

# **FWC – Fish Committee Co-Manager Hatchery Policy Public Comments Summary March 16, 2023**

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# Outline of Presentation

- Description of public comment period
- Procedure to bin comments into specific categories, in particular:
  - “Support for” or “Opposed to” draft Co-Manager hatchery Policy
- Distribution of comments with respect to bins
- Summary of “Support for” comments
- Summary of “Opposed to” comments
- Next steps
- Revised calendar



# Public Comments

- Policy posted and comments submitted at:  
[Co-manager hatchery policy development | Washington Department of Fish & Wildlife](#)
- Comment Period: February 7 – March 1, 2023
- “Support” for Co-Manager Hatchery Policy
  - Explicit statement of support
  - Statement urging us to pass C-3624
  - Pro-hatchery statements or sentiment
  - Encourage WDFW to conduct SEPA on existing draft policy
- “Opposed” to
  - Conditional



# Distribution of Comments

Category	Number	Percentage Total (blanks removed)
Support	280	87% (94%)
Opposed	4	1% (1%)
Unrelated	14	4% (5%)
Blank (no comment)	24	7%
	<b>322</b>	

- Needs Work  
**16 (5%)**
- Don't trust WDFW:  
**3 (1%)**
- Don't trust Tribes:  
**2 (1%)**
- Duplicated Comments:  
**75+ (25% +)**
- Comments without names or addresses:  
**14 (5%)**



# Support Comments Summary #1

- We need more hatchery fish for fisheries
  - Absent is the belief that more fish can be accomplished without hatcheries
- Hatcheries are needed because habitat now cannot support natural spawning fish
- Hatchery fish help to support SRKW
- Hatchery benefits equal hatchery risks in terms of hatchery management
- Move draft policy to SEPA stage
- More hatcheries while working to improve habitat
- Hatcheries reduce fishery stress on wild populations



# Support Comments Summary #2

- Climate change and decline in ecosystem quality necessitates hatchery production – good for wild populations
- Hatcheries generate fisheries; fisheries generate revenue
- Co-Manager Hatchery Policy should include explicitly:
  - How does the draft policy supersede C-3624?
  - Language committing stakeholder participation is regional/watershed hatchery plans
  - Language that acknowledges state and affected tribes jointly defend hatcheries from third-party lawsuits
  - Review of genetics data to evaluate the efficacy of current “performance measures”
    - Assuming “performance measures” mean HSRG’s pHOS and PNI recommendations
    - Are the measures too restrictive



# Opposed Comments Summary #1

- 3 of 4 “opposed” – from organizations or collection of organizations
- Individual person’s opposition focused on WDFW inability to run hatcheries or fisheries correctly; specific to a geographic region.
- Complex . . . Predominant themes:
  - Conservation not a priority or it is discounted/not emphasized
    - No commitments to conserve and recover natural-origin populations
    - No clarity as to how the Co-Manager Hatchery policy makes use of existing recovery plans
  - Risks of hatchery production to natural-origin populations are minimized. Emphasis is on benefits only
  - Science is lacking in draft Co-Manager Hatchery Policy
    - No science-based objectives and metrics for M&E programs
    - Articulating risks associated with SRKW-associated production



# Opposed Comments Summary #2

- Predominant themes (con't)
  - Relationship between C-3624 and Co-Manager Hatchery Policy
    - Geographic scope, development of hatchery plans, SEPA
  - Draft policy lacks specifics – no foundational goals or objectives for hatcheries
  - Constraints on use of best available science
    - Use specific literature, manuals, and tools such as models
  - HGMPs are insufficient when hatchery goals should concern recovery
    - No guidance as to what's included in hatchery plans
  - Process hasn't been transparent and has not included the entire Commission
  - WDFW long history of failed commitments
  - Funding requests should not be limited to hatchery operations – to the exclusion of recovery efforts
  - Other comments





# Next Steps

- Share comments with Tribal Co-Managers
- Check-in with Tribal Co-Managers
- Complete SEPA Process
  - Complete SEPA checklist
  - Include concepts generated from our review of the public comments
  - Provide SEPA checklist to full commission for approval
  - Make SEPA determination (significance, non-significance, mitigated non-significance)
  - Public review period for SEPA determination
- Complete “response to comments” document
- Commission vote on draft policy
  - If (Mitigated) Determination of Non-significance: vote to accept, or outright or conditional rejection of policy.
  - If Determination of Significance: vote to initiate EIS or outright rejection of policy



# Updated Proposed Schedule (March 16, 2023)

DATE	MEETING	OUTCOME
January 27, 2023	Fish Committee and Full Commission Webinar	Decision concerning public review and SEPA process. The following assumes FWC decided to approve public review and SEPA process
Feb. 1 – 28, 2023		Official public review - Commission website for distribution of draft policy and to receive public comment.
Feb. 1 – Mar. 15, 2023		<del>WDFW staff conducts SEPA review and makes determination</del>
Mar. 16 – 18, 2023	Fish Committee, Wenatchee, WA	Staff discusses <del>SEPA determination</del> public comments, next steps, and calendar
April 6 – 8, 2023 [?]	Fish Committee and full Commission Meeting Anacortes, WA	<del>Staff discusses SEPA determination. Progress report on review processes.</del> Staff presents completed SEPA checklist and reports on discussions with Tribal Co-Managers. Commission votes on SEPA checklist (move to determination or make changes and resubmit).
<del>May 2023</del> May or June 2023 [?]	Special Meeting & Webinar or Regular Meetings	<del>Report to the Fish Committee and full Commission on the results of the public review and SEPA review processes.</del> Staff presents SEPA determination and public comment period begins
<del>June 22 – 24, 2023</del> August 2023 [?]	Fish Committee and full Commission Meeting Seattle, WA	Staff presents the final draft of the Co-Manager Hatchery Policy to the Fish Committee and full Commission. Commission makes a decision on adoption of the policy.





# Questions and Discussion