

Hatchery and Fishery Reform Policy

C-3619

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Overview of Briefing

- **Policy C-3619 Review**
 - **Anadromous Salmon and Steelhead Hatchery Policy Draft**
- **Overview of Public Comment**
- **Next Steps**



Policy C-3619 Review

- **Thorough Review of the Hatchery and Fishery Reform Policy**
 - **Science and Implementation**

- **Anadromous Salmon and Steelhead Hatchery Policy Draft**
 - **Process Modification Approved at the September meeting**
 - **Hatchery Policy Writing Group Provided Edits for Consideration**



Public Comments Received in August on C-3619

- Concerned with genetic/ecological impacts
- Selective gear
- Does not address All-H goals
- Not using best available science
- Increase performance reporting
- Does not address climate change
- "Balancing" has historically led to decline
- NMFS-approved HGMP does not provide adequate guidance
- Not in line with DFW mandate
- Decreased opportunity and returns
- Prioritize replacing lost salmon habitat
- Increased predation
- Concerned with salmon/orca management
- Stability of commercial fleets
- Raise more fish
- Local economies
- Economic stability
- Extend comment period
- Lacks focus on wild fish



Public Comments Received September 14th through October 12th 2020 on C-3619

- Increase production of salmon and steelhead
- Open more hatcheries and reopen hatcheries that have been closed
- Decreased harvest opportunity and returns
- Results of previous policy are unclear
- Utilize more wild fish for brood stock
- Policy is “junk science”
- Concern about impact of dams
- Increased predation by pinnipeds
- Policy needs to be in alignment with the Statewide Salmon Recovery Strategy
- Lacks a direct policy commitment to aligning hatchery production with state and federally adopted recovery plans and rebuilding programs
- Encourage FWC to engage with Regional Salmon Recovery Organizations
- Revised policy mandates completion of HGMPs, removing internal accountability
- Policy creates a disconnect between hatchery management and fish science within the Department



Public Comments Received September 14th through October 12th 2020 on C-3619

- Policy should include the need for creating Statewide Hatchery Monitoring and Evaluation Plan
- Policy ignores WDFW science and implementation reviews
- Opens the door even wider on unsustainable increases in hatchery production
- WDFW should withdraw the DNS and complete an EIS
- Too many supplemental hatcheries, not enough resources to meet goals
- Data collected (CWT recaptures, pHOS, pNOB, etc.) are not analyzed and used



Public Comments Received after October 12th Meeting on C-3619

- Hatchery production puts fish where they are no longer available under conservation mandates if taken by high mortality nets
- The "schedule" in the draft Hatchery Policy is not really a schedule
- Adding a 'pandemic context' component to these ongoing policy revisions is essential (ex. the constituency of recreational fishers will proportionately increase over their commercial counterparts)
- This review is short sighted and misguided
- Current policy does not require the use of best available science to make adaptive changes
- WDFW should focus on scientific based redesign of hatchery program
- Current policy contradicts scientific research by WDFW
- Expanding hatchery production does not address the underlying root cause of the problem of declining populations
- Wild salmon must be protected from interbreeding with hatchery fish



Public Comments Received after November 6th Meeting on C-3619

- Wild salmon must be protected from interbreeding with hatchery fish
- Draft policy creates a new policy that is less restrictive from a biological, scientific and environmental perspective
- Draft policy as it exists is loosening up everything so that the policy is not being driven by prescriptive science by not having measurable outcomes
- Suspension of HSRG criteria contributes to a lack of specificity
- Policy is blatant abandonment of science; completely ignoring the WA Academy of Science report and disregarding growing concerns of staff
- Policy needs clearly defined goals with standards that can be measured as well as a plan to actually measure progress or lack thereof
- Policy is less prescriptive...this subsequently reduces any environmental benefit of the policy
- Policy is a stark departure from the original policy intent to recover wild fish
- Policy has shifted to a value-based approach to “improve hatchery effectiveness”
- Does not require WDFW to use best available science; contradicts WDFW’s own science



Public Comments Received after November 6th Meeting on C-3619

- Policy is shortsighted and fails to consider that recovering wild populations is the best way to ensure long-term ecosystem health and harvest opportunity for the region's fishing industry and Tribal Nations
- More people means more hatcheries
- Open up all hatcheries at 100% capacity
- Cull/reduce the populations of the seals and cormorants that decimate the returning Chinook to the rivers and the smolts to the oceans
- Reconsider the use of gill nets that are being implemented as well
- Use of the word 'guideline' as it refers to the procedural aspects of the policy...the word 'guideline' is meant to be interpretive and discretionary. However, the overarching language contained in this policy does not communicate to me that WDFW folks/constituencies will have much/any discretion in how this policy is operationalized. Therefore, recommend that the word 'guideline' be replaced with the word, 'procedure(s)'.
- Predation must be acceptably reduced and gillnets, as a capture tool, prohibited



