



Pacific Fishery Management Council

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Dan Wolford, Chairman | Donald O. McIsaac, Executive Director

June X, 2013

Tony Grover
Director Fish and Wildlife Division
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204

Dear Mr. Grover,

Please accept the comments below from the Pacific Fishery Management Council (PFMC) as recommendations for the Northwest Power and Conservation Council (NPCC) Fish and Wildlife Program amendment process.

As you may know, the PFMC is one of eight Regional Fishery Management Councils established by the Magnuson-Stevens Fishery Conservation and Management Act (MSA) of 1976, and recommends management actions for Federal fisheries off Washington, Oregon, and California. The MSA includes provisions to identify, conserve, and enhance essential fish habitat (EFH) for species regulated under a PFMC fishery management plan. Each Regional Fishery Management Council is authorized under MSA to comment on any Federal or state activity that may affect the habitat, including EFH, of a fishery resource under its authority. Furthermore, for activities that the Council believes are likely to substantially affect the habitat of an anadromous fishery resource under its authority, the Council is obligated to provide comments and recommendations (MSA §305(b)(3)).

NPCC Role in Funding

The Bonneville Power Administration (BPA) entered into nine Columbia Basin Fish Accords that are intended to supplement the Federal Columbia River Power System BiOp and the NPCC Fish and Wildlife Program. Parties to these agreements work in partnership to carry out measures intended to improve survival benefits for salmon recovery. Although these agreements commit BPA to provide funding for measures contained [in the Accords?], those commitments do not negate BPA's responsibility to ensure they are scientifically and technically sound and that they address regional priorities. Nor do these agreements relieve the NPCC from its responsibility to facilitate regional review and discussion of these measures involving all fish and wildlife managers in the basin and interested stakeholders. Regional review and discussion of existing

and proposed measures have long been a key component of the NPCC's process for amending and implementing the NPCC Fish and Wildlife Program.

Recommendation: We recommend that the NPCC work with all regional fish and wildlife managers to ensure that an amended Fish and Wildlife Program clearly describes regional goals, objectives and priorities for the protection, mitigation and enhancement of fish and wildlife in the Columbia Basin. These priorities should be sufficiently detailed to guide BPA's funding decisions and should include a comprehensive program to monitor and evaluate outcomes of Program measures.

NPCC Role in Regional Coordination

The fish and wildlife management "landscape" in the Columbia Basin has changed significantly in recent years. Some changes have created opportunities for fish and wildlife managers to work together in new or expanded regional and sub-regional forums that focus attention and efforts on critical species in critical areas. However, there remains the need for the NPCC to regularly work with fish and wildlife managers individually and collectively when amending and implementing the Fish and Wildlife Program.

Recommendation: We recommend that the NPCC create a mechanism to receive key input from states, tribes and other partners on an annual basis. An annual forum would help assure that prioritized discussions are maintained and that all partners are engaged in NPCC planning and prioritization processes.

Quantitative Performance Goals

The current Fish and Wildlife Program has a basin-wide quantitative performance goal of increasing total adult salmon and steelhead runs to an average of five million annually by 2025. However, the five million fish goal lacks specific population objectives. Quantitative performance goals and restoration strategies for individual spawning populations are essential to evaluate the success of the Fish and Wildlife Program and to implement adaptive management strategies. Expanding the quantitative performance goals to include hatchery and wild population objectives would help assure consistency with the Hatchery Scientific Review Group (HSRG) requirements that hatchery programs must have quantifiable performance goals, such as the abundance of fish harvested and the abundance of spawning fish. Further, the co-managers in consultation with BPA, the NPCC, and NOAA have developed monitoring programs and a data exchange standard for reporting comparable metrics and indicators to assess biological performance of NOAA's recovery goals through the Coordinated Assessments project.

Recommendation: We recommend the NPCC maintain existing Basin-Level Biological Objectives that set a goal of five million adult fish returning annually to the Columbia River. As called for in the current Program, the NPCC should proceed with a process to assess the value of quantitative biological objectives and to develop an updated and scientifically rigorous set of such quantitative objectives. We recommend the NPCC adopt the NOAA recovery goals for salmon and steelhead listed under the Endangered Species Act (ESA) as interim quantitative

performance benchmarks for these populations, and fund data management strategies described in the Coordinated Assessments framework to report on population performance relative to these goals. Over the next five years, we recommend the NPCC work with co-managers and the public to develop quantitative healthy and harvestable performance goals for all affected fish, along with quantitative restoration and hatchery mitigation performance goals.

