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Oregon

Theodore R. Kulongoski, Governor

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November 13, 2003

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

Dear Mr. Walker,

The Oregon Department of Fish and Wildlife appreciates the opportunity to comment on the APRE Basin-Level Draft Report (Northwest Power and Conservation Council Document 2003-17). Enclosed is a summary of comments from Fish Propagation Program staff.

Sincerely,

George Nandor
Assistant Fish Propagation Program Manager

cc: John Thorpe
Guy Chilton

Attachment

NOV 18 2003



ODFW Comments Regarding the APRE Basin-Level Draft Report
(Northwest Power and Conservation Council Document 2003-17)

November 12, 2003

Technical Comments

Table II-1

Under the "Responsible Entity" column for Willamette River Basin Dams Mitigation should be **U.S. Army Corps of Engineers** and not Oregon Department of Fish and Wildlife. ~~These are mitigation hatcheries constructed and funded by the USACE for habitat lost due to dam construction and operation.~~

Under the "Responsible Entity" column for Bull Run and North Fork Projects Mitigation please add **City of Portland** (both PGE and the city provide mitigation money). The city pays for 18.8% of the O&M of the Clackamas Hatchery as mitigation for the Bull Run dams' role in supplying drinking water for the city. PGE pays for 22% of the Clackamas Hatchery budget for the power production portion of the Bull Run dams and for the North Fork Project.

Discussion

ODFW agrees in general with the hatchery reform principles stated in the report, that hatchery programs need clear goals, should be scientifically defensible and should be managed with responsive and well-informed decision-making.

Regarding the setting of goals, we would like to make the following points:

- Setting goals consistent with current biological, economic and cultural values and legal requirements is not a simple task, as these values are rarely in agreement. For example, the report cites diminishing economic returns for ocean-caught salmon due to artificial culture of Atlantic salmon as a reason to reduce hatchery production. This does not address the biological concerns regarding introduction of a non-native species or the fact that "current adult returns fall far below historic estimates", and does not address the accompanying reduction in sport fishing opportunities that make a larger economic contribution than commercial fishing.
- Ecological and social goals are not necessarily compatible. Hatchery production of a wider variety of species may provide greater harvest opportunities, but will increase the effects of hatchery fish on wild populations of those species, and could affect conservation strategies already in place.
- Without improvements to fish passage and environmental conditions in the Columbia River, returns of adult populations to upriver areas will remain limited.
- The accurate measurement of the cumulative effects of hatchery programs on native stocks is necessary, so that realistic goals can be set.
- The size of returning runs is affected by many factors beyond the hatchery operator's control; these factors are not easily measured, let alone predicted. The ability to adjust hatchery production levels to meet these conditions is a difficult

task. This applies as well to meeting annual limits on the percentages of hatchery stock spawning with wild stock.

- Decisions to change segregated hatchery programs to integrated programs need to be made on a case-by-case basis.

Regarding scientific defensibility:

- Out-of-basin rearing provides more flexibility in the use of facilities to meet program goals.
- The ability to meet criteria for integrated programs is limited by inability to predict escapement numbers.
- Volitional release may not be successful with all species and stocks, and could interfere with segregation of hatchery releases from native fish out-migrations.

Regarding informed decision-making:

- ODFW agrees with the need to monitor hatchery programs and improve analysis and distribution of existing data.
- The success of a program needs to be measured over a suitable time period. There are many factors involved in the success or failure of a program that are beyond the managers' control, so short-term measurement of success will not provide realistic results.

General Comments

In general ODFW agrees with the broad conclusions of this report. We agree that hatcheries are limited in what they can accomplish. They are not a replacement for lost habitats and hatchery reared fish are actually also vulnerable to degraded habitats and over-harvest. ODFW also agrees that the purposes of hatchery programs are changing and have been changing in the past decade. Much more emphasis is being placed on using local broodstocks and integrating hatchery programs with native local fish populations to meet changing ecological, social, economic and societal needs. ODFW agrees that many hatcheries need reform to meet new goals and purposes, and to upgrade old, out-dated facilities with new state-of-the-art fish culture technology. However, these reforms will require an infusion of money from the various funding agencies. ODFW also agrees that hatcheries will continue to be significant factors in fish management in the Pacific Northwest providing fish for harvest and as a factor in the recovery of declining fish stocks. It is also imperative to continue and even increase monitoring and evaluation efforts to measure hatcheries' contributions to societal needs and to enable the management agencies to make sound fish management decisions.