Public Comments Received after November 6th Meeting on C-3619

- **Culturing practices need substantial reform (i.e. milt to egg ratios must never exceed natural spawning ratios)**
- **Hatchery environment must mimic streams**
- **Too much hatchery and too little wild**
- **Disagree that wild stocks of certain DNA are the only key to guaranteeing numbers of returning spawning fish**
- **Comeback is based on biological data supplementing only with wild stock and would most likely only occur with no Recreational, Tribal, or Commercial fishing allowed**
- **If hatchery reform c-3619 has more leniency towards hatchery to become naturally wild, [they] are in favor [of the policy]**
- **Draft document appears to be a major step backward from the 2009 version**
- **Emphasis has been changed from one of conservation to balancing conservation with other societal benefits**
- **The document states that programs will be based on best available science...but makes no mention as to how this science will be developed**
- **Lack of accountability in the policy**



Public Comments Received after November 6th Meeting on C-3619

- Policy needs to be approved now and move forward
- Support this policy and what is right for our fisheries
- Endorse the revised policy C-3619
- Policy is based on errant belief that hatcheries are a problem...hatcheries are a symptom of several more serious problems that need to be addressed to achieve full recovery of wild fish
- Hatchery production should maintain acceptable levels of abundance, strive to increase natural production, maintain long-term fitness of the target population
- Best available science should be used
- Programs should be conservation oriented and judged from a risk/benefits basis
- No HSRG
- Support increased hatchery output and the updated hatchery policy
- Support the revised WDFW Commission Policy C-3169. This action [policy] is long overdue.
- Please learn from British Columbia's research and action proving that there is more income/fish to the state (province) from sport fishing than commercial harvesting. Support Policy C-3619.



Public Comments Received after November 6th Meeting on C-3619

- Throughout, there is reference to “wild population” ...suggest that a definition that term should be documented [and] that the definition focus on the gene pool and DNA specific to that watershed and not on where the fry hatches from
- Underlying assumption of [“Policy Guidelines”] is that the stock of hatchery fish comes from parental brood stock not from that river system...encourage a consideration of using broodstock from the river system in question as parental stock for the hatchery production
- The hatchery focus should be on the entire river system, not just where the brick and mortar of the hatchery is established
- Support re-write of C-3619...the original policy in place for almost 11 years and no strong results to show for the recovery of our salmonid populations
- Need to become more aggressive in the utilization of our state hatchery facilities
- Policy change should be paused and subjected to a full Environmental Impact Statement (EIS) under the auspices of the SEPA process



Public Comments Received after November 6th Meeting on C-3619

- **100% behind the revised WDFW Commission Policy C-3619. It is obvious that what has been tried isn't working.**
- **Time to let go of the failing HSRG policy and move forward with producing more hatchery fish**
- **Current policy is not working...wholeheartedly support [the revised policy] in hopes that we will see an increase in these iconic species in our region**
- **Get real and take care of the fish**
- **The addition of the HSRG to the management process was clearly a mistake and has not produced any of the results that it promised. Please return management of our resources to the legal co-managers, The State of Washington and its citizens and the Native American Shareholders.**
- **Please do not mandate that the HSRG or any like minded body be involved in setting Salmon hatchery policy. The Tribes and WDFW have enough trained biologist to make informed scientific decisions.**



Public Comments Received after November 6th Meeting on C-3619

- Support the revisions of the Hatchery Policy C-3619. Please move this Policy forward and continue to work with our Co-Managers.
- Want to see the three HSRG points removed from the policy and do not want to revert back to the old policy
- If SEPA was never properly executed on the previous policy, this should have terminated the old policy
- Washington must produce more fish in our hatcheries to support not only the Orcas but our recreational fishing community
- Increase hatchery production is a win-win for the State and all who benefit from the resource
- Support C-3619 and the removal of the majority of the HSRG language so the state and the tribes can have more flexibility with their hatchery programs
- Need to increase hatchery production under new, enlightened practices
- C-3619 represents an important step toward achieving long-sought, long-term benefit to the resource, the broader ecosystem, and all economic and cultural stakeholders



Public Comments Received after November 6th Meeting on C-3619

- **Strongly encourage you to reconsider the shift in policy, uphold the intention as the original policy stated, and not abandon the science-based fishery and hatchery reform**
- **Concerns with the SEPA process for both the original policy's Determination of Non-Significance (DNS) and current draft policy DNS**
- **This is not BAS, but undercuts science to provide extra fish for harvest, without evaluating the consequences.**
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- **Draft policy continues to ignore and undermines the conclusions and recommendations from staff scientists, counters the breadth of science on hatchery effects, and unfortunately delivers a policy that is committed to increased hatchery production in an effort to bolster short-term commercial and recreational fishing opportunities, with little regard for the genetic and ecological impacts these programs might have to natural-origin populations.**
- **Hatcheries need proper evaluation...Hatcheries need evaluations of success...How will we know if we are succeeding?**





Public Comments Received after November 6th Meeting on C-3619

- We are all mindful of the need for continued scrutiny and reform of various departmental policies as circumstances change and believe the proposed reforms are well thought-out and necessary.
- Support/Endorse the revised WDFW Commission Policy C-3619 (304 comments received)



Next Steps?

