

Appendix F

Columbia River Salmon and Steelhead Manager Comments

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INTRODUCTION TO APPENDIX F

Appendix F provides responses to the HSRG's invitation to the federal, state and tribal fishery managers and others to comment on the HSRG's recommendations for every population within their jurisdiction. Comments were provided through a structured, on-line questionnaire and are organized here by species and then by Evolutionarily Significant Unit (ESU), Distinct Population Segment (DPS) or Major Population Group (MPG).

All comments received are displayed verbatim. In many cases, several managers commented on a population report, while in other cases, no comments were received. Population reports that did not receive comments are not included in this appendix. Similarly, if a reviewer did not answer a prompted question from the questionnaire, that question is not included here.

The HSRG made every effort to address errors and omissions identified by the reviewers. Other comments were considered but could not be addressed individually given schedule and budgetary constraints. Some identified mapping issues were resolved, but not all refinements could be addressed given these constraints.

3.1 CHINOOK

3.1.1 Lower Columbia River Chinook ESU

1. Columbia Estuary-Big Creek Fall Chinook (Tule-Natural)

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

2. Columbia Estuary Fall Chinook (Chinook River-Sea Resources)

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

4. Columbia Estuary Spring Chinook (Deep River Net Pens)

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Elochoman Fall Chinook

Commenter Info

Commenter Name: Eric Kinne
Commenter Email: kinneebk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

WDFW has chosen to close the Elochoman Hatchery. WDFW will continue to operate the lower weir to remove hatchery returns and strays.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

6. Grays Fall Chinook

Commenter Info

Commenter Name: Eric Kinne
Commenter Email: kinneebk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Current project is in place to evaluate the abundance of the naturally produced fall Chinook and remove strays in the Grays River. Once this is evaluated, a conservation program may be necessary to restore this population.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

7. Mill/Abernathy/Germany Creek Fall Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

WDFW will not be developing a segregated harvest program at this time.

Mill/Germany/Abernathy is an aggregate population and is part of our Intensively Monitored Watershed (IMW) program, which is looking at how populations respond to habitat improvements.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Deep River Net Pens will be used as a site for a segregated harvest program to make up for reduction in overall production.

9. Columbia Estuary-Youngs Bay Fall Chinook (Rogue Brights-CEDC SAFE-Hatchery)

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
Yes

Implementation Plan

Do you plan to implement the recommendations as presented?
Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?
No

10. Youngs Bay Spring Chinook CEDC SAFE

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
Yes

Implementation Plan

Do you plan to implement the recommendations as presented?
Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?
No

14. Hood River Spring Chinook

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
Yes

Implementation Plan

Do you plan to implement the recommendations as presented?
Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?
No

18. White Salmon Fall Chinook

Commenter Info

Commenter Name: Eric Kinne
Commenter Email: kinneebk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
Yes

Implementation Plan

Do you plan to implement the recommendations as presented?
Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

19. White Salmon Spring Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

20. Wind River Fall Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

21. Wind River Spring Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

22. Lower Columbia Bonneville Fall Chinook

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

23. Cowlitz Spring Chinook

Commenter Info

Commenter Name: Mark LaRiviere

Commenter Email: mlarivie@cityoftacoma.org

Commenter Organization: Tacoma Power

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Cowlitz River spring Chinook. We agree with the program recommendations. No additional comments offered. The HSRG recommendations are consistent with the current Cowlitz River Hydro Project Fisheries and Hatchery Management Plan. The Cowlitz Salmon Hatchery remodel will accommodate the recommended isolation incubation and rearing strategies.

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

24. Cowlitz - Coweeman Fall Chinook Population

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

25. Cowlitz - Toutle Fall Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Program has been modified to a 1.4 million integrated fall Chinook production. WDFW will need to work with the LCFRB regarding changing population designation from Stabilizing to Primary. Discussions have occurred with the LCFRB regarding this proposed change. This change has been submitted to the board for their consideration.

26. Cowlitz Fall Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Currently not all returning adult fall Chinook are adipose fin clipped. Beginning in 2010, all returning fall Chinook adults will be identifiable as to origin (hatchery-natural). At that time, WDFW will identify the numbers, accessibility, and point of origin (Tilton, Lower Cowlitz) of natural origin fish in the watershed and determine their availability for inclusion into the hatchery program. Based on this assessment, it will be determined if this program can meet the standards of a Primary population rather than a Contributing population. WDFW agrees with the HSRG that developing the capability to manage the spawning composition, managing spawning competition and collecting natural origin

broodstock will be challenging. WDFW also agrees that a monitoring program to estimate composition on the spawning grounds (pHOS) is essential.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Mark LaRiviere

Commenter Email: mlarivie@cityoftacoma.org

Commenter Organization: Tacoma Power

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Cowlitz River fall Chinook. We agree with the program recommendations, however, it will be several years before we will be able to implement the recommendations due to the timing of mass marking of the HOR returns to the Cowlitz Salmon Hatchery. Currently lower Cowlitz River fall Chinook spawning population monitoring occurs, and the pHOS is reported in the annual WDFW Cowlitz Evaluations report.

27. East Fork Lewis Fall Chinook (Tule)

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

28. Kalama Fall Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternative below

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Program will increase from 5 million to 7 million smolts. WDFW believes that this will still meet the standards for a Stabilizing population.

Other Comments

Discussions have occurred with the LCFRB regarding this proposed change from a Primary to a Stabilizing designation. This change has been submitted to the board for their consideration.

29. Kalama Spring Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW agrees with the recommendation to change this population to a Stabilizing designation. Discussions have occurred with the LCFRB regarding this proposed change. This change has been submitted to the board for their consideration.

30. Lewis River Spring Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Erik Lesko

Commenter Email: erik.lesko@pacificorp.com

Commenter Organization: PacifiCorp Energy

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

We support the plan assuming pathogen screening recommendations are consistent and do not deviate from statewide disease control policies.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Eliminate egg transfers (of about 270,000 eggs) to Grays River facility. This non-mitigation program likely contributes to stray rates and has no benefit to North Fork Lewis River harvest.

Other Comments

In Sec 3.2 (observations): It should be noted that the initial reintroduction program will start with hatchery origin chinook and continue uninterrupted for 15 years. Over time, the proportion of NOR and Natural Origin Spawners will increase. Thus the last statement of paragraph No. 1 (Observations) can be confusing.

31. North Fork Lewis Fall Chinook (Lower River Brights)

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

34. Sandy Spring Chinook

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Broodstock conversion is complete. We transitioned to 70% F1 hatchery returns and 30% wild fish returning to the Upper Sandy Basin in 2007.

Collection sites for spring Chinook broodstock are currently being developed in upper Sandy Basin (e.g. Salmon River, Still Creek). Staff will utilize angler caught fish, traps, and seines to collect the wild component of the broodstock in the future.

35. Washougal Fall Chinook

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Currently not all returning adult fall Chinook are adipose fin clipped. Beginning in 2010, all returning fall Chinook adults will be identifiable as to origin (hatchery-natural). WDFW have incorporated part of the recommendations as follows. The new program consists of a 900,000-integrated component and a harvest program of 2.1 million to be released from net pens in the Columbia estuary (Youngs Bay). In addition to these program changes, a lower river weir will be installed to manage composition on the spawning grounds. WDFW believes that this program will meet the standards for a Primary population.

36. Willamette - Clackamas Fall Chinook Salmon

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

We are not aware of any stray hatchery fall Chinook in the Clackamas Basin. Stray fall Chinook from past hatchery programs in the Upper Willamette may have come into the Clackamas in the past but all fall Chinook programs in the Willamette Basin were discontinued in 1998.

District staff does not believe that the historic population of fall Chinook found in the Clackamas Basin were tule chinook. Early spawning fall Chinook were most likely the by-product of past hatchery programs and the true run timing of fall Chinook likely followed that of later spawning Chinook found in the Sandy and Lewis River. Naturally

high water temperature in early fall limited successful spawning in the lower river until conditions improve in mid-late October. Naturally spawning fall Chinook are currently found in the McIver Park area in November.

3.1.2 Upper Willamette River Chinook ESU

2. Willamette - Clackamas Spring Chinook Salmon

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Current release locations and numbers: Foster Creek (50,000), Cassidy Pond (50,000), Clear Creek (50,000), Eagle Creek (200,000), Clackamette Cove (80,000 acclimated, no direct release), Clackamas Hatchery (300,000 sub-yearling on-station release in November), Clackamas Hatchery (470,000 spring on-station).

4. Willamette - McKenzie Spring Chinook Salmon

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Willamette - Middle Fork Willamette Spring Chinook Salmon**Commenter Info**

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

6. Willamette - Molalla Spring Chinook Salmon**Commenter Info**

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

District staff is working with local partners to investigate opportunities to develop a local broodstock utilizing returning hatchery fish to the Molalla or a completely new broodstock from a source yet to be identified. We will also investigate the possibility of developing a reintroduction program utilizing hatchery fish to supplement the few wild fish that may remain in the Molalla River.

