



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

**Olympic Peninsula**

***Big Quilcene, Quinault, Hoh, Sooes, and Waatch River Watersheds***



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

**Final Report, Appendix C:  
Complete Text of Comment Letters Received from  
Comanagers and Stakeholders**

**May 2009**

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

## Appendix C: Complete Text of Comment Letters Received from Comanagers and Stakeholders<sup>1</sup>



### 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, Quinault, 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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<sup>1</sup> 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](mailto: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 – May 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 ratio's 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 15<sup>th</sup>) 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](mailto:paulm@pgst.nsn.us).

Sincerely,



Paul McCollum  
Director, Natural Resources Department

Attachments



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



**Skokomish Indian Tribe**

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Skokomish Nation, WA 9

April 14, 2009

Douglas DeHart, Ph.D.  
Hatcheries Team Leader  
Fishery Resources  
United States Fish and Wildlife Service, Region 1  
911 Northeast 11<sup>th</sup> Avenue  
Portland, Oregon 97232-4181

Re: Olympic Peninsula NFH Assessments and Recommendations Report

Mr. DeHart:

Thank you for meeting with the Skokomish Tribe on March 24, 2009, regarding the assessments and recommendations concerning the salmon and steelhead production at the Quilcene National Fish Hatchery (QNFH). As a follow up to that meeting, we are submitting this letter which outlines the concerns we discussed at the meeting.

1. The Skokomish Tribe, specifically David Herrera, spent much time with the Hatchery Scientific Review Team (HSRG). From that process, the Tribe gained a respect for the scientific process. It is important to keep in mind, though, that the needs and desires of the Tribe are not based solely on science. The deep rooted and long standing traditions and culture of the Tribe must also be included in any decision which could have an impact on the Tribe.
2. Proposed loading densities at the QNFH appear to be more conservative than those used by either the tribes or the state at their respective hatchery facilities. While we understand the importance of proper density loading, we want to ensure that the densities used at the QNFH are appropriate and not unnecessarily conservative and are appropriately derived based upon available water and experience. The Tribe does recognize the effects of the harmful algal blooms (HAB) on the coho placed in the Quilcene Bay net pen. As raising all of the coho at the hatchery facility could be necessary in future years we understand your recommendation to reduce production from 600,000 to 400,000 coho.
3. Large surpluses of coho into the hatchery are a concern to the QNFH. However, those fish have become important to the Skokomish Tribe, especially elders who can no longer fish, as a source of nourishment. Furthermore, the Skokomish Tribe feels the surplus is at least partially caused by the conflict

Reply to Olympia Peninsula NFH Assessments and Recommendations

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## USFWS Olympic Peninsula Hatchery Review Team

### *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

between the coho and the summer chum. Because the timing of the indigenous coho stock used at the QNFH has been moved up in time, the Tribe is unable to fully fish for coho because of the protections in place for the summer chum. The Tribe recommends that the QNFH attempt to manipulate the coho run so it once again matches its normal, later, run timing. This would allow for a larger coho fishery thus reducing the amount of surplus fish returning to the hatchery.

We do recognize that the genetic potential may not exist to move back the run timing of the fish at the QNFH. If this is the case, the Tribe suggests bringing in a different stock of coho utilizing donor strains from the small streams and rivers near to the QNFH. The Big Beef coho stock is not an appropriate choice because of the increased risk of straying.

In closing we would once again like to thank you for your time to discuss the assessments and recommendations regarding the salmon and steelhead production at the Quileenc National Fish Hatchery. While the Tribe is not necessarily against the proposed changes to production, they certainly would be received much better if the changes went hand in hand with a change to the run timing of the coho. The Skokomish Tribe appreciates your consideration of our concerns and the need to incorporate the cultural needs of the Tribe along with the scientific process used to arrive at your conclusions.

Sincerely,



Joseph Pavel  
Chair, Skokomish Tribe  
Director, Skokomish Natural Resources

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

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE  
Fish Program - Region 6 - Hood Canal District  
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March 24, 2009

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

Michael:

Thank you for the opportunity to provide comments on the USFWS Olympic Peninsula Hatchery Review Team draft report titled "Quilcene, Quinault, and Makah National Fish Hatcheries: Assessments and Recommendations", dated February 2009. Comments are provided on the Quilcene National Fish Hatchery chapter of the report. A copy of the draft report containing suggested edits and comments will also be emailed to you. The major comments are as follows:

Quilcene National Fish Hatchery

1. We concur with the comments provided by the PNPTC and Port Gamble S'Klallam Tribe on the previous review draft. Any tribal comments that were not incorporated into the February 2009 draft should be re-considered.
2. Current Status of Stocks text and tables: The list of stocks should include all summer chum salmon stocks in Hood Canal since they are all "of concern to the co-managers". For example, why are summer chum stocks in Lilliwaup, Hamma Hamma, Union, Tahuya, and Dewatto missing from the list? These could be included with Dosewallips and Duckabush summer chum and covered in Table 5 or covered in a separate table(s) since all except Dewatto have supplementation programs which are either discontinued (Union) or ongoing.
3. Table 6. Big Beef Creek summer chum: The supplementation program was terminated in 2005 (BY 2004). The terminated program was *integrated*.
4. Tables 8, 9, and 10. Winter Steelhead: Biological Significance is rated *Medium*, but could be *High* since DNA analysis (D. Van Doornik 2008) indicates significant genetic diversity within Hood Canal steelhead, significant differences between steelhead in each stream (stock) analyzed, and no/little evidence of introgression from hatchery steelhead stocks used in Hood Canal.

## USFWS Olympic Peninsula Hatchery Review Team

### *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

Table 8: Why is Big Quilcene steelhead rated *Low* Biological Significance compared to the other stocks? It's not really that different. Plus, it could be included together with the steelhead stocks in Table 10 (HCSH Project Control Streams).

What are the estimated capacities for steelhead adults presented in Table 9 and Table 10 based on? Provide citations.

Table 9: Primary Purpose of the hatchery program is Research and Conservation; e.g., the co-managers view the program as research and as an intensive monitoring and evaluation component of a conservation program. And, the Secondary Purposes would then be "Application of information to other steelhead conservation/recovery efforts"; i.e., this information could be applied outside of Hood Canal.

#### 5. Quilcene NFH Coho

- a) Demographic Risks, p. 42: add another sentence to note that "Incidental catch of summer chum is exacerbated by the early hatchery coho return timing which was induced by hatchery practices".

This could be identified as a new Issue and discussed/addressed under Broodstock Choice and Collection on p. 44. For example, selection of broodstock for a more normal entry/spawn timing could be considered and implemented to minimize potential incidental harvest impacts to summer chum during the fishery for QNFH and QBNP coho.

