmon from the Salmon River should end on November 1st. Strip salmon at the hatchery with November-run fish to help the runs at warm tributary stocking locations such as Sandy Creek, Oak Orchard, Olcott and the Niagara River by delaying the runs in those locations allowing for river temps to drop low enough for safe passage of fish. - Chad Kahler

2) I had fished the Salmon River a couple of times over 30 years ago. Sadly, the fillets were of poor taste. It must be due to the water quality of Lake Ontario. Have others raised this concern? I have tried fillets from other fishermen after that time and quality was the same. It is a shame with Salmon being such a valuable resource. - Magnus Olsen

3) I wanted to comment on the Salmon River Fisheries Management Plan. Thank you for a great public meeting earlier this month. overall, I observed that the language about invasive species in the Salmon River is very minimal (further comments below). I'd love to see more Atlantic salmon efforts as well (perhaps including more outreach programs and funding to schools for the Atlantic salmon in the classroom program at OCM BOCES). Save The River hopes to promote the program within the St Lawrence River Invasive species comments:
a. Increase education and outreach initiatives about invasive species to anglers. Make sure "Don't dump bait" signs are installed and up to date at current and new parking areas (targeting early detection species including rusty crayfish, Asian jumping worm among others). Consider developing a brochure and reporting system or flyer for ED/RR species.
b. Minimize angler disturbance. Perhaps installing boot brush stations to minimize spread of invasive species seeds (PSW, Japanese knotweed etc) through muddy boots. Increase signage to stay on designated trails (minimize erosion), and
c. Boost collaboration on angler surveys to gain meaningful data for partner agencies. It could be a good idea to include dialog in angler questionnaires and distribute brochures (have you caught or seen these species: rusty crayfish, northern snakehead, tench etc.) by collaborating with St Lawrence Eastern Lake Ontario PRISM on early detection species not yet in the Salmon River. - Patricia Shulenburg. NOTE: Patricia works for Save The River, but these are her personal opinions and not the organizations.

4) I have fished the Salmon River for many years. Two problems have been constant; crowds and angler courtesy. These have been compounded of late by the addition of so many more drift boats. Presently it is very difficult, as a shore angler, to fish any of the popular and productive pools in the Altmar area including the Barrel, School House and Wired holes because they are occupied by drift boats whose location make it very difficult for shore anglers. They have the ability to access water that most shore anglers cannot reach so they should be prohibited from fishing some popular pools. I hold a season pass at the DSR. This area provides the best angling

experience on the river because of the limited number of anglers, catch and release practices and overall courtesy of the guests. I would like to see more areas with controlled access and the level of supervision that exists on the DSR. This supervision reduces tremendously snagging and lifting as well as fights over location. I also think it would benefit the overall steel head population if you made the section from Pineville to Altmar catch and release during the spring spawning season. - Don Miller

5) Can we be honest and admit that the fish in the river are not there to eat, but to spawn? With that in mind why doesn't the DEC allow fishermen to hook the salmon with a single 1/2"span hook anywhere and drop the daily limit to just one fish? I think that this compromise would allow more fishermen the enjoyment of playing a fish while keeping the population of fish in the river up. Has this ever been considered? - Sergio Diana

6) Please don't forget that the Salmon River area is also widely used by just as many ATV enthusiasts that live in this area as well as from all over the world, just as fishermen do. While we understand that these areas are environmentally sensitive, please don't shut out use by ATV's. We are a responsible group who brings our own millions in revenue to the area. - Kimberly Randall

7) I fish the Salmon River and its tribs every November with a guide. I especially enjoy fishing for brown trout in the tribs, anything you can do to increase the population of brown trout in this fishery would benefit the economy in this area. I am a member of Trout Unlimited and several members are planning trips to this area chiefly for the brown trout fishery. - John Vatalaro

8) The creation and implementation of the Salmon River Fisheries Management Plan is extremely exciting. Having worked on the Salmon River last year for about 6 months, I was able to gain perspective on the needs of the river and what is most desired by anglers, as well as forming some of my own opinions.

I think an emphasis on invasive species control is very necessary, specifically for Japanese Knotweed, multiflora rose, and Hemlock Wooly Adelgid. While HWA obviously isn't in the area yet, with all the travel that anglers conduct to get to the salmon river it makes the area susceptible to invasive by anthropogenic means, in addition to the Hemlock tree making up a large portion of upper watershed riparian areas. Multiflora rose, although at an early detection rapid response stage right now in the salmon river watershed, must be addressed as if this species gets out of control, it has the ability to seriously impede access to the river for any reason(s). Japanese knotweed must be managed from the headwaters downstream based on the species tendency to establish downstream via fragment travel.

Another aspect of the plan that I enjoyed was the effort to enhance our only native salmonid back into the river in larger numbers, Salmo salar. With climate change creating conditions that are becoming increasingly extreme, we should not rely on Skamania steelhead strain making up the majority of the summer angling experience. As you know, Atlantic Salmon are by far the most high temperature tolerant fish that the salmon river supports regarding Salmonids (brown trout a close 2nd?) My biggest reason for advocating for the reintroduction of this species is to have this species eventually become a much larger portion of the fishery and have it replace the absurdly high numbers of Chinook Salmon, be it wild or stocked. I do not believe that the number of Chinook Salmon that are stocked, reared, and created through natural reproduction is sustainable given the age class structure of Alewives in Lake Ontario. It is my personal belief that we are on the edge of collapse, even given the record number of yearlings collected last year.

One aspect of the plan that I'd like to emphasize is the need for more ECO's on the river, especially during peak Chinook Salmon season when lifting and snagging is much more common. I think placing a higher number of ECO's in the area for a period of a month at strategic locations will disrupt some of the bad behavior observed on the river.
While not mentioned in the report, I think that there should be some emphasis placed on the incredible Smallmouth Bass fishery that the river offers in early summer. Marketing this idea could bring new, warm water fishery anglers to the river in search of a unique experience angling for bass in a large trout stream. - Jordan Bodway Lead Steward, Watercraft Inspection Program - Finger Lakes Region Environmental Field Office, Ganondagan Historic Site New York State Office of Parks, Recreation, & Historic Preservation

9) I am very supportive of your efforts in developing this proposed plan. In particular, I am appreciative of the efforts to increase an improve access along the River and work being done to maintain and improve the Altmar Hatchery.
One item that I do believe that is not being addressed in the proposal is the winter/spring habitat that does not specifically address water quality issues. What monitoring is being done. Of particular concern is potential salinity/conductivity and pollution from road run off on the River as well as breeding tribs like Orwell Brook. - Dave Corr Region 6 CFAB Mohawk Valley Chapter of Trout Unlimited
10) I have lived on this river my whole life and have run a sport shop for 15 years and guided for 17 years and as much as I like to fish for Atlantic salmon I would love to see the state stock a species of fish that would stay in the river all year like brown trout so that the local economy could flourish. Also, fix the lower reservoir boat launch so the public can use it and to raise the fines on snagging and other illegal activities on the river. Our current status of fines are such a joke that no one fears of doing any illegal activity because they only have to pay a small fee. Also, go to a one trout limit would also help. When you talk to anyone on from the state about these subjects all they will tell you is that the Lake Ontario and tributaries are a put in and take fisheries. That might have been in the 80s and 90s but we need to get up to date and save this fishery before we lose it. - William Smith

11) I am writing about a concern I have with the Upper and Lower Fly Fishing Only, Catch and Release sections of the Salmon River in Altmar. As I trust you must surely know, these two very small pieces of water are VERY popular among fly fishermen. So much so that folks are known to arrive at a favorite pool several hours before sunrise to secure their favorite spot. As bad as that approach is, in recent years a fishing technique has evolved that has significantly reduced one's ability to fish these areas: Spey Rods. In these very limited pieces of water it is not unusual to find Spey fishermen making 100 foot casts. Basically, across the whole river and then swinging their flies downriver. In the process of doing so they often "hog" these areas at the expense of single rod fishermen.
A classic example is one that I and a buddy ran into on a weekday in February. We got to the river early and hoped to fish "Old Farts" in the Lower Fly Section. We cannot get around as well as we used to. As a 69 year who has been diagnosed with Multiple Myeloma (a blood cancer), I approached Old Farts with my 73 year old fishing buddy to find that "only" one guy was in the water. Aha, we'll be able to get in here, great! We saw that he was Spey casting and suggested that he take the lower part of Old Farts and that my buddy and I would rotate in the upper half.