7. Willamette - North Santiam Spring Chinook Salmon

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

8. Willamette - South Santiam Spring Chinook Salmon

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.1.3 Middle Columbia River Chinook ESU

2. American River Spring Chinook

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes. However, developing adult monitoring facilities in the lower Naches R. is problematic because the Naches is a large river and there are no existing barriers (e.g., irrigation diversion dams) to adult migration that can be used to effectively capture adults (the two diversion dams on the lower river are small and do not block fish passage). Adult monitoring is accomplished by conducting thorough spawning ground surveys/carcass recovery. YN technicians conduct multiple spawning surveys and assess all carcasses for hatchery strays.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes. It is WDFW's intention to continue to implement mark-selective terminal sport fisheries to harvest adipose-clipped CESRF hatchery fish, which reduces impacts to American R. NOR's and helps decrease PHOS on the upper Yakima R. spawning grounds.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Both "No" entries are default only. Nothing checked.

Other Comments

Delete all hatchery facilities from the map to signify that no hatchery spring chinook are released into the American R, all production is NOR's produced in the depicted EDT American R. spawning reach.

3. Deschutes Spring Chinook

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

8. Columbia Ringold Hatchery Spring Chinook

Commenter Info

Commenter Name: John A. Easterbrooks
Commenter Email: eastejae@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

No funding to continue this program (see below).

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Both "No" are default entries only as none were checked.

Other Comments

The surplus adults that were provided to the CTUIR in return years 2002 (121 age 4's) and 2003 (21 age 5's) were the last of the BY98 Mitchell Act fish that were released prematurely in Jan. 2000 after the MA funding was terminated. Subsequently, the CTUIR funded two additional years of smolt production, BY03 (418,593 released) and BY04 (483,249 released) to provide additional adults for their S.F. Walla Walla R. reintroduction program. Adults from the CTUIR production returned in 2007 (910 age 4's) and 2008 (1,050 age 4's + 62 age 5's) and 72 BY04 age 5's are forecasted to return in 2009. There was no funding for any BY05 production, but WDFW secured state funding to produce 330,231 BY06 smolts released in April 2008. BY06 fish will return from 2009-11 (age 3's - age 5's).

9. Umatilla Spring Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Do not have the transport capabilities to haul two broodstock groups as well as potentially two upriver release groups.

No acclimation facility located in headwater area.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The Umatilla natural population is not large enough to initiate this program at the level recommended.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

We are initiating this stepping stone program in 2009 with a conservation group of 150K and a harvest component of 660K rather than 250K and 560K as recommended.

The two groups will be differentially marked as recommended with the conservation group direct stream released higher in the basin.

Other Comments

In the future the intent would be to expand the conservation group program size up to the recommended level.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Not as prescribed; we plan to implement a conservation group of 150,000 smolts with 100% natural origin adults. Although the HSRG recommendation was 210,000 groups, the managers did not feel like there are enough returning adults to provide the full amount and also provide some natural fish escapement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Plan meets the pHOS

Other Comments

Major changes in this program will require US v Oregon policy agreement. The changes that we are implementing incorporate some of the HSRG recommendations.

10. Upper Yakima Spring Chinook

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

WDFW will continue to try to reduce upper Yakima R. pHOS by implementing mark-selective terminal sport fisheries for CESRF hatchery fish (adult progeny of NOR x NOR and HOR x HOR crosses), while protecting NOR's from the American R., Naches River and upper Yakima R.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Both "No" entries are default only. Nothing was checked.

Other Comments

1) Delete all hatchery facility references on the map except the Cle Elum Hatchery and the three acclimation sites (Easton, Jack Creek and Clark Flat), these are the only facilities related to this population.

2) Beginning with the 2002 terminal sport fishery, harvest has been selective for upper Yakima HOR's. The sport fishery was non-selective in 2000 (test fishery limited to four weekends in June, approximately 100 fish harvest) and in 2001.

11. Walla Walla River Spring Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Required facilities to collect broodstock currently exist in-basin and natural production is already occurring.

Transition to an integrated program utilizing local brood will occur in concert with implementation of the Walla Walla Hatchery Master Plan.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

The Walla Walla Hatchery Master Plan is currently under review by the NPCC. When accepted the plan is to construct a hatchery in the Walla Walla Basin to produce a program of 500K smolts using local broodstock.

Other Comments

Disagree with the NOS escapement estimates used for the basin in the HSRG review. Data collected in-basin over the past few years suggest a higher capacity as documented in the WWHMP.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.1.4 Deschutes Summer-Fall Chinook ESU

No comments received.

3.1.5 Upper Columbia River Spring Chinook ESU

1. Entiat River Spring Chinook

Commenter Info

Commenter Name: Stephen Grabowski
Commenter Email: sgrabowski@pn.usbr.gov
Commenter Organization: Bureau of Reclamation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Qualified and conditional no. My comments below in "other" primarily address the Entiat National Fish Hatchery program, which is funded in part by Reclamation, along with BPA. Discussions are in progress on hatchery reforms based on the FWS HRT report. FWS operates the Entiat Hatchery for the funding agencies. Reclamation typically defers to FWS on detailed technical feasibility issues.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Qualified and conditional no. This report is still a draft, and discussions are in progress on hatchery reforms at the Entiat NFH based on the FWS HRT report. FWS operates the Entiat Hatchery for the funding agencies. Any implementation of recommendations must be reviewed by the funding and operating entities.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

Qualified and conditional no. This report is still a draft, and discussions are in progress on hatchery reforms based on the FWS HRT report. FWS operates the Entiat Hatchery for the funding agencies. Any alternative plan must be reviewed by the funding and operating entities.

Other Comments

Specific technical comments:

Note: This draft report follows a format similar to the three reports for the upper Columbia River programs commented on above. Since the Carson-stock spring Chinook salmon program at Entiat NFH has been terminated and production switched at least temporarily to production of coho salmon, this report ought to acknowledge that the program at Entiat NFH is in transition and that several program options are being discussed, although no final decision regarding the future program at Entiat has been made at this time.

Page 2, line 1. Suggest inserting “ is part of the Upper Columbia River spring-run Chinook salmon ESU that”

Page 2, 1st paragraph, line 4. “[L]isted,” would be a more appropriate word than “classified” for indicating the endangered status of the Upper Columbia river spring Chinook salmon ESU.

Page 2, 2nd paragraph, line 4. S/S growth rate. Should this be S/S (or R/S) productivity?

Page 2, 3rd paragraph, line 2. Insert “spring Chinook salmon have similar life-history characteristics as those the spring/summer Chinook salmon runs originating in the Snake River”

Page 2, section 2, 2nd paragraph, line 2. Here the report says a 12-year geometric mean while in the first line on page 3 the report says an 8-year geometric mean. There should be consistency throughout the reports or adequate explanation as to why different time periods were used.

2. Methow River Spring Chinook

Commenter Info

Commenter Name: Stephen Grabowski

Commenter Email: sgrabowski@pn.usbr.gov

Commenter Organization: Bureau of Reclamation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Qualified and conditional no. My comments below in "other" primarily address the Winthrop National Fish Hatchery program, which is funded in part by Reclamation,

along with BPA. Discussions are in progress on hatchery reforms based on the FWS HRT report. FWS operates the Leavenworth Hatchery for the funding agencies. Reclamation typically defers to FWS on detailed technical feasibility issues.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Qualified and conditional no. This report is still a draft, and discussions are in progress on hatchery reforms at the Winthrop NFH based on the FWS HRT report. FWS operates the Winthrop Hatchery for the funding agencies. Any implementation of recommendations must be reviewed by the funding and operating entities.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

Qualified and conditional no. This report is still a draft, and discussions are in progress on hatchery reforms based on the FWS HRT report. FWS operates the Winthrop Hatchery for the funding agencies. Any alternative plan must be reviewed by the funding and operating entities.

Other Comments

Page 2, 1st paragraph, line 4. “[L]isted,” would be a more appropriate word than “classified” for indicating the endangered status of the Upper Columbia river spring Chinook salmon ESU.

Page 2, 2nd paragraph, line 2. Insert “spring Chinook salmon have similar life-history characteristics as those the spring/summer Chinook salmon runs originating in the Snake River.”

Page 2, section 2, 1st paragraph, line 5. The draft states that the release of out-of-basin Carson stock spring Chinook salmon was eliminated in 2006. I think that Carson stock releases were terminated about 2000 and returning adults from these releases were mostly completed by 2003.

Page 3, line 1. Insert “are part of the Upper Columbia River Spring-run Chinook salmon ESU.”

Page 3, 5th bullet statement continuing from Current Population Status and Goals from page 2. This bullet is Habitat Productivity and Capacity, and lists two Methow River populations. It is unclear what this bullet statement means. Does “capacity” refer to

carrying capacity? And of adults or juveniles? Are the productivity numbers listed the current productivity for each of those two populations?

