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Dear Sirs:

I would like to start by thanking you for your detailed response to our concerns and reiterate that we have the utmost respect for the Yakama nation's fishing rights and their commitment to salmon recovery. We are, however, concerned that the impact of hatchery programs in the Klickitat Basin remain inadequately addressed and that changes in the recent DEIS may compound problems for wild fish in the basin. Specifically problematic are plans to continue releasing substantial numbers of both coho and fall-Chinook into the Klickitat above Lyle falls, and to increase hatchery releases for both summer steelhead and spring Chinook through integrated programs which will require taking a significant portion of the returning wild fish into captivity.

Documented introgression between non-native fall and native spring Chinook constitutes an existential threat to that fragile native population. Our concern is that the DEIS calls for the continued release four million fall Chinook smolts into the Klickitat, albeit at a downstream location, and does not specify a plan to eliminate gene flow between fall and spring Chinook. We understand that the fall Chinook program provides valuable harvest opportunities guaranteed by *US v. Oregon*. However, passing adult fall Chinook above Lyle falls is not essential to meeting that obligation and poses an undue threat to the fragile spring Chinook population.

The Lyle falls fish trap provides a unique opportunity to meet the production goals for fish in the basin while simultaneously protecting the genetic integrity and productivity of native fish by removing hatchery fish from the upriver population.

Similarly, the current ratio of hatchery to wild steelhead in the Klickitat is contradictory to the scientifically robust principles of the HSRG and the continued release of Skamania Hatchery summer steelhead into the Klickitat for fishery augmentation creates a persistent threat to the health and productivity of the wild Klickitat summer steelhead. The release of these fish should be discontinued in order to recover the ESA-listed wild native summer steelhead of the Klickitat River.

With regards to the proposed integrated hatchery programs for spring Chinook and summer steelhead, both wild stocks are sufficiently abundant to recover without hatchery intervention. While the DEIS is not specific about the number of adults required to meet hatchery production goals, it is apparent that most, if not all, of the current spring Chinook population would be needed to meet these objectives. This is contrary to HSRG recommended hatchery practices and inconsistent with the stated goal of recovering the fragile spring Chinook population. The same concerns exist for summer steelhead. While there is an unfortunate lack of information about the abundance of wild fish in the basin, taking a significant portion of an ESA listed population into captivity is scientifically unjustified and will only depress the productivity of the wild stocks.

In summary, any recovery plan seeking to rebuild wild stocks to a level which can sustain harvest should rely first and foremost on the wild fish themselves. While we recognize and respect the treaty rights of the Yakama Nation, our concern is that programs be conducted consistent with the latest science and in a way that increases salmon abundance without decreasing the productivity of the wild salmon-sustaining ecosystem.

We thank you for your response and we look forward to further correspondence.

Sincerely,

Will Atlas

Chair; FFF Steelhead Committee