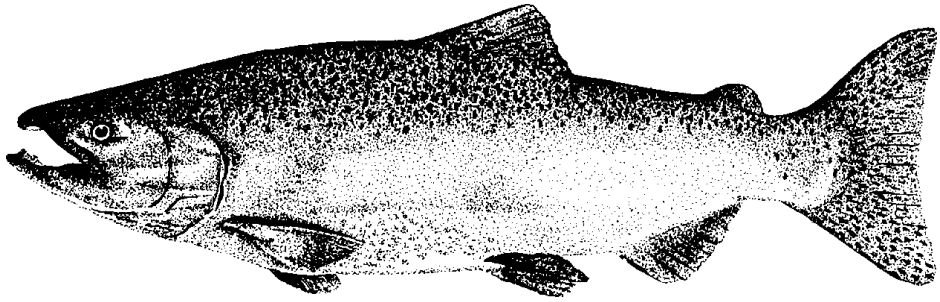
STATE OF WASHINGTON September 1997

Wild Salmonid Policy



Environmental Impact Statement

Appendix J

Appendix J PUBLIC COMMENTS

The following are responses to comments received from public meeting input and letters from the public, government agencies, and Tribes. The numbers after the comments correspond to the commentor's name list. The public meeting notes were also discussed during the breakout sessions.

These responses compliment the text of the FEIS. We incorporated much of the discussion of the input into the FEIS because we felt that the responses would be clearer and make more sense when in context with the other elements of the Wild Salmonid Policy.

Thirteen modifications to the DEIS Alternative 3 were made based on comments we received from the public, the Tribes, state and federal government staff, and the Fish and Wildlife Commission.

Table of Contents

Appendix J Public Comments

List of people who signed in and affiliations, if noted, who attended one or more of the 12 public meetings on the Wild Salmonid Policy DEIS during April and May 1997.

Richard Abbott
Al Adams, 4CSEO
Mike Adams, PSGA
Jason Adler
Randy Aho, WDFW
Henry Altenburg, Kitsap Poggie Club
Steve Alexander, Trout Unlimited
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Karl Anderson, SWWA
Richard E. Anderson, Kitsap Audubon
Robert Anderson, Mid-Sound FEG
Ted Anderson, WDFW
Jack Andis, M & R
Gina Andrews, Tree Farm
Mark Andrews, Tree Farm
Jerry Angiuli, Port Angeles Gun Club
Lori Craig Ashley, Landowner
Mark Ashley, Willapa Bay Gillnetters Association
Doug Atkinson, PCSC
John Azechavala, WFFC
Donald Bardvic, Landowner, Hylobois Ck
Jim Baker, Sierra Club
Randy Baisden
Donald Baldwin
Bruce Barbour, Department of Ecology
Brad Barnes, Clark-Skamania Fly Fishers
Emily Barnett, NWEA
Al Barr, Rayonier
Lonnie Barrett
Steve Barrowe-Meyer, Weyerhaueser
Joe Barton, Trout Unlimited
Marie L. Beam
Kurt Beardslee, Washington Trout
Dave Beatty, Skagit Fisheries Enhancement Group
Dave Becker, Friends of the Cowlitz
Tom & Cindy Beechinor, WA Cattlemen's Assoc.
Harry Bell
Claton Belmont, WDFW

W. H. Bennington
Harold Bergstrom, Grays Harbor Poggie Club
Peter Birch, WDFW
Dean Biss
Brian E. Blake, Grays Harbor Resident
Betsy Bloomfield
George Boggs, Whatcom Conservation District
Bill Bosch, Yakama Indian Nation-Fisheries
Mike Bouchard, Sportfisher
John Boulton
Craig Bowhay
Gordon D. Boyd
Tim Boyd, WFPA
Carol Sue Braaten-Aldrich
Bruce Briggs, FISH
Bob Brink, Clark County Farm Forestry Association/Tree Farmer
Ginny Broadhurst, Puget Sound Water Quality Action Team
Bob Brody, Chelan/Douglas County Farm B
Dave Brown, City of Yakima
Terry Bruegman, Columbia Conservation District
George Brulotte, LCFFA
Ray Brunson, USFWS
Craig Buchanan, WA Co. Wheat Growers
Jim Buck, 24th District-Legislature
Gene Bucksbaum
Ray Burhen, Forest Land Owner
Mary Burke, WA Cattleman's Assoc.
R. Robert Burns, North Forty Forests
Eldon Bussell
Tom Butler
Henry Butonschoer
Joe & Jane Camenzind, Willapa Water Quality
Allan Cameron
Thomas G. Campbell, Whidbey Audubon Society
Lanny Carpenter, PSGA
Ted Carpenter, Olympic Peninsula Fly Fishermen
Bruce Carmack
Jason Cass
Jim Cathcart, The Campbell Group
Frank Cerniwey, South Sound Fly Fishers
Lucy Cerqui, Farm Bureau
William Glenn Cherry, Jr.
Al Chudek

Gary Clark
Al Chapman
Marv Chastain, REAL
Gary L. Christensen, WA State Farm Bureau, L & G Christensen Farms
Kim Christensen
Larry Christainsen, Gillnetter
Scott Christensen, Fourth Corner Fly Fishers
Shirley & Gerald Christensen, SSORF
Chris Cheney, Washington State Dairy Federation
Al Chudek
Denny Church, Anacortes American Puget Sound Anglers, Fidalgo Fly Fishers
Joe J. Chvatal, Jr.
Don C. Collins, Vancouver Wildlife League
Rose Cook, WFFA
Virgil Cook, WFFA
Diane Cooper, Shellfish Growers
Ken Corey, Green Crow
Cheryl Cox
Dennis Creel, Hampton Resources, Inc.
Craig Crider, Farm Credit Services
Jay Cronk, WA Wheat Growers
Clay Crow
Jim Cummins, WDFW
Deborah Daebner-Millet, Wild Olympia Salmon
Lorin Daggett, Mountaineers
Wolf Dammers, WDFW
Charlotte Danforth, Lewis County Farm Forestry
L. C. Dawley, NOSC
Jim Deeney, Tri-State Steelheaders
Marylyn S. Denton, Tree Farmer-Lewis County
Duane Depping, Farm Credit Services
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Julie Dieu, Ph.D., Rayonier
Kent Dimmitt, WDFW
Tom Dorton, Kitsap Poggie Club
J. Dougherty
William & Doris Dragich, Farmers
Harold Drumstad, Landowner
Dave Duncan
Tom and Anita Dunhill
Art Dunker, Port Angeles Chamber of Commerce
Rick Dunning, CCFFA
Dan DuPaus, Landowner

Dick Easter, CCFFA
Jerrie Eaton, Tree Farm Owner
John H. Ehrenreich, Jr., WFPA
John Ehrenreich, Sr.
Bruce Elliott, Commercial Fisherman
Dwayne Ellis, NW Steelheaders
Stuart Ellis
Diane M. Ellison, For the Sake of the Salmon
Earl Emerson, Chehalis River Council
Rick Endicott, Long Live the Kings
Dick Erickson, E Columbia Basin Irrigation Dist.
Vinton Erickson, Clark County Farm Bureau
Matt Evich, Puget Sound Boat Independence
Mitch Evich, Skipper, Puget Sound Boat Independence
Kale Ewccett, YIN
Dean Farrens
Rick Feckins
Bruce M. Ferguson, Washington Council-Federation of Fly Fishers
Pete Fiahengo, Fisher
Polly Fischer, Skagit Enhancement Group
Don Fish, Vancouver Wildlife
Jim Flack
Frank Fletdig, Puget Sound Gillnetters Assoc.
Bernie Flores
Scott Fowler, Wildcat Steelhead Club
Gates Freereiel, Fisher
Ray Frederick, Kitsap Poggie Club
Craig French, G.C.
Clare Fogelson, NSEA
Karla Kay Fullerton, WA Cattlemen's Assoc.
Ron & Kay Gamaette, WA State Farm Bureau
Walt Gary
Daniel R. Gasper, Chelan/Douglas Farm Bureau
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John Geidl
F. K. Gerds, Clark-Skamania Fly Fishers
John C. Giovanini
Dick Goin
John Gorman, Simpson Timber
Wayne Gormley, WDFW
Bob Graf, NW Steelheaders
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Joanne Greenberg, Nooksack Salmon Enhancement Assoc.
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Don Gronas
Mike Gross, WDFW
Bob Gustavson, Washington Forest Protection Assoc.
Jerry Gutzweiler, Weyerhaeuser
Jim Haekma, WOS
Mike Hagen
Donna Hale, WDFW
Hansi Hals
Dave Hamilton, Elma Game Club/SCTU
Tony Hannan, Kitsap Poggie Club
Jim Hansen
Nels Hanson, WFFA and Tree Farmer
Ken Harper, Tacoma Poggie Club
Brian Hatfield, Washington State Representative
Jim Hearn
Peter Heide, Plum Creek Timber
Sara Hellberg, WCA
Tracy Herken
Al Hinkle
Dana Hiler, Puget Sound Anglers
Dick Holden, County Cattlemen
Allan Hollingsworth, Grays Harbor Gillnetters
Ron Holtcamp, Trout Unlimited
H. Daniel Holton
Clifford C. Homola, Tree Farmer
K. Honeycutt, USFS
Julie Hooff, WDFW
Don Hopkins, Forest Land Owner
Ernesta & Francis Horne, CCFF
Stacy Horton, NPPC-WA
Don Howard
Gerald Howard
Pam & Larry T. Huddleston
Scotte Hughes, Trout Unlimited
Marc Hulbert, Washington Trout, Fourth Corner Fly Fishers
Chad Hults, Western University, WESA
Craig Hunley, Olympic Peninsula Guides Assoc.
Lee Hunsperger, Wapato School Dist.
Harry Hurless

Bill Huyenz, Landowner
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Martha Ireland, Clallam County Commissioner
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Chris Kregger, Gardena Farms Irrigation Dist.
Paul Kriegel, Goodyear Nelson
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Mark LaRiviere, Tacoma City Light
Adolph & Alice Larsen, Gillnetters
Dennis Larson, LCFF
Julie Larson, Wapato Public School
Justin Larson, Whitman/Army Corps Intern, Whitman College
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Jane & Ron Lauzon, Snoqualmie Tribe
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Gerald & Dorothy Magill
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Hank Marshall, Okanogan Cattlemen's Assoc.
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Fred Pickering
Larry L. & Barbara Pierce
Rand & Matthew Pierce
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Ed Pomeroy
Allan Poobus, FFF
Rich Potter, Champion
Mike Poulson, WA State Farm Bureau
Terry Prager, Fish First
Rachel Prentice, Bellingham Herald
Dean Priebe, Longview Fibre Co.
Lloyd Pursely, Pursley Family Tree Farm
Marilyn Pursley, LCFFA
Ron Pursley, Tree Farmer, WFFA
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Diana Randall, Lewis County
Don Rapelje, WDFW
Tim Rashko, Trillium Corp.
Pat Rasmussen, Leavenworth Audubon Adopt-a-Forest
John Rea, WW Co. Wheat Grower
Robert Rea, WW Co. Wheat Grower
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Skip Richards
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Fred & Joan Rinard, Sport Fishers
John Ritter, Vancouver Wildlife
Steve Robards, WDFW, Eastbank Complex
John Roberts
Peter Roberts
Will Roehl
Bob Ronnie, Peninsula Bird Hunters Pheasant Forever
Jane Rose, Agriculture
Doug Rose, Port Townsend Leader, Columnist
Robert Rose, Cattlemen's Assoc.
Bob Roth, Longview Fibre
Dick Rubenser
Ed Rucky, Fourth Corner Fly Fishers
Brian Russell, WDFW
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Harry Taggart, Skagit Fisheries Enhancement Group

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Steve Thompson, S. T. Logging
Arn Thoreen, Skagit Fisheries Enhancement Group
Steve Tift, Longview Fibre
Ron Tingley, Wildcat Steelhead Club
Keely Titus
Mike Tobin, N. Yakima Conservation Dist.
Bill Tometich, Mason Timber Co.
Michael Tonseth, WDFW
Julie Toomey, Skagit Fisheries Enhancement Group
Dave Townsend
Wade Troutman, Irg Apples & Dryland Wheat
Peter Treareiel, Fisher
Doug Truax, Nielsen Brothers, Inc.
Lee Anne Tryon, WEC/SOS
Bob Tuck
Bill Tugan, Vaagen Bros. Lumber, Inc.
Steve Tweit, Boise Cascade
John W. & Ruth Umberger, Okanogan Farm Bureau
Bruce V. Vails, INWC
D. L. Vance, QA Engineer
Pete VanSickle, The Campbell Group
Jim VanderPloeg, Boise Cascade
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Jerry Vigil
Eve Vogel, Vancouver School of Arts & Academics
J. D. Wade, Press
Edward G. Walker, Charter Boat Owner
Jim Walton
A. Warren
Nat Webb
James R. C. Weheter, Okanogan County Fly Club
Gary Westman, PSVOA
Duane Weston, WA Farm Forestry Assoc. & Pilchuck Tree Farm
Jaques White, People for Puget Sound
Tom White, Washington Fly Fishers
Dick Whitmore, Forest Engineer

Bob Wiesen
Jim Wilcox, Trout Unlimited
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Larry Williamson, Grant Farm Bureau
Maurize Williamson, WFFA
Jan Willing, PUD
Peter Willing, Water Resources Consulting
Buck Wilson, Green Crow
Dave Winckler, Franklin Co. Farm Bureau
Robert Wirtanen, Farmer
Des Witt
Linda Wolfe, Sierra Club
Bill Woolums, Pheasants Forever #257
Dan Wood
John A. Wood
George Wood, WA Assoc. Wheat Growers
Leon Woodworth, Tacoma Poggie Club
Terry Wright, Northwest Indian Fisheries Commission
Tom Wynne, WFFA and Tree Farmer
Ata Yazdaniha, Rezvan Orchards
John Yenney

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Aberdeen

1. Who's doing the over-fishing, Grays Harbor, Willapa we have record runs.
2. Agree with marking hatchery fish, is this really doable? Everybody will need markings at the same time. Marking is limited, a good goal, but maybe not feasible.
3. Who will pay for all this? Who will get it done?
4. Throw out Alternatives #1 and #2. Alternative #5 is the best for this community - this is a benefit.
5. Why should we take cuts because of your past management failures? Don't agree with where this is leading. Small farmers, landowners, will be negatively affected by buffers. We need agencies to work with us. Alternative #3 says you work with us, but demands increased buffers.
6. Spawner abundance - our coho negatively affects returns of adults. Should be an escapement goal in Grays Harbor - stay below 40,000.
7. Fish and Wildlife Congress - have strategy on what's best for salmon to recovery. Does the policy address this?
8. Marking - what protection do commercials have to get 50%? WSP already being implemented. Any chance of exempting Grays Harbor and Willapa Bay from restrictions? We are unique!
9. What's status of RSI? Emphasize, recognition of FEG's, PR and production.
10. Pacific County - Willapa Bay - Harvest-Gill nets are in the water in August, stay in until the end of November, they catch 90% of the fish and the flow to the hatchery stops. Sportsmen denied access to fish below hatcheries - don't get a chance to fish, the fish move up too fast. Sportsmen want two weeks earlier access. Stock summer and winter steelhead. Recycle fish program for increased quality fish.
11. Surplus fish - carcasses returned to streams? Should be left as nutrients, not pet food.
12. Why fish for wild fish at all? Habitat issue. Get rid of seals.
13. Stagger days in netting or take them out for a couple of days. Sportsmen access. Make the netting every other day - not every tide.
14. Inequities in Willapa Bay - sportsmen can't fish in freshwater (sturgeon). Gill nets fish 24 hours/day .
15. What will WSP do differently? Want plenty of fish - not just a sustained run!
16. Salmon spawning in the wild is inefficient.
17. Special WAC - excuse to target sturgeon. If sportsmen get to fish by August - its over. Commercials in there targeting sturgeon. Bycatch should be cut to 10%-15% of total catch - rather than 50%.

18. Grays Harbor net pens. This year only 150,000 (coho). Department said fishery at 28th Street landing on Chehalis. After PFMC no 28th fishing - closed because of big boat (buoy 13) fishing at Westport. This will impact coho fishery more than 28th fishery. Why as it shut down?
19. Why not close fisheries on a rotation basis. Get wild stock up - new policies could maintain them.
20. This policy - if it has blanket policy of buffers will not make it with landowners.
21. Existing buffers for Alternatives #1 and #2 riparian zones - Common approach - need more site specific operations - maybe no buffers.
22. Develop the kind of specifics in the riparian zone that won't blow down.
23. Landscape design and management. Type 4 and 5 streams - no temporary consideration, no LWD requirement (i.e.
24. Manage from spawning grounds down - not the opposite.
25. Why are we trying to wipe out chum - i.e. harvest - when chum do well, coho do well.
26. Object to throwing carcasses around the watershed. Get back to what you want to achieve.
27. Carcasses provide nutrients/food for fish. For whole ecosystem.
28. Plant cottonwoods, etc. in Types 3 and 4.
29. Need to control all the predators - seals, mergansers, cormorants.
30. WDFW budget cuts - Department is not approaching the public with - need to solicit help. Policy has a bad approach. Never accepted public help.
31. Agency opposes all programs involving volunteers.
32. What real data is needed to make good decisions. Need more foundation.
33. Need to have all species that were present historically.

Aberdeen

1. **Response:** We disagree.
2. **Response:** We agree. It is feasible.
3. **Response:** It is a legitimate part of hatchery costs and operations.
4. **Response:** We disagree.
5. **Response:** Comments noted. See entire revised FEIS.
6. **Response:** We disagree. See revised Appendix B.
7. **Response:** No.
8. **Response:** Comments noted. See revised Chapters II and IV.
9. **Response:** See revised Appendix H.
10. **Response:** Comments noted. See revised Chapters II and IV.
11. **Response:** We agree within the context of Alternative 3.
12. **Response:** Comments noted.
13. **Response:** Comments noted.
14. **Response:** Comments noted. Beyond scope.
15. **Response:** See revised FEIS.
16. **Response:** We disagree. See revised Appendix B.
17. **Response:** Comments noted. Beyond scope.
18. **Response:** Comments noted. Beyond scope.
19. **Response:** Comments noted.
20. **Response:** See revised FEIS.
21. **Response:** See revised FEIS.
22. **Response:** See revised FEIS.
23. **Response:** See revised FEIS.
24. **Response:** We do not understand this comment.
25. **Response:** See revised Alternative 3.
26. **Response:** Comment noted.
27. **Response:** We agree.
28. **Response:** Comment noted.
29. **Response:** Most important salmonid predators are protected by federal laws.
30. **Response:** Comments noted.
31. **Response:** We disagree.
32. **Response:** We disagree.
33. **Response:** We disagree.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Bellingham

1. Skagit coho - mostly harvested in Canada, five and six strips deep. If they continue this we won' be successful. Like escapement driven management vs. harvest driven.
2. Problem with netting after Boldt, runs have declined. Stillaquamish shut it down for 10 years (all fishery).
3. Harvest numbers are going down all the time. The problem is more than recreational, look at other predators, marine mammals are taking a great toll. 300,000 take 1.7 billion salmon. Closing fisheries alone won't work. Address this.
4. Agree with the above. Also big ships taking lots of fish.
5. MSY - err on side of conservation. Like Alternative #2 - protects genetic stock - full utilization concept. Assure adequate spawners with full range of genetic diversity.
6. Area 7 - wants data - Pt. Roberts, Gulf of Georgia (i.e. summer coho). Returning coho 2.2. pounds.
7. Seals, sea lions, herons take a lot of fish. This needs to be addressed.
8. Difference in harvests and bycatch in different areas, i.e. straits, coasts, Gulf of Georgia (Fraser River) - trade offs - sockeye for silvers - one fishery for another.
9. Steelhead - should be restricted to no more than 3/month; no more than 5 in any river system, i.e. Alaska law, takes boat, strict penalties, criminals stay away.
10. Incidental (bycatch) has been a problem - runs losing strength.
11. Wild fish have suffered with hatchery management zones. Incidental catch has great impact on wild fish. Now mostly hatchery fish left. Don't exhaust all wild fish. Work with other managers to develop WSP.
12. Bycatch has been very low in area 7 and 7a.
13. How will you enforce punchcards? All areas of harvest? Crabs are unenforceable.
14. Wear usable license with a number on it.
15. Need agreement (on WSP) with treaty tribes.
16. Public perception - tribes taking more than their share.
17. What will be done about Canadians intercepting our fish? Don't use commercial fishermen as scapegoat.
18. Genetic degradation is a real problem. Most hatchery fish need to be harvested, so left to interbreed with wild stock.

Bellingham

1. **Response:** Comments noted. See revised Appendix B.
2. **Response:** Tribal fishing is conducted pursuant to federal laws.
3. **Response:** We disagree. Most important salmon predators are protected by federal laws.
4. **Response:** We disagree. High seas gill netting has been banned by international agreement. Existing trawl fisheries are closely monitored (see detailed response to written comments).
5. **Response:** We agree with the first and third sentences, disagree with the second. See revised Chapters II and IV and revised Appendices B, D, E, F, and G.
6. **Response:** Comment noted. Outside scope.
7. **Response:** See response to #3.
8. **Response:** Comments noted. Outside scope.
9. **Response:** Comments noted.
10. **Response:** We agree.
11. **Response:** We agree.
12. **Response:** We disagree. It has been variable.
13. **Response:** Comment noted. Outside scope.
14. **Response:** Comment noted.
15. **Response:** Comment noted.
16. **Response:** Comment noted.
17. **Response:** International negotiations cannot be dealt with in a SEPA process.
18. **Response:** We agree.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Naselle

1. What would be impact of preferred alternative on current Naselle chinook fishery?
2. We don't have "wild" fish in the Willapa. Document does not explain where "wild" fish will come from.
3. What happens to "excess" marked hatchery fish?
4. Need more RSI sites.
5. Need to open all areas at the same time (Columbia River, Willapa, Grays Harbor).
6. Bear River not chinook or coho stream.
7. Don't implement WSP early (i.e. Bear River).
8. Marking negatives - costs, mark mortalities, hook-and-release mortalities. Extra costs will result in loss of money for production.
9. Cormorants are problem predator.
10. Seals are problem predator.
11. What will happen to surplus fish at hatcheries? Fish are being surplussed at expense of spawners.
12. Put surplus fish from hatcheries in streams for nutrient enrichment (freeze - plant in spring).
13. Don't agree with putting fish in habitat before habitat is restored.
14. Columbia River coho - how do you balance fishery economic benefits against creating/maintaining "wild" fish populations when doing whats needed to curtail harvest?
15. Want watershed-by-watershed plan. It is too difficult to get enhancement projects started - agency should encourage them.
16. Naselle Hatchery needs weir - state needs to sit with public to assure "proper" disposal of surplus (not sold). Should be able to continue to use long-term, donor stock through first generation.
17. Assess streams.
18. What is capacity of Willapa Bay streams? Why aren't we putting hatchery fish upstream?
19. Don't have "wild" fish.
20. What is fin-clipping mortality?
21. Gillnets don't work for selective fisheries - can't release marked fish alive.
22. Releasing fish smaller results in fish more "wild" like.
23. If truly is a salmon problem, why keep fishing?
24. Only fishing one day per week - competing with hatchery surplus -eggs that go to fish farming.
25. Why is state in fish selling business? State should get out.
26. Can state have influence on marine survival, marine harvests, etc?
27. Department has zeroed-in on timber industry because they are an easy mark - the state doesn't know what else to do.
28. Why not use Willapa fish throughout Willapa Estuary (are all same stock?).

29. Terminology needs to be clarified (wild = ?).
30. Need to get information on habitat and carrying capacity.
31. Is MSY driver in establishing escapement goals?
32. Need to run each area as individual - don't want blanket policy (on watershed basis).
33. Need to use local expertise.
34. Need hatcheries at full capacity.
35. Don't have "wild" fish in some systems.
36. Harvesters have paid price - if department plans fisheries on just wild fish, then won't have fisheries.
37. Need tribal cooperation.
38. What is department going to do for harvest/ers?
39. What was "original" use of hatcheries - supplementation? Need to go back and use them for that - use all tools (RSI, fry plants, etc.).
40. Barriers - natural and man-made - need to be addressed. Dams on Columbia River - dams are obsolete. If federal government wants to be in electricity business build gas turbines, stop subsidies to all industries along the Columbia River.
41. Looks like intent is to stop non-treaty fishing.
42. What is state going to do about treaty fisheries?
43. Columbia River predators - squawfish, etc. behind the dams.
44. Commercial fishermen only harvested a small number of fish. How many fish did the state harvest (surplus)? What was tribal harvest - are off balance.
45. Is state going to go after Columbia River mitigation money?
46. Need to look at all harvest - including high seas catch - "bycatch", i.e. Tyson Foods.
47. How many salmon are harvested by predators (seals, birds, etc.)? Need to quantify.
48. When are we going to drop Puget Sound resident programs - chinook and coho?
49. When is state going to take responsibility for predators (i.e., marine mammals) and tell the feds? If they won't, we will.
50. Columbia River - concerned about conflict (different management strategies) which will arise when the "compact" sets seasons for Columbia River gillnetters.
51. Also NMFS and ESA - wonders about outcome and commissions and directors' views.
52. PFMC will WDFW choose its strategies?
53. Let more fish go upstream and decay into food chain.
54. Quit selling eggs and fish. Why has it taken this long?
55. Why did they change steelhead to smaller steelhead in Willapa Bay?
56. Fish used to be a lot bigger (steelhead and salmon).
57. Why use jack salmon?
58. Why not breed big fish only?
59. What about releasing fish at different times?
60. Predators killing us.
61. Need to know hatchery from wild and native fish.
62. How can we keep hatchery and wild fish from mixing?
63. Conflict with state law - no fisheries without hatcheries.
64. No viable populations in streams now. Predator populations.
65. Determining hatchery fish by adipose clip will not work.
66. Do factory trawlers have ability to track pit tags?
67. Cormorants eat smolts.

68. Why is there no coho in Grays River net pens? Why sell eggs when there is not enough for hatcheries?
69. Fish management and greed cause of fish decline.
70. Plant all hatchery fish. Let go upstream. Now wild fish - all have been through hatchery.
71. Look at each area separately. Don't lump for policy implementation.
72. Is state in the fish business? Get out!
73. More excess fish in hatcheries under policy.
74. Hatchery on Nemah wiped out cutthroat.
75. Why isn't salmon most important? No vacations.
76. Ensure watershed councils are prepared to deal with stocks and fishing patterns.
77. Need public involvement training for staff.
78. Rivers too clean - less fish.
79. Local-based resource management.
80. Different groups in Willapa work together.
81. Hatcheries go 100%. Rebuild streams up to 100% goal. Use hatcheries to augment.
82. How much genetic diversity exists in Willapa? Is there inbreeding?
83. Use advisory committee to determine public policy for hatcheries.
84. Use hatchery fish to jump start streams.
85. EIS sounds like hatchery bashing. Use local people, use hatchery fish as tool to rebuild streams.
86. Wherever possible use net pens for raising and releasing fish. Expand hatchery production.
87. Hatchery racks off stream and die in river. Folks unified for trying to help. Put chums in hatchery management plans.
88. State-wide wild steelhead release. Want wild release in Willapa.
89. Negatives to mass marking - net loss. Makes hatchery operate less productively.
90. Increase smolt plants to help ESA (predator base).

Naselle

1. **Response:** See revised Chapter IV.
2. **Response:** We disagree. See revised Chapters II and IV and revised Appendices D and E.
3. **Response:** See response to #1.
4. **Response:** We agree within the framework of Alternative 3.
5. **Response:** This suggestion has merit and should be considered by managers.
6. **Response:** We disagree. See revised Chapter II.
7. **Response:** We agree but basic resource conservation problems still need to be addressed even in the absence of a policy.
8. **Response:** These same issues have a long history of being raised by opponents of the basic proposal. They were all raised in the past for steelhead and sea-run cutthroat but, in actual practice, proved to be incorrect.
9. **Response:** We agree.
10. **Response:** We agree.
11. **Response:** This situation would be directed by future policy guidance to the WDFW staff.
12. **Response:** We agree and are already doing this.
13. **Response:** We agree within the context of revised Alternative 3.
14. **Response:** See revised Chapter IV.
15. **Response:** We agree.
16. **Response:** We agree.
17. **Response:** We agree.
18. **Response:** This will need to be addressed. See revised Chapter IV.
19. **Response:** We disagree.
20. **Response:** Less than 5% for the adipose fin, greater than 20% for any other fin.
21. **Response:** We agree but see revised Chapter IV.
22. **Response:** We disagree. It is not this straightforward.
23. **Response:** A number of salmonid populations are still healthy and productive. See revised Chapter IV.
24. **Response:** No future management decision should be based on producing surplus eggs for sale.
25. **Response:** Authorized by existing state laws.
26. **Response:** No on survival, yes on harvest.
27. **Response:** We disagree.
28. **Response:** They are not all the same stock. See revised Appendix E.
29. **Response:** See revised Appendix A.
30. **Response:** We agree.
31. **Response:** It is a beginning point that can be quantified. See revised Chapters II and IV and revised Appendices B, D, and G.
32. **Response:** We agree but are opposed to "downside flexibility." See revised Chapter IV.
33. **Response:** We agree.
34. **Response:** We agree within the context of Alternative 3.
35. **Response:** We disagree.
36. **Response:** We disagree. See revised Chapters II and IV.
37. **Response:** We agree.

38. **Response:** See revised Chapter IV.
39. **Response:** Yes, and we agree, respectively.
40. **Response:** Comment noted.
41. **Response:** We disagree. See revised Chapter IV.
42. **Response:** Treaty Indian fishing is conducted pursuant to federal laws.
43. **Response:** A program is already in place to control squawfish.
44. **Response:** We disagree. See responses to #24, #25, and #42.
45. **Response:** Yes.
46. **Response:** High seas gill netting has been banned by international agreement and existing trawl fisheries are closely monitored (see detailed response to written comments).
47. **Response:** Estimates have been made many times in a variety of formats and are available in the fisheries literature. Most important salmon predators are protected by federal laws. Their detailed management cannot be addressed through the SEPA process.
48. **Response:** This is beyond the scope of the current effort.
49. **Response:** See response to #47.
50. **Response:** See revised Chapters II and IV.
51. **Response:** See response to #48.
52. **Response:** See response to #48.
53. **Response:** We agree within the context of Alternative 3.
54. **Response:** See responses to #24 and #25.
55. **Response:** Current hatchery rearing practices tend to change the maturity schedules of steelhead (to younger age at maturity).
56. **Response:** We agree.
57. **Response:** Based on the past advice from genetics experts.
58. **Response:** Past state programs and some current tribal programs have attempted to specifically produce large fish.
59. **Response:** This is already a common practice.
60. **Response:** See response to #47.
61. **Response:** We agree. See revised Alternative 3.
62. **Response:** See revised Chapters II and IV.
63. **Response:** We disagree. "Without hatcheries" is not being proposed.
64. **Response:** We disagree. See revised Chapters II and IV and revised Appendix B.
65. **Response:** We disagree. It has a proven track record for steelhead in Washington, Oregon, Idaho and British Columbia.
66. **Response:** We do not know. See response to #46.
67. **Response:** We agree.
68. **Response:** Beyond the scope of this process. See response to #24.
69. **Response:** Comment noted.
70. **Response:** We do not understand this comment but it sound like the basic approach to steelhead management in British Columbia (eggs for the hatcheries come from unmarked wild fish).
71. **Response:** We agree within the context of Alternative 3. Also see response to #32.
72. **Response:** See responses to #24 and #25.
73. **Response:** We disagree. See revised Chapter IV.
74. **Response:** Comment noted.

75. **Response:** We do not understand the comment.
76. **Response:** We agree.
77. **Response:** We agree.
78. **Response:** We agree if this refers to things like large woody debris.
79. **Response:** We agree within the context of Alternative 3.
80. **Response:** We agree.
81. **Response:** We agree within the context of Alternative 3.
82. **Response:** We are not aware of any specific test results. Inbreeding certainly occurs.
83. **Response:** We agree that they should be one source of input.
84. **Response:** We agree where warranted. See revised Chapters II and IV.
85. **Response:** See revised FEIS. We agree (second comment).
86. **Response:** See revised Chapter IV.
87. **Response:** See revised Chapters II and IV.
88. **Response:** Will be used as needed to protect wild fish.
89. **Response**: See response to #8.
90. **Response:** Comment noted.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Port Angeles

1. This year's more liberal than agency preferred Alternative #3.
2. How does mesh size alter size of catch?
3. Wild fish has something "more" than hatchery fish: cultural.
4. Didn't see a lot of difference between harvest management alternative...what are differences?
5. As farmer-concerned with focus on wild which are less productive than compared to hatchery, comparison to producing wild vs. farm wheat.
6. Snider Creek broodstock-wild and larger fish.
7. Has agency approached tribes about implementing mesh restrictions?
8. Why should we trust agency to solve salmon problem when it admits to causing it?
9. More faith in other groups to solve problem: e.g. Chehalis Basin Fisheries Enhancement Task Force/Diane Ellison.
10. What good is it to reduce our harvest with Canad fishing? Policy doesn't address this.
11. Where are "state's" rights related to harvest opportunity?
12. How does MSY get changed to reflect on-going habitat degradation?
13. Reducing harvest by being more conservative than MSY would dictate.
14. Need to deal with Canadian harvests.
15. U.S. refusing to enter into binding arbitration with Canada-why?
16. How do you tell the difference between wild and hatchery salmon now?
17. What criteria are used to establish what adequate escapement is?
18. Would like to see more nutrient load go into system in excess of MSY.
19. What is your plan to re-establish runs where fish are no longer visible in system?
20. Reduced coho size due to gillnet gear selectively harvesting larger fish.
21. Why can't state talk to federal government about gillnet fishery and seals?

Port Angeles

1. **Response:** We agree. The policy was only a proposal at the time decisions were made on this year's fisheries.
2. **Response:** Each gill net mesh size has a bell-shaped selectivity curve for a certain size range of fish.
3. **Response:** We agree. See revised Appendices B, E, and F.
4. **Response:** See revised Chapters II and IV. The differences are more evident.
5. **Response:** See revised Chapters II and IV and revised Appendices B, E, and F.
6. **Response:** This is beyond the scope of the current effort but see revised Chapters II and IV and revised Appendix E.
7. **Response:** No. Tribal fisheries are managed pursuant to federal laws.
8. **Response:** You should not even though different people were responsible. Trust can only be earned by achieving a successful record of professional natural resource management.
9. **Response:** We believe both are needed to achieve eventual success.
10. **Response:** The Canadians cannot overfish our salmonid populations without doing the same thing to their own. A recent publication by the American Fisheries Society shows that this has already happened (Slaney et al. 1996). We do not know if they will continue this strategy of fishing.
11. **Response:** Do not understand the comment but the revised document clearly recognizes existing state laws.
12. **Response:** See revised Alternative 3.
13. **Response:** See revised Chapters II and IV and revised Appendices B, D, and G.
14. **Response:** We agree but you cannot deal with international negotiations in a SEPA process.
15. **Response:** We are not cognizant of these details.
16. **Response:** Adipose marking for steelhead and sea-run cutthroat, scale analysis for coho salmon. See revised Alternative 3.
17. **Response:** See revised Alternative 3, revised Chapter IV and revised Appendices B, D, and G.
18. **Response:** See revised Alternative 3, revised Chapter IV and revised Appendices B, D, and F.
19. **Response:** See revised Chapters II and IV.
20. **Response:** We agree. See revised Appendix E.
21. **Response:** We do.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Seattle

1. Imprint pond-good returns-except when floods (chum). Supports hatchery program in Seattle, and urban areas, imprinting process in general.
2. Concerned about black mouth fishing and it's impact on other populations.
3. MSY-Concerned that WDFW sees MSY as having too many risks.
4. Selective Fishing-gill nets, etc. - seems like an oxymoron.
5. $10 blackmouth enhancement-what is impact of this fish on others?
6. MSY - few examples of where this has ever really worked.
7. Kelp - resource hasn't been evaluated-estuarine habitats a concern.
8. Impressed that Department is listening to science, not user groups. Environmental group supports agency's scientific based effort.
9. South Puget Sound - spring coho (immature) sport fishery is very small compared to other fisheries. Concerned about thousands of down-riggers targeting young fish. WSP should address targeting harvest of immature salmonids.
10. Concentrated commercial take at terminal, not at sea.
11. Clipping - how do commercials work with that?
12. Drop gill nets 6-10 feet to reduce steelhead bycatch.
13. Canada - how will plan address this political nightmare, i.e. Hood Canal situation?
14. What kind of gear restrictions?
15. Watershed management - how will harvest be managed? Didn't read this in WSP!
16. Troubled - Alternative #3 talks about MSY. Should be more concerned about spawner abundance. Top priority.
17. Won't we have to go lower than 50-60% on salmon?
18. Not conservative enough spawning goals.
19. Concerned about hooking mortality in selective coho and chinook. How will WSP deal with this, is it realistic? 35%
20. MSY-downfall-how will WSP modify?
21. Hooking mortality - as high as 80% on bait-size of fish, species has impact also.
22. Change the name of this section to spawner abundance or escapement.
23. If we are worried about wild stocks, why take any?
24. Should have special regulations this year.
25. What about a complete moratorium?
26. What % of bycatch before Department does something or will fishermen have to move to another area?
27. Use purse seines instead of gill nets if possible.
28. Stay away from blanket solutions. Watershed specific or run specific solutions so all agree.
29. When can I harvest wild salmonids again? I only want to catch wild salmon.

30. Stop managing the fish. Let nature manage the fish.
31. Spawner abundance-Alternative #2 is critical in providing the target - then we'll see what we can do about harvest.
32. Fin clipping - how will this be enforced? Concerned whole run can be harvested without enforcement.
33. Enforcement - Peninsula hardly any enforcement. Alternative #2 is the only way to solve (tribal issue). WDFW do better education - don't have to kill a fish for good experience.
34. Vote for strong harvest control. This will stimulate wild spawning. Need spawners for nutrients.
35. WSP - how much $ for education of sportsmen and publics? Explain why - rationale to get compliance.
36. What is Enforcement budget relative to other programs?
37. Need budget for these public meetings.
38. Study - how much to produce hatchery fish? How much support from habitat and enforcement? Less hatchery money, more enforcement and habitat money for fish.
39. Stop (fishing)/study for 3 years - take money from hatchery program.
40. Will state shut down native harvest if not meeting new spawning goals?
41. If you say year goal to be conservative, why not choose Alternative #2?
42. WSP cannot compete with federal law.
43. How much study on improved scientific study on gear?
44. Why, as a Native American, should I be afraid/threatened by this policy?
45. Do we know relative impact, $ from sport fishing? Commercial harvest, who gets this money, who benefits, and to what degree? How much stays in communities? How much to cops?
46. Department doesn't have much political clout, that comes from the public. Habitat problem, etc. - water legislation - everyone wants water - we must work hard publicly.
47. Need Governor's commission.
48. How big a problem is water taken out of rivers?
49. Too light on resident trout.
50. If we manage to carrying capacity - we should restore river to raise carrying capacity of that system. What relation is that to full capacity?
51. Are you going to manage bycatch? Both commercial and native harvesters?
52. Wouldn't use of catch-and-release regulations maintain good sport fishery (and economic benefit therefore) allowing for good escapement for spawning?

Seattle

1. **Response:** We agree.
2. **Response:** We agree. See revised Appendix B.
3. **Response:** See revised Alternative 3 and revised Appendices B, D, and G.
4. **Response:** See revised Chapter IV.
5. **Response:** See response to #2.
6. **Response:** We disagree. See revised Alternative 3, revised Chapter IV, and revised Appendices B, D, and G.
7. **Response:** We agree.
8. **Response:** Comment noted.
9. **Response:** We agree. See revised Alternative 3 and revised Appendix B.
10. **Response:** We agree.
11. **Response:** See revised Chapter IV.
12. **Response:** A good idea but has greater practical application potential in Canadian fisheries.
13. **Response:** International negotiations cannot be dealt with through the SEPA process. See revised Chapters II and IV and revised Appendix B.
14. **Response:** See revised Alternative 3 and revised Chapter IV.
15. **Response:** See revised Chapters II and IV and revised Appendix G.
16. **Response:** We agree. See revised Alternative 3.
17. **Response:** Yes, but this depends on status of each population. See revised Chapter IV.
18. **Response:** We disagree but see revised Alternative 3.
19. **Response:** We have carefully examined the North American database on salmonid hooking mortality. Two thing are consistent among all the considerable experimental work that has been done. First, you cannot kill salmonids by stress of exercise encountered in normal recreational angling practices (exceptions might be the use of downriggers and summer steelhead angling in streams during high water temperatures). Second, the mortality rate is always closely related to the incidence of injuries in certain critical anatomical areas (eyes, gills, etc.). The recreational fisheries which we expect to be managing in the future in Washington should produce a low rate of injuries in critical areas. At this point in time, we would use a 5% mortality rate for planning purposes. This is consistent with the following from Wright (1992, p. 523): "The chance of mortality from a single hooking event was examined for various unweighted combinations of terminal gear from our compilation of research results. The categories and single-event losses were as follows: Barbless hooks with flies, 1.76%; All barbless hooks (with flies or lures), 2.16%; Barbless hooks with lures, 3.00%; All hooks with flies, 3.34%; Barbed hooks with flies, 3.88%; All barbed hooks, 5.86%; All lures, 6.56%; Barbed hooks with lures, 6.86%."
20. **Response:** See revised Alternative 3 and revised Chapter IV.
21. **Response:** See response to #19.
22. **Response:** A good idea. We should be "spawning escapement managers," not "harvest managers."
23. **Response:** We still have a number of healthy and productive populations. See revised Chapter IV.
24. **Response:** It would be inappropriate to start implementing a policy while it is still a proposal.
25. **Response:** See response to #23.

26. **Response:** This will need to be addressed during policy implementation. See revised Chapter IV.
27. **Response:** See revised Chapter IV.
28. **Response:** We agree but are opposed to "downside flexibility." See revised Chapters II and IV.
29. **Response:** Immediately as per prevailing fishing regulations.
30. **Response:** We disagree with the first statement.
31. **Response:** We disagree. See revised Chapters II and IV and revised Appendix D.
32. **Response:** Enforcement would be on the same basis as any other fishing regulation. This approach has been used for steelhead in Washington, Oregon, Idaho and British Columbia since the mid-1980's.
33. **Response:** See response to #32. In addition, tribal fisheries are conducted pursuant to federal laws. We agree with the last statement.
34. **Response:** We agree.
35. **Response:** This is a detailed question regarding the agency budget and beyond the scope of what we are trying to address in this process. We suggest that this be pursued as a separate inquiry to WDFW.
36. **Response:** See response to #35.
37. **Response:** See response to #35.
38. **Response:** See response to #35.
39. **Response:** We disagree. See response to #23.
40. **Response:** No decision has been made at this point on the degree of use for existing state conservation authority. It may prove to be a moot issue.
41. **Response:** We believe this is more conservative than is necessary to achieve success in salmonid resource management. See revised Chapters II and IV and revised Appendix D.
42. **Response:** We agree where the two are in conflict.
43. **Response:** See revised Chapter IV.
44. **Response:** You should not be. It is in your best long-term interest to support revised Alternative 3.
45. **Response:** Yes. There have been repeated and detailed analyses of these types of issues over the past several decades. None of these has contributed significantly to recovery of the salmonid resources. See revised Chapter IV.
46. **Response:** We agree.
47. **Response:** We agree.
48. **Response:** It is a major problem in some river systems, particularly in eastern Washington.
49. **Response:** We agree but see revised Chapters II and IV.
50. **Response:** See revised Appendix D.
51. **Response:** Yes. See revised Alternative 3.
52. **Response:** Yes in a number of situations. See revised Chapters II and IV.

Harvest

Spokane

1. Concerned about Native American harvest of Columbia River steelhead being more selective; for example, sorting fish at ladders rather than indiscriminate netting.
2. Concerned with high seas fishery and no state jurisdiction there.
3. So much industry is involved like dams, logging, agriculture, that it comes down to money. How can state affect a change? As a farmer, I'm willing to sacrifice a little, but everybody's going to have to. Harvest hinges on habitat.
4. Tribal catch should be for their own use, not for money (selling fish).
5. Problem is not harvest; fish need places to spawn.
6. Restrict harvest severely. Close down for two to three years if need be to restore runs.
7. Address indiscriminate netting in Puget Sound.
8. Support separate management of wild and hatchery fish, but gill-netting is indiscriminate; stop gill-netting.
9. Get tribal catch taken care of without gill-netting.
10. Look at trawlers, gill-netters before restricting other fishermen.
11. Feds (NMFS) can/should enforce ESA.
12. Mark fish so they can be harvested at ladders.
13. Monitor harvest closer.
14. Need tribes to buy into plan. Concerned about statement that WDFW needs to get own house in order before dealing with tribes, others.
15. Tribes should be working to save wild fish, too.
16. It's myopic to concentrate on Washington State alone; a unified policy is need for whole area, region.
17. Sportsmen should have priority in harvest.
18. Hold summit with tribes, WWP, BPA, etc. All have to give up something.
19. Get all gill-nets out of the Columbia River. If it takes suing the tribes, do so. If it takes giving them fish from net pens, do so.
20. What about Canadian interception? Can't we just tell them "hands off?" We need to minimize Canada's impacts.
21. Support unlimited brook trout harvest where they compete with native cutthroat and bull trout.
22. Concerned that certain types of harvest be regulated (i.e., gill-netting).
23. Address safe passage of juveniles through streams; most of the loss is going on there. Need to address barging as a failure.
24. Require tagging of fish upon harvest to keep accurate tracking.
25. Address enforcement of harvest regulations.
26. Net pen rearing of salmon would eliminate need for commercial harvest. This is an economic issue for the state.

Spokane

1. **Response:** Tribal fishing is conducted pursuant to federal laws. We have no legal authority to implement this type of change in fishing practices.
2. **Response:** We agree with respect to lack of state jurisdiction but do not share the concern. High seas gill netting is now banned by international law and existing trawl fishing is closely monitored (see detailed response to public written comments).
3. **Response:** We believe that positive changes can be made but agree that it will take efforts from everyone. We need to be successful in both harvest management and habitat management in order to be successful overall.
4. **Response:** See response to #1.
5. **Response:** See response to #3.
6. **Response:** We disagree since many salmonid populations are still healthy and productive at the present time. See revised Chapter IV.
7. **Response:** We disagree with the "indiscriminate" connotation. See revised Chapters II and IV.
8. **Response:** See responses to #1 and #7.
9. **Response:** See response to #1.
10. **Response:** See responses to #1, #2, and #7.
11. **Response:** This is the existing law. However, some responsibilities could be delegated to the state by mutual agreement.
12. **Response:** See response to #1.
13. **Response:** We agree that this is necessary.
14. **Response:** We agree but everyone always develops their own position before entering into any type of "negotiation."
15. **Response:** We agree and this is happening.
16. **Response:** This is beyond the scope of what we are trying to accomplish. Past "regional" plans do not show a track record of success. See revised Chapter IV.
17. **Response:** We disagree. This would be contrary to existing state laws for salmon.
18. **Response:** See response to #16.
19. **Response:** See response to #1.
20. **Response:** This was beyond the scope of what we are trying to accomplish. International negotiations cannot be conducted through the SEPA process.
21. **Response:** We agree.
22. **Response:** See responses to #1, #2, and #7.
23. **Response:** This is beyond the scope of our current effort.
24. **Response:** This is a good idea and may well be part of future management. The concept has been used successfully by other jurisdictions.
25. **Response:** Beyond the scope of the present effort.
26. **Response:** We disagree with this conclusion. See response to #1.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Tacoma

1. What progress is being made with "other entities?"
2. Allowing more escapement sounds good, what input do tribes have? Common plan to take some of their nets out of the rivers.
3. Need something measurable, to demonstrate that just creating more wild salmon won't "fix" the problem.
4. Canada - they are the single biggest harvesters of endangered fish. WDFW needs to step up to the plate. U.S. needs to put money up (Hell's Gate), they took the fish, didn't put up the money.
5. WDFW needs public support to negotiate successfully. Need community sharing responsibility - WDFW needs the public.
6. Percent shares need to be abundance driven.
7. Simply allowing fish to get back to spawning grounds won't fix it, everything, (i.e., habitat too). To far to turn this thing around.
8. Two tough decisions. A) Alaska - get escapement. Leadership - WDFW doesn't have it. Who's in charge? WDFW has to fight for fish. B) Agree other entities must be dealt with.
9. Concerned about cutthroat trout.
10. Would like land owners to be able to do something about those predators (herons).
11. Believe in wild fish.
12. Don't release at a boat launch. Why are there so many dead fish?
13. We are experiencing historical low populations. At what point do we cut it off (everyone wants a slice of the pie)?
14. If fish stocks are going down, we need to stop fishing.
15. Can we convert Indians, others, to selective fisheries instead of set and gill nets in the rivers?
16. How will marking influence coded-wire tagged fisheries?
17. Why do we keep using non-selective fishing methods? Why can't we trap fish in some manner?
18. Concerned about predation by blue herons. What is WDFW doing about this?
19. Same with cormorants, mergansers. Do something about this.
20. We are giving these predators a free lunch with these dumb hatchery fish.
21. Was hoping part of WSP would push for legislation to ban gill nets.
22. Why do we let commercial fishermen (1%) of population, take so much fish?
23. Provide incentives for people who buy fish to develop their own fish farms? This would eliminate taking wild fish.
24. Need to study rivers/stocks classified as unknown.
25. WSP doesn't state 50% share non-Indians.
26. State/Federal law where they decide how they use their share, i.e. maximum harvest, no

wastage.

27. Policy doesn't address resident coho and chinook in Puget Sound.
28. Doesn't address fish farms or dams.
29. Throw out statement about "Restructuring gear to protect fish."
30. Maybe state should take largest fish in the hatchery to propagate.
31. Look at the big picture - long-term cycles. Maybe we aren't aware of some things.

Tacoma

1. **Response:** See revised Chapter I.
2. **Response:** Tribal fishing is conducted pursuant to federal laws.
3. **Response:** We agree. See revised Chapters II and IV.
4. **Response:** Outside the scope of the current process. International negotiations cannot be handled through a SEPA process.
5. **Response:** We agree.
6. **Response:** We agree.
7. **Response:** We agree with the first statement, disagree with the second.
8. **Response:** Comment noted.
9. **Response:** We agree.
10. **Response:** Most important salmon predators are protected by federal laws.
11. **Response:** We agree.
12. **Response:** Comment noted.
13. **Response:** This is not consistent across all species. For example, the poorest measured coho returns occurred in 1960. See revised Chapters II and IV and revised Appendix B.
14. **Response:** We agree.
15. **Response:** See response to #2. Also see revised Chapters II and IV.
16. **Response:** It will not prevent continued effective sampling.
17. **Response:** See revised Chapter IV.
18. **Response:** See response to #10.
19. **Response:** See response to #10.
20. **Response:** Comment noted.
21. **Response:** We disagree. See also response to #2.
22. **Response:** Non-treaty commercial fishing is conducted pursuant to state laws.
23. **Response:** We disagree.
24. **Response:** We agree.
25. **Response:** See revised Chapter I.
26. **Response:** See response to #2.
27. **Response:** Beyond the scope of what we are trying to accomplish but see revised Appendix B.
28. **Response:** We disagree with respect to dams. See revised FEIS.
29. **Response:** We disagree but see revised Chapter IV.
30. **Response:** We agree that this needs to be given serious consideration in the future.
31. **Response:** We agree.
32. **Response:** No #32 comment.
33. **Response:** See revised FEIS.
34. **Response:** We do not understand the first comment. The only resident stocks that have been compiled in a formal report form are Dolly Varden and bull trout.
35. **Response:** We agree but do not understand the part ("i.e., seal = 100 fish)."
36. **Response:** See response to #10.
37. **Response:** We agree.
38. **Response:** See revised Chapter IV.
39. **Response:** We agree.

40. **Response:** Comment noted.
41. **Response:** We disagree. The same standard has been used for a number of years in steelhead management.
42. **Response:** We disagree.
43. **Response:** See response to #2.
44. **Response:** We disagree.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Tumwater

1. What's the problem, i.e., too many fish in Alaska?
2. Property rights an issue - should be required to raise salmon.
3. Better enforcement - especially commercials.
4. Each fisherman should have individual quota to catch own - length of season.
5. What do fish have to do to qualify as wild fish?
6. Why the concern for wild fish? Use hatcheries - fish are fish.
7. Hood Canal - Washington State conservancies raising wild salmon - concerned about 5th-6th year. What will WDFW do to protect these populations?
8. Why clip fish? Harvest hatchery fish at lower level too. Catch them at the hatchery.
9. We have habitat - let fish decide what good habitat is.
10. Are we taking into account, do we know how much natural predator (sea lion, birds) are taking?
11. Sportsman - the problem is the nets catching all the big fish, and most of the small ones.
12. What tells you net size has resulted in smaller fish, i.e. Alaska.
13. Isn't it myth - you will ever get wild fish back - with all the downs - not at the % you want - too much habitat lost to ever bring back wild fish.
14. Terminal fisheries - this is the only answer.
15. If you are using locally adapted stock, why do you need to manage as separate species - use acclimation ponds. Don't preclude this option.
16. Mass marking - not usually accepted - is so great why don't we have greater number of steelhead. Need to publicize this - demonstrate success.
17. Tribes get 50% - who is the bookkeeper?
18. Juanita Creek was decimated by the nets in the summer time.
19. Page 5 - tone is reduced harvest - will there be an equal decrease by the tribes?
20. Acknowledge relationship between harvest, habitat and hatcheries. So we manage habitat correctly - or in pink with harvest and hatchery. Especially when negotiating numbers in policy with tribes or other entities. Tailor habitat according to this.
21. If the tribes don't buy in - this is an exercise in futility.
22. Landowner - buffers on my land for fish - tree farmers do this - not Indians, not fair.
23. What order of magnitude do you want to invest in spawning escapement? How do we get the politicians to do this?
24. Lower Columbia - past management as stock management - look at tributaries (escapement needs) take into account before setting numbers for fisheries.
25. We got here by not distinguishing wild/hatchery fish.
26. Not necessary to wire code. ID by fluid in eye and cheek - save money.

27. Take into account ocean conditions, i.e., last few years were bad, but we continue to harvest.
28. Support eliminating net fisheries.
29. Eliminate catching all wild fish.
30. Please with Sam's presentation. Suitable approach.
31. This year no herring - no bait - taken by kelp and roe fishery (bycatch). Herring enhancement project needed.
32. Need more accurate counts of spawners.
33. Concerned about watershed council format - formal input/feedback. Need guidelines for councils - qualifications.
34. What is the target number of fish - caught, produced, spawners, ecological? Plan (WSP) doesn't specify how many resident stocks there are in this state.
35. Bycatch - fisherman should have to count everything in the net against their quota (i.e. seal = 100 fish),.
36. Control predators - predators lost their predators - i.e. seals.
37. I.D. model runs - that works.
38. Methods - gillnets - studies show high mortality (1968.70) only do we continue? Drop out is the problem.
39. Be accurate on bycatch counts and let the public know.
40. Willapa Bay - staggered seasons concentrates fishermen in open areas. Open all at once.
41. Selective fishery - you are over selling - when you say marking will avoid closures. Incidental catch rates exceed 10% - this is higher than allowed impact in Washington fisheries.
42. Return problems may correct themselves as fish farms become more prevalent; commercial pressure could be less.
43. How will tribal fisheries be managed? Are they bound to this?
44. Would like to see the finer populations be returned to historical population - The river capacity would consist of wild fish and the cultural fish would be allowed to raise the population to historical population.

Tumwater

1. **Response:** We do not understand this comment.
2. **Response:** We do not understand this comment.
3. **Response:** We agree that better enforcement is needed.
4. **Response:** This is a good approach that has been used successfully by other managers. It merits serious consideration in Washington.
5. **Response:** See revised Appendix A.
6. **Response:** We disagree.
7. **Response:** See revised Alternative 3.
8. **Response:** We disagree. See revised Chapter IV.
9. **Response:** They are doing so. See revised Appendix B.
10. **Response:** Yes.
11. **Response:** We disagree.
12. **Response:** Actual long-term records of fish sizes.
13. **Response:** We disagree.
14. **Response:** We disagree. See revised Chapter IV.
15. **Response:** We disagree. See revised Alternative 3 and revised Appendix E.
16. **Response:** Steelhead were not very abundant historically, at least as compared to the five species of Pacific salmon. Selective protection of wild fish did allow a number of Puget Sound steelhead runs to increase in recent years. See revised Chapter IV.
17. **Response:** Tribal fishing is conducted pursuant to federal laws.
18. **Response:** See revised Chapters II and IV.
19. **Response:** See response to #17.
20. **Response:** See revised FEIS, all sections.
21. **Response:** We disagree.
22. **Response:** Comment noted.
23. **Response:** See revised Alternative 3.
24. **Response:** We agree.
25. **Response:** We agree.
26. **Response:** We disagree in the context of currently available technology.
27. **Response:** We agree.
28. **Response:** We disagree.
29. **Response:** We disagree.
30. **Response:** Comment noted.
31. **Response:** This is beyond the scope of the current effort.
32. **Response:** We agree.
33. **Response:** Habitat comment noted.
34. **Response:** We do not understand the first sentence. Resident fish stock data have only been formally compiled for Dolly Varden and bull trout. See revised Chapter IV.
35. **Response:** We agree but do not understand the seal comment.
36. **Response:** Most or all important salmon predators are protected by federal laws. Their management cannot be addressed through the SEPA process.
37. **Response:** We agree.
38. **Response:** We agree but see revised Chapter IV.