Page 3, section 2.2 Current Hatchery Programs, 2nd paragraph under Methow Spring Chinook, line 3. “Compost” most likely should be “composite.”

Page 3, section 2.2 Current Hatchery Programs, 1st paragraph under Winthrop NFH Spring Chinook, line 4. It would add clarity to the report to note that the Carson stock spring Chinook salmon program at the Winthrop NFH was phased out by 2003.

Page 3, footnote number 3. This footnote is vague and should be clarified.

Page 4, first two bullet statements. The draft report should explain or note how the number of hatchery strays were determined or estimated.

Page 4, section 3.1, Effect on Population, 1st paragraph, line 2. Presumably fish from this program do not migrate in the Snake River so we suggest deleting Snake River from this discussion.

Page 4, section 3.1, Effect on Population, 2nd paragraph. This paragraph requires some additional explanation. It needs to explain why removal of either hatchery program results in the same increase in adjusted productivity, yet the average abundance of natural-origin spawners in the Methow River goes from 433 to 461, while removal of the Twisp Hatchery results in average abundance of natural-origin spawners going from 82 to 123 fish. What is the time frame for this to occur? Or over how many generations? Are these increases an output of the AHA model? The statement about harvest contributions of the natural and hatchery populations decreasing from 255 fish to about 72 fish with removal of the Methow hatchery and from 57 to 19 fish with removal of the Twisp Hatchery needs to be explained better.

Page 5, 2nd paragraph under Observations. The first sentence addressing current habitat productivity and capacity would benefit from additional explanation.

Page 6, line 4. Provide more detail and explain the statement “[t]his is because of the low productivity and capacity.”

Page 6, under Recommendations, line 4. where the report says “and maintain the abundance,” why not say increase the abundance of natural-origin spawners?

Page 6, discussion under composite Chewuch-Methow and Twisp population components. The report here does not seem to provide much in the way of guidance or detail on how to increase productivity and capacity. It appears to be left to the devices of the operators on how to do this.

Page 7, Winthrop NFH. The report mentions the BKD “agent.” It would be more accurate to say the BKD bacterium or causative agent, which is the bacterium *Renibacterium salmoninarum*.

Commenter Info

Commenter Name: Tom Kahler
Commenter Email: Tkahler@dcpud.org
Commenter Organization: Douglas PUD

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendations for Methow spring Chinook are status quo, but for the development of the broodstock collection “variable sliding scale,” intended to increase NOS during years of low abundance. Douglas PUD acknowledges the logic of the sliding-scale approach, but cannot unilaterally commit to implementation of the recommendations as presented. Management of the hatchery programs funded by Douglas PUD is governed by the Wells Hydroelectric Project Habitat Conservation Plan (Wells HCP) Hatchery Committee, consisting of representatives of each Party to the HCP, including the Colville Confederated Tribes, Douglas PUD, the National Marine Fisheries Service, Washington Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, and the Yakama Nation. Each of these parties has a unique perspective on hatchery management and the role of hatcheries in the recovery of Threatened and Endangered species. In some cases, these perspectives are widely divergent. Wells HCP Hatchery Committee decisions are by unanimous consensus. Thus, we cannot presuppose the outcome of the ongoing Committee discussions regarding the future management of the hatchery programs funded by Douglas PUD, although program changes are likely. The Hatchery Committee will consider implementation of the variable sliding scale as one tool in the management of Methow spring Chinook. Douglas PUD agrees that conservation objectives for Methow spring Chinook could be achieved with production from either the Winthrop NFH or the Methow Hatchery, and that the number of natural-origin fish is insufficient to properly integrate the current production from both facilities. The Douglas PUD mitigation obligation for Methow spring Chinook is presently at 61,071 smolts produced at Methow Hatchery, and 288,000 smolts are also produced for Chelan PUD mitigation; the remaining capacity comprises production for Grant PUD. Smolt production numbers for the Methow Hatchery will be reevaluated in 2013, and will certainly be adjusted. Additionally, future production from Winthrop NFH is uncertain both in species and numbers of fish produced, and the target

release location. The HSRG justifiably declined the Douglas PUD request to model three alternative management scenarios with variable release numbers from Winthrop NFH and Methow Hatchery. Therefore, Douglas PUD will likely pursue modeling of various management scenarios to inform imminent management decisions by the Wells HCP Hatchery Committee in the face of anticipated changes in production obligations at Methow Hatchery and potential changes in the nature of production at Winthrop NFH.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

We are unaware of any releases of Methow Hatchery spring Chinook to Lake Creek (tributary to the Chewuch River) as noted on Page 3, Section 2.2(1), Line 6. Please add an “T” between the “s” and “t” in the “Compost” found in the phrase “Methow Compost stock” on Page 3, Section 2.2(1), second paragraph, at the end of line 3.

Commenter Info

Commenter Name: Jeff Korth
Commenter Email: korthjwk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Yes - With Comment

Use Excess Winthrop NFH Hatchery Capacity for Other Purposes. Yes. WDFW regional staff believes this is a very reasonable recommendation. The WNFH currently does not possess traps to collect wild broodstock, therefore the Conservation/Recovery portion of the basin program should be conducted at the Methow Fish Hatchery. Of the HSRG options proffered, WDFW prefers spring Chinook reintroduction into the upper Okanogan / Similkameen Rivers in combination with use of the station as a steelhead acclimation facility. The Methow FH would continue to focus on spring Chinook production for Supplementation and Recovery purposes.

Continue Status Quo Met-Comp and Twisp Programs With a Sliding Abundance Scale. Yes, in part. Habitat in the Methow Basin currently limits recovery potential, but some

gains may be made with habitat improvements. It is usually impossible to meet smolt production, PNI, and escapement goals simultaneously. WDFW plans to continue to manage on an individual stock (Twisp and Met-Comp) basis to the extent possible. Tagging and genetic screening of spring Chinook at the Priest Rapids Dam OLAFT would provide a means to aid discrimination between Twisp and non-Twisp stocks at Wells Dam, in conjunction with collections at the Twisp Weir. At least one additional weir is needed on the mainstem Methow and Chewuch Rivers for spring Chinook and steelhead management.

Option: Maintain WNFH spring Chinook Production for Harvest Augmentation. No. See Other Comments.

BKD Control: Yes. WDFW is in the process of revising its BKD control strategy allowance for culling at all stations where needed is a goal of that effort. WDFW regional staff agree with the HSRG judgments and recommendations regarding more effective culling and BKD control. However, WDFW does not support culling natural origin ESA-listed stocks.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The principal management issues include:

- a) Introgression of Carson stock spring Chinook with Methow basin stocks has likely contributed heavily to lost natural origin fish productivity. An updated assessment of current genetic stock identification and the potential for increased natural production would help set long term management objectives.
- b) The new Twisp River weir provides reasonable opportunity to manage overall escapement, run composition, and wild brood collection. Similar facilities on the mainstem Methow (e.g. Methow Valley Irrigation District dam) and Chewuch River would help immensely in the management of several species in the basin.
- c) New or expanded marking programs are needed to enable more reliable and accurate run size prediction.

Regarding #3 above (the “Option”), WDFW regional staff prefers Recommendation #1, above, since adult removal at WNFH may not be sufficient to address PNI, and terminal fisheries alone cannot adequately control pHOS.

Commenter Info

Commenter Name: Julie Collins

Commenter Email: julie_collins@fws.gov

Commenter Organization: usfws-Leavenworth NFHC

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Regarding the BKD control strategy, the federal program has implemented a BKD control strategy incorporating culling of high and moderate ELISA OD level eggs, isolating high level eggs and injecting adult females with erythromycin (pre-spawning). This strategy or program has been in effect for more than 10 years. Regarding the recommendation for an azithromycin preference as the recommended antibiotic for pre-injection of adult female broodstock. The USFWS does not support this recommendation based on the following: Though azithromycin is a very effective antibiotic, it is also considered by FDA as a critical drug for human medicine. Judicious use should be considered in the use and disposal of the drug, and its use in food animals, particularly regarding the potential to induce antibiotic resistance. Currently, it can only be legally accessed through an extra label veterinary prescription. Use of azithromycin should be on a “case-by-case basis”, for very imperiled stocks.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

USFWS, in cooperation with the Upper Columbia River co-managers is currently reviewing the Winthrop NFH program in the context of the USFWS Hatchery Review Team Recommendations, The FCRPS Biological Opinion, U.S. v. Oregon and the HSRG recommendations. Many of the HSRG recommendations duplicate those of the USFWS HRT recommendations, which the Service intends to implement. At this time, the future plan and strategy for the Winthrop NFH, is still being discussed and formulated amongst the co-managers

3. Okanogan River Spring Chinook

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The Joint Fishery Parties have not come to agreement on the preferred approach for Okanogan spring Chinook. Other comments:

WDFW regional staff is in general agreement with the principles and approach suggested, however location and development of in-basin water supplies of suitable quality and quantity is highly problematic. Initial local natural origin brood development is most likely from either Canadian habitat, or from the Similkameen River.