His response was firm negative because "I'm Spey casting, I need this whole area!!!" There are often three, sometimes four fishermen fishing Old Farts, along with two or three more in the water immediately below it. This guy turned up to seven access spots into two !!!.
In my humble opinion, there are two potential solutions to this ongoing, and ever growing problem: 1) significantly enlarge the Fly Fishing Only, Catch and Release sections of the river downriver from a prominent structure like a bridge, boat ramp, abutment or overhead wire; and/or 2) make better use of the existing restricted pieces of water by mandating that they be fished with single hand rods only. As one who fishes Atlantic salmon I know that there are some Quebec rivers that have such restrictions. The pool below the Heppell Bridge on the Matapedia River, for example, is OK to fish with a two-handed rod UNTIL a fisherman arrives to fish the other side. At that point, the two-handed rod has to be replaced with a single hand rod so the pool can be shared. THAT is river management to maximize its fishing.
With regards to the open dates for the Upper Fly Section, I have been led to believe that when this piece of water was opened in the mid '90s or so, that the season it was closed effective December 1 was to protect bald eagles from "human interruption" during the winter. I trust you would concur that bald eagles have made a huge/remarkable comeback statewide. If this was, in fact, a concern for the December 1 closing it would appear that that reason is no longer applicable. In conjunction with suggestion #1 above, opening this piece of water during the winter would help take some pressure off the Lower Fly Zone.
Lastly, I often see the "culling" of fish when I fish water other than the Fly Fishing Only, Catch and Release sections. An angler will, for example, catch a "smallish" steelhead, put it on a stringer and continue fishing. When he catches a bigger steelhead he "releases" the one that had been on his stringer. Needless to say, that first fish does not stand much chance of surviving. I would suggest that when an angler decides to keep ONE steelhead that the law mandate that he has reached his daily limit and that he be done fishing for the day. No more "now I'm fishing for a brown or a Coho", only to catch and "release" (kill) a second or third steelhead.
I have been fishing the Salmon River since 1986. I look forward to doing so going forward but under different/better circumstances. I thank you in advance for your consideration of these suggestions. - Jay High
12) Here's an interesting you-tube video: 'Salmon Confidential, Documentary About Farms in Canada & Diseased Salmon' Maybe an independent group should test the hatchery water, river water every 300 yards, feeder brooks, streams, and water treatment plant output into the rivers. I'm curious if the water treatment plant treats chemicals and or prescriptions that are flushed. If the fish are sick or impaired, catch and release will not help in my opinion.
Every house, lodge and business along or near the river should be dye tested annually for septic leaks into the river. Boats and trailers need to be clean for invasive species.
Some creeks and streams should be stocked and closed as spawning waters. Make them nearly unfishable with fallen trees or posted fencing. Anyone caught poaching these closed waters should face severe fines.
Hatcheries: Perhaps the state has land containing suitable streams or ponds for bait fish hatcheries to combat the Thiamine deficiency. Smelt, Emerald shiners, golden shiners, suckers.
Predators: I use to fish the river for small mouth bass in the summer for fun. These smallmouth bass are devouring the trout and salmon fry. The open season for small mouth bass in this area should be all year like trout and salmon.

Violations: Serious violations should have serious consequences. Night fishing, exceeding limits, wasting, real snagging. Install no littering signs with a $100 or $200 fine. Additional signs asking anglers to report any and all violations. All signs should have two local hot-line numbers, one for voice the other for data (cell phone pics and video).
Awareness: On March 24, 2018 at 7am I saw half dozen dead trout fingerlings 5 to 6 inches at Ellis cove below the island. Lower end of the river (trooper to the 81 hole) has high quantities of green slime algae growing on the rocks, some over a foot long. I have never seen this in the spring before.
Closing: I have been fishing the river since the early 80's and I received my first ticket 3 years ago because my leader was 49 1/2 inches and that was $95. It was a violation, yes, yet to the left and right of me were two guys swinging 7 to 8 foot leaders. I had the right spot, line, weight, fly, drift and the only one catching fish. I was never into the snagging scene even when it was legal, no J-plugs, weighted trebles, none of that stuff. I have also seen small groups of 4 to 5 Russians and Canadians come into a spot and push people out to snag and nothing happens to them. I have family and friends that no longer fish the river because of angler and drift boat confrontations, theft, and property owners along the river. New York State should claim eminent domain of the Salmon River, river bottom and up to 100 feet from the river banks. The tax payers and license fees are not protecting this resource. - Jerry Brown

13) Note: This one is regarding the Franklin County Salmon River. I have reviewed the Salmon River Plan. No mention is made of any plan's or changes being considered for the annual flooding of the salmon river affecting local resident's and home owner's.
Can you explain the reason's this severe issue is not being addressed? It has been a well-known problem in this area during the past ten years, however nothing permanent has been done to help the Salmon River function better during the winter. Problem has been broadcast on national news station's. Local damaged bridges have been replaced; but no river flooding solution, or no permanent salmon river flooding protocols put in place.
Seem's to me the DEC needs to create an action team to manage the Salmon river during all season's during the year. I see there is a regulation of salmon river flow; and how much water to allow in the river. However, the rainfall; and snowfall, and below zero weather are not considered in water flow considerations. Since this happens every year, can't imagine why these problems are being ignored,
The salmon river flood in Franklin County affects the entire village of residents due to a treatment plant in the flooded street. The default of sewage being dumped into the streets and salmon river would affect the fish; not to mention the small community in the aftermath of cleaning chemicals being dumped into the salmon river during the health crisis cleanup.
Nine homeowners across the salmon river from me have lost their homes from the salmon river flooding in Franklin County. The problem is real alright.
Why is dredging not included in your plan where known locations have been forming ice dams. Local companies are being allowed to dump sand and waste into the salmon river. Why are they exempt from causing environmental problems within our local communities?
Awaiting your response. If there is anything I can do as a local resident, and flooded home owner, please advise. - Ken Brouard

14) Are you aware of the abandoned (orphaned) gas wells that exist in the Salmon River region? I do not see the topic addressed in the draft management plan, though I wonder how/if it

has a place in this kind of document. Let me know if this is an item for which we should provide some input to the draft plan. To me, it seems to relate to access more than anything else. These are unlikely to have an effect on groundwater quality, but they may represent health and safety concerns for anglers who may come across them. - Theodore N. Loukides DEC Chief, Compliance and Enforcement Section Bureau of Resource Development and Reclamation

15) Thanks for sharing the latest iteration of DEC's plan. I enjoyed the opportunity to be a part of the focus group in October, to offer comments on the draft you shared after that meeting and to add the following thoughts.

As mentioned previously by me and others, a planning document extending 15 years into the future is not workable unless you provide for a review and revision on a regularly scheduled basis. Circumstances and conditions change far too frequently to simply offer a 15-year plan without recognizing change as a key element of any working plan. You should be indicating you will be updating on a regular basis and sharing that information with the public. I do wish you would provide some indication of priorities within the plan, as surely not all strategies carry the same importance, nor can they be accomplished in the same time frame.

I like many of the elements of the plan, some addressing strengths and others weaknesses with respect to the current situation on the Salmon River, but do wish some were more specific and contained action items and a time-line. Perhaps periodic revisions of the document will lead to more specificity

On a very much related matter, when evaluating strengths and weaknesses of the Plan, the issue of threats to the fishery needs be mentioned. One threat looming over a substantial portion of the Salmon River watershed is the potential damage that could be caused by the Mad River Wind Farm project as proposed by Avangrid, Inc. I am pleased that you recognize potential threats to water quality in the upper reaches of the Salmon R. watershed and hope your stated strategy to "Monitor changes in watershed land use and seek to minimize adverse impacts on water quality and quantity" means the Fisheries Bureau as well as other key components of DEC will assess and work with the developer to mitigate the damage to wetlands and head water streams in the 20,000-acre footprint of the project. Few other large tracts of land in New York contain as much water in streams, swamps and other wetlands which are crucial to maintaining the high-level water quality that currently exists in the Salmon River. Rigorous monitoring will be required for the network of roads that will be constructed, culverts built and maintained to enable fish passage, and potential for substantial erosion in an area receiving significant precipitation year-round. - Dave Kohr

16) I'm an avid sportsman in Region 9. The Salmon River area is a special place for me. It's where I worked, studied, and played from 2000-04 while at ESF. I still make the trek to fish the Tug Hill as much as I can.
While working on my BS I had the privilege to be involved in Atlantic Salmon restoration research on the Salmon River and other Ontario tribs.
The reality of the industry around the Pacific Salmon population is very clear to me and causes doubt that any increase in Atlantic salmon will ever occur. Unfortunately, I think this is mostly due to the management of the fishery.

I can't speak for my colleagues, but a main conclusion that I've drawn from our work is: That competition from Pacific Salmon is a major if not driving factor in native Atlantic salmon survival from hatch to smolt.
Given the exceptional status of the King fishery, I'd lobby for the following basic plan.
Gradually or immediately curtail or reduce Pacific Salmon stocking numbers while stocking increased numbers of Atlantic smolts. Perhaps a one-to-one ratio. Harvest rates for Pacifics could also be increased.
I believe forage conditions in the lake are in a good state to make the effort worthwhile. I hope you'll consider these thoughts in developing your plans. - Gerrit Cain

17) Both my wife and myself mainly fish the 18 Mile/Burt Dam every year for a week vacation as we are from Pennsylvania. We do occasionally make day trips to the Salmon River, but prefer 18 Mile because of the "Fishing Ethic" there - it is not like that combat fishing we all experience at the Salmon River. The crowd at 18 Mile are just more cooperative and sportsman like for some reason?
When we do fish the Salmon River - we usually go to one of the "Special Reg" areas like the upper or lower fly zones to get away from those that will kill you for a fish so to speak. We would love to see more "Catch and Release" areas on the Salmon River. I would even support a "Special Catch and Release" area that would require a "FEE" paid with the yearly license that all proceeds went toward future land purchases to create more "Special Regs Areas"

I believe more and more anglers are seeking out these Special Regs areas to get away from those "Unethical" anglers. I also believe the DEC would be surprised at the number of anglers that would support additional fees to fish "Special Waters" and knowing that their monies are going to the efforts of creating more "Ethical Places" to fish.