39. **Response:** We agree.
40. **Response:** We agree and this proposal should be given serious consideration.
41. **Response:** We disagree.
42. **Response:** We disagree.
43. **Response:** See comment #17.
44. **Response:** This is the same conceptual approach that was tried in the past but failed.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Vancouver

1. Reinstate "stream watch" program.
2. Policy should prioritize the problems. What is most detrimental, what is the biggest size problem?
3. Who, or what takes the fish by percentage. Predators, fishers, other countries, states break it down, variety of predators.
4. Why hasn't summer-run on Washougal, also winter-run come back? Bottom line is public greed.
5. Concerned about marine mammal population? If we not' manage those, how will wild fish survive?
6. MSY-the only alternative that eliminates this is Alternative #2.
7. Any thought, of single fish limits, small annual limits, etc., on fall-run chinook on Lewis River or short seasons, only 1-2 weeks. Closer management.
8. Other predators - walleye, shad, heron - I fish in Alaska now, we should just close fishing in Washington - let the fish run!
9. Have studies of predation been done? They should be studied.
10. Fish wheels are a good system, but we mis-used it, abused them.
11. Willapa Bay - needs escapement objectives for wild fish.
12. Willapa - flood in March - that's why MSY is not enough.
13. Department needs more, better data to manage properly. In the past WDFW managed wrong, not conservative enough.
14. Landowner: When fish do come back, too many people on land fishing. Why not buy it at the store?
15. Stop the fishing - go after sea lions, seals, they are blocking the Cowlitz.
16. Concerned about seals - do you have data?
17. Seals are over-protected.
18. We spend money (CA, WA & ID) on salmon, then let the predators take them. Doesn't seem economically feasible to continue this.
19. 200 mile limit - do we know what fishing beyond this? The answer may lie out there. What % are we losing out there?
20. Hanford Reach - brights - all sorts of pressures - seals, poachers, still doing good. The habitat is protected. Wild fish are ok when we have left habitat and providing harvest for wildlife and user groups.
21. What are we doing with tribes?
22. Will WSP address trout?
23. How are we negotiating with Canadian purse seine fishery?

24. Terminal fisheries - for recreationists - more places like Big Arlus Lake. Look at doing more of these.
25. Look at old hatchery management. They didn't let all the fish go at the same time. One at a time reduced predation by birds, etc.
26. Need study to determine mortality from all sources, fishermen, predators, etc.

Vancouver

1. **Response:** We agree.
2. **Response:** We agree. See revised Chapters II and IV.
3. **Response:** This has already been done many times in a variety of formats and degrees of comprehensiveness.
4. **Response:** Comment noted.
5. **Response:** Marine mammals are managed by the federal government under federal laws. As such, society had recognized them as legitimate "users" of the salmonid resources. Their management cannot be addressed under the SEPA process.
6. **Response:** We disagree. See revised Chapters II and IV and revised Appendix D.
7. **Response:** This is outside the scope of the current effort.
8. **Response:** We disagree. Most important salmonid predators are protected by federal laws.
9. **Response:** Yes.
10. **Response:** We agree but see revised Chapter IV.
11. **Response:** We agree. See revised Chapters II and IV.
12. **Response:** MSY based on a spawner-recruit relationship accounts for environmental effects. See revised Chapters II and IV and revised Appendices B, D, and G.
13. **Response:** We agree.
14. **Response:** We disagree.
15. **Response:** We disagree. See response to #5.
16. **Response:** Yes. See response to #5.
17. **Response:** See response to #5.
18. **Response:** We disagree. See response to #8.
19. **Response:** High seas gill netting has been banned by international agreement. Existing trawl fisheries are closely monitored. (See detailed response to written comments.)
20. **Response:** We agree.
21. **Response:** See revised Chapter I.
22. **Response:** Yes.
23. **Response:** This is beyond the scope of this effort. International negotiations cannot be handled through a SEPA process.
24. **Response:** We agree.
25. **Response:** We generally agree but there is a great amount of existing disagreement regarding many specific practices (such as varied release times versus "predator swamping").
26. **Response:** See response to #3.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Walla Walla

1. Ceremonial/subsistence fishing nets in Columbia River when endangered?
2. Who decided that tribes report their own catches?
3. Will conservation benefit tribes' 50% share?
4. What effect would netting ban have on populations? Increase?
5. Who monitors tribal catch?
6. What is incidental catch?
7. Dams, high seas fisheries, ocean survival conditions affecting all populations.
8. Net block below John Day Dam; habitat not a real problem.
9. Why aren't problems with dams being fixed? (They're) the worst problems.
10. Do tribes have to have 50%? Are they just taking 50%?
11. What are sport selective fisheries? Start marking fish now.
12. If 1997 chinook are higher they are ESA protected and none should be harvested.
13. Sports fishers may have a hard time releasing listed fish if taken while legally fishing for other species.
14. If too much fishing, cut it off for three years.
15. Marking salmon good ideal only if fisheries can select.
16. Gill-netting not counting incidental catch toward tribal harvest.
17. "Fish are our clients" is upsetting to the public.
18. What's definition of hatchery and wild fish?
19. Four year moratorium (on fishing would) give great influx.
20. Controlled harvest after moratorium.
21. Hatchery fish don't count toward ESA goals.
22. Take hatchery dollars and pay commercial, tribal fishers not to fish.
23. Historical data all used? (Jim Chatter's work). Look at big picture. Change is constant.
24. Economic value of Columbia River fisheries? Bearing on harvest.
25. Predation on oceans? Russian, Japanese harvest?
26. Federal efforts to negotiate treaties with Canada. Economic pressure should be shared burden.
27. How will WDFW negotiate treaty harvest?
28. WDFW and Corps of Engineers work together for escapement.
29. Maximum sustained yield-isn't that a contradiction?
30. Why are we even talking about harvest of listed stocks in 1997?
31. Why are local landowners getting heat about habitat issues when we're harvesting listed stocks?
32. Why are Hanford Reach salmon doing so well?

Walla Walla

1. **Response:** Tribal fishing is conducted pursuant to federal laws.
2. **Response:** See response to #1.
3. **Response:** Definitely in any long-term perspective.
4. **Response:** See response to #1.
5. **Response:** See response to #1.
6. **Response:** See revised Appendix A.
7. **Response:** We agree with dams and ocean survival conditions but not high seas fisheries.
8. **Response:** We disagree that habitat is not a problem.
9. **Response:** This is completely out of our control except as "advisors."
10. **Response:** See response to #1.
11. **Response:** See revised Appendix A and revised Chapters II and IV.
12. **Response:** See response to #1.
13. **Response:** We disagree - see revised Chapters II and IV.
14. **Response:** We disagree. Many salmonid populations are still healthy and productive. See revised Chapter IV.
15. **Response:** We agree. See revised Chapter IV.
16. **Response:** We disagree. See response to #1.
17. **Response:** This term also elicited a great deal of public support.
18. **Response:** See revised Appendix A.
19. **Response:** See response to #14.
20. **Response:** See response to #14.
21. **Response:** This is generally true but there are exceptions. See revised Alternative 3.
22. **Response:** We disagree. See response to #1.
23. **Response:** We agree and try to use all available original data.
24. **Response:** This exercise has been done many times in a variety of formats. We did not see any compelling reason for doing it again in this process.
25. **Response:** Predation is an ongoing natural process. See response to #7.
26. **Response:** We agree but this is beyond the scope of what we are trying to accomplish.
27. **Response:** See response to #1.
28. **Response:** See response to #9.
29. **Response:** No. See revised Chapters II and IV and revised Appendices B and D.
30. **Response:** See response to #1.
31. **Response:** We believe that both habitat and harvest problems must be addressed and resolved.
32. **Response:** They have generally excellent conditions for spawning, egg incubation and freshwater juvenile rearing. In addition, ocean fishing rates have been reduced in recent years by both U.S. and Canadian fishermen. Favorable ocean survival conditions in the Gulf of Alaska also contributed as has continued maintenance of this population's genetic diversity.

Responses to Wild Salmonid Policy
Public Meeting Comments

Harvest

Wenatchee

1. How will marking gill-net mixed fishery happen?
2. Policy is being placed on the back of farmers, foresters, cattlemen, private property owners. Where is urban population? Can you get to the over-harvest issue?
3. How do you differentiate management in lower and upper Columbia River? We're afraid of losing our steelhead sport fishery. Concerned with how harvest management strategy comes out. Concerned with other predators in relation to harvest, like loons, seagulls, squawfish, seals, etc. (From Okanogan Fly Fishing Club Rep).
4. Canada says they will deplete our fishery to get their quota. Need net restrictions on one-mile radios of river outlets, like Canada and Alaska. Tribal fisheries need to be restricted. (From Wenatchee Sportsmen Association)
5. Do you have the science to know the pounds of fish being taken by gill-nets in the lower Columbia River? Don't understand why we have to distinguish between hatchery and wild fish.
6. Challenge wild vs. hatchery designation. Feel it is a social/political designation.
7. What is your definition of wild fish? It's different from Northwest Power Planning Council's which is different from Schmitten's, etc.
8. Clarify or provide definitions as identified by various agencies.
9. I'd like to see WDFW go along with the people to stop the ESA train.
10. Watershed councils are diverse in Okanogan County.
11. Use bait restrictions. A lot of intermediary steps to be taken before we stop fishing.
12. Need an educational program to explain fisheries management.
13. Let's protect free runs, not use them as a food source. Stop harvesting. Leave it to the fish farms, net pen rearing.
14. There are conflicts with international, tribal, advisory, NWPPC, and other groups. How is WDFW going to bring these together?
15. You need to notify legally-vested parties (about policy). Sometimes it's impossible to participate at the level we would like, but do you expect us to give up?
16. What's going on with the tribes? Are they in partnership with WDFW on harvest? Is their 50% related to their input from hatcheries?
17. Are you including fish taken by sea lions? Policy doesn't address this as a mitigation issue. Are we doing anything about that?
18. A lot of stream robbing by commercials moving into river mouths. Also boats that follow the shoreline affects the lower 48 states. All fisheries worldwide are overfished. Seems it would be wiser to minimize distinction between wild vs. hatchery. Pick the alternative that provides the most bulk and preserves the fishery.
19. It's important to save wild stock and there is a happy medium between hatchery and wild. Implement selective harvest and get the nets out of the river.

20. We've had hatchery fish introduced for more than 80 years. We've only been marking for 12 years. So what is a wild fish?
21. Flawed definition (of wild fish), and you are basing this policy on that definition. I don't like the game we're playing with wild fish. We need numbers.
22. Is WDFW marking all hatchery fish as a policy at this time? If not, they should be.
23. What does "holding the line on harvest" mean? What's in the plan to replace lost funds?
24. People who fish for a living are in business, and we are out of fish. We do need to make sacrifices.
25. For years we've been putting millions of fish in and runs are still going down. Are you saying wild fish will be different?
26. Is your emphasis on adult escapement vs. smolt escapement?
27. If you can control harvest, will you control the tribes?
28. How is the 50% (of catch) determined?
29. Are you regulating to the 200-mile mark?
30. If there were regulations for steelhead on the Methow River for catch-and-release, wouldn't it make sense to have the Columbia River mainstem catch-and-release as well? Would tribes fall under these regulations?
31. Would ESA be determined on wild, natural, hatchery or what if they are all the same species? I think you're falling into the ESA trap with mass marking.
32. ESA is arbitrary. Who decides at what time a fish is a wild fish when you keep diluting with hatchery fish?
33. Are salmon runs in trouble, or are wild salmon runs in trouble? What are the reasons?
34. What were the practices that WDFW participated in to reduce "wild" runs?
35. If you're talking about the big picture, you're talking about commercial fisheries.
36. Aren't current conditions in the ocean contributing to survival?
37. What about foreign fishing?
38. Even with the Canadians and tribes, you're not sure this plan is going to work.
39. Can I interpret you (WDFW) to say you would support a selective fisher vs. closure?

Wenatchee

1. **Response:** See revised Chapter IV.
2. **Response:** We disagree with the first statement. See revised Chapters III and V. The urban population is part of the problem and will have to be part of the solution. We can effectively address the over-harvest issue. See revised Chapters II and IV.
3. **Response:** See revised Chapters II and IV. With respect to predators, many of the important salmon predators are protected by federal laws. Detailed plans for their management could not be addressed through the SEPA process. Society has recognized these predators as legitimate "users" of the salmonid resources.
4. **Response:** The Canadians cannot overfish our salmonid populations without doing the same thing to their own. A recent publication by the American Fisheries Society shows that this has already happened (Slaney et al. 1996). We do not know if they will continue this strategy of fishing. Tribal fisheries are managed pursuant to federal laws.
5. **Response:** Yes. See revised Chapters II and IV.
6. **Response:** See revised Chapters II and IV.
7. **Response:** See revised Appendix A. Different definitions for the same terms already existed before we even started this current effort.
8. **Response:** See response #7.
9. **Response:** We agree.
10. **Response:** We agree.
11. **Response:** We agree. See revised Chapters II and IV.
12. **Response:** We agree.
13. **Response:** We disagree. See revised Chapters II and IV.
14. **Response:** By first establishing a clear, unambiguous agency policy.
15. **Response:** We have notified all interested parties. We did not expect or want anyone to "give-up".
16. **Response:** Tribal fisheries are managed pursuant to federal laws.
17. **Response:** See response to #3.
18. **Response:** We disagree. See revised Chapters II and IV.
19. **Response:** We partially agree but see response to #16.
20. **Response:** See revised Appendix A, revised Chapters II and IV, and revised Appendix E.
21. **Response:** See revised Chapters II and IV and revised Appendices A and B.
22. **Response:** Yes with respect to steelhead and sea-run cutthroat. Revised Alternative 3 expands use of this resource management tool.
23. **Response:** See revised Chapters II and IV.
24. **Response:** We agree.
25. **Response:** Yes. See revised Appendix B.
26. **Response:** This differs by species and the specific information available. See revised Appendix B.
27. **Response:** See response to #16.
28. **Response:** It is 50% of the harvestable surplus production from salmonid populations. This applies only to fish in excess of the spawning escapement requirement.
29. **Response:** No.

30. **Response:** Wild fish release would probably be more appropriate for the recreational fisheries. Also, see response to #16.
31. **Response:** The ESA definition is comparable to our definition of wild fish. See revised Appendix A. We disagree with the second statement. See revised Chapters II and IV.
32. **Response:** We generally disagree but these are not decisions which we have any control over.
33. **Response:** Both. See revised Chapters II and IV and revised Appendices B and F.
34. **Response:** See revised Chapters II and IV and revised Appendices B and F.
35. **Response:** We disagree.
36. **Response:** Yes
37. **Response:** High seas gill netting has been banned by international agreement. Existing trawl fisheries are closely monitored (see detailed response to written comments on this subject).
38. **Response:** Every element of Alternative 3 is something that has worked successfully for us and/or for another salmonid resource manager.
39. **Response:** Yes. See revised Chapter IV.

Responses to Wild Salmonid Policy
Public Meetings Comments

Harvest

Yakima

1. What is WDFW's definition of a wild salmonid?
2. International fishing catching too many Washington-bound salmon.
3. Gill nets have destroyed productive fisheries in the past (i.e. Grays Harbor).
4. There may be more support for total closures than WDFW thinks-four to five years.
5. Over half of the fisheries are below dams, so why are these populations declining?
6. Predator harvest not mentioned in document. Something needs to be done with predators-seals, sea lions, birds. Cormorants are too many, efficient predators.
7. Harvest is all catch. Habitat excludes ocean; ocean needs to be included in habitat.
8. Predator control is a waste of money and ecologically unsound and indefensible.
9. What are the cost-benefit ratios/issues between those who benefit from harvesting the fish and those negatively impacted through their land? Compare those that benefit from harvest of fish versus those that use habitat for uses other than producing fish.
10. No netting on river. Selectively harvest hatchery fish at Bonneville Dam. Don't harvest native fish!
11. Historically commercial fishermen have caught much more than sportsmen.
12. You are doing the same thing the department has done for 30 years. You are talking this issue to death. The fish are declining.
13. Account for "drop off" mortality.
14. Predation by sea lions, otters, seals. Marine Mammals Protection Act.
15. Human population pressures causing changes in animal populations, behavior, and depleted wildlife habitat.
16. No user groups should be exempt from policy. Equally shared conservation burden.
17. Better accounting of non-treaty catch and allocation sharing.
18. WDFW past harvest is a joke. More fish taken illegally than legally. Enforcement is one to 32,000. Need more enforcement.
19. Gill nets can't be fished selectively.
20. Very, very few fishermen taking too many fish from lower Bonneville.
21. How can WDFW allow net fishing in this day and age?
22. Why allow sportsmen to catch only hatchery fish?
23. Why is your definition of wild fish different than the definition of the Power Council? Whose definition are we using and for what purpose?
24. Supplementation projects not in place in 1997.
25. WSP is best thing agency has ever done.
26. Big game, pheasant game farms was garbage.
27. Contradictory statement on page 71: Need slot size limit like we have on walleye; have upper limit as well as lower limit.
28. Concerned about over-fishing on ocean by other countries. How can this be controlled?
29. Concerned about enlargement of riparian habitat. By enlarging wetlands, etc., and further

than protected areas now, higher densities of big raptors, etc. can cause problems for farmers.

30. Need statewide barbless hook for fishing.
31. Studies say no reduction in mortality with barbless hooks.
32. No bait restrictions.
33. Introduction of "exotic" species affecting native salmonid populations.
34. How can you measure harvest when fish buyers buy in case? Need better accounting. Fish should be used wisely-not wasted.
35. How will sportsmen by-catch be dealt with? Should be a way that is accounted for. WDFW needs a policy on this issue.

Yakima

1. **Response:** See revised Appendix A.
2. **Response:** With the exception of Canada, we disagree. High seas gill netting has been banned by international law and existing trawl fishing is closely monitored. (See detailed response to public written comments.)
3. **Response:** We disagree. There are still some healthy and productive salmonid populations and gill net fisheries in Grays Harbor.
4. **Response:** There has been a good deal of public support for total closures. However, we believe that Alternative 3 is a better choice in this point in time. See revised Chapters II and IV.
5. **Response:** Unfortunately, dams are not the only problem. See revised Chapters II, III, IV and V for additional problems.
6. **Response:** Predators are mentioned but specific management planning for them was beyond the scope of what we are trying to accomplish. Most or all important salmonid predators are protected by federal laws. As such, they cannot be addressed through the SEPA process. Society had recognized (through existing laws) that predators are a legitimate "user" of the salmonid resource.
7. **Response:** We agree. See revised Chapters II, III, IV and V plus revised Appendices B and G.
8. **Response:** We generally agree.
9. **Response:** This is beyond the scope of what we are trying to accomplish. This type of analysis would require too many assumptions to have any validity. See revised Chapter IV.
10. **Response:** Tribal fishing is conducted pursuant to federal laws.
11. **Response:** We agree.
12. **Response:** We disagree with the first two statements.
13. **Response:** We agree and plan to do so. See revised Alternative 3.
14. **Response:** See response to #6.
15. **Response:** We agree.
16. **Response:** We agree.
17. **Response:** We agree.
18. **Response:** We disagree with the first two statements.
19. **Response:** We agree generally but see revised Chapter IV.
20. **Response:** We disagree with both parts of the statement.
21. **Response:** See responses to #3 and #10.
22. **Response:** This is not the exclusive intention of revised Alternative 3. See also revised Chapter IV.
23. **Response:** There were already different definitions in existence before we even started this process. See revised Appendix A.
24. **Response:** Some continuing projects are "in place." We agree if this comment refers only to the Yakima River.
25. **Response:** Only time will tell.
26. **Response:** This has no relevance to the current effort.
27. **Response:** We have added slot limits as a new option in revised Alternative 3. However, managers should be cognizant of the following concerns expressed by Wright (1992, p.

525): "We did not use slot limits or other approaches (such as alternate-year closures or refuges) in our initial efforts, because most of our populations of resident trout and sea-run cutthroat trout were severely depressed. The one inherent danger with a slot limit is the uncertainty about whether adequate recruitment can be consistently achieved and sustained whenever a block of immature trout is subjected to consumptive harvest. A good monitoring program would be essential with this type of fishery. It is better suited for more productive waters with those species that are harder to catch. Brown trout in Wyoming are a good example. A future expectation of only a moderate annual fishing mortality rate is also essential."

28. **Response:** See response #2.
29. **Response:** Not a harvest issue.
30. **Response:** We generally agree.
31. **Response:** We disagree. The following summary is provided by Wright (1992, p. 523): "Adding restrictions requiring single hooks, barbless hooks, or flies can provide only relatively small incremental improvements in trout survival. However, managers have realized that these can become important in situations where individual fish are hooked many times. The chance of mortality from a single hooking event was examined for various unweighted combinations of terminal gear from our compilation of research results. The categories and single-event losses were as follows: Barbless hooks with flies, 1.76%; All barbless hooks (with flies or lures), 2.16%; Barbless hooks with lures, 3.00%; All hooks with flies, 3.34%; Barbed hooks with flies, 3.88%; All barbed hooks, 5.86%; All lures, 6.56%; Barbed hooks with lures, 6.86%."
32. **Response:** We disagree. The basic rationale is given by Wright (1992, p. 523): "A common management approach to directly control trout fishing mortality is a catch-and-release-only regulation. This is typically used in conjunction with a prohibition on the use of natural bait and often a requirement to use single barbless hooks or only fly-fishing gear. The intent is to lower, to the extent possible, the chance that exists for hooking or handling mortality each time an individual fish is hooked and released. The key element is a bait prohibition, because bait use can result in a 30-50% mortality rate per encounter. Thus, in an intensive fishery where individual fish can be hooked and released up to 10 times per year, allowing the use of bait is incompatible. However, in our analysis, we found that anatomical position of hooking was critical and that adult steelhead were seldom hooked in a critical injury area even when bait is used. Thus, a bait restriction is not essential, in most cases, for a successful catch-and-release fishery on adult steelhead (a notable exception would be summer-run steelhead, which are stressed by higher water temperatures). Restrictions on the use of bait are essential, however, for managing any trout population of multiple age-classes."
33. **Response:** We agree that this sometimes happens and needs to be addressed.
34. **Response:** We do not understand the "buy in case" term. All original buying transactions are on a whole fish basis. Harvest statistics come from these initial points of purchase. We agree with the last two sentences.
35. **Response:** See revised Alternative 3. We agree that it needs to be accounted for.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Aberdeen

1. Why did the agency turn their back on co-management (tribes) in relation to WSP. We were there with WSP - this is the ultimate insult.
2. There is a place for using fry plants - they are a good tool - you have to have purpose and longevity.
3. Instead of just numbers in the hatcheries - why not diversity - fish coming in at different times to sustain fisheries?
4. Most production hatcheries in Pacific County are geared for commercial harvest, there are other user groups out there. Need a more diverse production program.
5. Restore and maintain populations to a level that allows multiple harvest opportunities.
6. Is it important to know which fish are spawning in the North River?
7. Maintain present opportunity. Build on weak spots by using community. Maintain consistency in objectives and programs through changes in administration.
8. RSI's - what's the strategy for the future under WSP?
9. Credibility problem (with the department) you screwed it up - now we're supposed to trust you to fix it?
10. Process problems.
11. Former WDF caused constant readjustment with policy changes. The only thing I can support is Alternative #5.
12. Does WSP mean you will take all hatchery fish out so they won't spawn?
13. What's the long-term strategy for hatcheries under WSP?
14. Is there a genetic difference between a hatchery fish and "wild" fish?
15. Use wild broodstock for RSI's.
16. If you have a stream with a strong returning wild stock don't put any hatchery fish in, reduce interactions. Where there are weak returns - put in hatchery fish for harvest.
17. How are you going to distinguish between natural hatchery fish and delayed release? What will policy be in regard to delayed release fish? Salmon 2000?
18. If the object is to raise fish - do it - build the hatchery, fill the trays - clump fish everywhere.
19. If you want to save salmon - stop the harvest.
20. Take half of hatchery spawners the use the carcasses. The other half sell to support stream nutrient program.
21. What does it matter what off-spring comes back?
22. Not allowing more groups to do fisheries enhancement.
23. U.S. vs. Canada must be addressed if we wish to implement WSP.
24. Fish aren't getting past hatcheries to upper river - is this true?

Aberdeen

1. **Response:** WDFW continues to work with co-managers to achieve the goals of the WSP.
2. **Response:** Comment noted.
3. **Response:** Strategies will be developed in implementation plans with stakeholders.
4. **Response:** Comment noted. To be dealt with during implementation.
5. **Response:** This is a goal of the WSP.
6. **Response:** Yes. The presence of an abundant wild coho population in Willapa Bay was important to determine.
7. **Response:** Comment noted
8. **Response:** RSI's can be used for a variety of strategies under WSP, just like other cultured fish, if they follow the WSP criteria.
9. **Response:** Yes.
10. **Response:** Uncertain of comment.
11. **Response:** Comment noted.
12. **Response:** Hatchery fish that are intended to spawn in the wild (supplementation and valid spawners) will be allowed to spawn, efforts will be made to keep fish produced for harvest from spawning.
13. **Response:** Make them more compatible with wild fish management.
14. **Response:** A hatchery selects for and allows fish to survive that would die in the wild and fish that would survive in the wild perish in the hatchery. The amount of difference depends on the culture history.
15. **Response:** This is a potential strategy, for specific situations implementation plans will be developed with stakeholders.
16. **Response:** Comment noted. Strategies will be developed in implementation plans with stakeholders.
17. **Response:** Other stock identification tools could be used such as otolith or scale pattern analysis. Delayed release will have to follow ecological and genetic provisions of the WSP, but these should not markedly affect the current program.
18. **Response:** This is not a valid strategy in the WSP.
19. **Response:** Comment noted.
20. **Response:** Comment noted.
21. **Response:** They need to be able to reproduce successfully.
22. **Response:** The WSP does not set a limit on such groups.
23. **Response:** Additional fish from lowered Canadian harvests will speed recovery, but it is not necessary for implementation.
24. **Response:** In a few cases hatcheries have weirs that block upstream migration.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Bellingham

1. What does it take to have a genetically viable population?
2. How long does it take a transferred stock to adapt?
3. Why do we have a problem with the hatchery fish (too many) in relation to wild?
4. I'd like to see an experimental change within the hatchery program to take a genetic sample to the hatchery, raise them in a controlled environment and then release them right away (don't feed them).
5. Do you still plan to release farm-raised fish or can we get to what is addressed in Alternative #2?
6. How narrowly are you going to define watershed?
7. Recommend use only local broodstock in a drainage.
8. We don't release fish right away because of flooding.
9. What is WDFW's policy on continued cuts to the hatchery program? Does the department plan to use selective breeding at hatcheries?
10. How much yield do you get?
11. Will you have on-site coding, testing?
12. It seems to me WDFW has a problem with the Hoodsport chum run up here.
13. Money numbers on roe sales (what are they)?
14. Maritime Market program on hatchery education - a lot of talk about sales and profits - is that what we should be teaching?
15. Reverse incentives when they turn hatcheries into profit centers. To turn the corner we need to look at policies. Not one dime for sale of fish carcasses or eggs should go to the general fund - should go to charities.
16. I'm getting the impression hatcheries have decreased the gene pool (best stock). Can hatcheries be used to develop/strengthen stocks?
17. Has WDFW done anything on artificial spawning beds like British Columbia?
18. Restricting fish egg transfers is a lousy way to state it. Will WSP deal only with department hatcheries or with other entities that may purchase eggs and transfer them?
19. Where are you going to get gene pool that is biologically sound?
20. What are the arguments against delayed release and who (groups) are against it?
21. Do you have any information on cost per hatchery fish harvested?
22. How long are chum reared?
23. You only have half the information you need to determine gene flow if hatchery fish are spawning in the wild.
24. If we change to local brood on the Skagit how will we know them ?
25. Remove hatcheries and use money to maintain habitat.
26. Locally operated hatchery type enhancement (schools, regional groups).
27. Perception local hatcheries were in competition with the state.
28. Do you know the success of the Kendall Hatchery? Large rear-release ponds.

29. How much money has been spent on hatcheries? I'm advocating no hatcheries - they are a failed fix.
30. In farm fishing what happens when a pen breaks? Do they breed with wild fish? What about the chum eggs we sell?
31. Support Alternative #2 for hatcheries - on harvest err on the side of conservation. Emphasis needs to be placed on abundant spawning wild salmon and harvest is done after that is met.
32. Why is there so much emphasis on hatcheries vs. rearing channels?
33. Would it be more economical to go with artificial channels?

Bellingham

1. **Response:** One that replaces itself.
2. **Response:** Depends on the specific situation.
3. **Response:** Some of the major problems are that wild fish are harvested at unsustainable rates in order to catch hatchery fish, hatchery fish are counted for escapement but may not be valid spawners, and they interbreed with wild fish, lowering the wild stock productivity.
4. **Response:** Unfed fry releases generally have poor survival.
5. **Response:** Hatcheries will continue to exist in the WSP.
6. **Response:** See revised Chapter III.
7. **Response:** This is emphasized in the WSP.
8. **Response:** Fish not held in freshwater the proper amount of time will perish.
9. **Response:** Outside the scope of this EIS. Selective breeding could be part of an implementation plan.
10. **Response:** Uncertain of question.
11. **Response:** CWT's can be detected on site, dissected, and decoded.
12. **Response:** The WSP would emphasize the use of local stocks for culture.
13. **Response:** Contact the Hatchery Program
14. **Response:** Outside scope of this EIS.
15. **Response:** Comment noted. Carcass sale money goes to volunteer enhancement groups.
16. **Response:** Yes.
17. **Response:** Not like they use for sockeye.
18. **Response:** WDFW controls the programs for which it supplies eggs. Other entities will be encouraged to follow the WSP.
19. **Response:** Most wild gene pools are biologically sound.
20. **Response:** There is concerns about competition for food and predation.
21. **Response:** No. This varies by species, facility and year.
22. **Response:** Some are released as soon as they hatch as unfed fry, others are fed for about a month.
23. **Response:** We can determine if they are successful spawners by examining the genetics of the wild population.
24. **Response:** They can be marked by a variety of marks, adipose clips, scale patterns, otoliths, etc.
25. **Response:** Comment noted.
26. **Response:** These programs can be very useful in implementing the WSP.
27. **Response:** No. WDFW wants to work together with others to implement the WSP.
28. **Response:** Contact the Regional Fish Biologist.
29. **Response:** Contact the Hatcheries Program for this information.
30. **Response:** Atlantic salmon do not breed with native salmonids. WDFW has a priority plan for egg sales.
31. **Response:** Comment noted.
32. **Response:** Because coho, steelhead, and chinook do best in hatcheries.
33. **Response:** These only work for mass spawning fish such as pinks, chums, and sockeye.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Port Angeles

1. Does WDFW distinguish between hatcheries and broodstock?
2. Quilcene Hatchery has an electric weir that doesn't allow wild fish to go upstream because they don't want to contaminate hatchery fish.
3. Have a hard time supporting habitat restoration.
4. Is there anything in the hatchery - program to help produce a more robust hatchery fish to week out weak stock before its released?
5. Bottom line - keep the gene pool pure. Would like to see it implemented in Bogachiel and Solduc.
6. When we talk about keeping a clear genetic pool - with strays are we causing/adding genetic diversity which helps prevent inbreeding.
7. I think the idea of using local eggs to supplement local runs is a good idea.
8. Alaska has a successful private, non-profit hatchery program - this is a model that needs to be looked at. WDFW needs to assist non-profit/private hatchery efforts. Ability to distinquish between DNA is unreliable. Stocks are not accurate (as stated by D. Stone/L. Stern - electrophoresis).
9. Do you envision WDFW will continue to produce blackmouth for Puget Sound under this policy? Would you answer the same way for put-and-take fisheries on the eastside?
10. Where do you draw the line between which hatchery fish will be marked?
11. Raise more wild fish in hatcheries.
12. How can hatcheries reverse low return trend?
13. Do you envision abandoning raceways and managing watersheds as natural hatcheries?
14. McDonald Creek used to have a nice run of steelhead, silvers, is there any plan to do work there? A lot of money has been wasted on Bell Creek.
15. Sounds like McDonald Creek is a good candidate/opportunity for regional/local enhancement. Get together with local watershed groups.
16. No examples of ramifications to hatchery production. Will we see a shift in production? Will WDFW identify these production levels?
17. Hatchery zone management refers to Lower Columbia and Willapa?
18. Social/economical/biological benefit since we are mixing and matching on our definition of "wild." Need to be clear in document - watershed-by-watershed analysis.
19. Selective harvest saves wild fish.
20. Need to get rid of exotics (Skamania summer SH, hybrid chinook on Solduc) doing natives some real damage. Should be discontinued.
21. Genetic conservation in this document. We are judging stocks as they are now. Should be aspiring to what these stocks were.
22. Appendix on hatcheries - avoids a lot of literature out there, need to identify this for layman. RSI's why and where they didn't work - where they did and why.
23. Any plans to i.d. troubled stocks or will they be weeded out?

24. On early stocks - most important, most go upstream, least degraded - utilize stock rebuilding programs in high basin habitat.
25. Why do you think hatchery fish are competing with natives?
26. On the peninsula - hatchery fish only go so far - no habitat problem, problem is with the spawning grounds. Removal of hatchery fish removes buffer to natives and puts more pressure on (natives).
27. Are you going to back off RSI, does that what "allow only smolt releases of anadromous fish" means?
28. You talk about fin clipping. I thought the tribes knocked that off. What about Canada?
29. What is annual cost to run a hatchery?
30. What is the annual budget for the hatchery program?
31. How much money comes from power companies?
32. Do you have a stream assessment program to evaluate dwindling stocks in small streams?
33. Why did Issaquah receive 3 million and what are they rearing?
34. Will there be an agreement between state and feds to mass mark?
35. Snider Creek Hatchery - is there any movement to have them harvested as wild rather than hatchery fish? Are there other hatcheries doing the same thing?
36. In the 70's the hatcheries moved downstream, not allowing fish to go upstream, that was the decline of the salmon. Has the program changed? Are they putting carcasses in rivers? Allowing fish to get upstream?
37. How long will it take WDFW to mass mark chinook and coho?
38. Are we doing research into smolt interaction?
39. How long (with all this technology) before we get to go out and catch six (fish) a day?
40. What have you done with captive brood program? Are you going to utilize it here?
41. Is there a review of cost per smolt? Cost per return (in relation to programmatic review)?
42. Are you going to mass mark in saltwater? What about hooking mortality? Target to freshwater.
43. What have you learned from counting station at Snow Creek?
44. Re-evaluate Snider Creek steelhead program for run replacement.
45. Put salmon carcasses back into originating tributaries to supplement nutrient levels.
46. Will delayed release four chinook continue under WSP?
47. Will there be CWTs with adipose clips?
48. How can we consider hatchery fish when over the long-run they are not viable? Harvest allocation allows 90% harvest of hatchery fish which allows 90% of harvest on wild which run with them.

PORT ANGELES

1. **Response:** See revised Appendix E in FEIS.
2. **Response:** Comment noted.
3. **Response:** Please review habitat sections of the FEIS.
4. **Response:** Moving towards creating locally-adapted broodstocks for our hatchery programs, and low level infusion of wild genes into cultured stocks will help.
5. **Response:** Comment noted.
6. **Response:** Also causes outbreeding depression which lowers productivity.
7. **Response:** So do we, comment noted.
8. **Response:** 1st comment noted. DNA-based stock ID is accurate and reliable for determining mixed-fishery compositions.
9. **Response:** Answers to these questions are embodied in revised Appendix A of the FEIS.
10. **Response:** The proposed policy could call for all cultured salmoids to be marked.
11. **Response:** Comment noted.
12. **Response:** Strategies are currently being evaluated to reverse this trend.
13. **Response:** The goal of supplementation hatcheries is to be so successful that they are no longer necessary. Fishery augmentation/mitigation facilities will likely always be used.
14. **Response:** Such direction would be made through watershed council planning.
15. **Response:** Same as above.
16. **Response:** Questions are beyond the scope of this effort.
17. **Response:** Yes, as well as many areas within Puget Sound.
18. **Response:** Comment noted.
19. **Response:** We agree, and much of the focus of the FEIS is based on that principle .
20. **Response:** Comment noted.
21. **Response:** Goal for wild stocks is to create conditions for natural patterns of genetic diversity to reestablish.
22. **Response:** Questions are beyond the scope of the present effort.
23. **Response:** Goal of the WSP is to prevent any stock from going extinct.
24. **Response:** Comment noted.
25. **Response:** Evidence from scientific studies by WDFW and others.
26. **Response:** Comment noted.
27. **Response:** See detailed response to written comments for Fish Population Management Elements.
28. **Response:** See detailed response to written comments for Fish Population Management Elements.
29. **Response:** See detailed response to written comments for Fish Population Management Elements.
30. **Response:** The question is beyond the scope of this effort.
31. **Response:** Same as above.
32. **Response:** WDFW stock assessment evaluates many small streams and tributaries.
33. **Response:** Question is beyond the scope of this FEIS.
34. **Response:** See detailed response to written comments for Fish Population Management Elements.
35. **Response:** Ask the Regional Fish Biologist. Not at this time, this is a potential implementing strategy.

36. **Response:** See revised Alternative 3 in FEIS.
37. **Response:** Unknown at this point, funding will be a factor in the implementation schedule.
38. **Response:** Yes, studies are ongoing in the Yakima Basin and the Elochoman River.
39. **Response:** Already can catch and release and keep six jacks in many streams.
40. **Response:** Such actions would be discussed at a watershed and Regional level.
41. **Response:** See detailed response to written comments for Fish Population Management Elements.
42. **Response:** Question beyond the scope of the FEIS.
43. **Response:** Speak to the Regional Fish Biologist.
44. **Response:** Comment noted.
45. **Response:** Projects are underway to accomplish this.
46. **Response:** As long as negative interactions with wild species are not significant. There are studies already underway to examine this and nothing negative has been observed to date.
47. **Response:** No. Most of the clipped fish will not have a CWT.
48. **Response:** Hatcheries can be viable in the long-run. The WSP recommends a combination of fisheries, some selective, to lower the harvest rates on wild stocks to acceptable levels.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Seattle

1. Is it possible for Washington State to cease all hatchery production? For legislature to cut all monies to hatcheries?
2. Can we start developing (steelhead and salmon runs) coming back to hatcheries? Crowded fishing since all runs coming back at the same time. Can we change the way runs come back?
3. How many years have we been propagating fish in hatcheries? How many of these fish have gone wild? When was the first hatchery established in Washington?
4. Give definition of "native" and "wild."
5. You know genetic origin of all hatchery fish?
6. Can you summarize the effect Alternative #3 will have on the operation of hatcheries?
7. What percent of hatchery fish are presently marked? What will it cost to mark all?
8. Do we have to worry about Atlantic salmon escaping net pens? How does WSP address this?
9. I like Alternative #3 - but I've added caveats. I'd like to see at least two times the fish we are getting today. Can we increase hatchery fish without impacting wild?
10. On population you manage I assume hatcheries use a lot of money. To what extent will you be focusing on productivity? Has WDFW looked at spawning channels as a natural form of rearing? Where will you get the most bang for your buck?
11. Doesn't it make sense to put our financial resources towards wild fish and developing wild fish enhancement?
12. You're oversimplifying the issue of locally adapted broodstocks. Concern for interbreeding between hatchery and wild fish and impacts on genetic fitness.
13. Do you look at cost per returning adult fish?
14. Do all entities that run hatcheries (i.e., tribal/federal/etc.) have to follow same guidelines (i.e. mass marking)?
15. Return rate at Piper's Creek has been outstanding - I can't say enough good things about WDFW support.
16. Are we out competing wild fish (chum)? Are we evaluating this against threatened stocks?
17. Are hatchery fish decreasing genetic diversity?
18. Would like to see annual broodstocks in hatchery reviews. Broodstock based on hatchery fish.
19. What's the limit (10,000) 10% of hatchery fish intermingling with wild fish? No precise determination for the 10%?
20. Is WDFW willing to reduce hatchery output to protect "wild" fish?
21. Can we clip sockeye? How does WSP relate to that?
22. Will we get a return to 100 pound chinook if other factors (i.e. dams) are taken care of?

23. What steps are you taking to minimize genetic impacts of hatchery fish on "wild?"
24. Are there any other new hatcheries planned other than (Green, Cedar, Yakima)? What are future plans for new hatcheries?
25. What kind of handle does state have on classroom sponsored RSI's? Are RSI's positive or negative?
26. How can you justify release of hatchery smolts when we know they cause damage to wild runs?
27. Are mitigation hatcheries subject to WSP?
28. I would like to see a policy that puts hatcheries out of business - manage for wild.
29. When you conduct programmatic review I want to see a cost/benefit analysis. How much does it cost to keep hatcheries running?
30. Does WSP call for a shift in biomass production to genetic diversity?
31. If hatcheries are the answer, what's the problem? Our stocks are still declining.
32. What are you doing to keep hatchery disease (i.e. whirling disease) from wild fish? Is this also done with Atlantic salmon?
33. Historically you've mixed stocks - is this diluting stocks? What is future plan for hatchery practice?
34. Is there any danger of Atlantic salmon establishing themselves?
35. If you've lost all natives in a watershed can you come back with a hatchery stock that would adapt?
36. Is it practical to manage hatchery releases to offset predation (i.e. cormorants, pelicans)?
37. Does the last bullet - restricting egg transfers apply to schools, volunteer programs, etc.
38. How does marking hatchery fish in commingled fishery protect wild fish in a gillnet?
39. If the salmon is your client go to terminal fisheries.
40. Education for people regarding ownership of salmon. More education and opportunity for volunteers. I think it is the only hope for this policy.
41. We can't replace something that is naturally wild. It scares me to think people will think cloning is the answer.
42. When a hatchery is not economically sound, it should be closed and money used elsewhere (i.e. pro hatcheries, habitat, enforcement).
43. Exotic - any species not native to Washington (what is definition)?
44. Does WSP address physical effects of hatchery production on immediate environment? Habitat?
45. Why do we raise and release all those chum?
46. Has WDFW done any ecosystem assessment as part of basin planning?

Seattle

1. **Response:** See detailed response to written comments for Fish Population Management Elements.
2. **Response:** These are goals of implementation strategies.
3. **Response:** See revised Chapter I of FEIS.
4. **Response:** See revised Appendix A.
5. **Response:** We know the ancestry of all hatchery strains.
6. **Response:** See revised Chapter IV of the FEIS.
7. **Response:** Beyond the scope of this work effort.
8. **Response:** Not as far as interbreeding with native salmonids. No successful breeding in the wild so far. Ecological interactions and disease are concerns. Priority is given to native species.
9. **Response:** In some areas, yes. Implementation work will determine where.
10. **Response:** Studies have and still are focusing on how to make hatcheries more productive.
11. **Response:** See detailed response to written comments for Fish Population Management Elements.
12. **Response:** Comment noted.
13. **Response:** See detailed response to written comments for Fish Population Management Elements.
14. **Response:** See detailed response to written comments for Fish Population Management Elements.
15. **Response:** Comment noted
16. **Response:** This is a concern in Hood Canal. Stock assessment and genetic studies have not identified large-scale impacts.
17. **Response:** In some locations they have decreased diversity among stocks, but not widespread. Within stock diversity has not been diminished.
18. **Response:** Comment noted.
19. **Response:** The gene flow element has a limit of 10% of the fish in a spawning stock that can be hatchery origin.
20. **Response:** Yes, if it is the most appropriate option for a hatchery/wild stock conflict situation.
21. **Response:** Yes, revised Alternative3 in the FEIS has provisions to deal with all cultured salmonid species on a case-by-case basis.
22. **Response:** Not if high ocean harvest rates on wild stocks continue. Genetically it is possible.
23. **Response:** Timing, location, imprinting, and selective fisheries are all strategies. See FEIS for discussion.
24. **Response:** See detailed response to written comments for Fish Population Management Elements.
25. **Response:** See detailed response to written comments for Fish Population Management Elements.
26. **Response:** Comment noted.
27. **Response:** Yes, as would most fish rearing facilities in the state through co-management agreements.

28. **Response:** Comment noted, see detailed response to written comments for Fish Population Management Elements.
29. **Response:** See detailed response to written comments for Fish Population Management Elements.
30. **Response:** The primary purpose for some hatcheries will shift to recovery, but the WSP aims to control adverse interactions, not end biomass production.
31. **Response:** Comment noted.
32. **Response:** WDFW, Federal Gov., Tribes, and private growers have strict fish health protocols. Whirling disease is a freshwater disease that would not be spread by marine net-pen fish.
33. **Response:** See revised Chapter I in FEIS.
34. **Response:** The potential exists.
35. **Response:** Yes, by introducing a genetically similar fish from an adjacent watershed.
36. **Response:** This is done as part of normal hatchery operations.
37. **Response:** Yes, it covers all transfers, but would be evaluated on a case-by-case basis.
38. **Response:** Selective fisheries using gillnets would use time/area features. See revised Chapter IV of FEIS.
39. **Response:** Comment noted.
40. **Response:** We agree.
41. **Response:** Comment noted.
42. **Response:** Comment noted.
43. **Response:** See revised Appendix A in FEIS.
44. **Response:** See revised Appendix F.
45. **Response:** Question beyond the scope of this document.
46. **Response:** See responses in habitat sections of the FEIS.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Spokane

1. Are there genetic differences between hatchery and wild fish?
2. Why triploid in Puget Sound?
3. Duplicate natural conditions.
4. Would hatchery at Lyons Ferry be closed? Is that the goal of this policy? Would like to see wild fish there.
4. Agree (about wild fish), but don't cut back hatchery production; i.e. Puget Sound Enhancement Program.
5. Find a way to keep hatchery fish coming, but don't impact wild fish.
6. Need hatcheries to bring back wild fish; i.e., RSI's.
7. Is there a real difference between hatchery and wild fish?
8. Don't wild fish improve the gene pool?
9. Not convinced of cost effectiveness.
10. Need better fish passage on Grand Coulee.
11. The problem with Grand Coulee Dam and up on Spokane River is no fish ladders or culverts.
12. Are state and federal hatcheries coordinated? Work together!
13. Will more or less fish be raised?
14. Harvest 50% of run, no more; watch unaccounted poaching.
15. Take broodstock at Bonneville.
16. State behind feds in endangered species act.
17. What are some problems with hatchery fish affecting wild fish?
18. Management of eastern brook trout - do something about past practices. Can be moved around.
19. Hatchery fish have same instincts.
20. How long does it take a hatchery fish to go to the ocean?
21. Hatchery fish not replacement for wild fish.
22. Prevent behavioral changes in hatchery fish.
23. Create more free flowing water, like Hanford Reach, by releasing dams.

Spokane

1. **Response:** See revised Chapter II and revised Appendix E in the FEIS.
2. **Response:** These fish are part of an experimental strategy to reduce genetic interaction between hatchery and wild fish.
3. **Response:** See detailed response to written comments for Fish Population Management Elements.
4. **Response:** Beyond the scope of our current effort.
5. **Response:** See detailed response to written comments for Fish Population Management Elements.
6. **Response:** Same as above.
7. **Response:** See detailed response to written comments for Fish Population Management Elements.
8. **Response:** See revised Chapter II and revised Appendix E in the FEIS.
9. **Response:** They can serve as a source of genetic variation for hatchery strains.
10. **Response:** See detailed response to written comments for Fish Population Management Elements.
11. **Response:** Comment noted.
12. **Response:** Beyond the scope of the present effort.
13. **Response:** Yes.
14. **Response:** Not predictable. WDFW will strive to raise better fish, with a greater return to fishers.
15. **Response:** Comment noted.
16. **Response:** Beyond the scope of the present effort.
17. **Response:** Comment noted.
18. **Response:** See the FEIS and National Research Council (1996).
19. **Response:** See the FEIS and revised Appendix E.
20. **Response:** Correct.
21. **Response:** Migration times are variable depending on distance and species.
22. **Response:** Comment noted.
23. **Response:** See detailed response to written comments for Fish Population Management Elements.
24. **Response:** Comment noted.

Responses to Wild Salmonid Policy Public Meeting Comments

Hatcheries

Tacoma

1. Why did WDFW select Alternative #3? Needs more explanation as to degree of difference between Alternative #2 and #3. How will mass marking interfere with CWT?
2. Does agreement with tribes include chum, pinks?
3. Definition of "wild" fish? Your definition should allow Larry Peck to grow as many fish as he wants and the next generation is wild and our problems are solved.
4. Wild coho have a much darker section (below ears) in the jaw than hatchery fish. You can recognize a wild fish, it takes time.
5. How many streams in this state have not had gene pollution?
6. Is the agency, as a result of WSP, going to see a reduction in number of fish produced in hatcheries?
7. On some rivers hatchery fish have taken over - others genetic profile is pure - is that one of the things you will look at under a programmatic review?
8. On WSP, are we only talking coho?
9. Has there been a look at the spawning rates - only spawning large fish so large fish come back?
10. If you spawn a jack you don't get all jacks do you?
11. Is there a way to enhance native fish spawning?
12. I read the state raises chum because they're cheaper - is that true? Would it continue under WSP?
13. Is this program (hatchery) modeled after a program that works?
14. Support Alternative #2 - gives us most sound scientific strategy - abandon MSY-we're in a different era.
15. I second everything (above). Problems with hatchery fish - with broodstock taking wild fish and putting them back in hatcheries. Survival goes down and then you're in the hatchery loop. Close Snider Creek hatchery. Why, when you have a healthy population - hatcheries aren't answering the problem - harvest and habitat is the answer.
16. If you have 110 years of hatchery production is it viable to say there is a "wild" fish? What have you done to the genetics over 110 years?
17. Would it be fair to say it's not the best fish (hatchery) to put out there? It's not healthy?
18. What's to say we can't give those fish back the genetic characteristics they had if we provide them what they need?
19. My problem with the new policy and agency is we spend a lot of money in the hatchery program. How much of wanting to save jobs (WDFW) is going to influence policy? If hatcheries are detrimental to wild fish populations, we need to stop hatchery production.
20. I'm a homeowner with 10 acres above Rocky Creek. Since Nov. '96, I have seen Rocky Creek silted up. A logger took trees within 100 feet of the bank. Two weeks later harvest was done, silted water was running from the forest wetlands into Rocky Creek. I'm happy to see Shanks propose this, but unless all agencies with jurisdiction coordinate and

work together this won't work.

21. Hatcheries are cultured fish that have not materially affected our wild fish. I believe hatchery fish are the salvation of the citizens of the state. No hatchery fish - no fisheries. I think we can double hatchery production, not harvest wild, and help reach capacity (rivers) with wild fish.
22. Hatcheries have been a problem for upper watershed management for wild fish. Can we correct this? We can't stop using habitat because of hatcheries - or hatcheries will have to go.
23. I encourage upstream use of habitat above hatcheries for wild fish.
24. Can support Vern's concern (above), but can we still seed the watershed and run the hatchery?
25. How do you determine the difference between hatchery broodstock and wild fish?
26. If you put wild broodstock into hatchery and then return them to the stream won't that pollute wild stock?
27. Increase daily limit of hatchery fish to discourage catch-and-kill of wild fish - also time, place and manner.
28. Do hatchery fish reproduce?
29. My perception is rivers, streams, etc. have a carrying capacity - has WDFW developed a vision of what type (priority) of fish will be managed for? In a natural situation you have a mix that will produce. How (with hatcheries) do you determine that mix and match?
30. When a fish is wiped out naturally - what happens to genetic diversity? There is emphasis being placed on specific strains - are we overemphasizing this?
31. Would hope hatcheries would support habitat - enough genetic flexibility if we have devoid habitat we can bring stock in.

Tacoma

1. **Response:** Alternative 3 allows for more harvest yet has sound management principals to recover and perpetuate wild reproducing fish.
2. **Response:** The elements of the FEIS cover all salmonid species.
3. **Response:** Comment noted.
4. **Response:** Comment noted.
5. **Response:** Only a few streams have stocks that have been genetically swamped by hatchery fish.
6. **Response:** See detailed response to written comments for Fish Population Management Elements.
7. **Response:** Yes.
8. **Response:** The elements of the FEIS cover all salmonid species.
9. **Response:** Selective breeding can be used to change cultured fish, but it has to be done carefully.
10. **Response:** No, both genetics and the environment determine if a fish will be a jack.
11. **Response:** Yes, through protection of existing habitat and by increasing our efforts to restore degraded habitat.
12. **Response:** Because chum are released soon after they hatch, they cost less to culture than species that are held longer. The WSP does not address this issue.
13. **Response:** Uncertain of program. Unable to answer.
14. **Response:** Comment is noted.
15. **Response:** Comment is noted.
16. **Response:** Most stock genetics are intact. See FEIS for more discussion.
17. **Response:** We disagree, see revised Appendix H and Impacts and Benefits of Alternative 3.
18. **Response:** Natural adaptation processes will bring back the genetic characteristics.
19. **Response:** See detailed response to written comments for Fish Population Management Elements.
20. **Response:** Comment noted.
21. **Response:** See detailed response to written comments for Fish Population Management Elements.
22. **Response:** See detailed response to written comments for Fish Population Management Elements.
23. **Response:** We agree, if fish health concerns can be managed.
24. **Response:** Yes.
25. **Response:** If the broodstock does not have a clipped fin, then other identification tools like scale pattern analysis or otolith banding could be used.
26. **Response:** That potential exists, but supplementation programs would be designed to minimize that risk.
27. **Response:** The FEIS calls for higher harvest rates on hatchery fish than wild stocks.
28. **Response:** Yes, however, their success is lower than locally-adapted wild spawners.
29. **Response:** Spawning protocols for salmon are to ensure random crossing.
30. **Response:** Successful natural colonization most likely occurs from nearby stocks, with similar diversity patterns, which then need to adapt.
31. **Response:** A major policy goal is to develop locally-adapted self-sustaining populations.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Tumwater

1. RSI's in Willapa Bay area - getting adequate number of eggs to volunteer groups; timeliness of egg delivery.
2. Willapa River appears to be cleaner, but seem to have fewer fish.
3. Cooperation with agency needs to be improved.
4. What "kind" of fish count in terms of fish accounted for on spawning grounds. Final definitions would appear to be very critical factor in implementation of policy and also outcome of ESA determination.
5. Do we have enough staff to adequately evaluate streams/projects for RSI egg supply, etc. Be responsive, and underutilized habitat problem.
6. Do we have "predator challenges" in hatchery rearing?
7. How is a hatchery fish inferior?
8. How prepared are we for implementation (August deadline). Aren't we already implementing some things (i.e. mass marking)?
9. Annual plants of steelhead in Hood Canal streams don't seem to survive to adult hood. Stream "nutrification" with salmon carcasses - is this being considered here?
10. How is mass marking of coho and chinook going to work with all the different harvesting practices that occur (different from steelhead)? Will it really be an effective technique?
11. Will spawner surveys be done adequately to assess numbers of hatchery vs. wild, - evaluate effects of mass marking practice?
12. Scale analysis for hatchery vs. wild - which species can you i.d.?
13. Need explanation for management decisions that are clear to the public (e.g. - why is "jack" limit "6"; how do you "tell" a hatchery fish)?
14. Can culture techniques be used to "improve hatchery fish?
15. Hatchery strategies: Separate stocks that are not interacting, or local broodstocks that won't "harm" wild stocks in interaction.
16. Best ways to us RSI's? Agency's ideas on this (how do we get the eggs?). Volunteer groups need help with this.
17. Agreement with Alternative #3 - but do we have to decrease hatchery populations?
18. Why are hatchery and wild to be treated as "separate species?"
19. Separation of hatchery and wild should be treated as a variable condition.
20. Hatchery fish that do spawn in the wild do provide benefits.
21. Spawning escapement numbers should come first, then divide up the remaining. Allow sport fishing in river (as in Alaska). Goal should be to get the fish back in the river to generate the public enthusiasm needed to support policies.
22. Spreading out effort of hatchery production into watershed - is it feasible?
23. Extent of predation by seals, birds; how large is this, can it be managed?
24. Raise more "wild" salmon (unclipped) in hatcheries.
25. How can/do we raise wild salmon in a hatchery?

26. Do we have these kinds of programs?
27. How can we enable volunteers/landowners to assist with restoration through “egg boxes”, other tools?
28. Do we have the capability to genetically i.d. fish returning that are the natural, local stock? And then use these for stock recovery?
29. What is going to be the state’s definition of a wild fish (vs. the NMFS definition)? How to protect true wild stocks from “feral” fish, i.e. fish whose parents were hatchery origin.
30. What are the impacts of delayed release program affecting survivability of wild fish in Puget Sound? This needs to measured or evaluated.
31. Have we evaluated cyclical nature of zooplankton populations (in Puget Sound) and also have we tried to time hatchery releases with these?
32. What are we doing about size declines in hatchery stocks?
33. Need to get our fish recovery, hatchery practices procedures worked out before impose land management rules/regulations.

Tumwater

1. **Response:** Question beyond the scope of this FEIS. Assistance from the WDFW Regional staff may be needed.
2. **Response:** Comment noted.
3. **Response:** This can be accomplished through the forming of watershed councils with representation from all affected parties within that basin or watershed.
4. **Response:** See FEIS "what counts" in revised Chapter II.
5. **Response:** Not at this time.
6. **Response:** No, "Predator Avoidance" experiments were conducted at several hatcheries in the late 50's and early 60's. The outcome showed no increase in survival to returning adults.
7. **Response:** Their survival and fitness in the wild are often less than wild fish.
8. **Response:** WDFW is prepared to start the implementation process whenever the Commission approves the WSP. We have not started to implement the policy. Specific components that will be used in implementation (such as mass marking) have been used in species such as steelhead with success and are experimentally being evaluated in coho.
9. **Response:** Contact the Regional Fish Biologist.
10. **Response:** Yes. A combination of fisheries, some selective, some not, will be used to create a lower harvest rate for wild stocks and keep fisheries open that would now be closed because of weak wild stocks.
11. **Response:** Yes.
12. **Response:** Coho, steelhead and spring chinook are the clearest because of extended rearing in the hatchery.
13. **Response:** Jack salmon escape saltwater sport and commercial fisheries because of small size, so more can be harvested in freshwater. A hatchery fish will have its adipose fin removed.
14. **Response:** Yes, fish health, nutrition, and genetics are currently being used to improve cultured fish.
15. **Response:** This is a goal of the WSP.
16. **Response:** The WSP preferred alternative recommends that WDFW work with local groups to develop strategies to benefit wild fish and support fisheries. RSI use would be developed as part of an implementation plan.
17. **Response:** No.
18. **Response:** So they can be harvested at different rates and controlled for spawning.
19. **Response:** Comment noted.
20. **Response:** They do provide nutrients, but they may not spawn successfully due to timing, location or genetics, and may lower the fitness of the wild stocks.
21. **Response:** This is a goal of the WSP.
22. **Response:** It will be difficult for some species that go far up tributaries.
23. **Response:** It can be very large. Refer to the FEIS for management.
24. **Response:** Comment noted.
25. **Response:** Through volunteer groups.
26. **Response:** Yes.
27. **Response:** Through existing WDFW programs.
28. **Response:** Yes, but other stock identification tools would also be used.

