

Colville Confederated Tribes

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December 9, 2003

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

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Dear Mr. Walker,

The Colville Confederated Tribes (CCT) appreciates the opportunity to comment on the Artificial Production Review and Evaluation Draft Basin-Level Report (APRE) Document 2003-17, dated October 7, 2003. We hope our comments will be considered and incorporated in the final report.

The CCT have been involved with the Northwest Power and Conservation Councils program for many years and has long contended that inequities have persisted with respect to the funding allocations within the Columbia Basin. The APRE report is yet another report which supports our position. The question is; what will be done about it? We hope that this is not just another report that collects dust on the shelf and that true hatchery reforms will take place that will benefit the resource and the tribal people of the Columbia Basin.

The report states "The tribal ceremonial and subsistence fisheries are of highest priority and generally occur before tribal commercial fishing." And goes on to state "However, mainstem hydroelectric projects, agriculture, and other development have severely eroded the natural capability to support these rights and the tribal fisheries. The tribes have pursued hatchery programs to support their treaty rights and subsistence, ceremonial, and commercial harvests. Several tribally managed hatchery programs have been developed above Bonneville Dam under the Council's Fish and Wildlife Program as hydropower mitigation. The tribes have become leaders in the development of hatchery programs that attempt to be compatible with current scientific information on genetics and ecological processes." These statements indicate that to improve the performance of the hatchery program throughout the Columbia River Basin Tribal agencies should play a major role. The Colville Tribes have worked hard over the last several years to provide the Council and other funding agencies with a blue print on how to correct many of the problems outlined within the APRE document especially regarding the Columbia Cascade Province.

The Columbia Cascade Province is identified within the APRE report as having: a) the highest proportion of hatchery populations due to most hatchery programs being small and integrated; b) the smallest number of natural populations due to development of the hydro system, habitat degradation, and down river harvest; c) the second-lowest number of fish released; d) the lowest proportion of

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research programs; and e) the least amount of Federal and BPA funding. These findings alone demonstrate the inequity issue, but can be strengthened by integrating these findings with other facts about the Columbia Cascade Province such as: a) contains much of the Upper Columbia ESU that is rated as the #1 priority for steelhead recovery by NOAA Fisheries BIOP; b) contains much of the Upper Columbia ESU that is rated as the #3 priority for Spring Chinook Salmon recovery by NOAA Fisheries BIOP; c) is the closest province geographical to the sight of the largest hydroelectric development and anadromous fish losses (Chief Joseph, and Grand Coulee Dams); and d) adult returns are available to the largest number of users within the Columbia River

The APRE Report states "A sizeable majority of Columbia River Basin hatchery production takes place in the lower three provinces. Unfortunately, the communities most affected by the construction of the dams do not share equally in this production. Communities farther inland normally have less access to returning adults because of their geographic location. Columbia River Basin hatchery programs have exacerbated this situation by producing a disproportionate number of fish in the lower Columbia River. Attention should be given to the questions of whether and how to balance hatchery production. With the rise of the salmon farming industry and the decline in ex-vessel prices for commercially harvested salmon (Section II.D), hatchery programs could produce fewer fish for commercial harvest. Many hatchery programs produce fish that are currently under utilized because it is not economically viable to catch them. This creates surpluses of adult fish at hatcheries and increases the risk of hatchery fish straying into unintended areas. Hatchery fall Chinook production is large relative to other hatchery programs in the Columbia River Basin. This production adds to the already large peak of Chinook returning in the fall of each year. Hatcheries could be used to enhance biodiversity by producing a wider variety of salmonid species and life histories. Greater species and life history diversity makes sense ecologically and could provide greater harvest opportunities by enhancing adult returns over a longer time period."

The CCT have proposed to construct a hatchery at the based of Chief Joseph Dam the current terminus for anadromous fish in the Columbia River. This hatchery would provide increased ceremonial and subsistence fishing opportunities for Native American Tribes and redistribute fall Chinook production to a more beneficial location where production could be utilized. The proposed hatchery would also provide an integrated spring and fall Chinook program that would assist with recovery and reintroduction efforts into new habitats. In addition, The Colville Tribes are current taking part in a pilot project to enhance steelhead recovery efforts using local adapted stocks. These projects could be ready to implement in a short timeframe if the money and resources were made available and would address many of the issues raised within the APRE report.

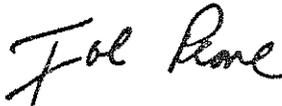
Another recommendation given in the APRE report states "All artificial production programs should strive to operate in a manner that promotes local adaptation. This means that broodstock native to, or likely to adapt to the watershed where they will be released should be utilized so that the program perpetuates only adults returning to the same watershed. No importation of broodstock from outside a stream basin should be allowed. The APRE indicated that 38 percent of anadromous hatchery programs imported broodstock from out of subbasin. Out-of-basin rearing should also be avoided; 42 percent of the anadromous programs relied to some extent on rearing facilities outside the stream basin where the fish were released."

All Colville Tribal hatchery efforts and HGMPs are strongly aligned with this philosophy but finding support through the councils program has been difficult in the past, hopefully with this information, the future will be different.

The CCT strongly agree with the conclusion of the APRE report that states, "Hatcheries present a myriad of problems (Section II.F), yet critics of hatcheries rarely provide viable alternatives. Hatcheries appear to be the only alternative in order to mitigate for habitat lost to development and to honor treaty obligations while retaining the benefits of hydroelectricity, agricultural irrigation, transportation, and flood control. Therefore, hatcheries appear to be part of the solution to maintaining viable fish runs in the Columbia River system. For example, hatcheries still offer the only way to mitigate for fish habitat lost to construction of a dam without fish passage facilities. In addition, hatcheries may offer the only means of providing sufficiently productive stocks to allow the continuation of tribal fisheries above Bonneville Dam."

The CCT have developed a number of hatchery programs that could successfully address the problems with the current hatchery program within the Columbia River by applying recommendations from this report. We have already proposed to make many of the needed changes and relocate hatchery production where it is most appropriate and beneficial. The CCT are providing funds to start many of these programs and we are attempting to gain support from fishery co-managers and other funding sources (mid-Columbia PUDs), but until federal or BPA funding can be provided these efforts will remain in the planning, or pilot project stage and hatchery reform will remain as only a good idea. The CCT strongly urge the Northwest Power and Conservation Council and Congress to apply the recommendations of this report especially within the Columbia Cascade Province and reform the currently outdated and inequitable hatchery programs of the past in the Columbia River basin.

Sincerely,



Joe Peone, Director
Fish and Wildlife Department
Colville Confederated Tribes

Cc: NPPC Members
Therese Lamb, BPA