



Snohomish Basin Salmon Recovery Technical Committee

Attn: David Price
National Marine Fisheries Service
510 Desmond Drive SE
Lacey, WA 98503

March 27, 2019

Dear Mr. Price,

Thank you for the opportunity to provide comments for the Proposed Steelhead Recovery Plan for the Puget Sound Steelhead DPS (henceforth, Steelhead Plan).

The Snohomish Basin Salmon Recovery Technical Committee (SBSRTC) is made up of technical professionals from federal, tribal, state and local government agencies and non-governmental organizations partnering for salmon recovery in the Snohomish Basin. The SBSRTC is a venue for information sharing between organizations and is tasked with implementation and effectiveness monitoring of the Snohomish River Basin Salmon Conservation Plan. The SBSRTC also provides support to the Snohomish Basin Salmon Recovery Forum as they oversee implementation and adaptive management of the Salmon Plan. These comments were compiled from individual members of the SBSRTC and reviewed and approved by the committee and its co-chairs.

Steelhead Plan Framework and reliance on voluntary implementation

- A common theme from SBSRTC members' comments centered on the overall tone and lack of detail in the Steelhead Plan. While this document presents a reasonable framework of appropriate strategies it lacks specific goals, targets and associated timeframes that are necessary for implementers to prioritize efforts for steelhead recovery. This leads to questions about NMFS's expectations for a salmon recovery community that is already stretched thin and lagging behind Chinook recovery targets due to many implementation barriers.
- Given the fact that the Chinook and other ongoing recovery efforts in Puget Sound have both commonalities and differences with needs for steelhead recovery, the Proposed Plan needs to provide more detail about how NOAA sees the Puget Sound Partnership and Lead Entities engaging with steelhead recovery actions. Specifically, the plan needs to identify steelhead-specific funding for watershed groups, identify NMFS staff who will support them, and include a schedule for planning and technical efforts for local watershed plans, implementation of the actions, monitoring and adaptive management, and reporting status back to NMFS. The schedule should acknowledge tribal treaty rights legal decisions and Puget Sound tribal documents, including Teaching of Our Ancestors – Tribal Habitat Strategy (2018) (Section 1.3.3, Relationship to Other Recovery Efforts and Section 1.4).
- The Proposed Plan is lacking many details on implementation. The overarching strategic approach (Section 2 – Recovery Goals and Overarching Strategic Approach) does not acknowledge that current

efforts to recover Chinook are understaffed and underfunded, and southern resident killer whales are starving because there aren't enough Chinook. We would like to see the Steelhead Plan:

- quantify the amount of additional federal funding needed and recommend it be allocated to Puget Sound recovery efforts, including funding for at least one full-time steelhead employee per WRIA;
 - provide specifics about how federal funding is proposed to be allocated for steelhead recovery; and
 - give recommendations for allocating state, regional and watershed salmon recovery funding in a way that does not compromise progress towards Chinook recovery, given that investments in Chinook recovery are underfunded and therefore not yet producing adequate results.
- There is no process in place to get commitments from government entities to implement the actions in Section 3.1, Recovery framework, Implementation Strategy or Appendix 4. NMFS should develop and implement a process for project partners to commit to the implementation, thereby providing more certainty for implementation.
 - Plan organization could use improvement. Please consider revising numbering/lettering schema to easily reference nested levels of strategies and actions. There are many good recommendations buried in appendices; there is a need to highlight this more because these are examples of the specific actions that can move listed steelhead toward recovery.
 - NMFS authority to influence local actions is understated in this document and its potential role as a regulator is not fully identified until pg. 117 of the steelhead plan. Their regulatory authority is defined as a “backstop” in case voluntary regulations and actions fall short. This is a far too passive role for the federal government to be playing. It was, after all, the possibility of federal regulation of “the hundreds or thousands of separate actions” that degrade Chinook habitat in the 1990’s that propelled governments and private enterprises alike to spend enormous amounts of time and capital to negotiate Chinook recovery plans. Without the stick of regulation to encourage voluntary participation, there will need to be much more federal commitment to providing carrots. This plan needs more assurances on both fronts to be successful.

Strategies to Address the Effects of Dams

- Fish passage issues occur at more locations than just major dams. Small streams often have private dams for stock watering and recreation/aesthetics. Culverts are mentioned, but flap gates/tide gates weirs and fences can also create barriers to fish passage. These should also be a priority for removal through incentives or enforcement of take liabilities and penalties.

Strategies and Actions to Improve Floodplain Connectivity and Condition

- The SBSRTC feels that more federal involvement, through identification of clear habitat targets, site-specific planning and increased funding, is the only way to promote and incentivize restoration in

floodplains. The Steelhead Plan in its current form restates the need for floodplain restoration but accompanying inexplicit strategies and actions provided are largely redundant of Chinook plans and do not provide any additional information or support to move the needle toward recovery.

- Chinook Plan implementation has realized many habitat gains that benefit Chinook and steelhead since Plan adoption but the Snohomish Basin still lags behind implementation targets in the most difficult areas of action. Improving floodplain connectivity and condition has been particularly difficult as competing interests continue to hamper recovery actions. The Steelhead Plan identifies pressures imposed by development and agriculture in floodplains and specifically acknowledges efforts being undertaken in the Snohomish Basin to collaborate with the agricultural community to make progress toward mutual benefit in floodplains (pg. 66). The SBSRTC supports and participates in these multi-benefit conversations but realizes that, to date, they have resulted in few large floodplain restoration projects, especially on private lands. This is a key area for NMFS to provide site-specific guidance, funding and, if necessary, regulatory pressure to insure the most important projects move forward.