29. **Response:** WDFW wild fish is the same as NMFS "natural" fish. The gene flow criteria will control hatchery fish spawning in the wild.
30. **Response:** Studies are being conducted on this issue at this time.
31. **Response:** No.
32. **Response:** Strategies in the WSP would reduce fishery selectivity for size in hatchery broodstocks.
33. **Response:** Comment noted.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Vancouver

1. I support smolt only plants of hatchery fish. Reduce raring densities in hatcheries as per Carson National Fish Hatchery.
2. Why is there a problem having hatchery and wild fish? You need to have the goal of maximizing both. I don't see a provision for fish traps (in WSP) for all rivers.
3. If hatchery fish are genetically inferior - why do wild fish have trouble competing with them?
4. Jump start wild fish enhancement (native broodstock).
5. If you have hatcheries that are carrying disease can you cut production I half to help stop the spreading of disease and let wild fish pass?
6. Can you reconfigure hatchery focus to provide best support for wild runs?
7. Is it true hatchery smolts are genetically geared to smolt one year earlier?
8. Great run of steelhead in Salmon Creek because of net pens. Why don't we have more net pens?
9. Is it possible to raise fish in egg boxes?
10. I'm a landowner and I've wanted to get fish spawning on my property - I can' get help.
11. Are progeny of hatchery fish spawning in the wild considered "wild" fish?
12. The recovery package puts a lot of burden on the hatchery program. Has there been money designated to pay for it? To do WSP have they projected money for hatcheries to implement policy?
13. I think I heard Sam (Wright) say there are depressed wild stocks because of hatcheries - land owners end up having to make a lot of improvements when it seems its a hatchery problem. Decide what kind of fish to raise in a drainage and discussion (round table) with landowners/WDFW/etc.
14. I support prioritization of wild fish and I'm concerned about spending money on hatchery program vs. supporting wild. A lot of scientific information that says hatcheries impact wild fish.
15. By utilization of hatchery fish (local/native) you could maintain a wild stock. Is that true, or not?
16. One of the abuses from hatchery returns is the excess fish that are sold through GSA cheap. The public is paying for this. If they are surplus, give the public the opportunity to buy back what they paid for.
17. This region took 200 surplus steelhead carcasses and put them in a river for nutrient enhancement. Will you be doing more of this? Will you be monitoring it?
18. I heard there will be changes in steelhead management. You won't be planting certain areas - this is going to result in combat fishing.
19. Under WSP will you be switching some of the exotic hatchery populations to wild?
20. Why doesn't WDFW talk with old native (peoples) about how fish really used to be?
21. You say you're going to try and start getting natural broodstock to these streams. What

about streams that have lost this? Are you going to put hatchery fish there?

22. Washougal River fall salmon management - is there any plan to do something with this Mitchell Act hatchery?
23. Willapa Bay - chum have fallen out of favor with the Department because of pressure from tribes and commercials (because of their low value). Are we going to let chum die now? Naselle and Nemah hatcheries used to raise chum - now coho and chinook.
24. We've lost sea-run cutthroat here and Pat Trotter implies it is because of hatchery plants of other species.
25. Will WSP have control over what federal hatcheries produce?
26. Carson National Fish Hatchery dumped diseased fry into the Wind River despite WDFW opposition. Tighter controls on diseased fish.
27. Do you think the hatchery program will be able to expand off-site rearing programs?
28. Atlantic salmon farms are not a good idea.
29. How will mass marking be integrated with coded-wire tag program?
30. Any coordination with feds on mass marking in relation to Mitchell Act hatcheries?
31. Do we need to code all fish - or can we just adipose clip?
32. In regard to mass marking, are we only talking state facilities?
33. Where will funding come from for mass marking?
34. What percent of hatchery fish get back into streams?
35. On the Washougal River, no one knows how many hatchery fish are spawning with wild sea-run cutthroat. Are you going to monitor this?
36. Are you going to close down trout hatcheries?
37. Draft is too restrictive for volunteers to get involved. Remove nutrient evaluation enhancement from those restrictions.
38. How does WSP coordinate with NWPPC? How long will we put up with what they're doing?
39. We've got too many seals. More fish = fatter seals. They've been protected too long.
40. Same problem with sea lions in the Columbia River. They should be regulated. Are you going to address this in WSP?
41. I don't hear much about other countries harvesting in the ocean.
42. On genetic integrity I heard you want to address fish in their watersheds. They used to use Kalama stock - things have gone downhill. Can we use stocks from other watersheds?
43. As far as straying and trying to keep hatchery from wild - Sunset Falls on the Lewis River was dynamited. Are you going to try to keep hatchery fish from wild? Seems that exotics and predators are able to access areas that formerly only wild fish could get to.
44. What priority level will Cowlitz River get in reintroduction effort?
45. Is there a free interchange of data and cooperation between Alaska, Washington, Oregon and Canada?
46. If you don't get money for mass marking, will it limit hatchery production?
47. To what extent can WSP be made to pay for itself? Are you looking at that rather than looking to tax payers?

Vancouver

1. **Response:** Comment noted.
2. **Response:** See detailed response to written comments for Fish Population Management Elements.
3. **Response:** Primarily, it has been the high harvest rate coupled with the lower survival in freshwater while hatchery fish are protected by the hatchery. Interbreeding has also been a factor.
4. **Response:** See detailed response to written comments for Fish Population Management Elements.
5. **Response:** Actions and protocols to deal with diseases at hatcheries are outlined in the *Salmonid Disease Control Policy of the Fisheries Co-Managers of Washington State.*
6. **Response:** See detailed response to written comments for Fish Population Management Elements.
7. **Response:** Basically, no. The earlier spawn time is genetically controlled, but smolting in one year is mainly due to the feeding and water temperature in the hatchery.
8. **Response:** An acceptable strategy in some locations to create terminal fisheries for cultured fish.
9. **Response:** Generally not done.
10. **Response:** Help could be established through a watershed council or from a WDFW Regional office.
11. **Response:** Yes, see revised Appendix A in FEIS.
12. **Response:** Not as this time.
13. **Response:** Comment noted.
14. **Response:** Comment noted.
15. **Response:** This is one of the recommended uses for hatcheries under revised Alternative 3.
16. **Response:** Comment noted.
17. **Response:** Yes, the department has implemented a process to carry out this work state wide where suitable hatchery fish carcasses are available.
18. **Response:** Comment noted.
19. **Response:** To be determined by a program review and implementation work with stakeholders.
20. **Response:** Comment noted.
21. **Response:** If it is deemed appropriate under a formal recovery plan.
22. **Response:** Question beyond the scope of this document.
23. **Response:** Chum will continue to be managed for wild production. Implementation of WSP in this area could focus on increasing the harvestable numbers.
24. **Response:** Comment noted.
25. **Response:** See detailed response to written comments for Fish Population Management Elements.
26. **Response:** Comment noted.
27. **Response:** It is an acceptable strategy for managing cultured production.
28. **Response:** Comment noted.
29. **Response:** Portable tag detectors and group marking strategies have been developed to keep the fishery management uses of the CWT program intact.

30. **Response:** See detailed response to written comments for Fish Population Management Elements.
31. **Response:** Most fish will just be clipped.
32. **Response:** No. All production hatcheries will clip except as decided in implementation.
33. **Response:** Question beyond the scope of this document.
34. **Response:** Varies by program and depends on ocean survival and harvest pressure.
35. **Response:** Yes, this would be part of the implementation of the WSP
36. **Response:** That is not anticipated.
37. **Response:** Comment noted.
38. **Response:** See detailed response to written comments for Fish Population Management Elements.
39. **Response:** Comment noted.
40. **Response:** See revised Appendix F.
41. **Response:** High-seas driftnetting has been banned. Canada continues with high harvest rates in the ocean.
42. **Response:** Yes. See revised Alternative 3.
43. **Response:** The WSP handles these situations on a case-by-case basis and requires a risk assessment of the action on native species.
44. **Response:** Question beyond the scope of this document.
45. **Response:** Technical data is exchanged relatively freely and cooperative studies are common.
46. **Response:** The potential could exist in some cases.
47. **Response:** Even though a detailed analysis has not been done, and it may not be possible to predict all outcomes. The WSP should be beneficial to Washington taxpayers.

Hatcheries

Walla Walla

1. Concerned about hatchery closing.
2. Why are hatchery fish second-class citizens? It's worth the effort to preserve hatchery fish, too.
3. What's a "wild" fish? When brought into hatchery, wild or hatchery fish? Why is it necessary to separate wild and hatchery management?
4. Bring in fish from other places?
5. Put reservoirs in to keep water flowing.
6. Put in more hatcheries.
7. Why do we have to have salmon? Would ruin the economy.
8. Most of us have not seen this document, so how can we comment?
9. Prohibit planting hatchery salmon?
10. Trout fishermen are not catching salmon - that's a crock. Are you going to shut down whole rivers?
11. What is the purpose of this meeting?!
12. Have a formal public hearing.
13. Continue planting fish in Tucannon and Touchet.
14. There isn't enough money in the world to save salmon. Start managing people.
15. Should notify counties before putting out plan (Ordinance #219).
16. Don't trust WDFW to do anything except "preferred alternative."
17. Rearing techniques: two-year smolts.
18. Use hatcheries for salmon runs in general to help wild fish.
19. Why are you stocking predatory German brown trout on top of steelhead and bull trout?
20. Open up natural spawning grounds - lakes in upper watershed (i.e. Redfish in Idaho); otherwise hatchery spending is a waste. You have the authority, just do it.
21. Hatcheries have been a success putting fish for anglers in local rivers.
22. ESA coming down on us in agriculture, not counting hatchery fish.
23. Stop planting German brown trout in Touchet River; they're detrimental to anadromous fish.
24. Walleye at Ringold is in conflict with restoring salmon.
25. Has WDFW management caused demise of bull trout in Mill Creek?
26. Use hatcheries year around.
27. Concerned with hatchery cutbacks.

28. Better coordination needed between state and feds; not working well now at Ringold Springs.
29. How do you tell diseased wild fish for hatchery production?
30. Irony in calling hatchery salmon inferior when you can't tell the difference between wild and hatchery.

Walla Walla

1. **Response:** See detailed response to written comments for Fish Population Management Elements.
2. **Response:** See detailed response to written comments for Fish Population Management Elements.
3. **Response:** See revised Appendix A. One reason is that hatchery fish can often be harvested at a higher rate.
4. **Response:** We disagree. The use of locally-adapted broodstocks is the preferred option in Alternative 3 of the FEIS.
5. **Response:** This is beyond the scope of the current effort.
6. **Response:** Comment noted.
7. **Response:** See revised Chapter I of the FEIS.
8. **Response:** Comment noted.
9. **Response:** See detailed response to written comments for Fish Population Management Elements.
10. **Response:** Implementation will involve stakeholders to address this bycatch issue.
11. **Response:** Public information and public input to the process.
12. **Response:** We held two such hearings across the state.
13. **Response:** Comment noted.
14. **Response:** Comment noted.
15. **Response:** Comment noted.
16. **Response:** The FEIS has been modified through public input to the DEIS.
17. **Response:** Comment noted.
18. **Response:** See detailed response to written comments for Fish Population Management Elements.
19. **Response:** The WSP would stop this practice if negative interactions occurred.
20. **Response:** Comment noted.
21. **Response:** See detailed response to written comments for Fish Population Management Elements.
22. **Response:** Comment noted.
23. **Response:** See revised Chapters II and IV in FEIS.
24. **Response:** We disagree. This program will operate to fulfill a specific fishery need that will not conflict with sound recovery actions for wild salmonids.
25. **Response:** Check with the Regional Fish Biologist. The WSP gives a high priority to the management of native species.
26. **Response:** In most instances, this is the case. However, the Hatcheries Program review will point out any additional efficiencies that we can implement.
27. **Response:** See detailed response to written comments for Fish Population Management Elements.
28. **Response:** Comment noted.

29. **Response:** All fish, (wild or cultured) go through fish health screening under the guidelines in the *Salmonid Disease Control Policy of the Fisheries Co-Managers of Washington State* before their use in any culture programs (enhancement, recovery, gene banking, or supplementation).

30. **Response:** Where we have measured reproductive success in the wild and survival in the wild, naturally produced fish are higher. See revised Appendix E in the FEIS.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Wenatchee

1. Past performance doesn't create credibility. What's different in this policy?
2. What is this going to cost me? For example, in my orchard, with buffers on class four and five streams?
3. Problem with definition of wild fish. Usually they are really naturally produced fish, National Marine Fisheries Service definition.
4. Why not close down more commercial fisheries on the Columbia? Shut it down if fishery needs it.
5. Use NMFS definition of wild fish.
6. Get hatcheries up to a standard that they can produce "wild" fish, according to your own definition.
7. Do recovery with commercial environment.
8. Huge amount of money in hatcheries. Need more to watershed restoration. More natural systems would be better.
9. Agree that habitat is key, but some hatcheries are doing a good job, like Methow Hatchery.
10. Get USGS and National Oceanic and Atmospheric Resources Agency information on floods. Same number of floods today as before.
11. Net pen culture food fish and harvestable fish and leave wild fish alone.
12. Use hatcheries for seed source.
13. Is there going to be less hatchery production supplementation? Apply dollars to watershed restoration.
14. How many hatcheries closed in past 20 years? How many hatcheries on Columbia River? Need hatcheries.
15. Discouraging when hatcheries are closed and then hear fish are in trouble.
16. How can public have confidence now in hatcheries?
17. Don't think you are managing well.
18. Need more natural rearing fish.
19. Does WSP recognize RSI use?
20. Salmon is complex, so difficult to manage.
21. Problem with wild fish definition. What percentage of hatchery salmon spawn in the wild?
22. Concentrate on making hatchery and wild similar and don't separate hatchery and wild.

23. How much water is needed for wild salmon in mainstem Columbia River? Who will decide?
24. Marking fish is a must for success.
25. Appreciate WDFW coming here and this project.

Wenatchee

1. **Response:** Most actions are based on input from local watershed councils.
2. **Response:** See comments in habitat sections of FEIS.
3. **Response:** Same as NMFS "natural" fish. See revised Appendix E in FEIS.
4. **Response:** Comment noted.
5. **Response:** See response #3.
6. **Response:** See detailed response to written comments for Fish Population Management Elements.
7. **Response:** Comment noted.
8. **Response:** We agree, and much of revised Alternative 3 in the FEIS is aimed at achieving that.
9. **Response:** We agree, comment noted.
10. **Response:** Data does not support this statement.
11. **Response:** Comment noted.
12. **Response:** See detailed response to written comments for Fish Population Management Elements.
13. **Response:** See detailed response to written comments for Fish Population Management Elements.
14. **Response:** See detailed response to written comments for Fish Population Management Elements.
15. **Response:** Comment noted.
16. **Response:** Work with the WDFW and continue to evaluate.
17. **Response:** Comment noted.
18. **Response:** See detailed response to written comments for Fish Population Management Elements.
19. **Response:** See detailed response to written comments for Fish Population Management Elements.
20. **Response:** That is what makes this work challenging.
21. **Response:** See response #3. The percent varies by river and location. Near hatcheries it can be 100% to near zero in many stream sections.
22. **Response:** See detailed response to written comments for Fish Population Management Elements.
23. **Response:** See elements in habitat section of FEIS.
24. **Response:** We agree, comment is noted.
25. **Response:** Thank you for your support and interest.

Responses to Wild Salmonid Policy
Public Meeting Comments

Hatcheries

Yakima

1. What is percentage of hatchery vs. wild salmon and steelhead in local area of Yakima and Columbia rivers?
2. What percentage of chinook population in Yakima River is wild in last ten years?
3. Why wasn't survey made available?
4. What will we do with Yakima hatchery under Alternative #3?
5. Where are the coho coming from?
6. Why (was) state and federal constitutional law (not followed) to inform people not mailed (notices of meetings, etc.)?
7. What is stability of stocks in the Yakima River in the last 10 years? What will be considered satisfactory? Who determines that? How do you determine harvestable populations?
8. How do you know when you have excess? Are we monitoring these fish?
9. How many fish does it take to support fishery on the Hanford Reach? Is Hanford fully seeded? What's the number?
10. How and why can you say agriculture is a permanent clearcut? (Page 4)
11. Don't agree with policy definition of wild fish. Do you think there are some unique species?
12. In release from hatchery to stream, are they all released from one point or are they scatter-planted?
13. At hatchery level do you treat mitigation, restoring, enhancing, research the same?
14. Is mass marking problematic with millions of fish released?
15. Are state hatcheries required by law to mass mark?
16. What about Mitchell Act funding to mass mark? Did WDFW get money?
17. What effect will this state policy have on the feds (regarding mass marking)?
18. How is proposed bull trout listing affecting WSP?
19. What are historical numbers of bull trout? What are we shooting for?
20. On the Yakima project in Cle Elum, if this proves successful, is WDFW going to do this in other areas?
21. Would like to see hatcheries supplemental to habitat in the policy. Want to see change from the emphasis on hatcheries.
22. How long has barging been going on? How successful is it?
23. How would hatchery system be affected by a five-year moratorium on fishing? Seems it would phase them out.
24. What did we open our coastal fishery for?
25. Fish collectors at dams: good, bad, or indifferent? Keeps fish from getting in turbines.
26. General public needs education on fish populations. What education specifics (underway)? I & E has not sold department programs. Are you selling anything?
27. Confused about fish genetics. Seems we go to extraordinary lengths to maintain integrity.

28. What's the risk involved? What are you worried about if they are all the same?
29. How about fitness and survival?
30. What groups are releasing fish? Does the agency control fish they plant? For 30 years Yakima Steelheaders raised steelhead and planted them where they want. Have planting information from all groups - regional enhancement, private stocking, tribes, etc.
31. Why no sport fishery above Naselle Hatchery?

Yakima

1. **Response:** This is beyond the scope of the current effort, but information is available at the WDFW Regional office.
2. **Response:** See response #1.
3. **Response:** See response #1..
4. **Response:** See detailed response to written comments for Fish Population Management Elements. .
5. **Response:** See response #1.
6. **Response:** Beyond the scope of the current FEIS.
7. **Response:** See response # 1.
8. **Response:** All formal fish management plans have incorporated into them an element with specific monitoring and evaluation protocols to measure whether or not MSY is being achieved.
9. **Response:** Question is beyond the scope of this effort. Information on this subject is available at the WDFW Regional office.
10. **Response:** See response in habitat sections.
11. **Response:** Comment noted.
12. **Response:** It depends on the type of program being carried out. See detailed response to written comments for Fish Population Management Elements.
13. **Response:** Protocols and techniques may very across program types, however, their level of importance does not.
14. **Response:** Yes, but feasible with sound preplanning .
15. **Response:** No. However, to effectively manage cultured fish separately from wild fish it is our most appropriate management tool.
16. **Response:** This subject is beyond the scope of our current effort.
17. **Response:** See detailed response to written comments for Fish Population Management Elements.
18. **Response:** A bull trout management plan will be completed after this WSP is completed.
19. **Response:** Beyond the scope of the current effort. Information is available at WDFW Regional offices.
20. **Response:** The Yakima project is one of several such operations across the state. Should additional populations of wild fish fall to critically low levels, other hatchery programs could be modified to operate in this manner.
21. **Response:** Comment noted.
22. **Response:** Transportation appears to have increased the survival of fish in about half of the experiments conducted from 1968-1990 (ISG 1996).
23. **Response:** See detailed response to written comments for Fish Population Management Elements.
24. **Response:** See revised Chapters II and IV in the FEIS.
25. **Response:** Depends on the salmon species, size, and river flows (ISG 1996).
26. **Response:** Comment noted.
27. **Response:** The scientific consensus is that conserving genetic diversity and integrity is worth the effort.
28. **Response:** Monoculture is dangerous. When conditions change, everything fails.
29. **Response:** Where we have measured reproductive success in the wild and survival in the

wild, naturally produced fish are higher. See revised Appendix E in the FEIS.

30. **Response:** Beyond the scope of this effort. Information is available at WDFW Regional offices.

31. **Response:** See response #30.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Aberdeen

1. Timber industry involved for 15 years - no fish response. How much more can we give?
2. Concern over RMZ protection.
3. WFFA - Type 4 & 5 (3) RMZ proposals. Extreme hardship to small landowners.
4. Additional roading!!
5. Leave timber industry alone; watch returns from better harvest management.
6. Does WDFW have stream data; spawning, carrying capacity?
7. Commission needs additional representation (timber, agricultural, fishing industries).
8. Affected by I-45.
9. WSP should encompass implied/stated attempt to avoid ESA listings. Commission must support state-based management system -- not federal. Minimize impacts to landowners. Utilize watershed planning.
10. WSP in the TFW house WSP prescriptions do not match Washington prescriptions.
11. How will WSP prescription be reconciled in landscape planning for fish?
12. Concern over literature reference relative to the ground reality.
13. In era of splash dams and other forest practice travesties, still had lots of fish.
14. Satsop slide - has someone looked at it? Mass wasting - natural event.
15. Economic analysis.
16. Economic analysis needs to consider GMA, farming, forestry $ impacts.
17. Why does WSP appear to ignore the TFW "forestry module?"
18. Focus on healthy habitats. Focus on streams with the best chance to respond.
19. Extreme inequities between forest landowner/agriculture/developer.
20. When does WSP become effective?
21. Need more predator control; sea lions/seals/birds.
22. What does RMZ on T-5 do for fish/sediment retention?
23. Need to insure we aren't taking unfair advantage of the "little guy."
24. Need different standard for small vs. big.
25. Why do stream surveyors walk in spawning gravel? In redds?
26. Are the buffers negotiable?
27. WDFW needs to educate its staff to consideration of alternatives. More flexibility at field level.
28. 1990 model ordinance "wetlands" Legislature told DOE it was too extreme. Need to check whether it is (legal) or exceeds '87 manual. Use '87 manual.
29. Department needs to put on more training seminars.
30. Forest industry.

31. RMZ's too extreme.
32. Constitute takings.
33. Unfair to small landowners.
34. TFW works - utilize it .
35. Listen/consider landowner alternatives to buffers.

Aberdeen

1. **Response:** WDFW plans to significantly increase escapements.
2. **Response:** Comment noted.
3. **Response:** Comment noted.
4. **Response:** Comment noted.
5. **Response:** Comment noted.
6. **Response:** Yes.
7. **Response:** Comment noted. Although a seat on the Commission is not specifically designated for property owners, in fact most are, some current members are farmers, ranchers and/or forest land owners.
8. **Response:** Comment noted.
9. **Response:** We agree.
10. **Response:** Chapter III and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
11. **Response:** Alternative 3 provides recommendations.
12. **Response:** Comment noted.
13. **Response:** Comment noted.
14. **Response:** This has been referred to Region 6 for review.
15. **Response:** The level of detail is beyond the scope of a programmatic EIS.
16. **Response:** See response #15.
17. **Response:** See response #10.
18. **Response:** We agree.
19. **Response:** Comment noted. See revisions clarifying in Chapters III and V.
20. **Response:** WSP is scheduled for adoption in fall 1997. Specific implementation timelines have not been determined.
21. **Response:** Comment noted.
22. **Response:** See Chapter V.
23. **Response:** Comment noted.
24. **Response:** Comment noted.
25. **Response:** Surveyors are supposed to avoid redds.
26. **Response:** Yes, flexible.
27. **Response:** We agree.
28. **Response:** The performance measures would provide an adequate level of protection for wetlands.
29. **Response:** We agree.
30. **Response:** Comment noted.
31. **Response:** Comment noted.
32. **Response:** Comment noted.
33. **Response:** Comment noted.
34. **Response:** Comment noted.

35. **Response:** Comment noted.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Bellingham

1. Need for greater coordination/education with county, other government groups.
2. Existing federal restrictions preventing watershed restoration. Pressure needs to be exerted on Forest Service to speed up watershed analysis.
3. Department needs input to Forest Practices Board on stream typing, etc.
4. How does WDFW intend to work with landowners on stream typing?
5. WDFW least cooperative attitudes working with farms, others, regulatory system, "top down" - ignores people's concerns.
6. Alternatives #2 & #3 would remove intolerable % of land from productions.
7. Forest owners need to be part of process to find solutions.
8. WDFW needs to treat foresters as partners.
9. Examination of culverts, other blockages needed.
10. To improve habitat, make it economically viable for landowners - consider tax breaks.
11. Enforce existing laws designed to protect habitat - water rights - judges and courts too lenient.
12. Need watershed approach among differing landowners.
13. Do not take actions that may have negative impacts due to misinformation about various groups, communities, public interests.
14. Stop clearcut logging.
15. Need for comprehensive look at habitat issues with other government agencies, local government, private parties.
16. Incentives must be tied to land as opposed to individual.
17. Existing logging and other laws need to be enforced.
18. MIS typing of streams has caused numerous stream/fish blockage problems.
19. Hatcheries becoming more productive due to lack of habitat, waterway pollution.
20. WDFW needs to go further on Alternative #2 - focus needs to be on watershed management - full utilization of habitat needed.
21. Culverts big problem - in fish blockage.
22. Impacts of agricultural use of chemicals needs to be studied.
23. Endorses Alternative #2.
24. Any studies on whether existing habitat protection laws enforced?
25. Silt build-up and other problems need to be examined.
26. Down-stream problems need to be examined.
27. Those who impact habitat should pay to correct/mitigate problems.
28. Inconsistencies in wild salmon policy - agency should not tie hands to point can't negotiate TFW, elsewhere.
29. Setbacks should be enforced.
30. Tax on chemical producers, sellers that impact water quality.

31. Support Alternative #2. Siltation build-up real problem in lower watershed.
32. Are there any genetically-viable fish stocks?
33. Department needs to apply sound science. Actions need to be timely, based on economic and social impacts. Process needs to be streamlined for landowners.
34. Needs to be consolidated environmental analysis.
35. Need fair hearing process - an "exception to rule" process.
36. WDFW seems to be acting unilaterally - WDFW should drop the effort - rely on TFW.
37. Treat habitat issues as timber harvest problems - buffer zones large enough at present.
38. Timber industry has worked on habitat issues for years; urban/suburban zones should be included in buffer zones.
39. Culverts are a big problem - whose responsibility to fix culvert problems?
40. Predation of smolts by non-indigenous species a problem.
41. Delayed release program should be abolished.
42. Cattle access to waterways a major problem.
43. More resources needed for riparian zone work; need incentives for landowners to participate.
44. What are watershed councils?
45. What will be relationship between councils and fisheries enhancement groups?
46. Where will funding come from for monitoring and maintenance of enhancement and restoration projects?
47. Need scientifically sound performance standards.
48. Primacy must be given to habitat component of salmon plan.
49. More funding needed now for habitat projects.
50. Tax base needs to be reviewed.
51. Storm drains should be examined for impact on wild stocks.
52. Too much pressure in lowlands for tree farmers - class 3 buffer zones.
53. Harvest of trees on stream banks - methods need to be examined.
54. High % of stream no longer viable for spawning purposes or cannot support fish populations above certain levels.
55. Protecting wetlands critical; at present, federal state regulations not stringent enough.
56. Ban clear cutting near rivers.

Bellingham

1. **Response:** We agree. The policy indicates this will be done in two basic ways (1) by increasing our coordination and collaboration with other agencies on a frequent basis and (2) the Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
2. **Response:** Comment noted. The role of the federal government is minimal in this policy development but the policy will be used as guidance for WDFW when dealing with federal agencies. In addition, the policy calls for increased coordination with the federal agencies and encourages federal agencies to participate in watershed planning.
3. **Response:** We are very active in forest practices board studies and rulemaking processes including TFW. Chapter III and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
4. **Response:** See response #3.
5. **Response:** Comment noted.
6. **Response:** Comment noted.
7. **Response:** We agree, see response #3.
8. **Response:** We agree.
9. **Response:** We agree.
10. **Response:** We agree.
11. **Response:** We agree.
12. **Response:** We agree.
13. **Response:** Comment noted.
14. **Response:** See response #3.
15. **Response:** See response #1.
16. **Response:** Comment noted.
17. **Response:** We agree.
18. **Response:** We agree, see response #3.
19. **Response:** We disagree, water quality and quantity issues are more critical at fish hatcheries and rearing facilities because of the intensity of production. As well, when fish are released from the facility they have the same habitat requirements as wild fish. Fish facilities have and will continue to fail or become prohibitively expensive to operate if watershed are not protected.
20. **Response:** Comment noted.
21. **Response:** We agree.
22. **Response:** We agree.
23. **Response:** Comment noted.
24. **Response:** This type of evaluation has been infrequent and the level of detail has been inadequate.
25. **Response:** We agree.
26. **Response:** We agree. The policy stresses the “stream continuum” concept; upstream

processes and activities affect downstream conditions, including salmonid habitat and property. See Chapter III.

27. **Response:** Comment noted.
28. **Response:** See response #3.
29. **Response:** Comment noted.
30. **Response:** Comment noted.
31. **Response:** Comment noted.
32. **Response:** Yes.
33. **Response:** Comment noted.
34. **Response:** Comment noted.
35. **Response:** This type of accommodation exists in virtually every environmental rule.
36. **Response:** See response #3.
37. **Response:** The policy applies across all land uses.
38. **Response:** See response #37.
39. **Response:** The ultimate responsibility rests with the landowner. WDFW has implemented several statewide and county-specific fish passage surveys. Treaty tribes, regional enhancement groups and resource organizations have also assisted in surveys. Collectively many culvert problems have been identified and corrected statewide, working in cooperation with landowners, and state and federal transportation agencies and local governments.
40. **Response:** Comment noted.
41. **Response:** Comment noted.
42. **Response:** This problem varies with the intensity of operation and individual farm operations. It can be a substantial problem in some instances.
43. **Response:** We agree.
44. **Response:** Our concept would be a broad-based assemblage of interested landowners, citizens, industry and tribal, state, and local government agency representatives gathered in a consensus-based process to solve resource and other societal needs within watershed. The Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
45. **Response:** Fisheries enhancement groups are vital to preparation and implementation of watershed plans.
46. **Response:** We all need to consider all sources of funding, in-kind contributions, etc.
47. **Response:** We agree.
48. **Response:** Comment noted.
49. **Response:** We agree.
50. **Response:** We agree.
51. **Response:** We agree.
52. **Response:** Comment noted, see response #3.
53. **Response:** See response #3.
54. **Response:** Watershed planning would examine limiting factors for production and identify desired future conditions of habitat including cost, feasibility and societal needs.

55. **Response:** Comment noted.
56. **Response:** Comment noted.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Naselle

1. Commercial fisherman - 1988 biggest run ever - now nothing - why aren't there fish here - doesn't matter how good habitat is if ocean survival isn't' good. WSP is just another "talk" - and then nothing. Give credit to timber and agriculture for work they've done and still no fish.
2. Everyone knows forest practices are better than they were in 1978 and still no fish.
3. Each area needs to be addressed on their own basis rather than basis of all.
4. In last 12 years something has happened to fall and decline of fish. We're calling it habitat - need to look at ocean survival. Habitat is a cop out. Regs are ineffective in the long run.
5. Cormorants are up 500% - only one species that prey on salmon.
6. I hear about ocean survival but (statement #5 above) takes precedence! Hundreds of cormorants in my yard every night.
7. Cormorants eat 10 times their body weight.
8. Things are changing in Willapa - RSI's, timber, agriculture, volunteers - that's why we need area specific plans.
9. Best thing you could do for each watershed is to use the expertise in the room.
10. 1-2% return of hatchery fish shows there is something wrong in the ocean. Predators not a problem.
11. Forty fish hit my nets in 1 ½ days. Only three were sellable.
12. Don't feel WDFW is bargaining in good faith. Why does it seem timber industry is the only one being asked to leave buffers (i.e. developers, farmers, etc). Need equity. No blanket policy. Columbia River estuary needs to be addressed in habitat, dams as well.
13. Opposed to Type 4 and 5 RMGs - too extreme.
14. No credit in policy for forest practice changes. These need to be recognized by the Commission.
15. I give the Department credit - but I have a 700 acre tree farm that is my life. WSP is financial ruin for me.
16. Financial compensation for taking.
17. No fish planted in upper streams - so what's the issue?
18. Dairy farms are down by half in Willapa - financial burden - if you make buffers into fields farms will go over the edge.
19. Need to get WDFW out on the ground with timber industry.

20. Let us do what we've done before - flexibility - Type 4 and 5's. Take out alder-replant with conifer.
21. Need to be able to manage riparian management zones.
22. Alder issue - probably are a number of different ways to manage. Sounds like its in the policy - make it stronger. Evaluate as we go. Place in WSP what types of incentives are available (i.e. monetary, tax breaks, conservation programs, etc.).
23. Develop a process to identify incentive-based strategies.
24. Columbia River now in national estuary program - non-profit, privatized management.
25. State of Washington developing plans now - using welfare families to help with habitat - clean out streams, etc. Federal program to put people to work. WDFW should do this - make a plan and apply to feds.
26. I.D. watersheds as to holding capacity of individual species.
27. Do we have a way to i.d. ocean habitat and what fish use it?
28. Look at fish throughout range. Find fish to utilize full range habitat and come back.
29. On Nemah - Weyerhaueser is repairing all culverts, etc. Why are they doing this? Is it WSP?
30. WDFW needs to be honest with the public. We don't have habitat we had 20 years ago. What are the real consequences to the public?
31. Are you really willing to make this sacrifice? Not fulfilling Salmon 2000 (PSRE).
32. Interception by Canada needs to be addressed.
33. Private landowners-farmers should be compensated by Feds/State for buffers.
34. What are we going to do about predators?
35. WDFW/Contractors/to respect private property rights as addressed by Constitution.
36. Rice Island Terns - predation - grass would deter their nesting - Corps of Engineers.
37. I didn't buy my property years ago to donate to salmon habitat. I'm not opposed to doing my share - but not when people are opposed to timber/agriculture - wanting to stop all.
38. Habitat comes first - with 4,000 feet of fencing and riparian areas - still no fish.
39. Why can't you make partnerships with incentives rather than regulations? If you attempt to come in and roll over, it won't work.
40. Need to use local knowledge - plan needs to provide technical guidance to local groups and provide a feed-back loop.
41. Too much emphasis against tree-cutting.
42. Are class 4 and 5 streams inhabited by salmon? Do they run year around? Why are they considered fish habitat?
43. If you cut down size of buffer and limit logging season during dry periods - alternative.
44. I really believe some folks at WDFW think dams are coming out of the Columbia. No one explained if you want wild salmon - gates at boarder, clams, out - no farms, timber - if you want to stop genetic loss you will have to do all of the above. Work locally with common sense, use hatcheries to get fish back.
45. Public wants wild salmon. If Willapa hadn't been over harvested there would be fish. Let's be reasonable - McDonald's etc., will be here - so will wild fish.
46. WSP is so hard to read - sounds like a bunch of nerds wrote it - make it easier to read.

Naselle

1. **Response:** Comment noted.
2. **Response:** Comment noted.
3. **Response:** Alternative 3 keeps the specifics as guidance. If specifics don't apply and/or watershed planning can develop functional equivalents then local measures would apply.
4. **Response:** Comment noted.
5. **Response:** Predator control is addressed in revised Chapters II and IV.
6. **Response:** See response #5.
7. **Response:** See response #5.
8. **Response:** See response #3.
9. **Response:** Comment noted.
10. **Response:** Comment noted.
11. **Response:** Comment noted.
12. **Response:** Buffer apply regardless of land use. The problem is that buffer requirements are currently triggered by an application. So while new development must provide buffers, existing ones don't unless buffer retention was a requirement at the time of construction. In addition, the other habitat policy elements apply to all land uses as well.
13. **Response:** Comment noted. Chapter II and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
14. **Response:** See response #13.
15. **Response:** See response #13.
16. **Response:** If implementation resulted in taking, compensation could be awarded. WDFW will avoid taking through reasonable application of its authority.
17. **Response:** The policy will provide better escapement.
18. **Response:** Comment noted.
19. **Response:** Comment noted.
20. **Response:** See response #13.
21. **Response:** See response #13.
22. **Response:** Comment noted.
23. **Response:** Comment noted. This is an important implementation issue.
24. **Response:** Comment noted.
25. **Response:** WDFW is very involved in the Jobs for the Environment program that has similar objectives. Numerous projects have been funded and completed across the state.
26. **Response:** Comment noted.
27. **Response:** This issue is not well understood.
28. **Response:** Comment noted.
29. **Response:** This kind of activity is good stewardship that better protects habitat and protects the company's investment.
30. **Response:** Comment noted.
31. **Response:** WDFW is committed to the policy. Salmon 2000 was not a balanced package, could not be successful.
32. **Response:** We agree.

33. **Response:** Comment noted.
34. **Response:** See revised Chapters II and IV.
35. **Response:** Comment noted.
36. **Response:** This issue will be referred to Region 5.
37. **Response:** Comment noted.
38. **Response:** Comment noted.
39. **Response:** Comment noted.
40. **Response:** Comment noted.
41. **Response:** See response #12.
42. **Response:** Type 4 and 5 streams affect larger streams.
43. **Response:** Comment noted.
44. **Response:** Comment noted.
45. **Response:** Comment noted.
46. **Response:** Comment noted.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Port Angeles

1. Make sure allocated money is spent wisely.
2. Look at regional enhancement groups as model.
3. Perform follow-up evaluation.
4. Greater coordination, monitoring of programs.
5. Plan not designed to increase habitat.
6. Not sure statewide goal of habitat conservation/protection.
7. Buffer zones too many; impose restrictions on agriculture.
8. Plan does not compensate/take into account landowners.
9. Need to understand economic consequences of buffers based on best science/data available.
10. Forest practices board - WDFW should be on board.
11. Landfills/stormwater permits - Department needs to take more activist role.
12. Ground level solutions/goals provide greater flexibility.
13. Watershed analysis process carefully crafted in use.
14. Need for greater predator/study/control - small % engaging in behavior.
15. Fishing practices encouraging predator behavior.
16. TFW process incorporated into Alternative #3.
17. CWO
18. Use cooperative approach focusing on non-regulatory approach; cooperation; assistance; cooperation without regulations; incentives for landowners.
19. Watershed council concept needs to be developed.
20. Is agency moving away from TFW process?
21. Instream flow section of plan based on old science; need recognition of wide diversity of ecosystem flows.
22. Wetland mitigation banking should be restricted to watershed; if impact on salmonid habitat, mitigation for salmonids.
23. Establish mitigating funds for wild resources. Establish local mitigation funds.
24. Need incentives for voluntary enhancement/protection of habitat.
25. What authority does WDFW have?
26. What can be done to survey/repair culverts?
27. How much fish passage has been recovered; what do surveys say?
28. TFW, other processes should be developed; WDFW plan redundant.
29. Rules should be enforced on fish passage - how does policy affect this?
30. Need better coordination between counties/state to ensure culverts are proper.
31. Need more personnel in field to check permits, culverts, etc. Department needs to redirect personnel.
32. Department needs more authority on habitat.

33. Is department utilizing data/assistance provided by outside groups?
34. Policy should recognize volunteer assistance.
35. TFW should be recognized in policy.
36. Reliance on watershed councils - state dose not presently have support - need program to establish councils; conservation districts should be used.
37. Would like to see state develop aggressive program to establish watershed councils.
38. Clear cutting should be stopped except in certain cases.
39. Concerned about watershed councils/buffer zones - undue influence of county.
40. If WDFW wants across the board support, need more in-field point people; need better customer service.
41. Glad to see Department's admission - lack of authority on habitat.
42. County has difficulty in getting permits for fish passage.
43. Predator problems in South Puget Sound - need discussions with federal government over protected species/predator problems - especially non-indigenous species.
44. Riparian buffer should be devised by group similar to TFW.
45. Regional enhancement groups - how do they fit in?
46. Processes need to be streamlined utilizing local groups.
47. Are RSI's going to be utilized to enhance stocks?

Port Angeles

1. **Response:** We agree.
2. **Response:** Regional Enhancement groups are a key implementation mechanism.
3. **Response:** We agree.
4. **Response:** We agree. The policy indicates this will be done in two basic ways (1) by increasing our coordination and collaboration withe other agencies on a frequent basis and (2) the Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
5. **Response:** We disagree.
6. **Response:** Comment noted.
7. **Response:** Comment noted. Chapter II and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
8. **Response:** If implementation resulted in taking, compensation could be awarded. WDFW will avoid taking through reasonable application of its authority.
9. **Response:** The level of detail is beyond the scope of a programmatic EIS.
10. **Response:** We agree.
11. **Response:** Comment noted.
12. **Response:** We agree, Alternative 3 encourages this.
13. **Response:** We agree, WSP encourages its use.
14. **Response:** We agree, see Chapters II and IV.
15. **Response:** Comment noted.
16. **Response:** It has been, see response #7.
17. **Response:** Comment noted.
18. **Response:** Comment noted.
19. **Response:** The Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
20. **Response:** See response #7.
21. **Response:** Comment noted. See revised Chapter V. In essence, in terms of ecosystems, peak flows affect more than in stream habitat and salmonids. Managing landscapes with attention to attention of human-induced changes in peak flows could benefit other wildlife and society as well.
22. **Response:** We agree.
23. **Response:** Comment noted.
24. **Response:** We agree.
25. **Response:** WDFW does have authority but it is limited, we need the support of othe agencies.

26. **Response:** WDFW has implemented several statewide and county-specific fish passage surveys. Treaty tribes, regional enhancement groups and resource organizations have also assisted in surveys. Collectively many culvert problems have been identified and corrected statewide, working in cooperation with landowners, and state and federal transportation agencies and local governments.
27. **Response:** Complete detail of fish passage work is beyond the scope of the EIS.
28. **Response:** See response #7.
29. **Response:** See Chapter III Alternative 3.
30. **Response:** We agree.
31. **Response:** We agree, part of implementation is to develop staffing options.
32. **Response:** Comment noted. See response #25.
33. **Response:** Yes, for example see response #26. Tribes, regional enhancement groups etc. routinely share information with WDFW.
34. **Response:** It does.
35. **Response:** See response #7.
36. **Response:** See response #19.
37. **Response:** See response #7.
38. **Response:** We agree.
39. **Response:** See response #19.
40. **Response:** Comment noted.
41. **Response:** See response #25.
42. **Response:** Comment noted.
43. **Response:** See revised Chapters II and IV.
44. **Response:** See response #7.
45. **Response:** See response #2.
46. **Response:** We agree.
47. **Response:** See revised Chapters II and IV.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Seattle

1. Why is Department proposing an alternative that will restrict timber harvests, even though there are unused spawning grounds?
2. No economic analysis prepared.
3. How does Department intend to process timber applications?
4. Bad forest practices have contributed to the decline of fish populations.
5. Livestock, agricultural concerns are being forced to take backseat to concerns of fish.
6. Over harvesting a major reason for decline of fish.
7. Larger (150 ft.) buffer zones described in plan give incentive to timber owners to harvest.
8. How will you access habitat plan - (performance measures) in future?
9. What will be incentive for small landowners/timber harvesters to go along with plan?
10. Flow important in removal of culverts/stream blockages to WSP.
11. What are rules and guidelines on buffer zones and how are they enforced?
12. Will WDFW deny HPA's under WSP? Can WDFW legislate for habitat statute?
13. Is the department taking the approach of killing predators to rebuild/protect fish runs?
14. What control does department have over what forest service does to affect habitat?
15. Nature is only controlling factor for fish; what is department doing to ensure ???? do not impact fish runs?
16. Why aren't existing regulations being enforced?
17. What portion of WDFW budget is applied to habitat management and enforcement now?
18. Department should consider Alternative #2. Need to go for most restrictive.
19. Need for involvement by Governor Locke.
20. Are there proposals in WSP to have watershed planning at local level?
21. Are there plans to do statewide database to determine status of habitat at present?
22. How much control does department have over private lands?
23. Standards need to be scientifically sound.
24. Alternative #2 is biologically preferred.
25. Bureau of Reclamation should be challenged on Yakima River practices.
26. Watershed origin chinook and coho in selected lakes to increase populations of those fish.
27. Is there outreach program to reach out to city kids?
28. Department should provide leadership on watershed management.
29. Why is department spending inordinate amount on hatcheries as opposed to wild fish?
30. How does WSP address predator issues?
31. Would rather see reduced harvest levels to protect so-called predator species.
32. What is department doing to stop kelp poaching?
33. Loss of coastal estuarine - department needs to take serious look.
34. Department needs to examine predator issue and base decisions/management practices on sound science.

35. Increased buffer zones in WSP would impact tree harvests.
36. No provisions to compensate landowners impacted by buffer zones.
37. What action to address the small streams?
38. How does habitat element impact kelp beds?
39. Does plan address how state or WDFW can become stronger player in habitat regulator matters?
40. Failure to enforce existing habitat protection laws.
41. Buffers along riparian zones need to be modified on flood plains.
42. How does WSP address culvert issues?
43. WDFW needs to organize a larger group of employees to work specifically with local land use people.
44. How is department going to eventually determine the effectiveness of the WSP?

Seattle

1. **Response:** See Fish Management.
2. **Response:** An economic analysis is beyond the scope of the EIS.
3. **Response:** As it does now. We review and provide comments to DNR.
4. **Response:** Comment noted.
5. **Response:** Comment noted.
6. **Response:** Comment noted.
7. **Response:** Comment noted.
8. **Response:** A monitoring strategy will be developed as part of implementation planning. Monitoring plans should be included in watershed plans.
9. **Response:** A complete incentive strategy has not been developed, one should be included in watershed plans.
10. **Response:** The habitat components are interrelated and should be considered as a package. However, WDFW is currently engaged in a watershed restoration inventory project to identify, in the short-term, projects or actions that could remedy critical situations. In addition, as part of a watershed planning effort critical issues would be identified and agreement would be sought on desired future conditions.
11. **Response:** Contact the Department of Natural Resources.
12. **Response:** The rate of denials could increase, WDFW can submit agency request legislation but likely would not submit an independent request under Alternative 3.
13. **Response:** See fish management in revised Chapters II and IV.
14. **Response:** No direct control, but have agreements with regional and individual forests on operation that affect fish habitat.
15. **Response:**
16. **Response:** Most environmental regulations are enforced consistent with available funding, willingness to cooperate, improve practices and restore damages if needed.
17. **Response:**
18. **Response:** Comment noted.
19. **Response:** The Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
20. **Response:** Yes.
21. **Response:** Yes.
22. **Response:** WDFW does have authority but it is limited, we need the support of other agencies.
23. **Response:** We agree.
24. **Response:** Comment noted.
25. **Response:** Comment noted.
26. **Response:** Fish management
27. **Response:** Yes.
28. **Response:** We agree.

29. **Response:** Agency budgets will be analyzed and adjusted as necessary to implement the policy.
30. **Response:** See revised Chapters II and IV.
31. **Response:** Comment noted.
32. **Response:** This will be referred to the Department of Natural Resources.
33. **Response:** We agree, typically marine areas are omitted from watershed plans. The policy includes and integrates marine issues with watershed planning.
34. **Response:** We agree.
35. **Response:** We agree, but Alternative 3 is revised to allow more management flexibility and utilize TFW process as well to address forestry issues.
36. **Response:** Compensation should be considered in the TFW process.
37. **Response:** See revised Chapters III and V.
38. **Response:** Yes
39. **Response:** Yes
40. **Response:** See response #16.
41. **Response:** We agree.
42. **Response:** See revised Chapter III and revised Appendix C for fish access and passage.
43. **Response:** We agree. We have added biologists specifically for this purpose and also for implementation of the Puget Sound Action Plan which has a significant land use element.
44. **Response:** See response #8.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Spokane

1. Concerned about protecting riparian areas (timber harvest).
2. Concerned with effect actions upstream in watersheds have on those downstream.
3. How will agency influence other land use activities beyond TFW (i.e., agriculture)?
4. Positive effects of current forest practice rules? Unclear conclusion that additional protection is required.
5. Have you identified certain points in watersheds and specific actions, or are these general habitat recommendations?
6. Why the extreme cost for dam removal.
7. Would like examples of habitat lost each year (i.e., 30,000 acres per year).
8. This appears to be a subtle threat against property rights.
9. From 22% to 70-80% of private land could be taken out of production by protecting riparian habitats.
10. An additional 8% of a particular township would be taken under this policy.
11. Timber industry wants to continue to participate in TFW but are suspicious of some of the analyses in this policy and don't have the funding to conduct their own analyses.
12. Don't see how this policy de-values property.
13. Designate a seat for property owners on the Commission.
14. Commission should meet periodically with various property owner groups.
15. Is the Commission considering what the economic impacts of this policy are? Lost of jobs. Human beings are more important than fish.
16. Concerned about "salmon are our clients."
17. Because you have no authority on habitat, how do you hope to gain some authority?
18. As a state agency, what are your chances to enhance the habitat you have and restore what you've lost?
19. Screens for salmon recovery have not been installed. Who will enforce their installation?
20. How will the policy address the Snake River dams?
21. In Spokane County, farms have improved habitat over the past 30 or 50 years. Kentucky bluegrass farming is part of this. DOE's no-burn policy will result in turning these fields to annual tillage. This is directly in conflict with WDFW salmon recovery effort.
22. No incentives for timber industry to manage riparian zones or grow trees which are good for salmon.
23. What is WDFW's position on the Hanford Reach and is there an agency strategy for protecting it?
24. Until there are changes to the ESA, the concept of incentives is ineffective. No landowner wants an endangered species on their land.
25. Talk to Grant County PUD about Hanford Reach.
26. Peak flows - is this being through of in terms of ecosystems, or generalities?

27. Ecology just finished non-point source study. Will WDFW work with Ecology to assure no duplication of effort?
28. Is there an effort to identify the most critical problem and address that issue first?
29. Impact of introduced pelicans on salmon?
30. Timber industry is already involved in a process (TFW). No willing to negotiate in a public forum.
31. Size of watershed? Size of councils? How appointed?
32. How "rounded" are these watershed councils?
33. Giving more incentives to agriculture and timber would result in more cooperation beyond regulations.
34. This seems like a last ditch effort. Is this just a response to a feat that the federal government will jump in?
35. Legislature should let agencies do their jobs.
36. In eastern Washington we have a model habitat at the Hanford Reach. WDFW should step in and protect this unique site.
37. Work with DNR and other state agencies to protect watersheds.
38. Farm Bureau concerned that WDFW considers salmon to be client.
39. Sierra Club concerned that WDFW will not give watershed councils clear indication of what wild salmonids need. WDFW has been largely invisible in ESA process on the Snake River. Hope that role will increase on the Columbia.
40. What sort of cooperative efforts are there between Washington, Idaho, and Oregon.
41. Does this policy include DNR, Ecology, and other agencies?
42. Is this subject to approval by the Northwest Power Planning Council?
43. Perception that policy doesn't attempt to influence/affect urban development; only focuses on agriculture and timber.

Spokane

1. **Response:** Comment noted.
2. **Response:** We agree. The policy stresses the "stream continuum" concept; upstream processes and activities affect downstream conditions, including salmonid habitat and property. See Chapter III.
3. **Response:** The policy indicates this will be done in two basic ways (1) by increasing our coordination and collaboration with other agencies on a frequent basis and (2) the Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
4. **Response:** Chapter III and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
5. **Response:** These are general recommendations to be used as guidance for habitat protection across the variety of land uses and ecoregions of the state. Watershed level planning would provide specific implementation details. In addition some state or local regulations could change in order to implement the policy.
6. **Response:** In general, costs are high because of demolition and disposal, remoteness of sites and avoidance of short-and long-term environmental impacts of removal.
7. **Response:** See Chapter V.
8. **Response:** It is not intended to violate property rights.
9. **Response:** Comment noted.
10. **Response:** Comment noted.
11. **Response:** See response #4.
12. **Response:** Comment noted.
13. **Response:** Although a seat on the Commission is not specifically designated for property owners, in fact most are landowners, some current members are farmers, ranchers and/or forest land owners.
14. **Response:** Comment noted. Commissioners have been involved in numerous meetings with industry groups and often participate in farmland/forest tours.
15. **Response:** See Chapter I.
16. **Response:** Comment noted.
17. **Response:** WDFW does have authority but it is limited, we need the support of othe agencies.
18. **Response:** This is difficult to assess. It depends on how much we all value this resource. This is not a WDFW problem per se. Everyone must contribute.
19. **Response:** WDFW has authority as well as the federal government. It should be a collaborative effort, especially at federal facilities.
20. **Response:** The policy does not identify specific rivers, but the goals, performance measures, and action strategies would apply anywhere dams exist.
21. **Response:** Comment noted, also see response #3.
22. **Response:** Comment noted, see also response #4.

23. **Response:** WDFW would like to see it remain in federal ownership and are working on options to ensure this happens.
24. **Response:** Comment noted.
25. **Response:** Comment noted.
26. **Response:** In essence, in terms of ecosystems, peak flows affect more than in-stream habitat and salmonids. Managing landscapes with attention to human-induced changes in peak flows could benefit other wildlife and society as well.
27. **Response:** Yes.
28. **Response:** The habitat components are interrelated and should be considered as a package. However, WDFW is currently engaged in a watershed restoration inventory project to identify, in the short-term, projects or actions that could remedy critical situations. In addition, as part of a watershed planning effort critical issues would be identified and agreement would be sought on desired future conditions.
29. **Response:** This is not well understood.
30. **Response:** See response #4.
31. **Response:** The policy defers these details to JNRC. See response #3.
32. **Response:** See response #3.
33. **Response:** We agree, see Chapters II and V.
34. **Response:** In the short-term the WSP probably will not forestall listings, however it can serve as an underpinning for preparation of recovery plans. See also response #3.
35. **Response:** Comment noted. However, support and guidance from legislature is critical to the success of the policy.
36. **Response:** See response #23.
37. **Response:** We agree, see responses #3 and 17.
38. **Response:** See response #16.
39. **Response:** Comments noted.
40. **Response:** WDFW is involved in numerous interstate efforts. Examples include the Northwest Power Planning Council and the Pacific Fishery Management Council. WDFW is currently preparing a bi-state ESU recovery plan with Oregon for steelhead being considered for ESA listing.
41. **Response:** Not directly as a joint policy, but see response #3.
42. **Response:** No, but their support would be vital.
43. **Response:** The policy is "blind" to land use pre se. It addresses the processes functions and habitat quality necessary to protect and recover salmonids regardless of land use. There are numerous references to urban and rural residential issues which would be addressed through the application of growth management principles affecting salmonid habitat. Hydropower and transportation issues are addressed as well.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Tacoma

1. Inadequate water surface management - stormwater problems, etc.
2. WCC-other volunteers should be used more for habitat enhancement work.
3. Public education a big challenge - more department emphasis on public education.
4. Riparian zones in plan differ from past department practices.
5. Landowners should have opportunity to implement past agreements.
6. Man-made structures (dams, etc.) Impeding fish passage and need to be removed/revised.
7. WDFW plans should not interrupt TFW processes.
8. Plan should remain flexible based on geography.
9. Too little funding to assist landowners for culvert repairs, etc.
10. Property developers vested under old laws.
11. Need more watershed education.
12. Heavy-handed regulatory approach won't work - need cooperatively-based approach with landowners.
13. Is habitat going to be created, enhanced?
14. Why didn't department develop/propose habitat implementation measures/standards?
15. Will 601 spending cut impact WSP?
16. Timber companies need more time to correct problem culverts (re: 30 year DOT).
17. Alternative #2 should be supported; more restrictive based on sound science.
18. Determine which streams are fish producing.
19. WDFW, on its lands, needs to provide model for other landowners.
20. Inventory problems; infractions by timber companies.
21. WDFW needs member on Forest Practices Board.
22. Elwha dams should be removed at lowest cost. Sediment does not need to be removed completely - let nature work.
23. Need better enforcement of existing regulations on habitat protection.
24. WDFW needs to interact with other agencies better.
25. Existing regulations inadequate.
26. Work can be done on water surface management in urban/suburban areas.
27. Timber industry should not be singled out; industry is already adhering to many regulations.
28. TFW good process.
29. Chehalis Basin Task Force good example of local leadership - non-regulatory approach - people willingly participating.
30. Stream nutrient loads need to be examined.
31. What can be done to make non-fish bearing streams productive again?
32. Where does responsibility lie? Consequences inadequate for violators.
33. Measurement standards for streams do not indicate lack of benefits for fish.

34. Regulations already in place for forest violations.
35. When is habitat destruction going to stop?
36. Polls indicate people want to protect/save fish.
37. State does not adhere to own laws when it comes to fish passage.
38. Agricultural practices need to be examined.
39. Is department wasting its time on small streams/regulation enforcement?
40. DOT should be used to repair culverts.
41. How much impact do stream teams have?
42. State refuses to enforce/monitor water quality on Lower Grays Harbor. Police pulp mills. Water quality/fish populations being negatively impacted by pulp industry.
43. All mills should adhere to same regulations/standards/
44. Is department monitoring storm drain systems - upstream?
45. Need greater coordination among state agencies.
46. No commercial fisher on TFW - why?
47. Too much regulatory threat to farms.
48. Permitting process needs to be easier for farmers - (getting water to cattle, etc.).
49. Hobby farms pose major problems vs. mainstream agriculture.
50. Department should not ignore urban or other problem watersheds.
51. What is situation with Snoqualmie Valley water quality, fish populations?
52. Are lagoons being monitored?
53. Agricultural practices impacting commercial fishers.
54. Coastal communities being impacted by practices in inland communities.
55. Everything being done is impacting fishers.
56. Why is farmer getting blamed when farms are disappearing?
57. Mainstream farmers being unfairly blamed.
58. Septic tank failures impacting habitat.
59. State may face "taking" situation - funding sources need to be examined.
60. Regulations not flexible enough.

