January 17, 2013

Hatcheries - Attn: Brian Missildine
Washington Department of Fish and Wildlife
600 Capitol Way North
Olympia, WA 98501

Dear Brian,

Thank you for the opportunity to respond to the Draft Green River Hatchery Genetic Management Plan (HGMP). Three members of the Coastal Conservation Association were among the eleven citizen members of the WDFW Puget Sound Hatchery Action Advisory Group (PSHAAG) that met monthly in day-long meetings for nearly a year. Many of the important issues discussed directly related to developing HGMPs for Puget Sound salmon and steelhead hatcheries. In addition to the citizen advisors, one or more of the members of the Hatchery Scientific Review Group (HSRG) were in attendance to provide technical support. The department went to great lengths to involve their most qualified scientific and administrative staff in preparing for and conducting these meetings. Throughout the course of the process the participants were unerringly guided by the Commission's Hatchery and Fishery Reform Policy (C-3619) to reach ultimate consensus regarding key policy issues.

Unfortunately, the draft Green River HGMP does not align with key policy setting targets such as PNI, pNOB, and pHOS. Further, WDFW staff and the PSHAAG members designated the Green river as 'contributing' while the current HGMP lacks a clear population designation (primary, contributing, or stabilizing) as referenced in the Commission's Policy.

The PSHAAG spent more effort discussing the Green River Chinook population than any other. The basis for this concern is that these fish, for several reasons, are a legacy population that in recent years have maintained a relatively healthy wild component. The bottom line of the PSHAAG's consensus for the Green River was to implement an approach, consistent with HSRG recommendations, which preserved and enhanced the wild population while providing hatchery fish that would sustain higher harvest rates than the wild population. This approach would require reducing the hatchery influence on the wild population and implementing a selective fishing program and/or a weir on the Green River to target the removal of hatchery stocks – processes not addressed in the draft HGMP. This is particularly concerning and troubling to CCA members of the PSHAAG.

In addition to the obvious conservation concerns, recreational fishermen have a special interest in Green River Chinook. Washington's salmon sport fishery was essentially born on Elliott Bay and most of

the funding for the current Green River hatchery programs comes from recreational sources. We note that the HGMP includes a release of 1,000,000 ventral marked hatchery Chinook from Palmer Ponds into the upper Green. These fish would be available to the tribal fishery but, lacking an adipose clip, not to salmon anglers. It appears that the documented excessive mortality resulting from use of the ventral clip (47% higher than an adipose clip) would negate any potential survival benefits resulting from exemption from sport harvest and we would suggest that the adipose clip or CWT only form of identification. These two methods are currently used statewide for other conservation programs.

It is abundantly clear to us that that in order to make any sense out of the co-management process and implement a strategy for recovering ESA-listed populations, the basic issue of "a fish is a fish is a fish" must be resolved. The contention of some interests, including the Mukleshoots, that hatchery origin natural spawners are legally and biologically sufficient must be resolved. It appears to us that both the science and most recent federal court decisions clearly recognize a difference between natural origin and hatchery origin spawning as it relates to ESA-listed populations. This fundamental issue is at the heart of the flaws with the Green River-Soos HGMP.

For the reasons noted above, CCA opposes the adoption of the Green River-Soos HGMP as currently written. We also question the HGMP's compliance with the Commission's Hatchery and Harvest Reform Policy. In addition, in light of the recreational funding received by Green River hatchery programs we believe the sport fishing regulations should be amended to allow retention by sport fishermen of Chinook salmon which are either ventral fin or adipose fin clipped.

I will be happy to respond to questions or to meet with you to further discuss the Green River - Soos Creek HGMP, as I am sure the PSHAAG would as well.

Sincerely,

Andrew Marks, Vice President
Coastal Conservation Association, Washington