

SUPPLEMENTAL INFORMATION

Please add the following pages

After page 8

of Commission meeting materials

June 5-6, 2009
Fish and Wildlife Commission Meeting
Olympia

**PROPOSED COMMISSION POLICY ON HATCHERY AND FISHERY
REFORM – BRIEFING AND PUBLIC HEARING**

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WDFW

Public Comments

Draft Hatchery and Fishery Reform Policy C-3619

**Compiled by Andy Appleby
WDFW
Hatcheries Division
6/3/2009**

Public Comment Received on Draft hatchery and Fishery Reform Policy

Comment 1)

From: Bruce Padgett

Sent: Wednesday, May 13, 2009 2:58 PM

To: Commission (DFW)

Subject: Hatchery draft

I feel that your draft is wrong and that this state is wrong about the hatchery's and personal run them. I worked at a hatchery for nine months and what you all have planned is not for the good of the fish or anybody else, as long as the State personal in Olympia sit on there butts and do not none how to run hatchery or care for fish, except out of a book. Most State bios have no clue on how to care for fish either. I believe that the State wants to close most of the Hatchery's? I would also like to say that commercial fishing should not be allowed above Astoria Bridge! The Cowlitz Indians should be allowed to take over some hatchery's, because this State cannot do it right.

Thank You
Bruce Padgett

Comment 2)

From: Brett Wedeking

Sent: Wednesday, May 13, 2009 3:59 PM

To: Commission (DFW)

Subject: Re: Public comments sought on proposed hatchery and fishery reform policy

Dear Commission,

I just received an email from WDFW concerning hatchery reform in Washington. I am a steelhead and salmon angler and I generally support the notion of fewer hatchery fish plants and returning river systems to wild only runs. However, I also support continued angling opportunities and common sense. There are plenty of watersheds and river systems that would benefit from eliminating hatchery production completely. The Sauk/Skagit and Hoh rivers come to mind as examples. They actually have wild steelhead and salmon runs left to save and have generally intact watersheds with spawning habitat. Please, stop planting hatchery fish in those systems and others like them, stop allowing the harvest of any wild salmon or steelhead and stop netting anywhere near the mouths of these rivers. Let the fish have a chance to recover. Even close them to all angling/netting for a few years and see what happens.

However, there are rivers that are pretty much lost causes. My home water, the Snoqualmie river, is pretty much a lost cause below the falls. There are at least half a dozen of golf courses along it pumping in fertilizer, thousands of homes, highways with water run off and the river has been channelized in many places. Suitable spawning habitat is minimal and the fish runs are struggling. Traditionally WDFW has planted hatchery steelhead in the Snoqualmie that provide angling opportunity almost every month the river is open but in a misguided attempt to restore steelhead populations WDFW is planning on eliminating the river's hatchery plants. The native, winter run of steelhead is in bad shape, if it still exists at all and WDFW is proposing the elimination of winter hatchery plants. That I can understand, kind of because there actually was a run of native, winter steelhead historically. My major problem with the hatchery reform plan as it applies to this river is that

there were never any native summer run steelhead that returned up river of the Tolt. The hatchery steelhead though run all the way to the falls and. Now WDFW is trying to eliminate them and close the Tokul Creek hatchery in a supposed effort to help wild steelhead. Do you see the problem? There never were summer steelhead above the Tolt until we put them there! So there's no reason to stop planting hatchery summer steelhead. Let us fish!

And, what's even better is WDFW, to mitigate angling opportunity, proposed to increase hatchery production on the Skykomish river so anglers could catch more fish there. Now what's wrong with this? Well, why is it bad for the Snoqualmie to have hatchery fish but okay for the Skykomish? Shouldn't it be the opposite? The Skykomish is a much more intact watershed with miles and miles more spawning habitat and more wild fish returning. The Snoqualmie, remember, is kind of a ditch. The plan doesn't make any sense, at all. So why on earth would WDFW propose further screwing up a fairly intact watershed and saving a destroyed one? I don't get it.

If WDFW wants to save salmon and steelhead runs they need to identify the viable ones worth saving and do it. Severly restrict angling and netting anywhere near these waters. And take rivers like the Snoqualmie and as another example, the Cowlitz, and pump them full of hatchery fish to give anglers more opportunity to fish while leaving other runs alone. This way more people are happy and WDFW would actually be doing something proactive and real to save endangered runs. It's not complicated we just need action.

Thank you,

Brett Wedeking

Comment 3)

From: Stuart Turner

Sent: Wednesday, May 13, 2009 7:41 PM

To: Commission (DFW)

Subject: Comments: Proposed hatchery and Fishery Reform Policies

To whom it may concern:

If the intent of the regulations is truly to get more selective opportunities to harvest abundant hatchery fish, then there MUST be an ABSOLUTE policy that ALL HATCHERY FISH ARE IN FACT MARKED WITH ADIPOSE FIN REMOVAL. As I have several good friends "in the business" I am aware that there have been large numbers of "Hatchery" fish that have not been marked/fin clipped in the past. The only way a "Selective" fishery will work is with the full cooperation of ALL PARTIES, including the tribes. Since this is like all regulations, basically self enforced, self compliance (fewer than 1% of all fisher persons are checked annually by enforcement) you must the the full goodwill and confidence of the public on this key issue. MARK ALL THE FISH FROM HATCHERIES ALL THE TIME NO EXCEPTIONS.

People are not fools. If you try to play them, they will throw every fish caught in the icebox in retaliation, and pay the occasional fine when caught.

The real downside of this entire proposal is the complexity of the regulations is getting to the point where even a college graduate may have a hard time reading and keep up with the regs....The more complex it gets, to a degree, the lower participation from the general public. I prefer area regs that are CONCISE and CLEAR....use the email system for emergency closure when the predetermined harvest is reached.

One final point, I think there are more harvestable sea run cutts in Puget Sound than the current, and indeed now long standing NO HARVEST policy would indicate. I am for a short "keep" season, even with a slot limit or annual 3-5 fish limit. This is a resource not being fully and fairly utilized but the long term CAR fishery now in place.

Thank you for your consideration of my comments to the proposals.

Stuart Turner

08b_Public Comment
June 5-6, 2009, FWC Meeting

Comment 4)

Native Fish Society Portland, Oregon 97219

Conserving biological diversity of native fish and protecting their habitats

May 18, 2009

Washington Department of Fish and Wildlife Commission
600 Capitol Way North,
Olympia, WA 98501-1091

RE: COMMENTS ON THE WDFW DRAFT 2 HATCHERY POLICY

The following is a copy of the WDFW Draft Hatchery Policy and I have added language to this policy and deleted some original language in the process. The purpose is to develop a policy that is more specific while being consistent with the intent of the policy to serve a conservation purpose. All of my additions are in red type.

Definition and Intent

Hatchery reform is the scientific and systematic redesign of hatchery programs to help recover wild salmon and support sustainable fisheries. The **primary purpose** of hatchery reform is to **establish objectives for each hatchery that protects native wild salmonid reproductive fitness, controls ecological impacts, and maintains their reproductive success. Consistent with this primary purpose,** improve hatchery effectiveness, ensure compatibility between hatchery production and salmon rebuilding programs, and support **cost effective** fisheries.

Note: By cost effective I am referring to the cost to produce a fish in the harvest. The Independent Economic Advisory Board for the Power Planning Council evaluated selected hatcheries in the Columbia River from the lower river to the upper river. I add this because the public pays for hatchery production yet there is seldom a transparent cost to catch accounting provided to show the effectiveness of the public funds used to subsidize the various fisheries. This report can be found at: http://www.nwcouncil.org/library/ieab/ieab2002-1_part2.pdf

General Policy Statement

The Washington Department of Fish and Wildlife (Department) shall promote the conservation and recovery of wild salmon and steelhead and **then** provide fishery-related benefits by implementing artificial production programs with the following characteristics:

Conservation Programs. **All** artificial production shall **provide each wild salmonid population in each watershed the necessary** diversity, spatial structure, productivity, and abundance of the target wild population.

