Independent Scientific Review Panel
for the Northwest Power Planning Council
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204
isrp@nwppc.org

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MEMORANDUM

TO: **Mark Fritsch, NPPC Staff**

FROM: **Rick Williams, ISRP Chair**

SUBJECT: **Clarification on ISRP review comments on the proposed Shoshone-Bannock/Shoshone-Paiute Joint Culture Facility**

This memo responds to a May 4, 2001 memorandum from Mark Fritsch (NPPC staff) to the ISRP, in which the ISRP is directed to provide additional detail and clarification regarding review of the Shoshone-Bannock/Shoshone-Paiute Joint Culture Facility. The ISRP reviewed the Step 3 document of the SBT/SPT Joint Culture Facility (Project #199500600) in February 2001 and the Council, following the recommendation of the ISRP (ISRP 2001-3), did not approve the Step 3 Review.

We appreciate the concerns of the Council and the project sponsors in seeking additional clarification with respect to the review, while noting that responding at this level of detail to individual reviews is something the ISRP has rarely engaged in, finding it generally counterproductive to the independent peer review process. In this instance, we hope the additional communication will provide clarification and constructive criticism.

The communication from the Shoshone-Bannock and Shoshone-Paiute tribes requesting clarification was structured so that the ISRP concern or question was noted followed by responses from either the Shoshone-Bannock Tribes (SBT) staff or the Shoshone-Paiute Tribes (SPT) staff or both. Responses from each were color coded, so throughout the document, it was clear which comments came from the SBT or the SPT. While the Joint Culture Facility proposal is for a single artificial production facility jointly operated by the to tribes, the SBT and SPT proposed activities represent two programs that are quite distinct from one another. Consequently, our response deals first with the SPT redband portion of the proposal, then with the SBT portion of the proposal.

Shoshone-Paiute Tribe – Redband Portion of Joint Culture Facility Proposal

The need for an artificial production facility to support the SPT's proposed stocking of Lake Billy Shaw with indigenous redband trout is yet to be demonstrated, as the Sho-Pai tribal fisheries staff itself recognizes in its responses to ISRP concerns. Only after the distributional, abundance, and genetic assessment studies are completed on DVIR redband trout populations, can the need for an artificial production facility be assessed. These studies are presently underway.

Results of these studies should indicate whether DVIR stream redband trout populations are robust enough that they can be subsampled and used as stocking sources for Lake Billy Shaw, thus obviating the need for a redband production facility, or whether artificial production is needed to supply the stocking needs for Lake Billy Shaw. Until the studies are completed and an overall assessment occurs, any decision about the Shoshone-Paiute needs for a joint culture artificial production facility would be premature.

Shoshone-Bannock Tribe – Fort Hall Bottoms Portion of Joint Culture Facility Proposal

The response statements and questions from the Shoshone-Bannock Tribe appear to fall into several major themes, focusing on project justification, scientific-technical approach, the peer review process in general, and proposal preparation (e.g., specific questions about missing details in the proposal). Another major concern of the reviewers was that the proposal did not reflect current developments in conservation biology and fisheries science, particularly with respect to integration of recent relevant literature.

Recent Developments and Literature

Recent studies by Idaho Fish and Game, including genetic analysis of putative Yellowstone cutthroat trout populations in the upper Snake River system (above Shoshone Falls) indicate that numerous genetically intact Yellowstone cutthroat trout populations exist throughout the southeast Idaho area (Powell and Williams, unpublished data). Consequently, priority for the restoration of Yellowstone cutthroat trout in the Fort Hall Bottoms system seems uncertain. These data also suggest that numerous donor populations may exist from which translocations of Yellowstone cutthroat trout into the Fort Hall Bottoms system could occur, if the problem of continued hybridization with naturalized rainbow trout and the presence of brook trout can be successfully addressed.