It should be noted that releases from ODFW operated hatcheries are just a small proportion of the total anadromous salmonid releases in the Columbia River Basin. ODFW operated hatcheries release about 35.7 million smolts annually into the basin. This represents only 17.2% of the total. Of these, 4.2 million are trucked and released in the State of Washington. So of the total, only 31.5 million smolts (15.2%) are released in Oregon.

The report is critical of the fact that a large proportion of the salmon releases are fall chinook, which "are relatively inexpensive and easy to rear in hatcheries in large numbers". It should be noted however, that ODFW has reduced lower river fall chinook releases by 14.1 million since 1992. Current fall chinook releases from ODFW hatcheries are 16.7 million (of which 3.5 million are trucked and released upstream in Washington), so this is a 45.8% reduction in lower river fall chinook releases from ODFW hatcheries.

A large part of the ODFW fish production is in the lower river area because of the 6 large hatcheries in the Willamette River Basin. These facilities were constructed to mitigate for fish losses due to the construction of many large hydropower and flood control dams on the Willamette River tributaries. These hatcheries were constructed where the mitigation needed to occur. It would not make sense to move these hatchery programs upriver.

The report focuses on problems and makes little mention successes. Some examples of successes in Oregon: The Willamette River spring chinook hatchery program is a huge success providing for a large sport and commercial fishery with high quality fish. Many years of fish runs of 50,000 to 100,000 adult spring chinook that swim through downtown Portland is nothing but a success! The Willamette spring chinook were all derived from local broodstocks and the hatchery programs were instituted to mitigate for lost habitat due to the construction of flood control and hydropower projects in major Willamette River tributaries. Also, the Round Butte hatchery program on the Deschutes River for both spring chinook and steelhead is regularly meeting the mitigation goals of 1,200 spring chinook and 1,800 summer steelhead back to the project area. The Confederated Tribes of the Umatilla would also argue that the hatchery rearing programs on the Umatilla River have been a success in producing adults returning back to the river for harvest. This, after many of the fish were extirpated because of water withdrawals from the river for irrigation projects. There are also other examples of successful hatchery programs in other areas of the basin.

One of the conclusions of the report states that "despite massive hatchery programs, current returns to the Columbia River fall far below historical estimates." Without removing the changes made to the Columbia River system – overfishing, loss of habitat, environmental changes, impediments to migration, increased predation and pollution – returns will never reach historical levels. Within these limitations, the mitigation hatcheries are doing what they were designed to do, as demonstrated by the large percent of hatchery fish in recent adult returns.

Another of the conclusions of the report states it is important "that hatcheries operate in a business-like manner", yet the report is critical of hatcheries rearing fall chinook that "are relatively inexpensive and easy to rear in hatcheries in large numbers." This illustrates the dichotomy of publicly funded and operated fish hatcheries in the Pacific Northwest. We must accept that hatcheries are not businesses, or else they would be operated for profit. The product would be produced as cheaply as possible and sold for a maximum profit. This is clearly not the intent of public hatcheries. Most public hatcheries are

harvest hatchery programs operated as a subsidy for the sport and commercial fishing industries, while at the same time, trying to be good neighbors to wild native fish populations. Conservation hatchery programs also exist, to maintain or increase the number of naturally produced native fish without reducing the productivity of naturally produced fish populations. Some examples of these conservation programs are captive brood programs, supplementation programs and restoration programs.

Oregon is a leader in the effort to “align hatchery policies and practices with current social priorities and scientific knowledge”. The Native Fish Conservation Policy, Fish Hatchery Management Policy and Fish Health Management Policy all recently approved by the Oregon Fish and Wildlife Commission are designed to meet the social needs and priorities of Oregon citizens in the 21st century by providing fish for harvest and conserving native fish populations.

The report focuses on the need for adequate monitoring and evaluation of all hatchery rearing and release programs. The main difficulty in accomplishing this is a lack of funding by the various funding agencies. Ongoing monitoring and evaluation programs are expensive and need to be funded for long-term periods to produce useful results. Even so, all chinook and coho smolt release groups from ODFW operated facilities have a coded wire tag sub-group that represents the entire group. Retrieval of the tags and data collection has been a long-term monitoring and evaluation effort in Oregon. Increased funding would allow more groups of fish to be marked and tagged, more tagging of steelhead, and more in depth analysis of the data to guide future fish management decisions.