I do want to state that all in all - the New York DEC does an OUTSTANDING job of maintaining the Salmon / Steelhead fishery, providing good access for all Anglers and their constant efforts at improving the Hatchery and Stocking Programs. This is by far better than anything we have here in Pennsylvania. - Ed Lengen

18) First I want to say thank you for taking the time to draft this management plan for the Salmon River. As I talk to people on the river I know they have concerns about the future of the fishery. Making this management plan available to the public gives them a better understanding of the complexity of this fishery and the management challenges that exist. I hope they utilized the opportunity to submit constructive comments.

Overall the objectives seem to me to be spot on. You already know I am passionate about this fishery and have opinions that are driven by that passion for how great this fishery could become. My question is what will the plan of action be in meeting these objectives?

To truly make the Salmon River a “premier, high quality, year-round sport fishery” many of the objectives directly involving the public can only be accomplished by a combination of three things: education, regulation and enforcement. These should not serve as impediments to succeeding in

making the Salmon River a world class fishery, but rather as necessary tools to achieve the management goal.
The areas of greatest concern for me are as follows:

Improve and expand angler access - As evident by angler car counts this past fall some areas are prone to overcrowding. Parking lots for Altmar North, Ellis Cove, Trestle North, Trestle South, 2A and Schoeller were filled to overflowing on Columbus Day weekend. It made for dangerous traffic conditions, as well as overuse of the area. More parking lots may not alleviate overcrowding problems, especially in years when there are exceptional numbers of fish. Fisheries should explore the possibility of creating a scenario on the Salmon River comparable to what is being proposed for the 'Blue Hole', specified maximum occupancy per lot. Opening additional lots (like behind the Chamber building at Sportsman South) may actually decrease the opportunity for a more remote fishing experience by making that section of the river more readily accessible to anglers on foot.

Increase responsible stewardship - Several inquiries/requests have been made regarding trash cans and port-a-johns since early November when these were removed. Many steelhead anglers pick up garbage left behind by those in salmon season and would like a receptacle in the lots to leave it in. Port-a-johns stationed at the launches in Altmar and Pineville are necessary throughout the steelhead season considering these are the two main lots used most often by drift boats. Permanent structures in these two locations may reduce vandalism.

Angler conflict is an ongoing issue. Frequent complaints are made by anglers, sometimes against other anglers but most often against drift boats. Stricter regulations for drift boats may limit their numbers. Make drift boats in the fly zones illegal. Move the most upriver launch from Altmar to Ellis Cove, providing that stretch of river as a drift boat free zone.

Maintain a high-quality fall sport fishery – Institute a Pacific Salmon 'season'. Pacific Salmon are the priority species each fall, as proven by data collected for target species in the angler surveys. A majority of anglers who fish at this time of year prefer to harvest fish. By creating a season specifically for Pacific salmon, it would allow an opportunity for regulations (C&R) to protect Steelhead, Brown Trout and Atlantic Salmon from indiscriminate harvest.

Maintain a high-quality winter/spring sport fishery – Instituting a season for Pacific Salmon as outlined above would result in an increased number of 'white-mouthed' fish during the winter/spring season, providing for more angling opportunity. Any harvest of Brown Trout should be limited to one fish. In addition, a no harvest regulation on Steelhead that coincides with spawning and drop-back season would protect these fish during and after the rigors of spawning and when returning to Lake Ontario. Close the tributaries to fishing or at least make them C&R after Pacific Salmon season. Protecting Steelhead that are in the brooks from harvest would allow for the probability of higher wild juvenile production. It would increase fishing opportunity not only in the brooks but also in the Salmon River as well during drop back season.

Improve the quality of the summer sport fishery – This is likely the most challenging of seasons on the Salmon River as far as numbers of fish. To establish a summer fishery that would be worthy

of encouraging anglers to travel to the Salmon River, more angling opportunity is needed (as in more fish). When developing an Atlantic Salmon restoration plan for the Salmon River a no kill regulation should be implemented to protect Atlantic Salmon throughout the 'restoration' period. Instituting zero harvest is the only way to ascertain without bias if they can be successfully restored. This should pertain to the lake fishery as well. When fall fingerlings are stocked split the total number between Beaverdam Brook and the hatchery smolt pond, instead of 100% stocked into the smolt pond.

Develop a plan to re-implement the methods previously used for collecting adult Skamania Steelhead that return to the hatchery during the fall run. This is the best option for getting the summer component back.

Stocking surplus Brown Trout in the Salmon River the last few years has certainly been encouraging. Conversely, it is discouraging that these fish are harvested with blatant disrespect for regulations regarding minimum size and limits. Coupled with small numbers of Atlantic Salmon, Skamania Steelhead and current regulations, angling opportunity is limited. To 'grow' a productive summer fishery, enact C&R for all trout species and Atlantic Salmon. Also, consider a restriction on live bait, make it artificial use only.

Use science…and inform adaptive management strategies – Regarding "utilizing creel survey results…." allowing the fishermen to identify species kept may not yield the degree of reliable information necessary to make informed management decisions. I believe for angler surveys such as the Lake Ontario boat survey the techs identify the fish. I have been asked to identify fish, as well as asking fishermen who seem unsure, if they want me to identify their fish. Often in these scenarios their identification is incorrect. They have always been appreciative of the information I relay to them. This is the perfect opportunity to educate the public.

I encourage the DEC to hold open public meetings on an annual basis to review and discuss the progress of the Salmon River Fisheries Management Plan. I appreciate your time and effort Dave. I realize my comments may be more specific than what you wanted but I'm sure you can relate to why they are, given my history over the last decade on this river. - Rose Greulich

19) My disagreement with the proposed Salmon River Fisheries Management Plan is based on the lack of attention to a major industrial development targeting the core forest of the Tug Hill Plateau. The Mad River Wind Farm would be located at the headwaters of the Salmon River. It is described as the largest commercial wind operation in the state. The Department of Environmental Conservation should go on record with strong disagreement to this project.
"The greater Tug Hill, in which the Salmon River watershed is embedded, is a region where exceptionally good water quality is predicted due to an overall lack of impervious surface and to high levels of forest cover (Figure 4). A recent analysis conducted by The Nature Conservancy (TNC) that used six indicators of watershed condition (population density, road density, protected lands, dam density, natural land cover, and interior forest cover) determined that the Tug Hill area represents one of the most intact landscapes in New York (NYSDEC 2006a, Figure 5). The region contains over 4,000 miles of rivers and streams, 117,000 acres of wetlands, and one of the largest (121,000 acres) intact forest blocks in the state."

The above excerpt was taken from the, Salmon River Watershed Natural Resources Assessment. It was posted on the D.E.C. website. It explains the importance of the Core Forest to the Salmon River Watershed.
Also, taken from the D.E.C. website, is this statement: "DEC's goal is to manage the Salmon River and its tributaries as a year-round sport fishery that provides anglers with the opportunity to catch an array of trophy-sized salmonids. DEC proposes a variety of strategies to achieve this goal, including improvements to its Salmon River Fish Hatchery, improved and increased angler access, efforts to promote ethical angling, protection and enhancement of critical fish habitats, and utilizing science and adaptive management to measure and achieve success."
Strong language that includes what severe consequences would occur, if projects like the Mad River Wind Farm are built, should be included in the plan. If the above D.E.C. goal is accurate, condemnation of industrial projects in the Core Forest of Tug Hill should be made publicly in documents like, the D.E.C.'s Salmon River Fisheries Management Plan. - Edward Reed
20) I recently read the draft version of the Salmon River Fishery Management Plan and I have several concerns.

Many attempts have been made create a sustainable Atlantic salmon population in the Great Lakes. Apparently the only successful Atlantic salmon program is located on the St. Mary's River and is operated by Lake Superior State University. It is in a perfect location where water temperatures are near perfect year-round with lots of cold water available from Lake Superior. And the hatchery enables the Atlantics to imprint in those near perfect conditions. Those conditions cannot be met with any hatchery in New York State.

With particular emphasis on the proposed Atlantic salmon program……..

Other locations the Great Lakes have been tried. Ontario has used the Credit River with a massive stocking of Atlantic salmon yearly and have gotten returns of less than 50 fish. The annual cost to get a return of 50 fish is simply not worth it. Ontario also has tried stocking the Ganaraska River which was well known for major steelhead runs with significant steelhead natural reproduction. Stocking Atlantics of significant size when steelhead eggs are hatching is simply going to destroy the steelhead fishery. I really don't know how you can have a significant steelhead fishery with natural reproduction and stock significant numbers of Atlantics at the same time. If the returns of Atlantics are anything like that on the Credit River, the return of a microscopic number of Atlantics will be the tradeoff for a significant reduction in the wild steelhead fishery.

