

NATIVE FISH SOCIETY

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Memorandum

TO: Federal Caucus
FR: Bill M. Bakke, Director *BMB*
RE: Comments on the All-H Paper

General Comments:

The All-H Conceptual Recovery Plan needs to have a preferred alternative identified for public review. The Native Fish Society is looking for a combination of factors that will lead to recovery of native, wild salmonids in the Columbia Basin. This means a preferred alternative must be consistent with the ESA. The stated purpose of the ESA (Section 2(b)) is to conserve natural populations in their native ecosystems. The purpose of the ESA is to recover native species in their natural environment. From our point of view the most restrictive approaches in the array of alternatives seems to more closely match the purpose of the ESA and species recovery.

Hydroelectric Options:

1 | The Native Fish Society supports option three, the removal of the four lower Snake River dams. We also recommend the lowering of John Day reservoir by 50 feet to improve rearing and spawning habitats in the river that is now flooded.

2 | Given the fact that ESA-listed salmon and steelhead are not replacing themselves in most years, suggests the mortality burden on these fish populations is too high. In years of poor ocean productivity the salmon cannot cope with the mortality imposed upon them in their life cycle, so the only option for recovery and maintaining salmonid health in the Snake Basin is for dam removal. During years of strong ocean productivity, the salmon may be able to cope with the life cycle mortality profile that includes dams, but they will not be strong enough to cope when the ocean productivity cycle moves to a low productivity phase. Based on this relationship between hydro dam related mortality and ecological productivity over the full life cycle of the ESA-listed species, there is no alternative but to remove the four lower Snake River dams and lower John Day reservoir.

With that said, it is our belief that dam removal is but a tool in ESA-salmonid recovery tool kit. Unless all other factors are addressed to improve the health, abundance, and productivity of native salmonid populations, the removal of dams will not result in the recovery of ESA-listed species. Dam removal is not a silver bullet that by itself will fix the salmon problem of declining populations and continuing extinctions.

Harvest Options:

3 | The Native Fish Society supports option number 3, which calls for conservation fishery management.

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As the term "management" implies, harvest management should be tied to biological objectives by species, especially ESA-listed species, that ensure stock structure, abundance, distribution, and adaptive diversity of native, wild populations is accomplished annually. Each native, wild population should have biological goals associated with it which harvest management is required to achieve. If on evaluation, harvest management, by itself, is unable to accomplish these goals, all other factors should be managed to assist distressed populations. A comprehensive recovery program requires that all of the "Hs" contribute in concert to recovery. At this time harvest management impacts on listed species have been reduced in some instances, but the ESA-listed adult salmonids continue to be harvested and that is forgiven by the federal government

In 1995 the NMFS identified 39 populations of spring and summer chinook in the Snake Basin and said that spawner abundance should be from 150 to 300 per population, and to fall below that level constitutes jeopardy. Well, these populations have dropped below this range and some populations have become zeros. Given this situation, the NMFS and the fish agencies have continued to kill ESA-listed salmonids in sport and commercial fisheries. This continued killing of adults needed to recover ESA-listed species is contributing to the decline and extinction of listed species. Even though the decline in Snake River populations has triggered a jeopardy response by NMFS, the agency remains silent.

Harvest management must be moved into conservation framework where it is expected to accomplish biological standards by population. Until this takes place as a function of federal sanctioned harvest management, there can be no recovery of listed species, even if the dams are removed.

Hatchery Options:

The Native Fish Society supports option three that calls for an increase in conservation programs and a decrease in mitigation programs.

The Columbia River hatchery program, especially those hatcheries operated or funded by the federal government, should be moved into a conservation framework for recovery of native, wild salmonids listed under the ESA.

While making this recommendation, we believe the scientific literature is sufficiently full of caution regarding the use of hatcheries for rebuilding wild populations, that specific standards for such hatchery operations are required. According to the ESA (Section 2b) artificial propagation of listed species is to be used only when other, less intrusive recovery methods have failed, are likely to fail, or are shown to be ineffective in overcoming extant limiting factors. (USFWS/NMFS 1996). The ESA requires that native species in their habitat be recovered so that they are self-sustaining. Populations dependent upon hatchery production are not self-sustaining and in most cases, populations that have increased under hatchery supplementation have declined to pre-supplementation levels once the hatchery option is turned off.

In addition to spelling out specific biological standards for hatchery operations, the federal agencies should also develop a representative list of reference populations of wild, native salmonids in the basin to act as controls to the hatchery experiment.

We also recommend the federal agencies adopt a native, wild fish conservation framework and strategy with biological goals. Even though billions have been spent on salmonid recovery in the Columbia Basin, there is still no native fish conservation strategy for the basin. There is no technical working group with the specific responsibility of native fish conservation. Lacking a native fish conservation framework and objectives, the federal agencies cannot recover the ESA-listed species nor can they put a plug in the ESA pipeline.

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Habitat Options:

The Native Fish Society supports option 3 which would increase the federal role under the Endangered Species Act and the Clean Water Act.

Voluntary programs such as those proposed by Oregon under the Oregon Plan for Salmon and Watersheds are a failure because it is voluntary. It is helpful for local jurisdictions to develop actions to recover native salmon populations, but they are greatly encouraged to do so if there is a federal enforcement presence. Initially, there was great interest on the part of local jurisdictions in doing the right thing for salmon as long as they believed in a federal response if they did not do their job. But now these same local jurisdictions are relaxing as they realize NMFS or other federal agencies are not very interested in enforcement. Will Stelle recently recommended that the NGO's enforce the federal regulations rather than his own agency, NMFS.

If the federal government is going to embrace local solutions to salmon habitat problems, then there should be a means to evaluate those solutions, to determine whether they are having a cumulative benefit for salmon across jurisdictions, and the enforcement capacity to bring about compliance. Compliance monitoring would be a helpful function to be included in a habitat option.

We recommend that the federal government shift monies away from local projects to one of funding enforcement monitoring. By funding the Oregon State Police (and their counter-parts in other states and the tribes) to enforce existing regulations protecting habitat, the federal dollars will be spent with more meaning and benefit. If the enforcement program identifies problems that need funding to correct, then the agency, jurisdiction, or affected public could apply for a federal grant to solve the problem. This would place federal funding into a category where it not only supports environmental protection but targets funds toward problems that have been identified.

Conclusion:

I would like to reiterate that an integrated approach to salmon recovery involving all of the factors limiting salmonid productivity should be taken. We have become diverted in the belief that removing dams is all that we need to do to save salmon. The salmon problem is complex and it requires a comprehensive approach based on biological standards and compliance monitoring and evaluation of results.