



**STATE OF WASHINGTON**  
**RECREATION AND CONSERVATION OFFICE**

October 8, 2020

Mr. Larry Carpenter, Chair  
Washington Fish and Wildlife Commission  
PO Box 43200  
Olympia, WA 98504-3200

Dear Mr. Carpenter:

Subject: Comments on Proposed August 1, 2020 Update to Hatchery Policy C-3619

I am writing on behalf of the Governor's Salmon Recovery Office (GSRO). The role of the GSRO is to work with state agencies, regional salmon recovery organizations, and other partners to ensure a coordinated and consistent statewide approach to salmon recovery. Given the statewide importance of hatchery reform to salmon recovery and the intersection of our agency authorities and interests, we offer the following comments on the proposed Hatchery Policy C-3619 update.

The GSRO requests that WDFW ensure the policy is in alignment with the Statewide Salmon Recovery Strategy: Extinction is not an Option and the federally adopted Salmon Recovery Plans and regional sustainability plans. Salmon and Southern Resident Orcas require that Washington State continues to make progress on recovery. Washington's regional salmon recovery organizations have worked diligently with a multitude of partners, including WDFW and other state agencies, federal agencies, Tribes, local governments, and a variety of stakeholders, to develop adopted Salmon Recovery Plans and related regional sustainability plans that take all of these factors into consideration. These plans form the foundation for salmon recovery efforts across the state and represent a commitment from a multitude of partners to work together to recover salmon and steelhead to healthy and harvestable levels. The WDFW Hatchery Policy needs to be consistent with the statewide strategy and regional recovery plans.

GSRO requests that the following language be reinserted back into the new policy. This language was included in the original policy but has been removed from the new draft policy update. *"The intent of hatchery reform is to improve hatchery effectiveness, ensure compatibility between hatchery production and salmon recovery plans and rebuilding programs, and support sustainable fisheries."*

In addition, the GSRO requests that Section 3 of the HGMP Table of Contents (Relationship of Program to Other Management Objectives) be revised to include: *"3.6, Relationship to existing state and federally adopted recovery plans and regional sustainability plans, and associated*



*goals, objectives, targets, measures and actions. Explain any proposed deviations from the plan(s).*” The GSRO appreciates the emphasis in the new policy on recovery and conservation of salmon and steelhead, and the use of general references to conservation such as “regionally accepted policies,” “habitat protection and recovery strategies,” and “other management plans.” However, these general references lack a direct policy commitment to aligning hatchery production with state and federally adopted recovery plans and rebuilding programs that were the cornerstone of the previous policy.

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Finally, the GSRO encourages the Fish and Wildlife Commission to engage directly with the statutorily recognized Regional Salmon Recovery Organizations. There are seven of these organizations located across the state, each working closely with agencies, tribes, and other partners to implement salmon recovery. Increasing direct communication with the recovery organizations will strengthen individual partnerships with WDFW and will also help to achieve our shared and mutually beneficial goal of salmon recovery in Washington.

Thank you for the opportunity to provide these comments. If you have any questions or would like to discuss them in more detail, please feel free to contact me at (360) 628-2548, or via email at [erik.neatherlin@gsro.wa.gov](mailto:erik.neatherlin@gsro.wa.gov)

Sincerely,



Erik Neatherlin  
Executive Coordinator, Governor’s Salmon Recovery Office

cc: Kelly Susewind, Director, WDFW  
Washington Fish and Wildlife Commission  
JT Austin, Governor’s Policy Office  
Council of Regions