WDFW Hatchery and Fishery Reform Policy Review Stakeholder Interview Summary

Prepared by Triangle Associates, Inc. v. April 3, 2019

The Washington Department of Fish & Wildlife (WDFW) is in the process of reviewing all sections and aspects of the Hatchery and Fishery Reform Policy (C-3619). This Policy has not been reviewed since its adoption in November 2009, and the Washington State Fish & Wildlife Commission has directed WDFW to review the performance of the Policy since its adoption, update scientific elements of the Policy, and update the language of the Policy. WDFW is connecting with tribal co-managers, as well as members of the public, in order to get a wide range of input on the policy review and revisions.

Rachel Aronson and Simone Barley-Greenfield from Triangle Associates (Triangle, facilitation team) conducted interviews with key stakeholders connected to the Hatchery and Fishery Reform Policy to gather feedback on the existing Policy, its recent suspension, and the upcoming review and revision process. These interviews were intended to reveal the range of issues and concerns across all stakeholders and to synthesize perspectives and goals for the future.

Interview Summary

The following is a summary of themes and comments heard in the phone interviews Triangle conducted with stakeholders from the policy, science, fishing, and conservation communities regarding their thoughts and opinions about the ongoing review of the Hatchery & Fishery Reform Policy. The summary is arranged by topic area and does not attribute comments or perspectives to individual people. A few individual comments that represent the wide range of ideas expressed during the interviews are also included.

This assessment is a preliminary indication of the perspectives on this topic. Triangle aimed to interview enough individuals to capture the diverse perspectives that exist regarding the Hatchery & Fishery Reform Policy and the decision to review it. Perspectives captured represent only the interviewed sample of hatchery reform stakeholders and do not represent a state-wide complete survey.

Overview

Almost all the interviewees mentioned that they viewed the decision to review the existing Hatchery & Fishery Reform Policy and the science that informs it very favorably because they believe it is important and appropriate to periodically revisit polices to ensure they are working and reflect the best available science. A common theme was the acknowledgement among almost all interviewees that salmon populations have continued to decline, and many stakeholders voiced their desire for something in the Policy to change to better address this reality. Stakeholders articulated a variety of perspectives on what needs to change to address this continued decline, but the majority agreed that any changes to the Policy must be based on the best available science.

"No one objects to the decision to review the Policy, it is really important to check on things that you have put in place."

"This [issue] is too critical to rush [the agency's review]."

Opinions regarding the existing Hatchery & Fishery Reform Policy were generally in three categories:

- 1) Very much in favor of the guidelines contained in the existing Policy.
- 2) Supportive of the existing Policy, with the acknowledgement that implementation in some areas was lacking.
- 3) Very much against the existing Policy.

Opinions regarding the decision to suspend Guidelines 1-3 of the Hatchery & Fishery Reform Policy were generally polarized in two categories:

- 1) Very much in favor.
- 2) Very much against and confused as to why the guidelines had been suspended.

The major interview themes reflect this diversity in opinion.

Major Interview Themes:

The following major themes came through clearly in most of the stakeholder interviews:

• The importance of reviewing the science: Nearly every stakeholder expressed their belief that reviewing the scientific basis of the Hatchery & Fishery Reform Policy using the current best available science and data was a valid exercise by WDFW..

"Science should be open for review all the time."

"Science is never stagnant."

"If there is new science that the [science] review uncovers and incorporates into the revised Policy, I would be supportive of that."

Different stakeholders mentioned different research and studies to support their own perspectives. Some stakeholders cited science indicating that increasing hatchery production is detrimental to wild salmon recovery while others mentioned studies that show that hatcheries do not have as deleterious an effect as most people think.

A contextual lens that was mentioned by many stakeholders was that the existing Hatchery & Fishery Reform Policy had only been in effect for 10 years, approximately two life-cycles for Chinook. Some stakeholders felt this was not enough time to assess whether the Policy was successful. "This policy has only been implemented for a few fish lifecycles and now the Commission has pulled the rug out. The commission didn't recognize the time period that will be needed to see a response." "Chinook lifecycle is 4-5 years...that is two generations for HRFP...they all remember the good old days."