- 1) Use a Phased Transition Approach for Spring Chinook Reintroduction: WDFW regional staff supports this recommendation with the acknowledgement that natural production is likely to be very limited in the basin below Zosel Dam. Coordination with Canadian managers is needed to realize much recovery potential. Tagging and genetic screening of natural origin spring Chinook at the Priest Rapids Dam OLAFT would likely enhance stock sorting or brood collection at Wells Dam. In-basin hatchery and/or acclimation facilities are needed; over-winter survival has been a major problem in some existing acclimation facilities. If suitable acclimation facilities can be sited and developed, the OLAFT operations would facilitate initial broodstock development.
- 2) Enhance Harvest with a Segregated Production Program: Joint Fishery Party members (Colville Tribes) have not decided whether the Chief Joseph Dam program would simply be an extension of the Methow FH program. WDFW regional staff supports use of Winthrop NFH capacity for a segregated, marked fish program, or use of Carson stock for the same purpose. Stray fish management would be a primary concern, and would require the ability to remove strays from the Twisp and Methow basins at weirs located below spring Chinook spawning areas.

BKD Control: WDFW is in the process of revising its BKD control strategy allowance for culling at all stations where needed is a goal of that effort. WDFW regional staff agree with the HSRG judgments and recommendations regarding more effective culling and BKD control.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No, other than continuation of Colville Tribes' exploration of potential brood collection and test reintroductions.

Other Comments

The principal management issues include:

- a) Re-introduction of spring Chinook that result in significant returning run sizes will create mixed stock fishery problems, particularly above Wells Dam. However, suitable marking or GSI programs could allow brood collection at Wells Dam in concert with a well-regulated fishery in the Okanogan River mouth area and Columbia River mainstem below Chief Joseph Dam.
- b) New or expanded marking programs are needed to enable more reliable and accurate run size prediction and selective fisheries if a future integrated program is developed in the Okanogan River basin.

4. Wenatchee River Spring Chinook

Commenter Info

Commenter Name: Steven Hays

Commenter Email: steve.hays@chelanpud.org

Commenter Organization: Chelan County Public Utility District

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Yes - With Comment

Incorporate a sliding scale and adult brood management: For most if not all of the sub-populations, periodic low PNI in years of low natural origin fish abundance to maintain escapement goals is offset by projected increased productivity where pHOS is controlled, and PNI is generally held to 0.67 values or higher during years of larger natural origin fish run sizes.

Although the White River basin is unlikely to support sufficient natural origin spawners to achieve a Primary designation, it certainly can be a Contributing sub-population to the overall Wenatchee River population. Progress is being made in the long term plan to fully transition from a captive brood program to an adult-based brood program, perhaps as early as 2013. The HCP mitigation level of 150K smolts is consistent with overall integrated Wenatchee Basin management as long as pHOS is controlled in the White River by hatchery fish removals at Tumwater Dam.

The Chiwawa River sub-basin is large enough to serve as a Primary sub-population in its own right (>500 natural origin spawners). However, the current HCP mitigation level of 672K smolts is inconsistent with overall integrated Wenatchee Basin management unless pHOS is controlled in the Chiwawa River by large scale hatchery fish removals at Tumwater Dam, and perhaps also at the Chiwawa weir.

Although the Nason Creek basin is unlikely to support sufficient natural origin spawners to achieve a Primary designation, it certainly can be a Contributing sub-population to the overall Wenatchee River population. Progress is being made in the long term plan to implement an adult-based brood collection program using a weir in Nason Creek, or pedigree-based adult collections at Tumwater Dam. The HCP mitigation level of 250K smolts is consistent with overall integrated Wenatchee Basin management as long as pHOS is controlled in Nason Creek by hatchery fish removals at Tumwater Dam. Regarding a transition at the LNFH to use of Wenatchee River stock, the success (relative survival) of the Carson stock mandates caution in its replacement. WDFW regional staff support a reduced, and fully-marked Carson-origin program so that all Carson stock adults can be removed at Tumwater Dam. Replacement of at least a portion of the LNFH production with Wenatchee River-origin spring Chinook would diminish the ill effects of strays into the upper basin.

BKD Control: Yes. WDFW is in the process of revising its BKD control strategy allowance for culling at all stations where needed is a goal of that effort. WDFW regional staff agree with the HSRG judgments and recommendations regarding more effective culling and BKD control. However, WDFW does not support culling natural origin ESA-listed stocks.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The principal management issues include:

- a) The need to control hatchery fish escapement (pHOS) while maintaining adequate overall escapement in all sub-populations. WDFW regional staff believes it has a strategy to achieve this using a sliding scale approach.
- b) Uncertainty about funding annual parental-based tagging and adult brood collection as an interim step to sub-population recovery.
- c) Need for a complete suite of acclimation sites in all supplemented sub-populations, located high in each sub-basin.
- d) Development of a reliable ability to predict run size early and in-season each year to schedule adult collection and removal activities, yet meet escapement and brood collection goals.
- e) Successfully educate the public as to the need for, and acceptance of hatchery fish removal using various methods in addition to sport and commercial harvest.

Commenter Info

Commenter Name: Julie Collins

Commenter Email: julie_collins@fws.gov

Commenter Organization: usfws-Leavenworth NFHC

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Regarding the BKD control strategy, the federal program has implemented a BKD control strategy incorporating culling of high and moderate ELISA OD level eggs, isolating high level eggs and injecting adult females with erythromycin (pre-spawning). This strategy or program has been in effect for more than 10 years.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

Other Comments

USFWS, in cooperation with the BOR is currently in the process of replacing its water supply infrastructure. Major changes to the Leavenworth NFH production program will be considered once a dependable water system is in place to support future fish production programs. Based on the USFWS HRT recommendations, recent changes to the Leavenworth Program include a reduction in smolt production (from 1.625 to 1.2M), reduction in overall CWT's (to increase distinction between Leavenworth SCS and listed WDFW SCS at Tumwater dam), and strategies to remove Leavenworth SCS at Tumwater (see USFWS-Mid-Columbia FRO comments).

Commenter Info

Commenter Name: russell langshaw

Commenter Email: rlangsh@gcpud.org

Commenter Organization: Grant County PUD

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendations may be implemented as presented. The Priest Rapids Coordinating Committee and its Hatchery Subcommittee are the decision making forums for this program. Program modifications are made by consensus and the HSRG recommendations will not be fully reviewed and discussed until the final report is complete.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Section 2.2.2 Wenatchee River/White River Captive Brood (Eastbank Hatchery): Egg incubation no longer occurs at the AquaSeed facility. All incubation and early rearing occurs at the Little White Salmon National Fish Hatchery. This is expected to continue into the foreseeable future and we have no intention of constructing a central hatchery facility in the White River basin. The only fish culture activity that will occur in the White River basin is late rearing/acclimation.

Commenter Info

Commenter Name: Stephen Grabowski

Commenter Email: sgrabowski@pn.usbr.gov

Commenter Organization: Bureau of Reclamation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Qualified and conditional no. My comments below in the "other" section primarily address the Leavenworth NFH program, which is funded in part by Reclamation, along with BPA. Discussions are in progress on hatchery reforms based on the FWS HRT report. FWS operates the LNFH for the funding agencies. Reclamation typically defers to FWS on detailed technical feasibility issues.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Qualified and conditional no. This report is still a draft, and discussions are in progress on hatchery reforms at Leavenworth NFH based on the HRT report. FWS operates the Leavenworth Hatchery for the funding agencies. Any implementation of recommendations must be reviewed by the funding and operating agencies.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

Qualified and conditional no. This report is still a draft, and discussions are in progress on hatchery reforms at Leavenworth NFH based on the HRT report. FWS operates the Leavenworth Hatchery for the funding agencies. Any alternative plan must be reviewed by the funding and operating agencies.

Other Comments

Specific technical comments:

Page 2, line 9. The draft states that intrinsic productivity greater than 1.75 recruits per spawner (R/S) with an abundance of wild spawners of 2000 fish, while on page 3, line 7 the draft says a productivity of 1.2 with about 2,000 spawners. This is an apparent contradiction and needs to be clarified.

Page 3, 3rd bullet statement continuing from Current Population Status and Goals from page 2, line 2. Does productivity refer to intrinsic productivity as noted earlier?

Page 3, 4th bullet statement continuing from Current Population Status and Goals from page 2. This bullet is Habitat Productivity and Capacity, and lists four Wenatchee River populations. It is unclear what this bullet statement means. Does ,”capacity” refer to carrying capacity?

Page 3, section 2.2, current Hatchery Programs, 1st paragraph, line 9. the draft states “progress to determine the success of the Chiwawa Hatchery population,” What does the report mean by success? This needs to be more specific.

