

## Soos Creek Fall Chinook HGMP: Public Comments received via e-mail

- 1) **From:** Isaac Fu [[isaacfu@gmail.com](mailto:isaacfu@gmail.com)]  
**Date:** Thu 12/6/2012 12:48 PM  
**Subject:** Soos Creek Fall Chinook

Would like to propose that the fish be released at a larger size than a yearling.

Nisqually produces good run of fall hatchery chinook in comparison to all other puget sound rivers. One could assume that that is due to the estuary that is present on the Nisqually but one other notable difference is that they release the fish at a later stage in life when they are larger than the fish that are released by the state hatcheries. I believe that this could contribute to a higher return rate of the adults.

Thank you,

Isaac

- 2) **From:** Austin Hoesley [[ahoesley1@yahoo.com](mailto:ahoesley1@yahoo.com)]  
**Date:** Sunday, December 09, 2012 8:26 PM

Hello,

My name is Austin. I'm an active dedicated fisherman and conservationist who fishes all available portions of the Green/ Duwamish river during it's open seasons. Fishing is my lifestyle.

The area's of most interest to me in this study are 1) exemplified in Table 2.2.2.6 and 2.2.2.7. Both tables indicated a stable trend in Chinook and wild steel-head returns, although the numbers are low, until 2008-2009 returns at the period of most rapid US economic decline. There is a consistent documented decline in the number of documented returning Chinooks (wild and hatchery) and wild steel-head. I am very curious to see how the Native American and Non Native American commercial fisheries catch reports account for these changes....as the data used in each study was produced independently, illustrating a concurrent, highly similar trend. Additionally I have observed, while fishing various locations of the Duwamish portion of the system, Muckleshoot tribal fishers harvesting hatchery Chinook AND WILD Chinook out of their gill nets. They remove them alive, cut the gills, and flop the carcasses in their fisheries harvest boat. I've watched this happen with a Tribal Fisheries Police officer in a patrol boat present, observing the same actions.

2) My greatest concern lies with the SUMMER HATCHERY STEEL-HEAD return. As "you" are aware this season a new rule was instituted on the Green River. A new boundary creek was added, Cristy Creek. From Cristy Creek downstream to the Highway 18 bridge (location of Soos Creek) closes first day in September, to reopen the first Saturday of November. Traditionally some of the best summer steel-heading, in a state financed hatchery program designed for fisher people such as myself to have access to harvest these fish, occurs during this time. This new closure went into effect with the expanding efforts concerning Chinook rehabilitation in the Green. My question is why is it not possible to transport and release the adult fish into the upper most section of the water shed near the head works of Howard A. Hanson Dam....near the Icy Creek Hatchery. The fish could spawn naturally on the species appropriate spawning habit in that section of the system , undisturbed by human activity. This could foster a bolstered "native" run as described as an intention of this HGMP. Why do the fish need to be planted into the section of the river utilized by drift boat anglers, during the peak of the summer hatchery steel-head return. That action appears as a direct if not intentional limitation of an existing fishery. There are alternative methodologies that, as stated in this HGMP concerning transportation of fish from the Soo's Creek to the other hatcheries (Palmer and Icy) can be utilized that do not disrupt the summer steal-head fishery while ensuring healthy adult spawners reach suitable spawning habitat. The Cristy Creek to Soos Creek section of the river is the only section of the river where access and fishing from a floating device is allowed.

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Additionally my self and all fisher people in this state pay approximately 70 dollars per season to fish freshwater, saltwater, shell fish, and Columbia River Steel-head Endorsements.....and now pay for a Discover Pass (\$30 annually) to park our vehicles/ access lands we must travel through TO fish. If the intent of this hatchery program is to allow license purchasing citizens, who foot part of the bill for the hatchery programs to exist through license fees and taxes, to have a chance to FISH for and RETAIN hatchery marked Chinook, (not dissimilar to Tulalip tribal fishery design(s) and Gray's Harbor Fisheries Management), in the Green River system WITHOUT limiting our access to the river AND run timing for this and other species (steel-head), then by all means you would have my full support. Currently, and I state this without anger or malice, it appears that the politics of this system are executed to ensure the Muckleshoots are able to "harvest" their legally allotted fish. Beyond that little is left for us tax and license paying fisher people. The most evident example of this is the timing of runs not coinciding with portions of the river being open and available to fish in. As an example the coho migrate through the lower portion of the river within hours and are up on the spawning grounds (and in the hatchery) where it is unlawful to fish for them for two additional months until the upper sections are opened. There are very few bright, table fare coho available for harvest once the sections are open. The portions of bank and river open during the coho run are either steep banked and over grown and or not legal to fish from a floating device; boat, pontoon, pram, log etc.

