



U.S. Fish and Wildlife Service - Pacific Region
Olympic Peninsula Hatchery Review Team

Olympic Peninsula

Big Quilcene, Quinault, and Sooes River Watersheds



Quilcene, Quinault, and Makah National Fish Hatcheries Assessments and Recommendations

Draft Report, Appendix C:

Complete Text of (INITIAL) Comment Letters Received from
Stakeholders

February 2009

Please cite as:

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<http://www.fws.gov/pacific/fisheries/Hatcheryreview/team.html>

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Appendix C: Complete Text of Comment Letters Received from Stakeholders^{1,2}



Point No Point Treaty Council

Port Gamble S' Klallam - Jamestown S' Klallam

February 9, 2009

Michael Schmidt
Facilitator, USFWS Hatchery Review Team
Long Live the Kings
1326 5th Ave. Suite 450
Seattle, WA 98101

Dear Mr. Schmidt:

We appreciate the opportunity to review and comment on the U.S. Fish and Wildlife Service's draft report titled: *Quilcene, Quinalt, and Makah National Fish Hatcheries: Assessments and Recommendations*. We understand that this draft report has been authored by the USFWS Hatchery Review Team.

We are e-mailing you this letter, along with a copy of the draft report containing our suggested edits and comments. Please note that these edits/comments address only the Table of Contents (Appendices), Summary, Introduction, Components of This Report, and Big Quilcene Watershed. You had asked in a phone conversation that we also provide you with a list of comments that would be included, along with other received comments and USFWS' responses, in an appendix to the report. For your convenience, we therefore have inserted in this letter, our major comments, which are also included in the attached draft report. We ask that you consider both our suggested edits/comments in the draft report and the below list of our major comments.

Our major comments are as follows:

- 1) Re: Page 29, first paragraph under Goals but also stated on page viii of Summary in Benefits section: The current net pen program release level is elsewhere noted as being half that of the hatchery (200,000 compared to 400,000 coho smolts). So as stated here, if the survival to adults is the same for the net pen as for the hatchery but production is half that of the hatchery, why is the potential harvest from the net pen program described as only ~19% of the hatchery program? Is this perhaps the result of an assumed different proportion of harvest (primarily terminal) relative to escapement between the hatchery and net pen production? If so, what is the basis for the assumption? There should be an explanation somewhere in this document.
- 2) Re: Page 42, under Ecological Risks but also stated on page viii of Summary in Risks section: The statement is made: "Early emerging coho progeny of naturally spawning Quilcene NFH coho likely have a competitive advantage compared to later emerging natural-origin Hood Canal coho." We recommend you also acknowledge that the

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¹ When the report is finalized, this section will include comments provided by the public during the written comment period.

² The Hoh Tribe provided a response via personal communication. The Tribe's comments were extracted from the personal communication and included, with responses from the Review Team, in Appendix B of the report.

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hatchery coho may be less fit than natural coho owing to potential effects of hatchery domestication and thus the potential impact from competitive advantage owing to early emergence may be reduced or nonexistent.

- 3) Re: pages 45 and 46, under Recommendation QL6d: We recommend you change this recommendation to read as follows:

“If the risk of straying from Port Gamble Bay net pens exceeds NOAA Fisheries and HSRG risk guidelines for hatchery fish, composing greater than 5% of the natural spawners, comanagers should investigate ~~the development of~~ **further, including the alternative of developing** a new integrated broodstock (e.g., derived from Big Beef Creek coho) that ~~would~~ **may** reduce the risk associated with straying”. (*strikethroughs indicate deletions and bold font indicates insertions*).

We make this recommendation because there are other factors to consider besides a new integrated broodstock, including whether such straying is having any genetic effect on the local coho (the 5% guideline is based on concerns about genetic influence). The timing of the Quilcene stock and its reduced fitness owing to domestication may limit any genetic influence. (This possibility is suggested by the USFWS 2007 genetic study.) Reduced fitness may also lower the risk of demographic impacts. Such influences/effects could be assessed by adult straying studies and continuing genetic studies of parr and/or smolts in the local streams. This comment would also apply to straying concerns at the other facilities addressed in the Quilcene watershed section of the report.

- 4) Re: Page 46 under Recommendation QL9b and perhaps also on page 47 under Release and Outmigration: In recommendation QL9b, it is suggested that if harmful algal bloom species are present at levels threatening fish health in Quilcene Bay, then coho that are planned for transfer to the Quilcene net pens may have to be released immediately. Note, however, it is also stated in the immediately preceding recommendation, QL9 that the transfer to the net pens may well need to occur by March 1 to meet water right requirements while not exceeding hatchery loading limits.