- b) Issue QL9, p. 46: This is the key issue. Reassessing water management practices will help better determine feasible alternatives. This assessment should occur in discussions with USFW Service and the co-managers.
- c) Issue QL-17, p. 49: This has not been an issue in recent years. Since the co-managers initiated regular in-season discussions, incidental harvest of summer chum has been limited and generally been meeting management guidelines. The recommendation is basically not very feasible.
- d) New Alternative to consider: Maintain the Quilcene NFH program at 600K coho, but rear and transfer 200K coho (at 25 fpp in February) to the Port Gamble Net Pens, 200K to Quilcene Bay Net Pens, and release 200K from Quilcene NFH. The 200K for PGNP would replace 200K coho currently transferred to PGNP from George Adams Hatchery. Intent would be to address and reduce the apparent straying of PGNP coho into northern Hood Canal streams (i.e., is straying, in part, due to the transfer of eyed eggs from QNFH to George Adams for rearing (to 25 fpp) and then to PGNP for grow out and release?). In addition, a reduction in the coho program at George Adams Hatchery could provide other options to support conservation programs (e.g., S.F. Skokomish steelhead) or other production programs.

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

6. Quilcene NFH Hood Canal Steelhead: Quilcene should continue to play an important role in the Hood Canal Steelhead Project. The implementation of the Recommended Alternatives would further enhance the contribution by Quilcene NFH.

Please let me know if you have questions, comments or need more information.

Sincerely,

Thom H. Johnson  
WDFW District Fish Biologist  
Hood Canal District

# USFWS Olympic Peninsula Hatchery Review Team

*Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*



STATE OF WASHINGTON

## DEPARTMENT OF FISH AND WILDLIFE

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March 18, 2009

Michael Schmidt  
Director of Fish Programs  
Long Live the Kings

Dear Michael:

The Washington Department of Fish and Wildlife (WDFW) would like to comment on the US Fish and Wildlife Service (USFWS) Hatchery Review Team's recommendations for the Hoh River Steelhead program at the Quinault National Fish Hatchery at Cook Creek.

The WDFW agrees with recommendations (b) through (e), but not with (a) at this time. We recommend the continuation of the current direct plant of 50,000 winter steelhead smolts at Allen's Bar in the Hoh River. There is an ongoing collaborative genetic study between the Olympic National Park, Hoh Tribe and the WDFW to determine the impact of hatchery origin steelhead and salmon on wild fish in the Hoh River. We feel we should wait to receive the results of this study (due in 2010 or 2011) to determine if changes are needed to the current program.

We do recognize the disease risk associated with this program and support the direct plant only if the smolts are determined to be disease free. As an alternative to the direct plant from Cook Creek, we recommend considering transferring the program and all monies required to fund rearing and transportation costs associated with the Hoh Steelhead to the WDFW Bogachiel Hatchery facility. The Bogachiel facility has pathogen free spring water.

Thank you Michael for the opportunity to comment.

Sincerely,

Bill Freymond  
Region 6 Fish Manager  
WDFW

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



**Quinault Indian Nation**

POST OFFICE BOX 189 • TAHOLAH, WASHINGTON 98587 • TELEPHONE (360) 276-8211

April 3, 2009

USFWS Hatchery Review Team members:

The Quinault Indian Nation ("Nation") would like to thank the US Fish and Wildlife Service ("Service") Hatchery Review Team ("Team") for their time and dedication to evaluating the hatchery programs at Quinault National Fish Hatchery (QNFH). The Team's report should be a useful tool for identifying program changes that will better meet the Nation's needs and fishery goals in the future. The report is a positive step towards improving program effectiveness, efficiency, scientific defensibility and reduction of risks to natural salmonid populations. Lastly, this report will help identify program-specific issues that require additional consultation between the Nation and the Service.

We have reviewed the Team's assessment of current QNFH programs and the program specific recommendations. At this time, we have not completed a full assessment of the report, nor have we developed a comprehensive response that includes the Nation's preferred program alternatives. The timeline identified by the Service to finalize the plan is somewhat incompatible with QIN resource management obligations during this busy time of year. We are also continuing our own review of our tribal hatchery programs on the Quinault Indian reservation with the goal of developing a unified enhancement plan which integrates program objectives between all three hatchery facilities located on the reservation.

At this time, we have identified several HRT recommendations that are consistent with our viewpoint on the listed issues. For instance, the Nation supports recommendations for increased monitoring and evaluation of managed salmonid populations within the Quinault watershed. Conversely, we disagree with several recommendations within the report. We have also identified several inconsistencies and errors within the report and have outlined a few of these in the comments below. The following comments do not represent a full review of this document by the Nation.

We provide the following specific comments:

Page 11V. Rewrite language under footnote 2 to read "...Co-managers in the Quinault River watershed (Quinault NFH) are the Quinault Indian Nation, Washington Department of Fish and Wildlife, National Marine Fisheries Service (NOAA Fisheries), and the U.S. Fish and Wildlife Service." The Makah Nation was referenced instead of QIN in the draft report.



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#### **Quinault Indian Nation comments on the USFWS Hatchery Review Team Report, Section IV. Quinault River Watershed (North Coast)**

##### **Quinault NFH Steelhead, On-station Release**

**Recommended alternative for steelhead program.** QIN generally supports the continuation of the current segregated steelhead program at this time; however, further consultation is needed for several of the recommendations associated with the Team's preferred alternative.

Page 71. Figure 5. This figure should include the Salmon River Fish Culture Facility (SRFCF) located in the Queets watershed as an associated facility. As stated on page 88, "The Quinault NFH was authorized on July 7, 1964 by Appropriation Act (78 Stat.283) and Fish and Wildlife Act of 1956 (70 Stat. 1119) and began operations in 1968 "to restore and enhance depleted runs of salmon and steelhead on the Quinault Indian Reservation and adjacent federal lands"; therefore, the Queets watershed and associated facilities should be indicated on the map.

Page 73. Under section "Fisheries". We recommend rewriting the first paragraph to read "The Quinault Indian Nation regulates tribal commercial and tribal sport fisheries in the Quinault river system." Assuming the purpose of this section is to memorialize QIN fishing activities within the Quinault watershed in a broad sense, it should be recognized that the Quinault system once supported fisheries in every month of the year; however, the current status of some populations, in particular Quinault sockeye, limits fishing opportunity during the spring/summer months. The Quinault Indian Nation regulates sport fishing on Lake Quinault, which is located within the reservation boundary.

We recommend deleting the sentence, "The season is fairly liberal but harvest regulations are fairly restrictive". This statement is rather vague and does not provide any meaningful description of fishing opportunity on Lake Quinault.

Page 74. Current Status of Salmonid Stocks. Quinault River hatchery winter steelhead should be indicated as integrated rather than segregated.

Page 92. The McMillan and Gayeski, 2006 document is not a peer reviewed report. The data and methods for estimating historic steelhead abundance should be reviewed by the HRT and shared with the Quinault fisheries staff prior to using these estimates in your report.

Quinault does not endorse the use of WDFW SASSI reports for assessing population viability.

The SASSI designations primarily use escapement trends for determining the health of a population. This represents an incomplete analysis of population viability.

There are inconsistencies in the Habitat status summary. For example, the habitat designation for Quinault River Winter steelhead cites the Bureau of Reclamation 2005 report indicating that the upper Quinault River floodplain will continue to deteriorate without intervention. This included areas within Olympic National Park. Habitat designation for Quinault River Fall Chinook excludes areas within ONP when referring to unstable habitat.

Ninth bullet point. Steelhead releases occur downstream of Lake Quinault. No steelhead are intentionally released into Lake Quinault.

