

Points for Discussion Regarding Co-manager Hatchery Policy

Co-management as part of our management vision

Co-management of salmon and steelhead hatcheries is a worthy objective. Cooperation and coordination among the Washington Department of Fish and Wildlife (WDFW), Fish and Wildlife Commission (FWC), and Tribal Nations on hatchery research, production, and management could substantially (a) promote recovery and conservation of at-risk salmon and steelhead populations and their ecosystems, (b) help meet the needs of Tribal Nations long connected to salmon and steelhead, and (c) support sustainable recreational and commercial fisheries.

Establishing such cooperation and coordination will be challenging because of the history and complexity of salmon/steelhead fisheries management; the associated cultural, fiscal, social, and environmental benefits and costs of management; the continued decline of many wild salmon and steelhead populations; ongoing debate about management priorities; the confounding effects of other important, related issues (e.g., Southern Resident Orcas (SRO)); and the varied threats from human population growth and climate change.

Information needed to support well-informed decisions

To make thoughtful, effective decisions about how to proceed on this matter, the FWC should be well informed about a range of topics including, but not limited to, the following.

Historical context

The FWC and WDFW need to understand past decisions made and actions taken, their utility, and how they affected the targeted fish populations; associated ecosystems; and Tribal, recreational, and commercial fisheries. That information should include a description of hatchery production over the past 50 years, the effects (positive and negative) of that production, and previous and current agencies, organizations, recovery plans, and hatchery management plans. All such information is necessary context for informed decision-making on hatchery-related policies. After decades of evolution, have management and scientific efforts been successful. If not, what have we learned that is relevant here?

Alternatives

To ensure effective decision-making, the FWC must be informed about the proposed policy as well as meaningful alternatives, including taking no action. Alternatives are important because a) the purpose of this policy may be achieved through different means, and b) different alternatives should help identify and resolve key issues/concerns underlying the policy. The FWC should make its decisions based on a full understanding of alternatives and their potential consequences.

Principles

This policy's utility will depend, in part, on the principles it espouses to guide its implementation. Those principles require further discussion are not yet clear and require further discussion. Among other things, they could include the following.

- *Recovery/conservation first* – The draft policy does not confirm that recovery/conservation of wild salmon and steelhead stocks is the primary objective guiding this policy. If that is the case, then the policy should state as much and, if it is not, then the policy should describe what will be given higher priority and how that higher priority is consistent with the FWC mandate.
- *Transparency* – Transparency is – or should be – a general condition for almost all management processes undertaken by the FWC and WDFW because they act on behalf of Washington citizens. Without such transparency, members of affected parties and the public may not fully understand the issues involved and have the opportunity to hold their decision-makers accountable. Would the work conducted under this policy be transparent. If not, why not?
- *Best available science* – The draft policy indicates that hatcheries will be designed and operated in a “scientifically sound and defensible” manner. This term should be defined. If it implies a step down from the “best available science,” then why is this necessary?
- *Monitoring and evaluation* -- The FWC should understand how all involved hatcheries will be monitored and evaluated. Seasonal assessment is important for tracking abundance and genetic objectives and interannual assessment is important for meeting recovery and conservation goals. Monitoring and evaluation are also critical for structured decision-making and adaptive management (described in the next bullet). My understanding is that a “Technical Procedures Document” is being prepared for this purpose and, if so, that document should help clarify how WDFW and co-managers will meet their monitoring and evaluation responsibilities.
- *Adaptive management and structured decision-making* – The draft policy would pertain to management challenges confounded by multiple sources of uncertainty. Although managers presumably will adjust as they learn about these uncertainties, that practice falls short of “adaptive management” in a formal sense. “Adaptive management” requires actively combining scientific methods and management strategies to ensure that critical uncertainties are resolved actively or directly, rather than passively. Similarly, structured decision-making requires pre-determination of actions that will follow future scientific or adaptive management results. Will adaptive management and structured decision-making be used under this policy?
- *Hatchery management plans (HMPs) and hatchery genetic management plans (HGMPs)* – HMPs and HGMPs have been identified as key management guides to be used depending on the level of concern regarding interbreeding of hatchery origin and wild salmon and steelhead. The draft policy should state how many of these HMPs and HGMPs are completed, how effective they have been, and whether co-managers would be required to continue their development and implementation under the proposed Co-management Hatchery Policy. They also should address the question of whether HGMPs are aimed at determining whether hatchery-related activities will cause jeopardy (under an Endangered Species Act section 7 consultation) or are aimed at recovery of the affected salmon/steelhead stocks – those two purposes are not the same.
- *C-3624 directives* – The draft policy states that hatchery plans consistent with this policy will supersede FWC policy C-3624. Although that statement is generally clear, its full implications are not, and the SEPA analysis should fully identify and describe them. Policy C-3624 has an effective date of 9 April 2021; hence, it is only two years old.

Benefits and risks

A complete analysis of the risks and benefits of accepting and implementing this policy is essential for informed decision-making. To be comprehensive, the description should include ecological,

cultural, social, and economic risks and benefits. Many public comments called for a thorough risk/benefit analysis, and the FWC also needs to understand those risks and benefits. To understand then, decision-makers must be informed about the probability and significance of each risk and benefit and, for risks, means of mitigating or avoiding them. Here, too, the analysis also should describe the risks and benefits of superseding policy C-3624.

Alignment and coordination

FWC's decision on the draft Co-management Hatchery Policy should depend, in part, on how the policy aligns with numerous other salmon and steelhead recovery and management efforts. Work done under the proposed policy could support or undermine the efforts being carried out by other offices (e.g., Governor's Salmon Recovery Office), boards (e.g., Lower Columbia River Fish Recovery Board), Councils, (e.g., North Pacific and Pacific Fishery Management Councils), departments (e.g., Ecology, Natural Resources), Tribes, and even another nation (i.e., Canada). Such work also could have important implications for other WDFW activities (e.g., habitat restoration).

The analysis should describe how the proposed policy aligns with the various existing recovery/management plans, including state and federal recovery plans and hatchery management plans, and with an all-H approach to management.

Southern resident orcas

The proposed Co-management Hatchery Policy may affect not just salmon and steelhead populations, but also other at-risk populations in the affected ecosystems. Recommendation 6 of the Southern Resident Killer Whale Recovery Task Force created by Governor Inslee was to "significantly increase hatchery production and programs to benefit Southern Resident orcas consistent with sustainable fisheries and stock management, available habitat, recovery plans, and the Endangered Species Act. Hatchery increases need to be done in concert with significantly increased habitat protection and restoration measures." This recommendation highlights the importance of evaluating the broader, ecosystem-level effects of the proposed policy and its potential to interact with other management directives.

Decision-making under a co-management agreement

FWC, WDFW, and Tribal Nations do not all share the same responsibilities and obligations, and it is not clear how the responsibilities of one party might be lawfully imposed on or delegated to the other. Similarly, it is not clear how disputes will be managed when proposed resolutions fall outside of, or are inconsistent with, the authorities of one of the parties. Addressing these uncertainties requires a more complete description of how the co-management process will actually work, or is envisioned to work.

Funding

The budgetary process for this co-management under this agreement also warrants a full description so that neither party enters into the agreement with fiscal expectations that may or may not be met. How will funding needs be addressed? How will funding needs for these co-management efforts be weighed against budgetary needs for other WDFW responsibilities? These are critical questions because hatcheries appear to be the largest single expense for WDFW and it is not clear how WDFW and the Tribes would share costs.