COASTAL CONSERVATION ASSOCIATION
WASHINGTON

August 1, 2012

Mr. Jon Anderson
600 Capitol Way North
Olympia, WA 98501

Dear Mr. Anderson:

Thank you for providing us with the opportunity to comment on the updated Elwha River Hatchery and Genetic Management Plan (HGMP) for Summer/Fall Chinook Salmon.

The Coastal Conservation Association (CCA) Washington, with a membership of 5,000, is intensely interested in the restoration of the Elwha River and its native salmonid populations. Removal of the Elwha dams with the pristine habitat above the dams provides a tremendous opportunity to essentially 'start over" and employ today's scientific knowledge on how best to manage harvest and hatcheries.

After reviewing the Elwha River HGMP, we are of the general opinion that plan relies excessively upon the continuation of artificial rearing practices rather than utilizing a more balanced approach designed to evaluate the effectiveness of allowing significant numbers of returning adults of natural origin to seek up-river habitat for natural spawning and juvenile rearing before intervening with hatchery supplementation. The draft HGMP fails to commit to identifying (visibly marking) all hatchery released juveniles so real-time broodstock management of the adults at the weir or hatchery can occur.

The draft HGMP also seems very vague in what will actually occur. Instead of examples of actions that might be employed if some phenomenon is observed, hard decision rules should be stated along with an adaptive management approach that can both collect data on status of recolonization by natural reproduction, and change the proposed actions should observed results indicate need for change. We fear the current action plan reflects status quo or past approaches to hatchery operations where the influence of domesticated hatchery fish overwhelm natural origin fish and prevent local adaptation from occurring.

CCA Washington has developed a great deal of respect and confidence in the recommendations of the Hatchery Scientific Review Group (HSRG), and defers to HSRG to provide you with specific suggestions for improving the plan.

Sincerely,

Bryan Irwin
CCA Washington
Executive Director

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