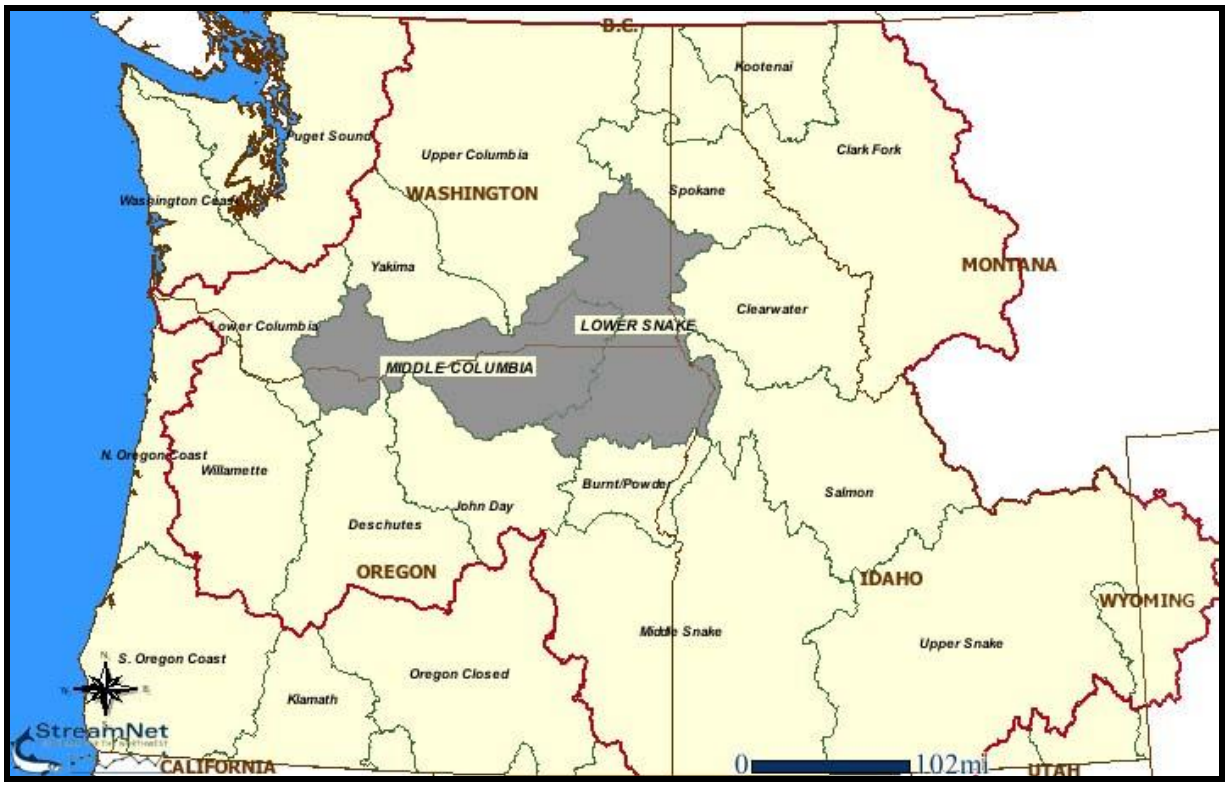
U.S. Fish and Wildlife Service - Pacific Region

Columbia River Basin Hatchery Review Team

Lower Snake and Middle Columbia Regions

Lower Snake Mainstem, Grande Ronde, Tucannon, Touchet, and Walla Walla River Watersheds



Washington Lower Snake River Compensation Plan State Operated Hatcheries

Lyons Ferry and Tucannon Fish Hatcheries

Assessments and Recommendations

Final Report, Appendix D:

Complete Text of Comment Letters Received from Stakeholders

March 2011

Please cite as:

U.S. Fish and Wildlife Service (USFWS). 2011. *Washington Lower Snake River Compensation Plan State Operated Hatcheries, Lyons Ferry and Tucannon Fish Hatcheries: Assessments and Recommendations - Appendix D: Complete Text of Comment Letters Received from Stakeholders. Final Report, March 2011*. Hatchery Review Team, Pacific Region. U.S. Fish and Wildlife Service, Portland, Oregon. Available at: http://www.fws.gov/Pacific/fisheries/Hatcheryreview/reports.html.

