



SIERRA CLUB MARIN GROUP

COASTAL SECTION

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C/O GORDON BENNETT

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November 5, 2003

California Department of Fish and Game Attn: Rob Floerke
7329 Silverado Trail Napa, CA 94558 Fax: (707) 944-5563

Dear Mr. Floerke

The Sierra Club urges the California Department of Fish and Game (CDF&G) NOT to re-introduce hatchery-raised coho into Walker Creek in Marin County, as currently proposed.

Three years ago, these fish were originally proposed to be removed from Olema Creek in Marin County to begin a new coho breeding project at the Warm Springs dam hatchery for the purpose of re-introducing coho into certain Russian River tributaries. Several Marin environmental groups engaged in coho recovery, including the Sierra Club, expressed our concerns about this proposed project when it was presented to us at a meeting of the Marin Municipal Water District's Lagunitas Technical Advisory Committee, on which a CDF&G representative (Bill Cox) sits. Due to the lack of notice to Marin environmental groups, and the very short time then-remaining in the late fall before the fish pools dried up, representatives from these environmental groups met with Mr. Dick Butler of NOAA Fisheries (then NMFS) to re-confirm specifics of the proposal, to present our concerns about it, and to request that NMFS not issue a permit for it

Mr. Butler re-confirmed that this conservation hatchery experiment was intended to lead to a possible re-introduction of subsequent generations of these original coho to Russian River tributaries, however, any re-introduction was to be contingent on the selective breeding of these subsequent generations to achieve the most appropriate genetic pattern for the recipient creeks. The Marin environmental groups expressed concerns not only about the coho hatchery project in general, but in particular about the possible disruptive genetic impacts from project strays or project returns on the native coho in the Tomales Bay watershed, which includes Lagunitas Creek, site of one of the most successful coho restoration projects in California, as well as Olema Creek, perhaps with the most long-term protections of any coho creek in California.

In response, NOAA Fisheries assured us that their federal permit for this experiment would require coho resulting from this program to be used only in the Russian River watershed and under no circumstances would these coho be returned to the Tomales Bay watershed. It was on the basis of that understanding that the Sierra Club chose not to obtain a restraining order that would have blocked the removal of the fish from Olema Creek three years ago.

In the intervening three years since that meeting and since the coho removal went forward, studies have lent support to our original concerns about the effectiveness and potential negative impacts from conservation hatchery re-introduction programs, which are still considered experimental. Furthermore, other studies have confirmed the delicate genetic differences between the different populations in each creek on this section of the California Coast, including those of the Tomales Bay watershed.

Consequently, it comes as a great surprise and disappointment that we have learned that several agencies, including yours, are engaged in a preliminary plan, again without notice to the Marin environmental groups engaged in salmon recovery, to re-introduce these same Olema fish for breeding purposes into Walker Creek in the Tomales Bay watershed. Consequently, we list the following concerns

- Tomales Bay is the same watershed these fish were removed from and the same watershed which, three years ago, we were assured they would not, under any circumstances, be returned to.
- These fish are not, as promised, the carefully genetically bred descendents of the original fish, but rather are the original fish themselves that have imprinted on Olema, and would likely return to Olema to breed, regardless of a possible release site in Walker.
- These fish represent a very small subset of the genetic variation in Olema Creek and, if re-introduced into the same watershed, could un-naturally skew its genetic balance, as noted by at the 10/31/03 Lagunitas TAC meeting by Professor Paul Siri, noted expert in coho genetics.
- There is inadequate evidence that the minor restoration accomplished on Walker Creek is adequate to support any breeding population of coho.
- Lastly, the Sierra Club regards this proposal not only as a breach of our understanding of three years ago, but also as violation of the California Environmental Quality Act (CEQA), should the project go forward. One of the most basic underlying reasons for CEQA is to “inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities” (CEQA Section 15002(a)1). In addition, Section 15378(a) defines “project” as “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonable foreseeable indirect physical change in the environment...” The Sierra Club believes that the proposed Walker Creek re-introduction of breed stock coho clearly will result in both direct and indirect physical changes to the environment. As such, the plan constitutes a “project” for CEQA purposes, yet CDF&G has conducted no CEQA analysis.

Studies are still being conducted on these “conservation hatchery” projects. These studies may yet show that in some cases, these projects can make valuable contributions in saving coho genetics. But they also carry great risks if they are not carefully planned, if the results are not carefully monitored, and if the risks to adjoining coho populations are not reduced to the extent reasonably possible. The Sierra Club maintains that none of these mitigating factors are present in the current Walker Creek proposal, nor has the required CEQA document been prepared. Consequently, the Sierra Club urges CDF&G not to take action and is prepared to take all legal and appropriate measures to block this project until a full CEQA analysis is complete.

Sincerely,

Gordon Bennett, Conservation Co-Chair