• The suspension of Guidelines 1-3: Many interviewees expressed frustration and confusion over the decision to suspend Policy Guidelines 1 – 3 while the Policy is under review. These stakeholders felt that there was no evidence to support suspending these guidelines and were very concerned that an explanation had not been offered to justify the decision. These stakeholders felt this demonstrated a troubling lack of transparency that undermined their trust.

"The Commission has not done its own work to suggest that [guidelines] 1-3 don't make sense and then decided to suspend them — it feels like it was done for political reasons. Unless they have good information to suggest that those are inappropriate, why would they suspend them?"

On the other hand, some stakeholders stated they were glad that what they view as flawed guidelines are no longer in effect because they felt it forced the issue of whether or not the Policy is working. "[The decision to suspend guidelines 1-3 is the] best thing to happen in a long time."

• **Policy implementation:** Some stakeholders feel the contents of the policy are well-intended and justified, but the implementation of the policy by WDFW has fallen short.

"There is often a difference between what a policy says it will do and the timeline, and when it actually gets done and to what degree of completeness it gets done."

"No question that the goals are good goals. Agree with all 3 [guideline]. It's the execution of the management and recovery plans where there's some question"

Stakeholders noted that issues with implementation could be attributed to a number of factors outside the scope of the Hatchery & Fishery Reform Policy including:

- Restrictions from other laws and policies such as the Endangered Species Act and the National Oceanic and Atmospheric Administration (NOAA) administration of that law
 - "The state of fisheries is more due to the ESA and poorer ocean survival."
- Funding
 - "It is not sufficient to fund a hatchery without funding monitoring and evaluation."
 - "The [state] budget isn't going to support more hatcheries, so funding will get tighter."
 - "Hatcheries are just like a business; you have operating and maintenance expenses that go up every year. If Agency funding does not keep pace...deferred maintenance is an issue."
- External environmental factors affecting salmon: Interviewees recognized that the tepid recovery or decline of fish stocks was affected by many non-hatchery factors. Interviewees differed in how they felt the Agency should consider these external factors in its review of hatchery policy.
 - External environmental changes (urbanization, climate change, increased predation at dams)
 - "Less habitat is not made up for by putting more fish into the remaining habitat...you have to operate these hatcheries in light of the capacity of the habitat to support populations."
 - Poor ocean conditions (declining productivity, ocean acidification)
 - Natural variation in the external environment
 - "Variation is the norm swings in annual abundance is what to expect when dealing with salmon."
- The necessity of clear, thoughtful goals for the Policy: Many stakeholders mentioned the need to think carefully and intentionally about the goals that the Hatchery & Fishery Reform Policy is intended to help achieve. Most stakeholders felt that the Policy would benefit from revisiting these goals and developing a clearly articulated, quantifiable vision for the future of salmon in the region and the role hatcheries will play. Many stakeholders noted that different goals, such as protecting and restoring wild fish or maintaining commercial and recreational fishing opportunity, will drive different sets of actions. "It is very important to work to achieve agreement about goals for fish populations and fishing opportunity before you decide on a set of policies and goals."
 - "Before you know how many baby salmon to produce, you should know what you are trying to accomplish."
 - "Washington has not asked what is our goal for a successful ocean fishery, a successful Puget Sound fishery, and how do we measure that?"
- Southern Resident killer whales: Some stakeholders expressed their desire to see hatchery production increased in order to provide more fish to feed the declining orca population in the region. They blamed the restrictions on hatcheries for the lack of prey availability for the orcas. Other stakeholders were skeptical of the effectiveness of boosting hatchery production to feed the orcas and expressed concern that such actions were hasty and would undermine salmon recovery efforts around the region. "There's a lot of pressure to increase production for orca. [We] need to make sure we are realistic about orca because we could undermine salmon recovery."

• The transparency of the political process: Many stakeholders expressed concern about the interests driving the policy-making and management decisions surrounding the Hatchery & Fishery Reform Policy. Some stakeholders are concerned that the policy-makers are not focused on what is best for the natural environment and fish while others are concerned that the policy-makers are not focused on supporting the culture and way of life central to the people of the Pacific Northwest.

"Specific user groups are driving the process."

Some stakeholders expressed concern that their input from these interviews would not be addressed in a meaningful way while their participation would be leveraged to justify the final results of the public process. They did not want their engagement in the assessment to be used as a "rubber stamp" or to "sprinkle holy water" on the process.

