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December 2, 2020

Via Certified Mail – Return Receipt Requested

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Olympia, Washington 98504-3200

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RE: Notice of Intent to Sue WDFW for Violations of Section 9 of the Endangered Species Act Resulting from Skykomish River Steelhead Hatchery Program

Dear Director Susewind and Washington Fish & Wildlife Commissioners:

This letter provides notice of Wild Fish Conservancy's ("Conservancy") intent to sue the Washington Department of Fish and Wildlife and, in their official capacities, Director of the Washington Department of Fish and Wildlife Kelly Susewind and Commissioners of the Washington Fish and Wildlife Commission Larry Carpenter, Barbara Baker, James Anderson, David Graybill, Robert Kehoe, Molly Linville, Donald McIsaac, Bradley Smith, and Kim Thorburn (collectively, "WDFW") for violations of section 9 of the Endangered Species Act ("ESA"), 16 U.S.C. § 1538. This letter is provided pursuant to section 11(g) of the ESA, 16 U.S.C. § 1540(g).

In 1969, wild steelhead were declared Washington's official "state fish." Despite that recognition, wild steelhead populations have been depressed for some time and remain diminished. Wild Puget Sound steelhead have declined precipitously over the past thirty years: the average region-wide abundance between 1980 and 2004 was less than 4% of what it was in 1900. Since being listed as threatened under the ESA in 2007, Puget Sound wild steelhead abundance has continued to decline. The recent five-year average is less than 3% of what it was in 1900.

The National Marine Fisheries Service ("NMFS") excluded "Chambers Creek" winter steelhead and "Skamania" summer steelhead from the 2007 ESA-listing of the Puget Sound steelhead distinct population segment ("DPS") because those hatchery stocks are genetically diverged from the local native populations. 72 Fed. Reg. 26,722, 26,722 (May 11, 2007). This divergence in Chambers Creek stock is due to decades of domestication in hatchery environments while Skamania steelhead are both highly domesticated and from an out-of-DPS increasing the potential for passing on maladaptive traits to the native Skykomish steelhead population. *See* Letter to Director Unsworth (WDFW) from Bary Thom (NMFS) (July 21, 2017). NMFS also found that efforts to prevent natural spawning of those hatchery fish is unlikely to be completely effective, "with significant potential to reduce natural productivity." *Id.* at 26,728. Despite these findings, WDFW continued to implement hatchery programs using these stocks and without undergoing review, approval, and restrictions required by the ESA. Wild Fish Conservancy sued WDFW for operating these programs in violation of the ESA; first in 2014 for the Chambers Creek steelhead programs and then in 2019 for the Skamania steelhead programs.

The consent decree entered in the latter of those lawsuits required, *inter alia*, that WDFW discontinue releases of Skamania steelhead in Puget Sound watersheds that are not authorized under the ESA with the exception of releases to the Skykomish River. For the Skykomish River, the consent decree allows for decreasing annual releases that terminate with a release of 40,000 fish in 2022, after which releases are prohibited unless they have been approved under the ESA.

Apparently determined to maintain artificial steelhead propagation in the Skykomish River to support recreational fisheries, WDFW submitted a hatchery and genetic management plan ("HGMP") dated April 12, 2019 to NMFS proposing to implement an integrated South Fork Skykomish River summer steelhead program. The HGMP explains that the program will develop stock by collecting up to 30% of the wild, natural-origin, summer steelhead returning to the Sunset Falls fishway, or up to 120 fish, during the first four years of the program. Those adult steelhead will be trapped from July through October and held in captivity at Reiter Ponds and/or Wallace River hatchery facilities until ready to be spawned. Once ripe, WDFW will lethally or live spawn the fish at those hatcheries. The program will target an annual release of 116,000 yearling steelhead from Reiter Ponds and/or the Wallace River hatchery facilities. Once adult hatchery summer steelhead begin to return to the Skykomish River from this new program, WDFW will incorporate those hatchery-origin fish into the broodstock, along with the natural-origin steelhead.

