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The SHOSHONE-BANNOCK TRIBES

Fish And Wildlife Department
P.O. Box 306
Fort Hall, Idaho 83203
Phone/Fax (208)478-3986

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Mark Walker
Director of Public Affairs
Northwest Power and Conservation Council
851 S.W. 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

December 9, 2003

Dear Mr. Walker:

The Shoshone-Bannock Tribes (SBT) welcome the opportunity to comment on the "Artificial Production Review and Evaluation Draft Basin-Level Report" Document 2003-17 (October 7, 2003), recently released by the Northwest Power and Conservation Council (NPCC). The following technical comments are in addition to the comments of the Columbia Basin Fish and Wildlife Authority that the Shoshone-Bannock Tribes endorse.

The APRE can not change hatchery operations. Reforming hatcheries is not mandated by the congressional language authorizing the APRE. Congress says only for the APRE to recommend a process to bring about reform. The APRE can not change the goals and objectives of the hatchery programs because the NPCC is not mandated to do so. Only the fish and wildlife managers are authorized with the responsibility to change the goals and objectives of hatchery operations – the fundamental parameters that control the hatchery operations. This is being done in US v Oregon, subbasin planning, and Endangered Species Act (ESA) consultations on Hatchery Genetics Management Plans (HGMP).

The APRE charge is to compile information needed to evaluate reform, and recommend an implementation process. The APRE completed this task several years ago, with its report to Congress. The Integrated Hatchery Operations Team (IHOT) – a group that the fish and wildlife managers had ownership of and commitment to - got cut from the NPCC program shortly before the APRE started. This cut was one of the most contentious in the Fish and Wildlife Program's history. The IHOT was efficient, functional and necessary, and would have been the group with some standing to help implement hatchery reform.

The APRE has replaced the IHOT, but does not have the full support of the fish and wildlife managers. Without this support, any changes to the goals and objectives of hatchery programs will not happen. Without changes to the goals and objectives, there is no hatchery reform. The Columbia Basin Fish and Wildlife Program is not owned by the NPCC. The NPCC over-extended its authority and stole part of the Program from the fish and wildlife managers when it replaced IHOT with the APRE.

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ADREC/Comment on APRE Draft Report 2003-17/18-2003

The APRE should not go beyond its congressional directive. It should simply report the compiled information, and recommend a process to implement hatchery reform – and then politely go away. The NPCC needs to give us back IHOT.

The APRE database is inadequate. It is not the best available information. The Hatchery Genetics Management Plans and US v Oregon production information is where the best available information exists, and where reform is occurring. The APRE-generated HGMP database is not reliable and is not being used to change hatchery operations.

The SBT also support the comments of the CBFWA. The APRE is spinning its wheels – stuck in the mud, chasing its tail - re-establishing the conclusion that reform is necessary. The SBT proposed a process for emergency hatchery reform through the emergency measure of the 1994 Program. The SBT proposal for "Immediate Hatchery Reform" did not get funded, even though it ranked highly. The APRE does not have the authority to reform hatcheries. The database is not as complete or accurate as the HGMP database. The APRE fails to use actual release numbers, PIT tag data, and out-of-basin effects in its analyses. It fails to allow each hatchery program to be considered in light of its particular objectives and does not evaluate smolt-to-adult returns in light of fisheries and other man-caused mortality (e.g., the hydrosystem).

Another blatant error is the total omission of the SBT production (one million steelhead eggs in side stream incubators in the upper Salmon River tributaries; 480,000 steelhead smolts, mostly un-marked and all tributary releases (Lemhi River, Valley Creek, and Yankee Fork Salmon River); steelhead adult outplants; and 300,000 spring/summer chinook eggs in-stream incubated in the South Fork Salmon River. The SBT in-stream egg incubation of the captive reared spring/summer Chinook in the Lemhi, West Fork Yankee Fork and East Fork Salmon Rivers probably produce more fry than the rest of the program's adult outplants. To the best of our knowledge, these US v Oregon-authorized programs are not in the APRE database.

The report fails to include the SBT as parties to US v Oregon. This may seem minor, but with US v Oregon being the primary and major forum for anadromous hatchery reform, the exclusion of the SBT simply illustrates the NPCC continued attempt to diminish the fish and wildlife mangers' of authority.

The APRE advocates segregation of hatchery-origin and wild fish. In the Salmon River system, the tribal managers are trying to do just the opposite – and for good reason. The Shoshone-Bannock Tribes continue to use artificial salmon production to rebuild weak runs to full productivity. The APRE, accurately re-concludes that reform is necessary, but fails to offer real reform measures (such as the actions that the Shoshone-Bannock Tribes are implementing) that are essential to utilize the hatchery tool to its best capability.

The Shoshone-Bannock Tribes hope that the NPCC can engage the tribes in discussions of the role of artificial production in fish resource management in the basin.

Sincerely,

Keith Kutchins
Anadromous Fish Biologist

cc: FHBC
Claudeo Broncho, Fish and Wildlife Policy Representative
Chad Colter, Fish and Wildlife Coordinator