



**U.S. Fish and Wildlife Service - Pacific Region
Columbia River Basin Hatchery Review Team**

Columbia River Basin, Columbia Gorge Province

Little White Salmon, Big White Salmon, and Wind River Watersheds



**Carson, Spring Creek, Little White Salmon, and Willard
National Fish Hatcheries**

Assessments and Recommendations

Final Report, Appendix D:

Complete Text of Comment Letters Received from Stakeholders

December 2007

Appendix D: Complete Text of Comment Letters Received from Stakeholders



FISHERIES RESOURCE MANAGEMENT

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September 17, 2007

Mr. Douglas DeHart
Fisheries Hatchery Review Co-Chairman
911 NE 11th Avenue
Portland, OR 97232

Dear Mr. DeHart

The Yakama Nation Fisheries Program would like to commend U.S. Fish and Wildlife Service – Pacific Region (Service) for a very thorough review and assessment of Columbia Gorge National Fish Hatcheries programs and reform measures. These hatcheries support valuable and productive Treaty fisheries in the tribe's ceded lands, and they are essential components of our programs to rebuild stocks that have been diminished or extirpated by human development of the Columbia Basin. This in-depth report, with recommended alternatives, provides a solid foundation upon which to build our collaborative efforts to ensure that hatchery reform actions meet federal Treaty Trust responsibilities.

From our review, the Yakama Nation is encouraged to see recommended production actions that remain relatively consistent with current *US v Oregon* production. Like the Service, the Yakama Nation is committed to hatchery practices that meet harvest needs of the Pacific Northwest and local natural production objectives.

At this time there are two specific items we wish to bring to your attention for consideration:

- 1.) An alternative to the placement of a "conservation weir" in the lower White Salmon Subbasin. As the Service is aware, soon the first two years of juvenile chinook DNA analysis will be complete, with a third year of collection scheduled for spring 2008. With information from a complete dataset we suggest a re-evaluation of the conservation weir approach to determine its necessity. The Yakama Nation recommends continued collaboration with the recently formed tribal and multi-agency White Salmon Technical Group to identify possible alternatives. A possible solution may be a smaller conservation weir on Buck Creek (right bank tribe) of White Salmon River to establish a natural tule chinook reserve. Establishing a reserve on Buck Creek would allow for natural re-colonization of the mainstem White Salmon and allow for the continued use of the cold water refugia by migrating upper Columbia and Snake stocks.
- 2.) The Yakama Nation conditionally supports the use of Klickitat spring chinook natural production as the preferred stock to re-colonize the White Salmon Subbasin. If natural re-colonization does not occur after passage has been restored at Condit

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Dam, the geographic proximity of the Klickitat Subbasin and its hydrologic and geomorphologic similarity to the White Salmon make it the natural choice. The Yakama Nation expects our hatchery reform efforts being developed for the Klickitat Subbasin will lead to an abundant spring chinook run that can supply fish for this effort if needed. However, we will need to work with the Service and others to identify the level of production needed and its implications for management in the Klickitat before making a final determination.

The Yakama Nation is encouraged that this hatchery review effort acknowledges the importance of the Service's obligation to preserve, protect, and enhance Treaty Trust fishery resources and fisheries. We would also emphasize that any proposed changes to federal hatchery programs that result from this review are subject to an additional policy review and agreement by the *US v Oregon* parties. We look forward to working through the challenges ahead with the Service and others to find the proper balance of Treaty harvest obligations, non-tribal harvest opportunities, and natural production objectives for the entire Pacific Northwest region.

Sincerely,



Paul Ward, Manager
Fisheries Resource Management Program
Yakama Nation

Confederated Tribes of the Umatilla Indian Reservation (CTUIR)
Comments on Draft Gorge NFH Review

Brian Zimmerman – 8/10/2007

Carson CHS (p88): A general comment throughout this section is that it continually refers to reintroductions in the Umatilla River which Carson has not supplied production for since 2001 and is not anticipated to in the future. I'd recommend deleting references to the Umatilla River.