WDFW's HGMP provides that South Fork Skykomish summer steelhead are not recognized as a demographically independent population ("DIP") and asserts that they are therefore not included in the ESA-listed Puget Sound steelhead distinct population segment ("DPS"). HGMP 3. However, the HGMP also explains that an objective of this program is to conserve and recover the North Fork Skykomish River summer steelhead DIP, which is included within the ESA-listed Puget Sound steelhead DPS. Further, the South Fork Skykomish River, above and below Sunset Falls, is designated critical habitat for threatened Puget Sound steelhead. *See* 50 C.F.R. § 226.212(a)(15), (u)(7)(i). Salmonids generally, and summer steelhead especially, stray to non-natal fresh water bodies before spawning in their natal streams. It is therefore almost certain that some of the fish trapped at Sunset Falls are North Fork Skykomish River summer steelhead or another DIP recognized as part of the threatened Puget Sound steelhead DPS. *See, e.g.,* Kassler, Todd W., et al., Summer-Run Hatchery Steelhead Have Naturalized in the South Fork Skykomish River, Washington, 137 Transactions of the Am. Fisheries Soc'y 763–771, 768 (2008) (indicating a portion of adult summer steelhead encountered at Sunset Falls are North Fork Skykomish steelhead). WDFW admitted as much when it identified broodstock collection activities at Sunset Falls as an activity that may lead to take of ESA-listed species. HGMP 19. Moreover, this new integrated steelhead propagation program will harm and otherwise "take" ESA-listed fish through various genetic and ecological interactions, as recognized by WDFW in its April 12, 2019 HGMP. *See* HGMP 19–22.

WDFW nonetheless commenced this new hatchery program prior to NMFS reviewing and approving the HGMP and prior to NMFS or the U.S. Fish and Wildlife Service ("FWS") providing an authorization for WDFW to "take" ESA-listed species. WDFW also developed and implemented this program without evaluating and disclosing to the public the environmental impacts in violation of the State Environmental Policy Act ("SEPA").

Available data obtained from WDFW's In-Season Hatchery Escapement Reports indicate the following transfers (capture and live-ship via truck) of "wild, W" steelhead from the South Fork Skykomish Sunset Falls Fishway to Reiter Ponds were made:

- April 16 2020 report: 52 W (final in-season estimate);
- November 25 2020 report: 36 W.

Of the wild steelhead held in Reiter Ponds between October 2019 and March 2020, 29 were lethally spawned on or about March 19 and 101,300 eggs were taken. Further, the WDFW Escapement Reports document one additional wild steelhead mortality at Reiter Ponds. We presume that the 36 "W" transferred to Reiter Ponds documented in the November 25 2020 report are currently being held in captivity there, and those still alive will be spawned in early 2021. We have no data on mortalities of juvenile steelhead offspring resulting from the spawning of wild Skykomish summer steelhead at Reiter Ponds.

WDFW's implementation of this program in the absence of ESA-review or approval follows a long and disconcerting pattern of the agency willing to violate the ESA's prohibition on unauthorized "take" of protected species when it comes to artificial fish propagation. The Conservancy sued WDFW in 2002 and 2003 for operating hatcheries

throughout Puget Sound that “take” ESA-listed salmonids without any ESA authorization. The parties settled that litigation in 2003 with WDFW committing to apply for the required ESA reviews and authorizations and to encourage NMFS to complete the approval process in a timely manner. Remarkably, WDFW continues, more than thirteen years later, operating numerous hatcheries without NMFS’s authorization and in violation of the ESA and, for many of the programs, WDFW has not even submitted the plan required for NMFS’s review. *See* Attachment.

I. Legal Framework.

Section 9 of the ESA prohibits the “take” of endangered species by any person. 16 U.S.C. § 1538(a). This prohibition has generally been applied to species listed as “threatened” through regulations promulgated under section 4(d) of the ESA, 16 U.S.C. § 1533(d). Section 9 of the ESA prohibits violations of those regulations. 16 U.S.C. § 1538(a)(1)(G).

“Take” includes actions that harass, harm, pursue, wound, kill, trap, capture, or collect a protected species. 16 U.S.C. § 1532(19). “Harass” is defined to include acts that create the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns, which include breeding, feeding, or sheltering. 50 C.F.R. § 17.3. “Harm” includes significant habitat modification or degradation that kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering. *Id.*; 50 C.F.R. § 222.102.

II. Affected Species.

The Puget Sound DPS of steelhead was listed as a threatened species in 2007. 72 Fed. Reg. 26,722 (May 11, 2007); *see also* 79 Fed. Reg. 20,802 (Apr. 14, 2014) (revision to listing); 50 C.F.R. § 223.102. NMFS has applied the ESA section 9 take prohibition to this species. 50 C.F.R. §§ 223.102, 223.203(a).

