



January 15, 2021

Emi Melton
National Marine Fisheries Service
West Coast Regional Office
1201 NE Lloyd Blvd., Suite 1100
Portland, OR 97232
Via electronic mail to: hatcheries.public.comment@noaa.gov

Dear Ms. Melton

On behalf of the Northwest Sportfishing Industry Association (NSIA), I am writing in support of the proposed evaluation and pending determination (PEPD) and associated hatchery and genetic management plan (HGMP) for the Skykomish River hatchery summer steelhead program.

The Northwest Sportfishing Industry Association was founded in 1993 and represents business interests primarily in Washington and Oregon that depend on the sport of fishing for their livelihoods. NSIA and its members are dedicated to the preservation, restoration, and enhancement of sport fisheries and are leaders in salmon and steelhead recovery efforts in the Pacific Northwest. We appreciate this opportunity to comment on the PEPD and HGMP.

For decades, the Skykomish summer steelhead hatchery program has been a mainstay of recreational steelhead angling in the Puget Sound region. Each summer and through the fall, this tremendously popular program provides thousands of anglers a quality recreational angling experience *in close proximity to* the greater Seattle-Tacoma-Everett metropolitan area. Recreational harvest has averaged over 2000 summer steelhead annually, and the program generates significant economic benefits, especially for the north Puget Sound sportfishing industry and various other businesses located in the basin and throughout the region. Steelhead fisheries are a critical part of the sportfishing industry economic portfolio, providing opportunity at times when other fisheries are off line and frequently, they present an opportunity to catch a fish for anglers who do not own a boat. We have found that even small, boutique-style fisheries generate enthusiasm and bring license buying customers into our stores and into guide boats, local hotels and restaurants.

At the urging of the National Marine Fisheries Service (NMFS), and to resolve potential anti-hatchery litigation, the Washington Department of Fish and Wildlife (WDFW) discontinued using out-of-basin, Skamania-origin hatchery stock in this program due to concerns about impacts to ESA-listed natural-origin steelhead. In its place, the agency along with tribal co-managers now seek approval of a new hatchery program founded with wild summer steelhead broodstock from the South Fork of the Skykomish River.

The proposal will have many benefits. The use of within-basin, wild broodstock will reduce risks to natural origin winter and summer steelhead as compared to use of the Skamania stock. The program is also designed to aid conservation of natural-origin North Fork Skykomish summer steelhead by using excess returns to boost the demographics and recovery of that population. Many of our customers also insist that local broodstock programs provide a better fishery than those generated by 'washed out' out of basin stocks. And of great significance to our industry and our customers, the proposal will allow the continuation of a vital and popular summer steelhead recreational fishery on the Skykomish River. Indeed, given the drastic cuts in other steelhead hatchery programs, it is not an overstatement to say that without approval of this modestly-sized hatchery program, summer steelhead angling in the north Puget Sound will be tragically lost, perhaps permanently.

In supporting this proposal, NSIA is familiar with other successful wild steelhead broodstock hatchery programs throughout the Northwest, and we commend WDFW and the Tulalip Tribes for offering this innovative path forward. The co-manager's HGMP includes a detailed and thoughtful evaluation of the program that fully addresses and satisfies NMFS's criteria for hatchery programs. And NMFS's PEPD rightly concludes this program will not impede recovery of ESA-listed natural-origin steelhead and salmon populations in the Snohomish River Basin, while providing demographic and genetic benefits to the North Fork Skykomish summer steelhead population. Accordingly, NSIA urges NMFS to approve this program as soon as possible.

Thank you for considering our comments. Please don't hesitate to reach out with any questions you may have or if we can assist with this process in any way.

In Service,

A handwritten signature in blue ink that reads "Liz Hamilton". The signature is written in a cursive, flowing style.

Liz Hamilton, Executive Director
Northwest Sportfishing Industry Association