



Bob Zeigler
SEPA/NEPA Coordinator, WDFW Regulatory Services Section
600 Capitol Way North, Olympia, WA 98501-1091

RE: TOKUL CREEK HATCHERY DIVERSION DAM AND FISHWAY
REPLACEMENT DNS

Dear Mr. Zeigler,

The Snoqualmie Tribe submits the following comments regarding the proposed construction at the Tokul Creek Hatchery. We appreciate the opportunity to comment and the extra week to review the proposal. We would also like to point out that to the best of our knowledge we never received a formal notification or SEPA checklist regarding this proposal. We ask that in the future WDFW will send separate copies of notifications of projects in WRIs 7, 8, and 9 to our Tribal Chairwoman (Shelley Burch), Tribal Administrator (Matt Mattson), and Environmental Director (Cindy Spiry) at PO Box 969, Snoqualmie WA 98065. Thank you in advance for this courtesy of formal notification.

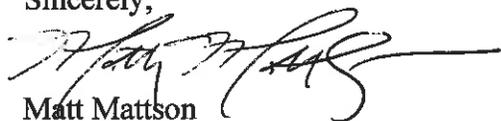
It is our understanding that WDFW has already secured a large portion of funding for the proposed projects, which total approximately \$12 million. While we are pleased that the state is willing and able to appropriate significant funds to projects aimed at increasing fish and wildlife abundance and productivity, we have some concerns about the specifics of this project, the high monetary costs of the project actions, and the Tokul Hatchery's impacts on wild fish.

Twelve millions dollars could do an incredible amount of good if directed toward wild fish recovery, and make significant progress toward Salmon Recovery Plan goals, which are significantly lagging behind temporal targets. The Tokul Creek Hatchery, as currently managed by WDFW, likely contributes negatively to the prospects of wild fish in the basin, not only due to its position in the Channel Migration Zone of Tokul Creek and the passage barrier that its intake diversion represents, but also through various competitive and other negative interactions between captive-reared and wild anadromous fish, which are increasingly documented in the literature and were also addressed by the HSRG. We suggest that instead of investing this large sum in continuing the status quo at the Tokul Creek Hatchery, that WDFW consider transferring the facility to the Snoqualmie Tribe and investing those twelve million dollars in salmon recovery in the basin instead. This would represent significant progress toward salmon recovery targets.

"Tokul" is a Snoqualmie word and the creek was historically the site of a major fish-processing center for the Snoqualmie Tribe. We support the workers at the hatchery and the contributions they make to the community. Due to differing philosophies and obligations, it is likely that the Tokul Creek Hatchery, if managed by the Snoqualmie Tribe instead of WDFW, could reduce or eliminate its net negative impact to the system

while retaining its community value. Anadromous fish runs in the Snohomish basin and Washington State continue to diminish, and so does availability of state funding for salmon recovery. The economic scale of the proposed actions at Tokul Creek Hatchery versus its efficiency in producing returning fish calls for this proposal to be reconsidered. We hope that you will re-examine this issue and its considerable price tag, consider our suggestions, and proceed with the best interests of salmon recovery in mind. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Mattson", with a long horizontal flourish extending to the right.

Matt Mattson
Tribal Administrator