



September 23, 2008

To: Phil Anderson and Heather Bartlett  
Washington Department of Fish and Wildlife  
From: Wild Steelhead Coalition

Dear Phil and Heather,

We would like to submit this letter as a comment on the recent WDFW proposal to close the Tokul Creek steelhead hatchery and to create a wild steelhead management zone (WSMZ) in all or part of the Snoqualmie River. The Wild Steelhead Coalition has an intense interest in the implementation of steelhead hatchery reforms and in the creation of WSMZs in order to improve the future for Washington's wild steelhead and steelhead fisheries.

We are genuinely pleased to see a proposal like this that is aimed at implementing significant changes in steelhead management in the Snoqualmie River. However, we are troubled by several aspects of this proposal. Specifically, we believe that the Snoqualmie River is not the best choice for a WSMZ in the Snohomish Basin, and that shifting 150,000 smolt releases to another part of the Snohomish (like the Wallace River) would substantially increase risks to wild steelhead in the Skykomish River while at the same time offering little return in the way of improved fishing opportunities. We believe instead that the Skykomish River, with its greater amount of habitat and historically more robust wild steelhead population, is a better watershed for creating a WSMZ which should support a robust wild steelhead population and world class fishing opportunities. Additionally, we are aware of no evidence that substantial increases in hatchery smolt releases have brought benefits to any Puget Sound steelhead fishery in recent years. In fact, for most of the large steelhead programs in Puget Sound, increased smolt releases in the past few decades have come with reduced adult returns for both wild and hatchery steelhead. In summary, it is not clear to us that implementation of the Tokul Creek proposal would be the best choice for improving the future for Snohomish Basin wild steelhead and steelhead fisheries.

More generally speaking, we feel that WDFW still needs to develop and communicate a clear vision for managing steelhead in the future. Once that clear vision is established, it will be possible to evaluate the rationale for major management reforms. We also believe that WDFW will have much more success in attracting support for reforms by sharing this vision and then involving stakeholders in the development of regional management plans.

Our vision for a better future for Washington's wild steelhead and steelhead fisheries includes networks of Wild Salmonid Management Zones that support world class fisheries in addition to providing refugia for the ecosystems that support robust and productive wild steelhead populations. Our criteria for guiding the placement of WSMZs includes the following:

1. We believe that WSMZs should be created within an ESU-level approach that considers how each program fits together in a network that supports the broader mission of improving the future for Washington's wild steelhead and steelhead fisheries.
2. We support creating WSMZs in watersheds that currently have the strongest wild stocks and the greatest potential for supporting abundant, diverse, and productive wild steelhead populations and wild steelhead fisheries.
3. We support implementation of the HSRG recommendations for hatchery programs that include appropriately sizing smolt production with respect to affected watersheds, estuaries and ecosystems, and eliminating outplants into sites lacking adult trapping facilities. In situations where there is evidence that current smolt production levels are far in excess of an optimal tradeoff between ecological risks and harvest fishery benefits, we would like to see total smolt production substantially reduced in many watersheds, and not simply reallocated to different release sites within watersheds.
4. We support a careful and comprehensive evaluation of the past and current performance of existing hatchery operations, including key metrics like smolt-to-adult return rates, the cost of producing hatchery fish for harvest, and the potential cost savings expected from changes in hatchery operations.
5. We support a new focus on improving the quality of smolts released, rather than increasing the quantity of smolts released, in any hatchery program in the future.

We understand that any proposal to close a salmon or steelhead hatchery will lead to fierce backlash by some members of the angling community. We also understand that WDFW is faced with a tight budget, ESA requirements, and a diverse collection of stakeholders, such that the agency will need to make tough choices about future policies. However, we are hopeful that these choices will integrate conservation actions and cost savings through implementation of hatchery and harvest reforms and the creation of WSMZs in ways that will lead to a better future for Washington's wild steelhead and steelhead fisheries.

We appreciate and support WDFW's efforts to reshape steelhead management in Washington State, and would like to do whatever we can to assist you in these efforts.

Sincerely,

Nate Mantua  
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Wild Steelhead Coalition  
[www.wildsteelheadcoalition.com](http://www.wildsteelheadcoalition.com)