Appendix D: Complete Text of Comment Letters Received from Stakeholders

Confederated Tribes of the Umatilla Indian Reservation (CTUIR)[1,2]

Lyons Ferry Fall Chinook

Comment: Recommendation LF-FC1 states, "Establish natural spawning escapement goals the Clearwater River and the stretch between Lewiston and Hells Canyon reach of the Snake River upstream from Lewiston, Idaho. Correlate the number of fish released from each remote acclimation facility with the natural spawning escapement goals for each of those stream reaches and/or regions. Consider establishing a sliding scale that would reduce the number of fish released at each particular release site as a function of the number of naturally spawning adults within each of those regions."

I'm not sure I completely understand this recommendation. Establishing release numbers based on natural adult goals for specific areas within the basin is feasible and actually has been identified for some areas (such as the Clearwater through the NPTH Hatchery Master Plan). However, the sliding scale portion of the recommendation makes it sound like numbers would be adjusted annually which would be nearly impossible from a logistical/planning standpoint, especially considering the yearling portion of program. I would assume that any sliding scale would also provide for increased smolt releases as part of the same naturally spawning adult function.

Comment: Recommendation LF-FC4a states, "Broodstock management should focus on collecting broodstock at a rate that does not exceed 20% of the natural-origin spawning population and allow the pNOB value to vary among broodyears depending upon the abundance of natural-origin adults available for broodstock."

This is the current management strategy for the program as you identify in the issue statement. I'm not sure I understand how the recommendation is different than what is currently occurring.

Comment: Recommendation LF-FC4b states, "The Review Team supports comanager efforts to achieve a pNOB value = 30%, which is expected to reduce domestication risks, by trapping natural-origin fall Chinook adults at Lower Granite Dam. The likelihood of achieving this target could be increased by improving the broodstock collection and sorting capabilities at Lower Granite Dam (issue/recommendation #)."

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[1] *Written comments provided October 19, 2009 by Brian Zimmerman, O & M Project Leader, CTUIR.*

[2] *CTUIR provided informal and editorial comments to the Hatchery Review Team throughout the course of the review. The report has been edited based upon the comments received. The comments listed in this section are those that the Team believed required responses. The responses are provided in Appendix C.*

This recommendation appears to be in direct conflict with later recommendations regarding collection of brood from localized areas and not collecting broodstock at Lower Granite.

Comment: Recommendation LF-FC5 states, "Mark or tag all hatchery-origin fish in some manner so that they can be distinguished from natural-origin fish during broodstock collection. Consider using a marking method or methods which can be distinguished while the fish are alive to allow monitoring and sorting for passage to natural spawning areas as well as broodstock collection (see recommendation LF-FC14 regarding improvements to the Lower Granite trap)."

This recommendation appears specific to management at Lower Granite which does not match the later recommendations to collect brood from localized areas. If fish are not being managed at Lower Granite, I do not see the value in using a distinguishable mark for passage sorting. Are you suggesting that fish should be handled at Lower Granite and again at upriver stations?

Comment: Recommendation LF-FC6 states, "… Consider chilling eggs to equal out temperature units among egg takes and ultimately reduce size variability at the time of marking and tagging."

Currently, there are propagation difficulties at Lyons Ferry with getting subyearlings to size. Chilling eggs would exaggerate this problem.

Comment: Recommendation LF-FC7 states, "Explore opportunities for recapturing adult fall Chinook at Nez Perce Tribal Hatchery and Oxbow FH for developing local broodstocks for the Clearwater River and the Hells Canyon reach of the Snake River, respectively. Continue to maintain an integrated program utilizing adult returns to Lyons Ferry Hatchery and Lower Granite Dam for release of juveniles at Lyons Ferry FH to help meet LSRCP mitigation goals and harvest goals for the lower Snake River, to serve as a genetic reserve for Snake River fall Chinook, and to provide a source of fish for developing two localized stocks for the Clearwater River and the Hells Canyon reach of the Snake River, respectively. In particular, the Nez Perce Tribal Hatchery may be the appropriate place for developing an "early-run" fall Chinook population for the Clearwater River. Developing such a population is a long-term goal of the Nez Perce Tribe.

A. How would you suggest following your previous recommendation for inclusion of natural fish at a 30% rate from hatchery facilities where natural origin adults are unlikely to be captured?

