



SIERRA CLUB MARIN GROUP

COASTAL SECTION

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C/O GORDON BENNETT

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NOAA Fisheries Attn: Dick Butler
777 Sonoma Ave Santa Rosa CA 95404
Fax (707) 578-3435

Dear Mr. Butler

The Sierra Club urges NOAA Fisheries not to permit California Department of Fish and Game (CDF&G) to re-introduce hatchery-raised Olema Creek coho into Walker Creek

As you know, these fish were originally proposed to be removed three years ago from Olema Creek to a new coho breeding project at the Warm Springs dam hatchery. At the time, due to the lack of notice to Marin environmental groups engaged in fish recovery, and the very short time then-remaining in the late fall before the fish pools dried up, representatives from several environmental organizations, including the Sierra Club, met in your offices to confirm specifics of the proposal and to present our concerns about it.

You confirmed that this conservation hatchery experiment was intended to lead to a possible re-introduction of subsequent generations of these original coho to certain Russian River tributaries. However, any re-introduction was 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, you assured us that your agency would only permit coho resulting from this program to be used in the Russian River watershed and would not permit these coho to 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 our 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

- This is the same watershed these fish were removed from and the same watershed which, three years ago you assured us 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 NOAA Fisheries not to permit this proposed CDF&G 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