



2013 BOARD

LOWER COLUMBIA FISH RECOVERY BOARD

September 4, 2013

Tom Linde, Chairman
Skamania County Citizen Designee

Bob Zeigler
SEPA Responsible Official
Habitat Program
Washington Department of Fish and Wildlife
600 Capitol Way North
Olympia, WA 98501-1091

F. Lee Grose, Vice Chairman
Lewis County Commissioner

Randy Sweet, Treasurer
Cowlitz County Citizen Designee
Private Property Representative

RE: Comment on SEPA No. 13064

Taylor Aalvik
Cowlitz Indian Tribe

Dear Mr. Zeigler:

Bob Anderson
Skamania County Commissioner

The purpose of this letter is to provide comments on the proposed Determination of Nonsignificance (DNS) for the Cathlamet Channel Salmon Rearing Net Pens – Wahkiakum County issued August 19, 2013.

Blair Brady
Wahkiakum County Commissioner

The Lower Columbia Fish Recovery Board (LCFRB) was established by state law to oversee and coordinate efforts to recover Lower Columbia salmon and steelhead to healthy, harvestable levels. The LCFRB developed the NOAA-adopted Lower Columbia Salmon Recovery Plan¹ (Recovery Plan) in consultation with federal, state, tribal and local interests and is now working with agencies and other parties to implement the plan. The Recovery Plan is an integrated and systemic framework for recovering salmon and steelhead listed under the federal Endangered Species Act (ESA). The management of Lower Columbia fisheries is a key element in efforts to recover the region's salmon and steelhead populations. The Recovery Plan's harvest strategies, measures, actions, and impact targets are intended to further recovery efforts while at the same time maintaining viable sport, commercial and tribal fisheries.

Jim Irish
SW WA Cities Representative

Irene Martin
Wahkiakum County Citizen Designee

Tom Mielke
Clark County Commissioner

Todd Olson
Hydro-Electric Representative

Don Swanson
SW WA Environmental Representative

We have reviewed the DNS and have some concerns. Similar to the previous DNS regarding the Columbia River basin salmon management policy, the DNS for the Cathlamet Channel Net Pens lacks necessary detail. The proposed net pen project is part of a larger process that has not been clearly defined with respect to details regarding implementation actions; therefore, it is difficult to review this proposed action. The Cathlamet Channel Net Pens are being proposed as a single action – initiating a new Select Area site in Cathlamet Channel using spring Chinook. Similarly, in your response to LCFRB comments on the Commission's Policy on Columbia River Basin Salmon Management (SEPA No. 12084) you stated the DNS was also for one specific action: eliminating spring Chinook from the Deep River site and increasing coho production at the same site. The Board's concern is that implementing the plan incrementally through a series of separate actions does not allow for review of the overall plan to ensure that it is consistent with the Recovery Plan. While each action may not reach a level of significance individually, the effect of all actions may very well reach a level of significance cumulatively. The current process of reviewing only individual actions does not allow for that broader review for consistency with the recovery plan.

Dean Takko
WA State Legislative Representative

Charles TenPas
Lewis County Citizen Designee

Jade Unger
Clark County Citizen Designee

Dennis Weber
Cowlitz County Commissioner

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Jeff Breckel
Executive Director

¹ Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan, LCFRB 2010

The proposal for the Cathlamet Channel Net Pens assumes this strategy will be successful because fish will remain in the Cathlamet Channel and be available for harvest for a period of time. This assumption is based on the fact that the fish are acclimated in net pens located in Cathlamet Channel; however, since Cathlamet Channel is a major side channel of the Columbia River this assumption may not be correct. A similar net pen rearing effort for coho in Steamboat Slough was discontinued due to lack of homing to the release site and continued migration upstream into the Elochoman River. Cathlamet Channel is very similar to Steamboat Slough; therefore, the potential exists for returning adult spring Chinook to be unable to effectively home to the release site and return to lower Columbia River tributaries instead. Additionally, if the fish do not spend an adequate amount of time in Cathlamet Channel, due to ineffective acclimation to the release site, they may not provide the catch necessary to support a Select Area commercial fishery.