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

Commercial and recreational fisheries **shall** harvest abundant hatchery fish. **The** Department shall implement mark selective salmon and steelhead fisheries, unless the wild populations affected by the

fishery are meeting spawner and broodstock objectives. **Compliance monitoring shall be conducted annually and adjustments made in the next year for any deficits in achieving objectives.**

In addition, the Department may consider other management approaches provided they are as or more effective than a mark selective fishery in achieving spawner and broodstock management objectives.

2) Use the principles, standards, and recommendations of the Hatchery Scientific Review Group (HSRG) **as the standard by which** the management of hatcheries by the Department **shall be operated consistent with the ESA, and protective of other wild native salmonids**

3) The Department **shall** prioritize improved broodstock management to reduce the impacts of hatchery fish **to specific levels for each affected wild population** and **achieve specific** fitness and viability **objectives for each wild natural population.**

4) The Department shall designate streams for the exclusive management for wild salmonids in each region. These watersheds and species shall be managed to protect the abundance, productivity, spatial diversity and biological diversity of wild native salmonids. In rivers where hatchery fish of one species is released does not preclude the management of other species under the wild salmonid policy. For example Wind River summer steelhead are managed as a genetic reserve even though hatchery spring chinook are released into this river.

Develop an action plan that systematically implements hatchery reform as part of a comprehensive, integrated (All-H) plan for meeting **recovery**, conservation and harvest **objectives** at the **population, (a population is an indigenous species locally adapted to the watershed)** watershed and Evolutionarily Significant Unit (ESU) levels, including an action plan that systematically implements hatchery reform. For programs affecting the wild populations and recovery, the plan will include goals with the following elements:

a) Integrated programs implemented to enhance harvest opportunities (i.e., integrated harvest program) **(what is an integrated harvest program?)** will achieve a proportionate natural influence (PNI) equal to or greater than 0.70 **(explain the conservation value of this metric)** on average, use hatchery practices that reduce the risks of domestication **that meet specific criteria**, and use broodstock that is indigenous to the watershed.

Note: spawner abundance for each wild population reported annually against spawner abundance objectives is the best way to determine whether the agency policy is being achieved. The ratio of hatchery to wild spawners in natural production areas must be determined annually so that the public and others can determine whether the objective of naturally spawning hatchery fish has been achieved. According to recent research, the proportion of naturally spawning hatchery fish is equal to the reduction in wild spawner reproductive success (Mark Chilcote, ODFW, personal communication). The goal should be zero naturally spawning hatchery fish. If there are naturally spawning hatchery fish the agency shall prevent naturally spawning hatchery fish in the next year. The HSRG views PNI as a way to reduce impacts if there are naturally spawning hatchery fish with wild fish. It is not the intent of HSRG to manage for a specific fraction of naturally spawning hatchery fish. The Department should adopt specific criteria for allowing a hatchery fraction to spawn naturally with wild fish. The effect shall be evaluated and based on findings adaptive management used to make management adjustments.

b) Segregated programs implemented to enhance harvest opportunities (i.e., segregated harvest program) will result in an average gene flow of less than 2% from the hatchery to the wild population.

Note: The agency cannot measure gene flow in a timely manner so this rule provides no conservation advantage. The rule should read that segregated harvest programs shall prevent

naturally spawning hatchery fish in target and non-target rivers with the purpose of allowing no hatchery fish to spawn naturally with wild fish.

Both sections (a) and (b) place the burden of risk from the hatchery program on the wild populations. It is time that the burden of risk not be placed on wild salmonids but on the artificial production program to verify it is reducing the reproductive success and productivity of wild native salmonids.

c) Integrated conservation programs will be implemented to minimize genetic divergence between the hatchery broodstock and the wild population and to maximize PNI (ideally at least 0.70). (Delete the escape clause:) However, PNI in the initial stages of the program will depend on the degree extinction risk and logistical challenges with the goal of the PNI being as high as practical.

Note: Again let me state the purpose of HSRG is to minimize impacts on wild populations from naturally spawning hatchery fish not to allow a certain fraction of the naturally spawning fish to be of hatchery origin. The purpose of PNI is to make sure that if hatchery fish do spawn naturally, they will do less harm. The purpose is to prevent naturally spawning hatchery fish and harm to wild native salmonids.

5) Externally mark all artificial salmon and steelhead production that is intended to be used for harvest unless the production is explicitly excluded through state tribal agreements signed by the Director and the appropriate tribal government(s). Federal law passed by Norm Dicks instructs fish raised in federal hatcheries to clip all hatchery fish even when those hatcheries are operated by WDFW. How is this in compliance with federal law?

Sincerely,

Bill M. Bakke

Comment 5)

Dear WDFW,

I am concerned and troubled by a hatchery practice over the years that has left our river systems and watershed sterile from nutrients provided by fish carcasses. Many of my friends are aware of the practice of the state hatcheries selling the fish that is processed at hatchery to outside company's in Canada. More of the public needs to be aware of this problem and were there tax dollars are going.

These fish are paid for by State taxpayers and they should not be sold off to outside interests. Our river systems suffer greatly from this practice as well as our fisheries. Many studies have been done to confirm this issue. This subject has also been brought to WDFW on more than one occasion.

Will we see changes in this practice as part of Hatchery Reform? Bais Biology 101

I look forward to your response and follow up through email and NOF meetings.

Gary L Johnson

Comment 6

WDFW DRAFT 2 HATCHERY POLICY

Comments

By

Wild Salmon Rivers

Peter W. Soverel

May 20, 2009

See Wild Salmon Rivers comments below in red on the WDFW Draft 2 of Hatchery Policy

Definition and Intent

Hatchery reform is the scientific and systematic redesign of hatchery programs to help recover wild salmon and support sustainable fisheries. The **primary purpose** of hatchery reform is to **establish objectives for each hatchery that protects native wild salmonid reproductive fitness, controls ecological impacts, and maintains their reproductive success. Consistent with the primary purpose** improve hatchery effectiveness, ensure compatibility between hatchery production and salmon rebuilding programs, and support **cost effective** fisheries.

General Policy Statement

The Washington Department of Fish and Wildlife (Department) shall promote the conservation and recovery of wild salmon and steelhead and **then** provide fishery-related benefits by implementing artificial production programs with the following characteristics:

Conservation Programs. **All** artificial production shall **provide each wild salmonid population in each watershed the necessary** diversity, spatial structure, productivity, and abundance of the target wild population.

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

Commercial and recreational fisheries **shall** harvest abundant hatchery fish. **The** Department shall implement mark selective salmon and steelhead fisheries, unless the wild populations affected by the fishery are meeting spawner and broodstock objectives. **The Department shall conduct compliance monitoring annually and adjust practices for the next year for any deficits in achieving objectives.**

In addition, the Department may consider other management approaches provided they are as or more effective than a mark selective fishery in achieving spawner and broodstock management objectives.

2) Use the principles, standards, and recommendations of the Hatchery Scientific Review Group (HSRG) **as the standard by which** the management of hatcheries by the Department **shall be operated consistent with the ESA.**

3) The Department **shall** prioritize improved broodstock management to reduce the impacts of hatchery fish **to specific levels for each affected wild population** and **achieve specific** fitness and viability **objectives for each wild natural population.**

Develop an action plan that systematically implements hatchery reform as part of a comprehensive, integrated (All-H) plan for meeting **recovery**, conservation and harvest **objectives** at the **population**, watershed and Evolutionarily Significant Unit (ESU) levels, including an action plan that systematically implements hatchery reform. For programs affecting the wild populations and recovery, the plan will include goals with the following elements:

a) Integrated programs implemented to enhance harvest opportunities (i.e. integrated harvest program) **that will achieve a proportionate natural influence (PNI) equal to or greater than 0.70 based upon a running five year average**, use hatchery practices that reduce the risks of domestication **that meet specific criteria**, and use broodstock that is indigenous to the watershed.