As an example of the importance of non-native fish control, a recent publication in the North American Journal of Fisheries Management (Harig, A., K. Fausch, and M. Young. 2000. NAJFM 20:994-1004) examined factors influencing the success or failure of greenback cutthroat trout translocations as part of the ESA-driven restoration efforts for greenback cutthroat trout in Colorado. The authors found that one of the primary factors influencing whether a translocation succeeded or not, was whether non-native trout were present in the translocation site. Translocations at sites where non-native trout were

absent or had been eliminated were significantly more successful than efforts at sites where non-native trout existed. These findings have strong implications for the SBT's proposed restoration program for Yellowstone cutthroat trout in the Fort Hall Bottoms system.

Scientific Approach and Project Justification

It appears from the response that the project proponents have a very different understanding of the Council's review process than does the ISRP. They state repeatedly that the ISRP needs to tell them what to do that will result in funding for a hatchery. Their conceptual model for peer review seems to be: complete steps a, b, c, then build a hatchery. We, on the other hand, have been looking for biological/scientific justification that a hatchery was needed and would work to the benefit of, and not to the detriment of, fish and wildlife. The primary problem with the Shoshone-Bannock Tribe (SBT) portion of the Joint Culture Facility proposal is not just that it contains too little data or the wrong data; rather it is that the data available not only do not suggest that a hatchery is a good idea (in terms of benefit to fish and wildlife, production or protection of self-sustaining populations of wild fish and the ecosystems that sustain them, or other FWP and Gorton amendment criteria), they suggest it is a bad one, likely not to solve the problems present and likely to worsen some of the them.

Given the consistency the ISRP's Step 3 review with past ISRP reviews of the project, and the similarity of concerns raised by the Pacific Northwest National Laboratory in its Step 2 review of the project, it seems logical to suggest that the project sponsors radically revisit their proposed approach to restoring Yellowstone cutthroat trout populations in the Fort Hall Bottoms, rather than simply revising the existing proposal for resubmittal in the upcoming Upper Snake provincial review. Most native trout restoration programs in the western U.S. focus their efforts on habitat improvement or restoration and suppression or elimination of non-native fish. These actions are often accompanied by transplants of native fish from nearby populations into the restored habitat. Such an approach appears worthy of serious consideration in the Fort Hall Bottoms situation, as the initial review material suggests that such an approach is more biologically justified than the proposed approach.

However, until the status of Yellowstone cutthroat trout (YCT) populations in the area are much more thoroughly described than they were in the proposal (distribution, abundance, hybridization status, description of limiting factors, habitat status, status of non-native trout, etc.), it will impossible to determine whether they can be managed effectively to avoid continued hybridization with naturalized rainbow trout in the area and whether there is a justifiable role for an artificial production facility in their management. Statements in the Step 3 proposal and in the SBT response indicate that the project sponsors are unable or unwilling to remove rainbow trout from the system, placing any plan to restore cutthroat trout to the system in serious jeopardy, if not predestining it to failure. Presence of brook trout in the system is also troubling, and reviewers saw no indication of adequate assessment of that issue.

Proposal Preparation and the Peer Review Process

The ISRP review of the Step 3 proposal for the Fort Hall Bottoms portion of the proposed Joint Culture facility described many concerns about the project's approach and deficiencies in technical aspects of the proposal including the project's technical justification, literature review, data presentation, and proposed monitoring and evaluation plans. These concerns had also been noted in previous ISRP reviews and by the Step 2 review from the Pacific Northwest National Laboratory.

As noted above, a common theme in the response from the SBT was a call for the ISRP to identify specific levels of detail that are presently missing in the Joint Culture proposal (e.g., which specific reference citations, what additional data, what stocking densities, etc.). The ISRP has worked extensively with CBFWA personnel since the ISRP's formation in 1996 to define the elements of technically sound, logically persuasive proposals. In each of our annual reports reviewing FWP proposals (1998, 1999, and 2000), we identified a small number of proposals (2-4) that were very well written and could serve as models for other project sponsors. We appreciate the concern, as well as the evident frustration of the SBT project sponsors. Unfortunately, the ISRP cannot provide detailed specific guidance to individual project sponsors in proposal preparation without compromising our primary responsibility to the region to conduct peer review.