Strategies to Address Effects of Timber Management

- Strategy 5 “Improve accuracy of water type classification to ensure steelhead habitats.” is incomplete. Add “are protected” to the end of the sentence.
- The water typing strategy should also be included under “Strategies to Address Effects of Residential, Commercial and Industrial Development.” As it stands now, local government regulations around water typing are not well coordinated, and WA DNR only addresses water typing in forestry areas. It is a major, largely unrecognized problem that needs to be addressed, likely through clarifying and reinforcing existing state and local codes.
- This strategy should include language along the lines of, “Reduce road network density, increase road decommissioning, improve road construction methods to protect hydrology.”

Strategies to Reduce Early Marine Mortality and Predation

- The SBSRTC appreciates the work by Long Live the Kings and supporting work groups and committees. Low early marine survival appears to be a major limiter of steelhead populations and must be addressed with state, federal and tribal cooperation as early as possible. There are many proposed strategies and actions and likely only capacity to implement a few at most. We recommend prioritizing those with the highest likelihood of contributing to recovery as those with lower likelihood of contributing to recovery are tested over time.

Strategies and Actions to Reduce Pressures on Natural Origin Fish

- We believe it is essential that this section of the plan have a “freshwater mortality” component in addition to mortality in “estuary and marine” waters. “Strategies to Reduce Harvest Pressures on

Natural-Origin Fish” should include recognition of the multiple life history strategies of steelhead and life history plasticity such that resident steelhead and pre-migration juveniles are protected from harvest pressures, e.g. “Release wild ‘trout’” and selective gear regulations. Local biologists have observed a high rate of harvest on freshwater steelhead smolts and kelts during the summer sport fishery on the Skykomish River.

Additional General Comments and Document Errors or Omissions

- The SBSRTC is glad to see some recommendations for protection of steelhead habitat come directly from the Snohomish Basin Protection Plan (SBPP). The SBPP is mentioned as a source for strategies and actions in tables in Appendix 4. We did notice that the document is not cited or referenced in the main plan document and hope this will be corrected in the final document.
- Under the Lead Entities paragraph on pg. 37, basins with steelhead strategies/chapters are listed. The Snohomish River Basin Salmon Conservation Plan, though focused on Chinook, is a multi-species plan with strategies that cover the entire basin from nearshore to headwaters. While steelhead were not a focus species, many recommended strategies and actions benefit all salmonids and are represented in this Steelhead Plan.
- We agree that steelhead population monitoring and adaptive management are crucial to recovery. Currently monitoring is underfunded and needs to be increased, especially to adequately characterize the plastic life-history of steelhead. Co-managers in the Snohomish conduct spawner and out-migration monitoring but there are large areas, important to steelhead, where no or very limited data are collected. Cost estimates for steelhead monitoring should be increased from one percent to at least five percent (pg. 133).
- The SF Skykomish is ESA listed critical habitat (81 FR 9251, pg. 9314) that supports a self-sustaining mixed wild/Skamania origin summer run population propagated by exclusively natural origin spawners. The Washington Department of Fish and Wildlife operated trap and haul on the SF Skykomish at Sunset falls is an important part of salmon and steelhead recovery in the Snohomish Basin. Maps on pg.14 (Figure ES-1) and pg. 25 (Figure 1) do not show the WDFW trap and haul facility. Additionally on pg. 59 The SF Skykomish is symbolized as “Artificial” when it should more appropriately be displayed as “Trap and Haul”
- Page. 15 and 28 state that “Winter run steelhead return from the ocean in the fall and typically spawn within a few weeks”. This statement oversimplifies the variability of steelhead run timing. Winter run steelhead return from the ocean in the late winter/early spring and can typically spawn through June (Myers, J.M., et al. 2015). Basin biologists have observed winter run steelhead spawning as late as early July on the Sultan River.
- On pg. 61 (Table 2) there are two dams on the Sultan River that appear to be combined in the table. Culmback Dam (RM 15.8) is just upstream of a natural barrier. The City of Everett’s Diversion Dam occurs at RM 9.8. In 2016, volitional passage was created at this diversion dam and recent

monitoring shows salmon and steelhead accessing miles of additional habitat between it and Culmback. The “Dam Purpose” for the City of Everett Diversion Dam is “water supply”.

- On pg. 78, the first paragraph in reference to Skamania summer-run hatchery steelhead gene flow resulting in high levels of segregation....except where Skamania-origin steelhead have established natural populations from introduction above waterfalls in the Tolt River” is not quite accurate. There have been years of Skamania summer-run steelhead observed in the Tolt forks above canyons where native summer steelhead spawn, accessing the reaches on their own volition and not from introductions above waterfalls.
- Section 4.2.1 Viable Salmonid Populations emphasizes spatial structure and diversity. On pg. 98 the Steelhead Plan states: “Spatial structure influences the viability of steelhead because populations with restricted distribution and few spawning areas are at a higher risk of extinction as a result of catastrophic environmental events, such as a landslide, fires, floods, or droughts than are populations with more widespread and complex spatial structures.” On Pg. 103, 3) of the recovery plan there is a list of characteristics associated with a viable MPG which focuses on major diversity and spatial structure. When considering how few (only five) summer run steelhead populations are found in the North Cascades MPG and all these summer run populations are isolated, utilizing small segments of rivers for spawning it seems to be taking too great of a risk to make choices between one population over another. In the Snohomish Basin, both the Tolt and the NF Skykomish summer run steelhead need equal consideration and protection.

Thank you again for the opportunity to provide these comments. The SBSRTC looks forward to working with NOAA Fisheries to add important details to this plan and develop watershed-specific actions and an approach to prioritize actions and increased recovery funding.

Sincerely,



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SBSRTC Co-chair



Beth leDoux
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