Page 4, first line. The first line (continued from page 3) states that 500 adult spring Chinook are released into Peshastin and Ingalls creeks. For clarity better and understanding of the program, the draft should note why this release occurs, and what it is intended to accomplish. Is it to improve spatial structure, reestablish fish in suitable but currently unoccupied habitat, or some other reason?

Page 4, first two bullet statements. The draft report should explain or note how the number of hatchery strays were determined or estimated.

Page 4, section 3.1, 1st paragraph, line 2. Presumably fish from this program do not migrate in the Snake River so suggest deleting Snake River from this discussion.

Page 4, section 3.1, 2nd paragraph, line 4. Since this paragraph discusses a No Hatchery scenario, it is unclear why harvest contribution of the “natural and hatchery populations would go from.” If this scenario is no hatchery, where do the hatchery fish come from? This reference to hatchery populations also occurs several other places in this discussion. It is unclear why in some cases the harvest contributions increase while in other cases they decrease.

Page 7, Recommendations. Two options are suggested, one includes transitioning the Leavenworth National Fish Hatchery to a locally-derived broodstock, while the other leaves the LNFH program unchanged. The draft does not say anything about how to develop a locally-derived brood stock for the LNFH. Is this to be left to the hatchery operators to determine in an HGMP as part of ESA consultation or permitting?

Page 8, Leavenworth National Fish Hatchery. The statement that co-managers are considering transitioning the current broodstock to a Wenatchee-based broodstock is a subject of current discussion among agencies and tribes. Consideration of the subject report, the HGMP, the HRTs recent evaluation and the FCRPS BiOp, as well as mitigation requirements will all contribute to any change in hatchery practices at Leavenworth facilities. It goes on to say that if co-managers decide to replace the current Leavenworth stock, they should consider maintaining “this stock” at another suitable location or by maintaining a smaller program at Leavenworth Hatchery. This statement is vague and needs to be clarified. It isn’t clear which stock the report is discussing, the current stock or the new, future, Wenatchee-based broodstock.

3.1.6 Upper Columbia Summer-Fall Chinook ESU

2. Methow Summer Chinook

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

No, with the exception of BKD control. Also see "Other Comments".

BKD Control: WDFW is in the process of revising its BKD control strategy allowance for culling at all stations where needed is a goal of that effort. WDFW regional staff agree with the HSRG judgments and recommendations regarding more effective culling and BKD control.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The no above for "meeting HSRG Standards" was entered as a default only. Comment was entered as N/A.

Additional comment to Yes "Have you developed alternative recommendation plan"

Yes status quo. The multiple technical challenges of the HSRG Recommendations have not been addressed; the primary need is verification that a unique Methow River spawning aggregate even exists. Secondarily, the feasibility of within-basin adult capture (broodstock and adult management) strategies need to be developed if the population is to be managed as primary or contributing.

Other Comments

Determine population structure: It would be very useful to learn whether there is genetic evidence of a separate spawning aggregate of summer Chinook in the Upper Columbia River, including the Methow River. WDFW regional staff believes the recommended analyses should be run, if funding is available, particularly since the results would be essential to develop and assess the feasibility of a stock specific integrated management program for the Methow population. This is a logical, if not critical first step to help define potential or preferred stock and brood management options.

Distinct Population Option; Manage Methow Brood Collection in an Integrated Program: If a Methow sub-population is verified (deemed unlikely), management of an integrated program would be technically very challenging. UCR summer Chinook endure high exploitation rates in marine fisheries. However, WDFW regional staff supports collection and analysis of genetic information on stock structure to help evaluate proposed or potential programs. In addition, the EDT and other values used to parameterize the AHA Model should be updated or verified to be certain an integrated program is not likely to be feasible.

Initiation of an integrated program using brood collected at one or more adult collection facilities on the mainstem Methow and/or its tributaries and managing for a Primary or Contributing Population would require derivation of NOS and PNI statistics from Methow River spawning areas. Spawning ground surveys in the Methow Basin have been variable over time, including peak and total redd surveys. Because precision of both methods can be influenced by run-size, output generated from these methods need to be standardized/modeled to appropriately describe or have confidence in prior years' escapement estimates and associated NOS and PNI statistics. WDFW in coordination with the HCP process(es) are investigating the feasibility of standardizing prior escapement data. Until this effort is completed, categorizing this population as primary, contributing, or supporting is premature. Should NOS and PNI statistics satisfy criteria for a primary or contributing population, in-basin and adult collection facilities/strategies will be required. Currently no adult summer Chinook collection facilities exist in the Methow Basin. WDFW has been met with opposition from local constituents regarding weirs in the Methow basin for management of listed species and there is every expectation that opposition will be prominent with this program as well. WDFW expects that alternative adult collection strategies will be required in the Methow Basin and is looking closely at the findings of the Colville Tribes alternative adult collection investigation efforts as a possible mechanism for adult collections in the Methow Basin. Protection of any Methow River natural origin spawning component would require more effective selective harvest in the ocean and mainstem Columbia River, limiting the contribution of hatchery fish to spawning areas, and more accurate and timely run prediction to make in-season adjustments.

Indistinct Population Option; Manage Methow Brood as a Component of the Aggregated Wells Collection: The current program of aggregated brood collection would continue as currently conducted at Wells Dam. Following this strategy into the future eliminates any genetic uniqueness or stock structure of the Methow sub-population.

Investigate causes of poor Carlton Acclimation Pond smolt releases: More detailed studies could be conducted, but local knowledge on conditions includes these facts: Highest ELISA-value cohorts are ponded at Carlton. Additionally, the Carlton program includes short-term acclimation rather than the over-winter acclimation consistent with the Okanogan/Similkameen program. If these issues are addressed greater survivals from Carlton are likely.

Collect brood throughout the run timing: Currently brood collection occurs between July 1 and September 14. Although this schedule misses the early and latest returning fish, it is consistent with provisions of the Section 10 permit. Collections are delayed until July 1 to avoid conflict with ESA listed spring Chinook and conclude in mid-September for BKD management purposes. Summer Chinook typically begin spawning during the first week of October. To achieve efficacy of Erythromycin injections broodstock collection must terminate approximately two weeks prior to the onset of spawning.

Commenter Info

Commenter Name: Steven Hays

Commenter Email: steve.hays@chelanpud.org

Commenter Organization: Chelan County Public Utility District

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and

Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD, Ås hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3. Okanogan Summer Chinook

Commenter Info

Commenter Name: Steven Hays

Commenter Email: steve.hays@chelanpud.org

Commenter Organization: Chelan County Public Utility District

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of

Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Yes - With Comment

Yes, in theory. See comments under Implementation.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Manage Okanogan Summer Chinook as an Integrated Program:

If an Okanogan sub-population is verified (deemed unlikely), management of an integrated program would be technically very challenging. UCR summer Chinook endure high exploitation rates in marine fisheries. However, WDFW regional staff supports collection and analysis of genetic information on stock structure to help evaluate proposed or potential programs. In addition, the EDT and other values used to parameterize the AHA Model should be updated or verified to be certain an integrated program is not likely to be feasible.

Initiation of an integrated program using brood collected at one or more adult collection facilities on the mainstem Okanogan and/or its tributaries and managing for a Primary or Contributing Population would require derivation of NOS and PNI statistics from Okanogan River spawning areas, and collection of adults for brood across the full run timing in the Okanogan River. Currently there are no adult collection capabilities in the mainstem Okanogan River, and use of alternative adult collection methods (purse seine, tangle nets, weirs and beach seine) in the river mouth area may be problematic. The

Colville Tribes are investigating alternative adult collection methods for the purposes of developing stock-specific summer Chinook programs in the Okanogan River. WDFW is keenly interested in the outcome of the Tribes' efforts towards alternative adult collection. If successful, alternative adult collection methods may make stock specific management and increase adult removal feasible. Protection of any Okanogan River natural origin spawning component would require more effective selective harvest in the ocean and mainstem Columbia River, limiting the contribution of hatchery fish to spawning areas, and more accurate and timely run prediction to make in-season harvest adjustments.

Manage for an Enlarged Integrated Program: A larger smolt production program (> 576K) appears to be possible if pHOS can be adequately controlled. This is not possible using current, terminal fisheries.

BKD Control: WDFW is in the process of revising its BKD control strategy allowance for culling at all stations where needed is a goal of that effort. WDFW regional staff agree with the HSRG judgments and recommendations regarding more effective culling and BKD control.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The no above for "meeting HSRG Standards" was entered as a default only. Comment was entered as N/A.

Additional comment to "Have you developed an alternate recommendation plan"

No other than status quo. The multiple technical challenges of the HSRG Recommendations have only been partially addressed (test fisheries for brood collection); the primary need is verification that a unique Okanogan River spawning aggregate even exists.

