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NATIVE FISH SOCIETY

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November 18, 2003

Mark Walker,
NW Power Planning Council
Suite 1100
851 SW Sixth Ave
Portland, OR 97204

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RE: Comments on the Artificial Production Review and Evaluation Report

Dear Mr. Walker:

Thank you for the opportunity to provide comments on the Artificial Production Review and Evaluation Report (APR). The Native Fish Society would like our comments entered into your record.

For the first time in the 125-year history of hatchery operation in the Columbia River Basin, a full review and evaluation has been completed in the APR. It should be troubling to decision makers that there are many hatchery programs that do not monitor survival of fish released or contribution to fisheries making it impossible to determine whether the hatchery investment is providing benefits. Also the APR notes that 63% of the segregated and 80% of the integrated hatchery programs represent a risk to wild populations (page 49) This is truly a long overdue yet important accomplishment. But that conclusion leads to a key question: Now what? These comments are aimed at providing a response to that question.

There are two possible options available to the Council and the member states. One would be to bring the task to a close and put it on the shelf. That is not an unusual response and over the last 125 years of hatchery history this option has been selected more than once. The second option is to use the APR to develop recommendations for hatchery reform and to provide an annual audit of the hatchery program to make it accountable to the public funding it consumes. It is this second option that I hope the Council will select. In order to proceed, however, the Council must fund a small staff to maintain the data base that has been built to write the APR, implement the recommendations for hatchery reform and provide the accountability needed to justify the annual expenditures in hatchery operations.

The next step should be to have the staff that did the work on the APR complete an issue paper on hatchery reform recommendations for public review and comment. This would be used by the Council to adopt a policy on hatchery reform. Following this, the

Council should fund a hatchery reform office within the Council to work on actual reform at each hatchery. I would like to emphasize that if no one is put in charge, there will be no hatchery reform and that means the hatchery system is at risk.

The lack of oversight on the huge hatchery program in the Columbia River has made it vulnerable to its critics and its funding could be at risk. The hatchery system has not been held accountable for costs to produce adults or for impacts on naturally spawning wild populations in the basin. The Council asked for and received independent scientific evaluation of the Columbia River hatchery program. These reports, among others, have provided recommendations for hatchery reform. The APR is yet another evaluation of the Columbia River hatchery program calling for reform and making its case very well. It is now time for this information to be used by decision-makers to reform the hatchery program, making it biologically sound and financially accountable. The studies are in and they provide a coherent message, so now it is time for action.

Sincerely,

A handwritten signature in black ink, reading "Bill M. Bakke", followed by a horizontal line extending to the right.

Bill M. Bakke, Director