Tacoma

1. **Response:** We agree.
2. **Response:** We agree.
3. **Response:** We agree.
4. **Response:** Comment noted.
5. **Response:** Comment noted.
6. **Response:** Comment noted.
7. **Response:** Chapter III and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
8. **Response:** Watershed planning would examine limiting factors for production and identify desired future conditions of habitat including cost, feasibility and societal needs.
9. **Response:** We agree.
10. **Response:** Comment noted.
11. **Response:** We agree.
12. **Response:** Comment noted.
13. **Response:** Yes to both.
14. **Response:** Specific implementation measures would be developed as part of a watershed plan. The policy provides guidance for developing these plans.
15. **Response:** It probably would.
16. **Response:** Comment noted.
17. **Response:** Comment noted.
18. **Response:** We agree.
19. **Response:** As part of policy implementation each wildlife area plan will be reviewed for consistency with the policy and plans amended as necessary to provide better protection for wild salmonids.
20. **Response:** Comment noted.
21. **Response:** We agree.
22. **Response:** Comment noted.
23. **Response:** Comment noted.
24. **Response:** The policy indicates this will be done in two basic ways (1) by increasing our coordination and collaboration with other agencies on a frequent basis and (2) the Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
25. **Response:** Comment noted.
26. **Response:** We agree.
27. **Response:** See response #7.
28. **Response:** See Response #7.
29. **Response:** Comment noted.
30. **Response:** We agree.
31. **Response:** See Chapter III and Alternative 3.

32. **Response:** It is beyond the scope of this EIS to identify responsibility for many past actions, but your comment is noted.
33. **Response:** Comment noted.
34. **Response:** Comment noted.
35. **Response:** Hopefully the policy and other efforts will be effective in encouraging society as a whole to examine its effects on habitat and to make the value judgements and sacrifices necessary to protect and restore habitat.
36. **Response:** We agree.
37. **Response:** Comment noted. WDFW has implemented several statewide and county-specific fish passage surveys. Treaty tribes, regional enhancement groups and resource organizations have also assisted in surveys. Collectively many culvert problems have been identified and corrected statewide, working in cooperation with landowners, and state and federal transportation agencies and local governments.
38. **Response:** We agree.
39. **Response:** No.
40. **Response:** We agree, see also response #37.
41. **Response:** This has not been thoroughly evaluated, but suffice to say WDFW feels they have had a positive impact, especially in fostering education and a conservation ethic.
42. **Response:** Comment noted.
43. **Response:** Comment noted.
44. **Response:** Not in any organized fashion. Some local governments do, as well as the Department of Ecology.
45. **Response:** We agree. See response #24.
46. **Response:** We are not sure, TFW is open to everyone.
47. **Response:** Comment noted.
48. **Response:** Comment noted.
49. **Response:** The level of impact varies with the landowners. However generally speaking the policy supports retention of mainstream agriculture as opposed to fragmentation of large parcels because of the cumulative negative impacts of fragmentation (including increased roading, water use, channel encroachment, and flood maintenance activities)
50. **Response:** We agree. The policy applies to all land uses and activities not just forest lands.
51. **Response:** This level of detail is beyond the scope of the EIS.
52. **Response:** Yes.
53. **Response:** Comment noted.
54. **Response:** We agree.
55. **Response:** We agree.
56. **Response:** See response #49.
57. **Response:** See response #49.
58. **Response:** We agree.
59. **Response:** Comment noted.
60. **Response:** Comment noted.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Tumwater

1. Proper logging makes big buffers unnecessary.
2. Follow TFW to get consensus solution.
3. Policy lacks incentive for landowners to cooperate voluntarily.
4. Buffers will take too much timber and force quick timber sales.
5. Coastal streams with large buffers are filled with fish.
6. Escapement and harvest are critical to protect fish - 25 years ahead in habitat.
7. Lots of habitat not being used.
8. Wind throw causes major problems in Type 3 and 4 streams.
9. Need more options on protecting streams. Some may need timber removal, especially Type 3, 4 or 5 streams.
10. Regarding land use councils: Source of funds? Expecting citizens to solve complex problems? Ask citizens to make sacrifices without certain results.
11. Question citations (Matthews).
12. Unclear language in defining prescription.
13. Watershed council's aren't enough hammer.
14. Not convincing that salmon are client without a strong hammer.
15. Willapa Bay Water Quality council sufficient?
16. Fisheries needs public concern orientation.
17. Fencing cattle out of streams in Willapa has resulted in fewer fish.
18. Clarify incentives for landowners.
19. Will WDFW look at impact of fish from net pens (disease, lice, etc.)?
20. Central Puget Sound needs steps to rebuild herring schools.
21. Restore kelp, eel grass, other aspects of marine habitat.
22. "Protect" salmon habitat sends wrong signal - use "enhance."
23. Incentives to avoid conversions.
24. Emphasize personal approach, get to know landowners and <u>fund them</u> for habitat restoration. Incentives are very important.
25. What role is work by USFS, TFW on land use receiving?
26. Buffers in proposals wold triple and require them on non-fish bearing streams.
27. Need cost/benefit analysis for setting buffers.
28. Concerned about rules developed while cost/benefit analysis is done.
29. Small landowners have challenged TFW regulations.
30. Final decision being made for Hanford Reach - what is WDFW's position?
31. Only 50% of habitat currently being used by fish.
32. Need quick approval for habitat improvement projects.
33. Stress need for coordinated monitoring of salmon recovery to insure expense is rebuilding stocks.

34. Need to ascertain carrying capacity of habitat available.
35. WDFW planning to limit habitat damage by fishing gear?
36. Control of sea lions and seals and other predators.
37. Given need to co-manage with tribes. How relate fish management with tribes as well as local councils?
38. If councils don't require buffers what would WDFW do?
39. Reconcile tree farms and fish habitat needs in an economic manner.
40. What happens when too many fish spawn?
41. How fast are ESA listings coming? How many years do we have?
42. I own a class 3 stream, survey showed culverts block stream. How control lands outside forest lands to deal with culverts, etc.
43. Where will funds come from to permit fish passage where county has blocked passage?
44. How do we control land use along streams?
45. Cattle herds have not reduced fish runs.
45. Oppose expansion of forest buffer zones.
46. Farmers can plant crops up to stream; developers can put trailer courts next to stream - why penalize tree farms?
47. Offer incentives to landowners who want to improve property.
48. Hire people with good common sense rather than people who want to write laws.
49. Cattle pre-date salmon in the Deschutes.
50. Weather pattern has reduced salmon in this region.
51. Question if farmer's livestock pollute streams. Fish runs have been strong where cattle have existed for decades - check human waste problems - septic tanks, etc.
52. Fence requirements will force cattle farms out of business and land will convert to residential where more chemicals are used.
53. Allow farms to water livestock with wells if they can't take cattle to streams.
54. Chehalis Council has sent example with cooperation, incentives and assistance.
55. Don't force people into a box.
56. Need WDFW response to local efforts to improve fish passage.
57. Nets play bigger role in fish loss than human or animal waste.
58. Stop killing fish to get fish back.
59. Wide buffers will destroy small tree farms and force sales to developers.
60. Encourage tree farms to remain in business.
61. Crop farmers lack controls imposed on tree farmers.
62. Incentive programs are effective to encourage farming. Farm service agency has a conservation reserve program.
63. Evaluate work done to reestablish habitat restoration efforts - set up a mechanism to do it.
64. Nets are killing fish, not habitat.
65. Evaluate if habitat has been improved with empirical evidence.
66. Why is Tacoma opened to fishing when North Sound is closed?
67. How much salmon habitat is being used?
68. Farmers fear hearing their streams carry fish. Make incentives so landowners want fish on their property.
69. WDFW isn't out surveying streams to get better data.

Tumwater

1. **Response:** Comment noted.
2. **Response:** Chapter III and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
3. **Response:** Comment noted.
4. **Response:** Comment noted.
5. **Response:** Comment noted.
6. **Response:** Comment noted.
7. **Response:** Comment noted.
8. **Response:** We disagree, while windthrow can and has caused significant damage in some instances we think the impacts are exaggerated. The problem in most streams is lack of numbers and sizes of functional large woody debris. In some cases where windthrow problems can be accurately assessed, removal makes sense and placement of LWD should be considered.
9. **Response:** See response #2.
10. **Response:** The Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
11. **Response:** Comment noted.
12. **Response:** Comment noted
13. **Response:** Comment noted.
14. **Response:** Comment noted.
15. **Response:** An assessment of this nature is beyond the scope of the EIS.
16. **Response:** We agree.
17. **Response:** Comment noted.
18. **Response:** This would be done as part of implementation.
19. **Response:** Yes.
20. **Response:** We agree.
21. **Response:** We agree.
22. **Response:** Both strategies are essential.
23. **Response:** We agree.
24. **Response:** Comment noted.
25. **Response:** See response #2. The role of the federal government is minimal in this policy development but the policy will be used as guidance for WDFW when dealing with federal agencies. In addition, the policy calls for increased coordination with the federal agencies and encourages federal agencies to participate in watershed planning.
26. **Response:** Comment noted.
27. **Response:** Economic analysis is not required for a programmatic EIS on policy direction.
28. **Response:** Comment noted.
29. **Response:** Comment noted.

30. **Response:** WDFW would like to see it remain in federal ownership and we are working on options to ensure that happens.
31. **Response:** Comment noted.
32. **Response:** We agree.
33. **Response:** We agree.
34. **Response:** We agree.
35. **Response:** Yes.
36. **Response:** This is addressed in the policy.
37. **Response:** See response #10.
38. **Response:** We are confident adequate buffers will result from watershed planning. If watershed planning fails, the department would need to seek other remedies.
39. **Response:** We agree.
40. **Response:** See revised Chapters II and IV.
41. **Response:** Yes, from the present out 1-2 years, it depends on the federal government.
42. **Response:** The policy addresses fish passage regardless of land use/ownership.
43. **Response:** From a variety of public sources at the state, local and federal levels.
44. **Response:** Fundamentally through EMA.
45. **Response:** Comment noted.
46. **Response:** The policy addresses all land uses.
47. **Response:** Comment noted.
48. **Response:** Comment noted.
49. **Response:** Comment noted.
50. **Response:** Comment noted.
51. **Response:** Comment noted.
52. **Response:** Comment noted.
53. **Response:** We agree in concept.
54. **Response:** Comment noted.
55. **Response:** Comment noted.
56. **Response:** We support.
57. **Response:** Comment noted.
58. **Response:** Comment noted.
59. **Response:** Comment noted.
60. **Response:** Comment noted.
61. **Response:** See response #46.
62. **Response:** Comment noted.
63. **Response:** Comment noted.
64. **Response:** Comment noted.
65. **Response:** Comment noted.
66. **Response:** This level of detail is beyond the scope of the EIS.
67. **Response:** See response #66.
68. **Response:** Comment noted.
69. **Response:** We disagree, however survey efforts will need to be increased significantly, we can and have used volunteers, tribal, and industry biologists as well.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Vancouver

1. What kind of data exists to show change in Habitat since 1978. Where is data to show additional buffers are needed?
2. University of Washington scientists suggest using 20 year old science.
3. Adopting buffers means significant economic loss to small woodlot owners, planning to do so?
4. Who pays for the tree-leaves? Cut out all fishing until farmer is compensated.
5. Can state contribute (match) dollars up-front?
6. Have we looked at how buffers eliminate access to blocks of timber?
7. Is there a baseline established for monitoring (habitat, lands, etc.)?
8. Do a better job than spotted owl. Lost lots of money.
9. How are local communities going to be involved in watershed council structure?
10. Avoid environmental pressure, don't prove that lies work.
11. Is success likely with only partial protection of habitat (Alternative # 3 vs. Alternative #2)?
12. Better enforcement in Alternative #3? Cedar cut in buffer (violation) - people should be liable for violations.
13. Science not behind additional buffers.
14. Yacolt Burn good illustration that temperature problems may not be a problem - review science critically. Controlled experiment - justify buffers, etc.
15. Give more time to review WSP document.
16. Talk to people on the ground about <u>their</u> streams. Communication is two-way.
17. Stronger buffers not based on science.
18. Water was warm long ago (Toutle).
19. How well have you worked with county officials controlling development? At all? In Cowlitz County?
20. Have buffers helped? Data? Monitoring? Lots of fishermen. Cause/Effect.
21. Road building a huge problem but directly conflicts with increased buffers! Water crossings.
22. All stream reaches are unique. Manage site specific - conflicts with prescriptive.
23. Fish are public resource. Landowners don't have right to degrade public resource. Support watershed analysis and have landowner tell us what might work.

24. Where are the biggest bangs for the buck? How do we get more benefit? Don't be counterproductive. Approach landowners to work with them - but if they're not the problem, be productive.
25. Too often penalties, not enough incentives. Stewardship plan involvements - tailor made.
26. 150 foot buffer on Types 1-3 streams will kill this plan if enforcement is involved - change language - no cookie cutter. Articulate! Alternative #2 vs. #3. Standards vs. measure - what's the definition?
27. Not enough emphasis on Type 5 streams. Source of water quality - vital.
28. Cost/benefit analysis needed - buffers. Benefit to public - huge cost to landowners. No analyses of success from last buffer increase.
29. Disconnect between TFW and WSP. 60% of trees 25 years or older has no basis in hydrology. WDFW sat at the table through all modules in TFW. Are we stepping out of TFW process?
30. Is WSP likely to bring water rights restrictions?
31. Local cooperation is good. But, prescription philosophy is not a voluntary, cooperative process - "strawdog." Encouraged about TFW becoming more integral.
32. Set buffers based on what is affordable.
33. Prescription on paper will prematurely cut riparian areas. The changes in Type 4's to 3's will create a new Type 6! Where does a 5 cease?
34. Small landowners know their land - can help tailor harvest plans to benefit fish (e.g., leave areas on steep slopes, sun facing) prescriptions = failure.
35. Arleamsas Creek - cows in creek are unregulated, timber land is regulated. Culverts - when is public going to get involved?
36. What about introducing fish above areas where they haven't been before?
37. Habitat biologists write too many permits instead of determining habitat needs. Oregon is cooperative, good relationships. Washington has too many rules - neither side is productive.
38. Small woodlot owner is best friend habitat has. Develop alternative.
39. Is there a policy to help landowners to establish restoration projects?

Vancouver

1. **Response:** See Chapter V.
2. **Response:** Comment noted.
3. **Response:** Comment noted.
4. **Response:** If implementation resulted in taking, compensation could be awarded. WDFW will avoid taking through reasonable application of its authority.
5. **Response:** Needs further explanation.
6. **Response:** Yes.
7. **Response:** This would be part of individual watershed planning.
8. **Response:** Comment noted.
9. **Response:** The Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
10. **Response:** Comment noted.
11. **Response:** This depends on the ability of watershed councils and other processes to address the issues cooperatively rather than being forced to by regulations.
12. **Response:** Comment noted.
13. **Response:** Comment noted.
14. **Response:** Buffers provide more than temperature control, see Chapter V.
15. **Response:** Comment noted.
16. **Response:** We agree.
17. **Response:** Comment noted.
18. **Response:** Comment noted.
19. **Response:** WDFW has been heavily involved in growth issues in Cowlitz County without adequate response.
20. **Response:** Yes.
21. **Response:** We agree.
22. **Response:** Comment noted.
23. **Response:** Comment noted.
24. **Response:** Comment noted.
25. **Response:** Incentives need to be a significant part of policy implementation.
26. **Response:** Comment noted. Standard would be a legal requirement. Measure is a recommendation that could be voluntary or regulatory.
27. **Response:** Type 5 streams are included in the policy of the FEIS.
28. **Response:** Economic analysis is beyond the scope of the EIS.
29. **Response:** Comment noted. Chapter II and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
30. **Response:** It could result in restrictions on new water rights.
31. **Response:** See response #29.
32. **Response:** Comment noted.

33. **Response:** Comment noted, also see forest practices rules, contact the Department of Natural Resources.
34. **Response:** Comment noted.
35. **Response:** The policy applies to all land use.
36. **Response:** See revised Chapters II and IV.
37. **Response:** Comment noted.
38. **Response:** Comment noted.
39. **Response:** There is no specific policy but WDFW is actively involved with landowners who wish to restore habitat. Contact Region 5 in Vancouver.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Walla Walla

1. What is WDFW's view on controlling floods?
2. Variability of rainfall.
3. Fish populations affected by more than floods.
4. Locally-based watershed councils have problems; locals need more influence. Bioengineering unproven.
5. Many watershed plans; need one locally-based.
6. Where does Timber-Fish-Wildlife fit in?
7. There are successful watershed projects.
8. Tailor regs to local area; don't need 200-foot riparian zones (TFW); be site specific.
9. HPA not adequate for the project, too restrictive.
10. Can't communicate with WDFW.
11. IFIM flows too high; science not good; need maintenance flows, not optimum flows.
12. Relationship with cost/share programs - many state, federal programs available.
13. High cost of damage clean-up on Walla Walla River.
14. Coordination with Power Planning Council needed.
15. Need WDFW commitment to address habitat issues on their land.
16. In developing policies/plans, look at successes by other groups (i.e. soil erosion).
17. Need more escapement; too many fish being caught.
18. Mitigation for HPAs is unfair, unreasonable; common sense should factor in.
19. Need to look at upper watershed to stop flooding in lowlands.
20. How will WDFW treat water rights?
21. First in time, first in line. Will property owners be asked to give up water?
22. Water wasted in spring. Need storage (via dam).
23. How will WDFW deal with Oregon's increase in water right?
24. Walla Walla River/Mill Creek flows start in Oregon. Must deal with interstate issues.
25. Will WDFW cost-share for habitat on private land?
26. Federal dollars not always available.
27. HB1309 applied to other ownerships.
28. How will WDFW address fencing streams? Need to involve grazers. Need to address in the policy.
29. Water rights and grazing must be addressed.
30. Four years ago developing this plan was done without contacting farm bureau, tribes, and other groups.
31. Should allow voting on ideas generated in these meetings.
32. Eight percent is westside salmon recovery.
33. What science for 50-foot buffer on Alternative #5. Should be site specific.
34. Need inventory on what groups are already working on habitat; need baseline data.

35. Watershed analysis should be used. Landscape planning, stream-typing data should be used.
36. Declines in salmon possibly a natural decline. Too short a time to implement this policy. Forty years of salmon declines.
37. Economic impact?
38. Who pays?
39. "Fish are client" puts fish over humans. Delete!
40. Need more balance. Water values also important.
41. Where does money come from?
42. Penalized if salmon on your property.
43. Trees in the river are bad for fish.
44. Flood damage caused by lack of maintenance.
45. "Cooperation" needed by WDFW.
46. HB1443 good bill but opposed by WDFW.
47. Natural marine erosion promoted in plan. How does this apply to rivers?
48. Trees fall into river and cause erosion. Expensive.
49. WSP not helpful to TFW; counterproductive; need cooperation of landowners. Do not alienate! What's the rush with adopting this policy before TFW finishes its process on the riparian rule?
50. Concerned about land purchase. No net loss of agricultural lands. Lands purchased should be balanced with giving some back.
51. Why use model wetlands ordinance when it was not adopted? (C-25 P2A)
52. Agricultural lobby too powerful.
53. Environmental lobby too powerful.
54. "C-16" irrigation return flows must meet tribal water quality standards (Farm bureau)
55. Two percent of population in agriculture is not representative of Ag's importance.
56. Will the department get involved in cost share programs with landowners? Step up to the plate!

Walla Walla

1. **Response:** Salmonids have evolved with the positive and negative effects of flooding. As such, WDFW does not support the concept of flood control. Rather, we support the concept of flood damage reduction. That is managing human activities, including land use zoning, in manner that does not significantly alter natural hydrology and in a way that accommodates floodway extent and function.
2. **Response:** We acknowledge the variability of rain fall as a major determinant in creating and maintaining salmonid habitat.
3. **Response:** We agree. See Chapter V.
4. **Response:**
5. **Response:** See response #4.
6. **Response:** Chapter II and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
7. **Response:** Agree, we would expect to integrate the WSP into them, see response #4.
8. **Response:** See response #6.
9. **Response:** Comment noted.
10. **Response:** Comment noted.
11. **Response:** Comment noted.
12. **Response:** We agree, they are an important component of Alternative 3.
13. **Response:** See response #1. Properly-integrated flood damage reduction can benefit property and fish and wildlife resources.
14. **Response:** We agree, WDFW has briefed NWPPC on the Policy. We will continue to collaborate with them.
15. **Response:** As part of policy implementation each wildlife area plan will be reviewed for consistency with the policy and plans amended as necessary to provide better protection for wild salmonids.
16. **Response:** We agree.
17. **Response:** Addressed in fish management.
18. **Response:** Comment noted.
19. **Response:** Agree, see response #1. Also, The policy stresses the "stream continuum" concept; upstream processes and activities affect downstream conditions, including salmonid habitat and property. See Chapter III.
20. **Response:** With respect for their legal standing.
21. **Response:** Water conservation, reuse, storage and trust water rights are actions which we recommend in order to provide better instream flows. The details could be left to local watershed planning or other forums.
22. **Response:** Comment noted. Stored water as a means to provide for human needs consistent with protection or recovery of wild salmonids should be considered in watershed planning.

23. **Response:** Regional staff will address this issue as part of normal environmental review activities.
24. **Response:** Comment noted. See response #23.
25. **Response:** Yes, we frequently do.
26. **Response:** Comment noted. We all need to consider all sources of funding, in-kind contributions, etc.
27. **Response:** HB1309 Ecosystem standards are a reasonable approach to mitigation of agricultural grazing but would not be required under Alternative 3.
28. **Response:** Fencing is just one strategy to address grazing impacts. Grazing plans need site-specific application. The policy would not automatically rule fencing in, or out.
29. **Response:** We agree.
30. **Response:** Comment noted.
31. **Response:** Comment noted.
32. **Response:** Comment noted.
33. **Response:** See response #6.
34. **Response:** We agree, this would be part of implementation.
35. **Response:** We agree, the policy encourages these actions.
36. **Response:** Watershed functions still need to be maintained.
37. **Response:** An economic impact study is beyond the scope of an EIS on policy, but could be necessary for changes in regulations.
38. **Response:** The question of who pays should be part of implementation.
39. **Response:** Comment noted.
40. **Response:** Implementation including watershed planning would consider all values and needs and seek to achieve an equitable balance between resource and societal needs.
41. **Response:** See response #26.
42. **Response:** Comment noted.
43. **Response:** We disagree, while trees may cause bank erosion and channel shifting that affects riparian owners, on balance streams with trees and tree parts are more productive for salmonids.
44. **Response:** We disagree. Maintenance is the name of flood control can exaggerate flood problems in the immediate vicinity or transfer the effects to downstream areas. Conversely functional flood plains can reduce downstream impacts.
45. **Response:** We agree.
46. **Response:** Comment noted.
47. **Response:** It would apply the same. Although erosion can cause property and habitat damage, erosion within natural rates provides gravel to spawning beds and large woody debris to channels as well providing sediments and organic material to estuaries.
48. **Response:** See responses #43 and #47.
49. **Response:** See response to #6. In addition the policy applies across all land uses, not just forest land.
50. **Response:** Comment noted.

51. **Response:** The performance measures would provide an adequate level of protection for wetlands.
52. **Response:** Comment noted.
53. **Response:** Comment noted.
54. **Response:** The tribal reference was omitted.
55. **Response:** Comment noted, see revised Chapters III and V.
56. **Response:** Yes, we frequently do.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Wenatchee

1. WDFW doesn't manage land well.
2. Sounds like you want more land. Where's the compensation?
3. Concerned that salmon are your client. Don't lose sight of public out here, plus needs for transportation, electric power, etc. Hope WDFW hasn't gone too far to correct mistakes of the past.
4. Concerned about riparian buffer impacts on landowners.
5. If a plan affects people's lifestyles, it can be challenged under federal law. Buffer zones are a problem for small landowners, who often have the most valuable land. Compensate!
6. Will Growth Management Act be used to put this policy in place? How will you accommodate the transfer of wealth, letting some do things and others not. Impacts are specific to local individuals. Dilemma is concurrent working of GMA and WSP.
7. This policy misrepresents the NMFS listing process.
8. ESA is a bad law. Change this source of the problem. Disagree with "wild" designation. There is not a problem here.
9. President Clinton says ESA doesn't affect landowners with five acres or less. Large landowners can do Habitat Conservation Plans. That leaves many of us in the middle.
10. ESA is a good law that is supported by a majority of people and needs to be strengthened.
11. If listing is eminent, then don't mislead us. Tell it like it is. We need opportunities to participate with others in water use management.
12. This is very serious here. There are eight communities up against it on water use and you're asking us to give up more.
13. DOE standards on aquifer recharge are at odds with your plan.
14. Take aggressive practices on predators. Go to state legislature for funding.
15. Habitat is a critical part of plan, but how will it be funded? Redirect money spent on hatcheries?
16. Don't redirect hatchery dollars, go for new money, contributions from others.
17. What's the funding for watershed groups? Nobody's paying anybody to raise habitat. If you can't make a living on your land you subdivide and then that doesn't do salmon any good. Hope the watershed group is actually <u>in</u> the watershed.
18. Manage riparian areas.
19. How do already established watershed groups fit in with this?

20. Most land is privately owned, so what incentives are there for us? Or will this force change?
21. Orchardists among best conservationists, so we need input from them. Trout Unlimited is working with them and with WDFW.
22. Your "measures" as what should be, and "standards" as what will be, won't matter in the final interpretation.
23. Wild salmon are important. Want information on what we can do to benefit fish and have clean water. Focus on full watersheds, rather than stream structures, etc. (As recommended by most recent science). Big landowners' actions can mean problems for small landowners.
24. WDFW has history of poor management and now wants to manage more land. Your buffer zones are dictation of how we manage our lands.
25. Agency obstacles to soil erosion control efforts.
26. Fly fishing club endorses habitat improvement.
27. We need more reservoirs to store conserved water to address water conservation problems.
28. Education needed on benefits of floodplain, riparian areas, etc. Grassroots habitat projects would bring peace of mind.
29. If we're serious about streamflows, if agriculture is part of solution with expectation to provide for fish, we need more structures to capture water during low water years.
30. TFW regs are in place already. Don't they work?
31. Why doesn't state stand up to feds on ESA?
32. WDFW doesn't consider neighbors, doesn't manage well. Wetlands create mosquito problems for me, but I can't spray. Why not consider my needs?
33. Concerned about private property rights. I can't develop my own wetlands, (by DOE standards?) But WDFW wants natural floodplains. Government agencies are crossing swords.
34. Cities and counties need to take a serious look at WSP habitat portion.

Wenatchee

1. **Response:** Comment noted. As part of policy implementation each wildlife area plan will be reviewed for consistency with the policy and plans amended as necessary to provide better protection for wild salmonids.
2. **Response:** If implementation resulted in taking, compensation could be awarded. WDFW will avoid taking through reasonable application of its authority.
3. **Response:** Comment noted.
4. **Response:** Comment noted. Chapter II and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
5. **Response:** Comment noted.
6. **Response:** The Wild Salmonid Policy includes many GMA elements and it is anticipated protection for wild salmonids would be better integrated into GMA land use plans and development ordinances as a result of locally-based watershed planning.
7. **Response:** Comment noted.
8. **Response:** Comment noted.
9. **Response:** Comment noted, perhaps watershed planning would provide more equity and incentives for small landowners.
10. **Response:** Comment noted.
11. **Response:** Comment noted.
12. **Response:** Comment noted.
13. **Response:** We disagree, aquifer recharge was meant the result from maintenance of permeable surfaces that would preclude recharge. An urbanization issue.
14. **Response:** Comment noted, see revised Chapters II and IV.
15. **Response:** Comment noted.
16. **Response:** Comment noted.
17. **Response:** The policy indicates this will be done in two basic ways (1) by increasing our coordination and collaboration withe other agencies on a frequent basis and (2) the Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
18. **Response:** We agree, revised Alternative 3 includes more management flexibility. Chapter II and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
19. **Response:** See response #17.
20. **Response:** See response #9.
21. **Response:** Comment noted.
22. **Response:** Comment noted.
23. **Response:** We agree, see revised Chapters III and V.
24. **Response:** As part of policy implementation each wildlife area plan will be reviewed for

consistency with the policy and plans amended as necessary to provide better protection for wild salmonids.

25. **Response:** Comment noted.
26. **Response:** Comment noted.
27. **Response:** See response #24.
28. **Response:** We agree.
29. **Response:** Comment noted. Stored water as a means to provide for human needs consistent with protection or recovery of wild salmonids should be considered in watershed planning.
30. **Response:** See response #4.
31. **Response:** Comment noted.
32. **Response:** See response # 24.
33. **Response:** Comment noted. The policy encourages better coordination, reconciliation of activities.
34. **Response:** We agree.

Responses to Wild Salmonid Policy
Public Meeting Comments

Habitat

Yakima

1. Where and when is baseline that you measured habitat from?
2. Concerned about fish extinct in Lower Yakima River; solve that problem first.
3. Don't see opportunity to vary from specifics in watersheds (Alternative #2); take out specifics.
4. Define "habitat" in Yakima County. Can't restrict maintenance work or you'll have crappy habitat in river basin.
5. WDFW has nothing at stake to be conservative, but landowners do. Why can't you be more precise so you don't have to be so conservative?
6. Watershed council in Yakima already with very political board members.
7. Why not put this through TFW?
8. Deficiencies with EIS process.
9. If we don't protect habitat we're cutting our own throats.
10. What efforts do you want to improve habitat and what incentives can you offer landowners to do them?
11. Provide tax breaks on green space.
12. How will this affect dams and electric power production? Could cause destruction from loss of electricity, etc. from dams being removed.
13. What's the role of the feds in this policy?
14. You're emphasizing fish, not agriculture, so compensate us for loss. It's "takings" (as in Hauge vs. USFS decision on reimbursement required).
15. This is not an EIS process; until it is, you're out of compliance.
16. What are long term effects on policy on land patents, water rights, and trust water rights? What are long term effects on agriculture, food, hay, and fiber production.
17. Needs some empirical work; for example, buffer amounts specified.
18. What's "regulatory default?"
19. What's a local group? How will groups be brought together? Tri-Cities area bypassed.
20. Use existing mechanisms (for group forming).
21. Further implement working relationships with agriculture and all others. Clear mechanism is local landowners.
22. Can't tell the difference between Alternatives #1 through 5.
23. Adopt Alternative #5 - do nothing more until TFW runs its course.
24. This resource can't wait for TFW to "run its course!"

25. Watershed groups need more than technical support. They need incentives. Collaborate with other agencies, don't protect turf.
26. Ambiguity is a big problem with this policy. Right now there's just lots of fear. Get more specific so we know what's up and then we can start to talk and work something out.
27. Missing a big part in not working with local conservation districts.
28. Resource as your client is OK with harvest and hatchery components, but not with habitat. Landowners are your clients with habitat.
29. This is a good document, but you have to have public behind you.
30. Lower four dams on Snake River need to come out.
31. Stronger language of influence of water quality on habitat. Also, water quantity issue as in instream flows.
32. Dams alter water temperatures and hurt fish.
33. When land use practices affect riparian habitat and other downstream use, it helps in the long run to protect your own property.
34. Need tougher buffer zones.
35. Public resources are on everyone's land. All of us have stewardship responsibilities.
36. This is not a good job of selling this product - and I & E failure.
37. We're not going to stop ESA listings, so what is incentive for landowners to help salmon? How do you protect us from losing our property if we do? Why start with this policy?
38. At what cost to citizens for taking their land? Willing into discovery? (Hauge vs. USFS)
39. One person's use affects another's. We have to work together.

Yakima

1. **Response:** Our frame of reference is the time before European settlement and habitat alteration.
2. **Response:** Comment noted. Priorities could be set for the basin as part of watershed planning.
3. **Response:** Alternative 3 keeps the specifics as guidance. If specifics don't apply and/or watershed planning can develop functional equivalents then local measures would apply.
4. **Response:** See Chapter V. We disagree that lack of maintenance creates poor habitat. The converse is generally true. In-stream maintenance may not provide meaningful flood damage reduction. In addition, maintenance in a stream reach may merely transfer impacts to downstream areas.
5. **Response:** Specifics would come from watershed planning, see also response #3.
6. **Response:** The policy indicates this will be done in two basic ways (1) by increasing our coordination and collaboration withe other agencies on a frequent basis and (2) the Governor has formed a Joint Natural Resources Cabinet (JNRC) that has been instructed by the Governor to develop strategies to address water and ESA/salmon issues. WDFW is on the JNRC. We understand JNRC will also examine the role, make-up and process of watershed councils. The legislature will likely also be involved in this issue providing direction and funding.
7. **Response:** Chapter II and V have been revised to give more credit for the efforts of forest and landowners and to provide them more management flexibility. The TFW forestry module efforts are included as part of the preferred alternative (Alternative 3).
8. **Response:** Comment noted.
9. **Response:** We agree.
10. **Response:** See Appendix C for action strategies recommended to achieve the habitat performance measures.
11. **Response:** We agree.
12. **Response:** The policy could result in operational changes in flow regimes that could affect power generation.
13. **Response:** The role of the federal government is minimal in this policy development but the policy will be used as guidance for WDFW when dealing with federal agencies. In addition, the policy calls for increased coordination with the federal agencies and encourages federal agencies to participate in watershed planning.
14. **Response:** If implementation resulted in taking, compensation could be awarded. WDFW will avoid taking through reasonable application of its authority.
15. **Response:** Comment noted,
16. **Response:** This level of details is beyond the scope of the EIS.
17. **Response:** Comment noted.
18. **Response:** In Alternative 4, "regulatory default" means if the local planning process does not adopt the recommended measures or functional equivalents, the recommended measures would become required standards.
19. **Response:** See response #6.
20. **Response:** See response #6.
21. **Response:** Comment noted.

22. **Response:** Comment noted, see revised language in Chapters III and V.
23. **Response:** Comment noted.
24. **Response:** Comment noted.
25. **Response:** Comment noted.
26. **Response:** See responses #3 and #5.
27. **Response:** We agree, we will increase our efforts.
28. **Response:** Comment noted.
29. **Response:** We agree.
30. **Response:** Comment noted.
31. **Response:** Comment noted.
32. **Response:** We agree.
33. **Response:** Comment noted.
34. **Response:** We agree that buffers should be increased.
35. **Response:** We agree.
36. **Response:** Comment noted.
37. **Response:** In the short term the WSP probably will not forestall listings, however it will serve as an underpinnings for preparation of recovery plans.
38. **Response:** This level of detail is beyond the scope of the EIS.
39. **Response:** We agree.

Appendix J Public Comments

Appendix J list of people who provided written response to the wild salmonid policy during the comment period through June 21, 1997. The response number corresponds to the comment number. Multiple responses from the same person have different numbers.

1 McLeod, Ken-Steelhead Trout Club of WA
2 Pfeiffer, Anthony
3 Townsend, Douglas
4 Young, Curt-Snoqualmie Wildlife Area Manager, WDFW
5 Utter, Fred-School of Fisheries University of WA
6 Nowandnick, George
7 Dickerson, Kathy
8 Linstrum, Jim
9 Heide, Peter - Plum Creek Timber Company. L.P.
10 Doherty family
11 Bosch, Bill
12 Shields, HW
13 Adams, Al
14 Young, Curt
15 McKee, Michael
16 Priebe, Dean - Longview Fibre Company
17 Greidl, John
18 Bob Lawrence, Okanogan Resource Council
19 Adler, Jason
20 Metzger, Rick
21 Mendel, Glen - WDFW
22 *e-mail with no comment-James Hearn*
23 Woods, Bill & Erin - Woods Tree Farm
24 Birch, Peter, no address provided
25 Gamache, Kay
26 Rogers, Dan
27 Collins, Laurie
28 Gamache, Ron
29 Menashe, Elliott-Greenbelt Consulting
30 Ehrenreich, John - landowner & professor of ecology, University of Idaho
31 Ingersoll, Jimmy
32 Collen, Don
33 Martin, Warren
34 Gary, Walter-WSU Walla Walla County Extension Agent
35 Richards, Skip
36 Olson, Gary
37 Veys, Jeff
38 Kriegel, Paul
39 Webster, Craig
40 Hiler, Dana - Puget Sound Sport Anglers, Bellingham Chapter Vice President
41 LeTourneau, Brian
42 Murphy, Jim
43 Stone, Virginia

44 Ersted, Dick
45 Washington Trout
46 Deem, Jeffrey
47 Konz, Steve
48 Giovanini, John
49 Baronid, Donald
50 Buck, Jim
51 Stoup, Robert
52 Blendermann, Walt
53 Forsland, Chuck
54 Moore, Shannon
55 Hurd, Julia
56 Kunze, Matt
57 Chudek, Al
58 Meyer, Ron
59 Kraemer, Curt - Area Fish Biologist, WDFW
60 Croskey, Robert
61 Broadhurst, Ginny
62 Frederick, Ray
63 Redman, Bill - Steelhead Committee, Federation of Fly Fishers
64 Petersen, Dale
65 Sund, Robert
66 Craig, Ron
67 Robbins, Bart
68 Lowrie, Ray
69 Hopkins, Donald
70 Sutherland, John & Lois
71 No name
72 Atkins, Richard
73 Olson, Paul
74 Marinkovich, Matt-Puget Sound Gillnettes Assoc. * does not pertain to WSP *
75 Gary, Walter - Washington State University *Same as 34*
76 Anderson, Claude - Washington Steelhead & Salmon River Trips, Owner/Guide
77 Michael, William - Quilcene-Snow Restoration Team, Wild Olympic Salmon
78 Farrar, John - Flyfishing Guide
79 Hiler, Dana * additional response *
80 Angioli, Terry
81 Royal, Stephen
82 Fischer, Polly
83 Williamson, Harvey
84 Carr, John
85 Ahmann, Grover
86 Meyer, Ron * Same as 58 *
87 Bowhay, Craig
88 Schoenthal, Galeon
89 Burdick, Robert
90 Ogilvie, Bill
91 Amato, Frank - Frank Amato Publications, Inc.

92 Schwarz, Robert
93 Clark, Hugh, M.D.
94 Kennon, Richard
95 Gilbert, John
96 Pattillo, Greg
97 Blendermann, Walt
98 Tracy, George
99 Berryman, Jack, PhD
100 Brening, Richard
101 Schorsch, David, Chair - Washington Fly Fishing Club
102 Van Gytrisgrisk, R.P. - Fly Fishing in Saltwaters
103 Jewell, Adam - F/V Provider
104 Johnson, Lester E.
105 Gagnon, J.
106 Beers, Glenn
107 Latham, Al - Jefferson County Conservation District
108 Pedersen, Steve - Forest Resources, Inc
109 Raymond, Steve
110 Mann, Mike
111 Leeuwenburg, Richard
112 Simonson, Don
113 Sass, Dick
114 Barrett, Lonnie
115 Redman, Bill - * Same as 63 *
116 Pitt, Larry
117 Gallerup, Dan
118 Van Natter, Peg
119 Daley, Wayne C.F.S. - Daley Design/Long Live The Kings
120 Pearson, Ted
121 Bucksbaum, Gene
122 Curtis, Richard
123 No name
124 Jewell, Adam * Same as 103 *
125 Hiler, Dana * Same as 79 *
126 Spearman, Bill
127 Hiler, Dana
128 Stargell, Aubrey - forester
129 Bellows, Chris
130 Harrison, Ben - forester
131 Malmgren, Nancy - Carkeek Watershed Community Action Project
132 Bakke, Bill - Native Fish Society
133 * staff modification proposal J on adipose clipping *
134 White, Jon, no address provided
135 Foster, Joe
136 McLeod, Ken * not WSP, sportfishing rules proposal*
137 Hiler, Dana
138 Finn, Earl JR
139 Rose, Leslie Ann

140 Kalberg, Erick
141 Brown, Lynn State Conservest - USDA
142 Elliott, Gary - President, Olympic Peninsula Flyfishers
143 Haag, W. V.
144 Schmeling, William
145 Johnson, Vernon
146 Hardin, Janet - Wild Olympic Salmon
147 Stinson, Doug
148 Stevens County Commissioners, Fran Bessermin, J. D. Anderson, Fred Lotze
149 Matthews, Stephen
150 Marks, Elliott - The Nature Conservancy, vVice President and State Director
151 Malone, John - Environmental Forestry
152 McConnaughey, Jay
153 Durward, William
154 Croskey, Robert
155 Hatfield, Doug
156 Baker, James - Sierra Club
157 Johnson, David L.
158 Brown, Lynn - USDA * Same as 141 *
159 Hearn, James * additional comments *
160 Goos, Ann - Forest Stewardship Manager, Boise Cascade Corporation
161 Thorsen, Dale
162 Dawley, L. C.
163 Johnson, Robert
164 Maccarrone, Rocco
165 Blake, Brian
166 Dehitt, Mark
167 No name
168 Marsland, Don & Sharon
169 Reisenbichler, Reg
170 Gerds, Fritz
171 Johnson, David
172 Kleinhoff, Jack - Riffe Lake Timber
173 Rankin, John
174 Columbia-Snake River Irrigators Association Board of Directors
175 Johnson, Howard
176 Boulton, John - Boulton Farms
177 Beatty, Danny
178 Hannar, Tony
179 Dewayne, Vetter - President, Kitsap Pogie Club
180 Altenburg, Henry
181 Hearn, Jim - * additional comments *
182 Wright, Terry
183 Kunze, Matt
184 Redman, Bill * additional comments *
185 Farr, John C. Jr. * additional comments *
186 No name
187 Williamson, Steve

188 Schmid, Charles
189 Huddleston, Larry
190 Medick, James
191 Carr, Eric
192 Koehn, Catherine
193 Faust, Linda
194 Rogers, Dan
195 McClellan, E.J.
196 Pattilo, Greg
197 Heller, Ray - King County Dept. of Nat. Res.
198 Keesling, Maxine
199 Round, David
200 Ballard, Charles
201 Davis, William
202 Emerson, Earl
203 Polayes-Wien, Joanne
204 Love, J.D. - Guide Service
205 Sunostrom, Roy
206 Weddle, Jim
207 Gronas, Donald
208 Thomas, Jim
209 Kuttel, Mike Jr.
210 Howell, Yvonne
211 Lewis, Bernard
212 Craig, Ronald
213 Kato, Walter
214 Beatty, Danny * additional comments *
215 Van De Mark, Richard
216 Nipper, Del
217 Finley, Carmel, no address provided
218 Brown, Lynn - State Conservest USDA * Same as 141 *
219 Isenberg, Phil, no address provided
220 Pinsch, Kathleen/Bertrand, Mary - The Chums of Barker Creek
221 No name
222 Corr, John
223 Harpham, Bruce
224 Thompson, Eric
225 Jones, Lucky
226 Winckler, Dave
227 Tryon, LeeAnne
228 Shaber, Randy
229 Loucks, Bryon - Loucks Forestry, Inc
230 Loucks, Donna - B & D Tree Farm
231 Fulling, Robert & 12 board of Dirs. - Columbia Basin Bass Club
232 Geppert, Rollie, WDFW
233 Boynton, Hal
234 Mathews, Stephen * Same as 149 *
235 Warman, Cindy - President, Icicle Valley Trout Unlimited

236 Endsley, Robert - Senior surface water technician, City of Bellingham/Bellingham Salmon Charters, Kulshan River Excursions
237 Heirman, Bob - Snohomish County Sportsmens Association
238 Blakenship, Lee - President, Professional Resource Organization -Salmon WPEA
239 Graham, John - Citizens for Sensible Development, no address provided
240 Tryon, LeeAnne * Same as 227 *
241 Mann, David - Washington Environmental Council
242 Kennon, Richard - President, Clark Skamania Flyfishers
243 Schloredt, Conrad
244 John Farrar - Flyfishing Guide * additional comments *
245 Danforth, Charolette - Director, Lewis County Farm Forestry
246 Martinis, John
247 Tri-State Steelheaders
248 Prager, T.
249 Marshall, Liz
250 Burns, Robert R - Lester Burns Family Limited Partnership
251 Schmidt, James
252 Burston, Marjone
253 Tracy, Kathleen & George
254 Willis, Sam
255 Evensen, John
256 Craig, Eugene
257 Baker, Kevin
258 * Comments on previous drafts of WSP *
259 Skocelas, Jeff
260 Anderson, Richard
261 Eling, Verne - Tree Farms, Hay, Produce Hunt Clubb Road
262 Drotts, John, Natural Resource Manager & Edward Goodridge, Chairmman - Stillaguamish Tribe of Indians
263 Crooker, David - Director Operations, Cascade Region, Plum Creek Timber Company, L.P.
264 Titland, John
265 MacFarlene, David - Pilchuck Audubon Society
266 Whitmore, Richard
267 Thoreen, J. Arn - President, Skagit Fisheries Enhancement Group
268 Blankenship, Lee - PRO-S
269 Rutter, Vern - Director, Hood Canal Environmental Council
270 Kavanaugh, Rob
271 Fitzsimmons, Tom - Department of Ecology
272 * timber harvest statistics 1988-1991 *
273 Allen, Dave
274 Hilborn, Ray and nine cosigners - Fisheries Research Institute, University of Washington
275 Burke, Mary - Washington Cattlemen's Association
276 Powers, Julian
277 No name * Jilllkl email*
278 Belcher, Jennifer - Commissioner of Public Lands
279 Loomis, Lorraine - Skagit System Cooperative
280 Carpenter, Lanny
281 Scheer, William - Streamacres Farms

282 Madrano, Joseph - President, South King County Chapter Trout Unlimited
283 Buck, Jim * Same as 50 *
284 Maroney, Joe - Kalispel Natural Resource Department
285 Svete, Irene
286 Crampton, Susan
287 Weston, Duane - Pilchuck Tree Farm
288 Gallagher, Sean
289 Ledbetter, Jim - King County Outdoor Sports Council
290 Thoreen, J. Arn * Same as 267 *
291 Schiouger, Walter
292 Linde, Tom
293 Winther, John - Winther Reality
294 Chastain, Marv - Rescue Elwha Area Lakes
295 Engle, Helen
296 Magill, Chris - Kitsap Audubon Society
297 Young, Hedwig & Frank
298 Baird, Pete
299 Baldwin, Leo
300 Starke, Gretchen - Vancouver Audubon Society
301 Lindholt, Paul Dr.
302 Lewis, Hugh
303 Rasmussen, Pat
304 Fox, Sherry - Tree Management Plus, Inc
305 Reebs, Lou
306 McLeod, Ken - Steelhead Trout Club of Washington * additional comments *
307 Hunberry, John W.
308 Clark, Gary
309 Kendy, Diane
310 Stone, Rick
311 Appel, Steve - President, Washington State Farm Bureau
312 Morisset, Mason - Law Offices Morisset, Schlosser, Ayer & Jozwiak
313 Buck, Jim * Same as 50 *
314 Lake Washington/Cedar River Watershed Forum - Signed by sixteen members
315 Scott, Joe
316 Engle, Helen * Same as 295 *
317 Liebow, Edward - Environmental Health & Social Policy Center
318 Wilkerson, William - Washington Forest Protection Association
319 Cathcart, James - The Campbell Group, Inc
320 Morris, David - US Department of Interior - National Park Service
321 Gruber, Elsa
322 Hendeson, Bud - A Hampton Affiliate
323 Creel, Dennis - Hampton Affiliates
324 Beal, John - President, Green/Duwamish Watershed Alliance
325 Miller, Wallace - Miller & Associates, Inc
326 Foote, Don
327 Fox, Thomas - Tree Management Plus, Inc
328 Friedman, Mitch - Executive Director, Northwest Ecosystem Alliance
329 McAfee, Jim - Pierce County Sportsmen’s Council

330 Sowinski, John
331 Lewis County Commissioners
332 Spanel, Les & Harriet
333 Hearn, James * additional comments *
334 Beardslee, Kurt - Washington Trout * comments on previous WSP drafts *
335 McIssac, D.O. - Oregon Department of Fish and Wildlife * comments on previous WSP drafts *
336 Soverel, Peter * comments on previous WSP drafts *
337 James, Jim - Willimette Industries, Inc
338 Kaczynski, V.W - Ph.D.
339 Wilcox, Tanya
340 Hoppler, Wesley
341 Lewis County Commissioners * Same as 331 *
342 Haskins, Scott - Director, resource Management Branch, Seattle Public Utilities
343 Young, Debbie - Natural resources Manager, Light Division, Tacoma Public Utilities
344 Campbell, Thomas - Vice President & Conservation Chair, Whidbey Audubon Society
345 Gruber, Elsa * Same as 321 *
346 Graham, Judith - Exective Director, Washington Trollers Association
347 Lamers, Eric
348 Kessler, Dara - Washington Kayak Club
349 Kelly, Barbara
350 Ferguson, Bruce
351 Pierre, Charles
352 Brunstad, Harold
353 Mayock, Melanie
354 Bailie, Rita & Bernie
355 Welch, Perry - President Board of Directors, Nooksack Salmon Enhancement Association
356 Kalbery, Erick * additional comments *
357 Kirkmire, George - Executive Assistant, Washington Contract Loggers Association
358 Best, Lynn - Acting Director, Environment and Safety Division. Seattle City Light
359 Bschor, Dennis - Forest Supervisor, Mt. Baker-Snoqualmie National Forest, US Department of Agriculture - Forest Service
360 Cedergreen, Mark - Exective Director, Westport Charterboat Association
361 Bob Lawerence, Secretary, & John Shaver, Chairman, Okanogan Resource Council
362 Conroy, Ed
363 Alexander, Steven
364 Fletcher, Kathy - Executive Director, People for Puget Sound
365 Pursley, Ron - Pursley Family Tree Farm
366 Rowe, Blake - Longview Fibre Company
367 Garner, Charles - President, Yakima Basin Joint Board
368 Noerenberg, Chan - President, Washington Farm Forestry Association
369 Bell, Harry - President, North Olympic Timber Action Committee
370 Hickey, Bill - Salmon Committee Chairman, Tacoma Poggie Club
371 No name
372 Briggs, Bruce - Briggs Nursery, Inc
373 Lanny Pillatos, Puget Sound Gillnetters Assn.
Pete Soverel, Wild Salmon Center
Pete Soverel, Chair, Steelhead Committee, Federation of Fly Fishers
Kurt Beardslee, Washington Trout

Mitch Friedman, NW Ecosystem Alliance
Tim Coleman, Kettle Range Conservation Group
Kathy Fletcher, People for Puget Sound
Mark Solomon, Inland Empire Public Lands Council
Peter Illyn, Green Cross Northwest
Peter Illyn, Christians for Environmental Stewardship
Jennifer Hickey, Waters and Salmon Committee, Sierra Club, Cascade Chapter
Nina Bell, NW Environmental Advocates
Michael Kundu, Pacific Northwest Coordinator, Sea Shepherd
Gary D. Woodmansee, Concerned Friends of Ferry County
Pat Rasmussen, Leavenworth Audubon Adopt-a-Foresrt
Karen Garrison, Northwest Water Project, Natral Resources Defense Council
Ed Liebow, Environmental Health and Sociall Policy Center
Thea Levkovitz, Washington Wildlife Federation
Jim Jontz, Western Ancient Forest Campaign
David Jennings, Consrevation Co-Chair, Black Hills Audubon Society
Bill M. Bakke, Native Fish Society
Tom Campbell, VP Whidbey Audubon Society
Geraldine Payton, Columbia River Bioregional Education Project
Peter Morrison, Methow Research Station, Sierra Biodiversity Institute
Amy Schlachtenhaufen, LightHawk
Margaret Holm Rader, Secretary, Chehalis River Counci
Alex Bradberry, Quilcene Ancient Forest Coalition
David Bayles, conservation Director, Pacific Rivers Council
Matt Lincecum, Washington Wilderness Coalition
David Ward, Pilchuck Audubon Society
Sherilyn Wells, President, Watershed Defense Fund
Fred Felleman, NW Director, Ocean Advocates
Meg Roellich, P.O.E.T., Newport, WA

374 Gruber, Elsa * Same as 321 *
375 Soverel, Peter - President, The Wild Salmon Center
376 Eaton, Bob - Executive Director, Salmon for All
377 Revesz, Jane & Peter - Tree Farmers
378 Graham, Judy, Washington Trollers Association * Same as 346 *
379 Larsen, Rob
380 Lebon, Geoff - RFEG Advisory Board
381 McCaul, Gene, no address provided
382 Welch, Perry - * Same as 355 *
383 Campbell, Tom & Ann - Peace & Plenty Farm * Same as 344 *
384 Anderson, Robert - President, Mid Puget Sound Fisheries Enhancement Group
385 White, Jacques - People for Puget Sound
386 Hearn, James * additional Comments *
387 Robinson, David - Kettle Range Conservation Group
388 Rasmussen, Pat - Leavenworth Audubon Adopt-a-Forest
389 Schultz, Ron - National Audubon Society
390 Wilson, Patricia - The Willapa Alliance
391 Northwest Sportfishing Association
392 Sitko, Hank - Executive Director, Northwest Marine Trade Association

393 Wallin, Phillip - President, River Network
394 Bell, Harry - North Olympic Timber Action Committee
395 Sudar, Robert
396 Snyder, Karen - Chair, The Willapa Alliance
397 Schwickerath, Dean - Conservation Chair, Grays Harbor Audubon Society
398 Hanson, Nels
399 Bob Johnson, Norwest Steelhead and Salmon Council, Trout Unlimited
400 Hanson, Marcia - President, The Mountaineers
401 Tinoco, Isabel - Muckleshoot Indian Tribe
402 Young, Vernon/Ferguson, Bruce - WA Council Federation of Fly Fishers
403 Ferguson, Bruce * Same as 350 *
404 Schroeder, Pete - North Olympic Salmon Coalition
405 Mokay, Nancy - Chair, Puget Sound Water Quality Action Team
406 Rose, Ruth & Robert
407 Hood, Steven - Watershed Coordinator, Nooksack Recovery Team
408 Eaton, Bob * Same as 376 *
409 Wood, George/McGregor, Alex - Washington Association of Wheat Growers
410 Clallam County Commissioner's Office
411 Zimmerman, Gregg, P.E. - Administrator, City of Renton
412 Osborne, Michelle - Center for Environmental Law & Policy
413 Pickering, Fred - Pickering Tree Farm
414 No name
415 Goodwin, Richard - Goodwin Tree Farm
416 Walker, Evaret
417 Tynan, Tim - WDFW
418 Smith, Blake - Fish Biologist, Puyallup Fisheries
419 Gudgell, Milton - Pacific Salmon Charters
420 Boynton, Hal
421 Hopper, Wes, no address provided
422 Spear, Robert Ph.D.
423 Schultz, Ron
424 Fanning, Rory
425 Owens, Ed -Coalition of Coastal Fisheries
426 Lake, Bob - Willipa Bay Gillnetters/Enhancement Group
427 Wood, Dan - WA Sate Farm Bureau
428 Gorman, John - Simpson Timber Co.
429 Thompson, Julie - WA Forest Protection Association
430 Overton, Peter
431 Boynton, Hal
432 Creel, Dennis - Hampton Resources, Inc
433 Kelly, John - King County Outdoor Sports Council
434 Olson, Jim
435 Boyd, Wade - Longview Fibre Co
436 Overton, Peter
437 Nelson, Rick - WA Cattlemen's Assn
438 Cerniwey, Frank
439 Pedersen, Steve - Lewis County Farm Forestry
440 Karlovich, Larry - WA Steelhead Flyfishing Club (member)

441 Laymor, Robert
442 WA Trollers Association
443 Fricke, Doug - WA Trollers Association
444 Shindler, Ray - WA Association of Wheat Growers
445 Clark, Gary
446 Schorsch, David - WA Flyfishing Club
447 Myrum, Thomas - WA State Water Resources Association
448 Schorsch, David - WA Flyfishing Club
449 Stinson, Doug
450 Hearn, James
451 Hanson, Nels - WA Farm Fprestry Association
452 Myrum, Tom - WA State Water Resources Association
453 Autt, Matthew
454 Heide, Peter - Plum Creek Timber Co.
455 Olsen, Darryll - Columbia-Snake River Irrigation Association
456 Thoennissen, Hermann - WA State Hort. Association
457 Ehrenreich, John - WA Forest Protection Assoc.
458 Murray, Julie - WA State Farm Bureau
459 Jackson, Don - Columbia County
460 Clark, Gary
461 Appel, Steve - WA State Farm Bureau
462 Olsen, Darryll - Columbia-Snake Irrigators Association
463 Heide, Peter - Plum Creek Timber Co
464 Schultz, Ron - National Audubon Society
465 Hanson, Nels - WA Farm Foresty Assoc
466 Hearn, Jim
467 Appel, Steve
468 Bschor, Dennis - US Department of Agriculture * Same as 359 *
469 Anderson, Dave - State Represenative
470 Fleming, Wm
471 American Fisheries Society
472 Feigner, Ken - Environmental Protection Agency

Appendix J alphabetized list of people who provided written response to the wild salmonid policy during the comment period through June 21, 1997. The response number corresponds to the comment number. Multiple responses from the same person have different numbers.