Outside-the-box thinking: Some stakeholders expressed a desire to see more creative solutions
developed and implemented to achieve the goals of the Hatchery & Fishery Reform Policy. Many
stakeholders observed that those involved in this conversation have often become entrenched in one
mindset to the detriment of creativity and innovation.

"There are lots of opportunities to increase production without running of afoul of existing policy guidelines."

"There are ways to increase prey [for orcas] that are consistent with recovery, like being careful and selective about which hatcheries are used."

"We need to think outside the box and try different things."

Many stakeholders had ideas for more innovative strategies for the agency to pursue under the H&FRP. Some recommended spending more time researching alternative fishing gears, broadening the management perspective from a program focus to a more holistic focus (population, river, watershed, or ESU), and thinking creatively about production and hatchery infrastructure (shifting production between hatcheries; performance rather than production goals). Some stakeholders also expressed a desire to see more of a focus on ecosystem interactions between hatchery fish and wild fish in addition to genetic interactions and fish fitness.

• **Gear management:** The topic of gear and gear management came up in a number of interviews. Some stakeholders expressed deep concern related to gillnets. Some wanted to see more research and investment in alternative fishing gear that works for fishermen.

Agency Process for Public Engagement

Below are some of the initial ideas that stakeholders had for communications going forward:

- Many stakeholders highlighted the need for open and transparent communications between WDFW and the public during the review process.
 - "Unfortunately, I do not think the State always has an open dialogue. They often say what they think we want to hear, not what we need to know."
- Stakeholders whose organizations receive hatchery-related funding expressed a need for WDFW
 to be prepared to speak with them on how changes to the current Policy will affect their funding.
- Many stakeholders also requested that WDFW be prepared to speak to how changes to the Policy might impact each stakeholder group specifically.
- Several stakeholders requested that all materials and documents used by the state in decision-making be made available for stakeholders to review prior to any public meetings. These

[&]quot;You cannot have people with financial gain in the mix trying to stifle the voice of others."

- stakeholders also noted that it was important that materials be made available well in advance to allow enough time for review and developing questions and discussion points.
- Several stakeholders requested the use of visuals to accompany any information that was shared during public meetings and presentations.
- Stakeholders expressed a desire to see the results of this assessment posted where it is accessible to the public.
- Some stakeholders recommended having public engagement held on a regional scale rather than having meetings solely in the Olympia area.
- Stakeholders recommended email and online bulletins as places to post communication materials.

Miscellaneous Comments

- A few comments were heard about perceived biases in the original process to create and adopt the Hatchery & Fishery Reform Policy.
- It was mentioned that Hatchery Scientific Reform Group had not had the opportunity to present to the Fish & Wildlife Commission for some time.
- Wild Salmonid Zones were highlighted as an underutilized tool and the need to establish those zones.
- A few stakeholders raised the topic of marine mammal predation and the need to address predation moving forward.
- Some stakeholders cautioned that changing the HRFP could undermine the recovery plans that were developed with its guidelines in mind.
- A comment was made recommending the use of modeling to frame proposed hatchery actions in the context of habitat (All H Analyzer).
- It was also recommended that hatchery programs undergo financial audits.
- More information is desired on the Agency's plans to use the Washington Academy of Sciences
 (WAS) as an independent review panel and the potential for other external scientists to contribute to
 the policy review.

Attachment 1: Interview Participants

| Name | Affiliation |
|-----------------------|---|
| Andy Appleby | Hatchery Scientific Review Group (HSRG) |
| Andy Marks | Coastal Conservation Association |
| Butch Smith | Coho Charters |
| Dave Croonquist | WDFW Sportfish Advisory Member |
| Frank Urabeck | Multiple Previous Advisory Roles |
| Greer Maier | Upper Columbia Salmon Recovery Board |
| Jamie Glasgow | Wild Fish Conservancy |
| Jason Mulvihill-Kuntz | King County - WRIA 8 |
| Jeanette Dorner | Mid Sound Fisheries Enhancement Group |
| Michael Schmidt | Long Live the Kings |
| Randy Babich | Puget Sound Purse Seine |
| Rob Masonis | Trout Unlimited |
| Ron Garner | Puget Sound Anglers |
| Sara LaBorde | Wild Salmon Center |
| Steve Manlow | Lower Columbia Fish Recovery Board |