



February 14, 2020

Lisa Wood
SEPA/NEPA Coordinator
WDFW Habitat Program, Protection Division
P.O. Box 43200
Olympia, WA 98504-3200

RE: Calawah steelhead hatchery SEPA

Dear Lisa Wood,

Trout Unlimited (TU), the nation's oldest and largest cold-water fisheries conservation organization dedicated to protecting and restoring our nation's trout and salmon resources and the watersheds that sustain them, appreciates the opportunity to comment on the SEPA determination of non-significance (DNS) for the proposed Calawah wild steelhead broodstock program at the Bogachiel hatchery (DNS 20-004).

Our comments are three-fold:

1) We disagree that increasing the number of hatchery steelhead smolts in the Calawah River would not have a significant effect on wild steelhead in the Calawah River. However, given our discussions with agency staff and the guides we believe there is a successful path forward if this program is operated within the context of a longer-term vision for steelhead fishing on the Olympic Peninsula (OP).

That vision includes, 1) collecting broodstock over the entire period of the run, not just the early component in January, 2) establishment of performance criteria, such as smolt-to-adult-survival and the number of returning adults that are produced for and captured in the fishery,

2) assurances that the smolt release location will not deviate from the Calawah/Bogachiel Hatchery rearing ponds, 4) implementation of a monitoring plan capable of determining whether the program is meeting its performance criteria and can also estimate the rate of residualism and precocious males, pHOS and genetic effects, and the spatial and temporal distribution of spawning adults, and 5) a timeline for evaluating the future of the program based on the monitoring and research data. Discussions with James Lohse indicate the Department also views these as important steps and we appreciate the outreach James has accomplished to this point. Still, discussions to this point have been preliminary, and as such, it is important that the goals and monitoring questions be solidified before moving forward at full speed with the broodstock program.

3) Given the above, we suggest the Department establish a working group on the west end of the OP in the town of Forks. The Department established an advisory group in 2015 (which TU was a part of) to help guide implementation of new sport angling rules for steelhead on the most popular OP rivers. A similar effort would help evaluate the overall trajectory of hatchery steelhead releases in the Quillayute system. We are concerned because releases of Chambers Creek smolts has increased over the past two decades and we are not supportive of the overall proposal if the only goal is to simply increase hatchery production in one of our last best remaining wild steelhead rivers. Rather, we see this as an opportunity to complete the advisory group process that was initiated in 2015 (where we agreed the final step was to discuss hatchery programs) and reconvene a group of stakeholders that can help and participate with the Calawah program and then, upon completion of monitoring and evaluation, use those results to find a common vision for hatchery steelhead in the Quillayute system.

Ultimately, we view the west end of the OP as our best last remaining wild winter steelhead fishery in Washington. The fish and the fishery provide important cultural and economic benefits. The reason people love the OP is because of the large wild winter steelhead. We want to ensure the fishery remains strong and sustainable so that all people can enjoy its benefits. This process, if conducted transparently and with stakeholders, can be an important part of that achieving that goal.

Please feel free to contact us with any questions or proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lohse", written in a cursive style.

John McMillan

Science Director, Wild Steelhead Initiative

Trout Unlimited

John.mcmillan@tu.org