The Salmon River and Lake Ontario fishery is based upon the stocking of chinook, coho, steelhead, and brown trout. And that stocking program is demonstrably successful. Trying to put significant numbers of Atlantic salmon into the mix would have the following impact.

A) It would reduce funds available for other stocking programs for fish that succeed in the Lake Ontario/Salmon River system like chinooks, chaos, steelhead, and brown trout. Money for current fishery programs is limited as it is.

B) There would be significant expenditure of fishery funds with little to no return (in terms of significant Atlantic salmon populations) based upon past experience.

C) Hatchery space is finite as a given. Using space for Atlantic salmon that would otherwise be used for chinook, coho, steelhead, and brown trout means replacing species that do work in the Lake Ontario/Salmon River system with a species that either won't work or will have a minimal impact on the magnitude of the fishery.

There are other considerations with Atlantic salmon in the Salmon River including summer water temperatures and low water meaning reduced survival and a very high likelihood that the fish will simply be slaughtered by a limited number of "fisherman" on the river. The question of the genetics of the Atlantics to be stocked is another consideration. Are the stocked Atlantics of inferior genetics that prove to be unsuitable for the conditions today in Lake Ontario? Give the failure of most Atlantic salmon stocking programs, the genetics the stocked fish is at best questionable.

The draft management plan makes references to law enforcement on the Salmon River. Since I have retired, I fish the Salmon River for salmon and steelhead and easily spend 20 days a year on the river. Over the past 5 years, I have never seen any DEC law enforcement officers on the river and have never been asked to show a fishing license. I have seen lots of poor conduct on the river including foul hooked fish not being released, rampant snagging and lifting particularly by individuals from the NYC area speaking foreign languages, on top of simply rude behavior. Most anglers are really pretty good on the river and are respectful of other anglers and the law. But at this point, from my personal observation, DEC law enforcement has been something between ineffective and nonexistent.

Also, the draft plan seems to indicate a desire to create a substantial summer Salmon River fishery which would in turn create a positive summer economic benefit for Pulaski and Oswego County. There already is a busy summer tourist season in Oswego County with many coming in for camps and cottages on Lake Ontario and the various area rivers and to experience the warm water summer fishery for bass and panfish in addition to the year-round salmon and trout fishing on Lake Ontario. By trying to implement an Atlantic salmon program, with the costs involved and the potential for a decrease of successful stocking programs for species like the chinooks and browns, we are looking at a reduction of a successful fishery on Lake Ontario and in the Salmon River. Given that there is no successful Atlantic salmon stocking program that can be used as a model for a Salmon River Atlantic salmon program, I have serious doubts about the viability and effectiveness of the draft report as written. Unless there are guarantees that the current stocking program for the Salmon River and Lake Ontario will be maintained, with a continued emphasis on chinooks and an increased emphasis on brown trout, coupled with significantly enhanced DEC law enforcement presence on the Salmon River, I cannot support the draft plan. - Bill Pingel

21) Thank you for the opportunity to comment on the Draft Management Plan for the Salmon River Fishery. I realize that this is a general document and that specific actions will need to be formulated within the guidelines of the plan at later dates, and will try to keep my comments brief and focused in that context.
The Current Fisheries Section contains the statement "The River supports year-round sport-fishing opportunities and qualities that are rare, if not unique in the Continental United States. Non-

Resident license fees do not reflect this, and should be raised to better capture revenues necessary for realizing many of the actions needed to make the quality of the fishery improve.

The statement on chances of catching Atlantic salmon, brown trout, and Skamania steelhead being greater in the summer has no data supporting it, and is illogical in light of the catch and release nature of the summer fishery. Fish that are available in the summer are also available in the fall, unless they were harvested, or they are isolated in upriver sanctuary areas, and no data on harvest or numbers is presented or cited, is presented.

The description of the steelhead fishery indicates "the winter/spring fishery predominately focuses on steelhead. What other fish are available in the winter/spring? Later, the reader is told "most of the winter/spring fishery." Again, while there may be a few Skamania fish or holdover brown trout, anglers are seeking Washington strain steelhead and the solitary nature of this species needs to be emphasized, especially when discussing the open lake fishery and the tributary fishery.

The discussion of the summer fishery inflates the presence of Atlantic salmon and Skamania steelhead, which are both still rare fish for anglers to encounter, and seems to equate stocked yearling and two-year-old brown trout, which are at most ~15" in length, with a fishery for the larger fish that have spent time out in the lake. This is also contradicted in the section on Brown trout, which indicates that the Atlantic/Skamania fishery is not yet viable. Again, more actual data on numbers and catch rates is needed.

It might be useful to identify which of the Fishery Management Challenges can be controlled. From my standpoint, DEC has no control over summer water temperatures, survival of trout and salmon in Lake Ontario (except perhaps by limiting harvest of fish that have recruited), thiamine deficiency, and limited control over many of the Potential Threats. Similarly, Management Challenges that are mainly revenue based should be identified and some estimate of the scale or scope of the revenue needs should be made, both to give some sense as to whether an improvement is doable, and to have a sense of what will be necessary to pay for the improvement. Revenue driven challenges appear to me to include Angler Access, Salmon River Hatchery Water Supplies, and potential threats such as Knotweed, where eradication programs are severely limited by the cost of intervention. I would also point out that there is no discussion of a lack of infrastructure supporting the recreational fishery in the form of sanitary facilities the lack of which I know comes up often in discussion with local residents.

Control could definitely be exercised on Differing Angler Desires and Social Issues, and Angling Ethics and Law Enforcement. However, the direction taken here will be determined by what is considered the desirable endpoint of the fishery, which is not necessarily clear in the plan. Most of my comments on these will constitute the closing section of these comments.
Comments specific to Objectives:
Acquisition of additional PFR easements would seem to me to be a pipe dream as long as the traditional $30,000 per mile for both banks easement payment structure is maintained in New York (please excuse me if this has changed, but I have seen no news of a change). Identification of properties and estimation of the real value of the fishing rights, and identification of revenue source(s) are needed for this to be more than just words. A bullet indicating installation and

maintenance of permanent sanitary facilities in at least a few angler access sites should be made a priority for this section as well, both for improvement of angler/resident relationship, improvement of access site aesthetics, and possible protection of water quality.

The two bullets dealing with identification of thermal refuges and protection of the same in the section on habitat contradict the discussion of the summer fishery. It is disingenuous to tout the quality of the summer fishery and then imply that those of us who have been using this resource will likely be regulated out of it (especially discouraging to an individual in his 60's). Similarly, if the important spawning tributaries are part of the angler access mileage numbers, there is another contradiction that needs to be resolved.

There is no mention of evaluation of wild steelhead production, which should be possible using the fish marking trailer after the Coho study is completed. This should be done on the main river as well as in Trout and Orwell Brooks. If these are significant nurseries, consideration to closing them as refuge areas should be made.

The objectives for the summer sport fishery need to be quantified. What is an "adequate summer run of Atlantic Salmon?" Will "surplus yearling and two-year-old brown trout" adequately substitute for elimination of angling in "thermal refuges" for Atlantic Salmon and Skamania steelhead. A further question here is will identifying thermal refuges actually highlight these areas and make them more susceptible to poaching, or harvest once the fall fishery is underway? From a revenue standpoint, define what would be needed to replace the ability to overwinter Skamania steelhead to better improve their separation from Washington Strain and return them to a summer running mode, or possibly evaluate abandoning the program if the needs for a facility cannot be met.

The remainder of my letter will deal with the challenges of Differing Angler Desires Social Issues, and Angler Ethics and Law Enforcement, and the objective of "Maintaining a high-quality Fall Sport fishery". Data is cited in the draft indicating that 65% of the effort on the Salmon River is nonresident. I maintain that at least part of the reason for this disparity is that many resident anglers have been driven off the river by the lack of angler ethics displayed in the fall, and the at least perceived lack of effort to change this situation on the part of river managers and NYSDEC Law Enforcement. Those of us with long experience in the Finger Lakes, and then the Lake Ontario Tributaries, have witnessed, and heard the arguments justifying, lifting or single hook snagging, for many years, and have fought a long and sometimes lonely battle to promote ethical angling, in which the fish takes the bait or lure, and to continue classification of lifters and snaggers with other poachers. Since the regulations guide was modified to include lifting as an illegal technique, we have observed the development of alternative methods to circumvent the intention of the Fish and Game Law in New York, mainly practices known variously as lining, force feeding, or flossing, where the fish is hooked in the vicinity of the mouth, but generally from the outside of the fish inwards. While the definitions available in the regulations guide are not clear, I contend that the law is. Title 1 §11-0103c. states" Hooking", "snatching" or "snagging" means taking fish that have not taken or attempted to take a bait or artificial lure into their mouth, by impaling fish with one or more hooks or similar devices, whether or not baited, into any part of their body." This language clearly indicates that action toward the bait or lure should be made by the fish, and the bait or lure has to be taken "into" the mouth, which I contend implies into the space enclosed

