



Pacific Fishery Management Council

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Dorothy M. Lowman, Chair | Donald O. McIsaac, Executive Director

July 25, 2014

Mr. Bill Bradbury, Council Chair
Northwest Power and Conservation Council
851 SW Sixth Avenue, Suite 100
Portland, OR 97204-1348

Re: Comments on Northwest Power and Conservation Council's Fish and Wildlife Program amendment process

Dear Chairman Bradbury,

In August 2013, the Pacific Fishery Management Council (PFMC) submitted a set of recommendations during an early stage in the Northwest Power and Conservation Council's (NPCC) Fish and Wildlife Program (Program) amendment process. We appreciate that overall, the current Draft 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 relevant fish and wildlife impacts are adequately mitigated for in the Columbia Basin.

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 the 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 appear to have been reduced or insufficiently addressed in the Draft Program: (1) quantitative goals and objectives, and direction regarding monitoring and data management and, (2) regional coordination. 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 two important existing goals to an appendix: 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). 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 Bonneville Power Administration’s funding decisions. Conversations with managers can serve to inform and guide those decisions.

Hatcheries: The 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. While there are noteworthy successful examples of hatchery operations in the Basin, it is unclear that there has been enough focus on achieving the full mitigation debt from habitat alterations, nor structured reporting of evaluations of progress towards the full mitigation goal that is so important to regional fisheries. We recommend increased clarity and focus in these areas.

Testing the Efficacy of Higher Spill Levels: While proper assignment of reasons for the exceptionally promising returns of upriver fall Chinook and sockeye salmon recently has yet to occur, we note the coincidence with higher spill levels than in past years. 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 on reasonably expected results. 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 meaningful spill experiment.

In addition, the 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.

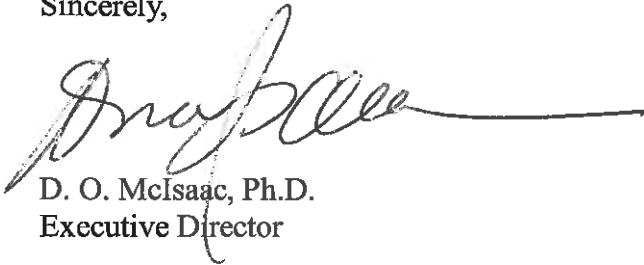
Water Quality and Toxics: The NPCC’s amendment for toxics is an improvement over the 2009 Program, and strengthens engagement in this issue. We agree with the additional research suggested and the role of the NPCC in helping to bring in funding under the Environmental Protection Agency’s (EPA) Large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

Climate Change: It is very important to plan to ameliorate existing and anticipated elevated hydro temperatures, particularly in the fall in the mainstem rivers. The amendment lacks a cohesive vision or the development of a plan to guide specific actions described, and it is unclear if the actions will achieve the desired result. 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. The 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.

Thank you for the opportunity to provide comments on the NPCC's Fish and Wildlife Program amendment process.

Sincerely,

A handwritten signature in black ink, appearing to read "D. O. McIsaac", with a long horizontal flourish extending to the right.

D. O. McIsaac, Ph.D.
Executive Director

JDG:kam

cc: PFMC Council Members
PFMC Habitat Committee
PFMC Salmon Advisory Subpanel
PFMC Salmon Technical Team