In order for the study of the modification of this particular HGMP to truly be accurate and quality, I do believe it should be more comprehensive. Please review the available statistics on the Green River CHUM and PINK salmon returns during the identical time frame as the studies used to generate the data sets for this HGMP. Please also review the coho statistics. What becomes evident quite quickly is that "Non desirable" chum and pink salmon runs....BOTH wild strains.....are quite hardy.

The question is why?

Additionally, why were the Green River wild coho "proved" out of existence in court citing Tribal Fisheries Biologists research? I have a friend who lives on a creek that is a Green River tributary. Prior to the court finding two seasons ago there were large wild coho in the creek annually. They were present last season and this season as well. However, now they legally "do not exist".

I believe the ongoing rehabilitation of ALL Green River Salmonids and Trout species must be central to our focus. Our policies/ implementations must be built upon this centrality regardless of money. I support brood stock hatchery efforts that build and protect natural stocks while allowing EVERYONE not just Commercial Fisheries access to harvest throughout the entirety of a system. Lets cut the fluff, work together, and remember....if we will not work together.... despite policies or laws or otherwise....these animals WILL become extinct.

In humility,

Austin

- 3) **From:** [lupus@tx3.net](mailto:lupus@tx3.net)  
**Date:** Thursday, December 20, 2012 9:33 PM  
**Subject:** Soos Creek Fall Chinook

When I was very young. Oh, boy was that a long time ago!!

My Grandparents had a hatchery on Soos Creek.

It was farther up the Creek, and I remember the building that the fingerlings where in. My Grandparents used to sell Salmon to many meat and fish markets in and around the Seattle area. The State of Wash. put a hatchery down stream from their hatchery and put them out of business.

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Donald B. Panton  
662 Klink St.  
Buckley, Wash. 98321  
[lupus@tx3.net](mailto:lupus@tx3.net)

- 4) **From:** Carl Searcy [[cedarstick@comcast.net](mailto:cedarstick@comcast.net)]  
**Date:** Thursday, January 03, 2013 9:40 AM  
**Subject:** Soos Creek Fall Chinook

My biggest concern for the Green River is the Native Steelhead and Chinook Salmon that have vanished in the last 20 years. I use to observe Chinook in the upper Green in large numbers in September and October and Native Steelhead in March and April up through the seventies. Why are the rearing ponds in Palmer now used to raise Chinook Salmon when they were built to raise Steelhead? The Green River is a lost river for Native fish. I do not see how this plan will protect the few that are left. I have been around this river since the late forties and before Howard Dam was constructed. Thank you for the comment period. Carl Searcy

- 5) **From:** [dataznperswayzn@aol.com](mailto:dataznperswayzn@aol.com)  
**Date:** Wednesday, January 09, 2013 5:28 PM  
**Subject:** Soos Creek Fall Chinook

To whom it may concern.

I seriously believe we should be using our hatchery facilities for something else.

I believe we should take our egg takes just as they are and plant them in selected parts of the river system.

no need for the iodine baths and such. let them be wild. based on evolution, they know how to return and mate by themselves. you all act like they are humans where they would be lost in the "wild"

They know their jobs and we should help the wild by planting raw fertilized unchemicalized eggs. don't wanna write a whole essay so ill keep t simple.

- 6) **From:** Don Huling [[dwhuling@comcast.net](mailto:dwhuling@comcast.net)]  
**Date:** Friday, January 18, 2013 10:49 AM  
**Cc:** Chris Ricketts; Karen Meador; Mark Brady; Kathy Fraser; Leah Boehm; Traci Felton; Jeff Guddat; Jean Williams; Nicholas Wells; Linda Worden; Greg Wingard  
**Subject:** Soos Creek Fall Chinook

I'm sorry this is so late (computer problems).

I read the subject management plan and had the following comments.

Sect 4.1)

...Heavy bed (siltation) loads are due to extensive watershed development. Winter floods are becoming an increasingly common occurrence due to continued watershed development.

**I don't suppose you have any worries about the huge development being planned for Pacific Raceways. Do you intend to make any comments to a proposed EIS for that development or will you ignore this as you did when the PR development ordinance was before the council?**

### **9.1.4) Incubation conditions.**

All eggs are incubated at Soos Creek Hatchery using surface water (Soos Creek); flow in shallow troughs is 10 gpm, and 12 gpm in deep troughs. Water temperature ranges from 32-50°F. Baskets are periodically flushed to remove accumulated silt since Soos Creek water is subject of heavy silt loads.

