



United States Department of the Interior
NATIONAL PARK SERVICE

Olympic National Park
600 East Park Avenue
Port Angeles, Washington 98362-6798

March 23, 2010

Robert Elofson
Lower Elwha Klallam Tribe
2851 Lower Elwha Road
Port Angeles, Washington 98363

Dear Mr. Elofson:

Thank you for the opportunity to comment on the future of the Elwha Tribe's Chambers Creek hatchery steelhead program in the context of Elwha River ecosystem and fisheries restoration. We offer our comments in the context of the National Park Service's management objectives. We appreciate your request for technical input from fisheries scientists at Olympic National Park (ONP), as decisions made today will affect the long-term management and conservation of Elwha River winter steelhead.

There are inherent challenges associated with discontinuing Chambers Creek stock with respect to important tribal fisheries in the lower river. ONP recognizes and respects tribal treaty rights and is committed to fulfilling our trust responsibilities to the tribes and cooperative management objectives with the State of Washington. We also recognize the economic importance of the Chambers Creek stock to tribal and non-tribal fisheries. However, at the heart of the Elwha project is the restoration of *native* fish populations throughout the Elwha watershed that will support viable fisheries in the future.

The scientific and technical recommendations from ONP fishery scientists are to discontinue hatchery releases of Chambers Creek steelhead in the Elwha River prior to dam removal. The removal of non-indigenous hatchery steelhead from the Elwha basin will greatly reduce or eliminate many genetic and ecological risk factors to wild steelhead and other native fish. Due to their long period of domestication, Chambers Creek steelhead pose genetic risks to existing wild steelhead and rainbow trout populations through genetic mixing which could lead to the loss of biological and life history diversities. Additionally, non-indigenous Chambers Creek steelhead present competition and predation risks to native steelhead and other wild salmonids in the Elwha River.

The years immediately after dam removal represent a vulnerable period for native fish in the upper Elwha River in the presence of Chambers Creek steelhead. The early migration timing of non-indigenous steelhead may result in competitive advantages for hatchery fish since they would be among the first to spawn and rear in the newly opened habitats in Olympic National Park.

Additionally, future releases of Chambers Creek steelhead would result in straying of non-indigenous fish into park waters, particularly during the years of the fishing moratorium.

Another important consideration regarding Chambers Creek steelhead is the threat of pathogen amplification and transmission into naïve populations that have not been previously exposed to pathogens, particularly after dam removal. Of particular concern is the emergence of the serious viral disease, infectious hematopoietic necrosis virus (IHNV) which has been associated with winter steelhead in other Peninsula rivers. To date, IHNV has not been detected in the Elwha River and we recognize that the Tribe implements rigorous fish health standards. However, the 2009-10 outbreak of (IHNV) in Chambers Creek hatchery steelhead in the nearby Bogachiel River is an important reminder of pathogen risks associated with non-indigenous steelhead stocks. The continued releases of Chambers Creek steelhead could introduce IHNV or other pathogens to naïve salmonid populations that have been isolated above the dams. The members of a naïve population can be more susceptible to new pathogens and exposure may be more severe, if not lethal.

The discontinuation of hatchery releases of non-indigenous Chambers Creek steelhead is consistent with the intent of the Elwha Ecosystem and Fisheries Restoration Act and the goal of “full restoration of the Elwha River ecosystem and native anadromous fisheries”. The restoration of natural production of winter steelhead also is in accordance with National Park Service management and conservation objectives. The NPS management policies (2006) direct park managers to rely on natural processes to maintain *native* aquatic species and their habitats. The ecological integrity of the Elwha River is dependent upon management that conserves natural behaviors and genetic variability of anadromous salmonids.

We believe that the elimination of Chambers Creek hatchery steelhead releases at this time provides the best opportunity for restoration of Elwha River wild steelhead. Successful restoration of Elwha River steelhead will depend upon: 1) recolonization by native winter steelhead; 2) implementation of the fishing moratorium agreed upon by the Tribe, State, and park to protect Elwha salmonids; and 3) reliance upon existing native rainbow trout populations (~7,000 rainbow trout excluding the two reservoirs) that inhabit the river above the dams to contribute to natural production.

We commend the Lower Elwha Klallam Tribe for its evaluation of the Chambers Creek hatchery steelhead program and recognize that this is a difficult decision for the Tribe. The removal of Elwha River dams presents a rare opportunity to restore native wild steelhead and reduce the genetic and ecological risks posed by non-indigenous steelhead will be central to this process. Thank you for your consideration of our recommendations.

Sincerely,

Sam Brenkman and Pat Crain
Chief Fisheries Biologists, Olympic National Park

Cc:

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