by jaw structures. A fisher who calculates where a fish should be holding in a standing wave and then drifts a bait into the vicinity of the fish, perhaps even getting the line to which the bait is attached to enter between the upper and lower jaws of a holding fish, and then hooks the fish in the head area, but from the outside of the fish inward, is snagging the fish under this definition as surely as if he used a treble hook encased in lead, or was feeling for the fish and then "throwing a lift". The language in NYS Law is consistent with the "fair chase" standard of angling ethics which I have been taught since childhood. "§ 11-1321. Other prohibited acts" further lends emphasis to this prohibition by adding: "9. Pacific salmon shall not be taken by hooking, snatching or snagging. Pacific salmon taken by hooking, snatching or snagging shall not be possessed, transported or otherwise trafficked in." Problematic in the draft plan is the objective of "maintain a high-quality Fall sport fishery" which appears to only equate quantity with quality. Once the main run of salmon enters the river, the quality of the fishing experience deteriorates as crowds descend on the river, intent on harvesting their limit of fish in any way possible. The current DEC advise on "how to fish for Pacific Salmon and trout" is treated by the majority of these fishers as a joke, and the common perception, broadcast widely recently on the internet, and reinforced by many of the "guides" on the river, is that lining fish, or hooking fish near the mouth, is completely legal. The absence of Law Enforcement actions, even directed at more blatant practices such as lifting, reinforces this perception. This "circus" atmosphere, and the perceived "nudge, nudge, wink, wink" attitude toward these actions by NYSDEC discourages the legitimate angler from coming to the river, so the lowest common denominator of Northeast "sportsmen" make up the majority of people , and, possessed of a low attitude toward the fish and the legality of methods of taking them, many of these people also treat the area and its residents and their property with less than the necessary respect, leading to a general dislike for fishers on the part of residents who are not profiting from the fishery, and to littering and other negatives on the river. This unsportsmanlike behavior is also starting to show up during the early part of the winter season, with the lining of steelhead observed heavily in later October of 2017. One part of the problem is that the current regulation guide does not reflect the wording of the law, indicating "in the mouth" and containing no illustration or definition of the mouth. Rather than a passive campaign on this issue, as suggested in the draft plan, I think a more active set of definitions and illustrations needs to be provided, consistent with the intent of the lawmakers who adopted the current fishing laws, and with the generally accepted standards of what constitutes ethical behavior towards a fishery. However, an alternative to this would be to define these practices as acceptable, but his carries the risk of such practices spreading to other New York fisheries, something that is likely already happening, and of a loss of prestige for the State of New York in the eyes of the rest of the angling community.

I also think that non-resident fees should be increased to be in line with other states and provinces that offer this quality of fishery. An annual license to fish for freshwater fish in Southeast Alaska currently costs $145.00, and a King salmon stamp is also required to harvest this species. Salmon fishers in many Canadian provinces are required to hire a guide while fishing. Raising non-resident license fees to be more in line with other areas with unique and desirable fisheries and instituting a tributary stamp or Salmon River stamp would provide revenue that could be used to maintain and improve infrastructure, potentially acquire further public access, and potentially cover the cost associated with increased law enforcement.

Thank you for the opportunity to comment on the draft plan, and I look forward to the final plan and to the management actions that will of necessity be developed in response to the plan. - Charles L. Knauf

22) Thank you for the opportunity to comment on the draft "Salmon River Fisheries Management Plan". This draft plan appears to be an excellent "frame work" around which management decisions can be based for the next 15 years. It was encouraging to see spelled out in this document the importance of the Salmon River as a premier "World Class Fishery" to the State of New York. In my opinion the Salmon River fishery has remained in the shadow of the Lake Ontario fishery for too long! Below are my comments/concerns [have about the draft plan:

Page 3 - " Fall" You are downplaying the importance of the steelhead in the fall component of the fishery. In the lower river, I typically start catching steelhead by September 15th. This past fall adipose clipped Skamania were common in many of the steelhead I saw caught in late September/early October. These fish are what many anglers consider to be the real trophies and need to be recognized and protected.

Page 4 - " Winter/Spring" The current stocking policy of 120,000 yearling steelhead is not sufficient to handle the 1.1 million angler hours of effort on the Salmon River. This number should be augmented with a percentage of fish taken from the stocking policies of other tributaries which get far less angler pressure.

Page 5 - " Brown Trout" There needs to be a formal annual stocking policy of brown trout for the Salmon River. These fish could provide an Oak Orchard Creek style component to the fall fishery. A small percentage of brown trout taken from the allotment for Lake Ontario would not be missed.

Page 6 - " Differing Angling Desires and Social Issues" Drift boats need to be better regulated and limited in number. Why should a hand full of guides making money off a Public fishery spoil the experience for the vast majority of anglers who fish from shore? The current drift boat launch at the bridge in Altmar should be closed off and moved downstream to the Ellis Cove area. This upper 0.8 mile stretch of river is small water that is easily accessible to wading anglers. The intimate atmosphere of this section totally is destroyed by a constant string of drift boats coming down from the Altmar launch and clogging up the runs. With the tremendous amount of fishing pressure it receives why not declare it a "boat free zone"? (NOTE: This comment was also provided by Mr. Moore regarding the Lower Salmon River Restoration and Recreation Plan).

Page 7 - "Survival of Trout and Salmon in Lake Ontario" I agree with your statement that "angler harvest in the lake has some influence on fishing quality in the River". The daily creel limit on steelhead in the lake should be reduced to I fish per day to insure an equitable distribution of the resource.

One last comment. I believe there is a need for an annual "State of the Salmon River" public meeting in Pulaski separate from the "State of Lake Ontario" meeting. This meeting could be held in September at the start of the fall season when more people would be around to attend and present such things as:

- Results of the previous year's Salmon River Creel Survey data
- Summary of the length/weight/age data collected on adult steelhead returns to the hatchery
- Give progress report on parking lot & stream improvement projects
- Allow anglers to voice their concerns on any issues /problems

Paul Moore

23) Thank you for this chance to comment on the "Draft Salmon River Fisheries Management Plan." appreciate the opportunity to react to this plan, and to share some of my thoughts. I fished the river 69 days last year, and consequently spent a lot of time associating with other anglers. No one that I spoke with, or listened to, supports the current policies. Many are even contemptuous of them. This plan represents a crossroads. It offers an opportunity for the NYSDEC to improve its image by better management of the Salmon River fishery, and to better serve the anglers who purchase licenses.

1. Greatly increase the management practices that will enhance the steelhead, brown trout, and Atlantic salmon fisheries and fishing opportunities for them.
2. Reduce the steelhead take on the lake to increase the numbers of fish available to river anglers...this resource outweighs the importance of the lake charter industry, and if better managed, has the potential for substantially greater economic benefits to local communities.
3. Change the culture of the Salmon River! Upgrade angler ethics and practices though serious, effective angler education and much greater enforcement of existing regulations. Posted signs alone will not achieve this objective. Whenever I mention my passion for fishing the Salmon River to others, I am surprised at the immediate negative responses from friends, neighbors, and colleagues. Frankly, the Salmon River does not enjoy a good reputation. This is unfortunate, and does not help with the public support of the NYSDEC. Better education, enforcement, and public relations can change this.
4. Expand the fly zones with their existing regulations. The crowded conditions in the zones clearly argue for this need. Anglers exhibiting the best practices and attitudes deserve far more space and attention.
5. Demonstrate to the public and to anglers that this Plan has resulted in documented improvements to the Salmon River fishery. - Andrew Saunders

24) The Salmon River is located in Oswego County, New York. The importance of this river to both the Lake Ontario lake fishery AND tributary fishery is undeniable. The Salmon River, the Salmon River Fish Hatchery and the species of fish that return to spawn each year are, together, what has made both the tributary and lake fisheries great.
The Salmon River Fish Hatchery, located adjacent to the Salmon River, is the only hatchery in New York State that collects eggs and rears fish for the statewide stocking of Steelhead, Chinook Salmon and Coho Salmon. In the last few years mature Atlantic Salmon have also been collected and transported to the USGS facility where they are held and then spawned, producing young Atlantic Salmon which are stocked back into the Salmon River.
In order to meet stocking quotas for the above species, the program is dependent on sufficient numbers of mature fish being able to navigate the Salmon River from Lake Ontario to the Salmon River Fish Hatchery - an upstream journey of about 13 miles. It is no coincidence that the time of

highest angler pressure occurs at the same time as the fall migration of mature pre-spawn fish into the Salmon River.
Mature Pacific Salmon (Chinook and Coho) return to the Salmon River each fall to spawn (lay their eggs). Pacific Salmon spawn only once in their lifetime and die after spawning. At the same time, Steelhead, Brown Trout and Atlantic Salmon are present in the river. These fish may spawn multiple times in successive years over their lifetime. Even though many fishermen are targeting Pacific Salmon during this time, they also keep Steelhead, Brown Trout and Atlantic Salmon. Often these fishermen do not even know what species they have kept, harvesting mature Steelhead, Brown Trout and Atlantic Salmon before they have an opportunity to spawn.
It is without question - in recent years the numbers of Steelhead as well as Brown Trout returning to the Salmon River have declined. This has been echoed by professional fishermen, business owners and anglers across the state. Fewer fish present in the river leads to lower angler success. That, in turn, results in a decrease in the number of angler trips to the Salmon River and less revenue for the local economy. Three negatives that have a huge impact.
We all understand that due to the current situation with the forage base an increase in stocking numbers is not a practical nor biologically sound option at this time. In order to be confident that the NYSDEC can continue to meet the Salmon River Fish Hatchery's egg requirements for Steelhead in the future, and provide adequate numbers of Atlantic Salmon, Steelhead and Brown Trout to support a viable fishery, we feel changes need to be made now. Our proposals would serve to protect these fish at their most vulnerable times.
We feel our proposals would help to ensure that the Salmon River Fish Hatchery can continue to meet their egg quotas while providing the quality angling experience and thriving fishery the Salmon River is known for. At the same time these proposals would represent the best opportunity to support the local economy.