Carson CHS (p89): Objectives (3rd / 4th bullet) - the 250K for the WW is part of the 1.4M production goal not in addition to it. There are a couple other places this needs to be clarified like under Issue CA3 on p110.

Carson CHS (p89): Objectives (4th bullet) – These fish go to the WW not Umatilla.

Carson CHS (p97): Incubation and Rearing (last bullet) – There are a number of inaccuracies in this statement. LWS has reared fish for the Umatilla (210K not 250K) but this program has been transferred to Umatilla Hatchery. The program being transferred from LWS back to Carson is for the WW and is not Umatilla stock.

Carson CHS (p122): Alternative 1 Pros (3rd bullet) – Typo, should be Walla Walla.

Carson CHS (p122): Alternative 1 Cons (3rd bullet) – There is no data at this point to support the example that WW fish stray into the Tucannon. Not sure that this is a “con” when there is no information to suggest that there is even a problem. At the very least we would like to see the example deleted from the text if not the whole bullet removed.

Carson CHS (p128): Alternative 5 – This blanket statement about rearing fish for reintroduction is used throughout the document for other hatcheries as well. There are obvious fish culture issues involved in rearing some of these species at Carson and I think it would be appropriate to only identify those species which could realistically be reared at this facility.

Carson CHS (p129): Alternative 5 Cons (2nd bullet) – Not sure why this is a “con” when Carson has never been a part of JDM. I'd delete this bullet.

Carson CHS (p131): Recommended Alternative (Short term goal) – Two comments; 1) need to clarify that the on-station release for Carson would be reduced to 900K if the Kickitat program is implemented in addition to the existing WW program and 2) the last part of the paragraph needs to be specific that this program is for CTUIR and in the WW. CTUIR is concerned and wonders why this open ended language reference “for the Umatilla Tribe and states..... above John Day Dam” was included as well as the funding statement. Our position is that the WW program is not contingent on funding as you have stated but rather is one component of the total Carson CHS Mitchell Act program.

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Spring Ck Tule (p194): A general comment regarding this whole section is that it continually states that Alternative 1 and the Recommended Alternative are compatible with the USFWS JDM Reprogramming proposal. While the Spring Ck reduction is, the proposed LWS URB JDM Reprogramming component is in direct contradiction with your recommendations for that facility. It is very important that this issue be looked at in the bigger picture and clarify that if the reductions occur at Spring Ck that it would result in increases to the LWS URB program.

Spring Ck Tule (p195): Alternative 1 Cons (3rd / 4th bullet) – Not sure why these are “cons”. I thought a major part of the reduction at Spring Ck was to eliminate the need for March spill. If that is true then these are not “cons” but should actually be “pros” just like they are listed in the LWS URB section (p259).

Spring Ck Tule (p196/197): Alternative 2/3 – Same comment as Carson; there are obvious fish culture issues (especially URBs) involved in rearing some of these species at Spring Ck and I think it would be appropriate to only identify those species which could realistically be reared at this facility.

LWS URBs (p251): Alternatives – A general comment is that there are on-going discussions regarding utilizing LWS to provide brood/eggs for the Klickitat URB program and I didn't see this identified anywhere and it should probably be identified or included.

LWS URBs (p253): Alternative 1 Cons (4th bullet) – It appears outside the scope of this review for the HRT to make judgments/recommendations regarding the YIN program.

LWS URBs (p254): Alternative 2 – Do not understand alternative b) as written. It appears to be a typo or fragmented sentence. Please clarify.

LWS URBs (p262): Recommended Alternative (3rd bullet) – The alternative to reduce URB production at LWS (Issue LW5B – p245) keeps popping up throughout the whole section which is contradictory to the HRT recommendation to implement JDM Reprogramming.

