

Hatchery Scientific Review Group

Pacific Salmon Hatchery Reform

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HSRG - Washington

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December 23, 2015

William W. Stelle, Jr.
Regional Administrator
NMFS West Coast Region
7600 Sand Point Way NE
Seattle, WA 98115

SUBJECT: Review of Draft Environmental Impact Statement to Analyze Impacts of NOAA's National Marine Fisheries Service Proposed 4(d) Determination under Limit 6 for Five Early Winter Steelhead Hatchery Programs in Puget Sound

Dear Mr. Stelle,

The Hatchery Scientific Review Group has reviewed the DEIS for Puget Sound Early winter Steelhead and would like to provide the following comments. We have limited our comments to the method of analysis and proposed standards for the genetic impacts of hatchery steelhead on native populations of steelhead found within those basins.

We believe the DEIS adequately identifies the general mechanisms through which hatchery programs can affect natural-origin salmon and steelhead populations (Table 6 page 44), Chapter 3, Affected Environment, and Appendix B, Genetic effects analysis of early winter steelhead programs proposed for the Nooksack, Stillaguamish, Dungeness, Skykomish, and Snoqualmie River Basins of Washington.

In addition the DEIS includes an accurate list of recent (last 5 years) risk reduction measures implemented by WDFW at hatcheries producing early winter steelhead in Puget Sound (Chapter 3 page 48).

The DEIS proposes a logical, scientifically based method for analysis and appropriate standards (pHOS/PEHC), for assessing the genetic risks from hatchery populations to affected natural populations (Sec 3.2.3.1). In addition the DEIS states: *"Considering all the guidance, and empirical and theoretical information currently available, NMFS concludes that gene flow from EWS into Puget Sound steelhead populations may not pose significant risk to the Puget Sound*

steelhead populations, provided the gene flow rate is low, that appropriate metrics are developed to estimate gene flow, that gene flow is estimated with a reasonably high level of certainty, and that adequate monitoring is in place to ensure that gene flow criteria are met". (Appendix B page 7). We strongly support this statement.

We hope you find these comments useful.

Sincerely,



Andy Appleby
Co-Chair
Hatchery Scientific Review Group



Peter Paquet
Co-Chair
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cc: Barry Thom, Deputy Regional Administrator West Coast Region, NOAA
Jim Unsworth, Director, Washington Department of Fish and Wildlife