



December 8, 2003

Mark Walker
Director of Public Affairs
Northwest Power and Conservation Council
851 S.W. 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

Dear Mr. Walker:

The members of the Columbia Basin Fish and Wildlife Authority (CBFWA) welcome the opportunity to comment on the “Artificial Production Review and Evaluation Draft Basin-Level Report” (APRE) Document 2003-17, dated October 7, 2003, recently released by the Northwest Power and Conservation Council (NPCC). Our comments address our general concerns and provide several examples to illustrate those concerns.

The APRE draft report concludes that “reform” of the hatchery system may be needed because: 1) the social purposes of the hatcheries may have shifted; 2) their operations may be creating biological problems in some cases; and, 3) additional monitoring is needed. These conclusions are neither new nor, in this case, founded on a solid basis. Therefore, we believe that the report adds little to the practical evaluation of hatchery programs or management decisions relative to future programs for these hatcheries.

The APRE fails to incorporate system wide issues which affect specific hatchery programs. This is, in part, a result of the use of questionnaires, which required “yes/no” answers to complex issues. The fishery managers have incorporated overall fishery and basin wide considerations into the management of hatchery programs. The section titled “Regulatory Context for Artificial Production” should have addressed these state/tribal laws, plans, policies and authorities.

The questionnaire approach is premised on a “one size fits all” for hatchery requirements and programs. By taking this approach the APRE did not provide any insight into the actual present and future role of hatcheries in the basin. The questionnaire approach did not allow each hatchery program to be considered in light of its particular objectives and problems. In order to do this, hatchery specific smolt to adult returns need to be evaluated including contribution to fisheries and reduction in hatchery production due to specifics such as hydrosystem operations. Responses to questionnaires do not capture the specific information required to determine the effectiveness of hatcheries.

Section II.C, “Economic Context of Hatcheries”, focuses on ocean and mainstem fisheries and does not adequately address the economic value of tributary fisheries. The statement on page 19 - *The trends in commercial fishing suggest that harvest of Pacific salmon from the Columbia*

River or ocean areas will make declining future contributions to the value of seafood supply and to local incomes – may be correct but also generates misconceptions. Future harvest in tributary areas could increase contributions to local incomes, and much of the harvest could be supported by hatcheries. Economic information on tributary fisheries is available but was not considered in the report, thus the economic context of hatcheries is not fully considered.

The APRE database appears to summarize the HGMP information submitted to NOAA Fisheries. Unfortunately, the APRE database has apparently left out important notes from the HGMP and does not direct users to the more complete and accurate source. The APRE seems to be attempting to duplicate the NOAA HGMP effort. Stronger emphasis should be included to make sure readers do not confuse APRE-generated HGMPs with the “official” HGMPs being produced through NOAA processes.

The APRE fails to use all of the available information on existing hatcheries. The Comparative Survival Study (CSS), for example, is compiling time series data on several hatchery spring and summer chinook populations which include survivals and smolt to adult return data. Projects like the CSS provide information on hatcheries that includes impacts of actions outside of the hatchery environment, which greatly affect the returns to the hatchery. Water supplies and hatchery facilities are only a portion of the suite of variables that impact hatchery returns and contributions to fisheries. In this way the APRE did not present a complete review of hatchery information or data.

Another example involves the use by APRE of planned hatchery release numbers rather than the more accurate actual releases. For example, the actual hatchery release numbers for 2003 are only 68.8% of the planned release numbers (Fish Passage Center Hatchery Release database). Use of the larger planned release numbers will deflate survival, smolt-to-adult, and escapement estimates thus reducing the apparent effectiveness of the hatcheries.

The APRE did not use the extensive PIT tag data sets that would have been useful in a quantitative analysis of hatchery effectiveness, even though the data, analysis and reports were provided.

Because of these data collection shortcomings, errors have crept into the report reducing its credibility. For example, the authors assert that escapement was measured for only about 21 percent of the programs. This is in error, whether due to inadequate data collection or misinterpretation of the results.

The APRE results do not provide a sound basis for policy deliberations. The report did not use all relevant information, makes misleading interpretations, and has errors. The fishery managers may submit comments individually correcting errors associated with the facilities for which they are responsible.

Originally, there was to be an opportunity to review the APRE data before the draft report was released. Unfortunately that did not occur. Now the focus of the public review will be on the

accuracy of the data rather than on the policy discussion. We may end up focused on the dots rather than the picture they create.

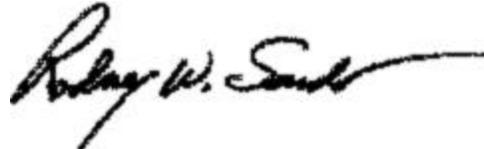
The real question, that the APRE is not addressing, is how to change the objectives of specific hatcheries, if warranted, to meet some larger regional goals. Those entities with responsibility for the operation and funding of artificial production in the basin must be engaged in those discussions.

The purposes of many of the anadromous fish hatcheries and the mechanisms for their funding were set by Congress (e.g., Lower Snake River Compensation Plan) to mitigate for the federal hydropower system. The operational aspects of many anadromous fish facilities are under the jurisdiction of the federal courts (e.g., U.S. v. Oregon). The purposes of many of the facilities producing resident fish are set by the states and tribes and funded by license fees in many cases. There are already several processes underway that will affect the operations of the hatchery system, including revising NOAA's hatchery policy, ESA consultations on Hatchery Genetic Management Plans, U.S. v. Oregon, Technical Recovery Teams, and subbasin planning. To change hatchery operations, the NPCC must work within the existing hatchery authorities, consistent with the current processes and with the fish managers. The NPCC is at a disadvantage in this area because it is neither a fishery management agency/tribe nor does it control hatchery funding.

The NPCC could take a leadership role in engaging the fish managers and the fishing interests in discussions about the appropriate goals for the hatchery system. These discussions must also include the details of implementation: how new hatchery goals will integrate with the NPCC subbasin plans; what physical and operational changes are necessary; and how any changes will be funded.

We hope that the NPCC can engage the fishery managers, fishing interests, and the public in a collaborative discussion of the role of artificial production in fishery management in the basin.

Sincerely,



Rod Sando
Executive Director

cc: NPCC Members
CBFWA Members
Therese Lamb, BPA