The Department shall measure spawner abundance and source (i.e. wild or hatchery origin) for each wild population annually against wild spawner abundance objectives to determine whether the objective of naturally spawning hatchery fish has been achieved. The hatchery program shall be managed with the goal of zero naturally spawning hatchery fish. If there are naturally spawning hatchery fish, the agency shall develop practices to prevent naturally spawning hatchery fish in the year class. NOTE: The HSRG uses PNI as a way to measure the impacts of naturally spawning hatchery fish with wild fish. The HSRG does not propose to manage to a specific fraction of naturally spawning hatchery fish. The current WDFW formulation of PNI is upside down placing the risk on wild populations rather than avoiding that risk.

b) Segregated programs implemented to enhance harvest opportunities (i.e. segregated harvest program) will result in an average gene flow of less than 2% from the hatchery to the wild population.

Since the agency cannot measure gene flow in a timely manner, the rule should specify that segregated harvest programs shall prevent any naturally spawning hatchery fish in target and non-target rivers.

c) Integrated conservation programs will be implemented to minimize genetic divergence between the hatchery broodstock and the wild population and to maximize PNI (ideally at least 0.70). However, PNI in the initial stages of the program will depend on the degree extinction risk and logistical challenges with the goal of the PNI being as high as practical.

d.). Conduct annual reviews of all hatchery programs against the above described objectives adjusting practices to insure these programs are meeting the stated goals. The Department shall terminate those programs which fail to meet goals for any three consecutive years.

5) Externally mark all artificial salmon and steelhead production that is intended to be used for harvest unless the production is explicitly excluded through state tribal agreements signed by the Director and the appropriate tribal government(s). **Note: Federal law requires clipping all fish raised in federal hatcheries even when those hatcheries are operated by WDFW. The Department shall insure compliance.**

Comment 7)

From: Curt Kraemer

Sent: Wednesday, May 20, 2009 1:40 PM

To: Commission (DFW)

Subject: Policy #C-3619 comments

Fish and Wildlife Commissioners -

Thank you very much for the opportunity to comment on the Draft hatchery and fishery reform policy - Policy number C-3619.

This is welcome addition to the guidance policies for the management of salmonid resources of this State. I applaud both the commission and WDFW staff for this important step forward in the scientific management of the resource. However I do have several comments that I believe will strength the policy.

1) This policy would benefit if the **Purpose** section were re-written as follows -

The purpose of this policy is to advance the conservation and recovery of wild salmonids (inlcuding salmon, steelhead and the various trout) by promoting and guiding the implementation of hatchery reform

2) Re-write the **Definition and Intent** section as follows -

Hatchery reform is the scientific and systematic redesign of hatchery programs to help maintian health wild salmonid populations, to promote the recovery of ESA listed salmonids while supporting sustainable fisheries.

3) Re-write the **General Policy Statement** section as follows -

The Washington Department of Fish and Wildlife (Department) shall promote the conservation and recovery wild salmonids and provide fishery-related benefits where appropriate by implementing artificial production programs with the following characteristics: ...

4) **Policy Guidelines** -

Item # 4 of the Policy guidelines does not cover all the major interactions of integrated/segregated programs with the wild resource. Specifically I'm think of a couple different cases. The first is where an integrated program is less than well integrated with the natural population. As I understand the HSRG's thinking and recommendations a successful or well integrated hatchery program is one that both is able to achieve a PNI equal to or greater than 0.70 and whose brood stock is representative of the wild population with which it is integrated. A representative brood stock would be one that substantially captures the diversity found in the natural population. Some of the characteristics of the diversity found in the natural population that would typically be included things like run timing, spawn timing, age and size struture, the various life histories, found in the natural spawning population.

The second is the case where an adults from an integrated program also interact with a second stock

different from that which the hatchery brood stock is integrated with. This most often happens in two cases; one where more than one stock of a species is found in the same basin. A couple Puget Sound Chinook examples illustrates my concern. In the Nooksack basin the adults from the integrated North Fork early population are interacting with the South Fork early stock. This are two different stocks and the natural spawning South Fork fish are being "swamped" with spawning adults from the North Fork program as well as fall fish from the Samish program (out of basin production). The interaction of adults from a large hatchery program from a nearby basin interacting with a smaller wild stock in a nearby basin is the second example of my concerns. Another example of this type of interaction would be fall hatchery Chinook from the Skokomish basin with the NORs in the mid-Hood Canal population (Duckabush, Dosewallips, and Hamma Hamma Rivers).

I believe that a strict read of HSRG guidelines that the above examples would be considered to segregated problems. Regardless I believe that the policy guideline # 4 would be strengthened with the addition of a four item that explicitly identifies such programs as segregated programs. A potential working for d) might be -

d) Integrated programs implemented to enhance harvest opportunities whose returning adults interact on the with two or more stocks of the same species (at least one of which is not integrated with that hatchery program) will be considered to be a segregated program resulting in an average gene flow of less than 2% from the hatchery program to those non-integrated population(s) and achieving a PNI of at least 0.70 for the integrated population. Similarly attempts at an integrated program implemented to enhance harvest opportunities whose brood stock is not representative of the wild population will be considered to be a segregated program.

Sincerely,

Curt Kraemer

Comment 8)

From: Mike Genson

Sent: Friday, May 22, 2009 9:19 AM

To: Commission (DFW)

Subject: Comment on salmon and steelhead hatchery reform

Hatchery salmon, steelhead and other trout are a vital resource to our state. The economic benefits from these programs cannot be over-stated. Many areas of our state depend on hatchery produced fish to sustain a significant portion of their economies, as does the State itself. While I do support efforts to maintain populations of wild or native fish, it should not be done at the expense of hatchery programs. Our sport fishery depends on successful hatchery programs not on wild fish runs. I urge you to maintain present hatchery programs at this time, and to work towards improving and increasing hatchery programs in the future. Washington will remain THE PLACE to come for a quality salmon and trout fishing experience if we do this.

Very Sincerely,

Michael K. Genson

Comment 9)

From: Logan (Schuyler) Dunphy
Sent: Saturday, May 23, 2009 12:21 PM
To: Commission (DFW)
Subject: proposed hatchery and fishery reform

WDFW:

I am writing to comment on the proposed hatchery reform document. I have a number of criticisms:

1. There is far too much reliance on hatchery broodstock programs. These threaten the viability of wild stocks by mining their gametes, effectively removing wild fish from the population (often less than healthy populations). In doing so we remove natural and sexual selection from these now domesticated individuals which likely explains their reduced fitness that has been observed in just one generation. I do not see any role for broodstock hatcheries unless it is an emergency situation to save almost extinct stocks.
2. There is an insufficient reduction in the number of hatchery fish released annually. Hatchery smolts outnumber wild fish by orders of magnitude in the stream and marine environment. This increases competition and predation on wild fish. I often hear from managers that ocean conditions are limiting the productivity of wild runs. If that is the case, which I believe it is, why are we increasing competition in this highly limiting environment? We know wild fish survive at a higher rate at sea the hatchery conspecifics, so why don't we maximize the number of wild ones to get a bigger wild return? I think we need to shut down many hatcheries and reduce hatchery releases by orders of magnitude to release wild stocks from undue competition with hatchery fish.
3. There are insufficient wild fish refuges. Rivers like the Skagit should not receive hatchery plantings. Those releases limit productivity of wild fish, as explained in #2, and explain why some habitat is not utilized in the river. The healthy habitat ought to support more wild fish.

