



State of Washington  
**Department of Fish and Wildlife**

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February 27, 2008

Mr. Jerry Gutzwiler, Chair  
Washington State Fish and Wildlife Commission  
Washington Department of Fish & Wildlife  
600 Capitol Way N SE  
Olympia, WA 98501-1091

Dear Mr. Gutzwiler,

On February 2, 2008, the Fish & Wildlife Commission received public testimony for the DRAFT Statewide Steelhead Management Plan (SSMP). Though the DRAFT SSMP improved through the public comments received during the SEPA/EIS process that occurred in the late summer of 2007, public testimony received by the Commission identified three main areas that the SSMP should be further strengthened to add clarity and articulate commitment towards achieving the policy goals identified. The following information addresses the public testimony received, verbally and in writing, on the SSMP at the Commission's February meeting, as well as the Wild Steelhead Coalition (WSC) Independent Scientific Review document: "A Review of the Washington Steelhead Management Plan" submitted to the Commission during the February meeting.

Three main themes emerged either during public testimony or in the independent scientific review of the SSMP: 1) a perceived lack of emphasis towards the linkage between habitat and management strategies to ensure achievement of the habitat protection and restoration policy goal; 2) vagueness as to how specific strategies would be chosen at a watershed level; and 3) perceived reliance upon artificial production to support current and future fisheries, and the increasing uncertainty of hatchery programs to assist managers in reaching steelhead rebuilding goals.

**Stronger Habitat Emphasis**

The Department recognizes that our success in recovering wild steelhead populations in Washington State depends upon the protection and restoration of our habitat. Public testimony during the February meeting, as well as the Independent Science review conducted by the Wild Steelhead Coalition emphasized the need for the steelhead science

paper, the foundation to the SSMP to have a habitat chapter. The updated steelhead science paper, "Oncorhynchus mykiss: Assessment of Washington State's Anadromous Populations and Programs", includes a new habitat chapter, and this updated version was provide by department staff to Commission during the February meeting.

- The revised version of the science paper, the foundation of the SSMP, includes an entire chapter devoted to habitat and is tailored to each steelhead life history stage in response to the public comment received during the 2006 review of the science paper.
- The SSMP includes a habitat protection and restoration chapter that explicitly identifies the department will advance the protection and restoration of functional habitat through increased and focused technical assistance, implementation of a more efficient Hydraulic Project Approval (HPA) program and state fish passage laws, and exercising our authority under the Federal Power Act.
- The following strategies were subsequently added or clarified for emphasis in the SSMP:
  - 1) Expand the department's habitat influence by working with local citizens, concerned groups, tribes and other agencies in the development and improvement of habitat restoration and protection programs;
  - 2) Work with local governments and sister state agencies to improve the protection of steelhead habitat through consistent implementation of existing regulatory authorities
  - 3) Develop a climate change response plan to assess impacts of climate variations on steelhead in the environment of increasing uncertainties.
  - 4) Two new strategies and corresponding actions were added
    - The department will fully exercise its authority in setting in-stream flows through Department of Ecology to protect wild steelhead in the rivers and streams in which they inhabit,
    - The department will work with Department of Ecology to identify and designate Tier 3 or "outstanding resource waters" that provide protection from future water quality degradation.
  - 5) Action 1, page 10 of the SSMP identifies the development of a schedule for priority habitat protection areas and restoration projects based on Sub-basin planning, Limiting Factors analysis reports, and regional recovery plans.
  - 6) In the Regulatory Compliance chapter of the SSMP, the department recognizes that gaining compliance with existing and future regulations is essential in protecting and maintaining important habitat functions. Strategies 1 & 5, page 22, indicate improving enforcement of existing habitat regulations and increased consequences associated with noncompliance through penalties associated with illegal actions.

### **Detailed Information for Watersheds**

The department has chosen a tiered approach for achieving success in the implementation of steelhead management. Phase 1 was the development of a scientific foundation as reflected in the steelhead science paper. Phase 2 involved development of the SSMP in coordination with an Ad Hoc Steelhead Stakeholder Group. The SSMP is designed to provide a framework of policies, strategies, and actions for steelhead management throughout Washington State. Phase 3, the final step, involves development of detailed regional management plans tailored to the unique needs of each watershed and region.