Other Comments

The principal management issues include definition of stock structure, and the feasibility of, or need for Okanogan River sub-population management. Obtaining information to answer this question should be the highest priority, and that approach is supported by WDFW regional staff.

4. Upper Middle Columbia Mainstem Hatchery Summer Chinook

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Yes - With Comment

See the following comments:

1) Determine population structure: It would be very useful to learn whether there is genetic evidence of a mainstem spawning aggregate of summer Chinook in the Upper Columbia River. WDFW regional staff believes the recommended analyses should be run, if funding is available, particularly since the results would be very useful to develop and assess management options. This is a logical, if not critical first step to help define potential or preferred stock and brood management options. The genetic analysis may not be simple or straight-forward since WDFW regional staff believes, based on carcass recoveries in the lower Chelan River, most of the mainstem spawning aggregations are simply derivatives of Wells-origin hatchery fish, not a discrete sub-population of natural-origin spawners.

1a) Indistinct Mainstem Sub-population Option; Use Wells Brood for a Segregated Program: An indistinct mainstem spawning aggregate is deemed by WDFW regional staff to be the most likely genetic analysis outcome. Wells Dam could continue to be used to collect brood for a segregated program with smolt releases at Wells Hatchery, Turtle Rock, and/or Chelan River. Wells Dam could also theoretically be used to remove un-harvested hatchery fish arrivals beyond broodstock needs, however the political feasibility of disposal of large numbers of Chinook has not been resolved. Although WDFW regional staff support this approach for indistinct mainstem summer Chinook, the transfer of all smolt production to sites below Wells Dam has not been vetted with the JFP or HCP Hatchery Committees.

1b) Distinct Mainstem Sub-population Option; Manage Wells Brood for an Integrated Program:

If a mainstem sub-population is verified, management of one or more integrated programs will be technically very challenging. No methods have been developed or proven to collect natural origin brood from mainstem areas, for example. There are no reliable data on NOS abundance in putative mainstem spawning areas, nor PNI values to define whether the population(s) is/are Primary or Contributing. However, WDFW regional staff supports collection of information on stock structure to help evaluate proposed or potential programs. For example, summer Chinook production at the proposed Chief Joseph Hatchery using Okanogan River stock could generate a significant straying problem into other mainstem spawning aggregates that may exist.

Initiation of an integrated program using brood collected at Wells and managing for a Primary or Contributing Population would require derivation of NOS and PNI statistics from mainstem spawning areas, assuming they could be delineated. Even if more accurate summer Chinook run size estimates could be made, it's doubtful that terminal fisheries could be designed that would be efficient at controlling PHOS. Further, protection of any mainstem spawning component would require more effective selective harvest in the mainstem Columbia River, limiting the contribution of hatchery fish to spawning areas, and more accurate and timely run prediction to make in-season adjustments.

2) Adult Collection at Chelan River Acclimation Site: The PUD-funded acclimation raceways proposed for the mainstem summer Chinook program at the lower Chelan River are at the 30% design stage. The current facility footprint and site constraints are not likely to allow adult collection, and that capability is not in the current HCP planning. However, a major capital outlay increase could potentially allow a re-design to allow adult collection.

The use of Chelan River water for acclimation makes high homing fidelity likely. A key uncertainty is the number of natural-origin spawners currently using the lower Chelan River. Standard gear harvests are unlikely to remove sufficient numbers of hatchery fish if PNI was a management objective in a spawning aggregate focused in or near the mouth of the Chelan River.

The on-going major habitat improvements in the lower Chelan River will likely increase spawning by summer Chinook of either origin. WDFW regional staff would support incorporation of adult collection capability and monitoring of straying if such changes were warranted based on GSI-type analysis, a new approach was approved by the JFP and HCP Hatchery Committees, and monitoring crew budgets were available.

3) Collect Brood Through Mid-October: Current inoculation procedures for BKD require two weeks pre-spawn inoculation; fish collected in mid-October are generally already ripe.

4) Fin-clip Entire Smolt Production: 100% marking is planned for the Chelan River program.

5) Implement Selective Fisheries: Standard gear harvests are unlikely to remove sufficient numbers of hatchery fish if PNI were an issue in one or more spawning aggregates in the mainstem above Rock Island Dam.

BKD Control: WDFW is in the process of revising its BKD control strategy allowance for culling at all stations where needed is a goal of that effort. WDFW regional staff agree with the HSRG judgments and recommendations regarding more effective culling and BKD control.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The no above for "meeting HSRG Standards" was entered as a default only. Comment was entered as N/A.

Additional comment to the No - "Have you developed an alternate plan"

The multiple technical challenges of the HSRG Recommendations have not been addressed; the primary need is verification that unique mainstem spawning aggregates even exist.

Other Comments

The principal management issues include definition of stock structure, and the feasibility of, or need for mainstem sub-population management. Obtaining information to answer this question should be the highest priority, and that approach is supported by WDFW regional staff.

Commenter Info

Commenter Name: Steven Hays

Commenter Email: steve.hays@chelanpud.org

Commenter Organization: Chelan County Public Utility District

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG

recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Tom Kahler

Commenter Email: Tkahler@dcpud.org

Commenter Organization: Douglas PUD

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Management objectives are poorly defined for Upper Middle Columbia Mainstem summer Chinook, and we are unaware of any consensus among the fisheries management agencies on those objectives. Douglas PUD cannot commit to implementation of the recommendations as presented without a clear understanding of the management objectives. Additionally, decisions on the management of the hatchery programs funded by Douglas PUD are made by unanimous consensus of the Wells Hydroelectric Project Habitat Conservation Plan (Wells HCP) Hatchery Committee, consisting of

representatives of each Party to the HCP, including the Colville Confederated Tribes, Douglas PUD, the National Marine Fisheries Service, Washington Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, and the Yakama Nation. Thus, unilateral commitment by Douglas PUD to management actions is inappropriate and untenable.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Minor comment: please note that contrary to the statement on Page 2, Section 2.2 (1), line 5, summer Chinook at Wells Hatchery are reared on a seasonally varying combination of ground water and river water.

5. Wenatchee Summer Chinook

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Yes - With Comment

1) Determine population structure: It would be very useful to learn whether summer Chinook in the Wenatchee basin are genetically distinct from others in the UCR. WDFW regional staff believes the recommended analyses should be run, if funding is available.

2) Remove excess hatchery fish: There currently is very limited infrastructure to extract hatchery-origin fish below Tumwater Dam, and essentially none below Dryden Dam. Most of the hatchery fish return to areas below the Tumwater Canyon, therefore removals would need to occur in the Wenatchee River mainstem. Although terminal fisheries occur, they are relatively inefficient at hatchery fish removal (especially in the mainstem

Columbia). Development of an acclimation or adult collection pond near Dryden Dam on a year-round water source other than Wenatchee River water would be an ideal solution to address adult removal/management. (“Bubble”) fisheries could focus on the Dryden Dam area and supplement fisheries elsewhere in the migratory pathway. The much smaller number of hatchery fish that reach Tumwater Dam can be removed at that location. Further, acclimation facilities on Icicle River could provide acclimation and homing fidelity to a distinct location in the Wenatchee River Basin that has minimal overlap with traditional summer Chinook spawning areas and could provide an option of adult management between Dryden and Tumwater dams. WDFW staff intends upon investigating the opportunity and feasibility of an acclimation pond on the Icicle River. In general, there is a need to validate current assumptions about hooking mortality on older, larger Chinook in the terminal areas and potential impacts to non-target ESA listed species. WDFW regional staff strongly supports the goal of more effective control for higher PNI and increased fishery opportunity (removal efficiencies).

3) Saprolegnia control: Saprolegnia is evident in some years at the Dryden Acclimation Pond and is treated in accordance with standard fish health protocols. Treatment regimes are under the direction of WDFW Fish Health staff.

4) BKD Control: WDFW is in the process of revising its BKD control strategy allowance for culling at all stations where needed is a goal of that effort. WDFW regional staff agree with the HSRG judgments and recommendations regarding more effective culling and BKD control.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Lacking funding and JFP/HCP agreement, the current alternative is management under the status quo since the current program is largely successful, and as the HSRG noted, is well within the guidelines for a Primary population.

Other Comments

Effective removal of excess hatchery fish also requires a robust and reliable method to estimate overall hatchery and natural origin run sizes IN-SEASON, or as the fish begin to arrive at Rock Island Dam. PIT tagging a suitably large portion of the hatchery smolt production may be one suitable tool. Aggressive PIT tagging of natural origin sub-yearling summer Chinook smolts would also add to the precision of projected natural origin returns and aid adult management decisions/strategies.

Commenter Info

Commenter Name: Steven Hays

Commenter Email: steve.hays@chelanpud.org

Commenter Organization: Chelan County Public Utility District

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Chelan County PUD hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

7. Lower Yakima Mainstem Fall Chinook

Commenter Info

Commenter Name: Dave Fast

Commenter Email: Fast@yakama.com
Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The Yakama Nation agrees with the HSRG recommendation and plans to implement them as facilities and methods of collecting broodstock in basin are developed. This recommendation is in agreement with our plans for this population.