Page 99 Harvest benefits. The distribution of recoveries reported under bullet 1 exceeds the estimate of the 93-02 average total number of steelhead recovered annually.

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

Lake Quinault is within the Quinault reservation boundary and should be noted as an area under QIN jurisdiction.

Page 104. QN3 Quinault does not agree that mass marking QNFH steelhead is necessary. As stated in Issue QN3a, no selective fisheries occur in the Quinault area serviced by QNFH, so little purpose exists for implementing this recommendation. We agree that incorporating very few wild steelhead into the hatchery broodstock poses a low risk to the natural population.

Page 105. QN4a. Quinault requests that USFWS consult with the Nation regarding upgrades to the weir and water supply. Improving the weir design should be considered a priority project at QNFH.

Page 107. QN10. No significant fish health concerns have been identified under current density and flow criteria at QNFH. Quinault does not agree that program reductions are warranted based on the desire to reduce current fish density and/or flow indices. We request further consultation on this issue if the recommended indices would result in program reductions consistent with this recommendation.

Page 108 QN 112. Quinault recommends that USFW prioritize the replacement of the electric weir with a velocity barrier weir located at the same site. We request that USFW consult with the Nation on their intentions for replacing the electric weir. In particular, we would like to know how this project is currently prioritized among other USFWS hatchery projects and what actions the USFWS plans to take to secure funding for this project.

Page 109. QN23. Quinault supports recommendations to improve monitoring of juvenile salmonids in the Quinault watershed.

Page 109. QN25. Quinault would like to work with the Service to improve hatchery data transfer. Post season reporting of rack returns, sampling rates and cwt recoveries to the Quinault fisheries department could be improved.

Page 111. QN29. Quinault supports recommendations to conduct sampling and monitoring activities to obtain recreational catch estimates.

#### **Quinault NFH Steelhead, Hoh R. Release**

The Nation supports the continuation of the Hoh River steelhead program, which provides significant harvest opportunity to the Hoh Tribe and non-treaty recreational anglers fishing in the Hoh River. We also support the continuation of the rigorous fish health sampling and transfer protocols that have been implemented over the years to minimize the risks to natural salmonid populations in the Hoh River.

#### **Quinault NFH Coho**

**Recommended alternative for coho program.** The Nation generally supports the continuation of the current segregated coho program at this time; however, further consultation is needed for several of the recommendations associated with the Team's preferred alternative.

## USFWS Olympic Peninsula Hatchery Review Team

### *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

#### **Quinault NFH Fall Chinook**

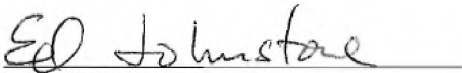
**Recommended alternative for Fall Chinook program.** The Nation requests consultation with the Service on the Team's preferred alternative to discontinue the Fall Chinook program at QNFH and transfer the production to Lake Quinault.

#### **Quinault NFH Chum**

**Recommended alternative for Chum program.** The Nation generally supports the continuation of the current chum program at this time; however, further consultation is needed for several of the recommendations associated with the Team's preferred alternative.

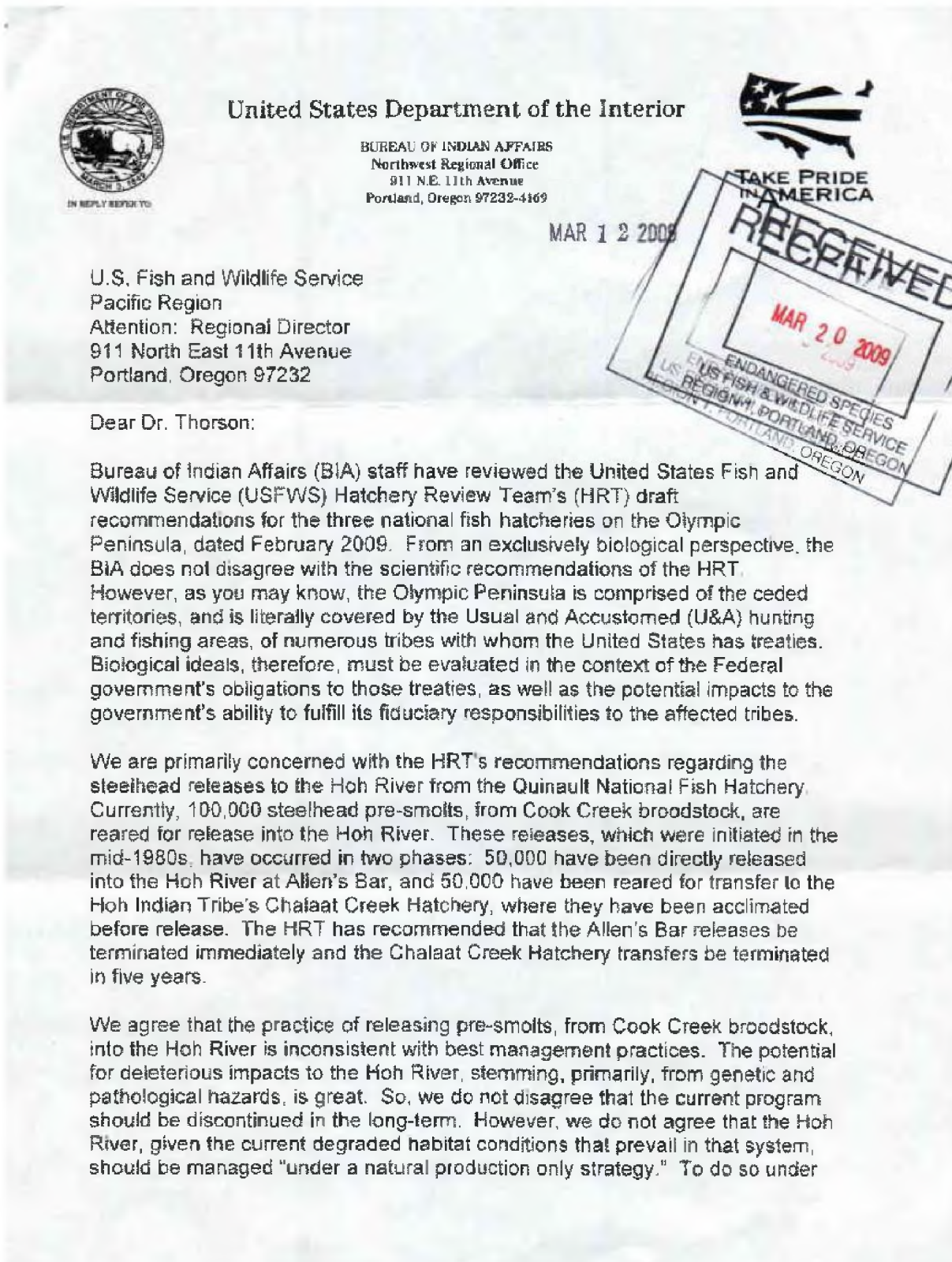
Again, we commend the Team for their review and documentation of the current programs at QNFH and look forward to further consultation with the Service regarding this report and other future steps toward hatchery reform and program modifications aimed at meeting the objectives of the Nation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ed Johnstone", is written over a horizontal line.