258 * Comments on previous drafts of WSP *
133 * staff modification proposal J on adipose clipping *
272 * timber harvest statistics 1988-1991 *
22 *e-mail with no comment-James Hearn*
13 Adams, Al
19 Adler, Jason
85 Ahmann, Grover
373 Alex Bradberry - Quilcene Ancient Forest Coalition
363 Alexander, Steven
273 Allen, Dave
180 Altenburg, Henry
91 Amato, Frank - Frank Amato Publications, Inc.
471 American Fisheries Society
373 Amy Schlachtenhaufen - LightHawk
260 Anderson, Richard
384 Anderson, Robert - President, Mid Puget Sound Fisheries Enhancement Group
469 Anderson, Dave - State Representative
76 Anderson, Claude - Washington Steelhead & Salmon River Trips, Owner/Guide
80 Angioli, Terry
311 Appel, Steve - President, Washington State Farm Bureau
467 Appel, Steve
461 Appel, Steve - WA State Farm Bureau
72 Atkins, Richard
453 Autt, Matthew
354 Bailie, Rita & Bernie
298 Baird, Pete
156 Baker, James - Sierra Club
257 Baker, Kevin
132 Bakke, Bill - Native Fish Society
299 Baldwin, Leo
200 Ballard, Charles
49 Baronid, Donald
114 Barrett, Lonnie
324 Beal, John - President, Green/Duwamish Watershed Alliance
334 Beardslee, Kurt - Washington Trout * comments on previous WSP drafts *
214 Beatty, Danny * additional comments *
177 Beatty, Danny
106 Beers, Glenn
278 Belcher, Jennifer - Commissioner of Public Lands

394 Bell, Harry - North Olympic Timber Action Committee
369 Bell, Harry - President, North Olympic Timber Action Committee
129 Bellows, Chris
99 Berryman, Jack, PhD
358 Best, Lynn - Acting Director, Environment and Safety Division, Seattle City Light
373 Bill M. Bakke, Native Fish Society
24 Birch, Peter
165 Blake, Brian
238 Blakenship, Lee - President, Professional Resource Organization -Salmon WPEA
268 Blankenship, Lee - PRO-S
52 Blendermann, Walt
97 Blendermann, Walt
18 Bob Lawrence, Okanogan Resource Council
361 Bob Lawerence, Secretary, & John Shaver, Chairman, Okanogan Resource Council
399 Bob Johnson, Norwest Steelhead and Salmon Council, Trout Unlimited
11 Bosch, Bill
176 Boulton, John - Boulton Farms
87 Bowhay, Craig
435 Boyd, Wade - Longview Fibre Co
431 Boynton, Hal
233 Boynton, Hal
420 Boynton, Hal
100 Brening, Richard
372 Briggs, Bruce - Briggs Nursery, Inc
61 Broadhurst, Ginny
158 Brown, Lynn - USDA * Same as 141 *
218 Brown, Lynn - State Conservest USDA * Same as 141 *
141 Brown, Lynn State Conservest - USDA
352 Brunstad, Harold
359 Bschor, Dennis - Forest Supervisor, Mt. Baker-Snoqualmie National Forest, US Department of Agriculture - Forest Service
468 Bschor, Dennis - US Department of Agriculture * Same as 359 *
283 Buck, Jim * Same as 50 *
50 Buck, Jim
313 Buck, Jim * Same as 50 *
121 Bucksbaum, Gene
89 Burdick, Robert
275 Burke, Mary - Washington Cattlemen's Association
250 Burns, Robert R - Lester Burns Family Limited Partnership
252 Burston, Marjone
383 Campbell, Tom & Ann - Peace & Plenty Farm * Same as 344 *
344 Campbell, Thomas - Vice President & Conservation Chair, Whidbey Audubon Society
280 Carpenter, Lanny

191 Carr, Eric
84 Carr, John
319 Cathcart, James - The Campbell Group, Inc
360 Cedergreen, Mark - Executive Director, Westport Charterboat Association
438 Cerniwey, Frank
294 Chastain, Marv - Rescue Elwha Area Lakes
57 Chudek, Al
410 Clallam County Commissioner's Office
93 Clark, Hugh, M.D.
308 Clark, Gary
445 Clark, Gary
460 Clark, Gary
32 Collen, Don
27 Collins, Laurie
174 Columbia-Snake River Irrigators Association Board of Directors
362 Conroy, Ed
222 Corr, John
256 Craig, Eugene
212 Craig, Ronald
66 Craig, Ron
286 Crampton, Susan
432 Creel, Dennis - Hampton Resources, Inc
323 Creel, Dennis - Hampton Affiliates
263 Crooker, David - Director Operations, Cascade Region, Plum Creek Timber Company
154 Croskey, Robert
60 Croskey, Robert
122 Curtis, Richard
119 Daley, Wayne C.F.S. - Daley Design/Long Live The Kings
245 Danforth, Charolette - Director, Lewis County Farm Forestry
373 David Jennings, Conservation Co-Chair, Black Hills Audubon Society
373 David Bayles, Conservation Director, Pacific Rivers Council
373 David Ward, Pilchuck Audubon Society
201 Davis, William
162 Dawley, L. C.
46 Deem, Jeffrey
166 Dehitt, Mark
179 Dewane, Vetter - President, Kitsap Poggie Club
7 Dickerson, Kathy
10 Doherty Family
262 Drotts, John, Natural Resource Manager & Edward Goodridge, Chairmman - Stillaguamish Tribe of Indians
153 Durward, William
376 Eaton, Bob - Executive Director, Salmon for All

408 Eaton, Bob * Same as 376 *
373 Ed Liebow, Environmental Health and Social Policy Center
457 Ehrenreich, John - WA Forest Protection Assoc.
30 Ehrenreich, John - Landowner & Professor of Ecology, University of Idaho
261 Eling, Verne - Tree Farms, Hay, Produce Hunt Club Road
142 Elliott, Gary - President, Olympic Peninsula Flyfishers
202 Emerson, Earl
236 Endsley, Robert - Senior surface water technician, City of Bellingham/Bellingham Salmon Charters, Kulshan River Excursions
316 Engle, Helen * Same as 295 *
295 Engle, Helen
44 Ersted, Dick
255 Evensen, John
424 Fanning, Rory
185 Farr, John C. Jr. * additional comments *
78 Farrar, John - Flyfishing Guide
193 Faust, Linda
472 Feigner, Ken - Environmental Protection Agency
350 Ferguson, Bruce
403 Ferguson, Bruce * Same as 350 *
217 Finley, Carmel
138 Finn, Earl JR
82 Fischer, Polly
271 Fitzsimmons, Tom - Department of Ecology
470 Fleming, Wm
364 Fletcher, Kathy - Executive Director, People for Puget Sound
326 Foote, Don
53 Forsland, Chuck
135 Foster, Joe
304 Fox, Sherry - Tree Management Plus, Inc
327 Fox, Thomas - Tree Management Plus, Inc
373 Fred Felleman - NW Director, Ocean Advocates
62 Frederick, Ray
443 Fricke, Doug - WA Trollers Association
328 Friedman, Mitch - Executive Director, Northwest Ecosystem Alliance
231 Fulling, Robert & 12 Board of Directors - Columbia Basin Bass Club
105 Gagnon, J.
288 Gallagher, Sean
117 Gallerup, Dan
25 Gamache, Kay
28 Gamache, Ron
367 Garner, Charles - President, Yakima Basin Joint Board
75 Gary, Walter - Washington State University *Same as 34*

373 Gary D. Woodmansee - Concerned Friends of Ferry County
34 Gary, Walter-WSU Walla Walla County Extension Agent
232 Geppert, Rollie, WDFW
373 Geraldine Payton, Columbia River Bioregional Education Project
170 Gerds, Fritz
95 Gilbert, John
48 Giovanini, John
415 Goodwin, Richard - Goodwin Tree Farm
160 Goos, Ann - Forest Stewardship Manager, Boise Cascade Corporation
428 Gorman, John - Simpson Timber Co.
346 Graham, Judith - Executive Director, Washington Trollers Association
378 Graham, Judie, Washington Trollers Association * Same as 346 *
239 Graham, John - Citizens for Sensible Development
17 Greidl, John
207 Gronas, Donald
374 Gruber, Elsa * Same as 321 *
321 Gruber, Elsa
345 Gruber, Elsa * Same as 321 *
419 Gudgell, Milton - Pacific Salmon Charters
143 Haag, W. V.
178 Hannar, Tony
400 Hanson, Marcia - President, The Mountaineers
398 Hanson, Nels
465 Hanson, Nels - WA Farm Forestry Association
451 Hanson, Nels - WA Farm Forestry Association
146 Hardin, Janet - Wild Olympic Salmon
223 Harphan, Bruce
130 Harrison, Ben - forester
342 Haskins, Scott - Director, Resource Management Branch, Seattle Public Utilities
155 Hatfield, Doug
333 Hearn, James * additional comments *
450 Hearn, James
466 Hearn, Jim
159 Hearn, James * additional comments *
181 Hearn, Jim - * additional comments *
386 Hearn, James * additional Comments *
454 Heide, Peter - Plum Creek Timber Co.
9 Heide, Peter - Plum Creek Timber Company. L.P.
463 Heide, Peter - Plum Creek Timber Co
237 Heirman, Bob - Snohomish County Sportsmens Association
197 Heller, Ray - King County Dept. of Nat. Res.
322 Hendeson, Bud - A Hampton Affiliate
370 Hickey, Bill - Salmon Committee Chairman, Tacoma Poggie Club

274 Hilborn, Ray and nine cosigners - Fisheries Research Institute, University of Washington
137 Hiler, Dana
79 Hiler, Dana * additional response *
125 Hiler, Dana * Same as 79 *
127 Hiler, Dana
40 Hiler, Dana - Puget Sound Sport Anglers, Bellingham Chapter Vice President
407 Hood, Steven - Watershed Coordinator, Nooksack Recovery Team
69 Hopkins, Donald
421 Hopper, Wes
340 Hoppler, Wesley
210 Howell, Yvonne
189 Huddleston, Larry
307 Hunberry, John W.
55 Hurd, Julia
31 Ingersoll, Jimmy
219 Isenberg, Phil
459 Jackson, Don - Columbia County
337 James, Jim - Willimette Industries, Inc
373 Jennifer Hickey, Waters and Salmon Committee, Sierra Club, Cascade Chapter
103 Jewell, Adam - F/V Provider
124 Jewell, Adam * Same as 103 *
373 Jim Jontz, Western Ancient Forest Campaign
244 John Farrar - Flyfishing Guide * additional comments *
104 Johnson, Lester E.
163 Johnson, Robert
175 Johnson, Howard
157 Johnson, David L.
145 Johnson, Vernon
171 Johnson, David
225 Jones, Lucky
338 Kaczynski, V.W - Ph.D.
140 Kalberg, Erick
356 Kalbery, Erick * additional comments *
373 Karen Garrison, Northwest Water Project, Natural Resources Defense Council
440 Karlovich, Larry - WA Steelhead Flyfishing Club (member)
373 Kathy Fletcher, People for Puget Sound
213 Kato, Walter
270 Kavanaugh, Rob
198 Keesling, Maxine
349 Kelly, Barbara
433 Kelly, John - King County Outdoor Sports Council
309 Kendy, Diane
242 Kennon, Richard - President, Clark Skamania Flyfishers

94 Kennon, Richard
348 Kessler, Dara - Washington Kayak Club
357 Kirkmire, George - Executive Assistant, Washington Contract Loggers Association
172 Kleinhoff, Jack - Riffe Lake Timber
192 Koehn, Catherine
47 Konz, Steve
59 Kraemer, Curt - Area Fish Biologist, WDFW
38 Kriegel, Paul
56 Kunze, Matt
183 Kunze, Matt
373 Kurt Beardslee, Washington Trout
209 Kuttel, Mike JR
314 Lake Washington/Cedar River Watershed Forum - Signed by sixteen members
426 Lake, Bob - Willipa Bay Gillnetters/Enhancement Group
347 Lamers, Eric
373 Lanny Pillatos, Puget Sound Gillnetters Assn.
379 Larsen, Rob
107 Latham, Al - Jefferson County Conservation District
441 Laymor, Robert
380 Lebon, Geoff - RFEG Advisory Board
289 Ledbetter, Jim - King County Outdoor Sports Council
111 Leeuwenburg, Richard
41 LeTourneau, Brian
331 Lewis County Commissioners
341 Lewis County Commissioners * Same as 331 *
302 Lewis, Hugh
211 Lewis, Bernard
317 Liebow, Edward - Environmental Health & Social Policy Center
292 Linde, Tom
301 Lindholt, Paul Dr.
8 Linstrum, Jim
279 Loomis, Lorraine - Skagit System Cooperative
230 Loucks, Donna - B & D Tree Farm
229 Loucks, Bryon - Loucks Forestry, Inc
204 Love, J.D. - Guide Service
68 Lowrie, Ray
164 Maccarrone, Rocco
265 MacFarlene, David - Pilchuck Audubon Society
282 Madrano, Joseph - President, South King County Chapter Trout Unlimited
296 Magill, Chris - Kitsap Audubon Society
131 Malmgren, Nancy - Carkeek Watershed Community Action Project
151 Malone, John - Environmental Forestry
241 Mann, David - Washington Environmental Council

110 Mann, Mike
373 Margaret Holm Rader, Secretary, Chehalis River Counci
74 Marinkovich, Matt-Puget Sound Gillnettes Assoc. * does not pertain to WSP *
373 Mark Solomon, Inland Empire Public Lands Council
150 Marks, Elliott - The Nature Conservancy, Vice President and State Director
284 Maroney, Joe - Kalispel Natural Resource Department
249 Marshall, Liz
168 Marsland, Don & Sharon
33 Martin, Warren
246 Martinis, John
234 Mathews, Stephen * Same as 149 *
373 Matt Lincecum, Washington Wilderness Coalition
149 Matthews, Stephen
353 Mayock, Melanie
329 McAfee, Jim - Pierce County Sportsmen's Council
381 McCaul, Gene
195 McClellan, E.J.
152 McConnaughey, Jay
335 McIssac, D.O. - Oregon Department of Fish and Wildlife * comments on previous WSP drafts *
15 McKee, Michael
136 McLeod, Ken * not WSP, sportfishing rules proposal*
1 McLeod, Ken-Steelhead Trout Club of WA
306 McLeod, Ken - Steelhead Trout Club of Washington * additional comments *
190 Medick, James
373 Meg Roellich, P.O.E.T., Newport, WA
29 Menashe, Elliott-Greenbelt Consulting
21 Mendel, Glen - WDFW
20 Metzger, Rick
58 Meyer, Ron
86 Meyer, Ron * Same as 58 *
373 Michael Kundu, Pacific Northwest Coordinator, Sea Shepherd
77 Michael, William - Quilcene-Snow Restoration Team, Wild Olympic Salmon
325 Miller, Wallace - Miller & Associates, Inc
373 Mitch Friedman, NW Ecosystem Alliance
405 Mokay, Nancy - Chair, Puget Sound Water Quality Action Team
54 Moore, Shannon
312 Morisset, Mason - Law Offices Morisset, Schlosser, Ayer & Jozwiak
320 Morris, David - US Department of Interior - National Park Service
42 Murphy, Jim
458 Murray, Julie - WA State Farm Bureau
452 Myrum, Tom - WA State Water Resources Association
447 Myrum, Thomas - WA State Water Resources Association
437 Nelson, Rick - WA Cattlemen's Assn

373 Nina Bell, NW Environmental Advocates
216 Nipper, Del
71 No name
414 No name
371 No name
277 No name * Jilllkl email*
221 No name
123 No name
186 No name
167 No name
368 Noerenberg, Chan - President, Washington Farm Forestry Association
391 Northwest Sportfishing Association
6 Nowandnick, George
90 Ogilvie, Bill
455 Olsen, Darryll - Columbia-Snake River Irrigation Association
462 Olsen, Darryll - Columbia-Snake Irrigation Association
434 Olson, Jim
36 Olson, Gary
73 Olson, Paul
412 Osborne, Michelle - Center for Environmental Law & Policy
430 Overton, Peter
436 Overton, Peter
425 Owens, Ed -Coalition of Coastal Fisheries
303 Pasmussen, Pat
373 Pat Rasmussen, Leavenworth Audubon Adopt-a-Forest
96 Pattillo, Greg
196 Pattilo, Greg
120 Pearson, Ted
439 Pedersen, Steve - Lewis County Farm Forestry
108 Pedersen, Steve - Forest Resources, Inc
373 Pete Soverel, Wild Salmon Center
373 Pete Soverel, Chair, Steelhead Committee, Federation of Fly Fishers
373 Peter Illyn, Christians for Environmental Stewardship
373 Peter Morrison, Methow Research Station, Sierra Biodiversity Institute
373 Peter Illyn, Green Cross Northwest
64 Petersen, Dale
2 Pfeiffer, Anthony
413 Pickering, Fred - Pickering Tree Farm
351 Pierre, Charles
220 Pinsch, Kathleen/Bertrand, Mary - The Chums of Barker Creek
116 Pitt, Larry
203 Polayes-Wien, Joanne
276 Powers, Julian

248 Prager, T.
16 Priebe, Dean - Longview Fibre Company
365 Pursley, Ron - Pursley Family Tree Farm
173 Rankin, John
388 Rasmussen, Pat - Leavenworth Audubon Adopt-a-Forest
109 Raymond, Steve
63 Redman, Bill - Steelhead Committee, Federation of Fly Fishers
115 Redman, Bill - * Same as 63 *
184 Redman, Bill * additional comments *
305 Reebs, Lou
169 Reisenbichler, Reg
377 Revesz, Jane & Peter - Tree Farmers
35 Richards, Skip
67 Robbins, Bart
387 Robinson, David - Kettle Range Conservation Group
26 Rogers, Dan
194 Rogers, Dan
406 Rose, Ruth & Robert
139 Rose, Leslie Ann
199 Round, David
366 Rowe, Blake - Longview Fibre Company
81 Royal, Stephen
269 Rutter, Vern - Director, Hood Canal Environmental Council
113 Sass, Dick
281 Scheer, William - Streamacres Farms
291 Schiouger, Walter
243 Schloredt, Conrad
144 Schmeling, William
188 Schmid, Charles
251 Schmidt, James
88 Schoenthal, Galeon
448 Schorsch, David - WA Flyfishing Club
101 Schorsch, David, Chair - Washington Fly Fishing Club
446 Schorsch, David - WA Flyfishing Club
404 Schroeder, Pete - North Olympic Salmon Coalition
423 Schultz, Ron
389 Schultz, Ron - National Audubon Society
464 Schultz, Ron - National Audubon Society
92 Schwarz, Robert
397 Schwickerath, Dean - Conservation Chair, Grays Harbor Audubon Society
315 Scott, Joe
228 Shaber, Randy
373 Sherilyn Wells, President, Watershed Defense Fund

12 Shields, HW
444 Shindler, Ray - WA Association of Wheat Growers
112 Simonson, Don
392 Sitko, Hank - Executive Director, Northwest Marine Trade Association
259 Skocelas, Jeff
418 Smith, Blake - Fish Biologist, Puyallup Fisheries
396 Snyder, Karen - Chair, The Willapa Alliance
375 Soverel, Peter - President, The Wild Salmon Center
336 Soverel, Peter * comments on previous WSP drafts *
330 Sowinski, John
332 Spanel, Les & Harriet
422 Spear, Robert Ph.D.
126 Spearman, Bill
128 Stargell, Aubrey - forester
300 Starke, Gretchen - Vancouver Audubon Society
148 Stevens County Commissioners, Fran Bessermin, J. D. Anderson, Fred Lotze
147 Stinson, Doug
449 Stinson, Doug
310 Stone, Rick
43 Stone, Virginia
51 Stoup, Robert
395 Sudar, Robert
65 Sund, Robert
205 Sunostrom, Roy
70 Sutherland, John & Lois
285 Svete, Irene
373 Thea Levkovitz, Washington Wildlife Federation
456 Thoennissen, Hermann - WA State Hort. Association
208 Thomas, Jim
429 Thompson, Julie - WA Forest Protection Association
224 Thompson, Eric
267 Thoreen, J. Arn - President, Skagit Fisheries Enhancement Group
290 Thoreen, J. Arn * Same as 267 *
161 Thorsen, Dale
373 Tim Coleman, Kettle Range Conservation Group
401 Tinoco, Isabel - Muckleshoot Indian Tribe
264 Titland, John
373 Tom Campbell, VP Whidbey Audubon Society
3 Townsend, Douglas
253 Tracy, Kathleen & George
98 Tracy, George
247 Tri-State Steelheaders
227 Tryon, LeeAnne

240 Tryon, LeeAnne * Same as 227 *
417 Tynan, Tim - WDFW
5 Utter, Fred-School of Fisheries University of WA
215 Van De Mark, Richard
102 Van Gytrisgrisk, R.P. - Fly Fishing in Saltwaters
118 Van Natter, Peg
37 Veys, Jeff
442 WA Trollers Association
416 Walker, Evaret
393 Wallin, Phillip - President, River Network
235 Warman, Cindy - President, Icicle Valley Trout Unlimited
45 Washington Trout
39 Webster, Craig
206 Weddle, Jim
382 Welch, Perry - * Same as 355 *
355 Welch, Perry - President Board of Directors, Nooksack Salmon Enhancement Association
287 Weston, Duane - Pilchuck Tree Farm
134 White, Jon
385 White, Jacques - People for Puget Sound
266 Whitmore, Richard
339 Wilcox, Tanya
318 Wilkerson, William - Washington Forest Protection Association
83 Williamson, Harvey
187 Williamson, Steve
254 Willis, Sam
390 Wilson, Patricia - The Willapa Alliance
226 Winckler
293 Winther, John - Winther Reality
409 Wood, George/McGregor, Alex - Washington Association of Wheat Growers
427 Wood, Dan - WA Sate Farm Bureau
23 Woods, Bill & Erin - Woods Tree Farm
182 Wright, Terry
14 Young, Curt
402 Young, Vernon/Ferguson, Bruce - WA Council Federation of Fly Fishers
343 Young, Debbie - Natural Resources Manager, Light Division, Tacoma Public Utilities
4 Young, Curt-Snoqualmie Wildlife Area Manager, WDFW
297 Young, Hedwig & Frank
411 Zimmerman, Gregg, P.E. - Administrator, City of Renton

Responses to Written Comments to Fish Population Management Element for the Wild Salmonid Policy EIS

1 **Comment:** Despite its theoretical foundation, MSY is a harvest-driven term and management concept which is a legacy of the industrial, commodity-oriented conception of natural ecosystems which is largely responsible for the current crisis on ecosystem health. It is, furthermore, grounded in a concept of "stock-recruitment relationships" between spawner numbers and numbers of returning adults in subsequent generations which, though correct in general for each stock, requires detailed data that rarely exist and which has rarely been a management priority to secure. Managers using MSY always default to estimates of actual spawner-recruit relationships which more often than not err on the side of harvest interests, and impose significant risks to long-term stock health.

45, 159, 320, 399, 471

Response: The issues described above have been addressed in revisions to Chapters II and IV plus Appendices B, D, F and G.

---

2 **Comment:** While the legislature and the taxpayers are grateful that the DEIS acknowledges past failures of the department to accomplish its mission, the department and commission may rest assured that further failure will not be tolerated. It is hoped that we will learn from past mistakes and use this knowledge to avoid similar failures in the future. Your clients are the taxpayers and your mission is to preserve, protect and perpetuate fish.

50

Response: We generally agree with this comment. However, when we begin with exactly the same "mission" (to preserve, protect and perpetuate fish) this leads us to a conclusion that the fish are our "client." This is based mainly on the actual case histories of management successes and failures by other managers.

---

3 **Comment:** The WSP ought to mandate a stock-by-stock management program rather than aggregate collections of stocks into management units. Aggregation increases risk, especially to small less productive populations. These small populations should be the bellwether of the WSP. If the small, less productive populations cannot be maintained through this policy then it will fail to maintain biological diversity, evolutionary potential and genetic variation of adapted stocks within each species.

132, 320

Response: We agree and have made revisions to Chapters II and IV to strengthen the case for stock-by-stock management.

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4 **Comment:** WDFW argues MSY rather than MSE can be used to rebuild wild stocks, protect local adaptations and genetic diversity, but does not explain this assumption. Certainly it has not been

used to accomplish these good goals in the past. The discussion should explain how it has been used to cause the decline in stocks and how it can be used to protect the stocks according to the policy. In addition, the MSY or MSE standard must address ecological functions. The numerical value of these standards should be based on delivering specific ecological values.

132, 159, 320, 399, 471

Response: We agree. Chapters II and IV have been revised to address these concerns as well as Appendices B, D, F, and G.

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5 **Comment:** WDFW assumes the management unit at the stock level will provide benefits of fine scale (substock structure management) at less cost and allow more harvest. Yes, maybe this is so, but at what risk. A risk analysis of this "assumption" must be done. This assumption places small less productive stocks, or substocks at risk.

132, 320

Response: Chapters II and IV have been revised to describe a more realistic (and less optimistic) description of the "management unit" approach used in Alternatives 1, 4, and 5.

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6 **Comment:** MSY is a harvest/commodity production model that assumes salmon produce a harvestable surplus and it is predicted upon a non-fluctuating environment. This model has not been successful in protecting native, locally adapted stocks especially small, less productive ones. It ignores ecological values such as stock fitness to cope successfully with a fluctuating environment, and natural selection and nutrient capital by stock and watershed. Saying MSY can be used to protect stocks and maintain biological functions is a critical uncertainty that must be evaluated and treated as an experiment. It is loaded with risk and must be treated as such. MSY is harvest friendly not conservation biology friendly.

132, 159, 320, 399, 471

Response: Many of these comments have been addressed in revisions to Chapters II and IV plus Appendices B, D, F, and G. All fish populations, including salmonids, have interannual variability (a fluctuating environment). A spawner-recruit relationship includes this factor and remains valid over time as long as the trend line for environmental variation remains flat.

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7 **Comment:** No discussion of WDFW institutional structure changes needed to implement the WSP.
a. Need specific staff expertise (genetics, T&E specialist, biometrician, habitat program director, staff to write WSP annual report on status of native, wild populations.
b. Need program structure and staff to implement the WSP internally as well as externally. The program director should report directly to the agency director.
c. The staff will in effect, be the ones responsible for ensuring the WSP is implemented by the agency and will be the home for conservation management in the agency. The dual mission of WDFW to provide harvest and conserve the resource then will have the organizational structure to do the job. The WSP must add a discussion of the institutional structure it will use to implement the policy.

132

Response: We have added critical implementation sections in Chapters II and IV. However, we see the WSP as a mandate for guiding the entire agency staff. Setting up a new special section might allow the remainder of the agency to "ignore" the WSP.

---

8 **Comment:** Need to address monitoring and evaluation in a separate appendix and incorporate in a discussion of monitoring and evaluation among the alternatives. The M&E program must address adaptive management and how the WSP proposes to use it to inform policy and management of salmonids.

132

Response: This is beyond the scope of what we tried to accomplish in this process.

---

9 **Comment:** The draft EIS mentioned the harvest problems with both the Tribes and British Columbia. What guarantee do we have that the sacrifices made in the state of Washington will be effective without formal agreements with these entities?

148, 159, 471

Response: We do not have any guarantee. However, the policy described is designed to be successful in spite of this problem.

---

10 **Comment:** The Policy should be totally upfront about the biological harm that is done to chinook salmon by allowing targeting and incidental fishing mortality on immatures. For decades, the majority of chinook salmon killed by fishing have been fish one, two or even three years from ultimate age, even though the scientific community has been almost unanimous that this is not right. It is an axiom of successful fish management not to target immatures - for salmon and all other species. The WDFW could make a giant step toward correcting this problem coastwide by stating in the Policy that targeted fisheries for immature chinook should be phased out, as well as the incidental capture of such fish. The mature-fish standard is a concept that is ready to catch on coastwide, if your agency took the bold action of adopting it in the Policy.

149, 159, 328

Response: We attempted to partially address these concerns by modification of the incidental catch standard in Alternative 3. Other management issues will eventually be addressed in the future species plan for chinook salmon.

---

11 **Comment:** Greater emphasis is needed in the Policy on off-site, pen-reared release of hatchery salmon, as an alternative technology for allowing selectively higher harvest rates. The Policy stresses mass marking, which is one useful approach, but almost to the exclusion of other technologies. Alaska uses off-site releases extensively to allow selectively higher hatchery harvest, and as the Policy preamble points out, Alaska salmon management is the acknowledged success story. In mixed-stock harvest areas of Alaska, fishing rates are set for the wild stocks; the hatchery surpluses are cropped in carefully controlled sport, troll and net terminal fisheries at the release sites. Your staff should review this successful Alaska program in detail to see what elements of it would apply to Washington.

149, 256

Response: We found this to be a very useful suggestion and have incorporated it into the revision of Chapter IV.

---

12 **Comment:** MSY does provide a conceptually simple goal for harvest management; however, an OSY (optimum sustained yield) is much preferred. OSY would allow more fish to spawn than at MSY, and should facilitate (1) a healthier metapopulation by providing more fish for natural (i.e., pre-1860's) levels of gene flow, (2) higher catch-per-unit-effort (which for sport fisheries should be more important than total kill), (3) less inter-annual variability in run size (the spawner-recruit relation is steepest below MSY), (4) more carcasses to sustain productivity of the aquatic ecosystem, and (5) other benefits mentioned in the policy itself.

In fact, Alternative 3 appears to recommend some sort of OSY, primarily focusing on inaccuracies in achieving MSY escapements. The other aspects of OSY (partially listed above) also should be included in these considerations. If not applied to all streams, then OSY at least should dictate management of specific populations such as those primarily originating in Olympic National Park where the health of the greater ecosystem is a high priority for society.

159, 169, 320, 399, 471

Response: We believe that the revised spawning escapement policy in Alternative 3 closely parallels these comments. However, we did not want to originate a new acronym such as "OSY." It might be associated with optimum yield (OY) and its associated problems (see revised Chapter IV).

---

13 **Comment:** --Appendix D, page 2 contains an error under A. (Full Utilization of Habitat). Definition 2 apparently should be 'the replacement level of the population (with no harvest).' The definition given in the policy is the definition of MSY (point B in Fig. 2), not for replacement — for every escapement greater than the MSY escapement, addition of one more spawner will produce less than one full recruit, otherwise the yield from this higher escapement would be greater than the yield at MSY.

--Appendix E, top of page 4 tells me that "Details on how these factors interact with each other to determine the minimum spawner abundance are given in the Appendix D. I did not see that discussion in Appendix D. Either give the page number, or correct the statement.

159, 169, 471, 320, 471

Response: These and all similar errors have been corrected. (Note: additional errors of this type will not be presented in this section.)

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14 **Comment: Spawner Abundance** - I believe on setting spawning escapement goals strictly on science and that our management approach needs to be more conservative than it has been in the recent past. However, not in the way that it is described within the document or at the public workshops. A given stock's spawning escapement goal should be based on our best estimate of its Maximum Sustainable Yield given its associated biological parameters. The data series drawn upon to make this estimate should include the most recent years for which there is a complete data set, and be large enough to

cover the spectrum of ocean and freshwater production values experienced in the recent past (i.e., both high and low ocean productivity and flood and drought years). This estimate should be reviewed every five to ten years to reassess the validity of the basic underlining assumptions (e.g., available habitat) and to confirm that the current trends in the biological parameters are within the range of values covered by the original data series.

256, 399

Response: We are in general agreement with these comments.

---

15 **Comment:** The Department proposes to set the spawning levels based on science, but immediately suggests to add, not one, but two subjective buffers. The justification for this proposal is vague. It seems the author is confusing a stock's biological threshold with its Maximum Sustainable Yield (MSY) estimate. I find this overwhelming concern about not achieving this production goal odd, when the Department is strongly advocating to de-emphasize harvest and make it a secondary consideration. Why then, is the Department insisting on adding these buffers to assure meeting MSY, or in other words, optimizing the harvestable surplus for each stock when the primary goal is no longer to harvest these same stocks?

256, 399

Response: We have attempted to better describe our proposed spawning escapement policy in a revised version of Alternative 3. See Chapter II. Additional relevant narrative has been added in revisions of Chapter IV and Appendix G.

---

16 **Comment:** I strongly oppose the simplistic approach of the elimination of all hatchery management zones. The proposal now to switch back to "wild stock" management in the Lower Columbia, Willapa Bay, and South Puget Sound is akin to closing the barn door after the cows got out. Native stocks in these areas for all practical purposes are functionally extinct, as this document notes for Lower Columbia coho on page three. The pursuit of this policy now in these areas is essentially saying the Department wants to curtail its hatchery production and lower harvest rates in order to protect hatchery strays. I fail to see the logic or benefit in such a proposal.

256

Response: A new section has been added to describe how the policy would be implemented with respect to hatchery fish management zones (see revision of Chapter IV).

---

17 **Comment:** The Department's ideas on selective fisheries and mass marking need further work and the public needs to receive more details how they are going to be applied and what actual benefits can we expect. Without this analysis, the public is being asked to take it on faith that this is the right thing to do. I for one am unwilling to write such a blank check. The stated goals used at different times to justify this proposal seem to conflict with one another: protecting wild stocks and increasing fishing opportunity.

256

Response: A new section has been added to describe how the policy would be implemented with respect to selective fisheries (see revision of Chapter IV).

---

18 **Comment:** The use of steelhead as an example to justify this proposal is confusing. For all the years mass marking and selective fisheries have been conducted within the Columbia River, it has yet to abate or stop the decline of the native runs within the river system. If the Department is going to make this proposal credible, it will have to provided more specific details on how this approach will be structured differently for salmon, in order to achieve the success that has alluded steelhead.

256

Response: The problem with steelhead in the upper Columbia River is that the wild steelhead populations are not currently capable of replacing themselves (see revised Chapter IV). The lower Columbia River problem is primarily interactions with hatchery fish, not abundance of wild steelhead per se. Still, the proposed steelhead listing as "threatened" is two entire status categories above the "extinct" conclusion for coho salmon (the intermediate level being "endangered").

---

19 **Comment:** There still appear to be some shortcomings to the proposed Policy. While the document discusses the essential component of sustainability, no appropriate means of defining or measuring that component of the Policy has been identified. Foresters discuss the concept of sustainable forestry practices in terms of periods of time which generally are no shorter than 500 years. A sustainable fisheries management cycle could be shorter in duration, given the shorter growth cycles of fish relative to forests, but one could make a good argument that "sustainability", in light of the proliferation of unnatural limiting factors affecting fish, should probably be measured at no less than 50 years, and 100 years being a safer bet, with appropriate milestones identified in the interim. A requirement for the inclusion of adaptive management strategies, to identify and address observed deviations from the goal of sustainability along the established timelines would appear essential.

302

Response: In the revised version of Alternative 3, we have rated sustainability as high for both Alternatives 2 and 3. This should be considered in light of new information presented in the revised Appendix D. The problems with quantification of expected results are discussed in the revised Chapter IV.

---

20 **Comment:** The Policy inadequately discusses the harvest management concepts of primary and secondary management importance and how these are applied. As we understand, primary management stocks may be hatchery or wild and are managed for specific escapements. Secondary management units are those fish stocks that receive no specific management protection and so escapement is not ensured. While this may be a reasonable management dichotomy, it may not be applied uniformly or reasonably.

320

Response: We have clarified this distinction in revisions to Chapters II and IV.

---

21 **Comment:** The statement that MSY "...has a worldwide track record of sustainable success when applied correctly" (emphasis in original) should be upheld with specific scientific documentation. In addition, the statement implies that MSY has not been applied correctly in Washington. The reasons why MSY has not been applied correctly and how WDFW intends to overcome these problems should also be provided before the public can gain confidence that the harvest management goals in Alternative 3 can be met.

320, 399, 471

Response: We have provided documentation and clarification in revisions to Chapters II and IV plus Appendices B, D, and G.

---

22 **Comment:** The Policy briefly mentions two buffers to account for risk to the resource due to uncertainty with respect to spawner-recruit relationships and harvest management precision. We concur with the concept of a buffer to account for environmental variability, insufficient data, and management error. However, additional detail is required to adequately describe computation of the buffer. Will it be a constant percent of the calculated MSY level or will it vary between watersheds? Will it vary depending on trends in survival? If it varies, what factors will be used in its computation? Who will make these decisions?

320, 399

Response: We have provided examples of how this might be done in the revised Appendix G.

---

23 **Comment:** We support the mass marking of hatchery fish. This will provide an invaluable source of information in the development of sound management strategies. However, it is crucial that mass marking be used as a management tool, and not as a rationale for increased fishery or recreational allocations. This is a danger that should be anticipated and carefully avoided in the WSP. Mass marking must not justify an increased encounter rate with wild fish. Instead, it should provide information to better manage for selectivity which occurs in the water through gear, time and area restrictions. The survival of wild salmonids must be given the highest priority when making fishery management decisions, but it is crucial that these decisions are made on the basis of sound science, not political pressures. Where the data are lacking, the department should err on the side of conservation of wild stocks.

328

Response: We agree with these comments. The general concepts have been incorporated into the revised Chapter IV.

---

24 **Comments:** Alternative 5. **Spawner Abundance**. States that "Some individual stocks would be maintained slightly above the level of immediate risk of permanent harm." With the present condition of many salmon stocks in Washington, it would not be acceptable to put these stocks at even more risk.

359

Response: We agree with this comment. The information presented in revised Appendix D shows that the risk is even greater than portrayed in the DEIS.

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25 **Comment:** Monitoring and Evaluation. States that "Resource management goals, ...and actions will be evaluated to ensure the goals of the WSP and related species or geographic plans are met." How will these be monitored? When will a monitoring plan proposal be available for review and comment.

359

Response: The spawning escapement policy is the most critical element and a framework for monitoring is presented in Alternative 3. No time frame has been established for a more specific overall plan.

---

26 **Comment:** Application of Priority Criteria. States that "The following are several hypothetical examples to show how we might apply the recommended policies in Chapter 3..." There do not appear to be any policies in Chapter 3, only statements about expected impacts to the affected environment.

359

Response: The original Appendix A from the DEIS has been deleted.

---

27 **Comment:** How does the existing State document and program "Washington State Aquatic Diversity Areas," fit into the WSP? There is no reference to this document in this first draft of the WSP. It would seem that the two programs need to be carefully intertwined.

359

Response: There is no connection at this time between the two efforts. The problem is that the diversity area approach never reached a state of completion and no one in WDFW has worked on it for several years.

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28 **Comment:** What about the interception of Washington State salmon and steelhead produced fish in the Alaskan and Canadian fisheries, especially the Alaskan fishery? Isn't this a significant enough harvest issue and concern to be addressed by the WSP?

359, 471

Response: We have added these concerns in our revision of the document.

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29 **Comment:** Internal WDFW staff must be held accountable for their reluctance to try new programs. We recently were denied chinook eggs for the Willapa River (although we asked for a paltry 50,000 for an RSI) because the new eggs "could cloud the issue of ESA". One WDFW staff member blocked a potentially beneficial and certainly minimally damaging project.

384

Response: The main reason for any policy is to achieve a consistency in responses from all agency staff members. The public has a right to expect this from professional natural resource managers.

---

30 **Comment:** We concur that "buffers" or other risk avoidance features should complement the Maximum Sustained Yield concept to ensure enhanced protection of the resource. MSY has always been and will always be difficult to establish with precision. Accordingly, the concept should be used in a precautionary way. We note the application of MSY may be more readily achievable with respect to steelhead. In the case of salmon, some flexibility may be needed to avoid complete curtailment of all fisheries.

399

Response: Flexibility has been provided in several revisions to Alternative 3. These are analyzed in the revised Chapter IV.

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31 **Comment:** Selection of a final alternative in the Wild Salmonid Policy will lead to adverse impacts on harvest levels and fish-dependent communities, at least in the short-term. The EIS should make a better effort to identify and assess these impacts--and provide their amelioration if possible--as that is an important feature of well-prepared environmental assessments.

399

Response: We agree with this comment and have attempted to respond in the revisions of Chapter IV as well as in changes to Alternative 3.

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32 **Comment:** As a general rule, a 10% maximum incidental impact seems appropriate, but it may need to vary for some stocks. A case-by-case approach may be more workable. The EIS should be clear on how the measurement of incidental harvest will occur in a systematic way. In addition, this is one of the many issues on which further consultations with the Tribal co-managers need to occur.

399

Response: We agree with the comment and have addressed it (see revised Chapters II and IV).

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33 **Comment:** I believe it is of utmost importance to develop a commercial gear type capable of selectively harvesting hatchery-produced coho and chinook (and conversely and of ultimate importance, that can release wild fish of the same species). Now that we have moved forward reaching agreement on fish marking, we need such a gear type so we can take advantage of the potential benefits of marking. Washington treaty fishers have significant economic and cultural reasons to continue to commercially target coho and chinook. With minor exceptions, their gear type is gillnets. This gear type, properly used, is highly selective in catching nearly exclusively the targeted species by virtue of timing, area fished, and mesh size. However, within a species, when you have mixed hatchery and wild stocks, they are generally not selective. Given the cultural desire and economic necessity to continue to fish, utilizing existing small (gillnet) boats and to use nets, I would suggest there is a very logical solution. Development of a floating fish trap could fulfill all of the needs outlined herein; selectivity, workable by small boats, utilizing nets, and keeps hatcheries going to provide coho and chinook for sport and treaty commercial fishers. The American Fisheries Society suggested in their critique of the Wild Salmonid Policy Draft that river fish traps would serve such a purpose. The problem with river fish traps is that they don't conform to the small boats/nets scenario and they produce a poorer, less valuable water-marked fish.

469, 471

Response: We have incorporated this comment into the revised Chapter IV.

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34 **Comment:** We are concerned, however, that the main body of the DEIS (before the appendices) seems at once too pessimistic and too optimistic. It may be overly pessimistic in two regards. First, it seems to take the view that reductions in fishing, needed to allow wild populations to recover from excessive harvest rates associated with productive hatchery programs, will necessarily result in much lower overall catches. This is likely to be true in the short term, but some populations may now be well below optimal escapement levels and stocks whose populations could not stand the pressure of mixed hatchery/wild fisheries may recover quickly with a lessening in harvest rate. It may be possible to maintain a lower rate of fishing but perhaps not realize as great a reduction in catch as is implied. Salmonid populations are remarkably resilient, given a reasonable chance, and are capable of rapid recovery.

471

Response: We agree with this comment. The revised analysis in Chapter IV reflects a more optimistic expectation than was reflected in the DEIS.

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35 **Comment:** The second reason the DEIS may be overly pessimistic is that marine survival rates of many anadromous salmonid populations in the Pacific Northwest have been quite low lately. The reasons are not entirely clear but ocean conditions are strongly implicated in most scenarios (see several papers in Stouder et al. 1997). If the past century is any guide, trends in climate and ocean conditions that were more favorable to salmonids in our region are likely to eventually return and marine survival should climb accordingly. There is no guarantee that this improvement will take place in the near term and we should not count on the ocean to bail us out of habitat-related problems. But what seem like trivial deviations from long-term average ocean temperatures, salinities and other conditions are often correlated with up to 10-fold changes in marine survival. We are not sure precisely how to work this idea into the report but think a growing number of scientists agree that the ocean has been exerting a powerful effect on salmonid abundance, and this should be acknowledged

in the DEIS.

471

Response: We agree with this comment. Data on marine survival rates have been incorporated into a revised and expanded Appendix B. In addition, the relationships between marine survival and harvest management have been addressed in a revision of Appendix G.

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36 **Comment:** The DEIS does a good job of identifying the major factors controlling salmon populations in the state (i.e., habitat, harvest management, spawner abundance, ecological interactions, hatchery operations). However, the thoroughness with which each of these topics is covered is very uneven. For example, the habitat element (Appendix C) extends nearly 40 pages. None of the other issues is afforded even 10 pages. The habitat component of the alternatives also is much longer and more specific than the treatment given other issues. Very specific performance criteria are proposed for habitat conditions but none are provided for harvest, hatchery operations or spawner abundance. There is no technical rationale for the discrepancy in the attention given these various factors. The recent report by the National Research Council (1996) clearly indicates that all these factors are critically important to restoring healthy salmon stocks. The non-habitat components of the plan should be more thoroughly discussed and specific, quantifiable objectives and actions steps to achieve these objectives should be associated with each component.

471

Response: The fish population management elements have some very specific performance criteria (as opposed to the claim of "none" above). Other reviewers have complained that these standards are too rigid and inflexible as opposed to the habitat standards. The habitat management elements still take more pages to present and discuss but this should not imply that they are inherently more important.

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37 **Comment:** Much of the DEIS is poorly referenced. In many cases fairly controversial points are made without any supporting citation (e.g., Appendix C includes some discussion of seasonal mortality rates with no reference as to the source of this information). Given the importance of this document, care should be taken to ensure that the statements made in the plan are supported by the most up-to-date technical literature.

471

Response: The document has been carefully edited and/or re-written to address this comment. New published references have been added and a number of personal communication citations have been deleted. In some cases, statements were removed if the technical justification was weak.

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38 **Comments:** A section should be included which discusses the relationship between various components of the plan. Only the brief Ecological Interactions section makes the attempt to put the various factors affecting wild salmonids into a broader context. The effect of the harvest or hatchery components on habitat, the impact of habitat quality on harvest, etc., are all important pieces of a comprehensive management strategy but are not addressed in the current document. One part of the discussion should address the timing of the expected response by stocks to implementation of the

various plan elements. Clearly, the plan elements operate at very different temporal scales. Altering escapement goals or harvest rates will have an immediate effect on numbers of fish returning to spawn. Since recovery of degraded habitat is a long-term proposition, implementation of habitat restoration and protection measures could not be expected to have beneficial effects until some time in the future. The temporal segregation in the effects these measures will have on naturally spawning populations emphasizes the need to address all the plan components simultaneously, rather than focusing on individual factors separately.

471

Response: We have expanded Appendices B, D, F, and G to respond to this comment, particularly with respect to the relationships between actual fish populations and fish habitat parameters. We agree with the projected long-term trends provided by the National Research Council (1996) and have included this information in the revised Chapter IV. The problems associated with making quantitative projections of future salmonid populations are also discussed.

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39 **Comment:** To a considerable extent the depressed condition of chinook and coho stocks in Washington can be blamed on high fishing pressure in waters adjacent to British Columbia. This fishing pressure has resulted from an explicit and conscious trade-off of chinook and coho for Fraser River sockeye. The health of Washington's wild chinook and coho could be greatly improved by renegotiating the Pacific salmon treaty and seeking a dramatic reduction in Canadian fishing on chinook and coho in exchange for an abandonment of the U.S. claim to Canadian sockeye. Such a change in policy would be in accordance with the Law of the Sea, which recognizes that salmon belong to the country where they spawn. Given that both the U.S. and Canada are signatories to the Law of the Sea, such a settlement seems quite sensible, and we encourage the DEIS to address this problem.

471

Response: The actual situation is much more complex than this comment indicates. For example, the state of Alaska and all five species of Pacific salmon are involved. Solution of this dilemma was beyond the scope of our current effort.

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40 **Comment:** As one moves from alternative #2 to alternative #5, we go from a highly protective policy to a policy that maximizes fishing opportunity. We did not find any discussion in the report of the central argument for tending towards alternative #2 or #3, namely that there is reason for considerable concern that maximizing short-term fishing opportunity by accepting lower wild spawning stocks and higher hatchery production may threaten the long term viability of the resource as a whole. We are worried that the general public, particularly the commercial, tribal and recreational fishermen, will fail to see that there is any benefit to alternative #3, and instead see this alternative as benefitting only the non-consumptive users. Perhaps a better explanation of why WDFW wants to maintain the "wildness" of the salmonids and the concerns about the long-term sustainability of hatchery production should be included.

471

Response: We agree with this comment. In revising Chapter IV, we attempted to make a more accurate and complete assessment of each alternative. In addition, we feel that substantiative changes

to the original version of Alternative 3 have largely reduced or eliminated any potential adverse impacts.

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41 **Comment:** The discussion in the DEIS contains some controversial, and in some cases, misleading statements about the use of maximum sustained yield (MSY) to manage harvest and escapement. For example, Alternative 3 includes the statement The actual work for salmon and steelhead will be firmly anchored in the proven scientific concept of MSY, which has a worldwide track record of sustainable success when applied correctly. We are not aware of any compelling examples of the success of MSY applied to Pacific salmon and steelhead populations. In fact, many of the assumptions underlying MSY are not applicable to these species. Environmental conditions vary interannually in both the freshwater and marine environment. In addition, the basic data needed to construct the spawner-recruit relationship tend to be difficult to obtain and often inaccurate, as indicated in Appendix D. It is misleading to claim that MSY is the appropriate tool to establish escapement goals without thoroughly addressing some of the fundamental theoretical and logistical problems associated with the application of this technique to populations of anadromous salmonids.

471

Response: We do not agree that certain statements are "misleading." The key works in the above comment are "We are not aware." However, we have provided considerable additional technical support in revising Alternative 3, Chapter IV and Appendices B, D, F, and G.

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42 **Comment:** There are some inaccuracies in the discussion of ecological interactions as they apply to spawner abundance as well. Alternative 3 states that spawner-recruit curves account for the productivity benefits associated with the nutrients and organic matter contributed to freshwater habitats by spawning salmon. Species and stocks which spend at least a year in freshwater accrue benefits from nutrients contributed by their parents as well as adults spawning the following year. Only the parents are represented in the spawner-recruit relationship. In addition, there is ample evidence that spawning by one species can benefit all species residing in the reach where spawning occurs. Resident trout use nutrients and organic matter provided by spawning pink salmon (Kline et al. 1990), steelhead and cutthroat derive benefits from spawning coho salmon (Bilby et al. 1996) and coho smolt production in the Skagit River is positively correlated with pink salmon escapement (Michael 1995). These interspecific interactions are not expressed by the spawner recruit relationship.

471

Response: There were no inaccuracies in the original statements but we have re-written them to state the same points in a clear, unambiguous manner.

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43 **Comment:** The failure of MSY to reflect some of these important ecological interdependencies, account for the interannual variability in freshwater and marine environments, and the difficulty in obtaining accurate data suggests that other methods of establishing escapement goals should be seriously considered in the DEIS. The treatment given to other methods of setting escapement goals in Appendix D is very superficial and restricted to a comparison of the ways in which a spawner-recruit curve can be interpreted. Use of historical records of spawner abundance or habitat availability to set escapement goals should be evaluated. In addition, some discussion of how these

methods could be modified to account for the contribution made by spawning salmon to the productivity of freshwater habitats should be included.

471

Response: This comment is based on some erroneous conclusions. However, we have revised several sections to better explain key points. For example, Appendix G has been revised to describe why we want to move away from setting escapement goals based on historical records or habitat availability.

---

44 **Comment**: Supported the management of wild and hatchery fish as "separate species."

8, 12, 13, 19, 20, 31, 33, 46, 48, 49, 54, 55, 58, 62, 68, 71, 73, 77, 80, 81, 83, 87, 88, 89, 90, 91, 93, 94, 98, 99, 100, 104, 106, 108, 109, 111, 112, 114, 116, 117, 118, 120, 123, 129, 162, 163, 164, 165, 166, 178, 179, 180, 183, 184, 185, 186, 187, 189, 190, 193, 194, 196, 197, 199, 200, 202, 203, 204, 205, 206, 207, 209, 212, 215, 216, 222, 223, 228, 248, 251, 257, 259, 298, 305, 308, 310, 326, 339, 349, 351, 404, 413.

Response: We agree with this comment. The intent to do this is embodied in the revised Alternative 3.

---

45 **Comment**: Did not support separate management of hatchery and wild fish.

11, 17, 28, 32, 36, 39, 47, 53, 82, 92, 97, 119, 212, 134, 182, 191, 192, 195, 198, 201, 208, 210, 211, 213, 224, 226, 245, 247, 266, 307, 406, 416.

Response: We believe that managing hatchery and wild stocks together has been a major factor in the present status of wild and hatchery stocks and present lack of fisheries.

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46 **Comment**: Supported the detailed program analysis of each hatchery program.

8, 11, 13, 15, 19, 20, 31, 32, 33, 36, 45, 47, 48, 49, 53, 54, 55, 58, 61, 62, 68, 73, 80, 87, 89, 91, 93, 94, 98, 99, 100, 102, 104, 106, 108, 109, 111, 112, 114, 116, 117, 118, 119, 120, 129, 156, 162, 163, 164, 165, 166, 170, 179, 181, 182, 183, 184, 186, 189, 190, 193, 194, 195, 197, 199, 200, 202, 203, 204, 205, 206, 208, 209, 210, 211, 212, 213, 215, 216, 222, 223, 226, 228, 245, 248, 251, 257, 259, 266, 298, 305, 307, 308, 310, 326, 339, 349, 351, 363, 404.

Response: We believe that this is necessary to improve hatchery operations consistent with the WSP.

---

47 **Comment**: Did not support the detailed program analysis of each hatchery program.

17, 39, 82, 88, 90, 121, 178, 180, 185, 187, 191, 192, 201, 224.

Response: We do not agree with this comment.

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48 **Comment**: Supported the continue rearing of exotic species.

19, 32, 119, 121, 191, 195, 199, 259, 310.

Response: Comment noted.

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49 **Comment**: Supported the limited rearing of exotic species if it did not negatively impact wild/native fish.

55, 62, 80, 91, 100, 106, 109, 179, 182, 202, 203, 207, 215, 228, 266, 305, 326, 404.

Response: Comment noted.

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50 **Comment**: Did not support the continue rearing of exotic species.

8, 11, 13, 17, 20, 28, 31, 33, 36, 39, 48, 53, 54, 58, 61, 68, 73, 82, 83, 87, 88, 89, 90, 93, 94, 98, 99, 104, 111, 112, 114, 116, 117, 120, 129, 162, 163, 165, 166, 170, 178, 180, 185, 186, 187, 188, 189, 190, 192, 193, 194, 196, 197, 200, 201, 204, 205, 208, 209, 210, 211, 213, 223, 245, 247, 248, 251, 257, 298, 307, 308, 320, 339, 349, 363, 413, 416, 471

Response: Comment noted.

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51 **Comment**: Did not support the continue rearing of exotic species with exceptions.

92-not by government, ok if compatible with local species; 102-brown trout ok; 181- some isolated cases ok; 184-brook trout ok if controlled/isolated; 351-no if impacts wild/native species.

Response: Comment noted.

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52 **Comment**: Believed that the focus on "wild species" would mean the loss of hatchery programs.

8, 11, 19, 28, 32, 33, 36, 48, 53, 54, 55, 62, 66, 82, 87, 89, 90, 91, 92, 93, 97, 98, 106, 108, 109, 111, 112, 116, 117, 121, 129, 163, 166, 179, 180, 181, 183, 184, 185, 190, 192, 193, 197, 198, 200, 203, 204, 205, 206, 209, 210, 211, 212, 215, 216, 222, 226, 228, 245, 246, 247, 248, 251, 257, 259, 266, 307, 310, 326, 329, 339, 349, 351, 401, 419.

Response: This was not the intention of Alternative 3. Revisions to Alternative 3 were made to make this point clearer.

---

53 **Comment**: Believed that the focus on "wild species" would not mean the loss of hatchery programs.

12, 13, 17, 20, 31, 46, 61, 68, 73, 80, 88, 99, 102, 104, 114, 119, 123, 164, 165, 170, 178, 186, 191, 195, 201, 202, 208, 223, 305, 308, 363, 404, 413.

Response: This is the intent of revised Alternative 3.

---

54 **Comment**: Is the goal of the genetic interaction section to meet standards or the intent?

59

Response: The amount of gene flow is the criterion that is defined. In the absence of a specific study to measure this, these would serve as measures of the percentage of strays in wild spawning populations.

---

55 **Comment**: There must be a way to create a more diverse gene pool in hatchery stocks.

61

Response: One way is to bring in wild broodstock to the hatchery.

---

56 **Comment**: Hatcheries should maintain genetic diversity rather than biomass.

63

Response: This is one of the hatchery functions that will increase under revised Alternative 3. See revised Appendix H.

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57 **Comment**: Stock-by-stock management which maintains the biological diversity, evolutionary potential and genetic variation of small, less productive populations should be the bellwether of the WSP.

132

Response: This is a goal of revised Alternative 3.

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58 **Comment**: The effective breeding population is about 1/4 of the census population.

132

Response: The range of values in the literature is from ½ to 1/10.

---

59 **Comment**: WSP must state whether the 500 number is Nb or N.

132, 471

Response: The 500 number is Nb.

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60 **Comment**: A definition of supplementation (RASP) should be stated in the policy alternatives.

132

Response: Comment noted.

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61 **Comment**: Gene conservation protocols for cultured production and monitoring plan are not mentioned in WSP.

132

Response: Hatcheries operate under specific breeding guidelines (Seidel 1983) and interactions with wild stocks are detailed in revised Chapters II and IV, and revised Appendices A, E, and H of the FEIS.

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62 **Comment**: Low similarity and high similarity to hatchery stocks must be defined by specific criteria.

132

Response: See revised Appendix E.

---

63 **Comment**: WSP ignores the fact that hatchery fish diverge from their wild source stocks through domestication selection.

132

Response: The amounts of domestication of hatchery fish compared to wild fish are reflected in the level of similarity which is used to determine the allowable amounts of gene flow.

---

64 **Comment**: How different is the loss of diversity within a population measured compared to one that has not lost diversity?

159

Response: Life-history variation can be used as well as loss of alleles, a decrease in the number of loci that have genetic variation, and average heterozygosity. Also refer to Ryman and Utter (1987).

---

65 **Comment**: This study (Kalama River steelhead) shows that the first generation productivity may be significantly reduced, but it does not show how future generations are effected. Crosses may be superior to wild fish.

159, 333

Response: This study was not designed to answer that question . Also, too few fish survived the first generation to do the study. A loss of diversity within a population generally reduces fitness except in outbred populations where local adaptation would reduce diversity. It is a balance in each population.

---

66 **Comment**: Gene flow is both advantageous and deleterious from hatchery to wild and I do not believe hatcheries are to blame for demise of wild fish. The advantages of hatcheries greatly outweigh the advantages of restricting gene migration.

159

Response: Comment noted.

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67 **Comment**: What proof do you have to offer that there are truly genetically wild fish, if so where are they? Wild fish no longer exist, are a myth.

137, 243

Response: For over 25 years researchers (State, Federal, Tribal, and University) have been examining the genetics of Washington salmonids. In the majority of cases throughout Washington, naturally spawning populations are significantly different from hatchery strains and they maintain hierarchical genetic patterns consistent with the existence of native fish runs.

---

68 **Comment**: There is no strategy in the draft EIS to address the interbreeding and competition from species which have historically been introduced since the 1930's, specifically eastern brook trout and rainbow trout.

148

Response: See revised Chapters II and IV and revised Appendix F.

---

69 **Comment**: WSP mentions in several places that genetic diversity <u>within populations</u> is to be maintained or increased. A goal of increasing genetic diversity can be accomplished by introducing fish (hatchery or wild)) from other stocks, yet this seldom if ever would be consistent with conservation. WDFW's goal should be TO MAINTAIN OR INCREASE GENETIC ADAPTEDNESS.

169

Response: One of the intents of the WSP is to increase within stock diversity where it has been decreased by creating conditions for natural patterns of gene flow to occur.

---

70 **Comment**: Allow higher levels of cross breeding needed to continue hatchery programs. Even the highest number of 50% is not achieved in many rivers. Determine allowable levels of crossbreeding

with hatcheries using local wild stocks. There is NO evidence that any of our wild fish declines are caused by hatchery-wild interaction. Allowable gene flow can be increased without risking wild stocks

233, 289

Response: The gene flow criteria were established to allow local adaptation to be the primary force shaping the wild population. The WSP stresses that efforts should be taken to control levels of crossbreeding above the indicated levels, but reducing hatchery programs is only one strategy. Refer to revised Appendix E for further discussion. Also refer to revised Alternative 3. Note that a 5% level of allowable strays in the wild population means that 10% of the production would be crossbred if spawning is random because each stray would spawn with a wild fish.

---

71 **Comment**: Minimum stock size of 2000 fish is unreasonable for many steelhead stocks.

