Seattle City Light
Seattle Public Utilities

March 28, 2019

David Price, Puget Sound Steelhead Recovery Coordinator
National Marine Fisheries Service
510 Desmond Drive SE
LACEY, WA 98503

Dear Mr. Price,

Thank you for the opportunity to provide comments for the Draft Steelhead Recovery Plan for the Puget Sound Steelhead DPS (henceforth, "Plan"). Seattle City Light (City Light) and Seattle Public Utilities (SPU) are active stakeholders in both the Northern Cascades, Central and South Puget Sound MPGs that focus on salmon and steelhead recovery, working collaboratively to protect and restore aquatic ecosystems, including purchase of strategic land parcels for protection of important habitats. The City's water management strategies, funding and implementation of research, restoration projects and monitoring are vital to the ongoing understanding and protection of anadromous salmonids and aquatic habitat, which has had a focus on steelhead.

WRIA Technical Committee Comments

- We are aware of the numerous comments to date that address the Plan's lack of specificity. We also recognize the Plan's lack of a specific timeline for recovery and for reaching specific goals and targets. Without milestones and timetables for implementation or cessation of programs, there is no concrete plan to follow for actions to move stocks to recovery.

General Comments

- Section 4.2.1 Viable Salmonid Populations emphasizes spatial structure and diversity. On Page 98, the 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 Page 103 of the Plan, there is a list of characteristics associated with a viable MPG which focuses on major diversity and spatial structure. There are only a handful of summer steelhead populations in Puget Sound, and these are a unique and highly threatened life history form. Summer steelhead are important to maintaining the spatial, genetic, and life history diversity of Puget Sound steelhead (i.e., three of four VSP factors). Protecting all remaining summer steelhead populations is important since they are both genetically distinct and spatially isolated. Summer steelhead populations are vulnerable to local extinction from catastrophic events such as landslides,

because their populations are confined to small areas (e.g., South Fork Tolt River, Deer Creek). All populations should be targeted for recovery, not just a subset of them.

- The continued use of summer steelhead with Skamania genetics as a hatchery stock in the Snohomish Basin represents an ongoing threat to native summer steelhead populations due to continuing genetic introgression over time. Hatchery steelhead are well known for the ability to stray, and Skamania derived-fish stray into areas like the South Fork Tolt River where they continue to threaten native summer steelhead populations. The use of non-Puget Sound derived hatchery broodstock has been acknowledged as detrimental to recovery of native populations of steelhead in the Plan. There needs to be a timeline for ending this practice.

- Greater levels of protection should be provided to *Oncorhynchus mykiss* which are assumed to be "resident rainbow trout" in streams and rivers occupied by steelhead (i.e., anadromous zones). Many of these fish are often older juvenile steelhead (age 4 years and older) that resemble mature rainbow trout. Also, some steelhead may adopt a "resident" life history strategy. For example, precocious steelhead males which appear to be resident fish contribute to the productivity and life history diversity of the population. On the South Fork Tolt River, as part of City Light's ongoing summer steelhead life history study, we have detected steelhead as old as 6 years moving downstream. We are concerned that these fish could be mistaken for "resident rainbow trout" where fishing is permitted.

- Most of the lowland areas are where most of the 303d water quality degradation listings are located. Steelhead can use smaller streams than Chinook in these lowland areas, so the degradation of habitat in these streams that are not already a focus for Chinook salmon recovery need to be better addressed.

- Section 3.12 Integrating Research, Monitoring, and Evaluations, Strategy 1.b., Page 92, suggests the need to explore and expand alternative technologies for increasing accuracy and precision of adult abundance and life-stage specific survival estimates, including SONAR and PIT tagging. There is a missing element here. As more entities use PIT tags in Puget Sound, a database needs to be developed similar to the one developed for the Columbia River where any fish with a tag are documented and included in the database. In addition, anyone in Puget Sound that handles steelhead under a collection permit should be required to have a PIT tag reader when handling steelhead to collect their location, length, weight if a tag is detected. This information should then be incorporated into the shared database. Otherwise, there are many missed opportunities for key data collection.

Document Errors or Omissions

- On Page 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. This statement does not acknowledge that there is a wild summer steelhead population in the North and South Forks of the Tolt River. Furthermore, Skamania hatchery steelhead are observed annually in both of these Forks above their respective canyons where native summer steelhead spawn. These Skamania fish travel into these spawning reaches on their own and not from introductions above the waterfalls. Wild summer steelhead in both Forks of the Tolt River are documented as early as the 1920s before the introduction of Skamania summer-run steelhead were released in the Basin (McMillan, 2018).

- On Page 100, the 1-3 scale for individual DIPs described under the DIP viability discussion in the PSSTRT Viability Criteria document should be explained and included in the Plan as an Appendix.

- On Page 106, similar to the potential of overestimating steelhead abundance in small, independent streams using the Plans methods, it should be acknowledged that summer steelhead spawning in upper reaches with limited spawning are likely overestimated as well.

Document Definitions or Explanations

- Provide definitions to "negligible risk", "probability of persistence", "acceptable level of harvest", "degree of certainty."

- Under adaptive management process: "are efforts working according to expectations?" needs clarity.

- On Page 19 and the section starting on Page 80, and Appendix 4: Strategies to Reduce Negative Effects and Improve Conservation Benefits of Hatchery Program needs more explicit guidance. There are no metrics that clarify what it means to maximize benefits while minimizing risks to natural populations.

- On Page 100, MPG level viability needs clarification on how it is determined and why 50 % MPG is considered sufficient.

- On Page 107, Table 4. The habitat column needs a definition. Does the KM of habitat include both rearing and spawning habitat?

- As different WRIA's partake in watershed-specific recovery plan development that includes watershed-specific actions, how will they be adopted or incorporated into the regional plan? Please define the steps that will be taken to assure this can be done.

Again, Seattle City Light and Seattle Public Utilities appreciate the opportunity to comment on the Plan and look forward to participating in planning efforts and implementing projects that support the success of Puget Sound steelhead recovery.

If you have any questions about our comments, please contact us at Lynn.Best@seattle.gov or (206) 386-4586 or Paul.Faulds@seattle.gov or (206) 615-0021.

Sincerely,

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Water Resources Manager
Seattle Public Utilities

cc:

Green/Duwamish and Central Puget Sound Watershed Salmon Recovery Council
Lake Washington/Cedar/Sammamish Watershed Ecosystem Forum
Skagit Watershed Council
Snohomish Basin Salmon Recovery Forum
Tolt Fish Advisory Committee
Tolt Fish Habitat Restoration Group

Reference:

McMillan, B. 2018. Summer Steelhead of Western Washington (Puget Sound, Hood Canal, Strait of Juan de Fuca, West Coast, & Lowermost Columbia). The Conservation Angler. Edmonds, WA.