The Puget Sound Chinook salmon evolutionary significant unit (“ESU”) is listed as a threatened species. 64 Fed. Reg. 14,308 (March 24, 1999); 70 Fed. Reg. 37,160 (June 28, 2005); *see also* 79 Fed. Reg. 20,802 (Apr. 14, 2014) (revision to listing); 50 C.F.R. § 223.102. NMFS has applied the ESA section 9 take prohibition to this species. 50 C.F.R. §§ 223.102, 223.203(a).

The coterminous United States bull trout population is listed as a threatened species. 64 Fed. Reg. 58,910 (Nov. 1, 1999). FWS has applied the ESA take prohibition to this species. 50 C.F.R. §§ 17.21 and 17.31(a).

III. Take Caused by WDFW’s Unauthorized Integrated South Fork Skykomish River Summer Steelhead Program.

WDFW’s new integrated South Fork Skykomish River summer steelhead program, as described in the April 12, 2019 HGMP, causes take through a variety of mechanisms and

activities. These include the broodstock collection activities, genetic introgression, ecological interactions, and increased fishing pressures.

A. Take Through Broodstock Activities.

All or some of the wild adult summer steelhead captured by WDFW, beginning in 2019, and taken to Reiter Ponds, Wallace River hatchery, and/or other hatchery facilities as part of broodstock collection activities are threatened Puget Sound steelhead protected under the ESA. WDFW is not authorized to take these fish.¹ WDFW's trapping, collection, transferring, holding, rearing, spawning, and killing of these fish constitute take of an ESA-listed species.

B. Take Through Genetic Introgression.

WDFW's new integrated South Fork Skykomish River summer steelhead program will cause take through genetic introgression. Fish become domesticated in a hatchery environment and thereby less fit to survive and reproduce in the wild. Genetic adaptation to captivity can occur rapidly, in a single generation even when wild steelhead are used for broodstock in a pure "conservation" hatchery program. This presents significant threats to wild populations even for purportedly integrated programs like that described in the HGMP. *See, e.g.,* Christie, Mark R., et al., Genetic Adaptation to Captivity Can Occur in a Single Generation, 109 Proceedings of the Nat'l Academy of Sciences 238–42 (2011); Willoughy, Janna R., et al., Long-term Demographic and Genetic Effects of Releasing Captive-Born Individuals into the Wild, 33 Conservation Biology 377–88 (2019); Willoughy, Janna R., et al., Captive Ancestry Upwardly Biases Estimates of Relative Reproductive Success, 108 Journal of Heredity 583–87 (2017). Moreover, genetic analysis indicates that many of the South Fork Skamania River summer steelhead have Skamania hatchery summer steelhead ancestry. Kassler, Todd W., et al., Summer-Run Hatchery Steelhead Have Naturalized in the South Fork Skykomish River, Washington, 137 Transactions of the Am. Fisheries Soc'y 763–771, 768 (2008). Hatchery fish produced by WDFW's integrated South Fork Skykomish River summer steelhead program have out-of-basin genetically heritable life history traits that contrast with most populations within the Puget Sound steelhead DPS.

Take of Puget Sound steelhead through genetic introgression occurs when summer steelhead produced in the new hatchery program spawn in the wild with wild fish, and thereby pass their maladaptive genes to the wild populations within the Puget Sound steelhead DPS. The resultant offspring have markedly reduced fitness, dying at a much higher rate before spawning than would occur with two wild parents and producing on average significantly fewer surviving offspring than two wild parents when they do survive to spawn. The genetic impacts from the new integrated South Fork Skykomish River summer steelhead program will most immediately and directly impact the ESA-listed North Fork Skykomish summer

¹ NMFS has issued an ESA section 10 permit, NMFS section 10 permit number 14433, for the trap and haul operations, whereby fish are collected at the Sunset Fall fishway and hauled 3.5 miles upstream above three falls. The broodstock collection activities are not included in and hence are not covered by this permit.

steelhead DIP; however, based on documented straying of the current Reiter Ponds Hatchery summer steelhead program, the Tolt summer steelhead DIP will likewise be impacted.

C. Take Through Ecological Interactions.

WDFW's new integrated South Fork Skykomish River summer steelhead program will cause take of ESA-listed Puget Sound Chinook salmon, Puget Sound steelhead, and bull trout through ecological interactions. Such take occurs through a variety of mechanisms.