233, 340, 362, 399

Response: Revised Alternative 3 recommends a minimum stock size of 3000 fish divided by the average age of the adults to control genetic drift and lessen extinction risk. For many steelhead stocks this would be 750 fish per year. For historically small populations that were functioning as a metapopulation this would apply to the smallest localized aggregation of similar stocks. The WSP should direct increases in wild fish abundance through habitat and harvest efforts otherwise.

---

72 **Comment**: After 50 years of heavy hatchery planting of steelhead in Western Washington rivers, these rivers still have healthy runs. No significant genetic drift has occurred in most rivers (see attached summary of 1997 genetics report).

233, 255, 333, 340, 362

Response: The referenced preliminary study found that genetic distances between hatchery and wild populations had not become smaller as would be expected if there had been gene flow into the wild gene pool in many populations. There are several possibilities for this finding including the poor reproductive success of hatchery fish due to spawn timing and poor survival of hatchery and crossbred fish.

---

73 **Comment**: Amend option 4 fishery selectivity to add: When a significant alteration of size or run timing or age-at-maturity has taken place,steps should be taken to reverse this trend in both hatchery and wild.

233, 362

Response: The WSP revised Alternative 3 takes a more proactive approach to genetic selection of life history characteristics.

---

74 **Comment**: What is a wild salmon and how does this definition differ from NMFS or others regarding ESA.

241, 280, 275, 301a, 325, 349, 376

Response: This WSP uses the term wild fish and wild stock, which are fish that are born in the wild and a stock of fish that is sustained by natural spawning and rearing in the natural habitat, regardless of parentage (i.e., their parents could have been from that wild stock, been from a hatchery fish which spawned successfully in the wild, or been from another stock). We chose these criteria because we can or have the ability to clearly tell whether or not a fish was produced from a hatchery by a variety of methods (extrinsic marks such as tags and fin removals, scale and otolith patterns, and genetic marks). Determining the number of generations any particular fish has had parents that have spawned in the wild is virtually impossible. Thus, native fish with no interbreeding with fish raised in a hatchery and fish from one or both parents that were raised in a hatchery or from parents that migrated into this stock from another are all classified as a wild salmon because, when they spawn, they will have completed their life cycle in the wild.

This is the same definition that NMFS uses to describe a "natural" fish (Waples 1991). NMFS policy (Hard et al. 1992, NMFS 1993) stipulates that in determining (1) whether a population is distinct for purposes of the ESA, and (2) whether an ESA species is threatened or endangered, attention should focus on "natural" fish, which are defined as the offspring of naturally spawning fish. This approach directs attention to fish that spend their entire life cycle in natural habitat and is consistent with the mandate of the ESA to conserve threatened and endangered species in their native ecosystems. Thus, our use of wild in this EIS and the use of natural by NMFS is the same.

Part of the confusion of using the term wild is that some felt that under this definition a wild stock could be comprised of many or all hatchery strays. This situation is restricted by the gene flow element and would only occur when the hatchery is intended to produce valid spawners meant to breed with wild fish such as in a designed supplementation and rebuilding program (also see what counts section).

---

75 **Comment**: Reductions in hatchery releases are not warranted by data. Each watershed should be evaluated on its own merits.

282

Response: Your next point (5), "Obviously, we should do what we can to reduce hatchery fish spawning with wild fish." is how the WSP is intended to guide management on this issue. You captured many good suggestions; i.e., marking hatchery fish, greater harvest, and better imprinting & release locations (net pens). The effort to capture fish not intended to spawn that escape fisheries has been minimal.

---

76 **Comment**: Sustainability of fish populations not discussed.

302

Response: This is an area of research on extinction risk that we chose to deal with by adding a multiplier to the effective population size to get the minimum spawner abundance value of 3000 divided by the generation time.

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77 **Comment**: Homogenized habitat through numerical standards could reduce genetic variability amongst wild salmonid stocks.

319

Response: Refer to discussion on disturbance-based ecosystems in Habitat Comment Summaries. Also see revised Chapter V.

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78 **Comment**: Reisenbichler and Phelps (1985, 1989) indicated that there had been substantial interbreeding between non-native hatchery steelhead and wild populations on the Olympic Peninsula.

320

Response: Results of the referred study are overstated. The genetic patterns found in this study "...may be the consequence of gene flow from hatchery stocks...".

---

79 **Comment**: A phase out of the early-timed winter steelhead broodstock from WDFW hatcheries is long overdue.

320

Response: This management action discussion is too specific for the EIS.

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80 **Comment**: There are no clear standards, criteria, or protocols listed when discussing the use of hatchery fish to increase wild fish populations or for genetic supplementation.

320, 325

Response: The revised EIS Alternative 3 states that supplementation may be appropriate to rebuild locally adapted stocks when extinction is likely. However, specific supplementation strategies will be determined on a case-by-case basis.

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81 **Commen**t: Include a summary of the literature on the adverse impacts of cultured fish.

320

Response: Outside the scope of this EIS. Refer to recent books that include this subject such as National Research Council (1996).

---

82 **Comment**: Will the Department support ESA listing of "species" if WSP is not successful?

Response: Policy decisions made on a case-by-case basis are outside the scope of this EIS.

---

83 **Comment**: Use a river-by-river/watershed assessment of genetic impacts instead of numerical criteria because these may preclude hatchery production in most river systems, even those using local broodstocks.

392, 399

Response: The numerical criteria were developed to create the conditions for local adaptation (resulting in greater productivity and sustainability) of wild stocks to occur. While most everyone wants this for wild stocks, the criteria for achieving it are questioned because of perceived impacts on hatcheries and harvest. We believe the numerical criteria are necessary and workable when applied with the other elements of fish population management. Further river-by-river assessments would be useful to achieve the goals of the WSP.

---

84 **Comment**: The EIS applies a different Fishery Selectivity standard for salmonids other than Pacific salmon and the rationale for that proposal should be clear.

399

Response: We thought that the criteria for fish that can reproduce more that once were more appropriate and measurable.

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85 **Comment**: Lumping of bull trout and Dolly Varden as a single taxon is not appropriate.

471

Response: We agree that these are separate species and are listed as such in Table I-1.

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86 **Comment**: The policy on extending the range of salmonids was unclear.

471

Response: These are to be considered on a case-by-case basis because of the potential impacts on other native species.

---

87 **Comment**: Natural colonization should be considered for newly rehabilitated habitats.

471

Response: Comment noted.

---

88 **Comment**: Use specific criteria such as a genetic distance measures or amount of gene diversity difference for allowable gene flow values.

Response: We considered such an approach but the variance and inaccuracy of such measures were too great. Also, we decided that the differences in genetic diversity patterns among salmonid species precluded using uniform criteria for the mentioned measures. See further discussion in revised Appendix E.

---

89 **Comment**: Reconsider plan to regularly infuse wild fish into a locally-derived hatchery population.

Response: This option is emphasized more by revised Alternative 3.

---

90 **Comment**: Phase out hatcheries and concentrate on habitat improvement and protection.

7, 111, 112, 183, 349

Response: The loss of all hatchery production will greatly impact the opportunity to harvest fish.

---

91 **Comment**: WSP means serious reductions in hatchery production and harvest. No hatchery fish means no fishing!

11, 78, 89

Response: The loss of fishing opportunity is not the intent of the WSP. Through the use of selective fisheries, which work the best when the ratio of hatchery to wild fish is high, and increased natural production, fishers should benefit from this policy.

---

92 **Comment**: Use hatcheries to rebuild wild stocks, but keep raising hatchery fish as well.

13, 19, 114, 159, 180, 181, 207, 216, 233, 386, 390, 399, 415, 416

Response: This is one of the recommended uses for hatcheries under revised Alternative 3.

---

93 **Comment**: Hatcheries are beneficial.

15, 17, 19, 31, 32, 40, 46, 50, 53, 68, 87, 91, 92, 97, 108, 123, 179, 201, 209, 226, 228, 247, 256, 258, 273, 289, 333, 351, 370, 370, 380; when used properly 164, 223.

Response: Comment noted.

---

94 **Comment**: Hatcheries need to be closely monitored and evaluated.

45, 282, 298, 319, 350

Response: See revised Chapter II.

---

95 **Comment**: Wild stocks must take priority over hatchery production.

56, 324

Response: Comment noted.

---

96 **Comment**: Hatcheries should be self-supporting. Let the state sell surplus fish and put proceeds back to its own programs.

20, 58

Response: Such action would require changes in state law implemented through the legislature.

---

97 **Comment**: Upgrade our old hatcheries.

60, 114, 164, 208, 212

Response: To carry out new functions described in the WSP, some hatcheries will need to be upgraded (part of the program review).

---

98 **Comment**: How can you manage two kinds of the same fish "species" differently?

60

Response: This can be accomplished through mass marking all cultured production fish.

---

99 **Comment**: More NATURE's rearing for cultured production.

8, 62, 119, 267, 290, 362, 399

Response: "Nature's Rearing" is a relatively new concept in fish culture. The benefits and risks are to be assessed at several WDFW hatcheries.

---

100 **Comment**: Hatcheries should be part of an overall Fish Management Plan.

63, 98, 102

Response: They are currently.

---

101 **Comment**: Work toward making hatchery production more compatible with wild stocks.

8, 134

Response: One of the policy goals is to develop locally-adapted broodstocks and minimize ecological interactions.

---

102 **Comment**: Use locally adapted broodstocks for cultured production.

33, 61, 73, 94, 104, 106, 177, 182, 198, 213, 245, 248, 255, 308, 340, 351, 355, 362, 391, 471

Response: One of the policy goals is to develop locally-adapted broodstocks.

---

103 **Comment**: Use hatchery fish for harvest only.

48, 120, 143

Response: Hatchery fish will be targeted in fisheries more than wild fish under revised Alternative 3.

---

104 **Comment**: Hatcheries are necessary where habitat is limiting production.

54, 94, 116

Response: Comment noted.

---

105 **Comment**: Do resident fish (salmon) such as blackmouth eat wild smolts?

unknown

Response: The potential exists, yet field studies have not shown a high incidence of it occurring.

---

106 **Comment**: Address the use of electro fishing in the policy.

unknown

Response: Comment noted.

---

107 **Comment**: Hatcheries should be for research only.

83, 184

Response: Comment noted.

---

108 **Comment**: Hatcheries are a failure, they don't work any more.

93, 117, 190, 192, 200, 204, 215, 251, 280, 295, 339, 359, 375, 436

Response: Comment noted. See revised Chapter II and revised Appendix E.

---

109 **Comment**: Hatcheries are too costly.

99, 302, 324

Response: No cost/benefit studies have been done at this point, however, the hatcheries program review mentioned in the FEIS will consider it as an element of the process.

---

110 **Comment**: Fuller utilization of RSIs in stock recovery programs.

103, 144, 162, 177, 178

Response: RSI's may work well for some programs, but should be evaluated on a case-by-case basis.

---

111 **Comment**: Phase out hatcheries as wild stocks rebuild.

109, 165, 324

Response: Hatcheries will still be needed to mitigate for lost production from habitat lost to dam construction and heavy urbanization.

---

112 **Comment**: Use hatcheries only to rebuild wild stocks or supplementation programs.

129, 156, 161, 163, 166, 189, 197, 199, 267, 328

Response: If appropriate under the guidelines of supplementation as defined in the FEIS.

---

113 **Comment**: Close hatcheries that impact wild fish.

129

Response: Comment noted.

---

114 **Comment**: Question whether supplementation works.

175, 399

Response: The effectiveness of supplementation is currently being studied and evaluated with several species through cooperative studies with State, Federal, University, and Tribal scientists.

---

115 **Comment**: Reduce the number of hatcheries.

188, 244, 253, 257, 259, 299, 307

Response: Comment noted.

---

116 **Comment**: Increase fish passage at hatcheries.

192

Response: Comment noted.

---

117 **Comment**: Use smolt releases only.

193, 248

Response: See revised Appendix F.

---

118 **Comment**: Hatcheries cannot replace spawning and rearing habitat.

203

Response: Comment noted.

---

119 **Comment**: Stop selling eggs.

210, 212, 406

Response: There is a set of priorities for this action. After all current program needs, co-op needs, and tribal needs are met, eggs may be sold.

---

120 **Comment**: Return hatchery fish carcasses to the stream.

216

Response: Several pilot studies are evaluating this currently.

---

121 **Comment**: Restrict fish farming.

220, 241, 269, 277, 280, 328, 400

Response: Comment noted.

---

122 **Comment**: Need more pen-rear/release sites.

234

Response: Comment noted.

---

123 **Comment**: Hatchery fish straying is ok for colonization (i.e., Great Lakes example).

245

Response: This has only been found in areas where salmon were not native.

---

124 **Comment**: Where is the evidence that hatchery fish have impacted wild fish?

255

Response: See revised Appendices B, E, and F.

---

125 **Comment**: More quality and less quantity from hatcheries.

260

Response: Comment noted.

---

126 **Comment**: The NWPPC is now outplanting hatchery fish in the Yakima Basin which are NEVER to become "wild."

275

Response: The Yakima Basin supplementation hatchery is programmed and operated to return spring chinook to the river to eventually become wild reproducing fish.

---

127 **Comment**: How long will it take to recover wild fish?

308

Response: Recovery time will vary depending on the remaining population size and condition of the habitat. For stocks that primarily need increased escapement, recovery should be rapid as more spawners are passed onto the spawning grounds. For most at critically low levels with poor habitat, recovery could be measured in decades. See revised Chapter IV.

---

128 **Comment**: Hatchery strays have to be reduced, large impact on wild fish.

320, 362

Response: This is one of the intents of the WSP.

---

129 **Comment:** How will the policy affect other hatchery operations, i.e. tribal, federal, private?

359, 404

Response: Effects will be dealt with through co-management agreements.

---

130 **Comment**: Use hatcheries to improve strains of fish through genetic manipulations.

372

Response: Comment noted.

---

131 **Comment**: Harvest should be restricted so that more salmonids are allowed to spawn.

3, 11, 12, 13, 15, 17, 19, 20, 31, 33, 38, 39, 46, 47, 49, 55, 58, 61, 62, 63, 64, 68, 71, 73, 77, 80, 81, 82, 83, 86, 88, 89, 90, 91, 92, 93, 94, 97, 98, 99, 100, 101, 102, 103, 104, 106, 108, 109, 111, 112, 114, 116, 117, 118, 119, 120, 121, 123, 124, 129, 140, 156, 164, 165, 166, 170, 178, 179, 180, 181, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 202, 203, 204, 206, 207, 208, 209, 215, 216, 222, 223, 224, 226, 228, 244, 245, 246, 247, 248, 251, 253, 254, 256, 257, 258, 259, 266, 273, 293, 295, 298, 305, 307, 308, 310, 324, 326, 328, 333, 339, 340, 343, 349, 350, 351, 352, 354, 358, 363, 386, 396, 399, 400, 402, 406, 408, 410, 413, 416, 440, 445, 466, 469

Response: We agree with this comment. The intent to do this is embodied in the revised Alternative 3.

---

132 **Comment**: Harvest has already been restricted too much.

28, 32, 36, 54, 87, 201, 205, 210, 211, 212, 213, 266

Response: We do not agree with this comment. A team of fishery scientists formed by the Pacific Fishery Management Council concluded in 1978 that 40 percent more chinook and coho salmon were needed to meet spawning escapement requirements, under existing habitat conditions, for the combined areas of California, Oregon, and Washington. No one has claimed that we have improved on this deficit in recent years.

---

133 **Comment**: Mark hatchery fish so they can be distinguished from wild fish to allow separation.

3, 8, 12, 13, 15, 17, 19, 20, 32, 33, 39, 46, 48, 55, 61, 62, 64, 68, 71, 73, 77, 80, 82, 83, 86, 88, 89, 91, 93, 94, 97, 98, 99, 100, 101, 102, 103, 104, 106, 108, 109, 111, 112, 114, 116, 117, 118, 119, 120, 123, 129, 162, 163, 164, 165, 166, 170, 177, 178, 180, 81, 183, 184, 186, 187, 190, 191, 192, 193, 194, 196, 197, 198, 199, 200, 202, 203, 204, 206, 207, 209, 211, 213, 215, 216, 222, 223, 228, 233,

245, 247, 248, 257, 259, 266, 267, 282, 290, 298, 305, 308, 310, 315, 320, 324, 326, 328, 339, 340, 343, 350, 351, 354, 359, 362, 363, 373, 391, 392, 400, 402, 413, 420, 468, 469

Response: We agree with this comment. It is a mandatory requirement in revised Alternative 3.

---

134 **Comment**: Do not mark hatchery fish.

11, 25, 28, 36, 54, 87, 90, 92, 185, 189, 195, 201, 205, 210, 226, 307, 376, 395, 406, 416, 437

Response: We do not agree with this comment. Our rationale is described in revised Chapter IV.

---

135 **Comment**: Recommended alternative when one was primarily indicated.

Alternative 1: 157 (description indicated Alt. 2), 172,

Alternative 2: 10, 13, 19, 26, 45, 55, 56, 63, 71, 72, 73, 77, 89, 94, 98, 109, 115, 116, 117, 120, 129, 131, 139, 142, 146, 170, 171, 175, 180, 183, 184, 187, 189, 190, 192, 200, 202, 203, 204, 236, 238, 239, 242, 251, 253, 257, 264, 265, 268, 284, 288, 293, 295, 296, 300, 302, 303, 308, 309, 315, 317, 320, 321, 324, 326, 328, 330, 339, 344, 345, 348, 351, 353, 359, 362, 364, 374, 383, 384, 385, 387, 388, 397, 400, 410, 412, 418, 423, 438, 464, 468,

Alternative 3: 29, 43, 52, 56, 61, 62, 76, 77, 82, 83, 86, 93, 95, 97, 99, 100, 238, 247, 251, 259, 267, 268, 271, 274, 284, 286, 288, 290, 298, 300, 303, 305, 306, 310, 317, 333, 342, 350, 358, 362, 402, 404, 409, 411, 440, 446,

Alternative 4: 32, 97, 331, 332, 341, 362, 447

Alternative 5: 6, 237, 444, 449

Recommended a mixture of alternatives. 35
182 - Some Alternative 2 & Alternative 4 Spawn Abundance & Hatcheries
196 - Alternative 1 for Habitat & Alternative 3 for Fish Population Mgmt.
236 - Combination of Alternatives 2 & 3.
282 - Combination
346 - Alternative 5 modified
392 - Alternative 5 with two exceptions
405 - Combination of Alternatives
433 - Alternative 3 with additional flexibility

Comment: Current low abundance of wild fish stocks and poor resource health due to harvest by:

Tribes - 6, 8, 19, 53, 57, 72, 79, 92, 113, 137, 143, 144, 151, 173, 179, 197, 209, 225, 287, 243, 259, 287, 308, 379, 422

Commercial nets - 8, 12, 31, 38, 46, 47, 58, 60, 62, 64, 65, 77, 81, 88, 102, 106, 121, 154, 173, 178, 179, 191, 207, 225, 237, 260, 267, 287, 290, 379, 416, 422

Predatory mammals and birds - 6, 52, 60, 62, 64, 65, 79, 90, 91, 103, 113, 124, 125, 144, 152, 153, 154, 209, 210, 225, 237, 258, 388, 416

High Seas fisheries/trawlers - 12, 60, 62, 79, 113, 210, 260, 415

Fisheries outside Washington (Canadian, International, Alaskan) - 28, 97, 113, 123, 138, 205, 248, 360, 375, 378, 442

Fix habitat primary (before restricting fisheries more) - 3, 7, 8, 54, 58, 60, 73, 77, 78, 79, 81, 84, 101, 102, 115, 116, 128, 139, 141, 144, 150, 152, 155, 158, 170, 175, 222, 242, 244, 253, 262, 269, 273, 277, 292, 295, 324, 328, 339, 346, 348, 355, 359, 360, 376, 378, 382, 389, 395, 396, 397, 408, 417, 420, 434, 442, 446

MSY: support reevaluation for natural populations & oppose buffer above - 87

Support MSY approach: 203, 256, 289, 340, 358, 362, 421, 457

Concerns about MSY approach: 101, 120, 242, 315, 320, 387, 388, 396, 399, 400, 446

Responses:

Tribes: fishing is conducted in accordance with federal laws.

Commercial net: fishery is conducted in accordance with state laws.

Predators: Most or all of the important salmonid predators are protected by federal laws and their management could not be addressed under the SEPA process. In essence, society has recognized these predators as legitimate "users" of the salmonid resources.

High Seas: Incidental Mortality in High Seas Fisheries

Mathews (1997, p. 33-35) states as follows:

> "Both bottom trawling and high seas gillnetting are frequently blamed for causing declines of North American salmon stocks. There is relatively good evidence, however, that catches of chinook salmon in either of these fisheries have been relatively inconsequential compared to the incidental catches of chinook in the directed domestic sport and commercial salmon fisheries.
>
> The domestic trawl fisheries from California to the Bering Sea have been well sampled by on-board observers whose jobs are, among other things, to estimate the incidental catches of salmon, halibut and other prohibited species. Erikson and Pikitch (1994) analyzed California to Washington trawl observations from several thousand representative hauls made between 1985 and 1990; chinook catch rates were relatively low. They extrapolated the observed 1987 chinook salmon catch rates over the entire 1987 California-to-Washington trawl fishery effort, and estimated that the total trawl catch was 7,761 chinook, mostly immatures, which was about 1% of the 1987 ocean troll and sport catch of California, Oregon, and Washington. Berger (1996) estimated the 1990-1996 incidental trawl fishery salmon catches for the entire U.S. from observer data. This represents most of the trawl catch by all nations, since no other

countries but Canada now trawl these waters, and the Canadian trawl catch is relatively small. Observer coverage was 100% for U. S. trawlers longer than 125 feet and 30% for vessels 60-125 feet. Vessels less than 60 feet were not monitored by observers; sampling of their catches was done on shore, thereby missing some, if not most, chinook. However, groundfish taken by trawlers less than 60-feet represent a minor portion of the total trawl catch. According to Berger, the trawl fisheries averaged 63,500 chinook per year, which was about 2% of the average 1990-1996 Pacific ocean catch by all sport and commercial fisheries including trawling. About two-thirds of the incidental trawl catch of chinook was from the Bering Sea/Aleutian Islands region and would be fish of primarily western Alaska origin, stocks in relatively good condition. Thus, there seems little evidence that trawling has been a significant factor causing reduction of chinook stocks from more southerly latitudes.

The relevant high seas gillnetting was of two forms: (1) the Japanese mothership fleet, that specifically targeted on salmon; this fishery operated primarily in the Bering Sea/Aleutian's and was restricted to operate west of 176 degrees west longitude (Central Aleutians) under the North Pacific Fisheries Treaty; and (2) the flying squid fisheries of Japan, Taiwan, and Korea which operated in the approximate latitudes of Southern California to Washington and east to about 150 degrees west longitude (Kenai Peninsula).

The salmon mothership fishery took major quantities of N. American salmon of all species, including up to 700,000 chinook annually at its 1980 peak. Most of the chinook taken by this fishery were from rivers of central and western Alaska (Yukon, Kuskokwin, Bristol Bay, Kenai, etc.) according to scale analysis (Myers, et al. 1987), and the uniquely high 1979-80 catches were apparently related to unusually high recruitment from western Alaska in those years (K. Myers, Fisheries Research Institute, U.WA., personal communication). The last year of directed high seas gillnetting for salmon by the Japanese was 1991. Under international agreement, this fishery then ceased entirely, although for a number of years before 1991, it had been scaling back, in response to political pressure from U.S. and Canada, and declining economic returns.

Under the directed salmon gillnet fishery by the Japanese, there are not good records of the incidental salmon catch by the squid fishery, although there is considerable evidence that salmon catches were substantial and that salmon may have been targeted under cover of squid fishing. However, from what is known of chinook at sea, particularly fall chinook which are nearshore in their ocean distribution, it is unlikely that the squid fishery took many chinook. Other species probably made up the bulk of the squid fishery catch of salmon. Under U. N. agreement all high seas gillnetting, including that for squid, became illegal under international law after 1992. Some sporadic, illegal high seas gillnetting of salmon occurred after 1992, but by 1996 this had virtually ceased. The U. S. Coast Guard maintains strong surveillance, utilizing observations of merchant and other ships at sea, coupled with limited aerial and on-water patrols. Such salmon fishing would not only be subject to vessel seizure and severe penalties, but would probably be unprofitable at today's low salmon prices (L. Low, USNMFS, Seattle, personal communication). It is unlikely that high seas gillnetting was a significant contributor to the decline of chinook salmon. We should not use high seas gillnet fisheries, which have all been closed, as an excuse to delay cleaning up our domestic harvest management problems."

Fisheries outside Washington (Canadian, International, Alaskan): This was outside the scope of our present efforts and could not be dealt with in a meaningful way via the SEPA process.

Fix habitat first: refer to previous response.

All MSY comments: refer to previous detailed responses to same subject.

Responses to Written Comments to Habitat Element for the Wild Salmonid Policy EIS

Policy Development and Implementation

1 **Comment:** Indian Tribes need to be included in a joint policy.

10, 241, 271, 279, 282, 283, 289, 301A, 317, 320

Response: We agree. WDFW has worked with the Tribes and will continue its efforts to develop a joint policy or agreements with individual Indian Tribes. However, WDFW cannot require that Tribes agree to a policy.

---

2 **Comment:** Other agencies must coordinate efforts in developing and/or implementing the WSP, including state and federal land and water management agencies, Governor's office and Natural Resources Cabinet must provide leadership, use Oregon model.

11, 17, 52, 61, 63, 66, 132, 158, 166, 175, 203, 232, 247, 262, 271, 277, 278, 282, 289, 317, 319, 320, 324, 328, 340, 346, 354, 359, 364, 369, 380, 387, 390, 392, 399

Response: We agree. WDFW has engaged other state agencies since the beginning of policy development and will continue to do so. WDFW is a member of the Governor's Joint Natural Resources Cabinet (JNRC) and will be very active in contributing to a salmonid protection and recovery plan to be developed by the Cabinet. It is anticipated the Wild Salmonid Policy will be a key underpinning of that plan. It is also anticipated the JNRC will examine and profit from the Oregon Coastal Salmon Recovery Initiative and from other resource planning models in the preparation of a Washington plan.

Policy Scope

3 **Comment:** Need to place the WSP in context with the overall management of fish and wildlife habitat, need policy that would address all the other fish and wildlife habitat and human needs (ecosystems, biodiversity).

4, 167, 232, 239, 288, 320, 411, 414

Response: Comment noted. Although this policy is intended for the direct benefit of salmonids, many of the goals and action strategies will benefit other wildlife and human needs. Local watershed groups could exercise the option to broaden the planning scope to include wildlife and other issues.

---

4 **Comment:** The habitat component of the DEIS covers many of the key factors that impact fish habitat in the region. However, several important components are omitted. The discussion and

proposed management actions focuses on the physical attributes of habitat (LWD, sediment, hydrology, etc.). However, very little attention is given to biological interactions and their impact on salmon populations, other than a very brief mention in the "Ecological Interactions" section. Interspecific interaction is an important component of fish habitat. The characteristics of fish communities in many aquatic ecosystems in the state has been dramatically altered as a result of introductions of exotic stocks and species. These introduced fishes compete with and prey upon native fishes. The plan does mention introduced warmwater fish species, but we could not find any discussion of the impact trout management in lowland lakes has had on wild salmonid populations. A much more complete treatment of this issue is required.

471

Response: We agree. Changes have been made in Chapters II and V.

---

5 **Comment:** Need a broader base of strategies to accomplish the habitat goals, including legislative, biological, and educational approaches and their action plans.

270

Response: We agree, but additional detail is beyond the scope of this FEIS; this would be developed in an implementation plan or local watershed plan.

Stewardship

6 **Comment:** We all must take responsibility for protecting and restoring habitat in order to restore fisheries and ecosystem health.

8, 10, 11, 12, 27, 28, 29, 57, 77, 93, 94, 155, 158, 161, 164, 200, 206, 214, 293, 320, 328, 330, 363, 376

Response: We agree.

---

7 **Comment:** People need to be motivated, inspired, and educated; they need a vision of what future could look like, where all beneficial uses and users of water co-exist in harmonious prosperity. People want to know what they will get for their investment and when that investment will be returned.

35

Response: We agree.

---

8 **Comment:** Water quality and habitat are important but the degree of protection or intensity of restoration must remain in balance with other societal values such as economic productivity, private

property right, and individual choice, must recognize interdependent resources, leverage economic health for environmental protection.

9, 16, 144, 187, 347, 363

Response: We agree.

---

9 **Comment:** Encourage an integrated approach; water quality, water supply, flood hazard management and fish habitat are all inextricably related, more cost-effective, more opportunity for (mutually acceptable solutions), protection and restoration of salmonid habitat will also improve water quality, reduce erosion, attenuate stormwater runoff, improve wildlife habitat, improve human habitat.

29, 139, 249, 295

Response: The Preferred Alternative (3) includes similar language.

---

10 **Comment:** Riparian owners who affect directly or indirectly affect stream habitat should be considered a steward of that stream, should take a direct role in recovering stream or be taxed according to the scale of usage.

58, 363

Response: Comment noted.

---

11 **Comment:** Policy will lead to continued habitat losses if left to other resource managers, users, and local policy makers.

11, 53, 301

Response: Comment noted.

---

12 **Comment:** Need to strengthen environmental laws and regulations before stocks are listed under ESA, longer we wait the worse the economic impact will be.

43

Response: Comment noted.

---

13 **Comment:** Believes the ESA is being abused. There are plenty of salmon. Wetlands protection is also being badly abused all over the country. Believes the government is over regulating.

291

Response: Comment noted.

---

14 **Comment:** Need to conduct an economic study of impacts of habitat element.

172, 311, 317, 319, 425

Response: An economic impact study is beyond the scope of a programmatic FEIS on policy. However, an economic analysis may accomplish rules or specific projects in the future.

Policy Format

15 **Comments:** (Note - The consolidated comments displayed here are a summary of responses from the 12 public meetings held across the state in April, May, and June 1997 to the question: Should the habitat portion of the WSP be general or specific?)

Specific: 11, 12, 19, 38, 54, 73, 94, 99, 112, 116, 117, 118, 120, 129, 185, 186, 187, 188, 189, 190, 200, 204, 205, 244, 257, 326, 339, 349, 351, 363

- Specific guidelines with specific goals, specific accountability on violations - 8, 93, 100, 184
- To the point there is no doubt about intent - 36, 39, 53
- Based solely on scientific and historical data - 36
- Need some specifics but not be prescriptive, not enough known to create the performance standards -61, 298
- Need to provide guidelines, measurable objectives, and a schedule for implementation in the EIS - 35, 156
- Specific in detail but general, flexible in application - 104, 183, 203, 251
- Habitat standards are needed for all LWD, oxygen, pH, etc (state standards) - 132
- Urban/Rural may have to be more specific - 108
- Focus on and support the regional groups and non-profits working on habitat projects - 119
- Focus on juvenile habitat (winter and summer) - 119
- General not practical - 164
- Specific guidance for use by watershed groups, to avoid local politics/over-representation - 182, 228
- Specific to habitat in the water, should not restrict upland use - 210, 213
- Specific on public land - 310
- The final policy must expressly state base performance standards for habitat protection on all lands (public, federal and private) out to at least 300 feet from all salmonid bearing streams in the state. Standards must rise with increasing proximity to the stream. - 156

General: 33, 57, 80, 82, 111, 163, 165, 178, 180, 190, 193, 211, 278, 305, 307, 413

- Specifics will come from local councils, local situation, local conditions and needs - 9, 13, 35, 47, 58, 68, 97, 106, 114, 192, 195, 197, 201, 207, 208, 226, 259, 266

- Need landowner buy-in, work with landowner - 9, 202, 212
- Need cause/effect relationships between practices and habitat, then specific solutions - 9
- Use performance standards related to numbers of fish, performance measure should be the percentage of downstream migrants, rather than returning adults - 35
- General goals with site specific rules through TFW, FFW(Farm/Fish/Wildlife), etc - 108, 196
- List the types of habitat in detail, but not all the elements involved in each type - 109
- Unlikely that one size fits all - 199
- Should consider, elevations, rainfall, temperature, geology, geography - 201, 215
- General guidelines with specifications for special needs - 216, 308
- General on private land - 310
- Policy is far more detailed than most policies of this type and borders on being a "recovery plan;" Should be more general with specific standards contained in an implementation plan - 232

Specific Planning/Implementation: 54
- Specific to river system, measurable objectives - 32, 92, 94, 166, 181, 206, 212, 223
- Every watershed should have a priority habitat plan based on potential rearing capacity- 20
- Specific recovery plan that establishes level of recovery (minimum and maximum levels of populations) that will allow fishing - 25,28
- Needs more specificity regarding "targeting" of existing high quality production areas versus those that would require extraordinary effort to enhance or restore**,** needs direction and optimization for specific geographical areas within the state - 174
- Should be stock specific - 166,170,209

Combination of Specific and General Direction: 102
- Don't know: 195, 224
-Don't need state control - 192

Response: Comments noted. The Preferred Alternative (3) has been modified. The recommended performance measures are specific, but additional site flexibility has been incorporated into the alternative. These comments will be considered in the actual policy.

DEIS Alternative 1 Preferred

16 **Comment:** Prefer Alternative 1 even with the status quo, many significant actions will occur to benefit salmonids.

107, 232

Response: We agree, see Chapter V.

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17 **Comment:** Prefer Alternative 1, should use Regional Enhancement Groups instead.

107

Response: Regional Fisheries Enhancement Groups would be included in Alternative 3, but not as a stand alone option.

---

18 **Comment:** WDFW should direct its watershed planning efforts to existing forums or proposals established by county commissioners or the legislative leadership, would not support separate WDFW process, nor would most other principal stakeholders.

174, 365

Response: See Comment 2.

---

19 **Comment:** Have previously proposed to work with WDFW and NMFS on direct, pragmatic measures for salmon recovery, but have been rebuffed by state and federal agencies who seem to be more interested in process and regulatory enforcement.

174

Response: Comment noted.

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20 **Comment:** With the exception of Alternative 1, all alternatives seem to mandate the same standards with the attainment of the standards a matter of mechanism and timing.

148, 245

Response: We agree. That was our intent.

---

21 **Comment:** Support the concept of locally-based watershed planning, but do not endorse any alternative.

314

Response: Comment noted..

Do Not Prefer Alternative 1

22 **Comment:** Perpetuates a management approach responsible for the present crisis.

10, 35, 45, 95, 265, 300, 317, 320, 324

Response: We agree.

Prefer Alternative 2

23 **Comment:** Imposes toughest habitat protection and restoration standards, based on best available science, these standards should prevail unless local planning imposes more stringent standards

10, 26, 45, 56, 63, 77, 105, 139, 142, 146, 175, 220, 238, 239, 241, 242, 253, 264, 265, 288, 293, 295, 297, 300, 301A, 309, 320, 321, 324, 328, 344, 348, 353, 364, 373, 387, 397, 412, 418, 420, 423, 438, 442

Response: Comment noted.

Do Not Prefer Alternative 2

24 **Comment:** Too top-down, prescriptive, and punitive- will be resisted and resented. *(See also: Previous comments on policy format)*

35

Response: We agree.

---

25 **Comment:** Probably too difficult to implement and enforce.

95, 101

Response: We agree.

Prefer Alternative 3

26 **Comment:** Emphasizes local watershed-based approach, fairness, and flexibility, call for monitoring.

10, 24, 29, 35, 43, 76, 81, 95, 101, 131, 150, 158, 159, 177, 219, 232, 236, 238, 267, 271, 274, 287, 300, 303, 306, 333, 342, 358, 359, 373, 379, 384, 389, 404, 410

Response: We agree.

---

27 **Comment:** Relationship of locally based watershed planning to existing state regulatory responsibility should be further clarified. Such responsibilities are very real and not a default to be implied. State and federal regulatory authorities will not be relinquished during locally based

watershed planning. But these authorities should be used in a manner that supports locally based planning. Regulatory action may be taken wherever standards and requirements are not being met and voluntary actions are either not being taken or are insufficient to achieve compliance.

271

Response: We agree. See Chapter III.

Do Not Prefer Alternative 3

28 **Comment:** Local watershed planning has not worked, too costly for agencies, not enough locals with time to commit, impedes the efforts of those involved in restoration efforts, too much ambiguity and discretion left up to local watershed councils, not enough political will to protect habitat.

107, 146, 156, 227, 253, 265, 296, 320, 328, 353, 364, 397, 401

Response: Although watershed councils have not been completely successful in the past, WDFW believes the climate is right for them to be more productive and responsive.

---

29 **Comment:** Overly conservative, too much emphasis on habitat.

318, 369

Response: Comment noted.

---

30 **Comment:** No detail on cost, timelines, cooperation, funding

329, 370

Response: Additional detail is beyond the scope of this EIS.

Page Specific Comments

31 **Comment:** Page 32 - States "Alternative 3 would rely principally on locally based watershed planning efforts." This option would strongly encourage local problem solving with state, local and federal agencies at the table without even mentioning the tribes. Thus, this paragraph clearly indicates that WDFW intends to exclude the tribes from local planning efforts. Furthermore, the DEIS and the policy have failed to provide sufficient information to evaluate the ability of local problem solving to deal with the issues, nor appraised local agencies of the constraints upon many of the purported mechanisms to achieve restoration. For example, the DEIS lists the estuarine, wetland, and habitat losses in excess of 90 percent in Elliott Bay. The practicality of restoring

wild salmonids in this watershed should be fully discussed given the constraints of such habitat losses. Given these constraints, the EIS should explain how harvest will be maintained in such instances.

401

Response: Alternative 3 has been rewritten to include the tribes in these planning processes. This level of detail is beyond the scope of the EIS, but could be provided in a implementation plan.

---

32 **Comment:** Page 33 - The recent good habitat efforts referred to here should be listed, or cited.

401

Response: There are over 270 watershed groups or councils around the state, some very broadlly focused, others more narrowly focused. Examples existing and on-going efforts include the Dungeness River Management Team, the Cedar River Council, the Nooksak Initiative, and the Willapa Alliance.

---

33 **Comment:** Prefer a blend of Alternatives 2 and 3.

236, 303, 315, 317, 389

Response: Comment noted.

Prefer Alternative 4

34 **Comment:** Prefer Alternative 4 with defaults to regulation where locally-based plans do not address the issue.

35, 271, 330, 332, 340

Response: Comment noted.

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35 **Comment:** Do not prefer Alternative 4 - 317
-Under-emphasizes the need for a watershed based approach - 45, 324
- Not restrictive enough - 101

Response: Comment noted.

---

36 **Comment:** Page 35 - In concept it may be useful to have individual state agencies review existing programs and adjust them to implement the policy. However, many of these state agencies do not have the technical expertise to make such recommendations. Fish and Wildlife should take the leadership role for such a proposal and not rely on the other agencies to do such an effort.

401

Response: See comment #2.

---

37 **Comment:** Page 35 - It is unclear if the 150 foot buffer under this alternative would apply to all watersheds and existing developed areas. Furthermore, there is no criteria identified to determine if the 100 foot buffer or variable width buffer would provide the functional characteristics.

401

Response: Buffer would apply to all land uses. See revised Alternative 3 in Chapter III.

---

38 **Comment:** Page 37 - TFW Forestry Module - DEIS states "The participants of the TFW group would develop recommendations for rule changes as necessary, and consistent with the Wild Salmonid Policy's general guidance to the State Forest Practices Board." What is the source of this statement that there is agreement? Is there agreement that the standards need to be increased or to be decreased? If there is agreement, then the nature of that agreement should be stated and cited.

401

Response: TFW includes federal, state, and local agencies as well as Indian tribes, environmental groups, etc. WDFW, as a party to TFW, has agreed to participate in the development of the Forestry Module which we expect to provide significant improvement over existing minimum standards in the Forest Practices Act rules. There is general agreement that the rules need to be improved.

Alternative 5

39 **Comment:** Prefer Alternative.

35, 319, 346, 411

Response: Comment noted.

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40 **Comment -** Do Not Prefer Alternative 5.

10, 45, 101, 300, 317

Response: Comment noted.

41 **Comment:** Support any alternative.

343

Response: Comment noted.

No Acceptable Alternative

42 **Comments:** No acceptable alternative.

66

Response: Comment noted.

43 **Comments:** Policy has no chance of working, natural conditions do not exist, not realistic to try to re-attain them, - unrealistic in an urbanized watershed to expect recovery of wild stocks to a level that would replace existing hatchery production and meaningful harvest.

292, 401

Response: Comment noted.

44 **Comments:** Cannot support any alternatives in the draft, Alternative 5 headed in the right direction.

319

Response: Comment noted.

45 **Comments:** None of the alternatives goes far enough: no tribal involvement, not enough detail on state agency coordination (need governor's office oversight board), no commitment to "no net loss".

256, 269

Response: See comments #1 and #2.

46 **Comment:** Difficult to assess the differences because of lack of detail

174, 263, 275, 401

Response: The level of detail requested is beyond the scope of a programmatic EIS; could be addressed in an implementation plan or local plan.

47 **Comments:** Needs different format, DEIS should be reissued and explore the following alternatives as stand alone alternatives: Harvest restrictions, habitat protection and restoration, enhancement of stocks through hatcheries and other means, no action (status quo), full enforcement of existing regulations, and combinations. The DEIS should document how each water resources inventory area/harvest management area would be affected by each of the alternatives. For habitat, this would include an assessment as to how effective the alternative would be for each issue identified under the main topics of Habitat and Hydrology. This would allow the ability of the policy and applicability of the plan to various basins be evaluated. This would enable the plan to become more local in nature, the goal of the preferred alternative as specified in the DEIS.

401

Response: The level of detail requested is beyond the scope of a programmatic EIS; could be addressed in an implementation plan or local plan.

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48 **Comment:** No for hatcheries, yes for habitat, no for harvest, yes for fish.

78

Response: Comment noted.

---

49 **Comment:** Relationships between habitat conditions and salmonid productivity have not been well-defined (although efforts are currently under way to define them). Until this is completed it will be very difficult to make any progress towards implementing any action strategy for any alternative.

232

Response: Decision making is certainly enhanced by precise information. However, even though these relationships are not quantified, there is sufficient surrogate information to make reasonable choices regarding protection of salmonid habitat; natural resource planning is replete with decisions made on less than perfect information in the past and will likely continue to be while we refine our existing knowledge base.

Impacts to Affected Environments:
Natural Environment

Introduction

50 **Comment:** There is scientific evidence that 200-300 years before the white man came, there were periods of no salmon, coastal Indians ate crabs and clams.

140

Response: There is no dispute that salmonid populations as a whole fluctuate in number over long periods.

---

51 **Comment:** In the Puget Sound area, most of the lower elevations where a large percentage of the spawning takes place, the land is flat or only gently sloping interspersed by glacial terraces. A good number of these lands are managed as small tree farms. Well managed, these areas provide ideal spawning and freshwater rearing for salmonids. But un-managed will be detrimental to habitat.

144

Response: We agree. Alternative 3 encourages retaining forest lands in these areas in order to protect salmonid habitat.

---

52 **Comment:** DEIS states that the current canopy conditions in forested habitats are much more open than they were prior to European settlement. There have been extensive reports (the Upper Columbia Basin Assessment - USFS/BLM) that have come to exactly the opposite conclusion.

148

Response: The context of the DEIS is that riparian area conditions on average across the state are in a much more impoverished state (i.e., remnant or non-existent vegetation) due to conversion of forest lands to other uses. We concur that for much of the east side forest lands, stand conditions are more closed, primarily because of decades of fire suppression.

---

53 **Comment:** The DEIS cites Palmisano study indicating the fish problems are related to a myriad of causal mechanisms, yet the DEIS provides no quantification to be used to set priorities for actions.

148

Response: This level of detail is beyond the scope of the EIS; should be addressed in implementation planning.

---

54 **Comment:** Some western Oregon studies show that, prior to European settlement, optimal habitat conditions were present on only 65% of the stream reaches, yet the DEIS calls for 100% optimal habitat; this does not appear to be correct policy when considering a balanced ecosystem approach.

148

Response: The policy intent is to portray those conditions and processes necessary to salmonid habitat over the long term and across a variety of landscapes. It is anticipated that watershed planning would include basin analysis of existing habitat conditions and possible improvements to the habitat. This would be balanced against other needs in the watershed and collectively the planning process would define desired future conditions, including the means and time lines required to achieve them. It is unlikely that a 100% optimal condition would result from this process.

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55 **Comment:** No "best available science," as required by RCW 36.70A.172, is anywhere in existence.

198

Response: We disagree. The DEIS is well-documented and based on up-to-date science.

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56 **Comment:** The DEIS proposes to return all streams to their natural condition. It presumes that all streams should exhibit all the desirable features associated with salmonid habitat in their entirety. Such conditions were never maintained by nature, yet the fish survived and flourished, may not need to return all habitat to that state.

361, 411

Response: The policy recognizes the positive and negative effects of natural disturbance. What is trying to address and avoid is the frequency, magnitude, duration and often lack of recovery from human-caused impacts. See also comment #54.

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57 **Comment:** The action strategies are good but frankly are a tall order.

471

Response: The DEIS states essentially the same thing. Restoration will require fundamental changes in values and attitudes, in addition to enormous amounts of planning, collaboration, and funding.

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58 **Comment:** Page 2 - The policy states "Our goal is not only to keep stocks from going extinct, but to maintain them at healthy levels that can provide a variety of harvest, cultural, ecological, and other benefits. The WSP goal avoids the ESA problem by maintaining stock levels well above the

ESA." It is difficult to ascertain how the WSP avoids the ESA problem when the proposed default riparian buffers in the DEIS are equivalent to, or less than, those being adopted for some habitat conservation plans. Gives examples of timber companies with buffers of 200 and 160 feet along salmonid bearing streams. Buffers in the HCPs have offered some harvest, but the policy does not specifically state that the harvest will not be permitted in the riparian buffer. Furthermore, the buffers specified in the WSP can be decreased in size if watershed analysis is done. There is basis for concern that watershed analysis may lead to a decrease in riparian buffers. Indeed, industry representatives have stated in meetings that the buffers as specified in HCP should be the maximum and are not applicable to the development of prescriptions in areas not covered by an HCP. As a proposed interim, WSP buffers are fundamentally equivalent to buffer widths determined as needed to minimize, but not prevent the threat of extinction. In the proposed WSPs are insufficient to maintain the stated goal of maintaining stock levels well above the ESA.

401

Response: We disagree. We feel our riparian buffer recommendations would, on balance, provide for a variety of land uses and activities across the state where salmonids occur, provide adequate protection and protection well above some minimum required to address ESA concerns. Watershed analysis could also result in buffers above our recommendations. It is also important to place the issue of riparian buffers in the overall context of watershed processes. Buffers alone will not provide habitat protection. See also comment #38 regarding the TFW forestry module.

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59 **Comment:** Page 4 - The policy states "No effort should be invested in those places where maintenance of wild salmonid populations is no longer possible due to changes in the habitat." This statement could be interpreted to mean that any effort will not be placed in the system, such as Lake Washington and the Green River where many stocks are dependent upon hatcheries and the habitat essential for some species is mostly lacking due to actions approved by the Department of Fish and Wildlife and its predecessors. This section illustrates a fundamental flaw in the DEIS which purports to support local management of habitat, but makes broad-brush statements about the alleged ills of hatcheries. The discussion of priorities instead of being a series of rhetorical questions, should be altered by identifying different policies for areas with varying degrees of injuries to freshwater and estuarine habitat.

401

Response: Comments noted. See also comment #55.

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60 **Comment:** The alternative summary matrix should be moved into Chapter 1 or the beginning of Chapter 2. The DEIS should include a detailed table showing the differences between the alternatives and a summary of the impacts. The DEIS should identify all stocks at risk with a table detailing those land use practices listing as a contributing cause to the decline without placing stock status in terms of ongoing impacts with cumulative alterations to essential habitat is nearly impossible to evaluate the ability of the policy to achieve its goals. For example, over 95 percent of the Duwamish estuary has been filled or altered. Perhaps the greatest proportionate habitat loss. Juvenile chum and chinook are dependent upon the estuary for early rearing. The proposed policy

as outlined on Page 4 may deem to not restore estuarine habitat on the Green/Duwamish system due to cost and extensive habitat modifications. Thus the continued low levels of stock will be maintained, if at all. However, the policy may proscribe the use of hatcheries to maintain harvestable numbers of estuary dependent chinook. The differences between performance standards and performance measures needs to be made clear with intent regulatory enforcement and liability.

401

Response: This level of detail is beyond the scope of a programmatic EIS, but should be addressed during implementation planning.

---

61 **Comment:** Page 9 - A considerable portion of the habitat discussion is based upon Priority Habitat and Species guidelines which were never adopted in whole. It is not clear as to how Fish and Wildlife will ensure that a similar fate is not in store for the WSP.

401

Response: The PHS-Riparian document was only one of numerous sources used in the DEIS. As we have stated in numerous public meetings and other arenas, the Fish and Wildlife Commission intends to adopt a Wild Salmonid Policy during the late summer or fall of 1997.

---

62 **Comments:** Page 9 - Regarding watershed analysis, the DEIS states "This tool assesses salmonid habitat and develops prescriptions assigned to protect instream resources while allowing certain levels of forest practice activities." The statement is a blunt, oversimplification of a process which is more aptly described as a process that continues forest harvest with some level of protection afforded to instream resources. Furthermore, this statement is not borne out by a recent review of the watershed analysis process which revealed a high percentage of the prescriptions purportedly to protect public resources did not follow from the resource assessment, were experimental, and indeed were even speculative. That report is Brian Collins and George Pess, 1997 - Evaluation of Forest Practices Prescriptions from Washington's Watershed Analysis. Manuscript submitted to the Journal of American Water Resources Association.

401

Response: Comment noted. While WDFW is a frequent participant in watershed analysis, we too are not always fully satisfied with the level of protection that results from the prescription. Nevertheless, we still subscribe to the process and will continue to work with the forest products industry to improve the process and the product.

---

63 **Comment:** Page 9 - The WSP states that the Growth Management Act "has brought some improvement in habitat protection" Critical areas that are adjacent to existing development are not necessarily protected. Most local governments apply critical areas to new developments. In basins where most of the development has occurred, this is a significant issue.

401

Response: We agree. Text in chapter III has been revised.

---

64 **Comment:** Page 10 - Though Table 3 lists the geographic scope of various programs, the DEIS should distinguish between which land use actions can be regulated by the WDFW and for those actions not regulated by the WDFW. Other responsible agencies should be identified and how the programs will be modified as a result of the policy.

401

Response: This table provides sufficient detail for the EIS. See also comment #2.

---

65 **Comment -** Page 20
- Alternatives 2 to 5 represent mitigation for a number of impacts to the natural environment. Alternatives 2 and 5 are not distinct alternatives, but are basically one alternative with different levels of enforcement and implementation. Are alternatives 2 to 5 viable alternatives to alternative 1 or are they stated here as mitigation for alternative 1? If they are indeed mitigation for alternative 1, they should be discussed as such, not as alternatives. This section further reinforces the view that the presented alternatives are not alternatives, but measures arising from different levels of implementation and enforcement of a single alternative.

401

Response: We feel the alternatives are appropriate and distinct from one another. At least one of the alternatives capture the main sentiments of the Northwest Indian Fisheries Commission staff and a WDFW key constituent group that represents wide interests including fishing, environment, and the forest products industry.

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66 **Comment:** Page 20 Alternative 2 - The DEIS states "Many of the impacts to the built environment are shared by all alternatives." The impacts to the built environment should be specified for each alternative.

401

Response: See revisions in Chapter V.

---

67 **Comment:** Page 20 - D - The policy states "We assume the new alternatives are each sufficient to perpetuate stocks, and that ESA listings generally will not be necessary." The supporting documentation to this statement should be included in the attached appendix, especially since many of the actions proposed are outside of the scope of Fish and Wildlife to implement. Also, it is doubtful with standards less stringent that some required in habitat conservation plans, that the alternatives are sufficient to avoid listings and achieve the goal of providing harvestable fish.

401

Response: We disagree. Applied fully and in good faith, this policy in its entirety should help to provide harvestable numbers of fish. As a stand alone document, it may not avoid listings, but it will provide a good foundation document for implementation plans that could.

---

68 **Comment:** Page 20 - E. - The DEIS states "There is a major, unavoidable, short-term cost to making the required changes." This major, short-term cost should be stated clearly for each alternative, as it is an impact of the policy and hence needs to be discussed in the EIS.

401

Response: See Chapter V.

---

69 **Comment:** Page 20 - The DEIS states "It includes a fairly rigid, state-prescribed package of performance standards and action strategies." Currently there is a statewide package called the Hydraulic Code, but the full extent of its power rarely used. Nor is Fish and Wildlife managed in a way to track cumulative impacts to salmonid habitat which would provide useful information to the Legislature.

401

Response: This statement referred to authority residing in several state agencies and with local government, including the WDFW Hydraulic Code. It is implied that under alternative 2, HPAs would be denied more often or conditioned more restrictively. Under any alternative WDFW would strive to administer the Hydraulic Code consistent with the protection of fish life. It is true we don't currently track cumulative impacts to salmonid habitat. Alternative 3 includes measures that if approved and adequately funded would address this need.

---

70 **Comment:** Page 21 - The DEIS states "Each of the different alternatives proposed for habitat has some potential outcome of providing sufficient amounts of quality salmon habitat to achieve the overall goal of the policy." Again, we are not convinced that by applying some standards that are less than those required to keep salmonids from going extinct via HCPs, that the overall goal of the policy will be achieved.

401

Response: We disagree. See comment #67.

---

71 **Comment:** Page 21 - The DEIS states "The action strategies listed in Appendix C would be fully implemented through existing state and/or local government regulations, or by new legislations or rule making processes." The full implementation of existing regulations should be a separate

alternative. Alternative 2 should document what new regulations or authorizing legislation would be implemented.

401

Response: We disagree. See comment #65. Identification of specific rules and regulations is beyond the scope of the EIS.

---

72 **Comment:** Page 42 - The Affected Environment section should be further broken into WRIA units. Even within such units as the Puget lowland there is considerable variation in the affected environment, especially that extent and nature of the cumulative alterations to salmonid habitat. The limitations that the built environment place upon the implementation of this plan at the local level, and the impact of the implementation of this plan upon treaty fishing at a local, require more detailed discussion. The impacts should be listed on a WRIA specific basis. The preferred alternative is based upon local planning, however, the DEIS provides little information about local situations. Instead of the Appendices being used to document material that should be in the text, the Appendices could be used to provide more basin specific information.

401

Response: This level of detail is beyond the scope of the EIS. Most of Appendix C was brought into Chapter V.

---

73 **Comment:** Page 47 - There is too much emphasis on the Columbia River. Fish and Wildlife must have information of a similar nature for each WRIA. If not, the final EIS should clearly indicate how the current state of the cumulative adverse impacts to salmonid habitat will be determined in order to avoid threshold impacts.

401

Response: This level of detail is beyond the scope of the EIS.

---

74 **Comment:** Page 47 - Groundwater withdrawals can also reduce stream flows.

401

Response: We agree. See Chapter V.

---

75 **Comment:** Page 47 -Bulkheads and other hardened forms of bank stabilization adversely affect salmonid habitat.

401

Response: We agree. See Chapter V.

76 **Comment:** Page 47 - The DEIS states that "As high as 99 and 100 percent in the Duwamish and Puyallup estuaries." This sentence should have a supporting reference.

401

Response: It does. See Chapter V.

---

77 **Comment:** Page 47 - The list of habitat degradation assumes that the hydraulic code will be liberally enforced. For example, bridges could be used in lieu of culverts. HPAs are also required for dredging and bank hardening projects, and the state has the authority to deny the issuance of a permit.

401

Response: We agree. However, the point is that the HPA is reactive to land use. GMA planning that integrates salmonid protection fundamentally through zoning will have a far more significant benefit on habitat processes and conditions than denial of an HPA.

---

78 **Comment:** Page 48 -The DEIS fails to acknowledge that the majority of the converted lowland areas are also the only productive habitat that are not blocked by major obstructions such as dams and some watersheds.

401

Response: Comment noted. We have added language to this effect in Chapter V.

---

79 **Comment:** Page 48 - DEIS fails to acknowledge other extensive losses of habitat due to flood control and municipal water supply development.

401

Response: See Chapter V.

---

80 **Comment:** Page 48 - The DEIS fails to acknowledge that storm water runoff also increases the frequency of higher flows which could have adverse impacts to stream channels, redds, and over-wintering juvenile salmonids.

401

Response: See added text in Chapter V.

81 **Comment:** Page 48 - The statement "Habitat will be degraded through the cumulative impacts of storm water runoff." This statement should be strengthened by the following: "It should be noted that the standards identified in storm water manuals, including Ecology's to prevent aggravation of flooding and erosion problems, do not mitigate all probable and significant impacts to aquatic biota. Fisheries resources and other living components of aquatic systems are affected by a complex set of factors. While employing a specific flow control standard may prevent stream channel erosion or instability, other factors affecting fish and other biotic resources such as increases in the duration of threshold stream velocities are not directly addressed by these manuals. Thus compliance with these manuals may not be construed to mitigate all probable and significant storm water impacts upon salmonids. " This provision would help ensure that developers cannot use storm water manuals as a defacto defense claiming that compliance with the manual mitigates direct and indirect site specific and cumulative impacts upon salmonids and salmonid habitats.

401

Response: Your suggested language was added to Chapter V.

---

82 **Comment:** Page 49 - The DEIS fails to acknowledge that conservation district programs are strictly voluntary and that the proposal to do salmon habitat restoration is not always achieved. There should also be some documentation as to the success of this program in the FEIS.

401

Response: Comment noted.

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83 **Comment:** Page 49 - The FEIS should clearly document in how many instances that Ecology has issued fines with respect to dairy waste control programs.

401

Response: Comment noted.

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84 **Comment:** Page 49 - It is disconcerting that a Kitsap County citation is used to support the statement that "The lower elevation areas which contain some of the most productive forest land, also contain many of the most productive salmon populations." The FEIS should indicate if this statement is true for Kitsap County only or for the state as a whole.

401

Response: Kitsap County was cited as an example where the problem exists, specifically because of their decision not to allocate any forest land for long term forestry; certainly not the only example. See change in Chapter 5.

85 **Comment:** Page 49 - The DEIS claims that "Stream channels that were scoured to bedrock may take hundreds of years to recover." This statement should be supported by a reference.