B. Also, are you recommending that the "early run" program being developed in the upper Clearwater be the only program for the entire subbasin and that the NPTH/mainstem program be discontinued?

Comment: Recommendation LF-FC8 states, "As the number of natural-origin adult recruits increases over time, the number of hatchery-origin fish spawning naturally should decrease to allow the establishment of viable, self-sustaining naturally spawning populations. Ultimately, this might require the development of a sliding scale for the number of hatchery-origin fish

allowed to pass upstream of Lower Granite Dam. Modifications to the Lower Granite Dam collection and sorting facility (see recommendation LF-FC14) and/or improvements to mainstem collection sites downstream of Lower Granite (e.g. Ice Harbor) may be required to achieve this objective."

Ice Harbor was used for CHF trapping historically but was discontinued due to large numbers of out of basin CHF "nosing" into the lower Snake and being captured which artificially created the concern with Umatilla "strays". Since trapping was discontinued at Ice Harbor, straying concerns have significantly declined. While moving downstream to LoMo would allow for trapping the entire Snake River CHF population (including Tucannon and LFH), the further downriver you go the move logistical complexities arise with handling larger numbers of fish and additional groups.

Comment: Recommendation LF-FC10 states, "Discontinue backfilling other fall Chinook programs. If backfilling does occur, ensure that Lyons Ferry FH fall Chinook are differentially marked so that they are not included in the backfilled program's broodstock."

Some clarity is needed here. What are you defining as "other" CHF programs? If you mean out of basin programs (i.e. Klickitat) then this recommendation would be more appropriate for those programs rather than Lyons Ferry. If you mean IPC or NPTH then this recommendation takes on a whole different scope/meaning.

Comment: Regarding Recommendation LF-FC13, to "Assess the overall benefits and risks of releasing a proportion of each brood year as yearlings versus releasing all fish as subyearlings…" What are the risks you perceive with yearling releases? Why would you recommend discontinuing yearling releases if there is a perceived difference in life histories between the Clearwater and Snake? To be consistent with your recommendation of assessing life histories, I would think the recommendation would be more along the lines of prioritizing yearling releases in the Clearwater and subs in the mainstem Snake rather than just discontinuing yearlings completely.

Comment: Regarding Issue LF-FC14, "The sorting facility at Lower Granite Dam is inadequate as a broodstock collection site for the fall Chinook program." The issue your recommendation is based on identifies facility inadequacies for broodstock collection. Once again, this would be inconsistent with previous recommendations not to collect brood at Lower Granite. The recommendation itself appears more focused on upgrading the facilities for weir management.

In regards to the Recommended Alternative for Lyons Ferry Fall Chinook:

1a. Comment: I'm not sure the recommended Alternative to develop an early stock program is any different than what is currently being implemented. In addition, I'm not sure how you would implement #4 above from a logistical standpoint and still follow your recommendations.

1b. Comment: My understanding from the ICTRT is that the statement regarding the need to include one of the two extinct populations is incorrect. One highly viable population would meet recovery criteria**.**

1c. Comment: Not sure this statement is true related to NPTH. The facilities and programs are already in place and being implemented for both the CHF and early CHF programs.

Tucannon River Spring Chinook

Comment: Regarding recommendationTR-SC3, "Historical information suggests that the natural population has been below an R/S of 1.0 for an extended period. Discontinuing HOR releases above the weir could dramatically reduce the opportunity for Tribal fisheries in the basin."

Comment: Issue TR-SC9 identifies Rainbow Lake as a production water source and TR-SC10 identifies it as an emergency source. Probably should clarify.

Comment: Issue TR-SC13a has to do with poor smolt productivity for natural-origin spring Chinook in the Tucannon River but references a WDFW size-at-release study in the issue statemement. I do not understand how a hatchery size-at-release study could have any bearing on limitations for natural origin smolt productivity.

Comment: Recommendation TR-SC12 states, "Test for parasites, including *N. salmonis* , *C. shasta* and other myxosporideans, in Tucannon Hatchery juveniles (rainbow trout and acclimated steelhead, spring Chinook) and adults returning to the Tucannon River. Consider rearing spring Chinook from egg through smolt stage exclusively on Tucannon River water as a means to test for endemic parasites that may be infecting Tucannon River natural-origin fish. Alternatively, a net pen of Chinook salmon fry in Curl or Rainbow Lakes could serve as sentinel fish for monitoring of parasites. If fish parasites are found in the Tucannon River,, consider managing spring Chinook in the Tucannon River to enhance innate resistance to endemic parasites. This could include collecting natural-origin adults and rearing their progeny at Tucannon Hatchery on river water with some potential to significant mortality during the development of resistant offspring.