LWS URBs (p263): Recommended Alternative (Short term goal) – This whole evaluation of the Priest Rapids program is way outside the scope of the HRT and inappropriate for inclusion here as it relates to LWS. If that program is so mismanaged then the HRT should not recommend utilizing that program for LWS. I would think the more appropriate recommendation would be “convert the LWS program to Priest Rapids stock contingent upon changes in that program”.

LWS URBs (p264): Recommended Alternative (Long term goal) – How would changing to Priest Rapids stock have any effect on straying of URBs to the Big White River? It probably wouldn't – but reprogramming more URBs upriver would. It would seem that somewhere in the Recommended Alternatives that the HRT would have specifically identified reprogramming of URBs to upriver release locations. While there are bits and pieces that may

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allude to this (Long term goal – bullet 3) no where do I see it specifically stated as an alternative.

LWS CHS (p290): Recommended Alternative – This recommendation seems shortsighted without the HRT providing a brood conversion/backup plan considering the issues with availability.

Williard (p314): Recommended Alternative (Short term goal) – Alternative 5 appears totally contradictory to the concerns expressed in the recommendations for LWS URBs.

LWS/Williard Complex (p316): Alternative 2/3 - Identifies “strong co-manager support” as a “pro” for both these alternatives. This is inaccurate as there have been major concerns expressed by co-managers regarding the F1 program being at the complex.

LWS/Williard Complex (p321): Alternative 4 – There is no discussion anywhere in the document regarding the potential use of Carson Depot Springs for incubation of eggs for the Klickitat URB program which is currently under discussion.

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NFS

NATIVEFISHSOCIETY

Conserving biological diversity of native fish and protecting their habitats

September 12, 2007

Douglas DeHart
U.S. Fish and Wildlife Service
ATTN: Pacific Region Fishery Resources
Science and Hatchery Reform
911 NE 11th Avenue
Portland, OR 97232

RE: Comments on Columbia Gorge NFH Assessment Report

Dear Mr. DeHart,

The Native Fish Society appreciates the opportunity to review the Columbia Gorge National Fish Hatchery Assessment Report and we provide the following comments for the record.

I have focused my review of this report on Wind River for it is a river I know well and it historically accessible only to native, wild summer steelhead above Shipherds Falls. Wind River summer steelhead are now listed as a threatened species under the federal Endangered Species Act. My comments are directed toward those Carson Hatchery impacts on wild native summer steelhead.

Shipherds Falls Fishladder:

In the 1950s a fishway was constructed at Shipherds Falls to provide passage for hatchery spring chinook. The first returns were in 1959.

The fishway is an infrastructure associated with the hatchery development for hatchery spring chinook development in Wind River; however, there is little discussion of its potential impact on native summer steelhead. Shipherds Falls was a major selective factor on wild native summer steelhead in Wind River and may have promoted morphological adaptations to successfully spawn in the river. Before the introduction of hatchery steelhead into Wind River and other adjacent watersheds, it was common for tackle store operators to identify one's catch based on the appearance of the fish from Wind River and other streams. The Wind River fish were uncommonly large and also had large caudal fins. These traits can be conferred on a population of wild steelhead by the habitat it uses to reproduce in. Also, Shipherds Falls created a hydrological barrier and prevented winter steelhead from entering the reproductive areas for summer steelhead above the falls. With the addition of the fishway

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winter steelhead, fall chinook, spring chinook, coho salmon and Columbia Basin hatchery steelhead strays have access to the Wind River above the falls. It can be expected that these non-native salmonids have an ecological impact on native, wild ESA-listed summer steelhead in Wind River. It can also be a source for genetic disruption from winter steelhead interbreeding and the potential transfer of disease into the watershed from other sources.