WDFW's hatchery program causes take of ESA-listed salmonids through increased competition for food and space, including rearing and spawning territory. Take of ESA-listed salmonids also occurs through predation. This occurs when the hatchery fish, including smolts and residualized fish, prey on protected fish. The programs also cause take when hatchery fish—less fit for survival in the wild—attract predators that then consume ESA-listed fish. The program also causes take of Puget Sound steelhead through increased competition for spawning mates.

D. Take Through Fishery Effects.

WDFW's new integrated South Fork Skykomish River summer steelhead program will cause take of Puget Sound Chinook salmon, Puget Sound steelhead, and bull trout through lethal and sub-lethal fishery effects. WDFW's HGMP explains that all of the fish released from this program will be marked by clipping the adipose fin, making these fish available for angling. The resulting summer steelhead recreational angling enabled through this program will cause immediate and latent impacts to ESA-listed Puget Sound steelhead and bull trout. Research conducted in British Columbia found an estimated 15.0% of wild summer steelhead caught and released in a summer-run steelhead fishery did not survive to spawn. It is likely the immediate and latent mortality of summer steelhead caught and released in the Skykomish River watershed is greater given the physiological post-release stress caused by warmer water temperatures. The unpermitted integrated summer steelhead hatchery program will exacerbate these effects by increasing the angling pressure far above what it would otherwise be for the few remaining wild steelhead that exist, inhibiting recovery of the natural origin population to levels which could support a sustainable sport fishery in absence of a hatchery program.

IV. WDFW's Violations of Section 9 of the ESA.

WDFW is in violation of section 9 of the ESA, 16 U.S.C. § 1538, for implementing and funding the new integrated South Fork Skykomish River summer steelhead program described in the HGMP. As described above, these programs cause take of ESA-listed Puget Sound steelhead, Puget Sound Chinook salmon, and bull trout. This take is not authorized or exempt from liability under section 9 of the ESA. The descriptions provided above of take and of the hatchery program are based upon the information currently available to the Conservancy. The Conservancy intends to sue WDFW for all take of ESA-listed salmonids resulting from this new hatchery program.

The Conservancy's concerns regarding WDFW's new integrated South Fork Skykomish River summer steelhead program extend far beyond the mere lack of authorization for this program. This unauthorized hatchery program is currently affecting ESA-listed salmonids and their ability to recovery to a point where the protections of the ESA would not be necessary.

The congressionally-chartered Hatchery Science Review Group ("HSRG") has made clear recommendations regarding the maximum acceptable level of gene flow from integrated hatchery programs to wild conspecific populations and regarding the introgression of natural-origin fish into the broodstock along with hatchery-origin fish. These and/or similar requirements, including requirements intended to reduce take of ESA-listed species through ecological interactions, would be imposed on WDFW's new integrated South Fork Skykomish River summer steelhead program through any exemption from liability under section 9 of the ESA that may be granted, along with monitoring and evaluation requirements necessary to ensure compliance with such requirements. It is unlikely that WDFW would be able to fully comply with these requirements and the hatchery program will contribute to the continued decline of ESA-listed salmonids. And in any case, WDFW does not have such authorization now, and therefore their 2019 and 2020 take of unmarked and/or wild steelhead from the South Fork of the Skykomish and transfer to Reiter Ponds violated the ESA.

Accordingly, the Conservancy provides notice of its intent to sue WDFW to bring its new integrated South Fork Skykomish River summer steelhead program described in the HGMP into compliance with section 9 of the ESA. This includes complete compliance with any exemption from ESA liability for take that may be lawfully issued in accordance with the requirements of the ESA, the National Environmental Policy Act, and any other applicable statutes and regulations.

V. Party Giving Notice of Intent to Sue.

The full name, address, and telephone number of the party giving notice is:

Wild Fish Conservancy
P.O. Box 402
Duvall, WA 98019
Tel: (425) 788-1167

VI. Attorney Representing Wild Fish Conservancy.

The attorney representing Wild Fish Conservancy in this matter is:

Brian A. Knutsen
Kampmeier & Knutsen, PLLC
1300 S.E. Stark Street, Suite 202
Portland, Oregon 97214
Tel: (503) 841-6515
Email: brian@kampmeierknutsen.com

VII. Conclusion.

This letter provides notice under section 11(g) of the ESA, 16 U.S.C. § 1540(g), of Wild Fish Conservancy's intent to sue WDFW for violations of the ESA discussed herein. Unless the ongoing and imminent violations described herein are fully corrected within sixty days, Wild Fish Conservancy intends to file suit against WDFW to enforce the ESA. Wild Fish Conservancy is available during the sixty-day notice period to discuss effective remedies and actions that will assure future compliance with the ESA.