This recommendation to expose production to potentially significant health risks appears to be in direct contrast to previous recommendations to do exactly the opposite and limit health risk exposure.

Comment: Recommendation TR-SC13 states, "Spring Chinook observed at the Lyons Ferry outfall should be collected to determine their origin. Spring Chinook identified as Tucannon spring Chinook could be used as last-resort "backfills" to make-up for broodstock shortages resulting from the trapping of spring Chinook in the Tucannon River. However, the collection of broodstock anywhere other than the Tucannon River should be considered a "last resort" and generally discouraged."

This recommendation needs to be clarified. First it states that fish should be collected at LFH and then later says it should only be a "last resort" and "discouraged"?

Comment: Regarding recommendation TR-SC14, to "Conduct a pedigree analysis to determine and compare the reproductive success of hatchery and natural-origin Tucannon spring Chinook passed upstream of the weir." This recommendation seems to be in direct

conflict with your earlier recommendation to completely eliminate HOR releases above the weir?

Comment: Recommendation TR-SC16, to "Continue to investigate the degree of homing and straying and the potential causes…" should include analysis of where they are straying to.

In regards to the Recommended Alternative for Tucannon River Spring Chinook:

A) Comment: The HRT seems to have discounted the fact that establishing a weir in the lower Tucannon precludes access and lowers opportunity for sport harvest and essentially eliminates Tribal harvest in the Tucannon. As a result there are limited or no harvest benefits. Your following recommendations to discontinue passage of HORs above the weir will result in limited or no conservation benefit. No harvest benefit + no conservation benefit = no "stepping stone" program.

B) Comment: As stated previously, if you are recommending not allowing passage of "conservation" group fish there is essentially no conservation benefit. Why would you mine natural adults for brood with no proposed conservation use?

C) Comment: The Review Team states, "…For example, if the Team's recommended alternative was chosen, then gametes collected from the integrated component in excess to the conservation objectives in the Tucannon River (harvest component)…" This statement is unclear to me. I don't see where the reference to the harvest component has any bearing on the rest of the statement. Is the parenthetical description a typo? Also, I'm not sure why the Aostin reintroduction would have any negative effect on harvest in the Tucannon. Based on your recommendations, there would be no hatchery fish released above the weir (and no harvest above that point) so any hatchery fish arriving at the weir would theoretically be excess and avaialbe to use for Asotin. Also, why not start the Asotin program using surplus "harvest" group adults for brood rather than "conservation" adults.

Lyons Ferry Hatchery Summer Steelhead

Comment: Regarding recommendation LF-SS2, to "Continue to spawn two males with every female, but subdivide the eggs of each female in approximately equal proportions and fertilize each subgroup separately with a different male…" How about spawning at a 1:1 ratio and using a second male as a "back-up"?

Comment: I'm not sure that the statement under issue LF-SS4 about the weir being located below the spawning grounds is an accurate assessment.

Comment: I'm assuming that the statement under issue LF-SS5 about being under the 5% threshold must be based solely on Nursery Bridge data. I don't think there is any data on mainstem or mainstem trib spawning composition.

Comment: Regarding issue/recommendation LF-SS7, it doesn't appear that cold water disease has had a big enough impact on production based on release data to recommend reducing production levels.

Comment: Issue and recommendation LF-SS10 state, issue "…Crowding, loading and transport is stressful to fish and may affect post-release survival…. Recommendation LF-SS10: Assess the level of stress and oxygen content in the water in the raceways and lakes during crowding and loading and assess post release survival 24 to 48 hours after release to ensure that there are no issues..." This has been the SOP at LFH for years and they keep cutting back production due to high SARs. How big a problem can it be?

Comment: The Tribe would like to see the potential for initiating an endemic mainstem Walla Walla summer steelhead program identified somewhere in your recommendations/alternatives especially since it is identified in the Accords project list.

