



# Alaska Trollers Association

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Mark Walker  
Director of Public Affairs  
Northwest Power & Conservation Council  
851 SW 6th Avenue, Suite 1100  
Portland, Oregon 97204-1348

Dear Mr. Walker:

The Alaska Trollers Association (ATA) welcomes the opportunity to comment on Northwest Power and Conservation Council's Artificial Production Review and Evaluation for the Columbia River Basin (APRE). ATA generally supports the goals of APRE, and we look forward to a constructive dialog on hatcheries and artificial production.

Our association is highly supportive of the chinook program in the lower Columbia, which, as the study rightly states, is the mainstay of the coastal and in-river commercial and recreational fisheries.

ATA does not agree with the conclusion APRE draws on farm salmon supplanting harvested salmon. Nor do we agree that the societal role of hatcheries has necessarily changed; if anything, they have simply broadened.

Hatcheries are limited in what they can accomplish. Indeed, as the study elaborates, "[h]atcheries promised to make up for the loss of fish abundance that resulted from construction and operation of the Columbia River hydroelectric system and other development activities. Clearly, this result has not been achieved." It is our understanding this is a contractual statement, and an admission of breach of contract.

So what is Northwest Power and Conservation Council planning to do about the fact that the Federal Columbia River Power System (FCRPS) cannot simultaneously produce power and fish, as has been promised for so long? The fishermen of the region have been giving the FCRPS a chance to live up to the obligations it shouldered with the development of the Columbia Basin for industrial purposes. While the APRE implies Northwest Power and Conservation Council no longer needs to fulfill its obligations, we fully expect that these obligations be fulfilled.

## **ENDANGERED SPECIES**

ATA is keenly aware of the necessity of recovery of endangered species in the Columbia Basin. Our fisheries seasons are designed to satisfy NOAA Fisheries mandates for protection of listed salmon runs, most particularly Snake River Fall Chinook.

While it is necessary to conduct this review of hatchery operations in the context of ESA compliance, Northwest Power and Conservation Council should remember that hatchery reform will not be sufficient to achieve endangered species recovery. As recently ruled by Judge James Redden, NOAA Fisheries is required to produce a BIOP "with certainty" that measures to recover endangered salmon will be undertaken. Furthermore, 118 members of congress expressed their concern to President Bush that the new BIOP be "guided by the best available economics and science", and "that all scientifically credible options, including...partial removal of the four dams on the lower Snake River...be considered". ATA is open to all options that fulfill the salmon production obligations of FCRPS/NOAA/NPCC, and is adamant that production and recovery to harvestable populations be accomplished.

ATA recognizes that some degree of hatchery reform may be necessary to conform to current scientific practices. It is imperative that hatchery operations be compatible with endangered species recovery efforts, and that they produce genetically sound and sustainable stocks.

## **SOCIO-ECONOMICS**

ATA questions the entirety of Section II.C *Economic Context of Hatcheries*.

Hatcheries were part of an overall plan to increase the productivity of the Columbia Basin with hydropower development. It was clear that with irrigation and electricity, agriculture would be possible in the Basin. It was also clear that fisheries were the dominant economic sector for the Columbia Basin, and that hydro development would destroy the salmon runs (based on the experience of Grand Coulee Dam). Hatcheries were the only hope of having the cake and eating it too.

Fairness requires looking at the benefits derived from the investments in hatcheries and hydropower development. The social debate of the role and value of hydropower development is on-going, and statements in the APRE on relative changes in the social value of salmon harvest are at best unfounded conjecture. A quick look at the "benefits" of irrigation and power generation is warranted.

Irrigated crops such as apples, wheat and potatoes have lost much of their value since the green revolution in the developing world. Hundreds of acres of apples have been taken out of production in the last decade. Commodity prices for wheat are equivalent to depression era per bushel prices. Potato crops are worth less than the value of the water it takes to grow them. The American farm runs on subsidies of 40% of total income.

While hydroelectric generation has proven to be valuable to the region, projects such as the four lower Snake River dams are of dubious value. The lower Snake River dams provide an optimistic estimated 5% of the total output of the FCRPS. Unlike projects with impoundments, these dams provide most of their electricity in the spring, when it is least needed. Meanwhile, the lower Snake River dams are at the center of an endangered species maelstrom costing millions of dollars per year for the barging of young salmon and millions of dollars in lost fishing income, because of endangered species constraints on all Pacific Coast and in-river fisheries.

Those industry sectors dependent on hydropower development are not performing as they were 20 or more years ago. Given that Northwest Power and Conservation Council's charge from Congress is to manage the FCRPS as a whole system for conservation of fish, as well as production of energy, ATA finds that for Northwest Power and Conservation Council to simply conclude that hatchery

production can now be reduced is simply unacceptable. Instead, an evaluation should be conducted to determine what would be best for the region in the context of all uses of the Columbia and Snake Rivers. Northwest Power and Conservation Council owes the region a review that takes a global look at the use of resources in the Columbia Basin and makes recommendations that are based on credible study results.

ATA questions the evaluation of the social value of ocean fisheries north of Cape Falcon. While it is true that farmed salmon production values is much larger than of wild Pacific salmon, there is no lack of interest in wild harvested salmon. Examples to the contrary include Copper River Chinook, Columbia River Spring Chinook, and winter troll chinook, which all post ex-vessel prices in the three to four dollar per pound range. Chinook harvested on the California coast in 2003 were worth up to \$3.50 per pound. Low prices in Washington, Oregon, and elsewhere reflect marketing failures, not diminished consumer interest in our product.

ATA strongly objects to Northwest Power and Conservation Council making purchasing decisions for consumers. For consumers who want wild salmon, farmed salmon is no substitute. Northwest Power and Conservation Council strongly implies that farmed salmon can replace wild salmon. This is an arrogant presumption, or personal point of view, which has no place in this review.

## **CONCLUSION**

ATA strongly objects to Northwest Power and Conservation Council's evaluation of the changing social role of hatcheries based on farmed salmon. This is like DeBeers changing its diamond production priorities based on the cubic zirconium manufacturers.

Northwest Power and Conservation Council must acknowledge that hydropower development was agreed to by the region's citizenry based on the premise that salmon harvests would not be dramatically harmed. That the salmon industry has been harmed because of hydropower development is not a good reason to change hatchery production. Rather it is a reason to reexamine the operation of the hydropower system, and to make certain that operation of those facilities allows production and maintenance of harvestable salmon populations for fishermen coast wide.

Thank you for considering ATA's point of view on this important matter.

Best regards,

Dale Kelley  
Executive Director