Our Goal: Enact regulations to conserve Steelhead, Brown Trout and Atlantic salmon present in the Salmon River in order to sustain and enhance diverse populations of fish species while providing quality recreational angling opportunities and a thriving local economy.

Listed proposals would be for the Salmon River (Oswego County) and its Tributaries (Salmon River Downstream of Rt. 52 Bridge in Altmar)
Catch and Release proposals would be by any legal angling method currently in place.

Proposal I:
Year-Round Catch and Release for Atlantic Salmon.

Proposal II:
Catch and Release Season for Steelhead and Brown Trout from March 15 – November 15.

Proposal III:
Increase the minimum Size Limit for Steelhead from 21 inches to at least 25 inches.

Proposal IV:
Reduce the Daily Limit for Brown Trout from 3 Fish to 1 Fish.

The proposals we have suggested are for fishing regulation changes on the Salmon River, Oswego County, New York. This is the river we know, live on and fish.
Our goal is: Enact regulations to conserve Steelhead, Brown Trout and Atlantic salmon present in the Salmon River in order to sustain and enhance diverse populations of fish species while providing quality recreational angling opportunities and a thriving local economy.
This aligns well with the NYSDEC Bureau of Fisheries Mission Statement: "Conserve and enhance New York State's abundant and diverse populations of freshwater fishes while providing the public with quality recreational angling opportunity.
The Salmon River is a world famous "one of a kind" fishery on the east coast. This world class fishery draws anglers from across the globe, tens of thousands of tourists each year, bringing in millions of dollars to the local economy. The Salmon River offers some of the finest sport fishing in the country and is home to five species of cold water sport fish – two species of Pacific salmon (Chinook Salmon and Coho Salmon), as well as Steelhead, Brown Trout, and Atlantic salmon. Our proposals and objectives center on Atlantic Salmon, Steelhead and Brown Trout.

Many people don't realize the Salmon River was named for the Atlantic Salmon. In 1983 the Environmental Conservation Department was quoted as stating they would like to have a "small and self-sustaining population of Atlantic Salmon to augment the superb fishery". They went on to state: "we will, for a time, probably do everything we can to prohibit any harvesting of the species". To date, the only "limitation" placed on Atlantic Salmon is the minimum length of 25" and a daily limit of one fish. In order to get a true measure of the success of this restoration project it would seem appropriate to institute a zero limit on these fish. As Atlantic Salmon appear to be returning with more regularity to the Salmon River, the excitement over the unique angling opportunity this heritage species affords should not be overlooked. The increase in revenue to the local economy would be a welcome.
Information presented at the State of the Lake meeting in March 2017 reported that Brown Trout and Steelhead catches were greatly reduced. Recent reports listed Brown Trout as fairly scarce in 2015-2016. It is well known that the thiamine problem that occurred a few years ago led to a significant loss of Steelhead. Although the Salmon River Fish Hatchery was successful in reaching their egg take quota in the spring of 2017, it is difficult to ascertain the true number of Steelhead that did return to the river.
We believe that changes should be implemented to retain more Steelhead and Brown Trout in the Salmon River during the tributary angling season. Appropriate strategies would be aimed at protecting "first spawner" Steelhead and limiting harvest of these fish during times when they are most vulnerable. Steelhead and Brown Trout numbers would benefit from being protected during times of increased angler pressure.

The NYSDEC periodically conducts a Tributary Angler Survey on the Salmon River. The goal of this survey is to collect data directly from anglers during a short interview. The interviews record site, date, interview time, residency, angler party size, start time, time taken for breaks, trip status, species targeted, fish kept or released, weather effects and relevant comments. The Tributary Angler Survey on the Salmon River typically runs from early September to mid- May, spanning both the Pacific Salmon season and the Steelhead season. The results are presented at the State of the Lake meeting and are included in the NYSDEC Lake Ontario Annual Report.

The Salmon River draws anglers from other states as well as internationally. In the last four Tributary Angler Surveys, on average, 65% of the anglers surveyed were non-New York State residents. Each year, late summer and early fall heralds the arrival of anglers to the Salmon River. Peak effort on the Salmon River typically occurs in September and October.

Angler effort (fishing time in hours) on the Salmon River is phenomenal. In each of the last four Lake Ontario Tributary Angler Surveys, the Salmon River consistently surpassed all other Lake Ontario tributaries combined for total angler hours for the period from September through November. The 2012 Lake Ontario Tributary Angler Survey reported that the Salmon River angling effort alone exceeded the Lake Ontario boat fishery by nearly 179,000 angler hours. According to the 2015 Lake Ontario Tributary Angler Survey, the Salmon River accounted for 74% of the total angler effort for all Lake Ontario Tributaries.

This chapter is asking for changes that would conserve the number of Steelhead, Brown Trout and Atlantic salmon in the Salmon River. The preferred way to do this would be through special regulations such as catch and release seasons, increases in minimum harvest lengths and reductions in the number of fish that can be harvested. These regulations would serve to maximize angling opportunities for all.

Management efforts should be responsive to the needs of the angling community. Special regulations are designed to maximize angling opportunity while protecting populations from over-exploitation. They provide protection to vulnerable migratory fish prior to spawning in areas of high fishing pressure. They limit the harvest, equitably distribute the resource among users and promote ethical use of the resource. Special regulations are used to provide a high-quality angling experience and can be used to provide for unique angling opportunities.

We see catch and release as a special regulation that would accomplish many of our objectives. Catch and release is a conservation practice developed to prevent over harvest of fish stocks and is a means of preserving and enhancing fish populations. Catch and release is a way anglers contribute to fishing's commitment to conservation and preservation of our natural resource.

A willingness to practice catch and release allows fish to reproduce. It helps ensure the future of the sport. In catch and release areas anglers typically can catch many fish and if all these fish are released it can have a very beneficial impact on general angler success rates.

Proposal I:

Year-Round Catch and Release for Atlantic Salmon.

Atlantic Salmon: The Atlantic Salmon is one of the most highly regarded sport fish in North America and world renowned as a sport fish. Lake Ontario once supported the largest freshwater population of Atlantic Salmon in the world. These fish were once native to Lake Ontario and the Salmon River. Since 1996 there have been serious efforts to reintroduce this species to the Salmon River. Right now, the sole effort (for stocking USGS Atlantic Salmon) in New York is in the Salmon River. The released fish will create a Lake Ontario egg source of Atlantic Salmon at sites where they can be readily captured as adults, spawned, and re-released into Lake Ontario tributaries. The collection of live, mature pre-spawn adults from the Salmon River is imperative to this project. The goal is to re-establish a heritage species that had a prominent place in the cultural history of the region. Atlantic Salmon run the rivers from June – November and spawn in the fall. Since they are summer run, they provide an opportunity for a summer fishery in the

Salmon River along with Brown Trout and Skamania Steelhead. There's real hope it can be an economic boost to the upstate New York economy, especially in Oswego County, to have thousands of Atlantic Salmon returning and providing a fishery in the summer months. Reintroduction of Atlantic Salmon will provide greater fishing opportunity in Lake Ontario and restore the natural balance of the Lake Ontario food web through providing additional (more diversified) top predators. Restoration of native fish is also expected to mitigate previous effects of invasive species and reduce opportunities for new invasive species to colonize the lake by increasing food web resistance to invasion.

The 2013 Fish Community Objectives for Lake Ontario endorsed Offshore Pelagic Zone Goal

- Restore Atlantic Salmon populations and fisheries. Status/Trend Indicator: increasing angler-catch of wild and stocked Atlantic Salmon in Lake Ontario and in the Salmon River, New York. Progress Indicator: increasing wild production of Atlantic Salmon in the Salmon River system and increasing returns of wild, mature adults to Beaverdam Brook.

Proposal I Objective: Protect this native species to establish a viable population.

* Re-establish this heritage species.
* Allow an opportunity for natural reproduction.
* Retain fish that return, as they are the desired genetic stock.
* Provide a "unique" summer fishery and angling opportunity on the Salmon River.
* Supplement the limited number of Skamania (summer run) Steelhead.
* Provide diversification of top predators which will help restore the natural balance of the Lake Ontario food web and mitigate effects of invasive species.