In regards to the Recommended Alternative for Lyons Ferry Fall Chinook

Comment: Your long term recommendation does not acknowledge recent management history. This is exactly the same scenario that everyone went to court over in the 90's only with spring Chinook. In that case, Rapid River stock, an indigenous Snake River spring Chinook stock, replaced the non-endemic Carson stock at Lookingglass Hatchery. Soon after the change however, it was perceived that Rapid River stock also was unsuitable because, while indigenous to the Snake, was not endemic to the Grande Ronde Basin. This recommendation appears to be headed down that same exact path.

Cottonwood Creek Hatchery Summer Steelhead (Wallowa Stock)

Comment: In recommendation WA-SS2 you appear to recommend that the broodstock for this program should not be Wallowa. Since they are both "out of basin" stocks why not recommend converting to Lyons Ferry FH steelhead and reducing the propagation impacts at Lyons Ferry FH that you've identified? Also, Lyons Ferry steelhead do not appear to have the lower river straying issues either.

Comment: An Alternative under consideration by the co-managers is to replace the Wallowa stock used for this program with the Lyons Ferry steelhead stock.

Touchet River Summer Steelhead

Comment: Issue TT-SS1 states, "The Review Team understands that the short-term goal of the program is to "evaluate the capability of developing an endemic Touchet River hatchery stock that can replace the Lyons Ferry stock for meeting harvest mitigation goals while, at the same time, reducing genetic and demographic risks to the natural population of steelhead in the Touchet River." The Team further understands that the purpose of the endemic broodstock program is NOT, at the present time, to restore or rebuild the naturally spawning population in the upper Touchet River via natural spawning supplementation by hatchery-origin fish. This latter goal could be a FUTURE purpose of the program but only if the CURRENT research goal of the program is first achieved and the capability to expand the program demonstrated."

The CTUIR disagrees with the highlighted statement. This is the WDFW perspective. The CTUIR's position is that it is for supplementation.

Comment: Recommendation TT-SS2, states "Collect steelhead for broodstock from the entire spectrum of the run." Why wouldn't this recommendation be expanded to include the late portion of the spawning spectrum into a 2 year smolt program?

Comment: Recommendation TT-SS7 states, "Discontinue outplanting fry. If the program size is increased, consider sampling the fry for viruses and retain and rear the group to smolt-stage only if they are IHN virus negative." I don't understand the second part of this recommendation. If the program size is increased the fish would all be programmed as smolts and there would be no "surplus" to outplant as fry.

Comment: Regarding issue TT-SS9 that states, "…steelhead of smaller size at release may increase the potential for those steelhead to residualize…" I thought most current data suggested just the opposite – that large fish had a higher tendency to residualize.

Comment: Issue TT-SS12 states, "Touchet steelhead have a high degree of straying upstream of Ice Harbor dam…Current hatchery practices may be contributing to these stray rates, including the practice of rearing the fish to smolt stage at Lyons Ferry FH, then transporting them and direct stream releasing them in the Touchet River, posing genetic and ecological risks to other steelhead stocks." I disagree with this assessment. Almost every single west slope Blue Mountain stream has flow issues in the fall when STS first arrive in the tributary areas which does not allow for entry and leads to straying. Straying has been identified as an issue with hatchery and wild Tucannon fish, WW, Touchet, and even wild John Day fish. If wild fish are straying at similar or higher rates how can you attribute it to hatchery practices? All these types of recommendations do is provide ammunition to further advance anti-hatchery agendas when in all likelihood it has nothing at all to do with hatchery practices and everything to do with Mother Nature.

In regards to the Recommended Alternative for Touchet River Summer Steelhead

Comment: Why would you suggest implementing a "stepping stone" alternative when there is no conservation benefit? It makes no sense to implement this type of program when you are trying to manage for a PHOS of 0.0. In addition, there needs to be an acknowledgement that implementing "stepping stone" programs will increase the logistical problems/issues with rearing containers and space at the facility by increasing the # groups or programs that need to be propagated.

Tucannon River Summer Steelhead

Comment: Recommendation TR-SS4 states, "Collect steelhead for broodstock from the entire spectrum of the run." Why wouldn't this recommendation be expanded to include the late portion of the spawning spectrum into a 2 year smolt program?

Comment: Recommendation TR-SS5 states, discontinue passing hatchery-origin steelhead upstream to spawn naturally. Upstream of what, the hatchery weir? Most STS spawning in the Tucannon occurs below the hatchery weir.

