

A Letter to Washington State Governor Jay Inslee  
In Regards to Defending Science-Based Salmon Recovery Policy

Governor Jay Inslee  
Office of the Governor  
PO Box 40002  
Olympia, WA 98504-0002

Dear Governor Inslee,

We, the undersigned fishery and environmental scientists, are writing to let you know of our deep concerns regarding the June 15, 2018 decision by the Washington State Department of Fish and Wildlife Commission (FWC) to suspend key policy guidelines of their 2009 Hatchery and Fishery Reform Policy (POL-C3619), while it undergoes a 6-12-month review. (A copy of the policy is attached).

The reason the FWC adopted the Hatchery Reform Policy in 2009 was “to advance the conservation and recovery of wild salmon and steelhead by promoting and guiding the implementation of hatchery reform.” The Policy’s stated intent was to improve hatchery effectiveness, ensure compatibility between hatchery production and salmon recovery and rebuilding programs, and support sustainable fisheries.

It is important, here, to point out that shortly after the Endangered Species Act (ESA) listing of Puget Sound Chinook salmon in 1998, Congress recognized that hatchery fish spawning with wild fish significantly reduced the genetic fitness of wild fish. They also recognized that hatchery fish comprised most of the commercial, tribal and recreational harvest. To address this obvious conflict between the need to maintain fishing opportunity and at the same time meet the ESA requirement to protect and recover wild fish, Congress with support from Governor Gary Locke established and funded a group of independent scientists in 2000, the Hatchery Scientific Review Group (HSRG). The HSRG was charged with reviewing the hatchery management practices of state, federal and tribal hatcheries, and making recommendations to Congress on how to manage hatcheries consistent with the requirements of the ESA and recovery of wild salmon and steelhead populations. The HSRG submitted its report, “Hatchery Reform”, to Congress in 2004. A similar report for Columbia River hatcheries was submitted to Congress in 2009.

In 2011, the National Marine Fisheries Service (NMFS) 4(d) rule for salmon and steelhead formally recognized the importance of the HSRG’s Hatchery Reform Report by noting that “NMFS considers the HSRG’s principles, findings, and recommendations important to the advancement and implementation of measures needed to reduce risk of adverse hatchery related effects to natural-origin salmon and steelhead populations.” As you know, just recently the HSRG has worked successfully with the Lummi, Upper Skagit and Tulalip Tribes to develop scientifically credible Hatchery Genetic Management Plans that respect their Treaty Rights and produce hatchery salmon for harvest.

Even the federal courts have ruled that hatchery fish on the spawning grounds undermine the recovery of wild fish and cannot be counted toward recovery of ESA listed populations. The State of Washington has already lost a lawsuit concerning the management of hatchery steelhead because they ignored this fact. So, we do not understand why the FWC suddenly without a full public review, decided to ignore the best available science and not utilize independent scientists, the HSRG, to ensure that the state’s hatcheries are

managed consistent with the needs of wild fish. It is not only a dangerous precedent regarding the management of our state's fish and wildlife, it is as short sighted as ignoring the science of climate change. As with climate change, the overwhelming body of science confirms the need to protect wild salmon on the spawning grounds.

We would urge you to personally review the recent action by the Fish and Wildlife Commission to suspend the principles, standards and recommendations of the HSRG. We would call upon you to take two immediate steps. First, we would urge you to call upon the FWC to immediately reinstate the three key policy guidelines while conducting the Hatchery and Fishery Reform Policy review. Second, the actions of the FWC to suspend the guidelines while conducting the review gives the appearance of an inherent bias against the HSRG. Therefore, we would call upon you to put together a true independent process to review the HSRG recommended principles, standards and recommendations.

Unfortunately, the FWC's actions have created significant division at a time we can least afford it. We, like you, believe strongly that following the best available science and the use of independent science can bring people together for the common purpose of restoring our salmon runs and Orca Whale populations.

Sincerely,

<b>Name</b>	<b>Title</b>	<b>Affiliation</b>
Andrew Kinziger, PhD	Professor	Humboldt State University, Department of Fisheries Biology
Anne Shaffer, PhD	Executive Director	Coastal Watershed Institute
C I Goddard, Ph.D.	Executive Secretary	Great Lakes Fishery Commission, AFS Fellow, Retired
Christopher Frissell, Ph.D.	Principal Scientist	Frissell & Raven Hydrobiological and Landscape Sciences
Conrad Mahnken, Ph.D.	Former WDFW Commissioner	WDFW, NOAA-Fisheries, Retired
David Montgomery, PhD	Professor of Geomorphology	Department of Earth & Space Sciences, UW
Gene Helfman, PhD	Professor Emeritus	Odum School of Ecology, University of Georgia
Jack Stanford, PhD	Professor Emeritus	Flathead Lake Biological Station
Julian Olden, PhD	Professor, SAFS	University of Washington
Ken Leber, Ph.D.	Founder	Science Consortium for Ocean Replenishment
Lance Morgan, PhD	President	Marine Conservation Institute
Lars Mobrand, Ph.D.	Past Chair of HSRG	HSRG, Retired