Proposal II:

Catch and Release Season for Steelhead and Brown Trout from March 15 – November15.

Washington Steelhead (Winter Run): Steelhead is the primary species sought by post pacific salmon run tributary anglers. This fishery gains momentum in mid-October as Steelhead enter the tributaries (and the pacific salmon run begins to decline) and extends into April and May in some cases. As a result, Steelhead are the most important species in the tributary fishery for a large portion of the tributary angling season since the pacific salmon run is essentially limited to September and October. Winter run Steelhead spawn from mid-March through April. Age 3, 4 and 5 fish generally account for 90% of the spawning fish each year. The average size of the Washington Steelhead in a run would be 6 pounds for age 3, 9 pounds for age 4, and 12 pounds for age 5 fish. Average weight by length for a Rainbow Trout (Steelhead) would be 5lb 11oz for a 25-inch fish. For steelhead returning to the Salmon River Fish Hatchery, age 3 is the first significant spawning age. The average size of age 3 males is 27 inches and females are 28 inches. The age 4 fish are a bit larger, but not by much.

The 2013 Fish Community Objectives for Lake Ontario endorsed Offshore Pelagic Zone Goal

- Maintain Rainbow Trout (Steelhead) fisheries. Status/Trend Indicator: maintaining or increasing catch rates of Rainbow Trout in the lake and tributary fisheries. Status/Trend Indicator: maintaining or increasing population, recruitment, and growth of adult Rainbow Trout in selected tributaries (New York – Salmon River).

Skamania Steelhead (Summer Run): Skamania Steelhead offer the potential for a summer tributary fishery on the Salmon River. These fish can enter the river as early as May with the bulk of the

run coming in the June – September period. Skamania spawn from late February through early April.
Brown Trout: Brown Trout contribute to the fall fishery. Some from Lake Ontario make their way into the Salmon River and are taken, usually later in the fall along with Steelhead. Brown Trout on the Salmon River were fairly scarce in 2015-16. In the fall of 2015 Brown Trout harvest in the Salmon River was 7%; the lowest in the four most recent fall surveys. In the past, the DEC also attempted to develop a population of resident Brown Trout to provide a summer fishery. In the last few years, the Salmon River has been fortunate to receive stockings of surplus Brown Trout in the spring. These fish have the potential to become resident fish, remaining in the river for life.

The 2013 Fish Community Objectives for Lake Ontario endorsed Offshore Pelagic Zone Goal
- Maintain Brown Trout fisheries. Status/Trend Indicator: maintaining or increasing catch rates of Brown Trout in the lake and tributary fisheries.

Tributaries of the Salmon River: Some of the Steelhead that run the Salmon River are produced in Trout and Orwell Brooks, which are tributaries to the main stem. These brooks host hundreds of returning steelhead and natural reproduction is fantastic in these streams.

Proposal II Objectives:
1. Protect spawning and post spawn Steelhead from being harvested from mid-March thru early May.
* Protect spawning fish during their most vulnerable time.
* Allow an opportunity for fish to reproduce naturally.
* Increase the possibility of a more varied age class recruitment in future runs.
* Retain fish throughout the spring season.
* Provide increased angling opportunity.
2. Protect Skamania Steelhead returning to the Salmon River.
* Retain fish to enhance the late fall, winter and summer fishery.
* Provide increased angling opportunity.
3. Protect stocked surplus hatchery fish (such as two-year-old Brown Trout) from being harvested throughout the summer months.
* Retain fish to enhance the summer fishery potential.
* Provide increased angling opportunity.
4. Protect mature pre-spawn Steelhead and Brown Trout until mid-November.
* Retain fish during a time of highest (indiscriminate) angler harvest.
* Retain fish for when species variety is limited.
* Provide increased angling opportunity post Pacific Salmon season.
* Protect these fish in early November when law enforcement availability decreases due to hunting season and the incidence of illegal activity is high.
5. Protect Steelhead and Brown Trout in the tributaries of the Salmon River, especially Trout Brook and Orwell Brook.
* Allow an opportunity for fish to reproduce naturally in the brooks.
* Allow adult fish to return to the Salmon River after spawning in the Brooks.
* Retain fish to maximize angling opportunity for both Brook and River anglers.

Proposal III:
Increase the minimum Size Limit on Steelhead from 21 inches to at least 25 inches.
Steelhead: Age 3, 4 and 5 fish generally account for 90% of the spawning fish each year. The average size of the Washington Steelhead in a run would be 6 pounds for age 3, 9 pounds for age 4, and 12 pounds for age 5 fish. Average weight, by length, for a Rainbow Trout (Steelhead) would be 5# 11oz for a 25-inch fish. For Steelhead returning to the Salmon River Fish Hatchery, age 3 is the first significant spawning age. The average size of age 3 males is 27 inches and females are 28 inches. The age 4 fish are a bit larger, but not by much. In order to protect first time spawning Steelhead from harvest, this data supports a minimum size limit of 28 inches.

The 2013 Fish Community Objectives for Lake Ontario endorsed Offshore Pelagic Zone Goal 2.5 - Maintain Rainbow Trout (Steelhead) fisheries. Status/Trend Indicator: maintaining or increasing population, recruitment, and growth of adult Rainbow Trout in selected tributaries (New York – Salmon River).

Proposal III Objective:
Allow an opportunity for these fish to spawn at least once before the possibility of harvest.
* Allow fish to grow to maturity.
* Retain fish to maintain or increase population.
* Increase genetic diversity.
* Provide for more varied age class recruitment.

Proposal IV:
Reduce the Daily Limit for Brown Trout from 3 Fish to 1 Fish.
Brown Trout: Brown Trout contribute to the fall fishery. Some from Lake Ontario make their way into the Salmon River and are taken, usually later in the fall, along with Steelhead. Brown Trout on the Salmon River were fairly scarce in 2015-16. In the fall of 2015 Brown Trout harvest in the Salmon River was 7%; the lowest in the four most recent fall surveys. In the past, the DEC also attempted to develop a population of resident Brown Trout to provide a summer fishery.

The 2013 Fish Community Objectives for Lake Ontario endorsed Offshore Pelagic Zone Goal - Maintain Brown Trout fisheries. Status/Trend Indicator: maintaining or increasing catch rates of Brown Trout in the lake and tributary fisheries.

Proposal IV Objective:
Maximize a limited resource.
* Retain individuals to provide increased populations, angling opportunity & genetic diversity.

Garrett Brancy - Tug Hill – Black River Trout Unlimited Chapter 589

25) I contact you today on behalf of Douglaston Salmon Run regarding the Draft Salmon River Fisheries Management Plan. DSR appreciates the opportunity review the draft plan and share the organization's perspective.

We acknowledge that the management plan must be strategically broad in scope in order to meet the fishery's needs in an ever-changing environment. That said, DSR believes the following list represents several of the specific items that are key factors to ensure a successful future of the Salmon River fishery.

A. Scope of the Management Plan

a. The plan's scope is 15 years. Some management objectives require near term attention in order have an effective outcome and positive impact on the future of the fishery. If left unattended for too long, some of the goals may reach a point of no return. Once the overall management plan is accepted, we ask DEC to select specific management objectives with the public's input, develop resulting timelines, and report on progress toward their achievement annually.

B. Angler Education

a. Make a serious effort to educate the public on angling ethics, fish identification, fish handling, and the like.

b. Serious effort is also needed to educate the angling public on access points and the delineation of where PFR's exist. Making this information available to the public will greatly reduce the instances of trespass and conflict with private landowners

C. Law enforcement

a. Increase the presence of law enforcement on the river to ensure the current regulations are adhered to. Improved enforcement will ensure the fishery isn't abused and allow all users to enjoy it for years to come

D. Greater protection for "white mouth" species.

a. Atlantic salmon

DEC has made great strides toward restoring a viable population of Atlantic salmon in recent years. However, until viable populations are established, enact a moratorium on the harvest of Atlantic salmon present in the Salmon River. Because Atlantic salmon are present in the Salmon River during the summer, the successful reintroduction of this species holds huge economic potential for the local community

b. Steelhead/rainbow trout

i. We strongly encourage DEC to increase the size limit on steelhead in the Salmon River to 25" as a measure to ensure enough spawning adults survive in years of catastrophe to meet the hatchery's egg take goals and so that more steelhead are present and remain present in the river to continue drawing anglers to our area.

c. Brown trout

Decrease the creel limit of brown trout in the Salmon River from 3 to 1. Brown trout are rare in the Salmon River yet their presence, even if increased slightly, may have a dramatic positive effect on anglers. On days when steelhead fishing is tough, often brown trout will continue to bite. The difference between catching no fish and catching a fish (especially a trophy brown trout) will make a big difference in encouraging an angler to return to fish the Salmon River in the future

i.
E. Habitat restoration
a. We encourage DEC to develop a plan for continuous evaluation and improvement of the aquatic habitat in the Salmon River. With the gradual widening of the Salmon River over time, habitat restoration has become an increasingly important means by which to ensure the successful future of the Salmon River fishery. Degraded habitat could result in a significant reduction in natural reproduction of the various salmonid species and result in a dramatic impact to the local economy should returns diminish
b. Habitat evaluation also includes the Salmon River head waters and the potential impacts of the proposed Mad River Wind Farm. Should the project come to fruition, we urge DEC to work with the developer in an effort to mitigate the damage by ensuring all standards and best management practices are adhered to

Finally, DSR would again like to express our thanks to Region 7 DEC for the opportunity to participate in the Salmon River focus group as well as the opportunity to comment on this Draft Salmon River Fisheries Management Plan.