I think there is a lack of recognition that wild fish offer the only hope for salmonids to adapt to a changing climate and human induced habitat alterations. All research says hatchery programs induce reduced fitness on those domesticated and that the wild fish suffer due to increased competition and predation. Thus, hatchery fish threaten today's and tomorrow's fisheries in Washington state.

Logan (Schuyler) Dunphy

Comment 10)

From: David Neault
Sent: Monday, May 25, 2009 6:23 AM
To: Commission (DFW)
Subject: POLICY TITLE: Hatchery and Fishery Reform

In reading the proposed policy I only have a few concerns:

Under guideline 5 it states that the intent is to mark all fish intended to be used for harvest. Since I have seen many situations where significant numbers (>200,000) are not marked so they can be used for rate of return studies how will the commission address the intended to be used for harvest wording to ensure such excesses are not allowed.

The marking studies I noted were done at a tribal hatchery. Will the tribes be agreeing to similar restrictions on their marking of hatchery produced fish? Will they be following the HSRG's proposals as well on separation of 'pure' genetics fish vs. hatchery stock? Is there a process by which the state and tribes will be agreeing to follow the same goals?

Will more marking trailers be available so that peak marking periods can be met so fish are no longer released unmarked/untagged due to time constraints? Thank You. David Neault

Comment 11)

From: Scott Rockey

Sent: Tuesday, May 26, 2009 1:55 PM

To: Commission (DFW)

Subject: Comments on Hatchery Reform

Hello Commission:

My comments are directed at Policy Guideline #2 and 4.

ALL hatchery raised Salmon and Steelhead need to be marked. Not marking Salmon or Steelhead that were released from a hatchery identifies them as being wild, which they are certainly not, and shouldn't be mistaken as such.

The % of Salmon returning to hatcheries that are used for nutrient enhancement should be increased. The returning Salmon contain nutrients vital to the ecosystem, these nutrients would increase the nutrient levels in the streams therefore increasing the biotic potential of aquatic organisms. If the potential was to increase, the hatcheries would be able to release more Salmon, which would benefit everyone.

Release more Salmon. The cost of increasing hatchery productivity is minimal. The cost of hatcheries is in the man hours and the machinery. If a hatchery is at 50% capacity it would not cost much more to have it run at 100% capacity. More Salmon means more opportunities for fishermen who spend more money in the local economies to go fishing. Commercial fishermen catch more Salmon, make more money and spend the increased dollars in their local economies. The production is relatively cheap, the potential for economical significance is great.

Thank you for your consideration.

Scott Rockey

Comment 12)

From: William Atlas

Sent: Tuesday, May 26, 2009 8:09 PM

To: Commission (DFW)

Subject: hatchery policy comments

Fish and Wildlife commissioners,

I am writing you today to express my concerns about the proposed hatchery reform document open for public comment. While I am pleased that our state has begun to acknowledge the need for hatchery reform, the current document fails to go far enough to protect wild fish from the effects of large scale hatchery programs. First, the policy going forward appears to rely more heavily on wild broodstock or integrated programs. I am extremely wary of these proposals and I don't believe we as a state should be expanding them. Removing wild fish from a population in order to provide harvest opportunity is dangerous for the future of wild fish in our state, particularly with so many populations failing to meet their escapement goals and recent federal listings. A large body of scientific research has highlighted the fact that domestication can rapidly reduce the fitness and performance of hatchery fish in the wild. The supposed benefits of a wild broodstock is that they don't limit the productivity of the wild population and provide a higher number of spawning fish, however any program managed with the foremost goal of providing harvest opportunity will fail to accomplish that goal and may undermine the existing wild population.

My second concern is the failure to address the ecological effects of hatchery fish. While it is generally recognized that having large numbers of hatchery fish spawning with wild stocks is

undesirable, we tend to ignore the obvious ecological impacts of hatchery programs. In general the number of smolts released into a watershed is based on the number of returning adults desired rather than any understanding of the ecosystems capacity. Furthermore many hatchery smolts residualize in freshwater, often in very high densities. These fish compete with wild parr for habitat and resources and prey heavily on ESA listed Chinook and Steelhead fry as well as Coho. Many times I have snorkeled the miles below an a hatchery release site and seen thousands of residualized smolts, undoubtedly these fish are severely limiting productivity in the area were they exist in high densities. Large hatchery programs also support large numbers of fish, avian and marine mammal predators. These communities are likely out of balance with the wild fish populations and may impact wild smolt survival severely.

I am also disappointed that the hatchery policy document makes no mention of wild fish refugia. If we are committed to recovering and maintaining strong populations of wild salmon and steelhead it is essential that we set aside some of our stronger watersheds. We should prioritize protecting high quality watersheds across a range of stream types and regions in order to ensure that the diversity of salmonid populations are protected. In doing so these populations will be able to adapt and persist without further hindrance from hatchery supplementation. While I acknowledge the societal demand for hatchery supported harvest opportunity, this should be the exception rather than the rule. Certain highly degraded systems are ideal for these types of programs because of their inability to support viable wild populations. The Cowlitz is an excellent example of this and currently supports on of the most popular and successful hatchery fisheries in the state. Watersheds such as the Hoh, Skagit, Quillayute, North, Naselle, Queets, Hoko and Klickitat are excellent examples of areas which would benefit from protection as wild fish refugia. They represent some of the best remaining habitat in our state and their respective regions and are capable of supporting strong, diverse populations of wild salmonids if we set them aside as refuges.

I would like to point out the collapse of ocean survival in Puget Sound, particularly for wild steelhead. Populations in the Southsound and Hood Canal have suffered severe declines over the last two decades. Puget Sound is a confined glacial basin and is one of the most heavily supplemented areas in the entire state. With such massive numbers of hatchery fish entering the sound annually we are very likely exceeding its capacity and we are certainly altering the natural community dynamics in the sound. As a consequence, both wild and hatchery smolts perform very poorly with ocean survival below 1% for many hatchery steelhead programs. I believe we are headed in the right direction by changing our management objectives to emphasize parameters associated with strong diverse populations. However it is critical that we acknowledge the full impact of our hatchery programs and work to protect our best wild systems.

We are at a crossroads as a society, four decades of intensive hatchery supplementation has failed to provide the quality fisheries we once believed they could. It is time to reconsider the role of hatcheries in our states fisheries and through focused, science based hatchery reform we can continue to support popular harvest fisheries while protecting many of our states legacy of wild salmon and steelhead.

Sincerely,

Will Atlas
FFF Steelhead Committee , VP of Communications

Comment 13)

From: Ryan Nathe

Sent: Tuesday, May 26, 2009 9:31 PM

To: Commission (DFW)

Subject: Hatchery and Fishery Reform

To Whom it may concern:

It seems irresponsible to take broodstock from depressed salmonoid runs to seed hatcheries with fish that will ultimately be used for consumption. It is time the WDFW abandons its philosophy of 'hatcheries are the answer'. If this were true than we would not be faced with such dismal runs. The state should sacrifice a few rivers to catch and keep fisheries. What I mean by sacrifice is, increase hatchery production to its maximal levels on these few rivers and abandon token efforts to restore wild steelhead in these rivers. For example the Cowlitz. This river is so broken that it should be managed as a put and keep river. Increase hatchery fish in the river, allow bait and barbed hooks, allow fishing from boats and allow a generous limit. This will allow people who want to harvest fish to do so. Other rivers should be managed as catch and release. No bait, no barbs, no fishing from boats, and no steelhead retention. In this way we would lose a handful of rivers to meat fisheries, but we would preserve all the rest and we can stop with token efforts to restore virtually extinct runs on these broken rivers and reallocate those funds to other rivers that stand a chance of maintaining native runs. Use the money that would be allocated to hatcheries to preserve and restore spawning habitat.

