

March 17, 2000

Federal Caucus
c/o BPA - PL
707 W. Main Street, Suite 500
Spokane, Wa 99201

RE - Comments on draft All H Paper

Dear Federal Caucus member:

On behalf of the members of the Columbia River Alliance for Fish, Commerce and Communities, we appreciate the opportunity to provide comments on the December 1999 Draft Conservation of Columbia Basin Fish. While we believe there are serious omissions and biases in the draft document, it is our desire for the federal agencies to continue this process and implement a comprehensive salmon recovery plan.

CRA represents interests from throughout the four northwest states and Canada. Our membership includes river dependent communities, navigation, electric utility, industries, agriculture, labor and forestry industries. We have been involved in salmon recovery for the last eight years, actively reviewing and participating in recovery of threatened and endangered Columbia Basin salmon stocks.

CRA's comments will include a description of nine study errors and omissions, a recommended fourth alternative and future steps.

Nine Key Errors and Omissions

We support federal efforts to examine all areas of salmon decline. Study after study has suggested that successful salmon recovery will require development and adoption of a comprehensive approach which examines all life stages for salmon. While it is disappointing this effort has taken almost ten years, we are now encouraged with this recent federal agency effort.

Comment 1 - Draft plan lacks goal. The draft plan does not describe one consistent goal. Here are some examples:

"The goal of this paper is to stimulate discussion of what the region can do to recover salmon and steelhead and other aquatic species" Page 2, Column 1.

"Conserve species, conserve ecosystems, assure tribal fishing rights, balance the needs of other species, and minimize adverse effects on humans" Page 2, Column 2.

"The purpose of this paper is to outline the fundamental choices that face the region is salmon recovery is to succeed." Page 11.

"Avoid extinction and foster long-term survival and recovery of Columbia Basin salmon, steelhead, listed resident fish, and other aquatic species" Page 23

"Foster recovery to levels that can withstand reasonable harvest" Page 23

"To provide a scientific framework for salmon and steelhead conservation" Page 23

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cont. Over the last ten years, salmon recovery planning has been thwarted due to lack of a consistent, understood goal. As illustrated above, each of these goals from the draft federal plan can lead to several different recovery plans, create public confusion, economic inefficiency, miscommunication, and, ultimately lead to lack of progress for salmon recovery.

CRA recommendation - We recommend that recovery efforts focus solely on threatened and endangered salmon and steelhead with a goal of preventing extinction and improving species status to a level when de-listing can occur. In addition, we recommend the federal authors revise the draft to become consistent with one goal and re-release for public comment or conduct a subsequent public involvement process to develop a regional consensus position.

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Comment 2 - Flawed public involvement process - The recently completed All H public hearings should serve as an example of how federal public involvement should not be conducted. Saving endangered salmon is, at its roots, a scientific issue and, without adequate information, how can the public provide thoughtful and informed recommendations? They can't. The recent public process was a popularity contest (for or against dam breaching) and a NIMBY (not in my back yard), that provided little constructive input.

CRA Recommendation - Revise the draft document based on a consistent goal, new scientific findings and studies and public comments. Create a public involvement process that provides information and promotes substantive, thoughtful and constructive comments. We believe you can do it and commit our resources to assist you in developing and implementing a constructive process.

Comment 3 - Study authors exhibit bias against hydropower dams and river operations - While we support the inclusion of hatchery and harvest sections, the draft report displays an obvious and unwarranted bias against dams.

Comments from page 2 are prevalent and illustrative of this bias:

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"The people of the Pacific Northwest have made efforts to turn around the salmon and steelhead decline. Fish managers in the basin have dramatically reduced harvest. They have also made substantial progress to address hatchery practices and established programs to improve habitat. Although there have been many improvements at dams and in hydropower operations, the major hydropower dams on the Snake and Columbia rivers continue to be a significant source of mortality for some stocks of migrating fish."

During the last ten years, salmon survival through the 320 miles of the lower Snake and Columbia rivers (from Lower Granite to Bonneville Dam) has been the most studied aspect of salmon mortality in the Columbia River Basin and quite possibly of any species in the history of the Endangered Species Act. Tens of millions of dollars have been spent to measure survival through these eight dams and reservoirs. Recent Pit-Tag data found that inriver migrating juvenile salmon survival rate exceeds 50 percent and transported salmon survive at rates exceeding 98 percent. Combined system survival for juvenile salmon now exceed 70 percent, and while the remaining mortality results from both human caused and nature, the facts do not support the conclusion that these dams "continue to be a significant source of mortality". We believe the

30 percent harvest rate on endangered Snake River Fall Chinook in 1999 is a “significant source of mortality”, however, the authors instead provide accolades to fishery managers.

Perpetuating myths concerning hydropower reduces the credibility of the draft document, lacks scientific basis and is contrary to the All H approach.

CRA Recommendation - Modify the draft to eliminate biased and scientifically unsubstantiated comments against hydropower dams and operations.

Comment 4 - Study omits role of 100 years of fishery agency management in salmon decline- A serious omission in the draft document is how past and present fishery management practices have reduced overall salmon population levels, the strength of the gene pool, the resiliency of the species, allowed unchecked predation to continue and population over harvest by fishery managers. The draft paper dismisses past fishery management actions and their impact on future species rebuilding. For 100 years, salmon were managed for maximum commercial and sport harvest with little consideration for native stock conservation. Not until after ESA protection, native salmon species have become a greater priority, yet, it is unknown whether the remaining native stock gene pool can recover due to past fishery agency policies and programs. For example, the 70 year practice of commercial fishing with gill nets selectively catches larger salmon, leaving the gene pool to be promulgated with smaller fish that may not have the energy reserves to successfully migrate 900 miles to historic spawning areas.

