

Native Fish Society
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Conserving biological diversity of native fish and protecting their habitats

May 17, 2010

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RE: Comments on the Monitoring, Evaluation, Research and Reporting Plan

While the plan is impressive for its detail and comprehensive approach, I recommend a few improvements. The implementation agencies are the state, federal and tribal fish management agencies that have limited authority over habitat conditions in the basin. That authority resides with other agencies, but the fish management agencies can certainly measure the condition of the habitat and the fish and wildlife response to habitat conditions, but it is unlikely that they can be effective in changing habitat conditions that will benefit fish and wildlife populations on a broad scale.

The fish management agencies do have authority over harvest and hatchery programs and the impact they may have on fish populations in ESU/DPS designations. Yet the plan falls short in providing the necessary monitoring, evaluation, research and reporting needed to make sure that the managers are in compliance with the fish and wildlife program, its vision, and recovery of ESA-listed populations.

In the past the Council and its staff have been demure in trying to affect change in fish management to protect and recover native wild salmonids that are listed as protected species under the Endangered Species Act. The reason advanced for this is that the Council does not have the authority to secure improvements in harvest and hatchery programs. This is also true for habitat management agencies and their management programs. However, the Council does have authority to direct funding to programs that make improvements in harvest, hatchery and habitat programs administered under the authority of management agencies. Funding can be effectively used to make sure that the fish managers are in compliance with the fish and wildlife program, using the best available scientific information, and promoting actions that are consistent with recovery of ESA-listed salmonids.

The plan is designed to collect information on factors that may be limiting salmonid productivity, diversity, distribution and abundance in the Columbia Basin. Unless there is the ability by the Council to provide direction for change in these limiting factors that provide benefits to salmonids, the plan is merely a documentation of issues and problems.

Nine Management Questions:

Question 8: “Is harvest consistent with the Council’s Fish and Wildlife Program’s vision?”

I am not sure what the Council’s vision is but if it does not include specific measurable biological objectives by population and watershed based on productivity, abundance, diversity, and distribution, then harvest management will fail to support recovery of ESA-listed species. Unfortunately, the plan does not provide the needed direction.

On page 46 a further question is asked: “Is harvest consistent with the Council fish and wildlife program’s vision?” Again I am not sure what that vision is, but if harvest is not consistent with biological objectives for diversity, abundance, productivity and distribution by population and watershed, it will not provide adequate direction for the fish management agencies.

I recommend that harvest management be given direction to provide the spawner abundance, distribution, and diversity for each native, wild salmonid population by watershed in order to achieve recovery.

Question 9: “Does artificial production complement resident and anadromous fish recovery and harvest goals within the Columbia River Basin?”

This question is an improvement over question 8, for it includes “recovery.” The dual goals of harvest and recovery anticipate a conflict that the plan does not address adequately.

On page 46 this question is repeated and the plan would like to have hatchery production consistent with the fish and wildlife program recommendations and to “complement abundance of wild parr/smolts in stream. I am not sure what this direction means, but it does not address the best available scientific data that points out that wild salmonid fitness and reproductive success is compromised by naturally spawning hatchery fish. The direction provided continues to give permission for mixing of hatchery and wild fish in streams and in doing so sets aside the genetic, ecological, predation, and mixed harvest impacts this action will impose of ESA-listed species. As such the plan provides inadequate direction and may promote continuation of hatchery fish impacts on wild fish.

Biological Indicators: (page 44)

The “high level indicator” is based on abundance of salmonids in the Columbia River Basin. While abundance is one factor it is an inadequate biological indicator for it ignores spawner abundance, diversity, productivity, and distribution of salmonids in subbasins within the Columbia River basin. It also makes no distinction between hatchery and wild fish abundance. Consequently, a biological indicator that is confined to abundance can be achieved with hatchery production that does not advance recovery of ESA-listed salmonids as a key purpose of the plan.

Quantitative Performance Standards: (page 42)

An important performance standard that is missing in this plan is the cost-benefit ratio of hatchery produced salmonids. In 2002 the Independent Economic Advisory Board (IEAB) published its survey of selected hatchery costs and proposed to do a complete study that

included all hatcheries in the Basin, but phase II of that study was never approved by the Council and resisted by the staff.

The plan that does not include a standard for hatchery fish survival, contribution and cost fails to make hatchery production of salmonids accountable. Yet the plan seeks to make dam passage, reach survival run size and return rates among others, accountable. A standard for hatchery performance and accountability is also needed if for no other reason than to make the hatchery program transparent. Since these programs are paid for with public funds flowing to fish managers through electricity rates, federal funding and state funding, standards and accountability are necessary. Since the fish managers and the Council have continued to resist hatchery cost accountability, one can only assume that this is a sacred cow issue that will not be resolved in this plan or in the fish and wildlife program. It is important, however, for the cost to provide a fish that is harvested to be determined annually as a function of the performance standards of this plan if it is to adequately address accountability of the hatchery program.

Run Size and Return Rates: (page 42)

It is interesting to see that doubling the runs goal has once again become a Council goal. It was advanced in earlier fish and wildlife programs, but since progress on this goal failed to materialize, it was abandoned. As a performance standard this goal holds little meaning for it is not specific. If this performance standard is achieved with hatchery produced salmonids, would it be consistent with the Council's fish and wildlife program and would it be consistent with recovery of ESA-listed salmonids? If this performance standard were achieved with hatchery produced fish, it would increase the impacts on ESA-listed salmonids in the basin, so as a goal it lacks credibility.

In summary, I believe that there is a lot in the plan that is of value and can be used to improve the survival and health of salmonids in the Columbia River Basin. I offer my recommendations so that the plan can be even more effective. It would be unfortunate to have a plan that does a good job of collecting and documenting information about the condition of salmonids and their habitats but is not effective in providing the information and standards needed for recovery of ESA-listed salmonids.

Sincerely,

Bill M. Bakke,
Executive Director
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