

Native Fish Society

Memorandum

10-26-09

TO: Don Campton, USFWS

FR: Bill Bakke

RE: Comments on draft LSRCP Idaho Hatchery Review

Clearwater R. B-Run Steelhead

The Native Fish Society supports the recommendation of alternatives 1 and 4 which would terminate outplanting of Dworshak Hatchery steelhead stock (B-run) into Lolo Creek and the upper South Fork Clearwater River. This would also terminate the transfer of eggs to southern Idaho hatcheries for inter-basin stock transfers into the upper Salmon River.

Since Lolo Creek and the Lochsa River steelhead are non-viable populations of wild native steelhead determined by the Interior Columbia Technical Review Team, terminating these hatchery stock transfers is biologically sound and necessary in order to recover ESA-listed steelhead. It is disappointing that Idaho Fish and Game has not come to this conclusion long ago, given what is known about the impact of hatchery fish on locally adapted native, wild steelhead. This information has been available since Willis Rich's work in 1938 and confirmed by Reisenbichler and McIntyre 1978, Araki 2007, 2008 and comments from Dr. Blouin regarding the native broodstock work on Hood River steelhead.

We support termination rather than some form of stock transfer reduction into these streams. A reduction is not an adequate protective measure for these steelhead populations and does not support recovery of what are now non-viable populations protected under the federal Endangered Species Act.

We disagree with the decision to continue transfers of Dworshak Hatchery steelhead into the Little Salmon River regardless of the conditions stated by the team that there would be limited impact on wild steelhead. This overlooks the potential for straying into other natural production areas and it perpetuates the continuation of inter-basin stock transfers.

We support the development of a local hatchery broodstock for the SF Clearwater River, Crooked River and Red River facilities because it would be a major improvement over transferring hatchery steelhead into these areas. It would potentially improve survival, performance and contribution of these steelhead over what exists today. It would also potentially contribute to improved natural spawning success. The goal of this program should be to re-establish a viable naturally produced population of steelhead. The development of a local hatchery stock may help in achieving this goal. Our concern with this recommendation is that it requires a date certain for making this shift in artificial production. At this time the team has not supplied a time line and process for making this change happen in a timely manner.

Magic Valley Fish Hatchery B-Run Steelhead:

The Native Fish Society agrees with the recommendations for terminating the Upper Salmon River B-Run steelhead program.

We also agree with termination of Dworshak Hatchery B-run steelhead releases into the EF Salmon River. Your reasoning for terminating this program is scientifically sound and would contribute to the recovery of the local steelhead population.

We also agree with termination of the Upper Salmon River B-run hatchery program as well as the EF Salmon River and Squaw Creek releases for the reasons provided.

We do not support continued release of Dworshak Hatchery B-run steelhead into the Little Salmon River. It is not enough to allow this program to continue without specific scientific evaluation of its impact on wild steelhead. It is unacceptable for the team to say it “accepts the current management rationale that this release does not pose a risk to natural steelhead populations.” Straying of non-native hatchery fish is a potential problem and natural spawning may take place in the Little Salmon River and other streams. The only way to determine these potential impacts is to conduct the appropriate studies to evaluate the risk of this program. A risk assessment based on an inventory of stray steelhead is required before approving continued release of Dworshak B-run hatchery steelhead into the Little Salmon River.

Magic Valley Fish Hatchery A-Run Steelhead:

The Native Fish Society supports Alternative 2 that would establish a native broodstock hatchery program in the Salmon River. An integrated hatchery program may improve survival and contribution to the fishery as well as mitigate impacts of hatchery fish in the Salmon basin as well as in other streams where these fish stray such as the Deschutes River. This should be the preferred alternative that moves this program in the short term rather than the long term.

East Fork Salmon River “Natural” Steelhead:

We support implementation of Alternative 3 that would expand the EF Salmon so-called “naturals” program. This would replace the inappropriate release of non native Dworshak B-run steelhead and improve the hatchery program for all the reasons noted in your recommendation. Implementation of Alternative 3 should be moved from the “go slow” track to the “get it done now” track.

Conclusions:

By focusing on hatchery impacts to wild salmonids, the team of scientists have made an important contribution for the improvement of existing hatchery programs. Even though there is unfortunate “go slow” slippage in some recommendations, the overall direction appears to be sound.

Since none of the wild steelhead populations in the Clearwater and Salmon basins are viable based on work done by the ICRTRT, and these populations are listed as protected species under the ESA, there should be some urgency created to reform hatcheries so they have less impact on wild populations. It is our recommendation that these programs

be re-evaluated in the next five years to determine whether the recommendations were actually implemented. In the meantime a hatchery risk assessment, built upon your review, should be completed for each hatchery program.

At some point an evaluation of wild native steelhead in the Clearwater and Salmon basins should be completed to fully describe the management situation in these basins and the best way to resolve problems that may be impeding recovery of viable wild steelhead. We spend a lot of time and money looking at the hatchery programs, and many have been done, but wild salmonids have not received the same attention. Each wild population should be evaluated and recommendations for their recovery agreed to by the management parties. Of course the work already completed on the hatchery programs and the work of the ICRTRT would make a large and important contribution to such a wild salmonid evaluation. For each population there needs to be a management plan with biological objectives. These would be evaluated and updated on a regular basis.

In addition to the hatchery reform, the review should capture the larger picture of these hatcheries and their role in harvest, cost of production, stray rates, marking for identification, etc. so that the impact of these hatcheries throughout the Columbia Basin is understood better than it is now. Releasing unmarked steelhead is difficult to justify, but heroic efforts have been made even though they are contributing to management problems on a broader scale than just the Snake Basin streams. It is not enough to confine the review of these hatcheries to a particular stream because not all of the issues related to a hatchery program can be identified and solved.

Hatchery production is mitigation for dams. An important part of their evaluation includes the cost to produce a fish that is caught in the fisheries being mitigated. Since these hatchery fish are paid for with public funds, a cost effectiveness assessment is an integral part of any evaluation. The U.S. Fish and Wildlife Service and its partners in this hatchery review should either fund an economic study of the mitigation hatchery program or request that the Independent Economic Advisory Board complete its proposed economic evaluation of all Columbia River hatchery programs.