Very truly yours,

Kampmeier & Knutsen PLLC

By: _____
Brian A. Knutsen

CERTIFICATE OF SERVICE

I, Brian A. Knutsen, declare under penalty of perjury of the laws of the United States that I am counsel for Wild Fish Conservancy and that on December 2, 2020, I caused copies of the foregoing to be served on the following by depositing them with the U.S. Postal Service, postage prepaid, via certified mail, return receipt requested:

Director Kelly Susewind
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Commission Chair Larry Carpenter
Commission Vice Chair Barbara Baker
Commissioner James Anderson
Commissioner David Graybill
Commissioner Robert Kehoe
Commissioner Molly Linville
Commissioner Donald McIsaac
Commissioner Bradley Smith
Commissioner Kim Thorburn
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U.S. Fish & Wildlife Service
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Brian A. Knutsen

ATTACHMENT

HGMP Submission Legend

ESA Permitting Complete
Currently In Consultation
Not ESA Listed
Not Submitted
Pre-Consultation
Under Co-Manager Review

Appendix 3. Status and Schedule for Completion of Hatchery Genetic Management Plans for Washington State Hatcheries Applicable to revised Policy.

Status and Schedule for Completion of Hatchery Genetic Management Plans for Washington State Hatcheries

Region	Program/Facility	Species	Run	Consultation Status
1	Lyons Ferry	Chinook	Fall	Complete
1	Lyons Ferry - Wallowa Stock	Steelhead	Summer	Complete
1	Lyons Ferry - Wallowa Stock - On-Station	Steelhead	Summer	Complete
1	Lyons Ferry/Dayton Pond - Wallowa Stock	Steelhead	Summer	Complete
1	Tocuhet Spring Chinook	Chinook	Spring	Complete
1	Touchet Endemic (Wild Brood Program)	Steelhead	Summer	Complete
1	Tucannon	Chinook	Spring	Complete
1	Tucannon	Steelhead	Summer	Complete
1	Wallowa/Cottonwood Creek	Steelhead	Summer	Complete
2	Carlton Pond - MEOK	Chinook	Summer	Complete
2	Chiwawa	Chinook	Spring	Complete
2	Dryden Pond	Chinook	Summer	Complete
2	Methow	Chinook	Spring	Complete
2	Methow - Chewuch Acclimation Ponds	Chinook	Spring	Complete
2	Methow - Wells	Steelhead	Summer	Complete
2	Nason Creek	Chinook	Spring	Complete
2	Twisp	Steelhead	Summer	Complete
2	Twisp	Chinook	Spring	Complete
2	Wells - Chelan River Releases	Chinook	Summer	Complete
2	Wells - Mainstem releases	Chinook	Summer	Complete
2	Wenatchee - Chiwawa	Steelhead	Summer	Complete
3	Priest Rapids URB	Chinook	Fall	Complete
3	Ringold Springs - Wells stock	Steelhead	Summer	Complete
3	Ringold Springs Coho	Coho	Type-N	Complete
3	Ringold Springs URB	Chinook	Fall	Complete
4	Green River	Steelhead	Late Winter	Complete
4	Kendall Creek	Steelhead	Winter	Complete
4	Skykomish	Steelhead	Winter	Complete
4	Soos Creek	Steelhead	Summer	Complete
4	Soos Creek (& TU Des Moines Net Pen Co-op)	Coho	NA	Complete
4	Soos Creek - Marine Tech Lab (Ed Co-op)	Coho	NA	Complete
4	Soos Creek/Icy Creek	Chinook	Fall	Complete
4	Tokul	Steelhead	Winter	Complete
4	Wallace River	Chinook	Summer	Complete
4	Wallace River	Coho	NA	Complete
4	Wallace River - (Everett SSC (see Mukilteo) Net Pen (Co-op)	Coho	NA	Complete
4	Whitehorse Pond	Steelhead	Winter	Complete
5	Beaver Creek	Steelhead	Summer	Complete
5	Beaver Creek	Steelhead	Winter	Complete
5	Cathlamet Channel Net Pens	Chinook	Spring	Complete
5	Coweeman Ponds (Co-op)	Steelhead	Winter	Complete
5	Deep River Net Pen	Coho	Type-N	Complete
5	Elochoman River	Coho	Type-N	Complete
5	Grays River	Coho	Type-N	Complete
5	Kalama Falls	Chinook	Fall	Complete
5	Kalama Falls	Chinook	Spring	Complete
5	Kalama Falls	Coho	Type-N	Complete
5	Kalama Falls	Steelhead	Winter	Complete
5	Kalama Falls	Steelhead	Summer	Complete
5	Kalama Falls	Steelhead	WL	Complete
5	NF Toutle Hatchery	Chinook	Fall	Complete
5	NF Toutle Hatchery	Coho	Type-S	Complete
5	Salmon Creek (Klineline Pond)	Steelhead	Winter	Complete
5	SF Toutle (Coop)	Steelhead	Summer	Complete
5	Skamania - Rock Cr outplant	Steelhead	Winter	Complete
5	Skamania -onstation	Steelhead	Summer	Complete
5	Skamania -onstation	Steelhead	Winter	Complete
5	Washougal	Chinook	Fall	Complete
5	Washougal	Coho	Type-N	Complete
6	Dungeness	Chinook	Spring	Complete
6	Dungeness	Coho	NA	Complete
6	Dungeness	Steelhead	Winter	Complete
6	Dungeness/Hurd Creek	Pink	NA	Complete
6	Elwha	Chinook	Fall	Complete
6	Hood Canal Wild Steelhead Supplementation-McKernan	Steelhead	Winter	Complete
6	Hoodspout	Chinook	Fall	Complete
6	Hoodspout	Chum	Fall	Complete

