

## Klamath Fishery Management Council

*Working to Restore Anadromous Fish in the Klamath River Basin*  
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MAR 17 2006

California Commercial  
Salmon Fishing Industry

California Department  
of Fish and Game

California Offshore Sport Fishery

Hoopa Valley Tribe

Klamath In-River Sport Fishery

National Marine Fisheries Service

Non-Hoopa Indians Representative

Oregon Commercial  
Salmon Fishing Industry

Oregon Department  
of Fish and Wildlife

Pacific Fishery Management  
Council

U.S. Department of the Interior

Don Hansen, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, Oregon 97220-1384

REC'D

MAR 22 2006

PFMC

Subject: Marking Rates at Iron Gate Hatchery

Dear Mr. Hansen:

The Klamath Fishery Management Council (KFMC) wishes to draw your attention to an extremely important issue in the management of Klamath River fall Chinook salmon: the low marking rates of Klamath River fall Chinook at Iron Gate Hatchery. The KFMC requests your assistance in informing the Federal Energy Regulatory Commission (FERC) on the importance of constant fractional marking of Klamath River fall Chinook at Iron Gate Hatchery, which is funded by PacifiCorp as a condition of its license to operate its hydropower facilities in the Klamath River of Oregon and California.

PacifiCorp is in the process of renewing its FERC license (FERC 2082). The existing license expired on March 6, 2006. It may be several years before a new long term license is issued. In the meantime, it is expected that PacifiCorp will be operating under a series of annual licenses based upon the terms of the previous license. It is not uncommon for FERC to issue multiple annual licenses, occasionally taking over a decade to implement new license conditions.

Contemporary practices at large-scale salmon production hatcheries, such as Iron Gate Hatchery, require proper accounting for contribution to fisheries, facility efficiency, review of release strategies, and minimizing effects on naturally produced fish.

As you know, the KFMC and its Technical Advisory Team (Team) are responsible for assessing the annual spawning abundance and ocean and river harvests of Klamath River fall Chinook. Among the most critical elements of the assessment is the recovery of coded wire tags (CWT) from fish marked and released from Iron Gate and Trinity River Hatcheries. The CWT recoveries provide information on the distribution, timing, and relative magnitude of catches

of Klamath River fall Chinook off Washington, Oregon, and California, in the recreational and tribal fisheries in the Klamath Basin, as well as the magnitude of the returns to hatcheries and natural spawning areas.

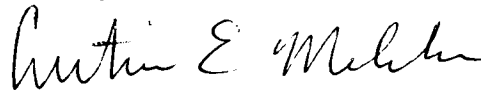
Stock analysis using CWT information is critical in managing Pacific salmon populations. The Pacific Fishery Management Council and National Marine Fisheries Service use this information in developing annual salmon fishing regulations for the west coast. Their ability to manage fisheries is strongly influenced by the marking rates of fish released from Iron Gate and Trinity River Hatcheries. Since 2000, the marking rates of Trinity River Hatchery fingerlings have been a constant fractional 25% of production. In contrast, marking rates of Chinook fingerlings at Iron Gate Hatchery have been about 4% of the production. Due to the low marking rates, Iron Gate CWT fish are not frequently recovered. When they are recovered, a very high expansion factor is assigned to them, which reduces the accuracy of harvest rate predictions for a given time and area.

Under the interim annual license, FERC has the option to require PacifiCorp to increase the marking rate now. During the traditional re-licensing process, many state and federal agencies, tribes and non-governmental organizations have requested FERC to direct PacifiCorp to increase the marking rate of Iron Gate Hatchery fall Chinook. To date, FERC has not responded to these requests.

The KFMC respectfully requests that the Pacific Fishery Management Council inform FERC of the need to increase the marking rate of Klamath River fall Chinook at Iron Gate Hatchery. The improved marking rate should be applied for the entire duration of the interim licenses. When a new license is issued, the appropriate marking rates should be included in any hatchery management regime.

Thank you for your consideration of this issue. If you have questions, please contact Phil Detrich, Yreka Fish and Wildlife Office, at (530) 842-5763.

Sincerely,

A handwritten signature in black ink, appearing to read "Curt E. Melcher". The signature is written in a cursive, flowing style.

Curt Melcher, Chairman  
Klamath Fishery Management Council