Ryan Nathe

University of Washington '09

New York Medical College '13

Comment 14)

June 1, 2009

TO: Washington Fish and Wildlife Commission

FROM: Puget Sound Recreational Fisheries Enhancement Oversight Committee

SUBJECT: Proposed Hatchery and Fishery Reform Policy Comments

The Puget Sound Recreational Fisheries Enhancement Oversight Committee (PSRFEOC) applauds the Commission for developing a Hatchery and Fishery Reform implementation policy (C-3616) and giving the public the opportunity to provide comments and input. As you are aware Hatchery Reform is the best available science to manage our hatchery and fishery programs while also achieving recovery of weak salmon and steelhead stocks. Protection of the basic genetic material or genes of native stocks is critical towards this recovery. In a July 2008 letter Governor Gregoire asked the Commission to address Hatchery Reform and Mark Selective Fisheries. This policy statement is a necessary step in this progression and testimony that these issues will be addressed.

As a citizen oversight committee (PSRFEOC) established by statute, we have direct input to staff in developing staff programming concepts that directly impact the recreational sport fishing community and its ability to access hatchery produced salmon through various mark selective fisheries in Puget Sound. With this in mind, we want to make sure, as you do, that the policy provides specific and measurable guidelines and goals to staff for the implementation of the concepts developed and presented to agency by the Hatchery Scientific Review Group (HSRG). Members of the committee have been discussing ideas about the wording and implementation process. We wanted you to know that we will have testimony to present at your meeting on June 5 concerning the policy draft and we'd like the opportunity to participate with staff by reviewing and commenting on the final draft that will be presented for your action at the July Commission meeting.

In addition to our public testimony on June 5th we have prepared the following suggested edits to the current draft policy.

- 1) Item 2 under the Policy Guidelines: Reword – *Implement the principals, standards, and recommendations of the Hatchery Scientific Review Group (HSRG) IN the management of hatcheries operated by the Department.*
- 2) Item 4a under the Policy Guidelines: Reword – *Integrated programs implemented to enhance harvest opportunities (i.e., integrated harvest programs) will achieve a proportionate natural influence (PNI) equal to or greater than 0.70 and a percentage hatchery origin strays (pHOS) not great than 0.30 on average, use hatchery practices that reduce the risks of domestication, and broodstock that is indigenous to the watershed.*
- 3) Item 5 under the Policy Guidelines: Reword – *Externally mark all hatchery produced Chinook, coho, and steelhead production that is intended for harvest, except in the case of currently existing State/Tribal agreement that devate from this policy. All future agreements need to be in compliance with HSRG recommendations for marking.*
- 4) Item 7 under the Policy Guidelines: The benchmarks identified in the 21st Century Salmon and Steelhead Framework is much too long. Multiple decades for implementation of HSRG recommendations are far too long for such a critically needed program. Many of the recommendations could be implemented immediately, while a five year window for full implementation seems reasonable.
- 5) Items 8-10 under the Policy Guidelines: If gear changes are needed folks need to plan for acquisition of new gear and should be allowed transition time but conservation and recovery should be the driving factor. This should be completed within five years. The policy statement should have annual benchmarks of success identified and reviewed until full implementation is completed.

Thank you for taking the time to consider our recommendations. We look forward to providing necessary clarification and support as this process continues.

Comment 15)

June 1, 2009

TO: Washington Fish and Wildlife Commission

FROM: The Hatchery Scientific Review Group (HSRG)

SUBJECT: COMMENTS ON PROPOSED HATCHERY AND FISHERY REFORM POLICY

The Congressionally-established HSRG has provided a foundation for hatchery reform principles that should aid salmon hatcheries in the Pacific Northwest in meeting conservation and sustainable harvest goals in the 21st century. The HSRG process has established principles for goal setting, scientific defensibility, and adaptive management of hatchery programs. Tools to determine outcomes of proposed actions have been developed and include a scientific framework for artificial propagation of salmon and steelhead, a benefit/risk assessment tool, hatchery operational guidelines, and monitoring and evaluation criteria.

The HSRG is pleased to see progress towards implementation of HSRG principles and recommendations in the form of the proposed "Hatchery and Fishery Reform Policy". The Commission and Department are to be commended for jointly addressing *harvest* and *hatchery* reform policy because the two are so closely aligned. The HSRG also appreciates the opportunity to comment on the draft policy.

We feel that there are three areas in regard to broodstock and escapement management that need to be strengthened or are lacking in the current draft policy. First is the need to assign explicit conservation designations to all populations. Under "Policy Guidelines", item number four, the current draft states "For programs affecting the wild populations of importance for conservation and recovery, the plan will include goals with the following elements:" The narrative goes on to describe managing broodstock to achieve a proportionate natural influence (PNI) equal to or greater than 0.7 on average.

The HSRG feels that all populations must be designated whether or not they are listed under ESA or are just "important for conservation and recovery." The primary requirement for assigning a designation is having a goal (i.e. harvest, conservation, etc.). Since the Department has already done this for nearly all populations, assigning a designation should be relatively easy and could be done within weeks for the salmon populations in Washington. Based on information provided by the co-managers the HSRG has already assigned population designations to all of the Columbia River Basin populations using the same population designations (Primary, Contributing or Stabilizing) that were adopted and used by the Lower Columbia River Recovery Board.

The second addition the HSRG feels is important to address is the need to establish standards for each of the three population designations. The current draft only addresses PNI (equal to or greater than 0.7) for "important (primary) populations". The PNI standards for contributing populations should also be established. We recommend that PNI for these populations should be at least 0.5. In addition to PNI standards it is also critically important to incorporate standards for limiting the percent of hatchery-origin adults (strays) on the spawning grounds (pHOS). The pHOS standard is noticeably missing but is critically important to help address ecological, as well as genetic, interactions. The scientific literature and analyses of the HSRG clearly indicate that reducing pHOS is a much more effective and sustainable approach for achieving a desired PNI than increasing pNOB (mean proportion of a hatchery broodstock composed of natural-origin fish) to overcome a high value of pHOS. Consequently, the HSRG recommends that pHOS be no greater than 30% for Primary or Contributing populations when those populations are influenced by genetically-integrated

broodstocks. The HSRG has concluded that values of pHOS > 30% pose significant long-term genetic risks to natural populations even when a desired value of PNI is achieved via proper, integrated broodstock management.

Lastly, the HSRG has concerns about the specified timeline for implementation of the guidelines within this policy. Item seven under the current draft calls for “a schedule that meets or exceeds the benchmarks identified in the *21st Century Salmon and Steelhead*”. The timeline implementation in this document stretches out for more than two decades. The HSRG feels a much greater urgency. Many weak, naturally spawning salmon and steelhead populations are heavily influenced by hatchery fish (e.g. lower Columbia Chinook and coho, steelhead everywhere, and most Puget Sound Chinook and coho). This negative hatchery influence inhibits recovery by (a) causing direct competition and potential interbreeding hatchery and natural-origin fish, thereby driving down the productivity of natural populations and (b) preventing those populations from adapting genetically to local conditions. Climate change and modified aquatic environments, resulting from human development, exacerbate this situation and dictates the need for more timely action. Proposed policy changes are not difficult or expensive; they can be accomplished relatively quickly. The HSRG does not agree with the contention that managing broodstock and natural escapement to achieve PNI and pHOS standards is a long-term expensive proposition. On the contrary, the HSRG believes that our recommendations will result in more *efficient* and *effective* hatchery operations that will reduce infrastructure costs in the long-run. Although implementation of HSRG recommendations will require some changes in procedures, and in some cases the use of new weirs, the HSRG sees no scientific, economic or management reason why full implementation of PNI and pHOS standards could not be accomplished within five years for all Primary, Contributing and Stabilizing populations. The HSRG notes also that the Recovery Implementation Science Team (RIST) of NMFS, which includes both Tribal and WDFW representatives, has endorsed the HSRG guidelines as a “major improvement over the status quo”. Indeed, the RIST was cautious that the HSRG guidelines may not be sufficient for achieving recovery goals. The analyses and conclusions of RIST reinforce the need for rapid implementation of hatchery reforms.