Ed Johnstone  
Quinault Fisheries Policy Spokesperson

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



## USFWS Olympic Peninsula Hatchery Review Team

*Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

current conditions would, in our opinion, be a failure on the part of the Federal government to honor its treaty obligations and fulfill its trust responsibilities.

It could hardly be argued that the Hoh Tribe is responsible for the habitat degradation that has occurred on the Hoh River. So extensive is that degradation that even if escapement were substantially increased, the system's overall productivity would likely not be improved. There simply isn't enough quality spawning, or rearing, habitat. In that light, how can the Hoh Tribe be expected to meet its economic, subsistence, and cultural needs on natural production alone? The Hoh Tribe did not create the current conditions, but they will surely suffer the consequences if all supplementation is terminated.

While we agree that the current program is not the best solution to upholding the United States' obligations to the Hoh Tribe's treaty fishing rights, we believe something must be done to replace, or even improve on, those releases. Even current releases fall short of meeting the Hoh Tribe's legitimate needs. In our opinion, and we hope you agree, it would not be appropriate to terminate the current program without replacing it with some other supplementation program. As you might imagine, the consequences to the Hoh Tribe, a tribe that depends almost exclusively on fishing for its economic well-being, and for whom fishing and cultural identity are inextricably linked, would be immeasurable.

BIA staff have discussed this matter with members of the HRT and have found them to be understanding, helpful and professional. They have conceded that they understand that there are treaty implications to their recommendations, but have held steadfast to their charge to conduct the review from a purely scientific perspective. Certainly, we understand that the technical aspect of this review must necessarily focus on purely scientific considerations. The concerns I have raised must, I think, be initially addressed at the policy level, although such discussions may subsequently give rise to the need for further technical discussions. I am confident that, together, we can find a solution that addresses the seemingly conflicting goals of habitat restoration (including increased productivity of native stocks) and preservation of treaty fishing rights.

Ultimately, we believe the Federal agencies involved here, most particularly the USFWS, the National Park Service (Olympic National Park), and BIA, should work together, in a collaborative way, to fulfill the Federal government's trust responsibility. Of course, the Hoh Tribe, as well as its co-manager, the Washington Department of Fish and Wildlife, must also be involved in the efforts to identify an appropriate solution. There may be others, as well. The charge for such a collaborative effort, as I envision it, would be to explore alternatives that would, in the long term, contribute to the restoration of the Hoh River, with appropriate concern for maintaining the genetic integrity of wild stocks, while simultaneously meeting the economic, subsistence and cultural needs of the Hoh Indian Tribe.

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

I would be pleased to discuss this matter with you at your convenience.

Sincerely,

/s/STANLEY M. SPEAKS

Northwest Regional Director

cc: The Honorable Daki Leo Fisher, Chairperson, Hoh Indian Tribe  
Ms. Karen Gustin, Superintendent, Olympic National Park  
Doug DeHart, Hatchery Review Team, U.S. Fish and Wildlife Service

# USFWS Olympic Peninsula Hatchery Review Team

## *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*



### **United States Department of the Interior NATIONAL PARK SERVICE**

Olympic National Park  
600 East Park Avenue

Port Angeles, Washington 98362-6798

IN REPLY REFER TO:

N1619 (OLYM-NRM)

March 17, 2009

Doug DeHart  
U.S. Fish and Wildlife Service  
Pacific Region Fishery Resources  
911 NE 11<sup>th</sup> Avenue  
Portland, Oregon 97232

Dear Mr. DeHart:

Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service Olympic Peninsula Hatchery Review Teams' draft report entitled, "Quilcene, Quinalt, and Makah National Fish Hatcheries: Assessments and Recommendations" dated February, 2009. Olympic National Park (ONP) staff reviewed the report and attended the February 19, 2009 meeting in Port Angeles. In general, we found that the draft report contains a very useful summary of hatchery operations, risks, benefits, and recommendations by the review team. We do have several general comments regarding the role of ONP in fisheries management on the Olympic Peninsula. We also offer comments specifically related to the hatchery program at Quinalt National Fish Hatchery.

ONP recognizes and respects tribal treaty rights, our trust responsibilities to the tribes, and our cooperative management with the State of Washington. We also recognize the economic importance of hatchery fish to tribal and non-tribal fisheries outside the park. We appreciate that the draft report and public meeting highlight the importance of recognizing conservation goals for each watershed, and the report states that "long-term conservation needs of natural salmonid populations require a reexamination of the role of hatcheries in the context of basin-wide management and conservation strategies". However, we were disappointed to note that the draft report fails to consider the management and conservation objectives of the National Park Service (NPS).

We believe that one of the major shortcomings of this report is the lack of recognition of ONP as a cooperative fisheries and land manager in the Quinalt River, Hoh River and Lake Ozette basins. Over 25% of the Olympic Peninsula's land area, and major portions of the East Fork Quinalt (100%), North Fork Quinalt (100%), Hoh (60%), and Lake Ozette basin (22%), are located within ONP. The NPS holds exclusive federal jurisdiction over management of the natural resources within the park's boundary, and has significant interest and responsibility in protecting wild salmonids in these waters, where hatchery fish may interact with wild populations.



USFWS Olympic Peninsula Hatchery Review Team  
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We believe that, when evaluating the role of hatcheries in a basin-wide conservation strategy, the report must consider ONP management policies and responsibilities. These policies are designed to protect and perpetuate native aquatic species and natural habitats, preserve or restore natural behavior, genetic variability, and ecological integrity of native fish populations, and provide quality and diverse recreational fishing opportunities only when ecosystem impacts are minimal. The report should also acknowledge that ONP has exclusive jurisdiction of recreational fisheries in significant portions of the Quinault, Hoh, and Ozette Basins, and that those regulations generally promote selective harvest of hatchery fish and catch-and-release of wild steelhead and salmon.

ONP supports improved protection of wild steelhead in Quinault and Hoh Rivers for the benefit of fisheries and ecosystem processes. The increased protection of wild steelhead can be accomplished by minimizing and eliminating genetic, competition, and disease risks to wild steelhead stocks in those river systems. We support and encourage mass marking of all hatchery winter steelhead at Quinault National Fish Hatchery. Such marking is a primary management tool to distinguish between hatchery and wild fish, and 100% of those hatchery raised fish should be marked. We recommend reevaluating the discontinued marking of winter steelhead in Quinault National Fish hatchery as marking allows for selective, non-tribal fisheries in both State and Olympic National Park waters. Any costs associated with marking and fin clipping should be included as part of the hatchery operations.

ONP supports the Review Team's recommendations to immediately discontinue the annual releases of 50,000 Quinault origin winter steelhead at Allen's Bar (river mile 15) in the Hoh River. The elimination of hatchery steelhead releases at that location will reduce the effects of many ecological and genetic risk factors. The elimination of these transfers will reduce identified risks of pathogen transmission (e.g. IHN) from Quinault National Fish Hatchery to the Hoh River. Additionally, the elimination of these releases may reduce the number of adult, hatchery strays that enter into ONP. Hatchery strays are annually observed in upper portions of the Hoh River in the park during winter and spring, many in gravid condition, and pose hybridization and competition threats to wild steelhead that spawn in that area. The discontinuation of releases at Allen's Bar also will reduce the duration of time that hatchery juveniles remain in freshwater, and therefore minimize the ecological risk of interaction with wild juvenile steelhead.