Test the Efficacy of Higher Spill Levels to Increase Smolt-to-Adult Return Rates

Achieving the Northwest Power and Conservation Council's targeted smolt-to-adult return rate goal of 2-6% (average 4%) is projected to more than double adult returns of Snake River salmon to the mouth of the Columbia River, and would benefit other PFMC-managed stocks that originate in the Columbia Basin. The PFMC's Habitat Committee was briefed on the most recent findings from the BPA-funded annual Comparative Survival Study as it relates to spill issues. The data accumulated since the Comparative Survival Study was initiated in 1996 suggests that increased spill levels could raise smolt-to-adult return rates to the NPPC target levels for recovery without major reconfiguration of the hydrosystem projects (i.e., dam breaching). This information is promising. The Habitat Committee's report on the briefing is available at <http://tinyurl.com/bsax8jr>.

Recommendation: We recommend the NPCC maintain existing Basin-Level Biological Objectives that set a smolt-to-adult return rate goal of 2-6% (average 4%). As called for in the current Program, the NPCC should proceed with a process to assess the value of quantitative biological objectives and to develop an updated and scientifically rigorous set of such quantitative objectives. The NPPC should also recommend a study of higher spill levels to test the efficacy of spill in increasing adult returns to the Columbia Basin. Quantitative Performance Goals set by NPCC for smolt-to-adult return rates should also be emphasized, and performance assessed annually.

Artificial Production of Salmon

Since the inception of hydropower facilities in the Northwest, hatchery programs have been advocated and implemented as mitigation for the impacts of dams on lost spawning and rearing habitat. As long as the dams remain in place, the mitigation commitments for lost habitat also remain. The challenge is to adaptively manage hatchery programs based on the best available information to address ESA compliance issues and support recovery plan implementation while also meeting ongoing mitigation obligations that are critically important to West Coast sport, commercial, and tribal fisheries. The current Fish and Wildlife Program recognizes that these artificial production strategies "must be implemented within an experimental, adaptive-management design that includes an aggressive program to evaluate the risks and benefits and addresses scientific uncertainties." The Program should also recognize the need for monitoring to assess progress in achieving mitigation goals and hatchery performance. Because biological uncertainties remain and salmon productivity benefits are potentially high, adequate funding to support adaptive management should remain a priority.

Recommendation: We recommend the Program supports hatchery program reviews to ensure compliance with regional mitigation, conservation and recovery goals, using performance indicators and adaptive management measures, and a structured monitoring, evaluation, and research program.

Emerging Habitat Issues

There has been a lack of comprehensive planning regarding the issue of toxics contamination in the Columbia River basin.

Recommendation: We recommend the NPCC support the Independent Scientific Advisory Board (ISAB) recommendation to account for the impacts of toxic contaminants on populations in the basin to ensure a robust toxics program is scoped as an amendment.

Climate Change

The current Fish and Wildlife Program identifies adaptive water management as the primary response to climate change impacts on fish and wildlife resources in the basin. However, providing access to refugia habitats in tributaries may become vital as predicted climate change narrows the availability of existing habitats. For example, increased consideration of salmon re-introduction above currently non-passable obstructions to cool water habitat may become necessary.

Recommendation: The NPCC should expand its leadership role in identifying salmon recovery and mitigation actions to address climate change. We recommend the NPCC convene a working group to begin addressing how predicted change could be addressed in decision making at all levels of the program.

Columbia River Treaty

The Fish and Wildlife Program should address impacts from the Columbia River Treaty. It is currently unclear how the mitigation responsibilities under the 1980 Northwest Power Act are affected by the Treaty, however, impacts to habitat from the Columbia River Treaty need to be mitigated.

Recommendation: We recommend the NPCC consider how the Columbia River Treaty impacts salmon and their habitat and endorse mitigation alternatives by asking U. S. Entity Representatives to place a high priority on options that increase provisions for “ecosystem-based function” consistent with the Fish and Wildlife Program.

Estuary habitat

Council-managed ocean salmon fisheries north of Cape Falcon are highly dependent on salmon production from lower Columbia River populations.

Recommendation: The Council recommends continued endorsement of restoration activities in the Lower Columbia River estuary to accelerate recovery of both up-river runs and lower-river

priority salmon runs. In addition, the estuary and lower river habitat is thought to be important to eulachon smelt, a species listed as threatened under the Endangered Species Act and not an apparent consideration in the 2009 Fish and Wildlife Program.

The Council appreciates the opportunity to comment on the NPCC's Fish and Wildlife Program amendment process. Please feel free to contact us with any questions.

Sincerely,

[Signature block]