As new actions are proposed to implement the Columbia River Basin Salmon Management Policy, plans to monitor the outcome and potential impacts of these new programs needs to be clearly articulated and implemented. The proposal for the Cathlamet Channel Net Pens contains no information regarding monitoring either the fishery or escapement. Management of this proposed program to achieve fishery and Recovery Plan goals will require an adaptive management approach, and data regarding harvest in fisheries and escapement to natural spawning locations will be necessary to implement an adaptive management approach. Monitoring escapement will provide the data necessary to confirm the Hatchery Scientific Review Group (HSRG) statement and the Department's claim that a spring Chinook net pen program in Cathlamet Channel poses no risk to pHOS for tule fall Chinook due to differences in spawn timing and lack of nearby suitable habitat.² The monitoring program should also include a unique marking strategy for releases from the Cathlamet Channel Net Pens for the purposes of: 1) identify returning adults in natural spawning locations and 2) ensure that returning adults that stray to Cowlitz Salmon Hatchery are not incorporated into the brood stock used for the Cowlitz Spring Chinook program. The DNS for the Cathlamet Channel Net Pens should articulate what information will be collected and how that information will be collected as part of the overall monitoring plan for the Columbia River basin salmon management policy.

The proposed DNS for the Cathlamet Channel Net Pens focuses on impacts to listed spring Chinook, primarily those destined for the upper Columbia Basin. This fishery will occur during March through May, which is the peak migration time for wild winter steelhead destined for lower Columbia River tributaries. Assessment of impacts from the Cathlamet Channel Net Pen project, and resulting fisheries, needs to include wild steelhead, especially those destined for lower Columbia River tributaries such as the Elochoman River.

Information provided in support of this action included the BPA document 6450-0 1-P entitled Finding of No Significant Impact for Lower Columbia River Terminal Fisheries Research Project. It is important to note that this finding occurred in April 1995, and many significant changes have occurred since that finding.

² "The Hatchery Scientific Review Group (HSRG) provided the Columbia River Work Group with a report of the proposed new production in their November 9th, 2012 draft document titled 'Additional HSRG Preliminary Analysis of Management Strategies for Columbia River Recreational and Commercial Fisheries.' In it they stated 'Increased spring Chinook production described in both the short and long term in off-channel areas do not pose additional risk to pHOS limits for fall Chinook (Tule) populations in the lower river because of the difference in spawn timing between spring and fall Chinook populations and the lack of nearby spring Chinook populations and acceptable habitat.' The spring Chinook production from a potential net pen release in Cathlamet Channel was not specifically included in the analysis, but current production of spring Chinook has been from Deep River net pens. The closest spring Chinook population is from the Cowlitz River." [WDFW response to comments, January 20, 2012]

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At the time of this finding there were only 3 ESA-listed salmonid species and all were Snake River stocks. Now there are 13 listed species, including Lower Columbia Chinook, coho, steelhead and chum. Additionally, the scope of the project has changed significantly since this finding was issued. The project, as envisioned in the 1995 document, was a 10-year terminal fisheries research project that has now expanded into the Select Area Fishery Enhancement (SAFE) Project. Production associated with the current SAFE project includes more species in more locations and at significantly higher production levels than reviewed at the time of the Finding of No Significance. Finally, data regarding straying presented in the 1995 document was primarily limited to coho, and since that time it has been documented that Select Area Bright (SAB) fall Chinook released in Youngs Bay and spring Chinook in Deep River are straying into the Grays River. Given the many changes, including the significant change in scope that have occurred since the 1995 Finding of No Significance, the LCFRB questions the adequacy of this document in supporting the action proposed in the Cathlamet Channel DNS.

Given the lack of an overall strategy and plan for implementing and monitoring the Columbia River Basin Salmon Management Policy, the continued implementation of parts of this plan through individual SEPA DNS proposals is inappropriate. It is not possible to assess the cumulative environmental impacts of the proposed actions when the actions continue to be proposed and reviewed in the absence of an overall implementation plan. We urge the Department to consider putting the SEPA process on hold until a detailed implementation plan for the Columbia River Basin Salmon Management Policy is completed.

We appreciate this opportunity to comment and look forward to assisting the Fish and Wildlife Commission and Department to develop a fisheries policy that is consistent with and supportive of the Lower Columbia salmon and steelhead recovery efforts.

Sincerely,



Jeff Breckel
Executive Director

Cc: Tom Linde, LCFRB Chairman
Blair Brady, LCFRB Commissioner Designee for Wahkiakum County
Irene Martin, LCFRB Citizen Designee for Wahkiakum County
Guy Norman, Director, WDFW Region 5
The Honorable Dean Takko, WA Legislature, 19th District