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To: [SEPADesk2 \(DFW\)](#)
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Subject: RE: SEPA response
Date: Thursday, April 23, 2020 4:42:29 AM

During the comment period for the SEPA associated with the proposed Calawah wild steelhead broodstock program at the Bogachiel hatchery (DNS 20-004) we received three separate written comments. Commenters included 1) Trout Unlimited, 2) Wild Steelhead Coalition and 3) The Conservation Angler. Below is a summary of comments (in italics) and WDFW's response. In addition to these response we are working to develop a more comprehensive document that summarizes work in the Calawah River and neighboring tributaries to understand the role of a wild broodstock program in the Quillayute system and describe interaction these fish have with wild steelhead in the Calawah and neighboring tributaries. This document will communicate clearly to scientists, managers and the general public the intent of this project and will rely on the contributions and future collaboration of the three commenters above.

1) Trout Unlimited

"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)."

WDFW: We appreciate the collaborative approach Trout Unlimited seeks and will do our best to support it and operate this and other programs in the area with the longer-term vision for steelhead fishing. Trout Unlimited have provided more feedback on this approach since the SEPA was issued.

That vision includes, 1) collecting broodstock over the entire period of the run, not just the early component in January,

WDFW: We agree and have proposed this strategy in our draft plan

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

WDFW: We currently collect this information and have proposed an improved strategy in draft plan.

2) assurances that the smolt release location will not deviate from the Calawah/Bogachiel Hatchery rearing ponds,

The current plan is to acclimate and release fish from the Bogachiel hatchery.

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.

WDFW: All of these criteria will be met.

3) Given the above, we suggest the Department establish a working group on the west end of the OP in the town of Forks.

A working group is a good idea and we plan on discussing this idea more thoroughly with the commenter. We would prefer the working group achieve a broader goal than that of this project and include stakeholders in other parts of Region 6. In addition, we already have working groups that exist with guides, comanagers and general public but increased coordination with the communities that Trout Unlimited represent is desired.

2)The Conservation Angler

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);*

WDFW: Not settled yet as we are running a few models. Leaning towards 30 fish if live spawning to get release 30k to 35k.

- 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;*

WDFW: We seek to understand an alternative to broodstocking early. HSRG recommends broodstocking from entire run and this strategy has been suggested as a tool to relieve fishing pressure on the early portion of the run. We are planning on collecting broodstock from January to April and look forward to collaboration on final plan for a well defined study period and evaluation.

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;

WDFW: I am not certain that annual reports were not created but this could be remedied by including these evaluation criteria in final project plan. We hope the future program includes robust evaluation completed by all those involved including the conservation angler and WDFW.

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;

WDFW: We feel the best strategy for this program would come from a rearing and release strategy in the lower river to reduce the risk of genetic introgression upstream and increase exploitation on returning hatchery adults at the confluence of the Bogachiel and Calawah River? Much of the failure or success of this program was infrastructure. We now have ponds to start and acclimation facilities for release.

e. strict disease protocols,

WDFW: This program includes plans to follow Comanager Fish Health protocols consistent with other facilities in the area.

f. specific marking protocols, and

WDFW: Our plan includes CWT and adipose fin clipping for all juveniles from this program. Additionally, we have drafted an alternative that also includes Passive Integrated Transponder (PIT) tagging of juvenils to determine rates of residualiation, specific rates or return and life history however funding has not been identified for the PIT tag component. This and other proposals will be refined with collaborators including the Conservation Angler.

g. annual performance reports –see d. above.

WDFW: We agree that brief annual reports are beneficial for project tracking but also plan to produce more comprehensive documents (peer reviewed papers, grey literature) at the end of the study period (5-7 years of returning brood) comparing performance of a variety of hatchery programs in the Quillayute River. These reports would then contribute to the larger understanding of steelhead hatchery programs in the area.

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,*

WDFW: Based on discussions with hatchery staff and operations specialist this program has been determined feasible. However, we are exploring numerous changes to hatchery practices for the Bogachiel team (volitional release, 2 year smolts, sampling adults proportional to natural run timing. This changes will require flexibility by hatchery staff and project collaborators to achieve success.

b. *monitor effects and set criteria for performance (i.e. like the Bogachiel Program, above),*

WDFW: We agree with this and we look future work with The Conservation Angler to define specific performance criteria.

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.*

WDFW: One goal of this program is to compare performance criteria with neighboring programs like the early-times Bogachiel program. Work is being done currently to compare release strategies with guidelines laid out by the Hatchery Science Review Group and The Statewide Steelhead Plan. Additionally, we are working to develop a study design that scales hatchery releases in the basin to allow for a robust comparison of rates of survival and recruitment to fisheries of hatchery programs in the basin. Both of these exercises may require a change to release numbers of the early timed (Chambers Creek origin) fish.

3) Wild Steelhead Coalition

we offer conditional support for this program assuming the following conditions are met:

1. *We must monitor the effects of the broodstock program on wild fish and set strict criteria for performance. If the program fails to perform adequately and/or has an excessive impact on wild fish, it should be shuttered.*

WDFW: An extensive monitoring program is needed for this program that compares

performance criteria to neighboring programs. We hope Wild Steelhead Coalition will collaborate on these efforts to develop a long term strategy based on what we learn from this project.

2. If the program performs well and the impacts on wild fish are tolerable, then the department should reduce Chambers Creek stock and move towards a larger implementation of the broodstock program.

WDFW: While there is currently no plan to increase the wild steelhead broodstock program beyond 35 to 50k release the results of this work and associated science papers will inform future hatchery plans in the area. As mentioned above, work is being done currently to compare release strategies with guidelines laid out by the Hatchery Science Review Group and The Statewide Steelhead Plan. Additionally, we are working to develop a study design that scales hatchery releases in the basin to allow for a robust comparison of rates of survival and recruitment to fisheries of hatchery programs in the basin. Both of these exercises may require a change to release numbers of the early timed (Chambers Creek origin) fish.

3. If this transition does occur then the tribal fishery should shift towards March and April. This shifting of the tribal fishing season would reduce pressure on the fish run from November – January, allowing the critical front end of wild steelhead run to rebound.

WDFW: The Quileute Tribe is a partner in this program but their fisheries targeting steelhead are not managed by the state. While fishing plans are not currently part of this project proposal, results from this research will provide insight for fisheries plans with the ultimate goal of designing and supporting fisheries that maximizing conservation benefit and fishing opportunity for state and tribal fisheries. That said, we share the concern for steelhead returning at the beginning of the spawning season and wish to promote fisheries and hatchery programs that support life history diversity for wild steelhead, especially given an increasingly changing climate.

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