Commenter Info

Commenter Name: John A. Easterbrooks
Commenter Email: eastejae@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Yes in part. Clearly, it is technically feasible to mass mark all hatchery releases to allow for broodstock management, NOS assessment, and increased terminal hatchery harvest utilizing a selective sport fishery to reduce pHOS and increase pNOS. However, improving NOB collection for a viable, integrated hatchery program is problematic because of spawning distribution and infrastructure constraints. Prosser Dam is the only location where fish can be trapped (Horn Rapids Dam is not an option), and the trapping facility at Prosser is less than ideal with few options for significant improvement. However, if hatchery fish were mass marked, adipose-intact NOB could be collected by other means (netting, gaffing, etc.) on the spawning grounds.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

These hatchery programs are not solely under WDFW jurisdiction. Elimination of the 1.7M LWS program would require approval of the U.S. v. OR parties who approved this “upstream re-programming” of John Day/The Dalles mitigation to put more URB’s in Zone 6 for treaty tribal harvest. The negative impact of this harvest enhancement/segregated program on the Yakima mainstem natural population is not a big concern for some U.S. v. OR parties. Consequently, the natural population is compromised (sacrificed) in the name of maintaining pre-terminal area harvest in the ocean and Columbia River.

The local “Yakima Program” is managed by the YKFP partners (BPA, Yakama Nation and WDFW). WDFW has more influence in guiding this program (fewer parties involved), but BPA and YN would have to agree to mass marking and the increased costs for NOB collection at locations other than Prosser Dam.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

2nd "No" is default entry only as nothing was entered.

Other Comments

1) The map is intended to show mainstem Yakima fall chinook natural production areas (which it does) and hatchery facilities that supplement natural production (which it does not). The map in each report should be customized for the respective population. This map fails to show the one hatchery that supports the mainstem fall chinook population, Prosser Hatchery. Most of the hatchery facilities that are depicted are not for fall chinook production and should be removed from the map to prevent confusion. These include: 1) all the sites in Kittitas Co. upstream of Roza Dam, 2) all the sites in the Naches Basin except Stiles Pond, which is used by the YN to acclimate/release coho and mainstem fall chinook, 3) the Yakima Hatchery no longer exists, delete, 4) the mainstem Columbia R. hatcheries should be removed, they do not produce fall chinook for the Yakima R.

8. Marion Drain Fall Chinook

Commenter Info

Commenter Name: Dave Fast

Commenter Email: Fast@Yakama.com

Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The YN is working on resolving the issues that have been identified in the HSRG observation and recommendations.

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

However, the “Recommendations” fail to specify that the Marion Drain integrated conservation program needs to mass-mark (adipose clip) all hatchery releases so that pNOB can be controlled/increased over time and pNOS can be assessed. Eventually, this could allow for the removal of excess hatchery fish to reduce pHOS in years with good NOR returns. Mass-marking the mainstem Yakima River hatchery fish would also allow mainstem strays to be excluded from broodstock collections.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

I can recommend that all hatchery fish be adipose-clipped as the WDFW policy representative to the YKFP. I cannot unilaterally make that decision, it also requires concurrence from the YN and BPA.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Both "No" are default entries only as none were checked.

Other Comments

1) See comment on mainstem Yakima fall chinook report comments regarding the map. Remove all hatchery facilities shown on this map, none of them are related to the Marion Drain fall chinook population. Instead, add the Marion Drain Hatchery facility to the map, it produces this hatchery program and is not shown.

10. Umatilla Fall Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

CTUIR does not agree with the PNI as presented and does not feel that there is scientific data to support the specific values for primary and contributing populations.

CTUIR feels that as long as hatchery fish are of the appropriate stock that they can make a valuable contribution in seeding underutilized habitat and should not be necessarily limited by a finite PNI or PHOS value.

The Umatilla natural population is not large enough to initiate this program at the recommended level.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

We are initiating a stepping stone program in 2008 with a conservation group of 240K 1+ and a harvest component of 240K 1+ and 600K 0-age.

The two groups will be differentially marked as recommended.

This program being implemented has been developed and agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Other Comments

In the future the intent would be to expand the conservation group program size up to the recommended level.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

There are not enough wild fish returning to the sub-basin to incorporate 100% for the stepping stone group.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Not as prescribed; we plan to implement a conservation group of 240,000 smolts with ~52% natural origin adults. Although the HSRG recommendation was 100%, the managers did not feel like there are enough returning adults for the full amount.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Other Comments

Major changes in this program will require US v Oregon policy agreement. The changes that were implemented incorporate some of the HSRG recommendations, but are subject to change with new John Day/The Dalles mitigation objectives.

3.1.7 Lower Snake River Fall Chinook ESU

1. Lower Snake River Fall Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Unsure on the live trapping of broodstock - I'm assuming the HSRG is also unsure of the technical feasibility based on their recommendation to "investigate" rather than "implement".

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Using directed fisheries to remove hatchery fish from ESA listed populations has take constraints which limit the effectiveness of this tool.

Disagree with managing this population as multiple subpopulations. All ESA information to date identifies this as a single population.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program being implemented has been developed and agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Other Comments

This is the only population I reviewed where HSRG cites a significant loss in harvest as a reason for not making recommendations on changing the hatchery program.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Funding does not exist for developing alternate sources of broodstock collection as recommended. The Nez Perce Tribe will attempt to construct a weir in the South Fork Clearwater in 2009 to collect adults as part of the Nez Perce Tribal Hatchery program for the upper Clearwater River.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

With regard to 100% ad clip recommendation - This recommendation is in direct disagreement with the court ordered U.S. vs. Oregon 2008-2017 Management Agreement. The co-managers have developed a comprehensive marking plan with scientific justification for Snake River fall Chinook which we intend to implement. The NPT does not agree with a mass-mark/selective fishery management approach. Take constraints on natural origin fish limit the effectiveness of this strategy to target hatchery-origin fish. In addition, there is a potential to inflict greater mortality on natural origin fish due to catch and release mortality (on multiple occasions) than would occur via an assumed risk of hatchery origin fish spawning naturally.

The co-managers have implemented an agreed to fish health program that has been very effective at controlling and reducing BKD. We intend to continue to support this approach.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers using best available science and information. It has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. It is currently providing a demographic survival advantage to the population. The supplementation program has been largely responsible for the increase in Snake River fall Chinook to the basin from <1,000 fish/year from 1975-1999 to >10,000 fish/year since 2001. Annually, since 2001, natural origin fish over Lower Granite Dam have numbered 3,000 fish or more. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions.

Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Other Comments

This population/program report contains inconsistencies and inaccuracies and the comment format does not support our editing.

These recommendations do not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Historically Hells Canyon Dam was not present and spawning occurred upstream to Shoshone Falls.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

What is the value of 1,9523 in Table 1?

Commenter Info

Commenter Name: Glen Mendel

Commenter Email: mendegwm@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above. Collecting hatchery broodstock by live capture fishing in the Clearwater and Snake River upstream of the Clearwater on a large enough scale, is logistically not readily feasible e.g. sorting fish captured by origin and also collecting fish through the run timing on two large river systems. Some testing could be conducted to evaluate this approach to brood stock collection. Additional funding would be needed to test this recommendation.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above. Per HSRG recommendation, WDFW is pursuing supportable harvest opportunities on hatchery fall Chinook in the Snake River via parameters set forth in the new 10-year U.S. vs Oregon Agreement for the Columbia River, and also via development and approval of a Fish Management and Evaluation Plan (FMEP) in consultation with NOAA Fish. Current juvenile fish rearing protocols for

LFH via facility co-manager approved Annual Operation Plans (AOP) call for conservative rearing densities and other fish culture procedures to promote fish health and minimize to the extent possible, BKD outbreaks.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Section 2.2 paragr. 5, this should be basically repeated for Captain John's and Pittsburg Landing sites, or something similar. Why report on only Big Canyon?

Map is incomplete - it should include down to Lower Monumental Dam, and include the Clearwater and Grande Ronde rivers.

Snake River Fall Chinook hatchery programs, utilizing an integrated approach, are being used for both mitigation and ESA recovery. Proposed HSRG recommendations do not appear to offer significant improvements to potential future fall Chinook returns or composition, but would increase program costs to implement. This plan could potentially compromise or at least complicate the calculation or run reconstruction and monitoring required for Columbia River and ocean management actions.

3.1.8.1 Upper Salmon River Chinook MPG

1. East Fork Salmon River Spring/Summer Chinook

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

2. Salmon Lemhi River Spring Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

In addition to monitoring the population, the co-managers have agreed to a review of options for initiating a Lemhi River spring Chinook supplementation program through the U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The Tribes reclassified this population as "large" (1000) because it does not function at a level relative to the ICTRT classification.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Under the SBT Fish Accord with BPA, the Lehmi River is identified for additional chinook salmon supplementation activities. Broodstock parameters will be managed for a primary population.