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The huge development being planned for Pacific Raceways will undoubtedly cause an increase in summertime water temperatures, and higher flow variations because of the loss of millions of cubic feet of gravel/groundwater storage mined from the PacRac site as well as the huge increase in covered ground area.

### **10.10) Emergency release procedures in response to flooding or water system failure.**

Soos Creek Hatchery. During severe flood events the screens are generally not pulled because floodwaters rise to the point where they breach the ponds. Past experience has shown that the fish tend to lie on the bottom of the pond during flooding events and only those that are inadvertently swept out are able to leave.

What happens during feeding and the fry come to the surface?

### **11.2) Indicate risk aversion measures that will be applied to minimize the likelihood for adverse genetic and ecological effects to listed fish resulting from monitoring and evaluation activities.**

Risk aversion measures will be developed in conjunction with the monitoring and evaluation plans.

How is risk aversion accomplished on man-made pollutants when no water quality/contamination testing/reporting is done? Apparently any genetic variation is assumed to be caused by natural pollution, since non-natural pollutants are not tested for. Therefore you have assumed any non-natural pollutants don't cause genetic variation, true? (This will be news to the scientific community.)

## **SECTION 12. RESEARCH**

### **12.1) Objective or purpose.**

Not applicable

How is this "Not applicable." when significant sampling and data is produced? This would indicate that nothing is done with the data, that no decisions are made dependent upon the data. Maybe most of the answers for section 12 should be "as previously described".

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I didn't see that when target numbers of spawners reaching Soos Creek Hatchery are met, and fish are kept to be sold, that the wild fish aren't transported and reintroduced into the Green at say Flaming Geysers Park.

I'm hoping these comments can be evaluated and addressed by revisions to the plan, and in the case of the future development of Pacific Raceways the DFW will actively raise the obvious concerns.

Sincerely,  
Don Huling  
17117 SE 329th St.  
Auburn, WA, 98092

- 7) **From:** Frank Urabeck [[urabeck@comcast.net](mailto:urabeck@comcast.net)]  
**Date:** Sunday, January 20, 2013 6:29 PM  
**Cc:** Scott, Jim B (DFW); Hoffmann, Annette (DFW); Hoffmann, Annette (DFW); Bosworth, Aaron (DFW); Bosworth, Aaron (DFW)  
**Subject:** Comments on the Green River draft HGMP

Brian:

As we discussed Friday, attached are my comments on the Green River draft HGMP. Thanks much for this opportunity. Looking forward to continuing to work with you, Christina and Kelly Cunningham, the new Deputy Assistant Director, Fish Program, on hatchery issues. Please see

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my last comment (#9) regarding a recommendation for a permanent WDFW hatchery advisor oversight committee. Such a committee, if modeled on the PSHAAC and the excellent work and relationships forged by Heather, might be useful to the department. If you have any questions, please contact me.

How soon might we see the final PSHAAC report? Will that be when it is formally submitted to the Fish and Wildlife Commission?

Take care and thanks again.

Frank Urabeck  
253-826-0282

### Draft Green River (Soos Creek)HGMP –Chinook Salmon Review Comments by Frank Urabeck January 18, 2013

1. It is evident that a lot of hard work went into this draft HGMP which reflects intense negotiations with the affected treaty fishing rights tribes. January 3 meeting with Jim Scott was very helpful in better understanding what went into producing this draft. It is good to know that the department agrees that whether undertaking a planning effort focused on a hatchery program or on a harvest program, considerations of both must be integrated into the process and reflected in the documents resulting from that being worked on at the time.
2. While I understand that the HGMP tracks the standard format provided by NOAA-F, there still should be a cover sheet or some other provision in the plan for the public to understand the context of Green River HGMP in terms of the overall ESA process, and the respective roles of the department, tribes and NOAA-F, leading to a federal government approved plan. What this means in terms of legal protection for defined hatchery actions, the provisions for adaptive management, and how long the plan has standing, should be spelled out. The existing format does not make it easy for a lay reader to readily understand the strategy for hatchery management and/or for harvest of Chinook salmon produced in the Green River basin.
3. Agree all our actions, department, tribal, NOAA-F and sport fishing/conservation stakeholders, should focus on advancing the conservation and recovery of wild Green River Chinook, while restoring and enhancing meaningful Green River hatchery Chinook harvest by both tribal and non-tribal fishers. Unfortunately, the strategy laid out in the draft HGMP is unlikely to do this. There is little reason to believe that implementation of the plan would result in significant increases in natural origin Chinook and expanded terminal area harvest opportunities on hatchery Chinook by sports in the near term. There is no question that tribal harvest would likely gain. This raises the issue of fairness and balance, especially as the public is footing most of the bill, and sports angler license fees cover much of the cost of the Soos Creek hatchery Chinook production.
4. An escapement goal should be established for harvest management that is based on natural origin Green River Chinook rather than continuing to rely on the goal of 5,800 natural and hatchery origin Chinook spawners, which has not been met in recent years. Also, dumping surplus hatchery Chinook into the Green River at the Whitney Bridge, to achieve the aggregate Chinook natural spawner goal, as has been done the last three years, and is planned for the foreseeable future, does not seem to be consistent with the FWC Policy C-3619 or the HSRG recommendations for the Green River.
5. The draft plan is not in compliance with FWC Policy C-3619 in that it does not fully use the principles, standards and recommendations of the HSRG to enhance the productivity and

