



February 14, 2020

Conveyed via email

Ron Warrens
Chief of Fisheries
Washington Department of Fish and Wildlife
Olympia, WA

Re: Proposed Calawah River Brood Stock Program

Dear Ron:

The Conservation Angler (TCA) believes the WDFW proposal to move the existing early-return-timed wild steelhead brood stock program from the Bogachiel River to WDFW facilities on the Calawah and for subsequent release into the Calawah River requires evaluation under SEPA regulations.

TCA believes the proposal contains a number of important departures from the program authorized on the Bogachiel. Together, they represent a significant departure the existing Bogachiel River program which require the normal SEPA review process rather than a finding of non-significance. Specifically:

- a. The transfer proposal does not specifically limit the number of wild fish to be used or specify that only the first 25 wild fish captured will be utilized for brood (i.e. no replacing smaller fish caught earlier may not be replaced by larger fish caught later);
- b. specific temporal selection of wild fish across the season. The Bogachiel program specifically stipulates that the brood stock must be caught in December-January period;
- c. annual reports required under the WDFW-OPGA agreement (reporting on survival by stage: egg to eyed egg; eyed egg to juvenile and so on) have not been circulated to the public;
- d. The Bogachiel program stipulates that smolts will not be reared/released in the lower river and specifically rejected using WDFW facilities at the Bogachiel hatchery and the OPGA was specifically charged with the responsibility for identifying, permitting, funding construction of the acclimation facility; funding the operation of the acclimation facility (feeding, cleaning, water sampling, etc.). The proposal violates all these stipulations;
- e. strict disease protocols,
- f. specific marking protocols, and
- g. annual performance reports –see d. above.

Absent specific WDFW stipulations along the lines outlined above, the proposal is, in fact, a significant departure requiring a regular SEPA process to include a detailed proposal, including

alternatives, as well as an analysis of the impact the existing Bogachiel program has had over the past ten years or so of operation on wild stocks.

Additionally, if the rationale to make this move is that the Bogachiel River is often unfishable (murky water from the upstream slide), TCA recommends that WDFW simply cancel the existing Bogachiel hatchery program altogether and manage the entire Quillayute system as a wild steelhead management zone.

TCA could be supportive of this proposal if there was a longer vision in which the following analysis was completed by WDFW and stakeholders in a regular SEPA process:

- a. determine if the program is even feasible,
- b. monitor effects and set criteria for performance (i.e. like the Bogachiel Program, above),
- c. if the program were to perform and impacts are limited, then WDFW should reduce the Chambers Creek hatchery and move to a properly designed and monitored brood-stock.

TCA suggests WDFW investigate alternatives in a new SEPA process which could shift the timing of the tribal fishery towards March and April. This could be important to help recover the early-run timing by shifting harvest and broodstock collection to the heart of the run. The wild steelhead population would benefit from reduced fishing intensity early in the season (providing rebuilding of the November-February run-timing) and allow cessation of non -indigenous Chambers Creek program.

Such a plan would, necessarily select brood stock from across the entire run timing. This criterion will meet HSRG guidelines which requires not just enhancing a single portion of the run but helping restore the entire run timing.

TCA remains skeptical of broodstock programs generally, as the record is devoid of real conservation or even increasing abundance over simply leaving the wild fish in the river to breed naturally. We note that wild brood stock programs that have not worked as proposed:

- Skagit -- Wildcat Steelheaders late returning brood stock program;
- Solduc – OPGA early brood stock program; over 25 years of operation, the program produced fewer returning adults than natural production;
- Hood Canal wild brood stock has not resulted in lasting increase in wild populations;
- Bogachiel – OPGA a bit unclear since we have not seen any of the required annual performance reports. Regardless, we will expect WDFW to comply with the reporting requirements from the Bogachiel program and do the same work and reporting on the Calawah.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. St. John', written in a cursive style.

Pete Soverel
President, The Conservation Angler

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