The problem here is that a coho smolt release should not occur before April 15 to protect against hatchery coho preying upon ESA listed summer chum. The April 15 release constraint is described in the Tribal and State comanagers’ Summer Chum Salmon Conservation Initiative (SCSCI; WDFW and PNPT Tribes, 2000). Specifically, the SCSCI states that coho smolt releases “...will occur no earlier than April 15 to allow for the clearance of juvenile wild summer chum from freshwater and Hood Canal estuarine areas...” (page 200, first provision under predation risk aversion measures). This provision bears upon planning for coho releases at QNFH, affecting options for release. See also relevant comment specific to QNFH on page 227 of SCSCI.

- 5) Re: Page 48, under Research, Monitoring and Accountability: Potential issues with straying of artificially propagated coho and consequent effects on local natural coho have been raised. A straying study has been suggested in the present document (see recommendation QL7a). The USFWS has recently performed a study of Hood Canal coho genetics (USFWS 2007). Following up on that study, the USFWS had an internal discussion of Quilcene coho genetics on May 21, 2007, producing a summary of that discussion in which the recommendation is made to “[c]ontinue tissue collections and genetics analysis and comparisons of hatchery and wild stocks”.

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Additionally, a study to assess potential demographic effects of Quilcene hatchery coho on natural coho would be helpful. We recommend that within this Research, Monitoring and Accountability section, you make recommendations to address these research and monitoring actions.

- 6) Re: Page 49 under Issue QL17 and reiterated on page 53, first item under Pros of Alternative 4: This appears to be an attempt to raise an issue regarding incidental take of summer chum in the Quilcene Bay terminal fishery. The text notes that the summer chum exploitation rate is 17% in this fishery, which is higher than the pre-terminal and Hood Canal mixed terminal fisheries.
This actually is not an issue with regard to protection and recovery of Quilcene summer chum. The higher exploitation rate (a planned for and expected result of managing to increase coho fishing opportunity) is accommodated by focusing management of the terminal fishery on meeting an escapement goal. Accordingly, management guidelines exist for the fishery and the escapement goal has been met every year. The issue as you have raised it, based on a description of exploitation rates, does not exist. The immediately following recommendation QL17 suggests that perhaps the issue you meant to raise is whether or not changing Quilcene hatchery coho run timing would be an appropriate strategy to consider.
- 7) Re: Page 51 under Alternative 1, Cons: We recommend you delete the first bulleted item that states: “Surplus exceeds current demand for subsistence and ceremonial purposes.” This statement is not true. The facts are: 1) the Tribes will take all the coho that are in good condition as are available, 2) the Tribes interest in the coho diminishes as the coho become dark and deteriorate in condition during the later part of the run, and 3) the tribal demand for coho in good condition remains strong regardless of the size of the surplus.
- 8) Re: Page 54, Recommended Alternatives: There is an alternative, not included in the prior listing of alternatives, that we think is laudable and is apparent from the specific recommendations made in this document regarding coho production; i.e., recommendations QL9 through QL10c. Two points in particular were made in these recommendations: 1) “Reassess the water management practices to determine how many coho Quilcene NFH can produce without exceeding the Service’s recommended upper rearing thresholds and Quilcene NFH’s water right restriction” (from recommendation QL9); and 2) “Work with comanagers to develop the best production and release strategy from the Quilcene NFH and Quilcene Bay Net Pen” (from recommendation QL10) Thus this document appropriately suggests that there is still work to be done to resolve the question of limits on rearing under the water right and to come to a co-manager agreement on the best production and release strategy. We accordingly recommend that the preferred alternative include provision for these tasks to be implemented and completed in 2009.
- 9) Re: Appendices, in Table of Contents and Page 259: We deduce that in the interest of saving space and funding that, as indicated on the appendix page to this draft, you plan to make the appendices available on a web site. However we strongly believe that the comanagers’ comments and associated review team responses should be part of the larger document, whether it is in digital or paper form. This would help ensure that the reader has equal access to the USFWS review and comanagers’ comments. We therefore

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recommend that you include at least Appendix B in the larger document when it is distributed.

- 10) Re: Sources of information at various locations within the document: There are numerous places within the document where specific information is provided, often numbers or percentages reflecting on stock status or harvest information. Unfortunately, no sources are provided for much of this information. We have noted within the sections we have reviewed in the attached copy of the draft report, where sources of information are missing.

