



Native Fish Society

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Conserving biological diversity of native fish and protecting their habitats

August 26, 2009

RE: Comments on NMFS draft Guidance for Monitoring Recovery of Pacific Northwest Salmon and Steelhead

8.0 HARVEST THREATS

From my review of the harvest threats I am pleased with the breadth and detail in the monitoring plan. It is important to view harvest as having a conservation management purpose such as ensuring that harvest does not impact adult abundance and phenotypic characteristics of naturally reproducing wild salmonids required to maintain healthy, viable populations. This means that harvest must be selective and accountable.

Compliance monitoring recommendations are needed to make sure that harvest is supporting rather than impeding recovery. Recommendations on enforcement are needed for it is the key factor for achieving full implementation of the harvest recommendations. In section 10 recommendations are made regarding compliance and enforcement of habitat rules. This approach should be taken in the harvest section, for harvest affects viability of ESA-listed population as much as habitat conditions do. In fact, the lack of spawners in good habitat can impede recovery of an ESA-listed species just as poor habitat can reduce the viability of healthy populations.

There is no discussion about consequences of non-compliance. When a harvest is not in compliance with the recommendations will it be terminated and will closure of the fishery be timely enough to mitigate the damage being done to the ESA-listed populations affected?

Nutrient enrichment of natal streams from spawner carcasses is an important attribute of naturally spawning wild ESA-listed salmonids. Nutrient enrichment targets should be established for each natal stream so that productivity of the stream for natural production of wild ESA-salmonids can be increased. Harvest has an impact on nutrient enrichment of streams and recommendations should be made to ensure that harvest delivers the nutrient targets by stream.

We have all experienced great plans, but are often disappointed in their implementation because of political interference, lack of enforcement, and the lack of funding to evaluate and correct problems including enforcement. This monitoring plan may suffer the same fate of so many other well-intended plans. So the implementation status of this monitoring plan for all threats to ESA-listed salmonids identified in it should be provided for public review every five years.

11.0 MONITORING THREATS DUE TO HATCHERY PRODUCTION:

The hatchery monitoring plan should be expanded to include recommendations for (1) hatchery fish that stray into non-natal streams (2) hatchery fish impact on other salmonid species. For example, the impact that hatchery steelhead and coho smolts have on ESA-listed chum salmon juveniles in the mainstem Columbia River, estuary and near shore ocean environment.

The monitoring plan is based on the HSRG model that anticipates some fraction of hatchery origin fish spawning with wild ESA-listed fish. The recent research completed on Hood River by Araki and Blouin suggest that zero hatchery spawners is the appropriate target. The HSRG framers intended that integrated hatchery technology is used as a safeguard to protect the reproductive fitness and success of wild spawners not a target or goal for how many naturally spawning hatchery fish can be allowed. The integrated hatchery would operate so that in case some hatchery fish escaped into the natural spawning habitat that they would do less damage than fish from standard production (segregated) hatcheries. The premise of the monitoring program would continue to place wild ESA-listed populations at risk. The monitoring plan should be constructed to prevent hatchery fish from spawning naturally so that ecological, genetic and phenotypic impact to wild ESA-listed fish is prevented. This includes the naturally spawning hatchery fish below the hatchery weir or barrier.

Hatchery certification is required. Develop a hatchery certification process based upon compliance with recommendations and established regulations. Make clear regulations for hatchery compliance. For those that do not meet certification standards a process should be provided so it can become re-certified. For hatcheries that cannot meet the standards for compliance and certification there should be consequences that could include fines, loss of funding, closure, and public notice of non-compliance and the reason for it.

Recommendations regulating ecological impacts of hatchery fish on wild ESA-listed salmonids in the natal stream are needed. These would also include the mainstem Columbia River, estuary and near-shore ocean environment.

The monitoring plan places emphasis on changes in genetic characteristics of wild ESA-listed fish due to hatchery fish impacts. While this is important, recommendations are needed to quantify life history and phenotypic changes in a wild population affected by a hatchery program. Phenotypic changes are probably the first level impact on wild populations that when they become fixed result in genetic changes. Genetic changes may not be detectable even though the fitness and reproductive success of the wild population has been altered by hatchery fish impacts on phenotypic and life history attributes of the wild population.

The monitoring plan on threats to wild ESA-listed salmonids is an important contribution to improving conservation management and recovery for at risk wild salmonid populations. Federal regulations to control these threats are welcome and necessary, but enforcement is also necessary to make it work. The Native Fish Society greatly appreciates the thought and clarity in these monitoring recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill M. Bakke", with a horizontal line extending to the right.

Bill M. Bakke, Executive Director