HGMP Submission Legend

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6	Hoodspport	Pink	NA	Complete
4	Baker Lake	Coho	NA	In Consultation
4	Baker Lake	Sockeye	NA	In Consultation
4	Cedar River	Sockeye	NA	In Consultation
4	Issaquah	Chinook	Fall	In Consultation
4	Issaquah	Coho	NA	In Consultation
4	Marblemount	Chinook	Fall	In Consultation
4	Marblemount	Chinook	Spring	In Consultation
4	Marblemount	Chinook	Summer	In Consultation
4	Marblemount	Coho	NA	In Consultation
4	Marblemount Chum	Chum	NA	In Consultation
4	Reiter Ponds	Steelhead	Summer	In Consultation
4	UW Portage Bay	Chinook	Fall	In Consultation
4	UW Portage Bay	Coho	Fall	In Consultation
4	Wallace River	Chum	Fall	In Consultation
6	Bingham Creek	Chinook	Fall	Non-ESA Listed
6	Bingham Creek	chum	Fall	Non-ESA Listed
6	Bingham Creek	Coho	Fall	Non-ESA Listed
6	Bingham Creek	Coho	Late Winter	Non-ESA Listed
6	Bingham Creek	Steelhead	Winter	Non-ESA Listed
6	Bogachiel	Steelhead	Summer	Non-ESA Listed
6	Bogachiel	Steelhead	Winter	Non-ESA Listed
6	Bogachiel	Steelhead	Early winter	Non-ESA Listed
6	Forks Creek	Chinook	Fall	Non-ESA Listed
6	Forks Creek	Chinook	spring	Non-ESA Listed
6	Forks Creek	Chum	Fall	Non-ESA Listed
6	Forks Creek	Coho	Fall	Non-ESA Listed
6	Forks Creek	Coho	Late Winter	Non-ESA Listed
6	Forks Creek	Steelhead	Early winter	Non-ESA Listed
6	Humtulpis	Chinook	Fall	Non-ESA Listed
6	Humtulpis	Coho	Fall	Non-ESA Listed
6	Humtulpis	Coho	Late Winter	Non-ESA Listed
6	Humtulpis	Steelhead	Summer	Non-ESA Listed
6	Humtulpis	Steelhead	Early winter	Non-ESA Listed
6	Lk Aberdeen	Chinook	Fall	Non-ESA Listed
6	Lk Aberdeen	Coho	Fall	Non-ESA Listed
6	Lk Aberdeen	Steelhead	Winter	Non-ESA Listed
6	Lk Aberdeen	Steelhead	Summer	Non-ESA Listed
6	Mayr Brothers	Chinook	Fall	Non-ESA Listed
6	Mayr Brothers	chum	Fall	Non-ESA Listed
6	Mayr Brothers	Coho	Fall	Non-ESA Listed
6	Naselle	Chinook	Fall	Non-ESA Listed
6	Naselle	chum	Fall	Non-ESA Listed
6	Naselle	Coho	Fall	Non-ESA Listed
6	Naselle	Coho	Late Winter	Non-ESA Listed
6	Naselle	Steelhead	Early winter	Non-ESA Listed
6	Nemah	Chinook	Fall	Non-ESA Listed
6	Nemah	chum	Fall	Non-ESA Listed
6	Satsop Springs	Chinook	Fall	Non-ESA Listed
6	Satsop Springs	chum	Fall	Non-ESA Listed
6	Satsop Springs	Coho	Fall	Non-ESA Listed
6	Satsop Springs	Coho	Late Winter	Non-ESA Listed
6	Satsop Springs	Steelhead	Winter	Non-ESA Listed
6	Skookumchuck	Chum	Fall	Non-ESA Listed
6	Skookumchuck	Coho	Fall	Non-ESA Listed
6	Skookumchuck	Coho	Late Winter	Non-ESA Listed
6	Skookumchuck	Steelhead	Winter	Non-ESA Listed
6	Sol duc	Chinook	Summer	Non-ESA Listed
6	Sol duc	Coho	Summer	Non-ESA Listed
6	Sol duc	Coho	Fall	Non-ESA Listed
4	Kendall Creek	Coho	NA	Not Submitted
4	Whatcom Creek	Chinook	Fall	Not Submitted
5	Deep River Net Pen (SAFE)	Coho	Type-N	Not Submitted
5	Grays River	Chum	Fall	Not Submitted
5	Washougal (Duncan Creek)	Chum	Fall	Not Submitted
6	Deschutes (Squaxin Is) Tumwater Falls	Coho	NA	Not Submitted
5	Cowlitz	Chinook	Spring	Pre Consultation
5	Cowlitz	Coho	Type-N	Pre Consultation
5	Cowlitz	Cutthroat	Sea-Run	Pre Consultation