Comment: Recommendation TR-SS8 states, "Discontinue outplanting fry. If the program size is increased, consider sampling the fry for viruses and retain and rear the group to smolt-stage only if they are IHN virus negative." I don't understand the second part of this recommendation. If the program size is increased the fish would all be programmed as smolts and there would be no "surplus" to outplant as fry.

In regards to the Recommended Alternative for Tucannon River Summer Steelhead

Comment: The recommendation doesn't accomplish either of these goals. To reiterate my spring Chinook comments, A) the HRT seems to have discounted the fact that establishing a weir in the lower Tucannon precludes access and lowers opportunity for sport harvest and essentially eliminates Tribal harvest in the Tucannon. As a result there are limited or no harvest benefits. B) Your recommendations to manage for a PHOS of 0.0 above the weir will also result in limited or no conservation benefit. No harvest benefit + no conservation benefit = no "stepping stone" program. Why would anyone suggest this type of program with all its associated logistical difficulties with no discernable benefits? Seems like the perfect location to recommend a segregated hatchery program.

Comment: How would implementing this strategy at the existing weir accomplish any of your goals when the existing weir is located above the majority of the primary spawning area?

Washington Department of FISH and WILDLIFE

SE WA District Fish Management, Region 1,
529 W Main St., Dayton, WA 99328, Phone (509) 382-1005, Fax (509) 382-1267

October 29, 2009

To: Michael Schmidt, USFWS Hatchery Review Team Facilitator

From: Glen Mendel, Fish Management Biologist for SE WA

Subject: WDFW comments on HRT Review of SE WA Hatchery Programs

We appreciate all the time, effort and thoughtful consideration the Hatchery Review Team (HRT) put into reviewing the programs and operations of the Lyons Ferry Hatchery Complex in southeast Washington.

WDFW staff previously reviewed the preliminary draft of the HRT comments and recommendations and provided you numerous responses prior to the recent public meeting and public review and response process. WDFW will continue to review, consider, and respond to the HRT comments and recommendations regarding the hatchery programs in southeast Washington as part of development of our Hatchery Genetic Management Plans (HGMPs), Regional Steelhead Management Plan, and other planning efforts for southeast Washington (e.g. Salmon Recovery Planning and implementation).

Thank you again for your perspectives and valuable input regarding our hatchery operations and goals. We will thoroughly consider your comments and recommendations and we intend to implement many of your suggested changes in our hatchery programs. However, we find that some of the suggested changes to our hatchery programs are unlikely to be implemented given the constraints of other fish management goals and legal agreements that are extant for the Snake River Basin and southeast Washington.

If you desire further clarification of our comments or wish to discuss our responses, please feel free to contact me. Thank you.

From: Brad Johnson <bjohnson@asotinpud.org>
09/30/2009 09:58 AM

To Don_Campton@fws.gov
cc: Douglas Mattoon <dmattoon@co.asotin.wa.us>, Steve Martin <steve@snakeriverboard.org>

Subject: Columbia Plateau and Blue Mountain Provinces Comments

Good Morning Don,

I would like to thank you and the others for taking the time to come out and explain the Hatchery Review Teams process and provide public information. I am looking at the HRT review from the point of habitat restoration projects that have occurred within the Tucannon and Asotin Creek watersheds and recreational sport fishing opportunities. The Asotin Creek, Pataha Creek and Tucannon River were identified as "Model Watersheds" in the early 90's by Bonneville Power Administration. With this context, there has been numerous instream, riparian and upland best management projects completed with salmonid protection and restoration being the main goal. As I stated last evening, the Tucannon River and mainstem Grande Ronde are the only tributary system that currently have sport fisheries and with that in mind please consider the following comments.

1. I believe the US Fish and Wildlife Service needs to include an economic analysis of reduced juvenile releases in the Grande Ronde and Snake River tributaries within Washington/Oregon. Without hatchery releases there would be no steelhead or salmonid fisheries in SE WA, OR or ID.

2. Was there an attempt to look at population within this region and identify areas for wild stock protection and continue to provide sport fisheries where historic sport fishing and tribal harvest have occurred? For steelhead it seems obvious that the upper reaches of the Touchet and Tucannon could be used for wild fish and the lower reaches could maintain current or increased harvest levels. Tributaries such as Alpowa, Asotin, Tenmile and Joseph creeks to name a few could be continued to be managed for wild steelhead production with no hatchery releases of steelhead.

