August 14, 2024

Washington State Department of Fish and Wildlife (WDFW)
Contact: Doug Wiedemeier
600 Capitol Way N
Olympia, WA 98501

Sent via website to WDFW and email to: SolDucWeirReplacement@PublicInput.com

Subject: Trout Unlimited comments on July 31, 2024 State Environmental Policy Act (SEPA) Determination of Nonsignificance (DNS) for 24-030: SOL DUC HATCHERY WEIR PERMANENT REPLACEMENT

Mr. Wiedermeier:

Trout Unlimited (TU) appreciates this opportunity to comment on the Washington Department of Fish and Wildlife's (WDFW) SEPA DNS for the Sol Duc Hatchery Weir Replacement.

With over 350,000 members and supporters – including 6,000 members in the state of Washington—and over 300 staff, TU is North America's largest nonprofit organization dedicated to the protection, conservation, and restoration of cold-water fish and their watersheds. Our strength is derived from our grassroots members and volunteers working together with our staff toward the common goal of ensuring resilient fish populations for future generations. TU is dedicated to using the best available science to guide our efforts, and we have the benefit of applying the expertise of our staff fisheries scientists to support policy and science efforts requiring careful analysis.

As an organization dedicated to conserving, protecting, and restoring North America's cold-water fisheries and their watersheds, with the Sol Duc River and Quillayute watershed as Priority Waters for us in Washington State, we offer the following comments for your consideration on your environmental analysis of the Sol Duc Hatchery Weir Replacement Plans.

Overall, it is our view that the SEPA checklist is insufficient in addressing how this replacement weir will impact migratory salmon and winter steelhead within the watershed. We understand this is a rebuild of the old weir but constructing a permanent structure in its place. Therefore, this is the critical period within the process when considerations for adaptive management and use of the best available science must be part of the plan's development and eventual rebuild.

Here are a few considerations that should be included in the plans moving forward:

- How will this project address migration delays associated with the low flow scenarios that are common in the river in late summer and early fall, specifically for natural-origin summer coho and summer chinook? Similarly, how will this project address migration delays of natural-origin winter steelhead during periods of low flows in the winter?
- Another issue to be addressed during periods of low flows is the potential for an increase in predation at the weir of salmon, steelhead, and resident trout. How is that being considered and addressed?
- The primary purpose of this weir is to capture hatchery origin salmon and reduce pHOS within the watershed. The WDFW study published in *North American Journal of Fisheries Management,* "Weirs: An effective tool to reduce hatchery–wild interactions on the spawning grounds" (2024 Wilson/Buehrens), concluded that using weirs to reduce hatchery-wild interactions on the spawning grounds was challenging and while the examples in the study did reduce pHOS, it did not do so at a level low enough to facilitate fit and viable wild populations. Continuing, the study does "highlight the need for adaptive management to realize the goals of the weirs, underscores the need for experimental design approaches, and identifies opportunities for future work," including improving the ability of weirs and associated management tactics to reduce pHOS. The same study also concluded that weirs can have unintended negative impacts on natural-spawning populations, including migration delay, changes in redd distribution, and declines in productivity. It is our opinion that these unintended consequences must be addressed during this rebuild, including the recommendation the study's authors made about adaptive management and improving the ability of weirs to reduce pHOS.
- The previous issues should have been addressed under checklist 5.d., in addition to assessing resident fish passage. The timeline described of building the weir, assessing resident fish passage, developing a future project, and then trying to secure the potential project funding at a future legislature is backward. Assessing the impacts to resident fish passage and then developing a solution, if necessary, must be completed before construction and integrated into the rebuild.

- Overall, the lack of details, along with the timeline in 5.d., is alarming and we hope our comments and recommendations provided from your published colleagues will help to address these concerns.

We appreciate your consideration for these comments and are happy to answer any questions you may have about our concerns.

Sincerely,

Jonathan Stumpf
Washington Advocate – Wild Steelhead Initiative
Trout Unlimited

Gary Marston
Science Advisor – Wild Steelhead Initiative
Trout Unlimited

References:

- Wilson, J. and T. Buehrens. 2024. Weirs: An effective tool to reduce hatchery–wild interactions on the spawning grounds? North American Journal of Fisheries Management. 2024; 44:21–38.