I recommend that the Shipherds Falls fishway be reviewed by the science team and options provided for its time of use. If Carson Hatchery is to continue operating and releasing non-native spring chinook into Wind River the fishway will continue to operate, but once the spring chinook run has passed the falls, the fishway should be closed, allowing only summer steelhead to jump the falls and once again be a selective factor on steelhead. During the time when spring chinook are migrating up Wind River they overlap with winter steelhead and summer steelhead. There is a trap at the upper end of the fishway that should be used during this time period to sort fish. The purpose would be to remove winter steelhead. By taking this action, the wild, native summer steelhead would be protected from interbreeding with winter steelhead. By closing the fishway, following spring chinook passage, the wild summer steelhead would be more likely protected from non-native fish such as coho salmon, fall chinook and Columbia Basin hatchery steelhead strays through the remainder of the year. Since the Washington Department of Fish and Wildlife no longer releases non-native summer steelhead from Skamania Hatchery in Wind River, the state no longer has an investment in operating the fishway to pass hatchery steelhead. However, since the WDFW has designated the Wind River as a wild steelhead gene conservation river, closing the fishway is consistent with this conservation management decision.

I would like to see the draft report discuss these issues and options in the final assessment.

Non-Native Spring Chinook Impacts on ESA-listed Wild Summer Steelhead:

Spring chinook are not native to the Wind River and were never present above Shipherds Falls prior to the 1950s when the falls were laddered for passing chinook and Carson National Fish Hatchery was converted to rear non-native spring chinook.

The assessment notes that non-native spring chinook pose a potential disease transmission and ecological impact on wild summer steelhead. Both of these issues are serious concerns for ESA-listed summer steelhead.

No disease transmission has been identified affecting wild summer steelhead, however, you know as well as I do, that there is very little effort to identify such impacts from hatchery fish on wild fish. There could be disease impacts that go unnoticed due to the lack of monitoring, and since this work can be expensive it is unlikely that disease impacts will be monitored in the future just as they have not been in the past. Consequently, the impact of disease is an unquantified threat to ESA-listed steelhead. It is only a matter of time before disease impacts are of such a magnitude that they are noticed. Consequently, I found the discussion of disease impacts from artificial production of spring chinook to be weak and there is no plan established in the assessment recommendations to deal with one when it happens.

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Naturally spawning spring chinook in Wind River creates an ecological impact on wild summer steelhead through competition for available food and space. In 2004 726 naturally spawning spring chinook were identified in the river (page 31). And in 2005 306 naturally spawning spring chinook were identified. A few of these chinook were natural origin fish which suggests that at least some spring chinook are reproducing successfully. However, Carson spring chinook are not known for their reproductive success as natural spawners. The assessment report states that naturally spawning spring chinook per year for brood year 1990-1999 was 195. The important factor is that there are naturally spawning spring chinook competing with wild steelhead for food and space in Wind River and there should be none. Even though naturally spawning spring chinook may not produce many adults, they can produce juveniles that compete with juvenile steelhead. The assessment report recommends that a weir be establish at the hatchery to collect all spring chinook. This weir should be a priority, but it will not eliminate the problem, for there is ample spawning habitat for spring chinook below the hatchery and they have been seen using those areas. The ecological impact of naturally spawning spring chinook on wild summer steelhead is an unquantified issue that should be addressed with a monitoring and evaluation program. The recommendation is to include such a program in the preferred recommendations with options for reducing the impacts.

Hatchery Water Withdrawal From Wind River:

I remember spring chinook having passed the entrance of the hatchery fishway and becoming stranded in Wind River adjacent to the hatchery due to low flows caused by water diversion from the river for the hatchery. At one time there was an emergency egg take done in the river to recover some of the eggs that would have been lost. It was disturbing to note the hatchery manager at the time assumed no responsibility for those fish and was unconcerned about dewatering the river because as he said, it was outside the hatchery fence. Hopefully, that attitude is no longer a badge of honor for Carson NFH staff, for it was the function of the hatchery that dewatered the river.

The assessment reports the water diversion screen does not meet fish protection specifications, but once fixed it can still be used to divert water from Wind River. The problem of dewatering Wind River and imposing a passage barrier to wild summer steelhead will continue. The assessment report does not discuss this issue. I recommend that this issue be resolved so that when water is diverted it no long represents a passage barrier to migrating steelhead. We support converting the hatchery water right to an instream water right in Wind River.

