



Lake Washington/Cedar/Sammamish (WRIA 8) Watershed

201 S. Jackson Street, Suite 600
Seattle, WA 98104-3855

March 6, 2019

David Price
Puget Sound Steelhead Recovery Coordinator
National Marine Fisheries Service

Subject: Comments on Proposed Recovery Plan for Puget Sound Steelhead

Dear Mr. Price:

Thank you for the opportunity to review the proposed Puget Sound Steelhead Recovery Plan (Plan). The Lake Washington/Cedar/Sammamish Watershed (aka WRIA 8) Technical Committee is the science body overseeing the implementation of the technical components of the WRIA 8 Chinook Salmon Conservation Plan (WRIA 8 Plan). As such, we are responsible for recommending habitat goals and monitoring actions that will lead to the recovery of Chinook salmon in the watershed. The WRIA 8 Plan is approved by a policy oversight body consisting of elected officials from 28 local jurisdictions, as well as state and federal agencies, including NOAA, and non-profit organizations. Although Chinook salmon are our primary focus, many of our objectives are intended to benefit other salmon species, including steelhead.

In the creation of our watershed-based Chinook recovery plan, we followed the S.M.A.R.T. principle: setting goals that are specific, measurable, achievable, relevant, and time-bound. For example, the WRIA 8 Chinook Plan contains specific habitat actions and timelines (e.g., reconnect 130 acres of disconnected floodplain by 2025) and a list of priority projects that, if implemented, support achieving the goal. In our review of the proposed Steelhead Plan, we were disappointed to not see a similar S.M.A.R.T. watershed-based framework applied to the North Lake Washington and Cedar River steelhead populations. There are few site-specific actions identified in the Steelhead Plan, no clear identification of how additional specific actions will be identified in the future, and no clear identification of who would lead implementation of identified watershed-level actions. In fact, it is unclear how this plan will be implemented, other than relying on the existing 'good works' of other local salmon recovery plans, and existing efforts, which are not sufficient for recovery.

We appreciate that the Steelhead Plan does identify fish passage at the Hiram M. Chittenden (Ballard) Locks as an issue to address in support of recovery. WRIA 8 considers the Lake Washington Ship Canal to be a crucial bottleneck to the conservation and recovery of all anadromous species in the watershed. We welcome any efforts to improve passage for salmon and other native species through the facility, especially efforts to address lethal elevated temperatures and low dissolved oxygen conditions throughout the migratory corridor from Lake Washington to Puget Sound.

Price
Page 2 of 2
March 6, 2019

Regarding abundance goals for the North Lake Washington and Cedar River populations, it is unclear from the plan as written how NOAA expects to achieve those goals from the current population numbers. We would like to see more specific information on this subject included in the plan.

We also encourage NOAA to provide much more specific details regarding integrated Habitat, Harvest and Hatchery actions, including more watershed-level and site-specific management actions that are necessary to conserve the species, specific milestones, and a timetable for implementing those actions, identifying watershed-level entities responsible for engaging in those actions. In addition, while there is plenty of mention of the importance of monitoring and adaptive management, it seems to rely heavily on existing salmon recovery entities that are already overstressed and underfunded. As written, we have little confidence that this plan will recover the Puget Sound Steelhead Distinct Population Segment (DPS).

Thank you again for the opportunity to review the proposed Steelhead Recovery Plan. If you have questions about these comments or the implementation of the WRIA 8 Plan, please contact Jason Mulvihill-Kuntz, WRIA 8 Salmon Recovery Manager (jason.mulvihill-kuntz@kingcounty.gov).

Sincerely,



Scott Stolnack
WRIA 8 Technical Coordinator

Cc: Jason Mulvihill-Kuntz, WRIA 8 Salmon Recovery Manager
WRIA 8 Salmon Recovery Council members