The draft report simply concludes that “fish managers have dramatically reduced harvest” or “fish managers have made substantial progress to address hatchery practices.” While this statement maybe true, we believe 100 years of managing for one objective (more fish for commercial and sport harvest) may have significant effects on future recovery efforts.

CRA Recommendation - Include a discussion of research that examines fishery management impacts on past, present and future efforts to rebuild native stocks.

Comment 5 - Federal Agency statutory authorities must guide recovery efforts - For the nine federal agencies, the only legal mandates described as constraints in the draft report are the Endangered Species Act and Tribal Treaty obligations. The United States Congress have placed a broad array of obligations on all nine federal agencies that govern their activities for fish and wildlife and other actions which effect citizens of the pacific northwest. It is inconsistent for this draft plan to conclude that meeting the requirements of the Endangered Species Act is mandatory while the other governing laws can simply be changed by Congress.

CRA Recommendation - The report should limit alternatives to those which can be implemented consistent with present statutory authorities.

Comment 6 - Ocean and climatic effects should receive greater consideration - While there is scientific evidence that the ocean environment is a dominate factor in the decline of all west coast salmon and steelhead species, the report does little to examine this effect and propose future management actions.

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cont. **CRA Recommendation** - Describe ocean climatic and productivity shifts that have impacted anadromous species and present future management operations and constraints given alternative ocean conditions.

Comment 7 - Predator population reduction must be included in recovery actions - The draft report is void of actions to reduce salmon predation, which according to scientific results, is one of the major areas of mortality. While the alternatives considered in the draft report would create family hardships, job loss and destroy rural communities, it is inconceivable that federal agencies would not consider reductions of marine mammals, Caspian Terns, Cormorants and other predators as an important recovery plan action. The two examples of significant predation are the population of Columbia River Caspian Terns which are consuming almost 20 million juvenile salmon and the 20 to 30 percent of adult salmon returning to Lower Granite Dam exhibiting marine mammal bites.

7 **CRA Recommendation** - Expand the All H Recovery Plan to include actions to reduce predation.

Comment 8 - Salmon recovery management must be improved - In 1994, the Bevan Recovery Team expressed concern for the overlapping jurisdictions and responsibilities of numerous federal, state and tribal organizations managing our salmon resource. CRA concurs and have witnessed agencies working at cross purposes with each other, expending resources in an inefficient manner. While it is encouraging for the nine federal agencies to develop jointly this draft conceptual recovery plan, it is far short of the coordination needed for salmon recovery. Management must be streamlined.

CRA Recommendation - Include a discussion on alternative management structures which would result in a more efficient method for implementing salmon recovery actions.

8 **Comment 9 - Maximize transportation option omitted** - The December 1999 BPA, BOR, Corps Biological Assessment (Page 2-10) said "Minimizing in-river passage and maximizing transport, at the PATH and White Paper survival rates, results in a over 90 percent system survival that can be realized with the existing system." However, this alternative is not described in the hydropower alternatives. This oversight should be corrected.

CRA Recommendation - Add a new alternative (#4) which maximizes juvenile salmon and steelhead transportation.

A New Alternative Should be Considered

9 We believe the following plan should be included in the All H proposals. These elements can be implemented immediately, are within existing agency statutory authorities, have solid scientific support, and provide maximum salmon enhancement benefits.

Goal - Rebuild threatened and endangered salmon and steelhead populations in the

Columbia Basin.

Management - Centralize hydropower, hatcheries, harvest, and predation salmon recovery actions with the National Marine Fisheries Service. Coordinate Basin habitat plans through the Northwest Power Planning Council and decentralize actions to local watershed councils and landowner groups.

Hydropower - Eliminate spring and summer flow augmentation program, eliminate voluntary spill and maximize smolt collection and transport program. Continue progress at dams to improve passage survival and collection.

Habitat - Provide technical and financial assistance to landowners and managers to improve riparian conditions in Columbia Basin tributaries.

Harvest - Eliminate mixed stock harvest in Columbia River until mass marking and selective fishing techniques can be implemented.

Hatcheries - Mark all hatchery salmon, improve genetic strength of brood stock through supplementation practices, and explore conversion of Mitchell Act Hatcheries to modern facilities.

Predation - Eliminate populations of marine mammals, Caspian Terns, and other predators in the Columbia river system.

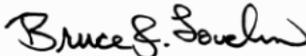
Ocean and Climate - Conduct research to better understand biological limits and constraints within the ocean. Implement measures as needed to mitigate for downturn in ocean productivity.

Future Steps

CRA members are encouraged with the federal agency desire to prepare and implement an "All H" approach to salmon recovery. The nine comment areas and new alternative are presented to strengthen the federal plan and ultimately lead to a plan CRA members and other regional stakeholders can support. We are committed to assist your agencies in this effort and will provide additional comments and recommendations as needed.

Again, thank you for the opportunity to comment on the draft All H paper.

Sincerely,



Bruce J. Lovelin
Executive Director

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