We commend the Review Team's recommendation to implement natural production in the Hoh River over the long-term (15 to 50 years), and applaud their recognition of this unique opportunity. The Hoh River is one of the last free-flowing rivers on the West Coast without a salmon or steelhead hatchery. It also is one of the last remaining rivers in Washington State with significant numbers of wild steelhead. The upper portions of the spawning and rearing areas are entirely protected within ONP.

The implementation of natural production and the discontinuation of annual releases of hatchery steelhead into the Hoh are generally in accordance with meeting the NPS Fisheries Management Policies. However, we do recognize the inherent challenges of this strategy with respect to tribal and sport fisheries, and therefore support the development of a long-term management plan for Hoh River winter steelhead among cooperative managers that include the Hoh Indian Tribe,

## USFWS Olympic Peninsula Hatchery Review Team

### *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

Washington Department of Fish and Wildlife, Bureau of Indian Affairs, NPS, and U.S. Fish and Wildlife Service.

The cooperative managers should develop short and long-term strategies for managing wild steelhead in the Hoh River. Some of the critical topics of discussion include the number of hatchery steelhead released (e.g. 0 to 100,000) in the Hoh River, the location/s of these releases, stock origin, an integrated vs. segregated program, location of incubation, rearing, and acclimation facilities, and means to relocate releases of hatchery steelhead away from important areas of natural production in the middle and upper river. The cooperative managers could then address the risks and benefits of each option, and develop long term fisheries management and harvest plans with respect to wild steelhead.

We believe that the report would benefit from a stand-alone section that prioritizes research and monitoring needs, and recognizes that hatchery programs should be thoroughly monitored to detect and manage risks to wild salmonids. The following are high priorities: 1) establish genetic baselines for all hatchery and wild stocks in Quinault Basin; 2) conduct fish pathology surveys for wild and hatchery winter steelhead in Hoh and Quinault Rivers; 3) assess the extent of straying in Quinault National Fish Hatchery winter steelhead and coho salmon; and 4) plan to use existing genetic baseline studies being conducted by ONP, Washington Department of Fish and Wildlife, and the Hoh Tribe to guide future hatchery release strategies in the Hoh River.

The following are page and line specific comments:

#### **PAGE AND LINE SPECIFIC COMMENTS:**

Summary, page vii, paragraph 4. The National Park Service should be added as a cooperative manager of fisheries.

#### **Quinault National Fish Hatchery:**

Page 75: The following statement is incorrect. “The Washington Department of Fish and Wildlife regulates sport fishing in Lake Quinault outside of the reservation boundary and the Quinault River above the Lake. The season is fairly liberal but harvest regulations are fairly restrictive.” The report needs to insert that, “Olympic National Park regulates sport fishing regulations in the upper Quinault River including the entire East and North Forks.”

Page 105; Issue QN2: The following statement should include the “upper” Quinault River in Olympic National Park. The draft report states that, “*The distribution and potential stray rate of Quinault NFH steelhead returning to the Quinault River is unknown, thus leading to much uncertainty regarding genetic risks to the natural steelhead population in the lower Quinault River*”. The issue of straying is not limited to lower river. We have the same comment for Page 141.

Page 106. We strongly encourage mass marking of all winter steelhead at the Quinault National Fish Hatchery to enable selective non-tribal fisheries in Olympic National Park. The following statement fails to recognize the existence of selective non-tribal fisheries that occur in Olympic National Park: “*Issue QN3a: In response to a Congressional mandate, mass marking by adipose fin clip did occur in brood years 2005-2006, but was discontinued due to reduced funding and a*

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

*determination that there was no intent to implement a selective fishery which is often an intended benefit to mass marking.” Currently, a selective fishery exists in Olympic National Park with retention of hatchery fish and release of wild fish.*

Page 121. Please insert a statement about NPS fishing regulations. *“The WDFW fishing regulations for Olympic Peninsula rivers allow the public to retain one wild steelhead per angler per year, whereas adipose fin clipped hatchery steelhead retention is 2 fish allowed per day per angler.”* Please insert, “ONP fishing regulations in park rivers allow the public to retain two hatchery steelhead per day and require catch-and-release of wild steelhead.”

Thank you for your consideration of these comments. We recognize that decisions today influence future management and conservation of Pacific salmonid stocks in Olympic Peninsula rivers, and appreciate the effort that USFWS has undertaken to identify risks and recommendations for current hatchery programs. If you have questions, please contact Sam Brenkman (360-565-3081) or Pat Crain (360-565-3075).


Sincerely,



Karen Gustin  
Superintendent

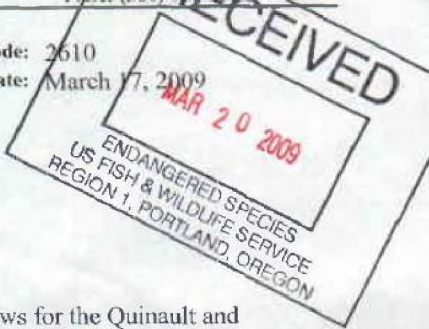
# USFWS Olympic Peninsula Hatchery Review Team

## Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009

	<b>United States Department of Agriculture</b>	<b>Forest Service</b>	<b>Olympic National Forest</b>	1835 Black Lake Blvd SW Suite A Olympia, WA 98512 (360) 956-2300 FAX: (360) 956-2330
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File Code: 2610  
Date: March 17, 2009



USDI Fish and Wildlife Service  
911 NE 11th Avenue  
Portland, OR 97323-4181

Dear Mr. DeHart,


Thank you for the opportunity to comment on the hatchery reviews for the Quinault and Quilcene National Fish Hatcheries. We appreciate the Fish and Wildlife Service's efforts to manage hatcheries to meet the long-term goal of maintaining or improving naturally spawning populations of salmon and steelhead. Unfortunately, some of the recommendations in the draft report conflict with the stated goals of the hatchery reform project.

Our primary concern is the need to modify the existing facilities to provide adequate adult fish passage for native salmonids to spawning habitat above the two facilities. The existing hatchery weirs entirely block fish access to over 15 miles of anadromous habitat in the Cook Creek watershed and reduce access to over 3 miles of anadromous habitat in the Big Quilcene River. Potential production of wild salmon and steelhead in these reaches is forgone every year. Much of the currently inaccessible habitat upstream of the two hatcheries lies on the Olympic National Forest.

We strongly support the Review Team's recommendation to modify the weir and ladder configuration at the Quilcene hatchery to improve upstream passage for steelhead at that facility.