We also have a comment on implementation of selective fisheries. The draft policy states that “As a general policy, the Department shall implement mark-selective salmon and steelhead fisheries, unless the wild populations substantially affected by the fishery are meeting spawner and broodstock management objectives”. We assume that this refers to achieving your goals for PNI and pHOS. While achieving these goals is important, these are minimal acceptable conditions, not necessarily targets. That is, if you can remove additional hatchery fish from natural spawning populations with a resulting decrease in pHOS, then natural productivity can generally be improved more than by just reaching your goals. A stewardship responsibility that protects natural populations from hatchery fish needs to be an integral part of fisheries management. Therefore we suggest that the use of selective harvest techniques to reduce harvest on natural spawners and/or to increase the harvest of hatchery fish would be a benefit even if your goals are being reached.

Again, thank you for the opportunity to review the draft policy. If the Commission would like further clarification of our guidelines or the timelines for implementation we would gladly meet with the Commission.

cc: Governor Christine Gregoire
Congressman Norm Dicks

Comment 16)

From: Salmon For All

Sent: Wednesday, May 27, 2009 11:33 AM

To: Commission (DFW); Yeager, Susan D (DFW)

Cc: Hatfield, Brian; Senator Ken Jacobsen; Brian Blake; Takko, Dean

Subject: Salmon For All's response to C-3619, the Proposed Hatchery Reform Policy

Dear Chair Wecker and Members of the Washington Fish & Wildlife Commission,

Attached please find the response of Salmon For All to Draft 2 of C-3619, the Proposed Hatchery Reform Policy now under consideration by the Washington Fish & Wildlife Commission.

Thank you for the opportunity to provide comment on this proposal.

Respectfully,

Hobe Kytr, Administrator
Salmon For All

May 27, 2009

Washington Fish & Wildlife Commission
Dear Commissioners:

We would like to comment on WDFW Commission proposed policy C-3619 on Hatchery and Harvest Reform. Unfortunately, the public hearings have been scheduled for the months of June and July, when the vast majority of Washington State's commercial salmon fishermen are engaged in fishing either offshore or in Alaskan waters, and unavailable to comment in person.

A number of fishermen in the Columbia River commercial salmon gillnet fishery are involved currently in the development of selective fishing gear for the mainstem Columbia. The most promising gears at present are the seine, both purse and beach, and the tangle net with an auxiliary oxygen system for the recovery box. For the present, other options, such as the trap, reef net and fish wheel are considered much more problematic, and are on the low end of the priority list.

We would like to draw your attention to a number of issues and parameters regarding development of alternative harvest methods.

1. None of these gears, except the tangle net, were ever designed or used on a commercial scale on the Columbia River with the idea of returning fish to the water alive.
2. There have been dramatic changes in environmental and water conditions since these gear types were last used. For example, there has been an exponential proliferation of invasive aquatic plants, such as Eurasian milfoil, that tends to foul stationary gear even after brief periods of time.
3. There have been large increases in marine mammal predations and societal attitudes regarding them have changed in the seventy or more years since gears such as seines and traps were last used on the Columbia.
4. There is a need for selective harvest methods to be economically viable. Most of these gears are both labor and capital intensive. They will need to produce more fish than a gillnet, not only to fund increased equipment expenses but to support three or four families, as compared with a one person gillnet boat operation.

5. Continuing in the economic viability vein, these gears need to fish primarily in the mainstem where fish still have substantial market value, not in the tributaries, where quality often rapidly degrades.
6. Mobility: Both hatchery and natural salmon populations typically fluctuate substantially in terms of when and where their migration occurs while in the river. Technologies that are the most flexible in terms of time and area are the best fit in order to take advantage of harvesting opportunities. Gears such as traps and wheels, which are extremely site specific and not generally very mobile, are less reliable methods of ensuring that harvestable surpluses can be caught.

In sum, we are looking for a policy that encourages creativity and experimentation, while using caution in order to ensure that unacceptable bycatch losses and other unacceptable costs and problems are avoided. There also needs to be a recognition that new gear will not materialize overnight, and that years of experimentation may be necessary.

In this regard funding is going to be crucial to dealing with some real challenges. The Colville Tribe is approaching its second season of a five-year testing phase with experimental gear. Lower Columbia fishermen are being paid to design, build and test the gear. We note that the mainstem Columbia below Bonneville Dam, with tidal influence, strong current, and a multiplicity of stocks and species is a far more complicated milieu for gear experimentation than the upper Columbia. Expecting fishermen to design viable alternative harvest technologies and deploy them on a commercial scale is not realistic in anything under ten years.

We would further comment that the notion that mark-selectivity is preferable to all alternatives ignores the limitations of live-capture technologies. For example, using a small-mesh tangle net during warm water conditions in summer will likely impact non-target listed species such as summer steelhead and sockeye, whereas using a large-mesh gillnet allows the non-target fish to simply swim through the gear, thus avoiding capture and handling entirely. In this case, utilizing the larger mesh size is superior to going mark-selective.

Finally, in the context of the HSRG recommendation of removing large numbers of more abundant hatchery fish before they become a habitat/spawning ground issue, we would suggest an additional policy statement: "If there are substantial hatchery surpluses to be harvested and the commercial fishery develops selective harvest technologies that are equal to or lower than the prevailing rates in other fisheries, it will be a policy to reserve impact handling mortalities of non-target stocks for the commercial fishery commensurate with the level of fish to be harvested."

This policy will also provide incentive for fishermen and local communities to build infrastructure and invest once again in resources they have depended upon for 150 years. In the rush to solve these scientific and technical problems, the livelihoods and communities of those most affected have largely been overlooked, as have the needs of the consumer market. Perhaps it would be well to pause and reflect that the large hatchery programs on the Columbia River and elsewhere came into being to mitigate for harvest opportunities lost by those communities due to the diversion of water and habitat that salmon needed, in order to serve other purposes. The past president of the Oregon Restaurant Association recently commented, "People don't come to visit Oregon with the idea of eating a hazelnut or a pear, but they do expect to eat salmon." We don't need to import the Northwest icon from British Columbia or Alaska.

Respectfully,

Hobe Kytr, Administrator

cc: Rep. Brian Blake, Chair, House Agriculture and Natural Resources Committee; Sen. Kenneth Jacobsen, Chair, Senate Natural Resources, Ocean & Recreation Committee; Sen. Brian Hatfield; Rep. Dean Takko

Comment 17)

From: Bryan Townley

Sent: Sunday, May 31, 2009 10:20 PM

To: Commission (DFW)

Subject: Hatchery Reform & Regulations

To: Washington Fish and Wildlife Commission,

There are multitude of ideas and issues the Commission is being made aware of. The Commission should make their decisions based on science and studies conducted by state and tribal biologists. The **Commission should not make decisions based on special interest groups agendas.** While I'm sure many of these issues have already been addressed, I am writing to you to voice some of the ideas many of us feel are warranted. These include:

-A one wild fish per year on certain rivers with spaghetti tags. The one tag would include a surcharge and is not replaceable.