Matthew Sloat, PhD	Director of Science	Wild Salmon Center
Michael Blouin, PhD	Professor, Department of Integrative Biology	Oregon State University
Nick Gayeski, PhD	Aquatic Ecologist	Wild Fish Conservancy
Patrick Trotter, Ph.D.	Fishery Science Consultant	Retired
Peter Paquet, Ph.D.	Northwest Power and Conservation Council	Retired
Richard Williams PhD	Fisheries Ecologist and Research Associate	Department of Biology at The College of Idaho
Robert J Naiman, PhD	Professor Emeritus	School of Aquatic & Fishery Sciences, UW
Stephen Conroy, PhD	Senior Ecologist	King County Department of Transportation
Aaron Hill	Executive Director	Watershed Watch Salmon Society
Aaron Jorgeson	Biologist	Wild Fish Conservancy
Adam Brandt	Board of Directors, Secretary	Washington Water Trails Association
Adrian Tuohy	Biologist	Wild Fish Conservancy
Aileen Jeffries	Senior Research Scientist	Harbor Porpoise Project, Biota Maxima
Alan Levine	Director	Coast Action Group
Alexandra Morton	Founder	Raincoast Conservation Society
Amy Carey	Executive Director	Sound Action
Andree Hurley	President and Acting Executive Director	Washington Water Trails
Andy Appleby	Hatchery Biologist	WDFW, Retired
Ann E Prezyna	Counsel	Lane Powell
Chuck Owens	President	Peninsula Citizens for the Protection of Whales
Colleen Weiler, MSc	Jessica Rekos Fellow for Orca Conservation	Whale and Dolphin Conservation
Dave Seiler	Research Scientist	WDFW, Retired

Doug Hennick	Aquatic Ecologist	Wild Fish Conservancy
Emma Helverson	Outreach Coordinator	Wild Fish Conservancy
Frank Haw	Director	Washington Department of Fisheries, Retired
Grace Stiller	President and Founder	Nature Stewards Program
Jamie Glasgow	Director of Ecology	Wild Fish Conservancy
Jessica Helsley	Executive Director	Coast Salmon Foundation, Coast Salmon Partnership
Jim Lichatowich	Fishery Biologist and Author	Retired
Jim Martin	Chief of Fisheries	ODFW, Salmon Advisor to Governor Kitzhaber, Retired
John Barr	Chief Enhancement Biologist	Nisqually Tribe, HSRG, Retired
John Brosnan	Executive Director	Seattle Audubon Society
John C. McGlenn	President	Washington Wildlife Federation
John Kober	Executive Director	Pacific Rivers
John Sneva	Biologist	WDFW
Johnny Le Coq	Founder and CEO	Fishpond
Juan Carlos Cardenas N.	Executive Director, Veterinary Doctor	Centro Ecoceanos, Santiago de Chile
Justin Eastman	Biologist	Wild Fish Conservancy
Karen G. Wristen	Executive Director	Living Oceans Society
Kurt Beardslee	Executive Director	Wild Fish Conservancy
Lee Blankenship	Senior Research Scientist	WDFW, Retired
Lorna Smith	Vice-President	Olympic Forest Coalition
Maradel K. Gale	Executive Director	Bainbridge Beach Naturalists
Marcie Keever	Director, Oceans & Vessels Program	Friends of the Earth
Maria Meyer	Community Outreach Administrator	Central Co-op

Mark Greenwood	Secretary	Kitsap-Olympic Peninsula Chapter #383 of Trout Unlimited
Mark Sherwood	Executive Director	Native Fish Society
Mary Lou White	Field Biologist	Wild Fish Conservancy
Megan Adams	Biologist	Raincoast Conservation Foundation
Micah Wait	Director of Conservation	Wild Fish Conservancy
Misty MacDuffee	Wild Salmon Program Director	Raincoast Conservation Foundation
Noah Greenwald	Endangered Species Director	Center for Biological Diversity
Patrick Hanratty	Biologist	WDFW, Retired
Patrick Myers	Director of Outreach and Development	Wild Fish Conservancy
Paul Richard Dorn	Retired Senior Research Scientist	Suquamish Tribe, 1977 – 2017
Paul Seidel	Regional Hatchery Division Manager	WDFW, Retired
Peter Bahls	Fish Biologist and Director	Northwest Watershed Institute
Shari Tarantino	Executive Director	Orca Conservancy
Stan Moberly	President	American Fisheries Society, Retired
Steve Erickson	Executive Director	Whidbey Environmental Action Network
Steve Manlow	Executive Director	Lower Columbia Fish Recovery Board
Susan Ballinger	Founder and Lead	Wenatchee Naturalist Program
Tom Flagg	Supervisory Fisheries Research Biologist	NOAA-Fisheries, Retired
Whitney Neugebauer	Executive Director	Whale Scout

## Fish and Wildlife Commission

### Commission Policy Documents

[<< Commission Policy Documents Index](#)

#### POLICY DECISION

**POLICY TITLE:** Hatchery and Fishery Reform

Supersedes: N/A

See Also:

**POLICY NUMBER:**

Effective Date

Termination Date

Approved by:

POL-C3619

November 6, 2009

Not applicable

/s/ Miranda Wecker  
Fish and Wildlife Commission Chair

**DOWNLOAD:** [Signed copy of POL-C3619 \(PDF\)](#)

#### Purpose

The purpose of this Washington Department of Fish and Wildlife policy is to advance the conservation and recovery of wild salmon and steelhead by promoting and guiding the implementation of hatchery reform.