Spring Chinook Harvest And Impacts On Wild Steelhead:

The assessment report states that in 2001 almost 5,000 and 1,800 spring chinook were harvested in recreational and tribal fisheries respectively in Wind River. The mean sport and tribal harvests for 1989-1998 were 2,615 and 868 spring chinook respectively.

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The assessment report does not discuss the incidental mortality on wild ESA-listed steelhead in these fisheries. The by-catch of ESA-listed summer steelhead is caused by the enhancement of hatchery spring chinook in Wind River, so the by-catch and associated mortality to summer steelhead is directly related to the existence of the hatchery program. The first obligation is to determine the extent of the by-catch on an annual basis and the resulting mortality to Wind River summer steelhead. This information can then be used to design ways to reduce the incidental fishery related problem caused by Carson Hatchery spring chinook. I recommend that the assessment report include an action to determine the by-catch and associated mortality on ESA-listed summer steelhead in Wind River and to present options for reducing this mortality. This fishery could be selective for early returning steelhead, reducing genetic diversity, and it can have an impact on steelhead recovery by reducing steelhead spawner abundance. The wild steelhead run in Wind River has been substantially reduced and one year only 49 adult fish were counted. It is possible that this fishery has a large impact on wild steelhead and impedes recovery of this ESA-listed species.

Cost Accounting For Spring Chinook:

The assessment report discusses the benefits of harvest in terms of fish caught. However, the assessment does not include a cost to catch analysis for the hatchery product. An important part of any hatchery evaluation is the cost of operations and a part of that cost is the cost to produce a fish that is harvested in the various fisheries. The assessment supports additional investments of cash into upgrading the hatchery facility. Since this facility was created to enhance spring chinook harvests, it is only appropriate to display how much investment is required to provide the benefit of a harvested spring chinook. Since the Service is using public money to operate and upgrade this hatchery the public should be a full cost accounting of not only the expense, the need, and the benefits, but the actual cost of providing the benefit. Therefore a cost to catch evaluation is a key element. The assessment report does not include this cost to catch evaluation so the public cannot judge whether the hatchery is providing a chinook for harvest that is of reasonable cost. I recommend that the assessment report include a cost to catch evaluation for spring chinook salmon.

Size Spring Chinook Releases To Reduce Impacts on ESA-listed Steelhead:

Hatchery spring chinook survival averages 0.2% (SAR). From 1990-1999 2,575 spring chinook were surplus to hatchery needs and were given to the tribes. From 1955-1998 about 2 million spring chinook juveniles were released and since 1998 about 1.42 million are released. Hatchery releases are designed to compensate for the poor survival of the hatchery product and fulfill hatchery obligations such as provide spring chinook for reintroduction to other rivers such as the Walla Walla. However, the huge surpluses of adult chinook suggest that too many juveniles are being released to meet the hatchery needs and other uses. Since the spring chinook can have an impact on wild ESA-listed steelhead through ecological competition, disease transmission, and incidental mortality in various fisheries, the assessment report should review the number of spring chinook released in order to reduce these impacts. I was surprised that this issue was not evaluated by the science team, for it is an obvious issue affecting hatchery operations.

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Size Of Spring Chinook Releases and Predator Response:

The assessment report does not discuss the potential impact of spring chinook releases on wild steelhead related to predator attraction. This ecological issue is not mentioned and the report does not propose to monitor and evaluate it, so there are no options to reduce the problem if one exists. A number of studies have been conducted on predator attraction to hatchery released salmonids. It is, for example, a known fact that cormorants begin staging in Youngs Bay two weeks prior to annual releases of salmon from the hatchery. Research on estuaries has shown predator attraction to hatchery fish releases and impacts on wild salmonids. There is, of course the issue of Caspian terns on the lower Columbia River. Research by the USFWS on hatchery releases in the upper Columbia River identified predator attraction that harmed wild salmonids and they even gave it a name: the Pied Piper Effect.

