



Rob Jones  
Salmon Recovery Division  
National Marine Fisheries Service  
1201 NE Lloyd Blvd. Suite 1100  
Portland, OR 97232

October 13, 2009

RE: Wenatchee Summer Steelhead and Chiwawa River Spring Chinook HGMPs

Dear Mr. Jones:

Chelan County PUD (District) and the Washington Department of Fish and Wildlife (WDFW) are pleased to submit the attached Hatchery and Genetic Management Plans (HGMPs) for the Wenatchee Summer Steelhead and Chiwawa River Spring Chinook hatchery programs. These HGMPs have been prepared in response to NMFS's request for new HGMPs for the District's Steelhead and Spring Chinook Programs and are the product of over a year of hard work and productive collaboration on the part of the District and the members of the Hatchery Committees established pursuant to the District's Rocky Reach and Rock Island Habitat Conservation Plans (HCPs). Pursuant to Section 10(a)(1)(A) of the Endangered Species Act and 50 C.F.R. Part 222, the District and WDFW jointly submit this letter and the enclosed HGMPs to NMFS as applications for new Section 10 permits to span a new 10-year period.<sup>1</sup>

The enclosed HGMPs were officially approved by the HCP Hatchery Committees, of which NMFS is a member, on August 15, 2009 (NMFS abstained from voting on final approval of the plans at the August 15<sup>th</sup> Hatchery Committee meeting). As explained in the District's letter to NMFS dated August 21, 2009, the District and WDFW explored alternative approaches for developing formal permit application(s) relative to legal and/or regulatory responsibility for particular activities contained within the HGMPs. The District and WDFW have agreed on the following approach and collectively request that NMFS issue new Section 10 permits as follows<sup>2</sup>:

- A permit issued jointly to the District and WDFW, as co-permittees, that addresses only the operational and monitoring and evaluation (M&E) activities of the Wenatchee Summer Steelhead hatchery program that are associated with the District's HCP obligations and that are funded by the District. These activities are specifically described in Attachment 1 to this letter and in the Steelhead HGMP.
- A permit issued jointly to the District and WDFW, as co-permittees, that addresses only the operational and M&E activities of the Chiwawa River Spring Chinook hatchery program that are associated with the District's HCP obligations and that are funded by the District. These

<sup>1</sup> The steelhead program is currently operated under permit No. 1395 issued on October 2, 2003 and the spring Chinook program is currently operated permit No. 1196 issued on January 20, 2004.

<sup>2</sup> This requested permits, as outlined in this letter, are consistent with the structure and content of both of the HGMPs.

activities are specifically described in Attachment 1 to this letter and in the Spring Chinook HGMP.

- A permit issued solely to WDFW that addresses the management of returning hatchery steelhead adults excess to broodstock and recovery needs. The management actions include a recreational fishery and disposition of adults removed at Tumwater Dam. These activities, which are solely within the purview of the fishery managers and are not funded by the District or otherwise within the District's control, are specifically described in Attachment 1 to this letter and the Steelhead HGMP.
- A permit issued solely to WDFW related to management of returning Chiwawa Hatchery spring Chinook adults excess to broodstock and recovery needs. The management actions include a recreational fishery and disposition of adults removed at Tumwater Dam. These activities, which are solely within the purview of the fishery managers and are not funded by the District or otherwise within the District's control, are specifically described in Attachment 1 to this letter and in the Spring Chinook HGMP.
- A permit issued solely to WDFW related to other research activities for spring Chinook and steelhead that are outside the requirements of the District's HCPs. These activities not funded by the District or otherwise within the District's control, are specifically included in Attachment 1 and the Steelhead and Spring Chinook HGMPs.

For the permits issued jointly to the District and WDFW, we respectfully request that NMFS include language under Program Management and Operation Conditions, and wherever applicable, indicating that WDFW is the current operator under contract to the District but that the District may retain other hatchery and M&E contractors upon agreement by the Hatchery Committees, as provided by the terms of the HCPs.

Finally, as indicated in the District's August 21, 2009 letter, we understand that NMFS intends to treat this permit application as a new action, perform a superseding Section 7 consultation (during which time the District and WDFW's existing Section 10 permit coverage will remain effective), issue a biological opinion (BiOp) that is narrowly-focused and builds upon the existing ESA record, and issue new Section 10 permits as requested above. We appreciate NMFS's recognition that a new BiOp can and should be narrowly-focused, given the extensive and thorough existing record. In that light, the District intends to soon provide NMFS with additional detail on the narrow suite of items that may or should be covered in a new BiOp and we look forward to collaborating with NMFS on those issues.

Please let us know if you have any questions regarding this application for the permits detailed above. The District and WDFW are committed to carrying out the provisions of these HGMPs and helping in the recovery of the region's valuable resources.

Sincerely;



Heather Bartlett  
Hatcheries Division Manager -Fish Program  
Washington Department of Fish and Wildlife



Gregg Carrington  
Managing Director Energy Resources  
Chelan County Public Utility District