#### Definition and Intent

Hatchery reform is the scientific and systematic redesign of hatchery programs to help recover wild salmon and steelhead and support sustainable fisheries. The intent of hatchery reform is to improve hatchery effectiveness, ensure compatibility between hatchery production and salmon recovery plans and rebuilding programs, and support sustainable fisheries.

#### General Policy Statement

The Washington Department of Fish and Wildlife (Department) shall promote the conservation and recovery of wild salmon and steelhead and provide fishery-related benefits by establishing clear goals for each state hatchery, conducting scientifically defensible-operations, and using informed decision making to improve management. Furthermore, it is recognized that many state operated hatcheries are subject to provisions under U.S. v. Washington and U.S. v. Oregon and that hatchery reform actions must be done in close coordination with tribal co-managers.

Artificial production programs will be designated as one of the following:

- Conservation Programs. Artificial production programs implemented with a conservation objective shall have a net aggregate benefit for the diversity, spatial structure, productivity, and abundance of the target wild population.
- Harvest Programs. Artificial production programs implemented to enhance harvest opportunities shall provide fishery benefits while allowing watershed-specific goals for the diversity, spatial structure, productivity, and abundance of wild populations to be met.

State commercial and recreational fisheries will need to increasingly focus on the harvest of abundant hatchery fish. As a general policy, the Department shall implement mark-selective salmon and steelhead fisheries, unless the wild populations substantially affected by the fishery are meeting spawner and broodstock management objectives.

In addition, the Department may consider other management approaches provided they are as or more effective than a mark selective fishery in achieving spawner and broodstock management objectives.

Hatchery reform should be implemented as part of an "all-H" strategy that integrates hatchery, harvest, and habitat actions. Although this policy focuses on hatchery and harvest reform, in no way does it diminish the significance of habitat protection and restoration.

In implementing the policy guidelines the Department shall work with the tribes in a manner that is consistent with *U.S. v. Washington* and *U.S. v. Oregon* and other applicable state laws and agreements or federal laws and agreements.

#### Policy Guidelines

1. Use the principles, standards, and recommendations of the Hatchery Scientific Review Group (HSRG) to guide the management of hatcheries operated by the Department. In particular, promote the achievement of hatchery goals through adaptive management based on a structured monitoring, evaluation, and research program.
2. The Department will prioritize and implement improved broodstock management (including selective removal of hatchery fish) to reduce the genetic and ecological impacts of hatchery fish and improve the fitness and viability of natural production working toward a goal of achieving the HSRG broodstock standards for 100% of the hatchery programs by 2015.
3. Develop watershed-specific action plans that systematically implement hatchery reform as part of a comprehensive, integrated (All-H) strategy for meeting conservation and harvest goals at the watershed and Evolutionarily Significant Unit (ESU)/Distinct Population Segment (DPS) levels. Action Plans will include development of stock (watershed) specific population designations and application of HSRG broodstock management standards. In addition, plans will include a time-line for implementation, strategies for funding, estimated costs including updates to cost figures each biennium.
4. Externally mark all Chinook, coho and steelhead artificial production that is intended to be used for harvest except as modified by state-tribal agreements or for conservation or research needs.
5. Secure necessary funding to ensure that Department-operated hatchery facilities comply with environmental regulations for passage facilities, water intake screening, and pollutant control systems.
6. Implement hatchery reform actions on a schedule that meets or exceeds the benchmarks identified in the 21st Century Salmon and Steelhead Framework.
7. Provide an annual report to the Fish and Wildlife Commission on progress of implementation.
8. Develop, promote and implement alternative fishing gear to maximize catch of hatchery-origin fish with minimal mortality to native salmon and steelhead.
9. Seek funding from all potential sources to implement hatchery reform and selective fisheries.
10. Define "full implementation" of state-managed mark selective recreational and commercial fisheries and develop an implementation schedule.
11. Work with tribal co-managers to establish network of Wild Salmonid Management Zones (WSMZ)<sup>1</sup> across the state where wild stocks are largely protected from the effects of same species hatchery programs. The Department will have a goal of establishing at least one WSMZ for each species in each major population group (bio-geographical region, strata) in each ESU/DPS. Each stock selected for inclusion in the WSMZ must be sufficiently abundant and productive to be self-sustaining in the future. Fisheries can be conducted in WSMZ if wild stock management objectives are met as well as any necessary federal ESA determinations are received.