We are disappointed that the Review Team did not address the ecological risks of excluding fish passage for native fish above the Quinault National Fish Hatchery in a meaningful way. Intentionally creating a fish passage barrier and excluding wild salmon and steelhead production in over 15 miles of low gradient, high quality mainstem and tributary habitat clearly conflicts with the stated goal of ensuring that the hatcheries contribute to the conservation of naturally-spawning populations of salmon, steelhead, and other aquatic species. This is a significant issue that warrants a serious discussion and consideration of alternatives to correct the current situation. Alternatives could include seeking out additional water sources, disinfecting water drawn from Cook Creek, or discontinuing the out-of-basin fish transfers that are the primary concern for disease control. Simply out-planting juvenile hatchery fish into the unutilized habitat upstream is not a viable long-term strategy because it does not provide for natural selection, genetic diversity, or natural stream processes.

Instead of considering alternatives to remove the fish passage barrier, the Review Team calls for increasing the effectiveness of the fish passage barrier (Recommendation QN4). This would make it even more unlikely that wild salmon and steelhead would be able to utilize the reach above the hatchery.



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

We strongly urge the Fish and Wildlife Service to revise the Hatchery Review document to fully discuss the upstream fish passage barrier issue at the Quinault facility and to adopt recommendations to restore full passage of native salmonids past the Quinault hatchery into the unutilized habitat upstream.

If you would like to discuss these comments in more detail, please contact Bob Metzger, Aquatic Program Manager. He can be reached at (360) 956-2293 or [rpmetzger@fs.fed.us](mailto:rpmetzger@fs.fed.us).

Sincerely,



DALE HOM  
Forest Supervisor

cc: Dean R Millett  
Dean Yoshina  
Phillip J DeCillis  
Marc McHenry

## USFWS Olympic Peninsula Hatchery Review Team

*Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

### **Comment from Hoh River Trust, Phil Davis, Executive Director**

We are pleased to see the work that is going in to understanding the challenges we face to reform hatchery practices and proposing solutions that are sensitive to the many constituents. We of course are particularly interested in your analysis and recommendations on the Hoh River where there is arguably some of the best habitat for healthy steelhead populations in the lower 48. If through reform of hatchery practices on the Hoh we can ultimately manage the river "under a natural production only strategy", as you conclude in your analysis, that would be quite a worthy outcome.

USFWS Olympic Peninsula Hatchery Review Team  
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ABLE GUIDE SERVICE  
ROY MORRIS, JR.  
231 VISTA DRIVE SEKIU, WA. 98381  
360-963-2442  
able@olyphen.com

Doug DeHart

Re: US Hatchery Programs in Washington

Thank you for a quality program in Port Angeles. You were patient and informative while welcoming input. That is the best way to have public support. I just concluded the scoping process with the OCNMS and am working with staff on a new management plan as well. I am working on the Lake Ozette Sockeye Recovery Steering Committee. I have worked with WDFW imprint ponds on the Clallam River (discontinued due to build stock mixing), as well I was on a team several years back to figure out what to do with 400,000 surplus Chinook from the Makah Hatchery. We wanted to use Falls Creek (a non producing stream in Sekiu Bay) but straying to HoKo, Clallam, Pysht, Sekiu was a threat. More needs to be done to help decide what to do with surplus hatchery stock generations to increase fishers opportunities while not damaging wild stock recoveries.

My recommendation:  
Hoh River Wild Steelhead Only

Let's see what unmolested wild stocks can do.

Signed/ Roy Morris, Jr.

P.S., I did data collection as a Fisheries Tech II for the second dam on the Cowlitz in 1965. I've been around awhile.



# USFWS Olympic Peninsula Hatchery Review Team

## *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*



April 1, 2009

Doug DeHart  
Science and Hatchery Reform Team Leader, Fishery Resources  
U.S. Fish and Wildlife Service  
911 NE 11<sup>th</sup> Avenue  
Portland, OR 97232

Dear Dr. DeHart,

Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's 261-page draft report: *Quilcene, Quinalt, and Makah National Fish Hatcheries: Assessments and Recommendations*. We understand the Hatchery Review Team undertook a four-year effort to evaluate and initiate reform for twenty-four hatcheries owned or operated by the Service, including three National Fish Hatcheries managed on the Olympic Peninsula.

We commend the Team for their detailed evaluations and commitment to recommend actions that minimize genetic, demographic, ecologic and pathologic risks to wild salmonid populations in order to afford future generations the cultural and economic benefits these fisheries provide. Though dwindling, Olympic Peninsula populations remain the most diverse and relatively abundant in the State of Washington. We believe holistic and integrated conservation strategies, including hatchery reform, are critical to the long-term viability and productivity of these populations.

We also understand that the Service has a fiduciary responsibility to the treaty tribes acknowledged in the draft report and would like to draw attention to a particular matter. Should facility/program cessation be enacted as a conservation measure for a stock currently diminished in total abundance (as recommended for the Hoh winter steelhead program) we suggest that all factors contributing to population decline be considered, including sport fishery impacts. Consideration of measures beyond hatchery reform will increase the likelihood of recovering the desired wild run timing component, while spreading the burden of this recovery between the co-managers.

On the Hoh River, for example, this may entail reducing or eliminating the accumulative recreational fishery impact in critical spawning areas (e.g., those areas coterminous with National Park Service owned lands). A more aggressive approach

### INTERNATIONAL HEADQUARTERS

721 NW Ninth Avenue, Suite 300 • Portland, Oregon 97209 USA • tel: 503.222.1804 • fax: 503.222.1805  
info@wildsalmoncenter.org • www.wildsalmoncenter.org

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

would eliminate recreational fisheries on early run winter steelhead from the highway 101 bridge upstream for a period of at least three generations to determine if measurable results in productivity and abundance were achievable. Additionally, we believe any proposed program cessation should be coupled with exploration of market-based incentives in order to mitigate for potential financial losses incurred (e.g., Fair Trade, Marine Stewardship Council).

Overall, we support the Service's intent to reform hatchery programs on the Olympic Peninsula. After reviewing the draft report and attending the February 19<sup>th</sup>, 2009, public meeting in Port Angeles, Washington, we offer support for the following recommendations:

- 1) Quilcene NFH Coho: QL1 (pg 43); QL2 (pg 43); QL5a (pg 44); QL7A(a) (pg 45); QL7B(b) (pg 46); QL8 (pg 46); QL12 (48); QL16 (pg 49); QL17 (pg 49); QL19 (pg 50); and QL20 (pg 50).
- 2) Quinalt NFH Steelhead, Hoh River Release: QN32 (pg 124); QN34 (pg 126); QN36 (pg 126); QN37 (pg 127); QN38 (pg 127); and QN39 (pg 127).
  - a. Alternative 6: Terminate the program and manage salmon and steelhead in the Hoh River for natural production only in the long-term (pg 132).
  - b. Recommended Alternatives: Short-term, elimination of Allen's Bar 50,000 smolt release for first five years (pg 132); Mid-term, aggressive habitat restoration while developing program goals and improving quality of Chalaar Creek facility (pg 133).
- 3) Makah NFH Fall Chinook: MK1 (pg 199); MK2 (pg 199); MK3a (pg 200); MK6 (pg 202); MK7 (pg 202); MK12 (pg 203); MK13 (pg 203); and MK14 (pg 203).
  - a. Alternative 1: Determine carrying capacity of the upper watershed and the ability of the watershed to maintain a self-sustaining natural population (pg 221).
- 4) Makah NFH Coho: MK19 (pg 217); MK20 (pg 217); MK21a (pg 218); MK25 (pg 219); and MK26a,b (pg 220).
- 5) Makah NFH Winter Steelhead: MK27 (pg 235); MK31 (pg 236); MK40a,b (pg 239); MK41 (pg 239); and MK43a (pg 239).