-Change the regulation on the selective fishery on the Snoqualmie. The only reason this went through is due to a local special interest groups. They didn't take this measure on the Skykomish? Same river system. Also, with this system it **makes no sense to not release summer steelhead on the Snoqualmie** and go ahead with the release of these same type of fish to the Wallace, Sultan, and Skykomish rivers (same river system again). If the argument is to designate the Snoqualmie as a wild summer run river then why not the others on the Sky that hold way more habitat for wild fish. The majority of the Snoqualmie summer fish shoot directly to the falls where they have nowhere to go and are caught and retained for table fare. This is a great urban fishery that many anglers look forward to. It seems ironic that the Snoqualmie is the **only** river in the area that has seen fly fishing type regulations imposed on it. Once again, the same local special interest group again. We pay to fish here too.

-One more for the Snoqualmie system. It would make logical sense to **open the upper portion (above the bridge) of Tokul creek** for the winter run season and close the lower creek to ensure escapement numbers. This fishery has been open only right below the bridge where the fish are intercepted before making their return. There is a lot of area above where sportsmen can fish without having an impact on the number of fish returning.

-Increase hatchery production both summer and winter run on the Cowlitz river. **What is going on with the early Blue Creek winter run?**

-Allow sport seasons on any rivers with open net seasons. This one is getting old. The nets wiped out the hatchery runs on the Skookumchuck and the Wynoochie in 2008. The nets were in the river while hatcheries were just trying to get the escapement numbers. If they don't have the numbers, close it to everyone.

-Limit the amount of guides on these rivers. These river fisheries are commercialized by catching steelhead for a profit. This state hasn't shown the will to attempt to control Indian fishing. They (the tribes) consider it a business. I thought that steelhead were a game fish (sport fishing).

-What is going on with the these individuals catching fish for people with disabilities. I'm not talking about two individuals next to one another fishing, but **having a fisherman out on the river catching a limit of fish while the disabled person is nowhere in sight.** This has been a common occurrence up at the Barrier Dam. There should be a distance (under 25ft maybe?) not 100yds away.

I would like to Thank You for taking these ideas into consideration.

Sincerely, Bryan Townley

Comment 18)

From: Lesko, Erik

Sent: Friday, May 29, 2009 3:00 PM

To: Commission (DFW)

Subject: PacifiCorp comments regarding proposed hatchery and fishery reform policy

Dear Fish and Wildlife Commission - I have reviewed the proposed policy dated May 12, 2009 and have the following comment regarding the draft policy.

As you may know, PacifiCorp along with various resource agencies are beginning a reintroduction program for coho, winter steelhead and spring chinook to the upper North Fork Lewis River. The draft policy relies on mark-selective fisheries to enhance harvest and reduce hatchery fish and their potential influence on wild stocks. However, with limited enforcement presence the potential to affect natural stocks increases with increased harvest. These effects can be from direct poaching, or indirectly from hooking and handling mortalities. The success of our reintroduction programs relies, in part, on successful trapping of and adequate number of adult returns for reintroduction. Therefore, PacifiCorp does not support increased harvest opportunities without the assurance of increased enforcement or possibly changes in the type of bait or lures used to reduce any hooking mortality.

Thank you for the opportunity to comment

Erik Lesko

Comment 19)

From: Gestin Suttle

Sent: Thursday, May 28, 2009 12:18 PM

To: Commission (DFW)

Subject: Comments to Draft Hatchery and Fishery Reform Policy

HELLO,
PLEASE FIND ATTACHED AND BELOW COMMENTS FROM FRIENDS OF THE ISSAQUAH
SALMON HATCHERY RE: THE COMMISSION'S DRAFT HATCHERY AND FISHERY REFORM
POLICY.
I'M ALSO HAPPY TO ANSWER ANY QUESTIONS YOU MAY HAVE. THANK YOU.

FRIENDS OF ISSAQUAH
SALMON HATCHERY
ISSAQUAH, WASHINGTON

May 28, 2009

Washington Fish and Wildlife Commission
600 Capitol Way N.
Olympia, WA 98501-1091

Dear Commission Members,

Thank you for the opportunity to provide comments on the proposed hatchery and fishery reform policy. As you consider policy reforms, Friends of the Issaquah Salmon Hatchery (FISH) would like to encourage the commission to continue its focus of increasing chinook fishing opportunities throughout the Puget Sound region. In particular, FISH is advocating the opening of selective chinook fisheries on Lake Washington and in Puget Sound Marine Areas 10, 11 and 12.

Creating additional chinook fishing opportunities in these areas would benefit the public because it will provide more opportunities in the most densely populated area of the state, which supplies the greatest cost benefit. A high percentage of the state's population lives close to Lake Washington or within easy travel. Opening fisheries in urban areas is particularly attractive and beneficial to families because of the ability to get to these locations quickly, which would encourage increased participation in outdoor recreational opportunities among families.

Opening up selective chinook fisheries would also allow the public access to a prized species that has been returning to Issaquah in large numbers. Currently, many chinook that return to the hatchery that are not needed for the spawning program must be "surplussed" or killed without being spawned. While the surplussed fish go to local food banks when possible, FISH contends there would be a greater public benefit if these fish were caught by anglers before reaching the Issaquah hatchery. Last year 614 chinook were surplussed and in 2007, when a record number of chinook returned to Issaquah, 11,663 were surplussed.

On the other hand, it would not be beneficial to lower the production level of chinook because that could have a wide-ranging ripple effect that might include reducing the number of naturally spawning salmon to unsustainable levels and limit food supplies for wildlife such as Puget Sound orcas.

Increasing chinook fishing opportunities on Lake Washington and in Areas 10, 11 and 12 will generate such high public interest that it would provide a strong source of economic development for the state in terms of increased fishing licenses and increased revenues related to fishing. In 2006, recreational anglers in Washington spent an estimated \$904.8 million on fishing-related equipment and trip-related items.

In addition, a chinook fishery on Lake Washington would enhance the Department of Fish and Wildlife's public outreach efforts. Because of Lake Washington's urban, centralized location, it is one of Washington State's most popular lakes and would serve as an ideal backdrop to showcase how the state successfully runs hatcheries. This would create improved opportunities for the Department of Fish and Wildlife to use the Issaquah facility as a model of how hatchery practices are evolving in response to environmental concerns and how its partnership with FISH leverages resources to create greater public awareness and understanding of the salmon life cycle and habitat needs. This would help send the right message to businesses and the general public about the need to continue funding hatcheries at their most optimum levels.

We appreciate your time in considering these matters and hope you will respond favorably to this request.

Sincerely,
Gestin Suttle
Executive Director

Comment 20)

From: Randolph Harrison

Sent: Thursday, May 28, 2009 4:10 PM

To: Commission (DFW)

Subject: The future role of Puget Sound hatcheries and Issaquah hatchery in particular.

Dear Commission Members,

As a member of Friends of Issaquah Salmon Hatchery since its formation, I have had a long-standing interest in the ever-changing issues of both Puget Sound salmon and the role of the Issaquah hatchery.

I know that you have already received a detailed email from the executive director of FISH, Ms. Gestin Suttle. In the name of brevity, allow me to say that I strongly agree with all of the points she made in her compelling message. I was particularly struck by what I feel is the relevance of the connection between hatchery-spawned salmon and our resident Orca population. I fully understand that we face a situation regarding all of these species wherein the questions outnumber the answers. From what I have been able to learn during the last five years, it seems clear that a primary concern about our orcas relates directly to their primary food source, specifically salmon.

I not only lack any scientific background but my interest in our unique Puget Sound dates back only two decades, the time frame that began when I moved my family here from the east coast,

primarily because of the attraction of our environment. That said, it seems only logical that, when decisions are made regarding hatchery operations, the need to ensure our resident orca pods have sufficient food stocks would be of paramount importance.

