

12-12-09

From: Bill Bakke, Native Fish Society
To: Michael Schmidt, Long Live The King
RE: Comments on LSRCP Hatchery Evaluation for Little Sheep Creek

LSRCP HATCHERY EVALUATION – LITTLE SHEEP CREEK

Problems Identified:

The cost to produce a fish for harvest are not displayed
Genetic conservation is not included in program page 219
List of conservation benefits limited to “enhancing ecological processes” page 220
Naturally spawning hatchery fish poses a risk to the wild population page 220
High density rearing increases risk of disease
Hatchery releases residualize in stream and increase risk to wild listed fish p. 220
Hatchery fish stray into rivers such as the Deschutes and cause risk to wild fish p. 219

Dam passage mortality increases risk to wild fish abundance and hatchery fish adds a layer of additional risk to reproductive success of wild fish p. 221

Hatchery fish outplanting (adults and juveniles) “poses a significant domestication risk and likely loss of fitness of naturally spawning steelhead population in Big Sheep Creek.” P. 221

Release of untreated effluent from hatchery spawning poses water quality risk and health risk to wild fish downstream of L Sheep Creek facility. P. 221

Weir design poses risk to juveniles migrating down stream p. 221

“Hatchery releases that residualize in the stream can pose competition risks to natural origin salmonids in Little and Big Sheep creeks and Imnaha River.” P. 221

“Outplanting of hatchery adults (average 1000 annually) is likely to cause adverse ecological interactions. It is likely this reduces juvenile survival and natural productivity of wild steelhead in Big Sheep Creek.” P. 221

No research identified. P. 221

LSC-SS1 P. 222: No cost to catch evaluation recommended. Does the LSRCP have a harvest and recreation benefit goal? Mitigation is constructed to produce fish not worry about contribution and conservation. It is an industrial model concerned only with production rather than providing a stream of benefits for user groups or protecting native fish sustainability.

LSC-SS2 p. 222: No genetic benefit mentioned for issue. I agree with this assessment pointing out that politics rather than conservation and recovery as the primary driver for Big Sheep Creek.

LSRCP was set up as a mitigation plan based on an industrial production model. It is concerned about production quotas and return. A major departure from the industrial

model is the evaluation of return on the investment. The LSRCP is not concerned with contribution to fisheries or with conservation of wild, native fish populations. If it were, the initial spring chinook mitigation program would have been designed to maintain the productivity of the Grand Ronde salmon. Instead, the primary program focus was using non-native hatchery stock to meet production goals. It was not until the Grand Ronde spring chinook were listed as a threatened species under the ESA that attention was paid to conservation of the genetic diversity in the basin and using locally adapted fish for the hatchery program. The same approach was taken for steelhead with hatchery stock taken from Lower Granite Dam fishways rather than from the rivers of origin. Accountability for the use of public funds would determine the actual contribution to the public fisheries and the cost to provide a fish that is harvested.

Broodstock choice and collection: This section is blank. A description of this problem, if any, should be stated and it should be noted whether the reviewers agree or have recommended changes. This would be better than leaving it blank.

LSC-SS3: It is noted that more hatchery origin fish than wild origin fish are naturally spawning in Little Sheep Creek, but this is excused because there is a study evaluating the reproductive success of hatchery and natural-origin fish. This study has been going on for years and there is presently enough information on this question generated since 1978 on the Deschutes, Kalama and Hood River to conclude that the reproductive success of wild steelhead is negatively affected by hatchery origin fish. Consequently, using research as a way to justify continuing to damage the fitness and reproductive success of wild (ESA-listed) steelhead is no longer acceptable. In addition, the excessive number of hatchery-origin steelhead in the natural spawning population is in violation of the ODFW wild fish policy and the Native Fish Conservation policy. Both these policies are administrative law and therefore this program is illegal. The weir on this stream should be used to exclude hatchery fish from the natural production area above it and adult hatchery steelhead should not be outplanted into the stream above this weir.

The recommendation to equalize the hatchery and wild spawner numbers above the weir on Little Sheep Creek using the HSRG protocol is inappropriate for it increases the risk to an ESA-listed wild steelhead population. The native brood stock integrated hatchery technology is a hypothesis that has not been tested (RIST 2009) and should not be used on a threatened population. By definition a threatened wild population is not abundant enough to be mined for eggs in the hatchery program and allowing interbreeding between hatchery and wild fish is also inappropriate since we know that it has a negative effect on the wild population. In addition, we know there are negative ecological effects created by naturally rearing hatchery-origin fish. Consequently, the recommendation in this section is biologically incompetent, it ignores the best scientific information already available, and contributes to the decline rather than to the recovery of a ESA-listed steelhead population. So quit it.

LSC-SS11: While the Native Fish Society agrees with the research and monitoring recommended in this review, we find it totally irresponsible to not include a cost to catch evaluation of this hatchery program. This means that appropriate data is collected on the cost to produce these hatchery fish and an accurate catch assessment of these hatchery fish is conducted. These programs are supported by public funds and it goes to accountability to have an accurate assessment of the cost to produce a fish that is harvested from this hatchery program. The reviewers should be supporting

accountability of these publicly funded hatchery programs by recommending a cost to catch analysis for each hatchery program.

Preferred and Recommended Alternative:

Given the legitimate concerns about the shortfall in the present evaluation, the Native Fish Society does not agree with the recommendation. We believe that based on the issues identified in our review, that ESA-listed wild steelhead are not adequately protected and this recommendation impedes recovery of these steelhead rather than advances it.