INTERNATIONAL HEADQUARTERS

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info@wildsalmoncenter.org • www.wildsalmoncenter.org

## USFWS Olympic Peninsula Hatchery Review Team

### *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

Finally, on page 121 (first bulleted paragraph, last sentence) the report states that snorkel survey and habitat data regarding habitat availability, quality, and utilization by juvenile salmonids was not available. While we understand it is preferred to acquire this information from the tribal Natural Resource Department, we offer to the Service full access to data we have collected over a period of eight years. Wild Salmon Center biologists conducted an intensive monitoring and research program focused on tributary productivity and juvenile salmonid usage from 2000 to 2007. A summary of this information can be downloaded at:

[http://www.wildsalmoncenter.org/pdf/WSC\\_Hoh\\_Tributary\\_Report.pdf](http://www.wildsalmoncenter.org/pdf/WSC_Hoh_Tributary_Report.pdf)

Hard copies are available upon request.

Thank you for accepting our letter via e-mail. Should you have any questions, we ask that you contact Devona Ensmenger, Washington Programs Coordinator, by phone at (360) 640-2631 or by e-mail at [devona@wildsalmoncenter.org](mailto:devona@wildsalmoncenter.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Guido', with a long horizontal stroke extending to the right.

Guido Rahr  
President and CEO  
Wild Salmon Center

cc: Michael Schmidt, Director of Fish Programs/USFWS Hatchery Review Team  
Faciliator, Long Live the Kings

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

To: **Doug DeHart**  
**U.S. Fish and Wildlife Service**  
**Fishery Resources**  
**911 NE 11th Avenue**  
**Portland, OR, 97232.**  
**March 19, 2009**  
From: **The Wild Steelhead Coalition**  
Re: **Comments on the Draft USFWS Olympic Peninsula National Fish Hatchery Assessments and Recommendations Report**

The Wild Steelhead Coalition respectfully submits the following comments on the *Draft USFWS Olympic Peninsula National Fish Hatchery Assessments and Recommendations Report*. We are very pleased to see this careful and thorough review, and commend the review committee for their efforts to evaluate existing hatchery programs and practices in our National Fish Hatcheries in the Columbia River Basin and on the Olympic Peninsula. In this letter we limit our comments to the review of hatchery practices in the Hoh River Basin, a watershed that we, along with the review committee and many others, feel is unique for its potential to support highly productive and ecologically significant wild steelhead and salmon populations and sustainable and valuable fisheries.

Overall, we support the committee's preferred alternative #6, managing Hoh River steelhead for natural production only. We feel that eliminating hatchery releases on the Hoh are warranted due to the current ecological and genetic risks that are posed by the current program, and the lack of good alternatives for developing an improved hatchery program. We also feel that the hatchery program supports a harvest management regime that poses significant ecological risks to the long-term health, diversity, and productivity for this stock. Specifically, any hatchery operation designed to sustain a separate run timing between hatchery and wild stocks promotes intense harvest fisheries on the hatchery population. The resulting high-intensity, lower-river mixed-stock harvest fisheries in turn promote sustained depletion of any early returning components of the wild population. Thus, we are concerned that strong links between hatchery and harvest policies on the Hoh River continue to pose barriers to the recovery of the diversity, productivity, and abundance of the basin's winter-run wild steelhead populations. An obvious way out of this undesirable situation is to couple the elimination of the hatchery program with a new harvest management regime that has substantially lower harvest rates applied across the entire run-timing of the naturally returning population(s). Because the Hoh River's habitat remains largely intact, and because there are ongoing efforts to improve fish habitat where it is now degraded in this watershed, we are confident that a new management regime focused on sustaining the diversity and abundance of anadromous fish will also sustain productive and valuable fisheries for tribal and non-tribal anglers.

In the short term, we also support the committee's Alternative 1 while the Service works with the Tribal and State co-managers and the National Park Service to develop a long-term steelhead management strategy for the Hoh River. However, we also believe that substantial short-term investments into improving existing hatchery operations should be critically evaluated against the opportunity costs for investing in habitat improvements that can yield lasting benefits for the ecosystem that supports the Hoh River Basin's anadromous and resident fish, as well as its wildlife.

## USFWS Olympic Peninsula Hatchery Review Team

*Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

Again, we thank the U.S. Fish and Wildlife Service for their efforts to improve the performance of our National Fish Hatcheries in the Pacific Northwest, and for the opportunity to provide input to this worthwhile process.

Sincerely,

Nate Mantua  
VP of Science  
Wild Steelhead Coalition  
218 Main St. Box #264  
Kirkland, WA 98033

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



April 6, 2009

Doug DeHart  
U.S. Fish and Wildlife Service  
Fishery Resources  
911 NE 11th Avenue  
Portland, OR, 97232

**Re: Comments on the Draft USFWS Olympic Peninsula National Fish Hatcheries Assessments and Recommendations Report**

Dear Dr. DeHart:

Trout Unlimited (TU) appreciates the opportunity to comment on the Draft USFWS Olympic Peninsula National Fish Hatchery Assessments and Recommendations Report, and commends the review team for its thorough and objective analysis of the USFWS's Olympic Peninsula hatcheries. Trout Unlimited's mission is to conserve, protect and restore the nation's cold-water fisheries and their watersheds. With approximately 140,000 members across the country including Washington State, TU is the nation's largest trout and salmon conservation organization. Our comments focus on the Hoh River steelhead section of the draft report.

The Hoh River is particularly well suited for wild steelhead management, in light of its mostly intact and improving watershed. In contrast with many rivers in Washington State, it does not have a hatchery, but rather uses outplants from the Quinalt National Fish Hatchery to provide steelhead for tribal and sport harvest. As the Draft Report accurately explains, there are many genetic, ecological and demographic risks posed to wild Hoh River steelhead by the outplants from the Quinalt Fish Hatchery. For these reasons, Trout Unlimited supports the Review Team's recommendation to implement Alternative 6 – managing the Hoh River exclusively for natural production. It also bears emphasis that Alternative 6 is most consistent with Washington's recently adopted State Steelhead Management Plan (SSMP). The SSMP's Natural Production Policy states: "Steelhead management shall place the highest priority on the protection of wild steelhead stocks to maintain and restore stocks to healthy levels."

Trout Unlimited respects the treaty-based fishing rights of the Hoh Tribe, and understands the importance of salmon and steelhead harvest to the Tribe's economy and culture. For that reason, we support a transition period to natural production only management during which actions to address the Tribe's interests can be identified and implemented. We believe, however, that the proposed 15 year period before natural production-only management would take effect is too long and will unnecessarily delay the substantial gains to be realized from managing the Hoh River for wild steelhead. Instead, TU supports the Review Team's recommendation to implement Alternative 1 in the short-term (5 years) and then implementation of natural production only management thereafter.

*Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization*  
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## USFWS Olympic Peninsula Hatchery Review Team

### *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

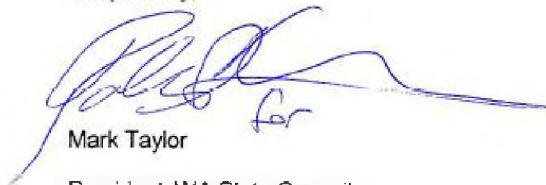
The Review Team's mid-term (5-15 years) recommended alternative seems to suggest the development of a new Hoh River hatchery, which is inconsistent with the long-term recommendation of natural production only management, and therefore is confusing. It appears that the mid-term recommended alternative is actually intended as an alternative to the long-term recommendation of natural production only and should be characterized as such in the final report.

While there is no disputing that the elimination of hatchery outplants will eliminate a commercial harvest opportunity for the Hoh Tribe and a mark-selective sport fishery in the short-term, the implication is that there will not be new fishing opportunities in the future structured around natural production. We don't believe that assumption is well founded. Over time, we believe that new fisheries could be developed that would provide more opportunity than currently exists as the wild population recovers, and those new fisheries should be consistent with the Hoh Tribe's treaty rights. For example, a tribal harvest fishery could be developed that, while harvesting fewer fish, could be certified as sustainable and marketed in a manner that increases overall economic return to the Tribe.

Lastly, we are concerned that the review perpetuates the myth that early-timed hatchery steelhead outplants are temporally segregated from wild Hoh River steelhead and thus do not pose a risk to wild steelhead. While it is true that today most wild steelhead return to the Hoh after the hatchery fish return, that fact was not true historically. Historical data support the fact that a large portion of the wild steelhead run returned in December and January. Those early-timed fish have been severely depleted by fisheries targeting early-timed hatchery fish. A primary co-manager goal should be to restore the early-timed part of the wild run, which would greatly increase temporal diversity within the wild population and make it more resilient in the face of global warming and other stressors. The final report should be revised accordingly.

Again, TU appreciates the opportunity to comment on the Draft Report and the consideration that will be given to our comments.

Respectfully,



Mark Taylor  
President, WA State Council



Rob Masonis  
Vice President for Western Conservation

*Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization*  
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USFWS Olympic Peninsula Hatchery Review Team  
*Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*



***Puget Sound Anglers  
North Olympic Peninsula Chapter  
PO Box 2726  
Sequim, Washington 98382***

February 25, 2009

US Fish and Wildlife Service  
Pacific Region Fishery Resources  
911 NE 11<sup>th</sup> Avenue  
Portland Oregon, 97232

Attn. Mr. Douglas Dehart

Subject: Quillcene, Quinault, and Makah National Fish Hatcheries Assessment and Recommendations.  
Draft Report, February 2008

Reference: Recovery Plan for Southern Resident Killer Whales (SRKW) Orcinos Orca, Prepared by  
NOAA/ National Marine Fisheries Service (NMFS) , Northwest Regional Office, 1/17/2008.

Dear Mr. Dehart,

The approximately 200 members of the North Olympic Peninsula Chapter – Puget Sound Anglers are supportive of expansion of Chinook salmon production at all of the federal fish hatcheries on the Olympic Peninsula. We strongly favor the effort to stabilize and help in the re-building of the Southern Resident Killer Whale (SRKW) population. A highlight of any fishing trip for our members is the opportunity to see Orcas pass by. While their presence can hurt the fishing, it is still inspiring to see them.

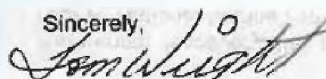
A literature review and discussions with members of our Chapter and others in the community who are very familiar with the SRKW pods shows the high importance of Chinook salmon in their diets. The human impact on the viability of our rivers and streams for natural salmon production is very evident. Hatchery supplementation can help mitigate the lost production capability and that is good for the SRKW. Any expansion of salmonid production by the hatcheries in question would be a benefit for entire area.

We would recommend that Alternative 2 with recommendations, Scenario 1, which would increase fall Chinook juvenile production to 2.65 million be implemented immediately (2009 brood year) and production be ramped up as quickly as possible to 3.1 juveniles.

Additionally, Alternative 2, Scenario 2 should be evaluated by USF&WS and the Co- Managers for future adoption and implementation. The adoption and implementation of Alternative 2, Scenario 2 would additionally support the goal of increasing the SRKW prey base as identified in the Recovery Plan.

I'd also like to add our thanks to you and your staff for the work done so far on this planning process. We also appreciate the efforts being made for conservation work dealing with wild stock returns.

Sincerely,

  
Tom Wright, President

## USFWS Olympic Peninsula Hatchery Review Team

### *Olympic Peninsula NFHs Assessments and Recommendations Report – May 2009*

February 23, 2009

US Fish and Wildlife Service  
Pacific Region Fishery Resources  
911 NE 11<sup>th</sup> Avenue  
Portland Oregon, 97232

Attn. Mr. Douglas Dehart

Subject: Quilcene, Quinault, and Makah National Fish Hatcheries Assessment and Recommendations, Draft Report, February 2009

Reference: Recovery Plan for Southern Resident Killer Whales ( SRKW ) Orcinos Orca, Prepared by NOAA/ National Marine Fisheries Service (NMFS) , Northwest Regional Office,1/17/2008.

Sir,

A stated action of the Reference SRKW Recovery Plan deals with Prey Availability and states;

“ Support Salmon restoration efforts in the region including habitat, harvest, and hatchery management considerations and continued use of existing NMFS authorities under the ESA and Magnuson- Stevens Fishery Conservation and Management Act to ensure an adequate prey base”

A preferred prey of the listed SRKW is Chinook salmon and any action that increases the number of Chinook salmon available to the SRKW is desirable and defensible. The Makah National Fish Hatchery produces fall Chinook salmon juveniles for release which ultimately contribute to the SRKW prey base off the West coast of Vancouver Island and in US waters.

The following recommendation is specific to the Makah National Fish Hatchery, Neah Bay, Washington and supplements my verbal comments provided during the public review meeting of the subject report at Port Angeles, WA On 2/19/2009.

The fall Chinook section of the subject report recommends adoption of Alternative 1 with recommendations, to obtain a fall Chinook production level of 2.3 million juveniles.

I recommend that Alternative 2 with recommendations, Scenario 1, that would increase fall Chinook juvenile production to 2.65 million be implemented immediately (2009 brood year) and production be ramped up as quickly as possible to 3.1 juveniles. Alternative 2, Scenario 2 should be evaluated by USF&WS and the Co- Managers for future adoption and implementation. The adoption and implementation of Alternative 2, Scenario 2 would additionally support the goal of increasing the SRKW prey base as identified in the Recovery Plan.

Thank you for accepting my recommendation and the opportunity to review the excellent plan.

Sincerely,

Walt Blendermann  
120 Windsong Lane  
Sequim, WA 98382



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**U.S. Fish and Wildlife Service**  
[www.fws.gov](http://www.fws.gov)

**For Columbia River Basin Hatchery Review Information**  
[www.fws.gov/pacific/Fisheries/Hatcheryreview/](http://www.fws.gov/pacific/Fisheries/Hatcheryreview/)

**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.**

**May 2009**