I also respectfully submit that yet another important -- albeit parochial -- factor to consider is the unique educational benefit to the general public provided by the Issaquah hatchery, its staff and the scores of volunteers devoted not only to its daily operation but also to expanding the universe of knowledge and appreciation of the role salmon play in our collective world.

The economic pressures faced by all aspects of our society today, from corporations and governmental agencies to individuals and families, are absolutely fundamental factors in what we do and how we do it. We all know that.

At the risk of sounding pedantic, it boils down to the question of how best to invest very finite resources.

Our hatcheries ensure there are salmon coming home year in, year out. They ensure our children get as excited about their environment as we did, that we have salmon in our markets and that the links in the natural chain that require salmon for their very survival are not broken because of human acts.

I thank you for taking on this crucial and controversial issue and I know you are each motivated by your respective desire to do what is best for the long term.

I have lived in more than 55 places in my 65 years. I chose the Pacific Northwest as the place to raise my sons. The issue, as I see it, is what their children and grandchildren will think of the decisions we make today. I'm confident that when all is said and done, we'll all do the right thing.

Respectfully yours, Randolph Harrison

Comment 21)

From: David Knutzen

Sent: Monday, June 01, 2009 3:54 PM

To: Commission (DFW)

Cc: Bruce Arnold ; Clint Muns; Dave Croonquist; 'Fischer, Polly '; Kevin Ryan; 'Les Johnson '; Mike Gilchrist; dave knutzen

Subject: hatchery and fishery reform policy comments

The Puget Sound Recreational Enhancement Oversight Committee has reviewed the draft Hatchery and Fishery Reform Policy. Attached are suggestions to this policy for your consideration. It is an important policy statement and we as a group applaud your efforts to work toward full implementation. The Oversight Committee would gladly meet with members of the Commission should further detail be desired.

Thank you for taking the time to consider our suggestions.

June 1, 2009

TO: Washington Fish and Wildlife Commission

FROM: Puget Sound Recreational Fisheries Enhancement Oversight Committee

(Clint Muns, Mike Gilchrist, Polly Fisher, Les Johnson, David Croonquist, Bruce Arnold, Kevin Ryan, Dave Knutzen)

SUBJECT: Proposed Hatchery and Fishery Reform Policy Comments

The Puget Sound Recreational Fisheries Enhancement Oversight Committee (PSRFEOC) applauds the Commission for developing a Hatchery and Fishery Reform implementation policy (C-3616) and giving the public the opportunity to provide comments and input. As you are aware Hatchery Reform is the best available science to manage our hatchery and fishery programs while also achieving recovery of weak salmon and steelhead stocks.

Protection of the basic genetic material or genes of native stocks is critical towards this recovery. In a July 2008 letter Governor Gregoire asked the Commission to address Hatchery Reform and Mark Selective Fisheries. This policy statement is a necessary step in this progression and testimony that these issues will be addressed.

As a citizen oversight committee (PSRFEOC) established by statute, we have direct input to staff in developing staff programming concepts that directly impact the recreational sport fishing community and its ability to access hatchery produced salmon through various mark selective fisheries in Puget Sound. With this in mind, we want to make sure, as you do, that the policy provides specific and measurable guidelines and goals to staff for the implementation of the concepts developed and presented to agency by the Hatchery Scientific Review Group (HSRG). Members of the committee have been discussing ideas about the wording and implementation process. We wanted you to know that we will have testimony to present at your meeting on June 5 concerning the policy draft and we'd like the opportunity to participate with staff by reviewing and commenting on the final draft that will be presented for your action at the July Commission meeting.

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- 5) Items 8-10 under the Policy Guidelines: If gear changes are needed people need to plan for acquisition of new gear and should be allowed transition time but conservation and recovery should be the driving factor. This should be completed within five years. The policy statement should have annual benchmarks of success identified and reviewed until full implementation is completed.

Thank you for taking the time to consider our recommendations. We look forward to providing necessary clarification and support as this process continues.

Comment 22)

FROM: Ray Pfliger

[see next 3 pages]

RECEIVED

MAY 28 2009

FISH AND
WILDLIFE COMMISSION

Pflieger
PUBLIC INPUT - NO
RESPONSE NECESSARY
5-21-09 6/3/09
CC: COMMISSION

Jim S.
Andy A.

WDFW

THIS IN REFERENCE TO PROPOSED
HATCHERY + FISHERY REFORM POLICY.

I AM 73 YEARS OF AGE AND HAVE
FISHED THE COLUMBIA RIVER SYSTEM
FOR MOST OF THOSE YEARS AND I
WOULD LIKE TO SUBMIT TO YOU THAT
THE SALMON + STEELHEAD ISSUE WILL
NEVER BE SOLVED BY ANY OF THE
METHODS SUGGESTED THUS FAR AS PROVED
BY ALL THE SCIENTIFIC FINDINGS
PRESENTED TOE PUBLIC WHICH SEEMINGLY
HAS NOT HELPED. I CAN PROVIDE YOU
WITH A METHOD TO SATURATE THE
RIVERS WITH SALMON + STEELHEAD
WHICH WOULD BE FAR LESS COSTLY
THAN THE MILLIONS AND PERHAPS
BILLIONS SPENT IN THE LAST 50
YEARS. FIRST OF ALL I WOULD
LIKE TO REMIND YOU THAT HATCHERY
+ WILD FISH BECOME ONE + THE
SAME AND HERE'S WHY, AS FAR
BACK AS I CAN REMEMBER
HATCHERIES HAVE BEEN USED TO

BUILD RUNS IN THE COLUMBIA, FURTHER YEARS AGO FISH WERE NOT OFTEN MARKED, SO THE POINT BEING THAT MOST EVERY STEELHEAD + SALMON ENTERING THE COLUMBIA RIVER SYSTEM IS THE OFFSPRING OF A ONCE HATCHERY REARED FISH. I DO AGREE THAT A HATCHERY RAISED FISH IS NOT AS STRONG AS A FISH SPAWNED IN A RIVER SYSTEM, EVEN THOUGH THEY TASTE AS GOOD OR BETTER, HOWEVER WHEN THESE FISH RETURN AS ADULTS MANY ARE NOT ABLE TO REACH A HATCHERY AS I HAVE SEEN THEM RUNNING UP IRRIGATION DITCHES AND THE LIKES THEREFORE THEY END UP SPAWNING IN THE RIVER SYSTEM AND GUESS WHAT THOSE SMOLT THEN BECOME WILD FISH WITH THE SAME MIXED GENETICS AS ALL OTHER WILD FISH. SO THE ANSWER IS NOT TO OPEN THE SEASON AND THEN SUDDENLY CLOSE IT AGAIN, NOT TO TEAR OUT DAMS, NOT TO CHARGE MORE FOR TAGS BUT SIMPLY TO BUILD MORE AND BETTER HATCHERIES WHICH

WOULD SATURATE RIVERS WITH BOTH
WILD & HATCHERY FISH.

THE FOREGOING IS A SIMPLE BUT
EFFECTIVE SOLUTION SO IF PEOPLE
WHO ARE INVOLVED IN SAVING THE
SALMON ARE TRULY INTERESTED
IN ACTUALLY SAVING THEM INSTEAD
OF THEIR OWN PERSONAL INTERESTS
THEN THEY WILL FASHION A PLAN
ALONG THESE LINES SIMPLY BECAUSE
IT WILL WORK.

SOME DAY SOME WAY SILLY OUTDATED
TREATIES THAT NOW EXHISTS BETWEEN
TRIBES AND ALL OTHER PEOPLE ON
THE PLANET MUST BE BROKEN OR
AT LEAST CHANGED TO CONFORM WITH
MODERN TIMES SO THAT NETS ARE
REMOVED FROM RIVERS

Ray Pfliger Ray Pfliger
3800 RIVERHAVEN ST
PASCO WA 99301