401

Response: Rewritten and cited more clearly, see Chapter V.

---

86 **Comment:** Page C-1: What are some of the differences in habitat requirements between species?

44

Response: See Chapter V.

---

87 **Comment:** Page C-1: states "Quite often it is very difficult, if not impossible to draw quantitative relationships between habitat conditions and salmonid survival and production." Streams should be evaluated based on their ability to meet salmonid life history requirements, rather than just habitat conditions. It would be better to protect processes as more likely to create conditions required.

401

Response: Both statements say basically the same thing.

---

88 **Comment:** Page C-2 - states we have gone from 4550 stream miles accessible to anadromous fishes in the past to 3791 in the present. How can it also be true that we have lost 3,000 miles to impassable culverts?

471

Response: Text was clarified in Chapter V.

---

89 **Comments:** Page C-2 E. - Amend this sentence to read: "Reproduction is influenced by all the above with the relative of importance varying from basin to basin."

401

Response: Comment noted.

---

90 **Comment:** Page C-3: The DEIS fails to acknowledge the additional impacts to the impervious surfaces and increase storm water runoff including an increase in the frequency of runoff events,

channel destabilization, and most importantly adverse impacts to juvenile salmonids that can occur due to increases in water velocity, changes in water chemistry, loss of habitat.

401

Response: These issues are addressed in Chapters III and V.

---

91 **Comment:** Page C-4: The DEIS states "The protection of existing habitat should be the first priority for habitat actions." This priority is limiting in scope and should be expanded to protect the creation of future habitat.

401

Response: If you mean to protect the processes that create habitat, we agree; it is implicit in our statement.

Habitat Protection and Management Approach And Institutional Framework General Comment

92 **Comment:** Protection should be the first priority, followed by restoration.

251, 289, 320, 324

Response: We agree.

---

93 **Comment:** Support an ecosystem analysis approach for watershed management.

343, 358

Response: We agree.

---

94 **Comment:** Where return numbers are too low, accelerate watershed management efforts to improve habitat.

64

Response: We agree.

---

95 **Comment:** Habitat management and protection should address all life history stages.

132

Response: We agree. Our policy alternative does.

---

96 **Comment:** Need a net gain in habitat in many watersheds.

364

Response: We agree.

---

97 **Comments:** DEIS should include a section as to how each alternative would achieve the goals of the policy. The final EIS should also discuss the limitations of current legislation and regulatory regimes to achieve the WSP goal. The DEIS should be arranged to pull the information from the Habitat Appendices into the body of the document.

401

Response: Chapter V gives a general description of the impacts of the alternatives on the natural and built environment. For the natural environment, the impacts are arranged along the habitat format (i.e., basin hydrology and instream flows, water quality, etc). The level of detail you request is beyond the scope of the EIS. The appendix material was inserted into Chapter V, except for the action strategies.

---

98 **Comment:** The processes by which habitat protection and restoration will be implemented are quite vague. There are many federal, state, county and local laws that pertain to habitat in some way, but a combination of better enforcement and stiffened regulation is needed at a time when some interest groups are successfully arguing for few and less stringent rules. The Timber, Fish & Wildlife process for resolving habitat disputes on state and private forest lands has met with limited success; however, it does not now apply to agricultural lands where habitat protection is spotty at best. The resistance that former Governor Lowry encountered in his efforts to enforce the Growth Management Act in some parts of the state should serve as a warning. A far more comprehensive system of statewide habitat protection is needed, and we hope the present governor has the resolve to follow through with some of the recommendations in this report.

471

Response: Specific implementation details are beyond the scope of the EIS. See also comment #2, #38, and #55.

Desired Future Conditions

99 **Comment:** Set expectations for ultimate results; cannot be set at maximum possible, would drastically impact other water users, goal should be a level consistent with provision of water to all other beneficial users.

35

Response: See comment #55.

---

100 **Comment:** Identify conditions under which habitat enhancement measures would not be implemented.

11

Response: See comment #55.

---

101 **Comment:** Should be more pro-active, should decide which areas probably aren't worth trying to revive, and which areas where habitat can and should be expanded, by constructing spawning grounds, in order to make up for the areas that are irretrievably lost.

35

Response: See comment #55.

---

102 **Comment:** It would be helpful to use more specific habitat terms - define the most critical habitats. There is a lot of "habitat" out there that is not necessarily critical to the health of our fisheries.

61

Response: See comment #55.

---

103 **Comment:** Policy needs to have more prioritization among the major policy elements and provisions. There is little or no mention on what will be the interim policy time-line and practices while all the ecological, habitat, and genetic assessments are being completed.

328, 392

Response: This level of detail is beyond the scope of the EIS.

---

104 **Comment:** Do not use the term "Eco Systems" I have .... never seen a single flock, herd, school, covey, or singular "ECO".

92

Response: Comment noted.

---

105 **Comment:** Do not accept continued decline in habitat.

182

Response: Comment noted.

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106 **Comment:** Ensure rivers, habitats, watersheds protected.

164, 190, 192, 203, 208

Response: Comment noted.

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107 **Comment:** Mitigation banking needs to be included.

35, 330

Response: Comment noted.

---

108 **Comment:** Improve stream typing system and verify typing.

54, 354

Response: Comments noted.

---

109 **Comment:** The Clean Water Act set down by the regulatory agencies is probably not the right approach for habitat protection and regulation.

100

Response: Administration of the Clean Water Act is improving to use the more broadly interpreted definition of water quality to include healthy and abundant aquatic species not just water chemistry and condition. EPA is assuming an active role in salmonid restoration.

---

110 **Comment:** Need more protection of upper watersheds and tributaries.

116

Response: Comment noted.

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111 **Comment:** Need more protection of lower river areas.

38

Response: Comment noted.

---

112 **Comment:** Add deed supplements to identify presence of salmon-bearing streams.

202

Response: Comment noted.

---

113 **Comment:** Base regulations on science, not politics.

187

Response: Comment noted.

---

114 **Comment:** ESA is a better tool than WSP, WSP had better work or ESA will come.

189

Response: Comment noted.

---

115 **Comment:** Base habitat program on watershed level processes.

170

Response: Comments noted.

---

116 **Comment:** Need to include discussion of habitat refuges.

320, 359

Response: Habitat refuges can be an integral part of a protection and restoration strategy developed. It is one of the purposes for habitat acquisition. Refugia are best provided on publicly-owned lands, but can logically occur on private land as well. See also comments on acquisition below (#121).

117 **Comment:** Gaps in data and monitoring efforts should be identified and remedied.

404

Response: We agree. Included in Alternative 3.

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118 **Comments:** Note the following comments are the result of a survey taken at the public meetings on the DEIS - Is acquisition of key habitat is a good strategy for restoration of wild salmonids?

Yes: 8, 11, 19, 20, 28, 33, 46, 48, 49, 53, 55, 57, 58, 61, 62, 68, 71, 80, 82, 89, 93, 94, 98, 99, 104, 106, 112, 118, 119, 123, 129, 163, 166, 170, 178, 182, 183, 184, 185, 186, 188, 189, 190, 193, 194, 199, 202, 204, 205, 206, 207, 208, 209, 211, 215, 222, 257, 298, 310, 351.

Where there is no other viable alternative and landowner is compensated for loss of private property - 9,196,226

Good investment for all wildlife - 17, 54, 251

In combination with adequate flows, or acquire water rights - 200, 349

In areas projected for urbanization - 197, 354

If upstream and downstream issues affecting the acquisition are compatible with habitat needs - 223

Utilize land trades - 259

Apply at watershed scale (e.g. Elwha dams) and use as demonstration project - 187, 189, 259

If voluntary free-market, no condemnation or pressure - 16, 39, 114

If landowner is active steward and will protect habitat, continued adequate funding for acquisition and management, no conversion to other uses (e.g. Hanford Reach agriculture) - 97, 100, 109, 189, 200, 216, 363

WDFW should assume a leadership role in making land trades a top priority at the state, federal and local levels -58, 111

Should engage in trades with landowners where state acquires sensitive lands and landowner acquires less sensitive, more manageable lands in trade - 111, 202, 355, 364

Divert some funding from hatcheries toward habitat enhancement - 116

Where affordable and positive cost/benefit - 13, 187, 202

Where access for fishing, recreation is provided - 164, 165

Eagle Island area of E.F. Lewis should be acquired - last healthy wild fall chinook spawning area in lower Columbia River - 248

In combination with restoration - 326, 355

In addition to conservation easements and must be perpetual protection - 339

No-90, 92, 180, 201, 213, 413

Not critical if grass-roots organization develops good relationship with landowners - 13

Government is buying too much land - 12, 307

Should belong to the state citizens - 181

Key is to offer incentives that encourage participation - 25, 108,117, 197, 226

Waste of taxpayer dollars, use what you have well - 32

Restore existing - 179

Do not use taxpayer's money to take land off the tax roles - 36, 361

Not if bought or acquired by WDFW, state not good land manager - 47, 212

Not with limited dollars available - 108, 191, 244, 361
Conservation easements, agreements more cost effective - 108, 163, 202
Use money for enforcement and restoration - 120
Not enough money, just sue those who damage habitat (a public resource) for compensation - 228
Not necessary or possible - 100 years too late - fate of wild fish sealed with population growth - fish will continue to decline - 121, 196
Limit ocean sport/commercial take - 224
Need better escapement - 191, 224, 305
State owns more than it can effectively manage - 195, 210, 226, 266, 361

Response: Comments noted. Details of acquisition will be developed as part of implementation.

---

119 **Comment:** The term "usable" as in "usable wild salmonid habitat" should be eliminated. The term could imply that habitat above human-made barriers is not usable, hence does not need to be considered in the attainment of the goal.

401

Response: We disagree. Use of this term has the opposite intent. If habitat is within parameters supporting salmonids above human-made barriers, it would be considered useable.

---

120 **Comment:** There tend to be conflicts between sections, for example: Many of the goals of restoration are set to achieve certain numerical standards of habitat structure, yet other goals are to achieve the restoration of natural rate.

401

Response: The level of specificity varies the level of scientific information associated with the issue. In addition, the policy is a blend of strategic and evaluative measures. For example, the use of thresholds addresses processes, sediment transport is a process, both are strategic. But percent fine sediment is evaluative, a measure of performance, a target. We recognise that streams and marine areas are dynamic and subject to natural variability, but reliance solely on processes gives one no way to detect change or to evaluate performance. In addition, using only processes can only be applied on very large contiguous landscapes with few owners (e.g., industrial forest land or state and federal forest lands). In mixed ownerships on small parcels where habitat impacts are more frequent because of a variety of competing needs (roads, timber harvest, development), we must rely more on prescriptive standards, such as buffer widths. Basin specific planning should have as its underpinnings attention to process, but one still has to have some way to evaluate results.

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121 **Comment:** Page 21 - Overall goal for habitat - The overall goal for habitat should be to increase the quantity and quality of the habitat. Maintaining habitat at its current state will not achieve the goals of the policy. An effective program to protect existing habitat and habitat forming processes, and restore degraded habitat, is the fundamental prerequisite to the maintenance and recovery of

Washington's wild salmonids. For example, some have stated that the goal of restoration is to reestablish and ecosystem's ability to maintain its function and organization without continued human intervention.

401

Response: See #123. In a perfect world where the manager has complete control, we would agree. However, in a "managed" world, complete reliance on recovery and maintenance of function is unrealistic. Given the current state of habitat condition, continued intervention is essential to protect and maintain the functions and processes essential to fish habitat (e.g. establishing minimum stream flows, correcting passage problems).

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122 **Comment:** The DEIS states "Relationships between habitat conditions and salmonid productivity have not been well defined." The DEIS and attached Appendices go to great length to discuss habitat conditions and productivity. It is assumed that productivity can be determined from habitat conditions and structure. However, we measure habitat structure as a surrogate for habitat function. The goal of habit protection and restoration is not to maintain habitat conditions within specified limits, but to protect and restore those processes that will maintain and restore salmon habitat. It can be counter productive to rely excessively upon narrative standards of habitat structure as if those standards are currently reflected in habitat conditions, or if achieved then the goal has been met and the fundamental processes could then be derailed. While structure is important, the goal should be to restore the function and processes that create the structure. Furthermore, function can be provided in some systems without the associated structure that is measured to determine habitat quality.

401, 471

Response: See #123 and #124.

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123 **Comment:** Page 48 - Introduction - the cited material are valuable references. Recent work in understanding disturbance patterns and human disturbances is critical to the salmon recovery.

271

Response: We agree. See comments #123, 124.

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124 **Comment:** Page C-5, Regarding the sub-goal to maintain or increase the quality and quantity of habitat - add a new sub-goal: "Maintain and increase the fundamental processes that control or drive system structure or function that create salmon habitat."

401

Response: We agree. Will be recommended to be added to policy.

125 **Comment:** Page C-6 - Performance measures - states "Therefore the approach will be to define performance measures by the physical conditions .... good productivity." The approach should not be to define performance measures with numeric standards as the end goal, but rather the end goal should be the restoration of natural processes which create salmonid habitat.

401

Response: We disagree. See #123, 124.

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126 **Comment:** A.1-4 Hierarchy of Protection - is inappropriate; the approaches should be site-specific and based on cost effectiveness, further; the goal of addressing all useable habitat could be unrealistic and should be addressed in the policy.

35

Response: The hierarchy is meant to apply to individual permit applications. This type of hierarchy is common policy and/or rule for permitting agencies. In fact, the hierarchy is almost always site specific, but it could be used as an approach for watershed planning. It is generally a forward-looking approach. The intent is not to punish or recoup losses from individuals who have obeyed the law as it existed at the time of their activity.

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127 **Comment:** Action Strategy A: Add the following language: "Seek full restoration or monetary compensation for habitat restoration from responsible parties for a direct loss of salmon or salmon habitat arising from land use actions or forestry practices undertaken in areas designated as high risk by watershed analysis". This would apply especially in forest practice areas that have been identified as high hazard are still subject to timber harvest or road construction as the timber company simply submits a geotechnical report stating that the forest practice will take place if certain measures are taken. Such an approach puts the risk upon the resource. If forest practices are to occur in areas mapped as high hazard and subject to prevent and avoid calls, then the company should restore all habitat injured as a result of such actions.

401

Response: Comment noted.

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128 **Comment:** A-1: Amend to read: "Protect from human impacts, all wild salmonid habitat used for migration, spawning, and rearing." Based upon our previous hearing experience, it is important to remove the term "usable" here and anywhere else in the document because it has been interpreted that salmonid presence does not constitute use.

401

Response: We disagree. See #122.

129 **Comment:** A.3 Hierarchy of Protection - threatening, needs more explanation.

159, 350

Response: See #126

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130 **Comment:** A.4. "Restore the wild salmonid habitat from its present condition up to its full productive capacity" will have major impacts (on wildlife). Could be improved by stating at the top of section: "The following are examples of actions that could be taken...."

4, 14

Response: See #55.

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131 **Comment:** Page C-7 C. -Habitat performance related to fish numbers - support.

35

Response: Comment noted.

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132 **Comment:** Page C-7 C: Replace this first sentence as follows: "Define and improve quantitative relationships between habitat forming processes and the creation and maintenance of physical habitat."

401

Response: Your comment will be considered for the final policy.

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133 **Comment:** Page C-7 D Review and update of physical indicators - support.

35

Response: Comment noted.

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134 **Comments:** E. Coordination of agency efforts - support.

35

Response: See #2.

135 **Comments:** Page C-7 E- Re: Hanford Reach, how will federal agency law and regulations coordinate with state salmonid policy to protect fall chinook?

43

Response: WDFW is currently working with the federal government to retain this reach in a protective status. We do not support any development that would affect the uplands or the stream reach. This is a very good example of the refuge concept. What better place to apply it?

---

136 **Comment:** To coordinate WSP with local government, land owners, and fish enhancement groups recommend WDFW, DOE, DNR produce a handbook on salmonid habitat enhancement and protection.

43

Response: We agree. We will consider your suggestion as an implementation action.

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137 **Comments:** Page C-**7** F - Compensation for unauthorized activities that injure salmonids
- is problematic, needs further clarification, needs revision 35, 174, 363, 365
- support it - 328

Response: See #128.

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138 **Comment:** Page C-7 - Insert a new subsection between F and G. New sentence to read to the affect: "Rigorously enforced current regulations to protect habitat."

401

Response: Comment noted.

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139 **Comment:** Page C-7 G - New Legislation (collaborative statute and rule changes) - should definitely be implemented.

146

Response: Comment noted.

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140 **Comment:** Page C-7 G - add an action strategy that recommends that a forestry representative with substantial site management experience be appointed to the Fish and Wildlife Commission.

70, 72

Response: Comment noted.

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141 **Comment:** Page C-7 G - support WDFW on Forest Practices Board.

70, 77

Response: Comment noted.

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142 **Comment:** Page C-7 G - do not support WDFW representative on Forest Practices Board.

72

Response: Comment noted.

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143 **Comment:** Page C-7 G-state standards for GMA critical areas is totally unacceptable, contrary to Alternative 3, any watershed management plan that does not provide for adequate protection, enhancement, and restoration of salmonid habitat, including best management practices for agriculture, forestry, and other land use activities should not and would not be approved by participating agencies. Watershed management plan should be an alternative and/or supplement to GMA ordinance, should be integrated with GMA.

35

Response: GMA components are included throughout the policy as a fundamental part of protecting and recovering salmonid habitat. Part of watershed planning would be to review the adequacy of existing GMA plans and ordinances to meet the goals of the policy and to integrate both.

---

144 **Comment:** Page C-7 G- what legislation is WDFW proposing for GMA?

330

Response: We are not proposing any new legislature at this time but will get involved with any remedies proposed by others, for example the integration of the shoreline management act with GMA or any legislative changes that might be proposed by the land use study commission**.**

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145 **Comment:** Page C-7 G - Policy should address both impacts on habitat.

29

Response: Comment noted.

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146 **Comment:** Page C-7 G - Some discussion needs to take place on this regarding forest practices, growth management, water allocation, and agriculture. It is stated that new forums may need to be established to accomplish this. How would the forums be set up? How would the forums establish guidelines and rules?

284

Response: See #2 and #4

---

147 **Comment:** Page C-7 G - Insert a new subsection between H and I as follows: "Develop a proactive stream retyping strategy to ensure salmonid bearing streams and water bodies are identified prior to the implementation of land use actions that will affect habitat or the fundamental processes that control or drive system structure or function that create salmon habitat."

Response: This suggestion will be considered in the actual policy.

---

148 **Comment:** Page C-7, H. Stream Typing - one size fits all stream typing is inappropriate, let each watershed develop its own based upon functional assessment of each stream reach.

35

Response: We disagree. It is also appropriate to have some form of consistent baseline definition. The specifics applied to streams in terms of protection could be reach-specific**.**

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149 **Comment:** Page C-7, H. Stream Typing - Hopefully a uniform state water type would supersede all others in this state, DNR, and timber companies.

284

Response: We agree.

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150 **Comment:** Page C-7, I. Public Access to Information - support.

35

Response: Comment noted.

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151 **Comment:** Page C-7, J. Acquisition of Key Parcels
-is a lot better than taking the same land via punitive regulations, but ownership should be local with state standards and oversight rather than state ownership/control - 35
-is interesting, especially establishing a dedicated funding source that could provide dollars to leverage protection of rapidly dwindling high quality riparian areas and marine habitat, need to partner with land trusts, etc. - 150, 271, 359
-Acquisition should be considered for all riparian areas that contain significant salmonid habitat potential, not just a few key areas - 35
-acquire the key areas - 359
-need more lands with license funds - 104
-If WDFW cannot buy or control land through easements, then so be it, its private land - 406
-Support a dedicated funding source for securing wild salmonid habitat. What possible avenues for funding would be available? How would money be divided among resident fish and anadromous fish? Eastside vs. the westside of the state? - 284
-Need to provide and estimate of expense for dedicated funding source - 361

Response: These comments will be added to #122; response is the same.

Basin Hydrology And In-stream Flow

152 **Comment:** Need to establish, monitor and control in-stream flows, water use, illegal water diversions.

7, 54, 73, 129, 166, 199, 200, 269, 351, 391, 412

Response: We agree.

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153 **Comment:** Concerned about establishing instream flows with very little or no baseline data. The IFIM method requires careful use to insure optimum flows are achievable and realistic.

158

Response: We agree.

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154 **Comment:** Development causes incorporation of streams into stormwater conveyance systems, affect streamflows.

29

Response: We agree.

---

155 **Comment:** Need to rethink our “drainage mentality” to provide for more water at low flows.

355

Response: We agree.

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156 **Comment:** Reference to "trust" water rights should be clarified - separate from normal water right certificate.

35, 271

Response: This has been corrected and clarified in Chapter V, Built Environment

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157 **Comment:** Do not have a shortage of water, need better water management, including investment in storage and delivery systems.

35

Response: See also discussion in Chapter V, Built Environment.

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158 **Comment:** -EIS attributes high runoff to forest practices, not so; in periods of record rain, natural events just as destructive, literature does not support management for thresholds, forest practices effects are inconsequential in contrast to agriculture and urban land uses.

229, 278, 330

Response: Comment noted. Suffice to say the effects of forest practices, including road building and harvest, are difficult to assess. There is considerable scientific debate and management opinion about whether this issue is something not to be ignored or rejected out-of-hand. The reader is directed to several recent discussions of this issue including DNR (1996B), FEMAT (1993), and Spence Et al (1996). Alternative 3 includes this issue as one that should be considered on a watershed-by-watershed basis. Basin hydrology will also be examined as part of the TFW Forestry Module, which is in the process of developing a regulatory package that would address recovery of wild salmonids on state and private timberlands.

---

159 **Comment:** Better incentives for water conservation.

349

Response: We agree. Incentive packages should be developed as a part of watershed planning.

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160 **Comment:** Concerned about small hobby ponds affecting stream flows.

252

Response: We agree. Small ponds can alos affect stream temperature, turbidity, and fish passage.

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161 **Comment:** Need to repeal 5000 gpm groundwater well water right exemption and practice of "six-packing" homes to avoid the need to obtain a water right.

269

Response: We would support an adequate review and solution to this issue.

---

162 **Comment:** Policy indicates water rights are to be altered. To alter a water right of any kind without due process, legislation and compensation, is illegal in this state and unconstitutional everywhere.

275, 365

Response: Comment noted. WDFW will respect the legal standing of water rights.

---

163 **Comment:** Fishing is always better after a flood.

201

Response: Comment noted.

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164 **Comment:** Need to control high flood flows, sedimentation.

223, 355, 384

Response: We agree.

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165 **Comment:** Concern about running water onto land to recharge aquifers, should not allow, results in warmer water to groundwater and more pollutants to groundwater.

349

Response: We agree. Policy intent is to avoid land uses that disrupt natural recharge (e.g., impervious surfaces).

---

166 **Comment:** The carrying capacity of streams has been reduced due to human degradation of habitat.

333

Response: We agree.

---

167 **Comment:** Needs to include standards for flow down ramping.

359

Response: The policy will address flow release management.

---

168 **Comment:** Need surcharge fee on impermeable surfaces.

384

Response: Comment noted.

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169 **Comment:** Page 21 - The goal for basin hydrology would be better served incorporating stream flows for ecosystem functions rather than emphasizing salmonid spawning, incubation, rearing, adult residency and migration. We support the inclusion of flows needed for channel forming and maintenance and for estuarine and marine habitats, but we note that adequate discharges also needed for riparian upland zones and value maintenance to retain the linkage among stream, flood plain riparian, and upland zones in watershed geography. These flows often exceed the instream needs for various salmonid life history stages. We believe the historical record provides a better framework for instream flow and habitat needs than do specific life history stages for the important management species.

320

Response: We agree. This goal may be revised in our draft policy recommendation to the Fish and Wildlife Commission.

---

170 **Comment:** Page 21 - Goal refers to the needs of marine habitats, this needs more explanation, compared to freshwater stream habitats, water withdrawals would generally have less impact on estuarine and marine habitats because of predominant tidal influences. Diking, dredging, and filling have far greater adverse impacts on estuarine and marine habitats than water withdrawals.

271

Response: The typical watershed plan tends to omit marine habitat. This goal promotes the "continuum: relationship between freshwater processes and marine areas. Freshwater flowing into

estuaries is essential to maintaining transition habitat. We agree this issue may not be the most significant but chose not to ignore the relationship.

---

171 **Comment:** Page 21 - There is a conflict between pages 21 and 22. The DEIS on page C-11 states "The policy will recognize that attainment of natural basin hydrology will be difficult in many cases and probably impossible in some urban areas." However there is no recognition of this issue in either the subgoals or the action strategies. The FEIS and the policy should be updated accordingly. Furthermore, the existing subgoals should be strengthened toward the goal of preservation of natural flow regimes in terms of timing, duration, and quantity, especially on streams that are already heavily regulated. Natural hydrology is also impossible in basins where surface and groundwater is heavily diverted for water to supply our hydropower for example, within reaches in the Green, White and Lake Washington basin. Storage reservoirs have further altered natural flow regimes, frequently to the detriment of wild fish life history needs. It should be recognized that without the natural basin hydrology, for example reduced stream flow due to water diversion, the productivity for wild salmon is seriously diminished and the chances for successful habitat restoration is reduced. The urban situation with regard to impervious surface and chronic storm scour is but one example. The basin hydrology goal should also be expanded to consider the impact of elevated stream velocities, but below peak flows directly upon juvenile salmonids. For example, in urbanizing basins with increasing amounts of impervious surfaces, there is an increasing peak runoff in stream flows even with storm water facilities there is an increase in the effective frequency of flows generating stream velocities less than those affecting the channel but greater than those suitable for over-wintering juvenile salmon. The emphasis in this document upon peak flows assumes that peak flows are damaging, which is generally true, but ignores the probability that habitat damage may occur at flows well below peak and that direct impact to juvenile salmon over-wintering given the dearth of over-wintering habitat in many systems, will occur at flow events smaller than the one you're flooded at.

401

Response: We agree with your comments, except that the EIS does address rain-on-snow effects. See revised text in Chapter V.

---

172 **Comment:** Page 50 - Basin hydrology and instream flow conditions will likely worsen outside of urban growth areas because there will be additional development. Much of which would include exempt wells.

401

Response: See #161. The policy also encourages compact UGAs and retention of forest and agricultural lands, and large lot zoning for rural residences.

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173 **Comment:** Page 50 -The DEIS discusses the analysis of existing riparian rules for state and private timber lands. The statements made this section lead the reader to think that current regulation of timber harvest, including watershed analysis, fails to protect salmonid habitat. As

watershed analysis is typically prescribing buffer widths and the range of the interim buffers proposed in the WSP, the state is indirectly stating that the interim buffers are insufficient.

401

Response: What we meant was the minimum standards for forest practices riparian buffers are inadequate. We support watershed analysis as a process, and while it may have its shortcomings, it provides site-specific evaluation. Properly applied, it can provide adequate protection . See also #38, #58, and #62.

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174 **Comment:** Page 50 - The DEIS state "Protection measures have not proven to be entirely successful at attenuating deep flows." Though the tribal fisheries department supports this statement, the statement should be supported by a reference. Furthermore, the concentration upon peak flows tends to overlook injuries to salmonids and salmonid habitat that may occur well below peak flows due to the interaction of the loss of instream complexity with increased flows. Additionally, by concentrating upon peak flows a false sense of security arises when peak flows are reduced because it is assumed the problem is then reduced. However, if the two year storm event generates flows to cause scour to the egg pocket, then reducing the magnitude of five or ten year flows will be of little value because the damage will be done.

401

Response: We did not intend to concentrate on peak flows per se. The policy intent is to reduce or eliminate human caused changes in flows that cause damaging scour.

---

175 **Comment:** Page 50 - The DEIS states "Restoration of suitable hydrologic conditions for salmonids in urban streams is problematic ..." This statement is particularly true if one is attempting to restore a spawning stream. However, juvenile salmonids move great distances from spawning habitat to summer rearing habitat to winter habitat. Muckleshoot Indian Tribe surveys have found that the low gradient (less than ½ percent), lowland tributaries, and urban and urbanizing tributaries in mainstem rivers contain high numbers of over-wintering juvenile coho. Furthermore, these coho are significantly larger than the compatriots from higher gradient streams found in more pristine areas. Though little large woody debris is found in these lowland streams, these streams often contain a large volume of slow moving water due to backwater from the mainstem rivers and the low gradient which provides the hydrologic functions required by the over-wintering juvenile salmonids. The tribal findings are indicative of the problems that could arise when numerical standards are applied rather than habitat functions. At minimum cost, the over-wintering value of these streams could be readily increased. The value of over-wintering habitat has received increasing consideration in the protection of salmonid habitat. Numerous studies have suggested a lack of over-wintering habitat as a population limiting factor for coho, chinook, and steelhead. The search for suitable over-wintering habitat may lead some juveniles to migrate in excess of 30 kilometers from summer rearing areas to over-wintering areas, and that disproportionately large numbers of juvenile salmon may over-winter in these areas. Though typically winter growth rates are lower than summer growth rates, winter growth rates can be considerably greater for fish over-wintering off the main channel areas than for those over-wintering in mainstem areas with large size at outmigration increasing survival upon ocean entry.

Many juvenile salmonids will move downstream in search of over-wintering into areas the DEIS states restoration of suitable hydrologic conditions is problematic. Though the problem statement may be true for restoring hydrology to the stream as whole, restoration of over-wintering function in the low gradient section subject to backwater from the mainstems is readily achievable. Other studies have shown that many juvenile coho salmon migrate downriver during the fall in search of over-wintering habitat. Thus the true value of lowland streams may not be in their contribution to overall basin fry production, but their contribution to the overall availability over-wintering habitat. If this over-wintering habitat is not restored, then the prospects for coho restoration are not good. Furthermore, the statement in the DEIS could be used as justification to avoid restoring critical lowland over-wintering habitat. If critical over-wintering habitat cannot be restored, then the DEIS should state how harvest will be maintained in those systems lacking this habitat.

401

Response: The policy intent to protect habitat used at any point in a salmonid's life history. Protection of overwinter habitat is essential.

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176 **Comment:** Page C-1 - Water quantity is affected by both withdrawal of water directly from the streams and withdrawal of ground water hydrologically connected to the streams.

271

Response: We agree. The FEIS addresses this.

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177 **Comment:** Page C-9 - States "Instream flow is such an influential factor that predictions for wild coho in Puget Sound are based largely on summer low flow conditions that existed when the wild coho were residing in freshwater." The coho escapement goals were set in 1997, however, there has been considerable change in the amount of summer rearing habitat due to declining flows, placing of streams into pipes, and channelization especially in the urban and urbanizing areas. For example, the SASSI report lists declining flows in Newaukum Creek as a problem for coho. Given the increase in storm water disturbance to spawning and rearing streams, more effort should be devoted to determining limiting factors in both natural and urban basins.

401

Response: We agree.

---

178 **Comment:** Page C-10 - States "Changing hydrology which is usually coupled with .... can severely reduce the potential of urbanized streams to produce salmonids." This statement assumes that habitat structure equals function. Muckleshoot Fisheries Department data suggests that it is important to evaluate and urban and urbanizing streams for their ability to provide functional habitat for the various life stages and species of salmonids.

Response: We stand by our statement. Both physical structure and watershed processes are substantially affected by urbanization. These impacts affect the liability of hatchery production as well; perhaps even more. Issaquah hatchery is a case in point.

---

179 **Comment:** Page C-11 - DEIS fails to consider the relationship between basin hydrology and habitat complexity in the formation of over-wintering habitat for juvenile salmonids. Land use can have a significant affect on basin hydrology. For example, urbanizing basins increase the amount of impervious surface thereby increasing peak runoff in stream flows, and increasing the effective frequency of flows, generating stream velocities less than those affecting the channel, but greater than those suitable for over-wintering juvenile salmon restricting groundwater recharge and restricting summer low flows. Certain forest practices can alter peak runoff especially where timber harvest occurs in transient rain-on-snow zones, and around and past removal of large woody debris from streams has led to increased water velocities and decreased areas of refuge from water velocities exceeding salmon use thresholds, thus magnifying the impacts of the increased discharge of water. The DEIS also fails to consider long term movements of fish. If they are migrating downriver in search of habitat, then we must provide the habitat for the wild fish or adopt an urban policy.

401

Response: See #175.

---

180 **Comment:** Page C-11 - The last sentence states that stream flows affected by the withdrawal of ground water hydrologically connected to the surface water, but does not provide much detail. It would be worth mentioning that ground water in particular, often provides a major component of flow during summer months critical to fish and that reducing this flow through ground water pumping can lead to higher stream temperatures as ground water provides cool water to streams.

271

Response: This suggestion was added to the text of the FEIS.

---

181 **Comment:** Page C-12 - Performance Measures - Add a new paragraph 4 to read: "No increases in the number or duration of flows exceeding those acceptable for juvenile salmonid over-wintering."

401

Response: This suggestion will be considered in actual policy drafting.

---

182 **Comment:** B.2 - Retaining forest, agricultural and large lot rural residential parcels -says to provide incentives to retain forest lands, but riparian buffers strong disincentive to stay in forestry; forces sale and conversion to more intense land use.

23

Response: Comment noted. The challenge is to improve forest practices without forcing conversion.

---

183 **Comment:** B.2 - Simply a restatement of GMA requirements with respect to critical areas and resource lands and is duplicative and overlapping.

Response: See #144.

---

184 **Comment:** B.3 Impervious Surface Thresholds - The DEIS proposes a statewide storm water management program and suggests that when basins reach a threshold of 10% impervious surfaces, responsible officials should develop mechanisms that limit the total effective impervious surfaces. However, the Growth Management Act suggest density goals that would generally increase impervious surfaces. Moreover, the state's storm water management programs controls and treats runoff by use as specific performance standards and BMPs but leaves essential land use decisions to local government. King County has taken steps to control impervious surfaces, but these curbs result in around 35% impervious, not 10%. Where effective storm water management is crucial, WDFW needs to be a close partner and support use of ecology storm water manual and divert resources to a joint agency effort to rewrite the manual as needed to better meet the goals of the Wild Salmonid Policy.

35, 271, 405

Response: The point of managing to avoid thresholds is to use zoning fundamentally to avoid increasing impervious surface and to infill those areas already above thresholds. The best form of mitigation is avoidance. The current mentality of reliance on engineered reduction of impacts has not adequately protected instream biota. See proceeding and following comments on this issue.

---

185 **Comment:** B.3 Impervious Surface Thresholds - Amend paragraph to read: "Develop mechanisms .... habitat quantity, *juvenile salmonids* and salmon diversity. In watershed basins currently ... runoff. These efforts should be coordinated with the development and implementation of a statewide storm water management strategy, *and the avoidance of storm water impacts upon salmonids that manifest at smaller discharge event than does damage to channel"*
Response: These suggestions will be considered in the actual policy.

---

186 **Comment:** B.3 Impervious Surface Thresholds - Add a new Paragraph between B-3 and B-4 as follows: "Develop mechanisms that limit increases in the duration or frequency of flow events in a watershed sub-basin to or below a threshold that juvenile salmonids that use for over-wintering habitat and watershed sub-basins currently exceeding this threshold increase habitat complexity to provide areas of low velocity for juvenile salmon to utilize as over-wintering and high flow refugia habitat."

401

Response: These suggestions will be considered in the actual policy.

---

187 **Comment:** Page C-13, B.4 Water Resource Integration with GMA - contradicts B.2. or would, if implemented, replace B.2.

35

Response: See #144.

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188 **Comment:** Page C-13, C-4 Amend to read: "Forest harvest planning should include harvest scheduling .... rain-on-snow events, reduction in large woody debris recruitment, increases in the duration of flows above those suitable for juvenile salmonid over-wintering and other hydrologic effects. Forest road densities should be limited to thresholds which avoid damaging changes in stream hydrology and direct impacts to rearing salmonids."

401

Response: Comment noted. See also #38.

---

189 **Comment:** Page C-13, D. Establish and Maintain Minimum Streamflows - Should be revised, minimum flows difficult to establish, may not be the most important habitat parameter, let the fish tell us not some computer model.

35

Response: Comment noted.

---

190 **Comment:** Page C-13, E. Stored Release and Interbasin Transfers - Should be revised, minimum flows difficult to establish, may not be the most important habitat parameter, let the fish tell us not some computer model.

35

Response: Comment noted.

---

191 **Comment:** Page C-13 - Questions efficacy of interbasin transfers - contradicts intent of section.

361

Response: The policy does not support interbasin transfers.

192 **Comment:** Page C-13, F. Hydraulic Continuity, Exempt Wells - Should be revised, minimum flows difficult to establish, may not be the most important habitat parameter, let the fish tell us not some computer model.

35

Response: Comment noted.

---

193 **Comment:** Page C-13, H. Enforcement Where Voluntary Flow Measures Not Effective - Should be revised, minimum flows difficult to establish, may not be the most important habitat parameter, let the fish tell us not some computer model.

35

Response: Comment noted.

---

194 **Comment:** Page C-13, I. Integration of Flood Control With Fish Habitat - excellent.

35

Response: Comment noted.

Water Quality and Sediment Quality, Delivery and Transport

195 **Comment:** Concern that promoting "natural" rates of erosion is counterproductive - must manage to avoid sedimentation.

4

Response: We disagree. Erosion has positive as well as negative benefits (e.g., cover from undercut banks, source of spawning gravel, input of LWD are positive benefits).

---

196 **Comment:** Water Quality action strategies should include sub-basin analysis to determine the relative contribution to the water quality problem due to human or natural factors; if natural factors predominate don't impose strict requirements on human activities.

35

Response: Comment noted.

---

197 **Comments:**

-Mining should not be allowed to deplete fish habitat
-Miners should never be allowed to use metallic sulfide mining under any circumstances
-Miners should never use "local agreement" clauses in any contract
-Miners should pay fair market value for minerals
-Miners should not be able to assign contracts to avoid cleanup of toxics from abandoned mines

81

Response: Comments noted.

---

198 **Comment:** Need much greater restriction on use of herbicides, concern about effects on fish and insects.

143

Response: We agree.

---

199 **Comment:** In general agreement with using the State Water Quality Standards for performance standards. However temperature models are suspect in some watersheds, particularly eastern Washington.

158

Response: Models are not without their faults. The challenge is to continue to improve or develop modeling.

---

200 **Comment:** WDFW concerned about water temperature, yet opposes a small effort to place wild fish above the lower Elwha River dam where they could spawn in colder water.

294

Response: This issue is the focus of an entire DEIS on dam removal. The major problem is downstream passage of juveniles.

---

201 **Comment:** Predicting upland erosion and the resultant sediment delivery to streams has not been perfected to date, the fine sediment standard of less than 0.85 mm does not address watershed with granitic type soils.

158

Response: We agree but stand by the performance measure unless improved at the local level.

---

202 **Comment:** WDFW is concerned about flood borne silt and its damage to spawning, yet advocates removal of the Elwha dams which would dump some 17 million cubic yards of material into the river.

294

Response: See #199.

---

203 **Comment:** Fields are all fenced to keep livestock from streams, fecal coliform counts have been higher upstream of farm than below.

176

Response: Thank you for your stewardship efforts**.**

---

204 **Comment:** Fish farming pollutes salmonid bearing waters and releases genetically inferior and exotic salmonids that compete with and dilute the genes of wild stocks; WSP needs to address the impacts of fish farming.

220, 241, 269, 280, 315, 328

Response: Fish farming would be included within the water quality component and in fish management - ecological interactions.

---

205 **Comment:** Need to initiate a toxics monitoring program, become more proactive in this issue.

270

Response: We agree, provided it was a well-funded complete program, not piece-meal.

---

206 **Comment:** Need to work to reduce the impacts of stormwater in urbanized watersheds.

131

Response: We agree. Also, need to avoid increases through land use planning.

---

207 **Comment:** Need to work to improve water quality (e.g., TMDL 303d lists - Clean Water Act).

131

Response: We agree.

---

208 **Comment:** Need to enforce water quality laws, especially agriculture water quality.

166

Response: We agree.

---

209 **Comment:** Must control mining effluent.

93

Response: We agree.

---

210 **Comment:** Prohibit Wash. Dept. Transportation from use of herbicides, other toxins.

121

Response: Comment noted.

---

211 **Comment:** Concern about septic tank effluent enrichment of streams.

58

Response: We share your concern.

---

212 **Comment:** Concern about stream temperature.

58

Response: We agree.

---

213 **Comment:** Concerned about abundance of, changing aquatic vertebrate assemblages.

58, 212

Response: We agree.

---

214 **Comment:** Environmental effect of reduced spawners is less flushing of fines from streambed during spawning.

359

Response: We agree.

---

215 **Comment:** Require legislation/rules to:

-Control stream siltation - 244
-Control phosphates - 244
-Provide higher water quality, control nonpoint pollution, pesticide controls - 199, 251
-Control bank erosion from agricultural, other lands - 200, 201
-DOT should have a "no-sand" policy for watersheds containing salmon - 391

Response: Comment noted.

Page Specific Comments

216 **Comment:** Page 1 - The policy states "that over 600 water bodies are listed in the EPA 303D List as impaired or threatened compared to the Clean Water Act". This is incorrect. It is the Department of Ecology that proposes the 303D List. EPA just approves or creates its own list. The water bodies are compared to the state's water quality standards that are adopted in part to demonstrate compliance with the Clean Water Act. The Clean Water Act does not contain such standards per se.

401

Response: The text changed was to reflect this comment.

---

217 **Comment:** Page 23, A. "One of the goals for water quality and sediment is to manage watershed streams ..... to within the limits of salmonid life requirements." Amend this wording as following: "Manage watersheds, stream channels, wetlands, and marine areas such that rates of sediment, erosion deposition, and routing approach those expected under natural condition."
The term "within the limits of salmonid life requirements" has many interpretations, such as at the edge of tolerance. The goal should not be towards managing toward narrative standards of life history requirements, due to synergistic impacts of the want of one habitat variable upon another, but towards restoring the natural processes and disturbance regime such as the goal for basin hydrology, which is to maintain and restore the physical processes affecting the natural basin hydrology. The goal of maintaining and restoring natural processes should be the goal, rather than restoring to within some narrative standard of measurable habitat.

401

Response: This language will be considered in the policy drafting

---

218 **Comment:** Page 23, D. Performance Measure for Sediment Concentrations - Because habitat in some watersheds has been degraded for so long, natural levels are unknown.

284, DFC 93

Response: Comment noted.

---

219 **Comment:** Page 23, D. Performance Measure for Sediment Concentrations - It is important to note that in addition to fines and paring spawning gravel, streambed scour is also an impairment and can be a major cause in declining populations. For example, in the major chinook spawning tributary in the Green River basin, over 371 chinook redds in a reach of approximately of 2,000 were lost due to scour exceeding 12 inches depth. This represents a substantial part of the Green River chinook run. As land use practices can alter the duration, frequency, or magnitude of scouring flows, an additional performance standard should be included as follows: "Gravel will be considered impaired in spawning areas if the frequency or depth of scour exceeds the natural disturbance rate and magnitude."

401

Response: This language will be considered in the policy drafting

---

220 **Comment:** Page 51 - The DEIS states "A predictable pattern of bank hardening, channel dredging, ..." All factors listed in this sentence except wetland drainage can be controlled by the existing power of the Hydraulic Code. This sentence is an admission that much of the problem is not lack of regulations, but lack of enforcement of current regulation.

401

Response: While the HPA can be used to condition or deny in-stream work, the point is that the HPA is reactive to land use. Once the land use pattern is set, it becomes exceedingly difficult to maintain habitat even with denials, since the HPA does not govern up-slope cumulative impacts to flows, sediment, and riparian areas, nor does it govern water withdrawals.

---

221 **Comment:** Page C-14, second paragraph - This paragraph deals with the importance of water temperature as a regulator in the aquatic environment. It would also be worth mentioning here that ground water is often the major component of flow during summer months, and that reducing this component of flow leads to higher stream temperatures.

271

Response: Text was added.

---

222 **Comment:** Page C-14, fourth paragraph - Berman and Quinn (1991) were cited as having demonstrated that spring chinook fecundity and egg viability is is reduced above 54 degrees F. That figure seems a bit low and a bit too precise. Did the authros really show this?

471

Response: The text was edited.

---

223 **Comment:** Page C-14 - This section should say something about juvenile rearing requirements.

471

Response: The text was edited.

---

224 **Comment:** Page C-16, Subgoal B - The term "to within limits of salmonid life requirements" allows for a considerable range of managed and deliberate adverse impacts. Amend to read: "Manage watersheds, stream channels, wetlands, and marine areas such that rates of sediment, erosion deposition, and routing approach those expected under natural conditions."

401

Response: This language will be considered in the policy drafting.

---

225 **Comment:** Page C-16, D - Add a sentence: "Gravel will be considered impaired in spawning areas if the frequency or depth of scour exceeds the natural disturbance rate and magnitude."

401

Response: This language will be considered in the policy drafting.

---

226 **Comment:** Page C-17, C - Amend paragraph to read: "Develop and implement a storm water management strategy ... significant changes in basin hydrology" (new language) "at flow levels affecting salmon rearing, spawning and migration".... and non-point source pollution."

401

Response: This language will be considered in the policy drafting.

---

227 **Comment:** Page C-17, G.1 - Watershed Analysis - Many tribes have expressed concerns about the use of watershed analysis for a process for which it was not designed. Watershed analysis should not be considered if its a panacea for habitat issues. It is simply a tool.

401

Response: See #38 and #62.

---

228 **Comment:** Page C-17, J. (Land Use) and L (Sediment control measures) - Where land use actions, such as forest practices take place in areas deemed high hazard, then an action strategy that might be to allow forest harvest or road construction to occur, but if the harvest or road construction leads to slope failure that damages reserved treaty resources or the habitat they depend upon, then the landowner should be held liable for all costs associated with restoring the injured habitat to the structure and function it provided prior to injury.

401

Response: Comment noted.

---

229 **Comment:** Page C-17, M - Amend to read: "Manage watersheds to ensure that gravel removal and sediment delivery to streams mimics the anthropogenic regime."

401

Response: Comment noted.

---

230 **Comment:** Page C-17, N - Amend to read: "Require spawning gravel supplementation to mitigate spawning gravel supply depletion."

401

Response: This language will be considered in policy drafting.

---

231 **Comment:** Page C-18, O - Amend to read: "Ensure gravel removal and dredging operations are evaluated and conducted in a manner that protects incubating salmon eggs, salmonid habitat, including instream riparian wetland and marine resources."

401

Response: This language will be considered in policy drafting.

---

232 **Comment:** Page C-18 - Table of per cent pools - figures in table are reversed.

471

Response: Table was corrected.

Stream Channel Complexity

233 **Comment:** Concerned that allowing "natural meander patterns" is counterproductive - should manage sediment traps to avoid channel shifting, better than dredging entire reaches.

4

Response: We disagree with the first point. On the second point, sediment trap management has not been well evaluated and should be used with extreme caution, as should dredging entire reaches; both deal with symptoms, not processes.

---

234 **Comment:** Concerned about irrigators using a creek as a ditch, "gutting" it for conveyance of irrigation water with WDFW approval.

27

Response: Comment noted.

---

235 **Comment:** Concern that streams are congested from blowdown and that fish passage is impaired.

130

Response: In most situations, blowdown does not appreciably restrict fish passage; in some cases, it may enhance passage.

---

236 **Comment:** Policy should identify that some channelized stream reaches are not practical or realistic candidates for restoration to completely natural state, strive productive habitat.

35

Response: The DEIS does; the policy could include this point

---

237 **Comment:** Concern about the performance standards for channel stability, pool frequency, large woody debris and side channels; the literature and research used to develop these standards came from forested watersheds in higher elevation and precipitation areas. Imposing these same standards on lower elevation alluvial river bottoms that have been heavily impacted by urban development is not good science.

158

Response: We disagree, particularly for converted forestlands, but see #235.

---

238 **Comment:** Need to maintain drainage, have been thwarted by WDFW.

176

Response: Comment noted.

---

239 **Comment:** Fisheries Department required us to remove all large woody debris from these same streams, probably negating whatever benefits buffers provide.

72

Response: This has not been agency practice or requirement since the mid-seventies. Standard provisions for HPAs required avoiding felling into streams and cleaning out only the debris resulting from the operation, without disturbing existing LWD.

---

240 **Comment:** Drop words habitat and restoration and substitute "stream maintenance" - lack of in-stream maintenance with equipment is reason for flood damages, fewer fish returning.

201

Response: We disagree.

---

241 **Comment:** Page 23, Goal for Stream Channel Complexity - The DEIS states "Maintain and restore .... connectivity and function." Amend to read: "Maintain and restore the natural disturbance and input regime to stream channels so the characteristics for channel sinuosity, gravel quality and quantity, instream cover, large woody debris, pool depth and frequency, bank stability, water velocity, and side channel and off channel and flood plain connectivity and function is maintained and restored."

401

Response: This language will be considered in policy drafting.

---

242 **Comment:** Page 23, A-D Performance Standards for Channel Complexity - These performance measures are relatively general. This may need to be discussed at the implementation, prescription level.

284

Response: Watershed planning and/or site-specific treatment that meets the intent of the section is encouraged.

---

243 **Comment:** Page 23, A. Performance Standard - The DEIS states "Spawning gravel .... salmonid species in the basin." Amend to read: "Spawning gravel will be relatively stable with the potential for the frequency and intensity of scour resembling that in the natural condition throughout the nest building .... period of the wild salmonid species in the basin."

401

Response: This language will be considered in policy drafting.

---

244 **Comment:** Page 23, D.1 Performance Standard for LWD - The DEIS states "Quantity and quality of large woody debris in streams should not be impaired by human activities." Amend to read: "The quantity and quality of large woody debris in streams, and the potential for future recruitment should not be impaired by human activity." Protecting existing large woody debris in streams is a short-sighted policy if in the future large woody debris is impaired.

Response: Source is addressed in the riparian component.

---

245 **Comment:** Page 24, E - Side Channels and Dikes - Amend to read: "Side channels and other off channel habitat including wetlands should remain connected to and passable by salmonids to and from the channel proper. For feasible flood plains constricted by dikes or levies are removed or modified to allow flood flow storage and release. New bank protection measures that are detrimental habitat will be prohibited."

Response: This language will be considered in policy drafting.

---

246 **Comment:** Page 51 - Impacts to channel complexity - The DEIS states "Riparian areas near most ....." Again, many of the factors listed in this sentence can be controlled by the existing power of the Hydraulic Code. This sentence is an admission that much of the problem is not lack of regulations, but lack of enforcement of current regulations.

401

Response: See #69 and #219.

---

247 **Comment:** Page C-18 - Stream Complexity - the DEIS states "Salmonids have evolved...", amend to read "Salmonids have evolved and adapted to a stream's natural disturbance that provides for a variety of in-channel features."

401

Response: Comment noted.

---

248 **Comment:** Page C-19 - Regarding McDade, 1994 - This citation is not listed in the bibliography. If this article is McDade, et. al., 1990 that is listed in the bibliography, then it should be noted that with respect to the statement that "most large woody debris comes from trees within 45 meters of the stream or wetland" is that McDade could not account for approximately 40 percent of the large woody debris. Additionally McDade's work is for first through third order streams and does not include wood recruitment from landslides, nor flooding, nor channel migrations in large rivers.

Hence the statement that most large woody debris comes from within 45 meters of the stream is a gross oversimplification and can be used to deride upstream recruitment.

401

Response: The text was edited.

---

249 **Comment:** Pages C-21 and C-22, D Performance Measures for Channel Characteristics - Are merely proscriptive regulations.

35

Response: Comment noted.

---

250 **Comment:** Pages C-21 and C-22, E C-22 (side channel and flood plain connectivity) support.

35

Response: Comment noted.

---

251 **Comment:** Can provide LWD as part of harvest operation.

128

Response: Comment noted.

---

252 **Comment:** Opposed to placement of LWD where it would affect recreational boating.

348

Response: Comment noted.

Riparian Areas and Wetlands

253 **Comment:** Riparian area performance standards give the impression the buffers are mandatory; this goes beyond the scope of a traditional WDFW policy unless WDFW has adopted a policy within Priority Habitats and Species.

232

Response: Comment noted.

---

254 **Comment:** Riparian area performance measures should state that they do not purport to fully protect all wildlife, as the PHS Riparian chapter does.

232

Response: Text was edited as such.

---

255 **Comment:** Need to restore continuous riparian buffers along all streams.

355

Response: We agree.

---

256 **Comment:** Terminology too complex , e.g., "Plant community structural complexity (understory herbaceous and woody overstory canopy) will approximate site potential for native plant species" could be restated "Restoration will achieve the maximum level of plant community structural complexity that the given site will allow under ideal conditions."

35

Response: Comment noted.

---

257 **Comment:** Concern that riparian standard is solely based on forest land, whatever the standard becomes, it must be flexible and adaptable to individual watersheds.

158

Response: Comment noted.

---

258 **Comment:** There is a lack of scientific evidence to support wide buffer strips, not justified, especially on small, non-fish-bearing streams.

41, 69, 85, 128, 141, 145, 147, 148, 168, 357, 365, 376, 413

Response: See #38, #58, and #62

---

259 **Comment:** Our forests are dynamic, not static; we have the skill and ability to manage our riparian zones for both ecological and economical values.

147

Response: Comment noted.

---

260 **Comment:** Buffer zone requirements need to be a function of a watercourses propensity to change course and the propensity of shorelines, slides, and erosion as well as the different types of fish populations that use the water course and their habitat needs.

340

Response: Our recommendations encompass these points.

---

261 **Comment:** Should remove buffers from all alternatives.

350

Response: Comment noted.

---

262 **Comment:** Major conflict of WSP is with waterfowl; wooded buffers along streams and wetlands in certain areas will degrade/destroy waterfowl habitat.

4

Response: Comment noted.

---

263 **Comment:** Need regulations to protect, stop filling of freshwater and estuarine wetlands.

54, 328

Response: Comment noted.

---

264 **Comment:** Buffers blow down and cause fish passage problems, erosion, and siltation.

41, 130, 144

Response: Comment noted.

---

265 **Comment:** Buffer requirements will result in additional roads with sediment and fish passage problems.

96, 147, 365

Response: We agree. This can be a valid concern in some instances.

---

266 **Comment:** Page 24, A1 - recommended buffer width(s) is an ideal width beyond which benefits level off, can be displayed graphically, wildlife are the chief beneficiaries of the wider buffers, narrower buffers provide shade and bank stability with less farming restriction, need to develop buffers based on site characteristics.

107

Response: We agree in part. Our recommendations incorporate all riparian functions.

---

267 **Comment:** Page 24, A1 - Watershed Analysis - In addition to the typical factors considered in watershed analysis, the factors limiting the maintenance and restoration of habitat should be considered.

401

Response: We agree.

---

268 **Comment:** Page 24, A1 - The riparian standards regarding limited numeric buffer widths is insufficient. Amend to read: "Allow natural rates of erosion and transport of sediments, nutrients, and large woody debris that affect habitat quality in riparian areas." This would make the freshwater riparian standards consistent with the marine and estuarine standards on Pg. 26.

Response: This language will be considered in policy drafting.

---

269 **Comment:** Page 24, A1.a - The riparian standards for water types 1 through 3 should be amended to read as follows: "For water types 1 to 3 as defined and mapped in WAC 222-160-030, a buffer of 100 to 150 feet measured horizontally, the height of a cite potential tree in a mature conifer stand 250 years, the average height of the dominant standing trees, the average height of the fallen dominant trees, whichever is greater on each side of the streams channel migration zone or channel disturbance zone whichever is greater." The proposed standards by the state will be taken by

industry as a maximum and any modification will be typically inward rather than outward. Data collected by the tribe in the White River gives an average standing tree height for the dominant trees of 206 feet. The height of fallen trees at which the stem had tapered to one feet in diameter often exceeded 200 feet. Data introduced into the mid and White/Clearwater watershed analysis by Weyerhaueser for standing trees placed the average height at which the stem had tapered to one foot at approximately 160 feet. It is clear that relying upon a default of 100 to 150 feet, or tree height at 100 years, significantly underestimates the widths of forests which directly influences the stream and riparian habitat.

401

Response: We selected tree height at maturity (100 yrs.) as representative of potentials across a variety of landscaped and land uses.

---

270 **Comment:** Page 24, A1.d - Regarding the statement for streams not administered directly or indirectly through WAC 222-26-030, the logic behind this statement is unclear. It appears the changes of regulatory venue drive the standards deemed necessary to protect habitat. It is a simple matter to determine which streams not under state jurisdiction meet the statutory definitions of the various stream types and then recommend that the applicable buffer widths apply.

401

Response: Comment noted. See also #148 and #149.

---

271 **Comment:** Page 24, A1.e - The DEIS states "The buffer may need to be expanded to ....". Amend to read: "The buffers will need to be expanded to accommodate anticipated channel migration, channel disturbances due to degree torrents as an additional buffer against wind throw to increase large woody debris recruitment to channels with a poor standard of large woody debris, or to address upslope instability or previous negative upslope impacts." This is necessary to insure that this protection is not optional.

401

Response: Comment noted.

---

272 **Comment:** Page 24, A1.e - The DEIS states "To the extent possible, buffers should be continuous along the stream channel." Add the following sentence: "Where possible, restore natural growth pattern, structure, and tree height and diameter."

401

Response: Restoration is included in this section.

---

273 **Comment:** Page 24, A1.f - Tree removal would occur only to improve the functional characteristics of the riparian area, or for road alignment, stream crossings, or other corridors where no feasible alternative exists. Who determines what is feasible?

284

Response: This varies, but generally it would be a site-specific regulatory or planning decision.

---

274 **Comment:** Page 24, A1.f - It is unclear if this sentence means that harvest will not occur within the buffers unless it meets the standard of improving the functional characteristics. To avoid controversy over what constitutes a functional improvement of a buffer, a definition is required. Otherwise this paragraph will have no utility.

401

Response: We disagree. See revised text in Chapter III.

---

275 **Comment:** Page 24, A1.f - Add "For a construction, reconstruction, or upgrades are unavoidable, minimize encroachments in buffer areas and mitigate for adverse impacts. Buffer averaging shall not be permitted to meet riparian buffer requirements."

401

Response: Comment noted.

---

276 **Comment:** Page 24, A1.h - States grazing will be managed to maintain to allow reestablishment of functional riparian vegetation. It should be noted that during field studies for the Snohomish estuary wetland integration plan, some level of grazing appeared to keep dominance of reed canary grass at a minimum allowing for greater diversity of wetland plant species to become established. In appropriate situations, grazing could be used as a management tool for reed canary grass control.