The timeframe for development of the regional management plans is articulated in the "Introduction" section of the SSMP and identified to occur in the next 24-36 months. These regional management plans will also be subject to the SEPA process. Much of the public testimony during the Commission meeting focused on specific local areas, and recognition of the broader statewide steelhead needs was not acknowledged. One size does not fit all. Important considerations relative to the SSMP and its broader statewide context though include:

- The variable abundance, federal listing designations, and progress towards recovery of steelhead populations across the state. The SSMP was designed to establish policies applicable statewide, as well as lay a framework of strategies and actions that when implemented will provide for the protection and rebuilding of wild steelhead.
- The SSMP was designed to set a baseline for management actions affecting wild steelhead populations. Regional management plans may take a more conservative approach but they cannot do less than what is identified in the SSMP if adopted.
- Each regional management plan will act as a supplement to the SSMP and undergo individual SEPA process.

### **Perceived Reliance on Artificial Production**

The department recognizes that artificial production can be divisive, particularly as it relates to wild steelhead populations. Artificial production, in and of itself will not rebuild or recovery wild populations. However, artificial production that operates consistent with hatchery reform does represent a way in which the department can provide sustainable fishing opportunity while wild populations rebuild commensurate with improvements in habitat.

In response to the public testimony received during the Commission meeting, the following changes or additions were made to address concerns:

- The Department revised the Artificial Production policy to clarify the role hatchery programs carry out in management of wild steelhead populations. The policy now reads: "Artificial production programs in themselves cannot assure achievement of rebuilding and sustaining wild populations and, improperly implemented, can pose risks to wild populations. Promote the achievement of the

natural production policy and provide fishery-related benefits by implementing artificial production programs as a component of a comprehensive habitat, hydro, harvest, and hatchery strategy, and by assuring artificial production programs meet the following characteristics:

**Conservation Programs.** Artificial production programs implemented with a conservation objective shall have a net aggregate benefit for the diversity, spatial structure, productivity, and abundance of the target wild stock.

**Harvest Programs.** Artificial production programs implemented to enhance harvest opportunities shall provide fishery benefits while allowing watershed-specific goals for the diversity, spatial structure, productivity, and abundance of wild stocks to be met.

- The SSMP includes the establishment of wild stock gene banks in which wild stocks are largely protected from the effects of artificial production. **The SSMP identifies for at least one wild stock gene bank to be established within each Management Unit within each Distinct Population Segment throughout the state (SSMP, strategy 3, page 6).** Though the department is keenly aware through public testimony of the interest to identify in this process those populations that represent wild stock gene banks, department staff believes public input at the watershed level is likely to provide the most balanced approach towards achieving long-term goals for conservation and sustainable fisheries.
- The development of the SSMP followed the principles of cross discipline coordination and integrated decision making as reflected in the 21<sup>st</sup> Century Salmon and Steelhead project. Fish and Habitat program staff worked closely together during the development of the SSMP and subsequent SEPA process. Influence of the 21<sup>st</sup> Century Salmon and Steelhead project can be seen in the interdisciplinary strategies and emphasis on integrated management actions relative to wild fish

The SSMP, scheduled for adoption by the Commission at the March meeting, has benefited greatly by the thoughtful and explicit public involvement from development of the SSMP with the ad hoc stakeholder group, public comments received during the SEPA process, and the testimony given at the February Commission meeting. Department staff values the opportunity to present at the March Commission meeting the staff recommendations for adoption of the policies associated with the Statewide Steelhead Management Plan.

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If you have any questions or need further information regarding the final SEPA document, the SSMP or this response, please feel free contact me at (360) 902-2662; email [bartlhrb@dfw.wa.gov](mailto:bartlhrb@dfw.wa.gov).

Sincerely,

A handwritten signature in black ink that reads "Heather Bartlett". The signature is written in a cursive style with a large, stylized initial "H".

Heather Bartlett  
Salmon and Steelhead Division Manager

Enclosure

cc: Fish and Wildlife Commission  
Lew Atkins, Assistant Director Fish Program  
Jo Wadsworth, Deputy Assistant Director  
Jim Scott, Former Chief Scientist  
Amilee Wilson, ESA Response Unit Lead  
Bob Leland, Steelhead Program Manager  
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