It is disturbing that the assessment report did not address the effect of releasing 1.42 million spring chinook smolts and the impact that could attract and affect survival of ESA-listed summer steelhead. I can imagine that otters, birds, and mammals look forward to the swarm of juvenile hatchery chinook in the river. I would be surprised if Pikeminnow and birds were not staged in the river below the falls to intercept the multitude of spring chinook in entering the Columbia. The fact that these spring chinook are released at the same time that wild steelhead smolts are also migrating downriver, would suggest that the spring chinook are acting as a predator attractor that reduces wild steelhead survival. Predator attraction is an impact of the non-native spring chinook hatchery program and its impact on ESA-listed steelhead should be evaluated. Options to reduce this impact, whatever its size, should be presented.

In addition, the release of 1.42 million spring chinook into the Columbia River and its impact on wild salmonids is not addressed in the assessment. This review, like most such reviews, confines its impact analysis to the particular subbasin where the action agency is evaluating its foot print. To be comprehensive such a review should evaluate the cumulative impact created within and outside the subbasin where the project is located. In terms of predator attraction to hatchery fish releases, this assessment report does not address out-of-basin effects and therefore presents an incomplete cumulative impact analysis. The assessment report should acknowledge this problem and address it, providing options to reduce the impacts.

Cold Water Sources And Its Value To Wind River Wild Steelhead:

Carson National Fish Hatchery has captured Tye Springs, a cold water source (44 degrees F) for Wind River and an important ecological attribute for ESA-listed wild summer steelhead survival in the river. The assessment report states that Wind River has excessive warm water. Cold Creek joins Wind River downstream from the hatchery. His cold water stream gathers summer steelhead at its confluence, providing cooling water temperature relief for steelhead. It is likely, that Tye Springs provided a similar thermal refuge for wild summer steelhead, but they no longer have access to it. The assessment report does not discuss Tye Springs

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value as a thermal refuge for steelhead. This should be evaluated and options created to promote its use. If the hatchery degrades the cold water influence of Tye Springs and its value as a cold water source for Wind River steelhead, options should be developed to solve this problem. A pool at the hatchery outflow would allow steelhead to collect so that more fish could benefit from the cold waters of Tye Springs. Angling restrictions at that point would maximize the value of Tye springs.

Steelhead Carrying Capacity:

The assessment report says that “Due to the current abundance of steelhead in Wind River (near carrying capacity, Dan Rawding WDFW... the presence of a hatchery steelhead program would reduce the productivity of the natural steelhead.” (page 46). While I am opposed to adding hatchery steelhead to Wind River for whatever reason, this statement misrepresents the data provided in the report. On page 19 Table 1 displays the status of various salmonids, saying that historical numbers of wild summer steelhead were 2,000-5,000 fish. However, recent numbers range from 100-800 fish. It is likely that the historical steelhead abundance was greater than this table shows. For example, run reconstruction for the Stillaguamish River wild steelhead in the 1890s points out the run size was approximately 70,000 steelhead. The present run size is 500 and the management goal is 2,000. This information shows the magnitude of lost steelhead production and because the state did not embark on calculating the historic run size, it underestimated it. It is unlikely that the estimate of Wind River steelhead run size is any more accurate than that for the Stillaguamish. But if the information in Table 1 is taken at face value, the statement that the Wind River is near capacity for steelhead doesn't make sense.

The point is that there is still room for the wild steelhead population to grow and it is the job of the USFW to make sure and to verify that its operation of the Carson NFH is not impeding that recovery, including all the factors, related to the hatchery, that are likely influencing it provided in the comments above.

Alternatives:

For obvious reasons relating to expanding the risk to ESA-listed summer steelhead in Wind River I am opposed to Alternatives 2, 3, 4, and 5. That leaves the preferred Alternative 1 and Alternative 6, termination of the hatchery program.