271

Response: Comment noted.

---

277 **Comment:** Page 24, A1.i - Cross references to other performance standards (Basin Hydrology, etc) - It must be recognized that existing modules upon which these performance standards could be based do not analyze all probable and significant impacts to salmon, salmon habitat, and the processes creating salmon habitat. For example, the current basin hydrology model in WAC 222-22 does not consider the impacts to salmon such as increased frequencies or durations of flows exceeding those in which juvenile salmon can over-winter.

401

Response: These considerations are not limited to watershed analysis in WAC 222-22 and are not limited to forest land riparian buffers.

---

278 **Comment:** Page 49 - Mentions wetlands but does not address protecting these critical salmon spawning habitats, section mentions agricultural effects on wetlands but not forest practices or mitigation measures, most wetland destroying activities are not covered by wetland permits, therefore state must strengthen our wetland permitting process and enforce it.

43, 355

Response: Wetlands protection applies to all land uses.

---

279 **Comment:** Page C-25, A1.f - Riparian Area Buffers - restate "Tree removal would only occur the improve the functional characteristics of the riparian area, reduce erosion potential, or for road .... This necessary because some trees redirect flows to erode banks and open new channels, which man will want to "fix".

4

Response: We do not support this revision.

---

280 **Comment:** Page C-25, A1 Riparian Area Buffers - recommend a buffer of 200 feet (each side) for streams Type 1-3, a buffer of 100 feet (each side) for Type 4, and a buffer or 50 feet (each side) for Type 5, these buffers need to be regulatory.

77

Response: Comment noted.

---

281 **Comment:** Page C-25, A1.h Grazing - should also include livestock exclusion fencing.

77

Response: Comment noted.

---

282 **Comment:** Page C-25, A1 and A2 Performance Measures for Wetlands and Riparian Areas - proscriptive regulations which should be entirely scrapped; pages C-25 through C-27 could be condensed into one line "maintain, enhance and develop sufficient wetlands and riparian functions to enable salmonid restoration by using best available management practices tailored to each riparian area."

35

Response: Comment noted.

---

283 **Comment:** Page C-25, A1 and A2 Performance Measures for Wetlands and Riparian Areas - Are excessive and not supported by any scientific data to justify their imposition.

128

Response: See #58.

---

284 **Comment:** Page C-25, A1 and A2 Performance Measures for Wetlands and Riparian Areas - Regional or watershed specific standards may need to be applied for riparian areas, but in the meantime the standards represented in the Wild Salmonid Policy are adequate. These are standards that need to be enforced and implemented immediately. Development of standards in individual watersheds may take considerable time to be developed, yet implement it. Watershed analysis has only been done in a few watersheds. If numeric standards are to be developed based on watershed analysis, it will cost money, it will take many years for standards to be developed.

284

Response: We agree.

---

285 **Comment:** Page C-26, Action Strategies for Wetlands - Should include a no net loss policy because as the DEIS states, wetland replacement is difficult to attain, should protect remaining wetlands that are intact for salmonid habitat and for natural stormwater retention.

77

Response: Comment noted.

Lakes and Reservoirs

286 **Comment:** Dams create severe impacts on salmonids, need more discussion of the effects of Columbia/Snake River hydro-system operations and other watersheds.

241, 269, 276, 301A, 387

Response: We feel our discussion is adequate for this EIS. We have provided excellent references for additional detail.

---

287 **Comment:** A list of the lowland lakes which could offer productive habitat for wild salmonids if management policies for those systems were changed should be added. Various management alternatives for these lakes could be associated with each alternative.

471

Response: Specific lists are beyond the scope of the FEIS.

---

288 **Comment:** McHenry et al (1996) pertaining to Lake Ozette sockeye is cited at page C-30 but does not appear in the list of references.

471

Response: Corrected.

---

289 **Comment:** Page 53, Entire paragraph on impacts to lakes and reservoirs - This paragraph is an admission that the state has not been enforcing the Hydraulic Code in a manner that protects salmonid habitat.

401

Response: See #69.

Marine Areas

290 **Comment:** WSP needs to address ocean survival.

60, 208, 275, 289, 319

Response: Edits were made in Chapters II and V.

---

291 **Comment:** Need more detail about, protection for nearshore marine habitat.

64, 79, 131, 208, 253, 289, 293, 310, 324, 328, 340, 364

Response: We feel the level of detail is adequate for this FEIS; agree about protection.

---

292 **Comment:** Concerned about habitat degradation of Puget Sound and Strait of Juan de Fuca (eel grass and kelp, bulkheading).

79, 354, 364, 405

Response: Comment noted.

293 **Comment:** Need to restrict trawl fishery to protect eel grass, kelp.

79, 310

Response: Trawl fisheries are not allowed in Puget Sound proper and in other areas limited to depths where eelgrass and kelp is not affected.

---

294 **Comment:** Recognize the vital role played by all habitat throughout the life cycle of salmonids. Aquatic lands (marine lands) are a vital link between freshwater and saltwater habitats. Also provide important habitat for prey species for wild salmonids. The Wild Salmonid Policy is consistent with our goals for these lands.

278

Response: Comment noted.

---

295 **Comment:** Need better regulations to restrict estuary development that affects juvenile rearing and passage.

298

Response: Comment noted.

---

296 **Comment:** Need "net gain" philosophy for mitigation of marine habitat impacts.

321, 364

Response: We agree.

---

297 **Comment:** Support mitigation sequencing.

364

Response: Comment noted.

---

298 **Comment:** Sediment transport to marine areas is critical, policy must address.

364

Response: The policy does.

299 **Comment:** Page 25 - Support goals for marine areas, must protect eel grass, herring spawning, intertidal forage fish habitat and intertidal wetlands.

321

Response: Comment noted. See #294 and #302.

---

300 **Comment:** Page 53 (Impacts to marine areas) - Many of the problems could be addressed if the state actively enforced the Hydraulic Code and denied permits regardless of what the majority of the planning and permitting agencies allow.

401

Response: See #69 and #220.

---

301 **Comment:** Page C-32 - No net loss of eel grass...Success of this measure would depend in large part on control of Spartina, need to work with other agencies on this.

359

Response: We agree.

Fish Access and Passage

302 **Comment:** Need to concentrate on repair, removal of stream blockages, fish ladders around permanent blockages (culverts, tidegates, dams).

65, 129, 179, 203, 261, 278, 287, 297, 340, 354, 355

Response: Comment noted.

---

303 **Comment:** Need to work with local government and landowners to replace impassable culverts, establish some priorities, time lines, and cost share assistance, funding and incentives.

72, 359

Response: This level of detail is beyond the scope of the FEIS.

---

304 **Comment:** Bedload sediment, especially on alluvial fans of tributaries to larger rivers can create fish passage barriers.

359

Response: We agree.

---

305 **Comment:** Get rid of Condit Dam.

58

Response: We support its removal.

---

306 **Comment:** Why aren't you passing sockeye over Lake Aldwell and Lake Sutherland?

294

Response: It is not feasible at this time but would be considered as part of watershed planning.

---

307 **Comment:** Concern about application of screening standards in resident fish areas.

358

Response: Comment noted.

---

308 **Comment:** Enact legislation/rules to require: All stream blockages must be fish passable.

98, 187, 298

Response: Comment noted.

---

309 **Comment:** Tear down the dams.

187

Response: Comment noted.

---

310 **Comment:** Remove Elwha dams as case study in restoration.

187

Response: Comment noted.

---

311 **Comment:** Page 54 - The DEIS states "Fish and Wildlife has entered into an agreement with cities and counties to correct these problems..." The Fish and Wildlife has been extremely lacking in enforcement of fish passage as private property owners have an obligation to provide for passage. Therefore, the issue would not be one of available funding, but one of compelling the owners or operators of facilities that block passage to provide for passage. In some basins, the reestablishment of passage might be the greatest single factor in the restoration program. It is the understanding of the Muckleshoot Tribe that the Fish and Wildlife has not compelled an owner or an operator of a salmon migration barrier to provide passage unless an HPA was being applied in relation to some work that was related to or would alter the barrier.

401

Response: Comment noted.

---

312 **Comment:** Page C-36 - The WDFW estimates 3,000 miles of anadromous habitat no longer accessible to the salmonids due to impassable culverts. Has this also been done for resident fish? If not, this needs to be done soon in order to comply with Appendix C-36, Action Strategy A.

284

Response: Complete surveys have not been done for resident fish. We agree that surveys should be done.

Habitat Restoration

313 **Comment:** Note - the following comments were in response to a survey question, "As a landowner, under what circumstances would you allow restoration to occur on your property?

-If minimal or no cost to landowner, no tax increase - 36, 164, 197, 208, 363
-If WDFW pays all costs - 17
-If WDFW buys the land - 406
-If easements are acquired - 406
-If WDFW provides restoration leadership on their lands - 212
-If cost sharing - 8, 94, 202
    -Equal cost sharing - 12
    -Minimal landowner cost share - 108,197,226
-Where it can be economically accomplished - 9
-At minimum cost/maximum benefit - 191
-Where the need and usefulness is demonstrated, results - 9, 48, 54, 57, 68, 80, 93, 102, 109, 195, 205
-Where there is help to identify and correct the problems - 223
-Where adjacent lands can be managed for full economic benefit of the landowner - 9
-Where there is a system in place to recognize and reward the landowner for meaningful contribution - 9

-If compensated in some manner for reduced land use or income: tax breaks, grants, annual stipend to allow angler access - 15, 20, 25, 28, 33, 46, 49, 53, 54, 92, 94, 100, 104, 111, 163, 196, 204, 207, 216, 259
  -Cut property tax by 50% or more - 121
  -Full compensation - 170, 224
-Where restoration:
  -Does not adversely affect (present or anticipated use of the land) - 15, 36, 53, 97, 195
  -would help with restoration - 15
  -Allows landowner limited access to any streambank - 55
  -Allows reasonable use of remaining property - 197
  -Allows landowner access to remaining property - 200
-If site cleaned up, replanted - 164
-When real issues are taken care of (harvest) - 31
-Where there is an atmosphere of cooperation, trust, WDFW encouragement, commitment to word, mutually acceptable, shared long-term stewardship vision, voluntary - 38, 49, 68, 94, 164, 184, 196, 197, 204, 208, 223, 413
-Where there is total landowner involvement in the restoration plan and implementation - 39, 92, 109
-Where riparian zones are deeded, given easements to the state - 54
-Where help is provided if repairs are needed - 68
-Where regulations are more reasonable, flexible - 90, 226
-Where there is no damage to property - 97, 109, 208
-Where restoration provides mutual benefits (e.g., property protection) - 108
-When all landowners (forest, ag, urban) and citizens contribute their fair share - 111, 123, 212
-When funded and built by Conservation Districts - 114
-Where streams are maintained with dikes, berms, cottonwoods removed - 201

-Under most conditions: 61
  -Would make any change within reason - 62, 179, 202
  -As needed, with permission - no trespass - 80, 166
  -For all wildlife - 202
  -Only to the extent required by law - 181
  -Wherever a game or non-game species were being negatively impacted - also sensitive botanical areas - 215

-Under all conditions: 71,73,118,119,178,185,200
  -The rights of society outweigh the rights of the individual when it affects the good of all 251, 259
  -Returning salmon increase the value of real estate - 259
  -Would not allow restoration under any condition - 213
  -State cannot be trusted not to restrict use after habitat is restored - 32

Response: Comments noted.

---

314 **Comment:** There is no need for restoration on this property, habitat is restored to as close as possible to the past.

244

Response: Comment noted.

---

315 **Comment:** Need stable restoration funding, source in the capitol budget.

361, 364

Response: We agree.

---

316 **Comment:** Need good evaluation and monitoring procedure.

12, 355

Response: We agree.

---

317 **Comment:** Restoration projects need to be fail safe.

13

Response: We agree.

---

318 **Comment:** Need time line or goal for determination of complete recovery.

28

Response: This would be part of watershed planning.

---

319 **Comments:** Must restore habitat where possible.

29, 94

Response: Comment noted.

---

320 **Comments:** Need aggressive restoration program to go along with acquisition and protection.

109

Response: Comment noted.

---

321 **Comments:** Restoration meaningless without habitat protection.

223

Response: Comment noted.

---

322 **Comments:** Opposed to restoration that does not address the cause of damage first; if you remove the cause restoration will occur naturally.

3

Response: Comment noted.

---

323 **Comments:** Strong believer in "restore the habitat and they will come."

7

Response: Comment noted.

---

324 **Comments:** What specific habitat enhancement measures would actually be implemented under the WSP?

11

Response: This level of detail is beyond the scope of the DEIS. However it could include riparian area planting, erosion control, fish passage, bank protection, off-channel ponds, etc**.**

---

325 **Comments:** What provisions, if any, are included for enforcement and assurance that habitat enhancement measures would actually be implemented?

11

Response: This level of detail is beyond the scope of this EIS, Funding could come from a variety of sources or volunteer labor, materials and equipment could be used.

---

326 **Comments:** Not using remote site incubators would permanently impair the efforts of enhancement groups to seed creeks that have been destroyed by urbanization or sediment/lack of shade, RSIs simulate natural environment.

103

Response: RSI's would still have a role, but should not be considered a pancea for poor habitat protection, habitat must still be suitable after leaving RSI.

---

327 **Comments:** Recommend using short freshwater residence fish (chum salmon) in urbanized watersheds to avoid heavy run-off problems.

131

Response: This makes good sense.

---

328 **Comments:**
-Responsibility for restoration is unclear
-Cannot mandate restoration as part of a new action/application

273

Response: Comment noted.

---

329 **Comments:** Restoration will be expensive, but necessary, must be designed, constructed and monitored with qualified staff, based on sound science and technology.

12, 13, 92, 273, 330, 355

Response: We agree.

---

330 **Comments:** Don't let the use of "best possible science" paralyze restoration efforts involving livestock exclustion, fencing, placing of large woody debris and riparian zone vegetation.

380

Response: Comment noted.

---

331 **Comments:** Involving citizens in restoration efforts will build sense of community and stewardship.

355

Response: We agree.

---

332 **Comments:** Page 26 - Habitat within some reservoirs is more conducive for warmwater non-native fishes. Habitat within these reservoirs could provide native salmonid habitat, but only through operational changes. Some of these operational changes to provide salmonid habitat are unrealistic.

284

Response: Comment noted.

---

333 **Comments:** Page 26 - This goal is laudable and should be the target. However, this goal conflicts with many of the narrative standards identified elsewhere in the DEIS. Perhaps a way to resolve this is to rewrite this goal as follows: "Restore the natural variability for watershed processes and disturbance regime to create natural levels conducive for the maintenance and creation of salmon habitat."

401

Response: Your suggestion is a good addition but may constrain will conceived active restoration projects.

---

334 **Comments:** Page 26 and Appendix C-4: What does just providing the opportunity and time for watersheds and marine areas to mend themselves mean exactly?

35

Response: See comment #333.

---

335 **Comments:** Page 27 - It states "Full habitat restoration ...." It is doubtful that full habitat restoration will be achieved when the numerical performance for habitat have been achieved because these standards to not address habitat forming processes that will create current habitat and create future habitat. The goal should be rewritten as follows: "Habitat restoration within watersheds and marine areas will be ultimately achieved when the fundamental driving processes for habitat creation and maintenance have been restored to a level approaching the natural rate."

401

Response: See numbers 54,56,123, and 333.

---

336 **Comments:** Page 48 - Impacts of the alternatives - Any recovery plan will require a lot of time and also means allowing many, if not all watersheds to recover on their own, without our intervention, would also be more economically feasible, if we have the will and patience to wait.

146

Response: Comment noted.

---

337 **Comments:** Appendix C-39 Action Strategy K - (coordinated GIS) - supports this action strategy.

236, 405

Response: Comment noted.

Built Environment

338 **Comments:** Page 65 - Throughout the DEIS many actions are listed as causing harm to fish and are within the regulatory scope of the Hydraulic Code. The FEIS should explain why actions deemed detrimental to salmon and within the regulatory purview of the Hydraulic Code are permitted to occur.

401

Response: See comment number 69 and 79.

---

339 **Comments:** Page 68 - Land and Shoreline Use - The discussion of the strong enforcement of instream regulations should be separate from that of the addition of new regulations. There is little to be achieved by conceiving new regulations until we have determined what the proper enforcement of current regulations will grant. By blending the two issues together, the DEIS has skillfully created that opinion that strong enforcement of current regulations is not viable.

401

Response: Comment noted.

---

340 **Comments:** Page 69 - Land and Shoreline Use - states "There would impacts to some public services and jobs." The DEIS fails to acknowledge the potential adverse impacts to treaty and non-treaty fishing.

401

Response: Comment noted.

---

341 **Comments:** states "Landowners and counties that currently have limited resource protection ordinances would be significantly impacted by statewide regulations." There should be comparable discussion of the impacts of each alternative over the short-term (under 10 years), the mid-term (10 to 25 years), and the long-term (over 25 years) upon salmon harvest opportunities for

tribes and basins that rely upon hatcheries for salmonid production versus tribes that rely upon natural production.

401

Response: This level of detail is beyond the scope of the DEIS.

---

342 **Comments:** The DEIS states "There would be statewide regulations ....." Many of the actions listed in this paragraph are already regulated by the Hydraulic Code and other statewide regulations.

401

Response: See number 338.

---

343 **Comments:** Pages 69, 70 - The DEIS has drawn conclusions regarding adverse impact to private property and industry without stating many of the proposed controls. This makes it difficult for a reviewer to ascertain the proposed measures to protect salmonids and salmonid habitat as well as what the potential impacts might be.

401

Response: Comment noted.

---

344 **Comments:** Page 70 -states "The statewide requirement of buffer protection zones as performance measures would have a major impact on the timber industry." The protection zones described in the DEIS are within the range of those prescribed for watershed analysis. The state is mandated that all watershed administrative units will undergo watershed analysis. As one purpose of watershed analysis is to determine and prevent adverse impacts to public resources, implementation of this alternative should have no impact upon the timber industry beyond the status quo.

401

Response: Comment noted.

---

345 **Comments:** Page 73 - states ".... but allow more flexibility in addressing the conflicts between salmonid and human needs." As most laws purported to protect salmonids and salmonid habitat are already loosely enforced, one could argue that the flexibility already inherent and used in the current regulatory regime is the cause of many of our problems. An example of this flexibility is discussed in previous comments regarding fish passage.

401

Response: Comment noted.

Urbanization

346 **Comments:** People very sensitive to adding additional layers of regulations on top of recent GMA critical areas regulations, WDFW was active intervenor in GMA, should back off regulatory approach.

35

Response: See number 144 and 347.

---

347 **Comments:** Need better integration of salmonid conservation into GMA planning and implementation.

15, 282, 285, 315, 328, 354

Response: We agree.

---

348 **Comments:** The department should recommend existing human facilities near rivers, lakes and streams comply with the intent of the overall policy.

35, 235, 244

Response: We agree.

---

349 **Comments:** Growth will continue, economic climate and quality of life will attract more people to state, will result in continued urban, suburban, and rural development resulting in high water flows from impervious surfaces, low water flows from domestic water withdrawals, loss of fish passage, wetland losses, and pollution and fish kills from pesticide, petroleum and sewage spills.

2, 29, 72, 140, 153, 328

Response: We agree the challenge is to minimize these impacts.

---

350 **Comments:** Gradually close hatcheries and concentrate on land use ordinances to control stormwater, flooding, and to promote streamside habitat restoration.

7

Response: Comment noted.

351 **Comments:** Habitat destruction in urban areas precludes restoration of habitat for wild fish, must rely on hatcheries.

243

Response: See number 178.

---

352 **Comments:** Volunteers may be more effective working on land use planning issues in addition to actual hands-on restoration efforts.

253

Response: We agree.

---

353 **Comments:** Contain growth within Urban Growth Areas, rural residential lots at 5 acres too small.

244, 354

Response: We agree.

---

354 **Comments:**
-Need close coordination with local government planning and implementation - 119
-Need better regulations to:
-Get local government to regulate urban growth - 109, 199, 244
-Require better protection, riparian area buffers - 116, 120, 123, 129, 244
-Control urban nonpoint pollution - 199
-Less paving, warehouses, other development along flood plains, within watersheds - 216, 339, 349
-Permeable paving, other runoff control - 339
-Constraints on conversion of rural forest lands to residential or commercial - 298

Response: We agree.

---

355 **Comments:** Local government buffers based on public process, adequate.

330

Response: Comment noted.

Agriculture

356 **Comments:** Unless pressured by EPA won't see any changes with ranchers and CAFO operations.

2

Response: Comment noted.

---

357 **Comments:** Agriculture contributes to habitat destruction, stream channelization, wetland separation destruction, DEIS needs more detail.
29, 328, 391

Response: The level of detail is adequate for policy-level programatic EIS.

---

358 **Comments:** Regulate farming.

29

Response: Comment noted.

---

359 **Comments:** Need non-point source program for agriculture.

391

Response: Comment noted.

---

360 **Comments:** Need to provide credit for positive efforts.

409

Response: Text has been edited.

---

361 **Comments:** Salmonids evolved with herbivory; large herbivores existed 10,500-7000 years ago, biological conditions as they existed at the time of European contact do not represent a climax or pristine natural state.

34

Response: Comment noted.

---

362 **Comments:** Promoting maximum riparian buffers alienates landowners, need to find site-specific ideal compromise that suits needs of fish and landowner.

107

Response: Comment noted.

---

363 **Comments:** Smaller buffers require less acreage deferred from farming and will provide most salmonid habitat needs.

107

Response: Comment noted.

---

364 **Comments:** Need to maintain agricultural drainage, have been thwarted by WDFW.

176

Response: Comment noted.

---

365 **Comments:** Per National Research Council "Upstream: Salmon and Society in the Pacific Northwest," Many human activities .... notably forestry, agriculture, ... have contributed to the degradation of (habitat), habitat on these lands needs to be protected.

63, 156

Response: Comment noted.

---

366 **Comments:** Legislation affecting water use and agricultural practices will be vigorously opposed - respect water rights.

174

Response: Comment noted.

---

367 **Comments:** Need to develop agricultural best management practices (including riparian buffers) using a forum similar to TFW, could set policy and administer experiments funded by government agencies to improve existing BMPs, more acceptable than arbitrary rules with no compensation being considered.

176

Response: We would participate in such a forum.

---

368 **Comments:** Would not support agricultural forum.

330, 409

Response: Comment noted.

---

369 **Comments:** Agriculture needs to engage in watershed planning.

330

Response: Comment noted.

---

370 **Comments:**
-Need legislation/rules to:
-Fence cows, livestock out of streams - 54, 98,. 120, 129, 251, 391
-Eliminate streamside vegetation destruction and agricultural pollution - 102
-Larger stream buffers - 116, 120, 129, 391
-Lowland agricultural areas need more protection - 123

Response: Comments noted.

---

371 **Comments:** Need an Agricultural Practices Act.

205

Response: Comment noted.

---

372 **Comments:** Page 49 - Agricultural Drainage - agricultural drainage -text would be more accurate if it stated that most drainage work is maintenance of existing drainage that is critical to continuation of agricultural activities.

107

Response: Text was edited.

---

373 **Comments:** Page 49 - Agricultural Drainage - perpetuation of agriculture is as much a part of GMA as is protection of critical areas - suggest the following change "Most agricultural activities are exempt from riparian buffer requirements or other critical area protections required under GMA as it also the intent of GMA to perpetuate agriculture in the State of Washington. There will be a continuing effort to maintain drainage of agricultural land through stream dredging, ditch maintenance and/or dike construction and maintenance."

107

Response: Comment noted.

---

374 **Comments:** Page 65 - Impacts - states large livestock farmers are required to get an NPDS permit and be in compliance. This should be modified to: "...within Washington State, when dairy operators have water pollution problems they are required to obtain a Dairy Waste General Discharge NPDES permit and comply with this permit over a five year period. These dairies are considered concentrated dairy animal feeding operations. Other livestock farmers within the state may meet the concentrated animal feeding operation definition and may be eligible for coverage under an individual NPDES permit depending upon their specific situation."

271
Response: Comment noted.

---

375 **Comments:** Page 70 - Agricultural Discharges - Suggest language such as: "Tougher standards for agricultural water discharges (such as irrigation outfalls, manure, waste food, waste bedding material, liquid manure, process generator, waste water, silage runoff or leeching, and any precipitation which comes into contact with any manure, litter, bedding material or any other raw material or final product), fish screens and passage would be required."

271

Response: Comment noted.

---

376 **Comments:** Under Land and Shoreline Use for each alternative stream buffer zones and fencing requirements are mentioned, fencing is impractical because of need to maintain drainage. Fencing needs to be part of a comprehensive stream maintenance program that provide the best possible conditions for salmon and farming.

107

Response: First sentence comment noted. We agree with the second sentence.

---

377 **Comments:** Need better enforcement to control grazing, water access: use tanks away from stream.

93

Response: Comment noted.

Forest Practices

378 **Comments:** Policy should address the option of the Timber, Fish and Wildlife (TFW) process to provide protection for wild salmonids on state and private forestlands, TFW cooperators and other reviewers acknowledge need for healthy fish stocks, managed forests are better for fish and wildlife habitat overall.

16, 144, 148, 160, 230, 241, 262, 263, 269, 278, 287, 318, 319, 323, 337, 338, 350, 365, 369, 381, 387, 404, 407, 428, 429, 432, 451, 457

Response: Alternative 3 has been re-written to include the TFW process as an important implementation tool. Chapters 3 and 5 acknowledge the value of forestlands for maintaining fish habitat; Appendix C includes several action strategies that encourage maintenance of forestland over the long term to meet the wild salmonid policy goal.

---

379 **Comments:** Strategies in the Wild Salmonid Policy for implementing habitat goals are consistent with the Forest Practices Act. While the DNR and other timber, fish, wildlife participants can make a commitment to provide the protection fish need and enforcement areas need to curtail over harvesting of fish and need to provide access to spawning and rearing grounds and fix obstruction to fish passage due to dams and culverts; forest land managers who have been the primary focus of habitat improvement efforts are glad, finely, to have harvest levels and hatchery and hydro issues on the table. Only by discussing all the impacts collectively, can we solve these issues.

278

Response: Comment noted.

---

380 **Comments:** The Wild Salmonid Policy is consistent with and compliments the landscape approach that is being undertaken by major forest land owners including the state.

278

Response: Comment noted.

---

381 **Comments:** Timber harvesting methods need to be changed to reflect best management practices for water quality and salmon habitat, including selective harvest (i.e., no clearcutting), no harvest on steep slopes, fewer and better constructed roads.

7, 29, 80, 81, 354

Response: Comment noted.

---

382 **Comments:**
-Forest practices regulations need to:
-Provide better clean-up of logging operations, especially slash in streams - 73

-Manage forest to protect streambed - 93
-Need to enforce FPA rules - 41, 109

Response: Comments noted.

---

383 **Comments:** Selective logging, uneven aged management won't work in western Washington, also counterproductive because it results it chronic disturbance without the recovery you get from longer clearcut harvest rotations that allow recovery.

72

Response: Comment noted.

---

384 **Comments:** Suspect timber planning for harvest thresholds across mixed ownerships creates legal problems for owners, but may be possible through watershed analysis.

72

Response: Comment noted.

---

385 **Comments:** Per National Research Council "Upstream: Salmon and Society in the Pacific Northwest," Many human activities .... notably forestry, agriculture, ... have contributed to the degradation of (habitat), habitat on these lands needs to be protected.

63, 156

Response: Comment noted.

---

386 **Comments:**
-Forest management has certainly had a negative effect on habitat over the last century. Nearly everyone in the forest products industry and forestry profession agrees we must bear our share of the effort needed to protect and restore salmonid habitat. DEIS described the problems with forest practices, but positive changes have occurred: 1) Northwest Forest Plan (significant harvest reductions, replanting, habitat recovery), 2) riparian area buffers required since 1988 on state and private lands through TFW consensus, Shoreline Management Act required buffers since the 1970's, buffers left voluntarily since the 1970's, wetland buffers in 1992, in 1996 buffers were required on Type 4 streams unless landowner could prove the streams contain no fish, 3) 1992 FPB rules included a requirement for watershed analysis, many state and private landowners conducting them. Forest Service is also doing watershed analysis on their lands, Habitat Conservation Plans under ESA have been prepared by DNR and others (by year 2000, most industry lands will have HCPs, most of which will have larger buffers than what the DEIS calls for, 4) most large timber companies now employ fisheries and wildlife biologists, hydrologists and other specialists in water and land ecosystems and they have major input into forest management decisions, including logging and road construction operations, 5) harvest reduced substantially in

the 1990's, mostly due to environmental reasons, clearcuts are smaller, more volume coming from thinnings, better equipment, less soil disturbance, better road construction, less broadcast burning, more rapid replanting, quicker site recovery, 6) some pulp mills permanently closed and remaining ones practicing better water conservation - 72, 128, 179, 196, 350

-Have been involved in habitat restoration projects voluntarily, forest industry is demonstrating a commitment to doing their share - 128, 338

Response: Comment noted and please see numbers 38, 62, and 378.

Legislative and/or Rule Changes are Needed for the Following Forest Practices Issues

387 **Comments:**
-Timber removal limits (clear cuts, exports, old growth, state lands, steep slopes, critical areas, etc.) - 48, 98, 99, 104, 129, 166, 189, 199, 222, 259, 339,
-Wider stream buffers - 98,112,116,120,129,208,251, 259
-150' buffers on all live water for timber cutting - 102
-Road construction, maintenance - 99, 208
-decommissioning old logging roads - 98
-Revise to allow DNR to regulate streamside habitat - 117
-Accurate stream typing - 191,194
-Restrictions on use, income should be reimbursed - 39
-Salvage riders should be abolished - 80

Response: Comments noted.

Riparian Area Buffers

388 **Comments:**
-Enforce streamside buffers - 7,29
-Require wider buffers - 80, 354, 355

Response: Comments noted.

---

389 **Comments:** Own a tree farm and support the need for recommended buffers as a means to protect stream for fish and wildlife, have seen and understand the impacts of leaving inadequate buffers.

122

Response: Comment noted.

Economic Impact/Compensation/Ramifications/Management Flexibility

390 **Comments:** Proposed buffers would result in significant economic impact on individual landowner and economy as a whole (reduced harvest, increased expense), would constitute a "taking" that should be compensated, would lead to accelerated cutting to preclude economic loss, acts as a disincentive to retain timberland (would sell, or convert to other uses), support buffers and other protective measures per se, but should be able to manage for salmonid habitat needs based on site - not prescriptive buffer.

16, 23, 37, 42, 69, 70, 96, 113, 128, 130, 144, 145, 147, 148, 153, 161, 172, 173, 196, 230, 245, 250, 261, 266, 287, 297, 304, 318, 322, 323, 327, 338, 356, 357, 365, 376, 381, 413, 415, 430, 437

Response: Comment noted and please see numbers 182 and 378.

Disproportionate Burden/Other Actions Have More Impacts

391 **Comments:**
-Unfair to target and burden timber land owner, while other land uses (development, agriculture, water use, transportation systems have habitat impact, but are not subject to the same rules - 42, 72, 96, 128, 140, 148, 172, 176, 322, 338, 356, 365, 381

- Small landowner should have some waiver or option plan for these rules - 42

Response: Policy applies to all land uses statewide. See also nubers 6, 8, and 9.

392 **Comments:** Timber harvests and natural event (fire, storm events) were more severe in past, yet fish populations remained strong or recovered (Mt. St. Helens eruption); timber harvest not the problem, must address harvest and hatcheries issues.

3, 42, 65, 67, 144, 148, 151, 196, 229, 250, 266, 281, 322, 415

Response: Comment noted.

---

393 **Comments:** Rules are more reasonable, practical and flexible than WSP measures, should let FPB rules work before imposing new restrictions.

44, 69, 148, 168, 229

Response: Comment noted.

---

394 **Comments:** Incredible that after 30 years of laws and regulations that government agencies and private companies can't install a culvert properly.

60

Response: Comment noted.

---

395 **Comments:** WDFW appears to be only mildly interested in forest practices; this combined with poorly written laws has resulted in poor streamside protection.

60

Response: Comment noted.

---

396 **Comments:** Need more assistance and incentives for providing fish and wildlife habitat on forest lands.

41, 147, 356

Response: We agree. Meaningful incentives must be integrated into all land use activities.

---

397 **Comments:** Have opted our forest lands into long-term forestry under GMA.

147

Response: Comment noted.

---

398 **Comments:** Developing a Habitat Conservation Plan with US Fish and Wildlife Service.

147

Response: Comment noted.

---

399 **Comments:** Recommends current FPA rules for Type 1-3 waters remain the same, a 50 foot equipment buffer on Type 4s and a 25' equipment buffer on Type 5s , ground within these buffers would be managed by partial cutting only, directional felling and yarding, and Type 4-5 stream crossing flexibility for ground skidding.

151

Response: Comment noted.

---

400 **Comments:** Tree farm is managed as an economically viable forest, operate on sustained yield basis, recognize the importance of diversity, timber, watershed, soil health, wildlife, fish and recreation are values integrated into management plan.

147

Response: Thank you for your stewardship efforts.

Dams and Reservoir Management

401 **Comment:**
- Per National Research Council "Upstream: Salmon and Society in the Pacific Northwest": The many dams on the Columbia River and its tributaries cumulatively have had large effects on salmon survival .....migration hazards for smolts especially; need to improve salmon survival rates ...using all available alternatives.

63, 152, 156

Response: Granted, there is considerable debate about the efficacy of numerous mitigation strategies for the Columbia and Snake River dams and water management, WDFW is convinced the current reliance on in-river transportation, spill and intake screening has not provided the survival levels necessary to recover Columbia and Snake River salmonids. We have reorganized our operations to be more fully included in these issues.

---

402 **Comment:** Per the Independent Scientific Group "Return to the River: Restoration of Salmonid Fishes in the Columbia River Ecosystem" Key to rebuilding fish and wildlife is suitable habitat throughout the life cycle, provide a continuum of suitable habitat instead of a patchwork, need too adopt a salmonid life history ecosystem concept.

63, 152, 156

Response: See response #401.

---

403 **Comment:** Opposed to draw-down of John Day pool, would have devastating effects on largemouth and smallmouth bass as well as other aquatic and upland animals, will also have significant negative affects on commercial barging, wetlands, recreation, irrigated agriculture and power generation, all based on inconclusive justification to provide better in-river migration conditions for salmonids.

231

Response: See response #401.

---

404 **Comment:** Need to strive for normative conditions within the mainstems of the Columbia and Snake Rivers in order to be successful at increasing the biodiversity of the ecosystem and eliminating/reducing non-native species by eliminating homogeneous habitat created by the impoundments.

152

Response: See response #401.

---

405 **Comment:** Columbia River barging doesn't work, expensive, requires handling, fish subjected to disease, benefits appear to outweigh the costs.

293

Response: See response #401.

---

406 **Comment:** Columbia River reservoir drawdown or dam breaching is not discussed in WSP, but for Washington native salmonids in the Snake basin, this may be the only way they will be recovered.

132, 152

Response: See response #401.

---

407 **Comments:** Supports removal of Elwha dam.

7, 84

Response: We agree.

---

408 **Comments:** Need better design of fish passage facilities .

7, 293

Response: We are continually studying and evaluating better design for fish passage.

---

409 **Comments:** Would like to see Federal dollars go to creating fish passage around the hydroelectric dams.

7

Response: Comment noted.

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410 **Comments:** Little or no prospect of removing the dams if we are to sustain present populations and even more people in the future.

60

Response: Comment noted.

411 **Comments:** BPA has substantial investment on the Columbia River for no gain at all.

72

Response: Comment noted.

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412 **Comments:** Supports dismantling or restructuring of all dams and other manmade fish killers.

110

Response: Comment noted.

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413 **Comments:** Does not support the "right" of aluminum companies to cheap hydropower.

110

Response: Comment noted.

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414 **Comments:** Does not support the "right" of the electric companies to sell excess electricity for enormous profits.

110

Response: Comment noted.

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415 **Comments:** Want Corps of Engineers to address problems they created by destroying Celilo Falls, building dams without adequate screening, poor fish ladders, the Snake River horrors, etc.

110

Response: Comment noted.

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416 **Comments:** WSP will be incomplete until it addresses hydropower impacts on the fish - strengthen the WSP as follows: adopt the "Protected Areas" rule by the Northwest Power Planning Council which bans licensing and construction of new hydroelectric projects on high-quality and other fish streams in the Pacific Northwest.

156

Response: This suggestion will be considered in policy drafting.

417 **Comments:** WDFW must commit itself to actively seeking: an end to the failed juvenile fish transportation program in the Columbia River, a decision by NMFS, other federal agencies and NWPPC to pursue in-river migration, ecosystem restoration path to salmonid recovery.

156

Response: See numbers 401 through 406.

Implementation Issues

418 **Comments:** Implementation should include: accountability for what all parties are doing to meet the WSP goal, identification of desired habitat conditions or levels of fish production over time, identification of current activities that are consistent with WSP, or actions that should be taken, review of each WDFW program for consistency, and development of partnerships with other agencies.

61, 232, 278, 282, 289, 319

Response: We agree.

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419 **Comments:** Supports a voluntary, locally-led planning process to solve local resource problems. Landowner must be a decision-maker in the process, must be the landowner's plan not an agency plan.

80, 158, 226, 444

Response: Comment noted.

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420 **Comments:** Existing regulatory framework thwarts significant accomplishments, need to set aside existing laws and rules whenever proposals meet/exceed intent of the laws and rules (e.g., HB 1866).

35

Response: This concept is intriguing.

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421 **Comments:** Many or all performance measures mentioned indicate develop a statewide organized forum be established. Considerable work needs to take place in the next step in developing performance measures.

284

Response: We agree.

Watershed Councils

422 **Comments:**
-Need to review and evaluate how existing watershed councils will be utilized in implementing WSP - 232
-Need to consider what activities would also be addressed at the state level, independent of local watershed councils - 232
-Must identify the composition of councils, lead agency, funding, level of state support and involvement, level of authority, and accountability - 54, 262, 271, 305, 314, 330, 376, 380, 407
-Transfer authority and control to watershed councils in areas that have a habitat improvement program in place - 163
-Regional Fisheries Enhancement Groups need to be part of councils - 384

Response: See number 2.

Interagency Coordination

423 **Comments:** WSP must make a direct and significant linkage to the Magnuson-Stevens Act - specifically the "essential fish habitat" provisions of the act and the NMFS implementing rules.

52

Response: We agree. We are directly involved with PFMC habitat steering group to address this issue.

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424 **Comments:** Need to address and resolve implementation of WSP in areas already covered by HCPs.

139

Response: We agree. See number 2.

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425 **Comments:** Believes the habitat performance measures and action strategies are the standards by which WDFW will implement the policy. It is imperative that the technical agencies agree on the standards prior to providing technical assistance to locally-led watershed groups, agencies will lose credibility if in conflict with each other.

158

Response: We agree. See number 2.

Enforcement

426 **Comments:**

-Need to monitor and enforce existing regulations: - 33, 104, 118, 181, 182, 184, 185, 188, 191, 204, 223, 257, 263, 273, 310, 321, 350, 355, 391, 399

-Need strict enforcement of all violations - 8, 54, 97,

-Fines from violations used to restore habitat - 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 205, 259

-Identify most sensitive watersheds, ban all development in these watersheds, stabilize watershed and begin habitat restoration - 8

-Fully protect areas with highest potential production - 20

-Enforcement of fish passage regulations - 13,73

-Equal enforcement regardless of power, money - 53

-Enforce existing laws, then evaluate need for more - 11, 228

-State agencies must obey existing habitat regulations - 205

-Need better funding for enforcement - 310, 328

-Utilizing enforcement authority to achieve the objectives of this document is generally good policy. However, the standards for implementing enforcement action already exist outside this document and should remain there - 350

Response: Comments noted.

WDFW Staffing/Authority

427 **Comments:**

-Habitat Administration

-WSP implementation needs to establish program manager who reports to the director, policy implementation team - 132, 358

-WDFW should be more active in habitat protection, provide technical information, advocacy regardless of their level of authority - 175, 355

-Need specific staff expertise - 132, 220

-Administration of Hydraulic Code and Hydraulic Project Approval

-Need more contact with and technical assistance from WDFW personnel- if given proper technical support, most landowners will do the right thing for habitat, avoid citations. - 17

-Reduce permit processing time - 201, especially for habitat improvement projects - 410

-Need more field biologists to reduce HPA backlog, provide more time for compliance - 77

-Concerned about unequal application of hydraulic code (different standards depending on applicant and/or biologist) - 27

-HPA provisions for culverts, bridges, etc should be enforced - 175

-Set high standards for the administration of the HPA - 220, 364, 405

-Need more rigorous enforcement of HPA - 61, 109

-More flexible instream work windows, impossible to schedule and complete work during the allotted time period - 17, 201

-Need to be more active in water quality/quantity issues - 184, 270

-WDFW must aggressively intervene in all FERC re-licensing actions - 156

-WDFW should acknowledge and participate in Watershed analysis - 72

-WDFW should be more involved with agricultural groups, landowners, extension agents, etc. - 409

Response: Comments noted.

Suggested Legislative Changes for WDFW

428 **Comments:**

-Legislative changes:

-Extend authority of HPA above the ordinary high water mark - 61

-Extend authority of WDFW over other state, county and local district actions that affect fish. - 94, 193, 355

-Revise HPA program to use watershed approach rather than project by project mode, the cumulative effect of individual projects is contributing to habitat loss - 197

-Move administration of HPA on forest lands to DNR, allocate WDFW time to technical assistance/evaluation - 323

Response: Comments noted.

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429 **Comments:**

-Funding

-WSP requires substantial and continuous funding - 202, 246, 267

-Key component for successful implementation is funding for habitat restoration projects and stream maintenance - 107

-Program funds should not be diverted to improve habitat- 159, 255

-Habitat restoration should be funded by those who destroy it - 159

-WDFW should do everything within its budgetary limitations to preserve and enhance habitat - 175, 221

-Need more volunteers, better structure and monitoring of volunteer groups - 186, 249

-Regional enhancement groups need to concentrate on habitat - 267, 355

-Regional enhancement groups need stable source of funding - 384

-Divert funding from hatcheries to habitat protection and restoration - 166, 187, 188, 192, 253, 257

-Need legislative funding to conduct research on how to reduce impervious surfaces, use of permeable paving materials - 165

-Need more staff to review/enforce water permits - 251

Response: Comments noted.

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430 **Comments:**

-Incentives

-Conservation easements and other tax incentives, technical assistance, recognition should be provided to help maintain and restore habitat, including riparian buffer retention, water conservation - 7, 25, 28, 44, 109, 186, 189, 197, 202, 203, 287, 303, 307, 311, 328, 330, 349, 350, 355, 376, 389, 391, 437

-Incentives for forest landowners could include returning the capitol gains advantage for rotations exceeding fifty years, eliminating forest excise tax, issuing DNR permits on ten-year intervals, presenting monetary awards for forests containing late successional habitat characteristics - 147
-Need more assistance and incentives such as USDAs Conservation Reserve and Wetland Reserve, property tax relief, and Jobs for the Environment/Washington Conservation Corps for providing fish and wildlife habitat while maintaining agricultural land base - 41, 107
-Concept of managing riparian zones through agricultural lands for forest products should be considered as an incentive to provide buffers, should be ensured of right to selectively harvest from riparian buffer - 107
-Should be community-based and long-term (20-50 yrs) - 197

Response: Comments noted. The policy generally supports the concept of incentives but the specific incentive measures would be developed during the watershed planning process

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431 **Comments:**
-Education
-Need to emphasize media/public education element of the policy - 13, 16, 47, 73, 94, 202, 131, 146, 236, 237, 293, 303, 315, 316, 324, 328, 330, 355, 368, 389
-Recommend Oregon model using state fish biologists participate using "Stream Scene." - 7
-Need legislation that supports environmental education - 187

Response: We agree.

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432 **Comments:**
-Monitoring/Evaluation
- Monitoring and evaluation should be addressed in a separate appendix and incorporated into a discussion of monitoring and evaluation among the alternatives, include adaptive management, and strategy for using M&E to inform policy and management of salmonids - 132
-Need time series on population/habitat by ecoregion in order to measure the effect of WSP, need reference populations by ESU, GCMUs and/or ecoregions, long term commitment to data collection - 132, 159
-Need to ensure monitoring is a strong component of the WSP, too often set aside because of funding priorities - 139, 146, 241, 269, 321, 359

Response: A monitoring plan must be included in implementation plans and watershed plans.

Other Legislation and/or Rule Changes

433 **Comments:**
-Riparian owners who affect directly or indirectly affect stream habitat should be considered a steward of that stream, should take a direct role in recovering stream or be taxed according to the scale of usage (not just timber and agriculture - everyone) - 58, 363
-Rules for habitat protection need to be site specific - 80

-Less roads in watersheds - 204
-Less intrusive on private property rights - 36, 213
-Protection of riparian areas, need wider riparian buffers - 184, 204, 251
-Need stringent rules with meaningful fines to prevent all who affect habitat from perpetuating further damage - 215
-Rules should be reduced from the present levels - 413
-No need for additional regulations:
    -Enough on books now - 57, 301
    -Not enough state resources available to provide uniform enforcement - 9
    -Need someone with common sense - 31
    -Treat landowner fairly, consistently, reasonably and with respect, gain his trust, get agreement on unified approach, protect his property rights, involve landowner in process - 9, 49, 92, 111, 210, 212, 368
    -Work on the ground for incremental improvement where improvement is needed - 9
    -Rely on Conservation Districts to protect habitat -114
    -Employ voluntary best management practices, evaluate, adopt regulations if no protection - 16
    -None that will adversely affect landowners - 195
    -Expensive and counterproductive - 226

Response: Comments noted.

Alternative Summary Matrix

	Current Approach - Alternative 1	Alternative 2	**Alternative 3**	Alternative 4	Alternative 5
1. Spawning Escapement Policy	MSY is the intent for primary populations. No specific management intent for other populations.	Full utilization of habitat	**Abundant utilization of habitat. Maintain or increase number of stocks, diversity, ecological processes. Provide surplus production for harvest and other benefits.** **The starting point is a best point estimate of MSY but two buffers would be added to account for risk to the resource due to (1) uncertainty in parameters of population dynamics and (2) a manager's ability to deliver fish to the spawning grounds. A manager could change to an alternative strategy if it is clearly more conservative (less risk to the resource) than the MSY approach.** **Wild fish release for resident fish and other approaches that can maintain high abundance.**	Management units would be managed to achieve MSY for the entire unit, however, individual stocks could be managed for levels down to 50% of MSY. Consider escapement needs to maintain ecosystem health.	Perpetuate each stock (maintain above level of immediate risk of permanent harm). Manage management units for spawner abundance levels that maximize long-term harvest levels from the wild fish; except where greater overall short-term benefits from the salmonid resource within the management unit can be obtained by managing for a different objective.
Target level for policy	Varies with species and location (stocks, management units, statewide)- nothing formal.	Stocks	**Stocks, with specific guidance to prevent creation of impossible fishery management situations.**	Management Units - fine scale	Management Units - greater aggregation
2. What Counts?	Varies by species (salmon - all spawners, steelhead - wild fish only) - nothing formal	Fish whose parents spawned in the wild or hatchery fish that are part of a formal supplementation program.	**Fish whose parents spawned in the wild or hatchery fish that are part of a formal supplementation program. Exceptions may be made for hatchery fish that meet three specific criteria.**	Same as Alternative 3.	All spawners in the wild without qualification.
3. Monitoring	Nothing formal	Every stock, every two years	**Every stock, every two years. Surrogate measures and index stocks may be used.**	Every stock, every five years. Surrogate measures and index stocks may be used.	Same as Alternative 4.

	Current Approach - Alternative 1	Alternative 2	**Alternative 3**	Alternative 4	Alternative 5
4. Accountability	Nothing formal	Same as Alternative 3.	**If stock fails to meet desired level three consecutive years or ≤80% for five year average, develop a plan and take all necessary steps.**	If management units fail to meet desired level three consecutive years or ≤80% for five year average, develop a plan and take all necessary steps.	Same as Alternative 4.
5. Genetic Conservation	Nothing formal	Same as Alternative 3	**Specifies general requirements for genetic conservation so that conditions would be created that allow natural patterns of genetic diversity and local adaptation to occur and evolve.**	Same as Alternative 3 except for minimum stock size and gene flow criteria.	Components take a completely different approach (see below).
6. Minimum Genetic Standard	Nothing formal	Same as Alternative 3 except for full utilization of habitat.	**Greater of 3,000 fish base or abundant utilization of habitat. A modified standard for inherently small stocks is also provided.**	2,000 fish base or level of long-term survival.	2.000 fish base or level of no immediate risk of permanent harm to the population.
7. Gene flow (human caused): between species within MALs, between stocks within GDUs	Transfer guidelines for salmon. Nothing formal for steelhead and resident salmonids.	Same as Alternative 3	**No gene flow allowable.**	Same as Alternative 3	Gene flow should not result in genetic extinction or any loss of life history forms.
allowable percent of total spawners that are hatchery fish (non-supplementation cases)	Northing formal	Same as Alternative 3	**≤1%, ≤5%, ≤10% (low, medium, high similarity)**	≤2%, ≤10%, ≤30% (low, medium, high similarity)	5-50% (non-native stock origin - native stock origin) threshold to determine high priority of assessment for action
definition of similarity	Nothing formal	Same as Alternative 3	**Strict**	Same as Alternative 3	Moderate
8. Effects of fishing practices on populations	Nothing formal	Manage fishery selectivity to maintain population characteristics similar to wild unfished populations.	**Manage fishery selectivity to maintain Pacific salmon population characteristics similar to wild unfished populations. For other salmonids, prevent any significant shift to sexual maturity at a smaller size and/or age.**	Manage fishery selectivity to maintain genetic variation in population characteristics for distribution similar to wild unfished populations.	Same as Alternative 4.

	Current Approach - Alternative 1	Alternative 2	**Alternative 3**	Alternative 4	Alternative 5
9. Habitat loss and fragmentation	Nothing formal	Same as Alternative 3.	**Habitat would be protected so that both the distribution and amount of habitat is sufficient to maintain local adaptation and genetic diversity.**	Nothing proposed	Nothing proposed
10. Sanctuaries and refuges	Nothing formal	Same as Alternative 3	**Would be established where populations can be protected from most of the effects of degraded habitat, harvest and hatchery influences.**	Nothing proposed	Nothing proposed
11. Ecological interactions	Nothing formal	Same as Alternative 3	**Maintain or restore diverse, abundant wild salmonid stocks at levels that naturally sustain ecosystem processes and diverse indigenous species and their habitats.**	Same as Alternative 3	Same as Alternative 3
		Same as Alternative 3	**Maintain healthy populations of indigenous species within levels that sustain or promote abundant wild salmonid populations and their habitats.**	Same as Alternative 3	Same as Alternative 3
		Control the numbers, varieties and distribution of non-indigenous species or stocks that compete with, prey on, or parasitize salmonids and other indigenous species <u>to avoid negative impacts</u>.	**Control the numbers, varieties and distribution of non-indigenous species or stocks that compete with, prey on, or parasitize salmonids and other indigenous species <u>to have no significant negative impacts</u>.**	Same as Alternative 3	Limit introductions or populations on non-indigenous species if ecological problems are demonstrated through monitoring and evaluation.
		Hatchery or other enhancement programs, either individually or when evaluated on a whole watershed basis, <u>would avoid negative impacts</u> on the health and abundance of wild salmonid or other indigenous populations due to predation or competition.	**Hatchery or other enhancement programs, either individually or when evaluated on a whole watershed bases, would <u>have no significant negative impacts</u> on the health and abundance of wild salmonid or other indigenous populations due to predation or competition.**	Same as Alternative 3	Limit or control hatchery production if ecological problems are demonstrated through monitoring and evaluation.
12. Harvest Management	Manage primarily in response to spawner abundance goals. Varies by species and location.	Same as Alternative 3 except for second buffer described in spawning escapement policy.	**Manage harvest to meet whatever spawner abundance and genetic conservation elements are**	Same as Alternative 3 except for second buffer described in spawning escapement policy.	Same as Alternative 3 except for second buffer described in spawning escapement policy.

	Current Approach - Alternative 1	Alternative 2	**Alternative 3**	Alternative 4	Alternative 5
			chosen.		
			Harvest would be managed in response to annual fluctuations in abundance of salmonid populations.		
	Harvest management will meet treaty requirements for sharing of harvest opportunity	Same as Alternative 1	**Same as Alternative 1.**	Same as Alternative 1.	Same as Alternative 1.
13 Incidental harvests (limits to harvest of a population when it is below the desired spawner abundance level)	Varies by species and location - nothing formal	≤5% of the Washington stock abundance in Washington fisheries.	**≤10% of the Washington stock abundance in Washington fisheries, measured in adult equivalents.**	Same as Alternative 3	Determined on a case-by-case basis.
14. Selective fisheries	Nothing formal - technique is commonly used.	Same as Alternative 3	**Non-treaty fishery priority would be given to those fisheries that can minimize their impacts on the weak stocks either by (1) using gears that can selectively capture and release stocks with minimal mortality, or (2) avoiding impacts by eliminating encounters with weak populations (e.g., proven time, area, and/or gear restrictions).**	Same as Alternative 3	Selective fisheries are a tool that can be used as necessary to provide greater harvest opportunity.
15. Cultured production/hatcheries	Varies by species and management criteria for population.	Same as Alternative 3	**Meet criteria under whatever genetic conservation and ecological interactions options are chosen.**	Same as Alternative 3	Same as Alternative 3
	Meet criteria in *Salmonid Disease Control Policy of the Fisheries Co-Managers of Washington State.*	Same as Alternative 1	**Same as Alternative 1**	Same as Alternative 1	Same as Alternative 1
		Hatchery programs would only be used where they can be expected to have a high probability of avoiding negative impacts to wild populations.	**Hatchery programs would only be used where they have high probability of having no significant negative impacts on wild populations.**	Same as Alternative 3	Same as Alternative 3

	Current Approach - Alternative 1	Alternative 2	**Alternative 3**	Alternative 4	Alternative 5
15. Cultured production/ hatcheries (cont.)		Same as Alternative 3	**Each hatchery program would be based on a complete operational plan that describes the specific operational components, measures to control risk, monitoring and evaluation, and performance audits.** **All hatchery-origin anadromous salmonids would be adipose-marked except for certain exemptions made on a case-by-case basis. Resident fish planted in streams would be marked as would some lake and reservoir plants.**	Same as Alternative 3	Same as Alternative 3
16. Supplementation	Nothing formal	Where a stock is well below desired level and cannot rebuild itself or is being reintroduced, and the risks of potential stock loss through extinction are greater than the genetic risks due to gene flow and the supplementation process.	**Where a stock is well below desired level and cannot rebuild itself or is being reintroduced, and the risks of potential stock loss through extinction are greater than the genetic risks due to gene flow and the supplementation process. Supplementation may also be an appropriate tool for rebuilding locally adapted stocks in areas where past harvest management and hatchery objectives have significantly impacted diversity and abundance. Some exceptions may also be made for use in mitigation programs if sustainable habitat capacity is limited.**	Same as Alternative 3 except that hatchery broodstocks can also be used to augment seeding or population abundance limited by environmental constraints or overfishing, consistent with gene flow constraints.	Desired outcome of all hatchery programs using locally collected broodstock.
17. Gene banking	Nothing formal	Same as Alternative 3	**Only where the natural environment cannot sustain a population, and only until these factors can be corrected.**	Same as Alternative 3.	Same as Alternative 3.

	Current Approach - Alternative 1	Alternative 2	**Alternative 3**	Alternative 4	Alternative 5
18. Implementation framework for spawning escapement management	Nothing formal	Nothing proposed	**Basic implementation approaches are described for use in four types of fish population management situations.**	Nothing proposed	Nothing proposed

	Alternative 1 Current Approaches	Alternative 2 Regulatory Emphasis	**Alternative 3** **Watershed Emphasis**	Alternative 4 Regulatory Emphasis	Alternative 5 Operating Principles
HABITAT					
Implementation Approach	Existing WDFW habitat policies and regulatory and proprietary authority. MOUs with various tribes, federal, state and local agencies. Other federal, state, local and tribal proprietary and regulatory authority.	State-prescribed performance standards. Action strategies with emphasis on locally-based watershed planning, regulatory presence clearly included.	**Performance measures. Action strategies with clear emphasis on locally-based watershed planning, regulatory presence included as well as state level processes such as TFW.**	Performance standards. Action strategies with blend of locally-based watershed planning and clearly defined regulatory defaults.	Narrative habitat sub-goals and performance measures. Representative action strategies. Locally based implementation planning coupled with some state-level regulatory changes.
Performance Standards/ Measures	Occur in an incomplete and uncoordinated fashion in existing laws, regulations, policies, procedures and publications.	Mixture of quantitative and narrative standards, including specific riparian/wetland buffer standards, fish passage and screening survival standards, etc. Generally inflexible to modification.	**Stated as "best available science." Mixture of quantitative and narrative standards, including specific riparian/wetland buffer standards, fish passage and screening survival standards, etc. Fairly inflexible to modify at local level.**	Stated as "best available science." Mixture of quantitative and narrative standards, including specific riparian/wetland buffer standards, fish passage and screening survival standards, etc. Fairly inflexible to modification at local level.	Narrative life history and habitat requirements within WSP.
Determination of Desired Future Considerations	Variety of negotiating forums. No agreement.	Fish and Wildlife Commission	**Watershed planning groups.**	Local watershed planning groups, Fish and Wildlife Commission.	Watershed planning groups, state agencies.
Action Strategies	Occur in an incomplete and uncoordinated fashion in existing laws, regulations, policies, procedures, publications, and plans. Variety of local planning and coordination efforts beginning.	Presented as actions which will be taken. Inflexible to modification.	**Suggested as tools to achieve measures, but more flexible regarding local innovation. Suggests review/revision of most environmental statutes to benefit salmonids.**	Stated as what needs to occur. Somewhat inflexible regarding local modification. More stress on enforcement of existing regulations and on the need for additional specific legislation/ rule making.	Presented as representative actions to be considered. Relies on local planning for most action strategies. Statewide collaborative processes for some issues.