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Not Submitted
Pre-Consultation
Under Co-Manager Review

Appendix 3. Status and Schedule for Completion of Hatchery Genetic Management Plans for Washington State Hatcheries Applicable to revised Policy.

Status and Schedule for Completion of Hatchery Genetic Management Plans for Washington State Hatcheries

5	Cowlitz	Steelhead	Summer	Pre Consultation
5	Cowlitz (lower + Mayfield NP)	Chinook	Fall	Pre Consultation
5	Cowlitz (lower Cowlitz/upper Cowlitz/Tilton)	Steelhead	WL	Pre Consultation
5	Lewis River	Coho	Type-N	Pre Consultation
5	Lewis River	Coho	Type-S	Pre Consultation
5	Lewis River (I-205 wild)	Chum	Fall	Pre Consultation
5	Lewis River (Speelyai)	Chinook	Spring	Pre Consultation
5	Merwin	Steelhead	Summer	Pre Consultation
5	Merwin	Steelhead	Winter	Pre Consultation
5	Merwin (Lewis)	Steelhead	WL	Pre Consultation
6	George Adams	Chinook	Fall	Pre Consultation
6	George Adams	Coho	NA	Pre Consultation
6	McKernan	Chum	Fall	Pre Consultation
4	Glenwood Springs (LLTK)	Chinook	Fall	Under Co-Manager Review
4	Kendall (Nooksack) Chum - integrated	Chum	Fall	Under Co-Manager Review
4	Kendall Creek (NF Nooksack)	Chinook	Spring	Under Co-Manager Review
4	Samish	Chinook	Fall	Under Co-Manager Review
4	Whatcom Creek	Pink	NA	Under Co-Manager Review
4	Whatcom Creek (Kendall Cr)	Chum	Fall	Under Co-Manager Review
6	Chambers Creek	Chinook	Fall	Under Co-Manager Review
6	Hupp Springs	Chinook	Spring	Under Co-Manager Review
6	Minter Creek	Chum	Fall	Under Co-Manager Review
6	Minter Creek	Coho	NA	Under Co-Manager Review
6	Minter Creek/Hupp Springs	Chinook	Fall	Under Co-Manager Review
6	South Sound Net Pens	Chinook	Fall	Under Co-Manager Review
6	South Sound Net Pens	Coho	NA	Under Co-Manager Review
6	Tumwater Falls	Chinook	Fall	Under Co-Manager Review
6	Voights Creek	Chinook	Fall	Under Co-Manager Review
6	Voights Creek	Coho	NA	Under Co-Manager Review