Though we take issue with some parts of the Hatchery Review Team's review document as described above, we feel the document overall is very well done and appreciate the tremendous amount of effort invested in its preparation. For that we thank you.

For any questions you may have, we ask that you contact Chris Weller, who can be reached by phone at 360-297-6532 or by e-mail at cweller@pnptc.org. Thanks again to the Hatchery Review Team for its fine effort.

Sincerely,



Randy Harder
Executive Director
Point No Point Treaty Council

Enclosures

USFWS Olympic Peninsula Hatchery Review Team
Olympic Peninsula NFHs Assessments and Recommendations Report – February 2009



PORT GAMBLE S'KLALLAM TRIBE
NATURAL RESOURCES DEPARTMENT
31912 Little Boston Rd. NE – Kingston, WA 98346

February 10, 2009

Michael Schmidt
Facilitator, USFWS Hatchery Review Team
Long Live the Kings
1326 5th Ave. Suite 450
Seattle, WA 98101

Dear Mr. Schmidt:

Thanks for being flexible with an additional day to provide our comments in regards to the U.S. Fish and Wildlife Service Hatchery Review Team's draft report titled: "Quilcene, Quinault, and Makah National Fish Hatcheries: Assessments and Recommendations". We have also included the draft report by way of attachment with comments and edits as well. We have reviewed and discussed the draft with the Point No Point Treaty Council Staff and fully support and concur with their suggestions, comments and recommended edits. In an attempt to avoid duplication, these comments should be considered in addition to the PNPTC's submitted to you yesterday.

Our major comments are included below in addition to various edits and comments in the attached draft report. Please note that our comments on the attached draft are noted on PNPTC's submitted version of the draft so our comments can be shown along with theirs. We ask that you consider both.

Our major comments are as follows:

Summary and pages 45 and 46, under Recommendation QL7d: We recommend you change this recommendation to read as follows:

"If the risk of straying from Port Gamble Bay net pens exceeds NOAA Fisheries and HSRG risk guidelines for hatchery fish, composing greater than 5% of the natural spawners, comanagers should conduct an impact assessment based on calculated and observed numbers of successfully spawning strays, numbers (range) of expected fry and parr and anticipated and observed fry emergence timing differences. The assessment should also include estimations of potential competitive impacts based on the numbers and likely ratios of the potential straying progeny to other "natural" non straying stocks. If significant competitive impacts are determined to be likely, with a reasonable level of confidence, development of mitigating actions will be reviewed for consideration including the potential alternative of developing a new integrated broodstock (e.g., derived from Big Beef Creek coho) that might reduce the perceived risk associated with straying". Please also consider PNPTC comments on this recommendation.

Pages IX & 46 under Recommendation QL9b and page 47 under Release and Outmigration:

As PNPTC comments pointed out, a coho smolt release should not occur before April 15 to protect against hatchery coho preying upon ESA listed summer chum. As noted in our comments in the attached draft report on page IX of the summary which associate with page 46 in QL9b, the suggested actions seem rather drastic without providing time for exploring and experimenting with other options such as lower densities (place an additional net pen or two and minimize SW rearing

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densities which should help minimize impacts from HAB), earlier ponding and early release (after April 15th) if a HAB is actually threatening mortality episodes; ponding into a floating vertical raceway (Hypolon skirt on SW net pen w/FW flow providing one to two meter FW lens using conditioned reuse of the water effluent from on site coho rearing etc.

PG Net Pen Genetic Risks and Straying, VII, Pages 31 & 48: Potential issues with straying of artificially propagated coho and consequent effects on local natural coho have been raised. It seems important to clarify just how much overlap exists (if any) based on “exhibits a run timing of one to four months earlier than other hatchery and natural stocks of Hood Canal coho” mentioned elsewhere in the document. Specifically what range of counted strays on the spawning grounds that overlap “natural origin” spawners actually occurs. If this program in the HRT’s perspective “may pose genetic risk” then the burden should be on the HRT to clarify this risk at least within some reasonable scale of a minimum to maximum likelihood. We request that the range of data sets used in the discussion of straying and genetic issues and impacts (how many years, numbers sampled, actual data used, process etc. and the specific source reports or studies be provided.

We appreciate this opportunity to provide comments on this document. If you should have any questions, please do not hesitate to give me a call at 297-6237 or by email at paulm@pgst.nsn.us.

Sincerely,



Paul McCollum
Director, Natural Resources Department

Attachments

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The mission of the U.S. Fish and Wildlife Service is working with others to conserve, protect and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people.

February 2009



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