Garrett Brancy – Douglaston Salmon Run

26) I contact you today regarding the Draft Salmon River Fisheries Management Plan. I greatly appreciate the opportunity review the draft plan and share my perspective. Being the manager of Douglaston Salmon Run, I have included many of the same comments as DSR shared in its letter as I personally endorse those them. However, in this letter I also include many of my own thoughts as an avid Salmon River angler and fishing guide.

I acknowledge that the management plan must be strategically broad in scope in order to meet the fishery's needs in an ever-changing environment. That said, I believe the following list represents some of the specific items that could be key factors or mechanisms to ensure a successful future of the Salmon River fishery.

A. Scope of the Management Plan
a. The plan's scope is 15 years. Some management objectives require near term attention in order have an effective outcome and positive impact on the future of the fishery. If left unattended for too long, some of the goals may reach a point of no return. Once the overall management plan is accepted, I ask DEC to select specific management objectives with the public's input, develop resulting timelines, and report on progress toward their achievement annually
B. Angler Education
a. Make a serious effort to educate the public on angling ethics, fish identification, fish handling, and the like. Improve the image of this world class fishery!
C. Law enforcement
a. Increase the presence of law enforcement on the river to ensure the current regulations are adhered to. Improved enforcement will ensure the fishery isn't abused and allow all users to enjoy

it for years to come. We have some great regulations at the current time but they are ineffective because they're not enforced on a regular basis.

D. Greater protection for "white mouth" species

a. Atlantic salmon

i. DEC has made great strides toward restoring a viable population of Atlantic salmon in recent years. However, until viable populations are established, enact a moratorium on the harvest of Atlantic salmon present in the Salmon River. Because Atlantic salmon are present in the Salmon River during the summer, the successful reintroduction of this species holds huge economic potential for the local community

b. Steelhead/rainbow trout

i. I strongly encourage DEC to increase the size limit on steelhead in the Salmon River to 25" as a measure to ensure enough spawning adults survive in years of catastrophe to meet the hatchery's egg take goals and so that more steelhead are present and remain present in the river to continue drawing anglers to our area. Anglers might get frustrated if they can't keep a fish but they won't go fishing if they can't catch a fish.

c. Brown trout

i. Decrease the creel limit of brown trout in the Salmon River from 3 to 1. Brown trout are rare in the Salmon River yet their presence, even if increased slightly, may have a dramatic positive effect on anglers. On days when steelhead fishing is tough, often brown trout will continue to bite. The difference between catching no fish and catching a fish (especially a trophy brown trout) will make a big difference in encouraging an angler to return to fish the Salmon River in the future

ii. I also support the stocking of lake run brown trout in the Salmon River. While there is the potential for browns to interbreed with Atlantic salmon, I'd prefer to see more browns even if it mean seeing a few Atlantic/brown hybrids

E. Habitat restoration

a. I encourage DEC to develop a plan for continuous evaluation and improvement of the aquatic habitat in the Salmon River. With the gradual widening of the Salmon River over time, habitat restoration has become an increasingly important means by which to ensure the successful future of the Salmon River fishery. Degraded habitat could result in a significant reduction in natural reproduction of the various salmonid species and result in a dramatic impact to the local economy should returns diminish

b. Habitat evaluation also includes the Salmon River head waters and the potential impacts of the proposed Mad River Wind Farm. Should the project come to fruition, we urge DEC to work with the developer in an effort to mitigate the damage by ensuring all standards and best management practices are adhered to

F. Salmon River Stamp

a. Having fished in many other states I find it odd that New York doesn't have a trout and/or salmon stamp. I would strongly advocate for a Salmon River stamp to raise money for Hatchery improvements, increased law enforcement, habitat restoration projects, acquisition of land or

PFR's, improved/increased boat launches, education, outreach, trash cleanup, annual creel census, facilitation of programs, and a whole host of other possibilities

G. Specialized Angling Sections

a. I believe creating a large catch and release only area from Pineville upstream to the route 52 bridge in Altmar could greatly improve angling opportunities for a more diverse constituency of anglers than the current fly only zones provide. In addition, it may expose more anglers to improved angling ethics

b. Perhaps another feature of a specialized section of the Salmon River would be an area accessed by permit only (similar to DSR but through the NYS) to create an experience with a limited number of anglers. Permit sales could be another means by which NYS could raise money for those items I mentioned under section "F" above. This limited access area could also be strategically placed in an area of the river where fish typically spawn to limit impacts on spawning fish

H. Guide Regulation

a. As a registered NYS guide, I strongly advocate for mandatory insurance requirements for all guides, increase license costs, and mandatory drug tests. I would also advocate for limiting the number of guides permitted to guide on the river

I. Drift Boat Regulation

a. As a NYS registered guide that utilizes a drift boat and a regular recreational angler that uses a drift boat, I advocate for the regulation of the number of drift boats on the Salmon River. I believe the number of boats could be regulated daily (and by day part AM/PM) by section floated based on the water flow. More water, more boats allowed. Less water, less boats allowed. Perhaps 70% of permits issued should be reserved for guides and 30% for recreational anglers. This program could be facilitated by funds from a launch fee or from a stamp

Finally, I would again like to express my deep thanks to the Region 7 DEC for the opportunity to comment on this Draft Salmon River Fisheries Management Plan. Garrett Brancy – Registered Guide

27) Looks good to me. What do you think about having local judges assign community service as the penalty for certain violations of law. These violators could be assigned to your ECOs for clean-up and simple maintenance activities. I would be willing to ask the County Legislature to waive tipping fees at the Pulaski transfer station for the disposal of waste collected through this process and delivered there by DEC personnel. - David Turner, Director Oswego County Department of Community Development, Tourism & Planning. (NOTE: Comment submitted regarding the "Lower Salmon River Restoration and Recreation Plan" but staff felt it was more applicable to this plan)

28) My comments (without seeing the plan): anything you can do to improve the safety of the area for fishermen and hikers would be great. I personally have pulled a drowning man out by the staircase area. this is a dangerous area on the north bank along the cliff. I realize what you are doing may disturb the fishing for a while but it will come back and be safer. - John Patterson

(NOTE: Comment submitted regarding the "Lower Salmon River Restoration and Recreation Plan" but staff felt it was more applicable to this plan)

29) Greetings, the purpose of this letter is to comment on your plans for the future of the Lower Salmon River area.
First of all, let me say this, I think you guys and gals of the NY DEC do a great job. I think the management of the Lake Ontario fisheries and the tributaries is great. And I thoroughly enjoy taking advantage of your hard work. Thank you. Thank you very much from a very satisfied "customer".
I've been fishing the Salmon River since the 80's. I fished in the lake for about 10 years but I had to move away from the area and no longer can afford to keep a boat. I have a lifetime Sportsman license and I make the trip from Brackney, Pennsylvania to the Pulaski area almost every weekend from September through April. As long as the river is wadeable. I am a diehard steelhead fisherman.
Because I spend so much time and money fishing the Salmon River I feel it is important to express my opinion on a few matters regarding future changes to river fishery. The first consideration in my mind is access. The river is so crowded with fishermen, that many times normal "sportsmanship" between anglers is not possible or just ignored altogether. It only takes one jerk to ruin an entire day for many people. My point is this, there are already more than enough people fishing there. Every single weekend. More places to park, right next to the river, in my mind is a nice idea. But if you put in new areas that weren't previously easy to get to…….you just ruined another good fishing spot. It will be inundated with anglers that are too lazy to walk far from the car. And never used to fish there. We don't need more fishermen. We need more room to fish between fishermen.
Improving trails along the river would help spread out the crowds that are trying to fish there. That is a great idea.
Doing something about the private development along the river is another big concern of mine. Pay to fish enterprises shouldn't exist, in my opinion. Those fish were born, raised, stocked, and cared for by you great NYSDEC folks. We already paid for those fish with our tax dollars. Granted, inconsiderate jerks, that litter and disrespect private property are a big problem. But in my mind if you want to improve the experience of fishing the Salmon River you need to keep the river banks accessible to all of us. Not just the rich guys.
The ideas of river bed and bank improvements in your plan are great. I have seen similar things built and they work.
Last and certainly not least is the quality of the lake. Please keep up the good work in maintaining that great fishery. The steelhead fishing this year is a perfect example of what your hard work can accomplish. The last two years, steelhead fishing on the Salmon River stunk. This year, thanks to your hard work, the fish are back. And back in good numbers. I really like that!!
A most sincere thank you - Jerry Homsher