



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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March 25, 2013

Mr. Robert Margulis
Executive Director
Wild Steelhead Coalition
117 E. Louisa St. #329
Seattle, Washington 98102

Dear Mr. Margulis,

Thank you for your letter regarding the SEPA Determination of Non-significance (DNS) issued January 4, 2013 for the Tokul Creek Hatchery Intake Diversion Dam and Fishway Replacement. The Washington Department of Fish and Wildlife (WDFW) has given consideration to the points raised in your letter and responds below with some background information for context.

Background

The focus of the Tokul Creek Intake/Fishway Replacement project is to provide fish passage and improvements at the intake that protect all fish near the facility. This project is the agency's on-going response to a 2003 Settlement Agreement between the Wild Fish Conservancy (formerly Washington Trout). Since the "Section 206 / Water Resources Development Act (WRDA)" project devolved into a WDFW-alone capital project, the agency has kept the project and funding requests going forward to the State Legislature. Adequate funding for project construction became available in the summer of 2012 and thus the environmental review under SEPA began on a project viewed as generally beneficial for fish.

The diversion dam, the third project component, was under consideration for removal in the original Section 206 project. This dam is in large measure now responsible for controlling movements of the streambed and its destabilization is a significant concern to the Department of Transportation (WSDOT). The Army Corps of Engineers Hydraulic and Sediment Analysis of Sediment Transport of Dam Removal at Tokul Creek Fish Hatchery (2004) references this concern and is attached with DOT's Tokul Creek Dam Removal: Review of USACE Analysis/Impacts to the WSDOT Infrastructure and Available Countermeasures (2005).

The anticipated capital budget requests for the Tokul Creek hatchery were posted incorrectly at the WDFW website. We appreciate you bringing these figures to our attention; the posting has been updated. The total for all Tokul Creek proposed projects, is just over five million dollars. Of that \$5 million, \$3.7 million is budgeted for this fish passage and intake improvement project.

With respect to the absence of a Habitat Action Implementation Plan (HAIP) or Hatchery and Genetic Management Plan (HGMP), and the project's relationship to the 2008 Statewide Steelhead Management Plan WDFW provides the following response.

WDFW has gone through an exhaustive review process of our hatcheries with federal agencies and the Hatchery Scientific Review Group (HSRG). That review process has led to operational changes

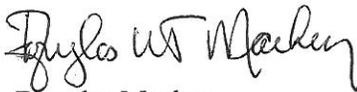
implemented at Tokul Creek Hatchery to reduce the impacts of steelhead programs on natural populations and to prioritization of capital improvement projects to provide unimpeded access to additional habitat for Chinook salmon. The operational changes include elimination of off-station planting of steelhead smolts and a reduction since 2008 in hatchery steelhead released into the Snoqualmie River from 250,000 to 150,000 smolts. The prioritization of capital improvements led to this project in accordance with the settlement agreement in the Matter of Tokul Creek Chinook, Washington Trout and Public Employees for Environmental Responsibility v. Jeffery P. Koenings and Washington Department of Fish and Wildlife, No. C02-1221 (W.D. Wash.).

Regarding the Habitat Action Implementation Plans (HAIPs), they were an important platform from which HGMPs began. As HGMPs became more important in the work with NMFS, WDFW spent more and more of their time working on HGMPs recognizing that completion of the HGMPs could occur before completion of the HAIPs. Since the submission of the HGMP for Tokul Creek Hatchery Steelhead in 2002, WDFW has been in consultation with NMFS regarding changes to programs or operations. These ongoing consultations informed the SEPA review and led to a determination of nonsignificance for this project. Currently, WDFW is in the process of submitting to NMFS updated HGMPs.

WDFW has considered your comments regarding the project's potential to have a significant adverse impact and believes the project will likely not have a significant adverse impact on the environment and that it has been properly evaluated under the State Environmental Policy Act.

Please write or call if you would like to discuss these matters further.

Sincerely,



Douglas Mackey
Fish and Wildlife Biologist
Washington Department of Fish and Wildlife
(360) 902-8380

Enclosures:

Hydraulic and Sediment Analysis of Sediment Transport of Dam Removal at Tokul Creek Fish Hatchery (2004)
Tokul Creek Dam Removal: Review of USACE Analysis/Impacts to the WSDOT Infrastructure and Available Countermeasures (2005)