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From: joel kawahara

Sent: Friday, November 28, 2003 10:45 AM

To: comments@nwcouncil.org

Subject: Comment on APRE report document 2003-17

to: Northwest Power and Conservation Council
re: APRE

I endorse the comments of the Washington Trollers Association. I feel that the APRE draft report was written in the same spirit as most other reports and plans e.g.: dam the river, screw the salmon (and fishermen), lie and hide behind the "best interests" of the region.

The context of the report is narrowed to hatcheries and artificial production, and never examines the Columbia Basin as a pacific salmon ecosystem. In this limited context, hatcheries are graded on what they are doing in relation to wild, and for the most part listed salmon runs in the basin. What is needed is a complete, honest, basin wide review by NWPCC in conjunction with the ongoing remand of the 2000 BIOP of all aspects of the freshwater portion of the salmon ecosystem.

External to the APRE, NWPCC and other agencies are making much ado about recent large salmon runs, due to improved ocean conditions. Indeed, from a harvester's perspective, there is much to celebrate as seasons have run longer than at any time in the last two decades. However, Washington coastal trollers are not able to prosecute an early season, as Oregon is, because of continued restrictions on harvest impacts on Columbia river spring chinook. And it is worth noting that sockeye are not sharing the good fortune of chinook, possibly because of the sockeye's greater dependence on high quality freshwater habitat. Bottom line is that as a Washington state troller, I will not be satisfied that salmon are recovering in the Columbia basin until all ESA listed salmon are recovered to harvestable populations.

In my reading of the APRE, I found that the historical context was distorted and not factual. I cannot let this section remain unchallenged. Page 12, third paragraph beginning " The second phase of hatchery development..." and continuing " The problem of getting adult salmon over high mainstem dams had not been completely solved , leading to concern over the fate of upriver salmon stocks. Artificial propagation was proposed as a solution to impassable dams and as mitigation for lost habitat above the dams."

It is historically important to ask by whom the artificial production was proposed. According to the 1949 Washington Department of Fisheries Annual report, "Loss of the Snake river fish production would be so serious that the department has consistently opposed the four-phase lower dam program that would begin with Ice Harbor dam near Pasco. "The reasons for opposing Ice Harbor were carried before the U.S. Senate appropriations committee early in 1950 by John M. Hurley, chief of stream improvement for the (Washington) state Department of Fisheries. After discussing the effect that further upriver dam construction would have on the salmon runs, including abnormal delay of the migrant adults, he made a statement, part of which follows, on downstream

migration problems and inadequacy of hatcheries as a substitute for natural environment. "

The senate testimony of Mr. Hurley continues on the subject of fish hatcheries and natural spawning: "I spent several years as assistant supervisor of the hatcheries in the State of Washington over what we believe to be the most extensive and effective salmon rearing system involved in the production of salmon anywhere in the world. "We found that our hatcheries were inadequate as a replacement for a major fish producing stream, and that we must consider and utilize these hatcheries as a supplement to a natural stream to make sure that weather conditions, floods and predators have not destroyed all of the available downstream migrating stock.

"Another factor is this: the productive capacity of hatcheries would be infinitesimal compared to the stream production of such a river as the Snake..."

It is abundantly clear that the agency that considers itself the operator of "the most extensive" hatchery system in the world in 1949 also considered hatcheries as "inadequate replacements" for major fish producing streams. Clearly WDF did NOT propose hatcheries as substitutes for natural production.

The point is this: persons not related to the protection and management of Columbia and Snake rivers salmon proposed hatcheries. The idea that hatcheries could replace natural production in the Snake and elsewhere was not universally accepted, in fact loudly denounced by WDF. In 1949, hatcheries were not a biologically sound idea, and were only proposed as political ploys to give the appearance that fish and fishermen were being cared for as the river was developed.

The result is that fisheries of today's Columbia Basin are the product of politically motivated decisions over the last 60 years. Hatcheries are a minor contributor to the current situation compared to the effects of development and resultant habitat degradation in the basin. Restoration of the mainstem of the Snake river is currently in court, and options including removal of the four lower Snake river dams are yet to be mandated. In spite of known inadequacies, hatcheries remain the primary mitigation strategy, and are likely to continue until new recovery plans are enacted.

In conclusion, while hatchery reform is welcome, NWPCC should be concentrating it's efforts on the restoration of the entire ecosystem. Activities such as barging of downstream migrants can not be substitutes for intact, free flowing rivers. Even though hatchery production is essential to all Washington coast fisheries, restoration of all salmon runs must remain the ultimate goal of NWPCC.

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