



UNITED STATES DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

NATIONAL MARINE FISHERIES SERVICE

West Coast Region

1201 NE Lloyd Boulevard, Suite 1100

Portland, Oregon 97232-1274

December 21, 2016

RECEIVED

Herb Pollard, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear ^{Herb}Chair Pollard:

PFMC

As you know, NOAA's National Marine Fisheries Service (NMFS) is reviewing its distribution of Mitchell Act hatchery funds under both the National Environmental Policy Act (NEPA) and the Endangered Species Act (ESA). As a result of these reviews, NMFS and the hatchery operators are proposing changes to several of the hatchery programs in the Lower Columbia River to minimize impacts to ESA-listed salmon and steelhead. We realize that fishing communities are interested in understanding the effects of these proposed changes on fisheries and we seek the Pacific Fisheries Management Council's (Council's) assistance in refining our analysis of fishery effects and engaging affected stakeholders in a dialog about these proposed changes and the future of the Mitchell Act program.

The Mitchell Act program is one of our most important means of mitigating for development activities that reduced the capacity of the Columbia River to produce salmon and steelhead. More than 40 percent of the catch of salmon and steelhead in the Columbia River and more than 20 percent of the catch of Chinook and coho salmon along the Washington and Oregon coasts are attributable to production supported by Mitchell Act funding. Tribal and non-tribal fishers from the Columbia River to southeast Alaska depend on Mitchell Act hatchery production to sustain their fisheries.

The Mitchell Act program has evolved over time to meet the needs of stakeholders and the environment. NMFS completed an Environmental Impact Statement (EIS) on the Mitchell Act program in 2014 after a great deal of public engagement. The EIS included a preferred policy direction that prioritizes funding for hatchery programs that include stronger performance goals to minimize the risks of hatchery programs to ESA-listed natural-origin salmon and steelhead.

NMFS first completed ESA consultation on the Mitchell Act program in 1999. Since that time, and through subsequent biological opinions, we have outlined, and the operators have carried out, reforms including: improved monitoring of the status of salmon and steelhead populations; changes in the use of local broodstock; changes in production levels; use of weirs to selectively remove hatchery fish from the spawning grounds; and use of alternative release locations. These measures have helped reduce straying of hatchery fish onto spawning grounds in some locations, and we expect from monitoring that this is benefiting wild populations.



However, we have also realized through continued monitoring that we have more to do. There is still high genetic risk because too many hatchery fish are spawning naturally. There is also ecological risk because juvenile hatchery fish compete with juvenile natural origin fish for food and the same limited rearing habitat. These factors can result in lower abundance, productivity, diversity, and distribution of natural-origin fish than would otherwise occur.

The changes to hatchery programs outlined below are designed to further reduce risks to the ESA listed stocks in the Lower Columbia River, but to do so in a way that minimizes negative effects to tribal, commercial, and recreational fisheries. These actions have been informed by new scientific information that has been collected during the last six years and build on reform measures that the hatchery operators have been implementing over the past 5 to 10 years.

The proposed changes include:

- Modifications to hatchery broodstock
- Changes in location of some hatchery releases
- Installation of weirs in some rivers
- Changes in the number of hatchery fish produced and released

To reduce genetic risks to ESA-listed Lower Columbia River Chinook salmon, NMFS is proposing to reduce tule fall Chinook salmon production in four Mitchell Act funded hatchery programs and to increase tule fall Chinook salmon production in two hatchery programs. This would result in a 4 million net reduction in the number of juvenile tule fall Chinook salmon that would be released from Mitchell Act hatcheries annually. The installation and operation of new weirs in tributary streams will be critical to the success of the overall program and minimizes the need for further production cuts. These proposed changes would be implemented over a five-year transition period, likely beginning with broodyear 2017 and ending with broodyear 2021.

NMFS' preliminary assessment of fishery effects suggests that these proposed production changes would result in a four to seven percent reduction in catch in the following fisheries: North of Falcon non-Treaty troll and sport fisheries, Treaty troll fishery, and the central Oregon coast troll fishery. The effects of these changes would not be felt in fisheries until between 2021 and 2025 because it would likely take up to four years for production changes to be reflected in ocean abundance, given the age structure and maturation rates of tule Chinook salmon.

NMFS is proposing reductions in coho salmon production in five Mitchell Act hatchery programs to reduce straying and resulting genetic effects. However, to offset the impacts of these reductions to fisheries, we propose increases in coho salmon production in one existing Mitchell Act hatchery program, and the initiation of two new Mitchell Act coho salmon hatchery programs. These changes would result in an approximate net increase of 290,000 juveniles that would be produced and released from Mitchell Act funded hatchery programs. NMFS' preliminary assessment of fishery effects suggests that these proposed production changes would result in a two to five percent increase in catch in the following fisheries: South of Falcon, North of Falcon Treaty troll, North of Falcon non-Treaty troll, North of Falcon sport fisheries (Areas 1-4).

NMFS will complete a biological opinion on the proposed changes on or before January 15, 2017. This biological opinion will assess the proposed program in terms of compliance with the ESA, and may recommend further changes. Nothing stated here is meant to prejudice the outcome of that analysis.

Following issuance of the biological opinion, we will work with hatchery managers, Indian Tribes, the Council, stakeholder groups and others to implement important aspects of the strategy including the development of an adaptive management framework and the identification of priorities and strategies for future monitoring, evaluation, and reform. In implementing the biological opinion, we are committed to exploring options under the Mitchell Act to mitigate impacts on the most affected fisheries, consistent with the survival and recovery of ESA-listed salmon and steelhead.

We welcome ideas and input on the implementation of this hatchery strategy and how hatchery production in the lower Columbia River could be restructured to better serve both fisheries and ESA recovery.

If you have any questions, please feel free to reach out to Rob Jones, Branch Chief for Anadromous Production and Inland Fisheries, at (503) 230-5427, or Peter Dygert, Branch Chief for Anadromous Harvest, at (206) 526-6734.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry A. Thom". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Barry A. Thom
Regional Administrator