From: Sue Ireland
Subject: Kootenai HGMP and APRE

Hello Bruce:

Re: APRE - Kootenai Tribal Sturgeon Hatchery, Bonners Ferry, ID 83805

First, I would like to commend you on the monumental effort of compiling the info necessary for the APRE analysis. I am impressed with the scope of the project. I have a few comments I would like to share with you in relation to the HGMP and Benefit/Risk Assessment for the Kootenai Sturgeon Hatchery.

I have attached the HGMP that we submitted in 2000 before the Provincial Reviews took place. It includes much more complete information than the electronic draft HGMP on the web (although it was written in 2000 and should probably be updated). I have looked through the summary of benefits and risks for our program in the draft APRE report. My only comment, and this is substantial and I'm sure that you have heard it before, is that the APRE is geared toward anadromous stocks.

For example, the following risks were identified for the hatchery in the following category:
Incubation as it affects Survival for Kootenai ID Sturgeon-Hatchery
Risks:
47. Not mixing families at random at ponding poses a risk of loss of genetic variability during rearing.
The USFWS Recovery Plan and the Breeding Plan devised specifically for Kootenai sturgeon conservation aquaculture mandates that all families be kept separate during rearing so that the parental contribution can be identified at the time of marking and release (Age 1)
13k. Use of water for incubation outside the recommended range in IHOT standards for temperature may adversely affect survival and proper development of eggs and alevin.
and 13l. Use of water for incubation outside the recommended range in IHOT standards may adversely affect survival and development of eggs and alevin.
We did not check the box that indicated we followed IHOT standards (although our water temperature and quality is within normal guidelines for aquaculture production) because there are no IHOT standards that I am aware of for sturgeon.
In another example, some of the risks identified for "Rearing as it affects survival" category are:
68 d. Rearing under normal hatchery hydraulic characteristics may not provide enough exercise to sustain predator avoidance behavior.
68 f. Lack of predator avoidance training may decrease smolt to adult survival.
68 g. Lack of overhead and in-pond structure does not produce fish with the same cryptic coloration or behavior as do using enhanced environments
None of these risks are appropriate to apply to the sturgeon program. Research has shown that sturgeon > 4" TL are not susceptible to predation. Fish are released from the facility at Age 1 and are > 4" TL and our survival estimates after one year of release are 60% (+ or - 10%) and 90% in subsequent years.
14. k. Inhibiting upstream and downstream passage of juveniles and adults poses a risk to distribution and productivity of naturally produced stocks.
This does not apply to sturgeon facilities
In summary, it might be possible to provide some qualifying statements in the APRE to point out the the analysis was not adapted for specific species

and that some of the risks may not be appropriately applied to all programs. Thank you for the opportunity to comment on the APRE.

Sincerely,

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