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August 31, 2004

## MEMORANDUM

**TO:** Fish and Wildlife Committee

**FROM:** Bruce Suzumoto

**SUBJECT:** Summary of public comments on the Artificial Production Review and Evaluation (APRE) issue paper, Council Document 2004-08

The APRE issue paper was released for public comment on July 20, 2004 and the comment period was closed August 20, 2004. The Council received comments from the Colville Confederated Tribes, the Pacific Fisheries Management Council (PFMC), the Oregon Department of Fish and Wildlife, Trout Unlimited and Joel Freudenthal of Yakima, WA.

### Summary of comments

**Issue 1: In order to meet the harvest and conservation needs reflected in the vision, major changes to many hatchery programs are required.**

**[Colville Tribe]** "We agree that a new paradigm for basin-wide hatchery usage needs to be considered and should include an emphasis on population diversity and meeting local needs."

**[ODFW]** "While ODFW agrees with the Council's vision, we recognize that achieving a synthesis of the biological, economic, and social aspects of the vision is not a simple task, as these aspects are often in conflict with one another. In addition, ODFW hatchery programs operate under legal mandates and must continue to meet those obligations."

**[PFMC]** "The Council (PFMC) is cognizant of the need to reevaluate hatchery programs for compliance with new mandates and priorities such as the Endangered Species Act (ESA) and the Artificial Production Review process.... The Council staff recommends the Northwest Power and Conservation Council integrate its hatchery review process with the NMFS NEPA process, so common issues can be resolved in a compatible manner."

**[Trout Unlimited]** “We agree with the Recommendations but would like to see the Council propose a mechanism to start the discussion. The Council identified a leadership void in the APR document, but in this Recommendation appears to fall back on those vacant leaders to start the discussion. Stronger leadership is required to start the discussion.”

## **Issue 2: Promptly implement hatchery reforms**

**[ODFW]** “Where possible ODFW is reducing risks to natural stocks through the use of broodstocks endemic to the basins they are released into, the incorporation of natural-origin fish into broodstocks, limiting the access of hatchery-origin adults to natural spawning areas, and the passage of natural-origin adults above hatchery barriers.”

**[Trout Unlimited]** “Trout Unlimited agrees that prioritization is imperative. As pointed out in Issue 1, in order to promptly implement hatchery reforms, the discussion recommended in Issue 1 needs to happen on a previously identified timeline. We agree that prioritization should be closely tied to the vision statement but would add that it should be tied to recovery plans as well.”

## **Issue 3: Establish a results-oriented, performance-based management system to guide hatchery reforms.**

**[Colville Tribe]** “The development of solid performance based plans will ensure that investments being made throughout the entire Columbia River Basin are contributing effectively to the recovery of fishery resources.”

**[Trout Unlimited]** “Trout Unlimited supports a results-oriented, performance-based management system that is objective and measurable. However, we believe that an *ad hoc* oversight team should include public stakeholders and should have a more defined timeline and meeting schedule (as opposed to “periodic”).”

**[ODFW]** “ODFW agrees with the need for periodic reviews of hatchery programs to measure the success of hatchery programs and provide direction for program changes.”

## **General comments**

**[Colville Tribe]** “The CCT strongly supports and endorses the Northwest Power and Conservation Council’s leadership in hatchery reform, accountability and performance based outcomes associated with Columbia River hatchery programs.”

**[ODFW]** “In general, the Oregon Department of Fish and Wildlife agrees with the overall conclusion of the APRE Issue Paper.”

**[PFMC]** “The Issue Paper focuses the need to address priorities on the Columbia River basin and its component subbasins with no mention of the ocean fisheries and coastal communities which depend on Columbia Basin hatchery production.”

**[Trout Unlimited]** “[T]he dependence on HGMPs and NEPA to move forward with the realignment may be misplaced. Both of those processes have supposedly been moving “forward” for the last four years. Up until this point, public input and transparency has been limited at best. The Council should include a discussion as to how the APR process will move the HGMP and NEPA process forward or in the event that those processes do not move forward in a timely manner, identify an alternative process.”

**[Joel Freudenthal]** “Any hatchery reform package should recognize the competitive effect of hatchery fish on wild stocks in the mainstem.”