3. Why would the HRT even include an alternative to discontinue a hatchery program within this region? The Lower Snake Compensation Plan is to provide sportsman and tribal fisheries with harvestable surplus. For example; the goal of 18,300 fall Chinook is for the region above Ice Harbor, what about the 100,000 plus for recreational and tribal harvest that is above and beyond the 18,300? Has that portion of the goal been met? To have a recommendation to elimination these hatcheries and still have the four lower Snake River dams in place seems odd.

4. In years with large returns of hatchery fish there should be a recommendations to make in-year adjustments to increase hatchery bag limits in September, October and November when the fish are in good shape and fishermen would be inclined to take the fish home instead of catching and releasing them later in the season when they are less desirable to eat.

5. There have been numerous partnerships built at the local level and many miles of stream and riparian habitat protected and restored. It would be a disservice to the residence along the Tucannon River if there were no sport fisheries. This would be an economic impact to a rural

region that could not be supported and more importantly it wouldn't help relationships with project implementers and WDFW fisheries biologists if this was to occur.

6. Could you please provide an example of where the stepping stone program has worked (at the meeting there was discussion of the Idaho Supplementation Study and I cannot find where it continued past 1994)? Was it successful? It doesn't appear to be a good fit for the Tucannon River based on the fact the wier/trap would be near the mouth and there would be no fisheries available if all hatchery fish were removed at the trap.

7. The DRAFT report is hard to follow and appears that recommendations seem to be inconsistent within individual programs, the Lower Snake Compensation Plan and HSRG recommendations. An example would be the Cottonwood facility. There was discussion to reduce the releases from this facility. Earlier when there was discussion about reducing hatchery releases for both the Touchet and Tucannon it was recommended to increase the Cottonwood facility. It was hard to follow recommendations and it would be easier if all recommendations were put together to ensure they were consistent with both Hatchery and Acclimation facilities. The goals of the program were mentioned and it seemed to me that discussion occurred with regards to what each facility needed for production, it didn't seem that you talked about the harvestable surplus goals. I understand they are recommendations and appreciate the opportunity to comment.

Thanks for the opportunity to provide comments.

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Snake River Salmon Recovery

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November 30, 2009

U.S. Fish and Wildlife Service
Attn: Don Campton, Hatchery Review Coordinator
Fishery Resources
911 NE11th Avenue, Portland, OR 97232

Dear Mr. Campton:

To begin, we appreciate the USFWS Columbia Basin Hatchery Review Team's (HRT) effort to assess and develop recommendations regarding the operations of Washington's lower Snake River compensation plan state operated hatcheries. We particularly appreciate that the recommendations in the September 2009 report carry no authority by themselves but rather are to inform other hatchery policy decisions (HGMP, FMEP, etc) in the Columbia basin. However, we understand that hatchery funding policies will likely be influenced by the recommendations in the report which is a concern for reasons that we offer in the following comments.

The Snake River Salmon Recovery Board (www.snakeriverboard.org) developed a plan for recovering salmon and steelhead in the Snake River region within Washington including the Walla Walla watershed, in 2005. That recovery plan was approved by NOAA Fisheries in the same year. The recovery plan represents a balanced approach that is technically sound and feasible, and is supported by those with the authority to ensure that it is implemented. The recovery plan has a strong emphasis on habitat protection and restoration but also provides a hatchery strategy to compliment habitat improvements. The habitat strategy, once fully implemented, is expected to support a complimentary hatchery strategy. In a simplified description, our habitat strategy is to protect and restore, where needed, mid to upper reaches of each Major Spawning Area. We support a hatchery strategy which utilizes artificial propagation as a rebuilding tool to help achieve natural production and to meet fishery goals. The intent is to minimize impacts on natural stocks with emphasis on rebuilding natural production in enhanced but currently underutilized habitats. Habitat and hatchery strategies should not counter one another but work as complimentary actions toward achieving our primary rebuilding goal. This combination strategy will achieve our VSP criteria for most of our populations within 15 years while maintaining vibrant fisheries in lower reaches of tributaries and in the mainstem Snake and Columbia rivers. The Recovery Plan contains numeric goals for the number of hatchery adults as well as numeric goals for natural returning adults. It also contains harvest goals. These goals should be referenced in the HRT report.