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abundance of the wild population of Green River Chinook. Also, the department and the tribes are not mandated by the draft plan to pursue mark selective harvest in both the tribal and sports terminal area fisheries and through use of a seasonal main-stem weir that— like the Nisqually River weir – that would allow removal of hatchery Chinook and continued passage to spawning gravels of unmarked natural origin Chinook. The plan seems to treat all Chinook the same, i.e. saying that a “fish is a fish is a fish.” This flies in the face of FWC Policy C-3619.

6. The draft plan does not track the recommendations of the PSHAAC for the Green River HAIP. Request that elements of the PSHAAC recommendations be presented and discussed, at least, in the final HGMP or attached cover page, with reasons given for those advisor recommendations that were not carried forward as part of the plan. Those recommendations that are moving forward should be documented as part of the HGMP. In my view the plan in fact has a number of elements that are totally inconsistent with the PSHAAC recommendations, e.g. candidacy for higher viability goal (Contributing rather than status quo (Stabilizing)), implementation of new mark selective sports and tribal harvest fisheries, evaluation and implementation of two-stage integration, etc.
7. Understand now the reasoning behind the two Biological Phases of Restoration, Colonization and Local Adaption. However, the rationale for relying on surplus hatchery Chinook to be transported and released into the Middle Green River in order to achieve the 5,800 escapement goal needs to be better explained. Also, explanation should be provided of what is magic about using “900” and “1,500” average natural origin spawners observed in the main-stem for decision-making on the number of limited integration and highly integrated sub-yearling hatchery Chinook subsequently released at Soos Creek and Palmer under the two triggers. If this strategy is implemented there needs to be very close annual monitoring with annual reports documenting the performance of the new strategy as measured by the number and spawning location of the natural origin spawners. Also to be documented should be the natural origin spawners used for hatchery broodstock and where they were collected, e.g. Soos Creek hatchery, Icy Creek, or the Tacoma Headworks. Allowing tribal non-selective gill net fisheries on the surviving adults from the million vent clip only marked sub-yearlings released at Palmer would slow down the recovery of natural origin spawners. If these fish are being marked to promote their return to the Green River to enhance production of natural origin Chinook then all fisheries, including the tribal non-selective gill net fisheries, should be constrained until such time as the natural origin run consistently meets the natural origin escapement goal. If it is OK for the tribes to fish non-selectively on the returning vent clip marked adult Chinook then the sports should be able to also fish selectively on those fish with sport fishing regulations changed to allow retention of a hatchery Chinook with either vent or adipose clip or both in terminal areas of Elliott Bay and the lower Duwamish River – where the tribes now fish. Because of the excessive mortality associated with a ventral clip – 47% higher than with adipose clip—it really does not make sense to waste the Palmer facility production. An alternative, if every surviving adult from the one million sub-yearling Palmer production is critical to recovering natural origin production, would be for the tribes to fish selectively on only adipose marked hatchery Chinook – as sports are required to do in Puget Sound waters. Leaving the Palmer fish unmarked but with an appropriate number containing CWTs would allow maximum escapement of returning adults to reseed the main-stem Green River from Auburn to the Tacoma Headworks much faster than laid out in the draft plan. The long term intent should be to restore natural origin production to significant self-sustaining levels, consistent with the carrying capacity of the watershed. Also, selective fishing most likely would increase the number of Chinook harvested by the tribes over current non-selective fisheries that are constrained by the escapement needs of natural origin spawners.

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8. Because of the above concerns, if not resolved, I would oppose adoption of the Green River-Soos Creek HGMP as currently written.
9. Several of us that were members of the PSHAAC believe there should be regular and consistent citizen oversight of hatchery management, given all the un-resolved issues and changes in play. Accordingly, I request the department consider chartering a new permanent oversight advisory committee like the SCPAG, that might meet quarterly or at least once every six months to discuss progress on all hatchery relegated issues, and particularly monitoring the performance of the HGMPs. This group would also be useful for adaptive management changes in the various programs.