



Pacific Fishery Management Council

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Northwest Power and Conservation Council
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May 22, 2014

Dear Chairman Bradbury,

In August 2013, the Pacific Fishery Management Council (PFMC) submitted a set of recommendations as part of the Northwest Power and Conservation Council's (NPCC) Fish and Wildlife Program (Program) amendment process. Overall, the Program reflects many of the recommendations important to PFMC. Provided below are refined recommendations to the Draft Program that we believe will strengthen it and help ensure fish and wildlife impacts are adequately mitigated for in the Columbia Basin.

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 Federal 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 a Fishery Management Council believes are likely to substantially affect the habitat of an anadromous fishery resource under its authority, that Council is obligated to provide comments and recommendations (MSA §305(b)(3)).

Role of the NPCC: The Draft Program has effectively articulated the NPCC's role in funding mitigation, and the inclusion of an investment strategy is forward-thinking. However, there are two areas that have been significantly reduced in the Draft Program: quantitative goals and objectives, and direction regarding monitoring, data management and, in particular, Coordinated Assessments. Without quantitative goals, a comprehensive monitoring framework and clear reporting, it is unclear how the NPCC will apply adaptive management. Although the Draft Program articulates the process by which quantitative objectives will be developed, it relegates existing goals to increase salmon and steelhead runs to an average of five million fish annually; and the targeted smolt-to-adult return rate goal of 2-6 percent (average 4 percent) to an appendix. Until the NPCC revises and adopts alternatives, these two goals should remain upfront in the section titled "Program goals and quantitative objectives."

In addition, the NPCC's section on Regional Coordination does not reflect the changing coordination landscape that has evolved over the last few years. Without a regional coordinating body, the NPCC needs to take a larger role in convening relevant conversations and coordinating

with all fish and wildlife managers. We reiterate our recommendation that the NPCC should create an annual forum to prioritize Basin issues such that all managers can help craft and be responsive to emerging conversations, policy issues and concerns. The Draft Program does not, yet should, provide sufficient detail to guide BPA's funding decisions. Conversations with managers can serve to inform and guide those decisions.

Hatcheries: PFMC previously recommended that the Program support 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.

The NPCC supported a balanced hatchery approach based on mitigation, science, and integration with habitat restoration. It affirmed the use of hatcheries to meet mitigation goals, recommended hatchery effectiveness monitoring, marking all hatchery fish and implementation of Hatchery Scientific Review Group recommendations.

The Draft program is consistent with PMFC recommendation but relies on processes such as the NPCC Research Plan to address critical uncertainties, hatchery review by co-managers 3-5 years, and additional hatchery reporting requirements. The Program should clearly describe how the additional hatchery process recommended by NPCC will be funded. The NPCC should continue to fund, develop, maintain and expand terminal off-channel select area fishing opportunities and mark-selective fisheries designed to harvest sufficient numbers of returning hatchery fish in a fashion so that they do not impact naturally spawning fish.

Test the Efficacy of Higher Spill Levels: The NPCC's continued interest in improving spill and mainstem operations as a tool to improve smolt-to-adult return rates is in keeping with the PFMC's perspective. The NPCC previously outlined necessary next steps including full engagement of NOAA Fisheries and the Basin's fish and wildlife managers' expertise. Providing criteria for review in the Draft Program is a constructive step forward as the Basin continues to understand how to implement a spill experiment.

In addition, PFMC recognizes the important role played by the Fish Passage Center in providing data products and analysis, which is consistent with the Draft Program's recommendations.

Water Quality and Toxics: The NPCC's amendment for toxics is an improvement over the 2009 Program, and strengthens engagement in this issue. We agree with the additional research suggested and the role of the NPCC in helping to bring in funding under EPA's Large Aquatic Ecosystem designation that has been provided to other EPA-designated water bodies (Puget Sound, Chesapeake Bay, Great Lakes, etc.).

Climate Change: The climate change section is strong and specific. However, the amendment lacks a cohesive vision or the development of a plan to guide the actions. We reiterate our recommendation to convene a working group to ensure that efforts are coordinated and effective.

Estuary: The estuary section is well-developed, and we support the recommended focus on habitat restoration and support monitoring the effectiveness of habitat actions. We also support the additional section focused on eulachon, which is identified in the Unmanaged Forage Fish

Protection Initiative of the PFMC's Fishery Ecosystem Plan. PFMC supports a concerted effort to address lamprey vulnerability with respect to accumulation of toxins, chemical spills, stranding due to drop in reservoir levels, timing of migration, and dredging near dams and navigation facilities.

The PFMC appreciates the opportunity to provide comments on the NPCC's Fish and Wildlife Program amendment process.

Signature Block