It was disturbing to hear at the outreach gathering in Walla Walla on September 29 of this year that the HRT members "have heard of the federally approved Salmon Recovery Plan for Southeast Washington but have not read it". We, along with our local, Tribal, State and Federal partners invested more than four years in developing the recovery plan and are actively implementing the habitat strategies while our co-managers are implementing the hatchery strategies and actions identified in the recovery plan. Tangible evidence that our co-managers are actively implementing these hatchery strategies includes (1) reducing the number of smolts produced from out-of-basin adults that are released into the Snake River and its tributaries identified in this report, (2) shifting the smolt release locations further downstream in some tributaries to help reduce potential impacts to natural production, (3) assessing the efficacy and risk of converting to an endemic broodstock in the Tucannon and Touchet, (4), carefully managing wild and hatchery fish disposition at weirs in the Tucannon, Asotin and Touchet systems, and (5) retaining hundreds of hatchery marked fish trapped at the Lyons Ferry Hatchery. Harvest managers have agreed to increase the daily harvest limit from

three to five, hatchery marked steelhead as yet another strategy to take advantage of available hatchery fish and reduce their abundance on the spawning grounds.

We are also concerned with the reliance on the results of the Ecosystem Diagnosis and Treatment results provided in the subbasin plans for what appears to be a conclusion that natural production is severely limited by habitat conditions so hatchery reform is critical at this time. The EDT assessment referenced in the Report was based on habitat conditions and data that are now close to a decade old; much has changed since the 1990's. Water temperatures are lower, flow is increased, sediment levels have decreased, dozens of passage barriers have been removed, nearly 1,000 diversions are now properly screened, hundreds of in-stream habitat structures have been installed and miles of floodplain have been reconnected within the region. During this same time period, the percentage of unmarked steelhead crossing Ice Harbor dam has roughly doubled, increasing from about 12% to almost 25% this year. The report suggests that hatchery production and management must be radically altered almost immediately for conservation (recovery) of species within our region. We disagree to a wholesale change (e.g., stop LFH smolt releases in the tributaries and convert to a stepping stone program based on the use of endemic broodstock) but do concur with some of the recommendations. We support incremental hatchery management changes (e.g., a pilot study to evaluate the success of an endemic broodstock program; continued removal of hatchery marked adults at weirs; increased daily catch limits for hatchery adults, etc) only if the changes are evaluated and supported by long term data sets to support large scale changes. In a nutshell, the ecosystems are improving and we fully expect natural populations to continue improving.

The economic benefit of the fisheries in southeast Washington noted in the report is significant. The importance of these fisheries to salmon recovery is more than retail dollars and cents. Stakeholder investments and commitments are paying off and today's success has set a solid foundation for future improvement in our ecosystems and persistence of strong natural populations. The risk of compromising regional stakeholder support by terminating or even impairing fisheries due to wholesale changes in hatchery management must be avoided because the ecosystem that these species depends on is largely in the hands of those with the ability to manage it in a manner inconsistent with the needs of these species. Today these species exist in an ecosystem that is much better than it was just a short decade ago and we can't risk going back. We can continue to improve VSP parameters of our natural populations and minimize risk to their persistence in a manner that achieves our goals of salmon recovery and maintaining fisheries without wholesale changes to our hatchery programs.

We support strategies which expedite recovery of natural production and reduce the need or reliance upon the hatchery tool over time. Any changes to hatchery programs in response to HRT recommendations must be informed by and consistent with existing legal and policy mandates as well as consistent with available funding for implementation. Important factors in determining the level and timing of implementing specific recommendations (e.g. achieving less that 5% hatchery fish on a spawning ground) are current population abundance and seeding levels. We would likely not support immediate implementation of such recommendations in areas where natural production capacity is predominantly underutilized. In summary, strategies to achieve our goals must consider multiple technical, policy and legal factors which must be all recognized and balanced in order to make proper case-by-case decisions.

We appreciate your consideration of our perspectives. If you have any questions you may direct them to our Director, Steve Martin (509) 382-4115 or via email at steve@snakeriverboard.org

Del Groat

Del Groat, Chairman Snake River Salmon Recovery Board

cc: Phil Anderson, Director, Washington Department of Fish and Wildlife

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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.

March 2011