To be acceptable Alternative 1 would have to include resolutions for the issues I have presented in my comments so that risk to ESA-listed summer steelhead is more fully addressed. The USFWS should also conduct a risk assessment of this hatchery program on ESA-listed summer steelhead in Wind River. Since this assessment report is primarily concerned with inside the fence hatchery operations and recommendations for improvement, it is not an adequate risk assessment for impacts to ESA-listed summer steelhead. Once that assessment is carried out and reviewed by independent scientists that have no stake in the hatchery project, a hatchery operation plan or its termination can be fully evaluated. As it stands, the assessment report is not an adequate risk assessment for ESA-listed summer

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steelhead and should not be treated as such. Only then can one, with confidence select either Alternative 1 or Alternative 6. Lacking such a risk assessment, my only conclusion would have to be for selection of Alternative 6, termination of the hatchery program.

Sincerely,

Bill M. Bakke, Director
Naïve Fish Society

USFWS Columbia Basin Hatchery Review Team
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LOWER COLUMBIA FISH RECOVERY BOARD

REGIONAL LEADER FOR RESTORING HABITAT AND RECOVERING FISH

September 17, 2007

Cheri A. Anderson
U.S. Fish and Wildlife Service
Columbia Gorge Information/Education Office
61552 State Route 14
Underwood, WA 98651

Subject: LCFRB COMMENTS ON THE COLUMBIA BASIN HATCHERY REVIEW TEAM (HRT) DRAFT ASSESSMENTS AND RECOMMENDATIONS – CARSON, SPRING CREEK, LITTLE WHITE SALMON AND WILLARD NATIONAL FISH HATCHERIES

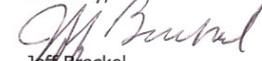
Dear Ms. Anderson:

The Lower Columbia Fish Recovery Board (LCFRB) appreciates the opportunity to review and comment on the U.S. Fish and Wildlife Service (USFWS) Columbia Basin Hatchery Review Team's (HRT) recommendations regarding the Gorge Province National Fish Hatcheries. Our review of the August 2007 draft report reveals that the proposed HRT recommendations are generally consistent with the goals, objectives and measures outlined in the Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan (LCFRB 2004). While we do not have detailed comments to offer at this time, we request the opportunity to provide input and recommendations as the broader hatchery review process in the Lower Columbia River moves forward.

Over the next six months, the LCFRB will be coordinating with the Hatchery Scientific Review Group (HSRG) and state and federal agencies to review the draft hatchery reform recommendations being prepared for the Lower Columbia River tributaries. In addition to the draft HRT Gorge Province reports, recommendations have also been prepared by the HSRG for Lower Columbia River Chinook populations. HSRG recommendations for the remaining populations (e.g., steelhead, chum, coho, etc) are forthcoming. Coordination between the LCFRB and the various state and federal partners is needed to ensure proposed hatchery reform actions are consistent with, and support implementation of, the Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan (LCFRB 2004) which was adopted by NOAA Fisheries in February 2006. Because recovery plan goals and objectives are integrated across all species and populations, a comprehensive evaluation of HSRG and HRT recommendations cannot effectively take place until after all species have been addressed.

Thank you for the opportunity to provide these comments. We look forward to coordinating with the USFWS as the hatchery review process moves forward. Please feel free to contact me at (360) 425-1553 if you have any questions or need additional information.

Sincerely,


Jeff Breckel
Executive Director

cc: Rich Turner, NOAA Fisheries
Patty Dornbusch, NOAA Fisheries
Guy Norman, WDFW
Ray Beamesderfer, Cramer Fish Sciences

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U.S. Fish and Wildlife Service
www.fws.gov

For Columbia River Basin Hatchery Review Information
www.fws.gov/pacific/Fisheries/Hatcheryreview/

The mission of the U.S. Fish and Wildlife Service is working with others to conserve, protect and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people.

December 2007

