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117 E Louisa St #329, Seattle, WA 98102

January 28, 2013

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

**RE: TOKUL CREEK SEPA DNS**

Thank you for the opportunity to provide comments to WDFW's Determination of Nonsignificance (DNS) of proposed work at the Tokul Creek Hatchery to 1) construct a replacement fishway; 2) remodel and screen the surface water intake and; 3) replace the water diversion dam, a mechanical building, as well as a retaining wall.

The Wild Steelhead Coalition does not believe that the DNS is supported and feel that a full Environmental Impact Statement should be conducted if the Department intends to proceed with this project.

We don't know of any Hatchery Action Implementation Plan (HAIP) or Hatchery and Genetic Management Plan (HGMP) that would cover either the Tokul Creek Hatchery or the Snohomish basin—and projects with the potential impacts of this one clearly should have those in place. The Department's 2008 Statewide Steelhead Management Plan requires that decisions impacting wild steelhead populations be science based with an underlying principle that wild fish recovery be given priority. I would be happy to provide you with a bibliography of over 100 peer-reviewed scientific studies that conclude that there is significant negative impact of hatchery introgression on wild fish. The diminishing escapement of wild winter-run steelhead on the Snoqualmie over a period of decades, with a growing number of hatchery smolt releases is a classic example of what these studies have concluded and what represents the mainstream of scientific thought on the topic.

The Wild Steelhead Coalition has considered many of the scientific and societal aspects of this project. Our assessment is that the Tokul Creek Hatchery enhancement proposal does not conform to Department's own goals and policies as outlined in the 2008 Statewide Steelhead Management Plan and would have significant and on-going negative impacts on the wild steelhead population. In addition, spending \$12 million dollars from the capital budget, with additional associated operating expenses, and even more tens of millions in consequential expenses for supporting infrastructure on the Tokul Creek Hatchery project is a waste of taxpayer funds that is even more egregious at a time when our state is in such dire financial straits.



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We look forward to having the opportunity to work with the Department on the recovery of wild steelhead in Washington and hope to see the Statewide Steelhead Management Plan embraced and aggressively pursued. We appreciate the opportunity to provide comments and would be happy to respond to any questions you may have or provide additional information that may be of value in this process.  
Sincerely,

*Bob Margulis*

Bob Margulis, Executive Director



**Sound Science+Smart Policy**

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