3. Lower Salmon Mainstem (~Below Redfish Lake) Spring Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

The "run-type" should be changed to "Spring/Summer" in the title of the pop. report. Right now, it is just "spring."

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The Tribes reclassified this population as "large" (1000) because it does not function at a level relative to the ICTRT classification.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

4. North Fork Salmon River Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River Chinook populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production and a DIDSON to determine adult returns and run-timing.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Pahsimeroi River Summer Chinook

Commenter Info

Commenter Name: Paul Abbott

Commenter Email: pabbott@idahopower.com

Commenter Organization: Idaho Power Company

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Idaho Power Company has no resource management authority and therefore declines to comment on whether or not the HSRG plan is technically feasible or should be implemented as proposed. Idaho Power Company will continue to provide fish hatchery facilities, adult trapping facilities, fish transportation equipment and operating funds necessary to meet fish production levels as required under current and future FERC operating licenses for the Hells Canyon Dam Complex. Idaho Power supports the Idaho Department of Fish and Game in their operation of these facilities and implementation of HSRG goals.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Idaho Power Company has no resource management authority and therefore declines to comment on whether or not the HSRG plan is technically feasible or should be implemented as proposed. Idaho Power Company will continue to provide fish hatchery facilities, adult trapping facilities, fish transportation equipment and operating funds necessary to meet fish production levels as required under current and future FERC operating licenses for the Hells Canyon Dam Complex. Idaho Power supports the Idaho Department of Fish and Game in their operation of these facilities and implementation of HSRG goals.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Idaho Power wishes to make the following clarification to the HSRG report and recommendations.

Section 2.2 Current Hatchery Programs Affecting this Population paragraph 1 reads; Following implementation of the Hells Canyon Settlement Agreement in 1980, the role of Pahsimeroi Fish Hatchery was expanded to include the production of one million summer Chinook salmon smolts annually.

Idaho Power wishes to point out that the 1980 Hells Canyon Settlement Agreement does not specify the production of summer chinook - it simply says Chinook. The decision to rear summer Chinook was made by IDFG.

Section 2.2 Current Hatchery Programs Affecting this Population the last sentence in paragraph 1 reads; The upper component is newly constructed and located approximately 11.3 kilometers further upstream from the lower facility on the Pahsimeroi River.

To accurately reflect that fact that the upper facility has been in place and operational since 1980, Idaho Power suggests this sentence be modified to state; The upper component is located approximately 11.3 kilometers further upstream from the lower facility on the Pahsimeroi River. This facility was completely renovated by Idaho Power in 2006-07 to reduce the impacts of whirling disease on hatchery reared fish.

Section 2.2 Current Hatchery Programs Affecting this Population paragraph 2 reads; The current program goal is to release approximately 1,000,000 yearling Chinook salmon smolts to the Pahsimeroi River immediately downstream of the lower facility.

This statement is incorrect. Idaho Power suggests this statement be modified as follows; The current program goal is to volitionally release 1,000,000 yearling Chinook salmon smolts to the Pahsimeroi River directly from the upper facility rearing ponds.

Section 2.2 Current Hatchery Programs Affecting this Population paragraph 2 reads; Due to the presence of whirling disease in the Pahsimeroi River and the higher incidence of infection in juvenile fish at early life stages, early rearing of Pahsimeroi summer Chinook salmon occurs at IDFG's Sawtooth Fish Hatchery. In 1991, IDFG began shipping a portion of summer Chinook salmon eyed-eggs produced at Pahsimeroi to the Sawtooth Fish Hatchery to compare whirling disease infection rates between the hatcheries. These studies continued until 1996, when IDFG began shipping all Pahsimeroi summer Chinook salmon eyed-eggs to Sawtooth for incubation and early rearing. At eye-up, eggs are transferred to Sawtooth for hatching and early rearing on pathogen-free well water. Pahsimeroi Fish Hatchery summer Chinook are reared on well water at Sawtooth until they reach a minimum size of 70 mm before transferring them back to Pahsimeroi for final rearing. Beginning with brood year 2007 incubation and rearing of all Pahsimeroi Hatchery summer Chinook was to occur on station in new facilities constructed by IPC at the upper hatchery site.

Idaho Power suggests the following modifications to this paragraph to accurately describe the past and current incubation and rearing programs: Due to the presence of whirling disease in the Pahsimeroi River and the higher incidence of infection in juvenile fish at early life stages, early rearing of Pahsimeroi summer Chinook salmon has occurred at IDFG's Sawtooth Fish Hatchery. In 1991, IDFG began shipping a portion of summer Chinook salmon eyed-eggs produced at Pahsimeroi to the Sawtooth Fish Hatchery to compare whirling disease infection rates between the hatcheries. These studies continued until 1996, when IDFG began shipping all Pahsimeroi summer Chinook salmon eyed-eggs to Sawtooth for incubation and early rearing. At eye-up, eggs were transferred to Sawtooth for hatching and early rearing on pathogen-free well water. Pahsimeroi Fish Hatchery summer Chinook were reared on well water at Sawtooth until they reach a minimum size of 70 mm (or until such time that well water became unavailable, whichever occurred first) before transferring them back to Pahsimeroi for final rearing. Beginning with brood year 2008 incubation and rearing of all Pahsimeroi Hatchery summer Chinook will occur on station in new facilities constructed by IPC at the upper hatchery site.

Section 3.2 HSRG Observations/Recommendations

Idaho Power suggests that the HSRG clarify its two-stage stepping stone program to support the natural population and to provide harvest. In this discussion the HSRG refers to a integrated conservation component consisting of approximately 285,000 smolts. It is unclear whether this component is to be produced within, or in addition to, the existing 1 million smolt mitigation goal. Idaho Power suggests that the HSRG clearly state that this integrated conservation component of the hatchery program falls within the current smolt production goal and is not intended to increase the number of smolts produced from this hatchery mitigation program.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

IDFG would need to determine if operating an integrated and segregated program at the Pahsimeroi Hatchery is technically feasible, i.e., can natural origin broodstock and hatchery origin broodstock be spawned separately and does sufficient segregation capacity exist at Pahsimeroi Hatchery to keep an integrated and segregated program separate until marking, etc.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The current program has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. However, as part of the U.S. vs. Oregon Agreement, the co-managers have committed to "utilize ISS and other supplementation information to develop an integrated broodstock management guideline to reimplement supplementation for Pahsimeroi and McCall Hatcheries. Planning will occur in 2008 with broodstock management protocols to be implemented with BY09." The NPT will consider the HSRG recommendations in developing program modifications with our co-managers. Changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

As specified above, the NPT will consider the HSRG recommendations in conjunction with our co-managers, as we develop an integrated supplementation program for the South Fork Salmon summer Chinook program. This integrated program may or may not meet HSRG standards. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number or a pHOS value. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Other Comments

The HSRG estimates of the number of fish "straying" into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

The Tribes support the development of an integrated salmon supplementation program instead of segregated or stepping stoned. An alternate to erythromycin treatment needs to be investigated as Tribal members fish above the weir and are, therefore, suseptible to ingestion of the drug.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

6. Salmon Panther Creek Spring Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Panther Creek has been identified as a potentially suitable location for a future spring Chinook salmon reintroduction program.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The HSRG has no recommendation for this population

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The Tribes classify the minimum threshold at 500 adults (Basic) as this would seem the most reasonable (common sense) to attain recovery of an "extripated" population.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

There are no recommendations presented. However, the Tribes recommend utilizing a screw trap in Panther Creek to determine if chinook salmon are truly extripated and monitor steelhead and bull trout.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Under the SBT Fish Accord with BPA, Panther Creek is identified for re-introduction of chinook salmon. This program will be managed as a locally adapted broodstock, attaining initial broodstock to the closely related South Fork Salmon River population. Floating (average) PNI, pNOB, and pHOS parameters will be managed for a primary population.

7. Salmon River Above Redfish Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

IDFG would need to determine if operating an integrated and segregated program at Sawtooth Hatchery is technically feasible, i.e., can natural origin broodstock and hatchery origin broodstock be spawned separately and does sufficient segregation capacity exist at Sawtooth Hatchery to keep an integrated and segregated program separate until marking, etc.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The current program has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. However, as part of the U.S. vs. Oregon Agreement, the co-managers have committed to "utilize ISS and other supplementation information to develop an integrated broodstock management guideline to reimplement supplementation for Sawtooth hatchery. Planning will occur in 2008 with broodstock management protocols to be implemented with BY09." The NPT will consider the HSRG recommendations in developing program modifications with our co-managers. Changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

As specified above, the NPT will consider the HSRG recommendations in conjunction with our co-managers, as we develop an integrated supplementation program for the Upper Salmon spring Chinook program. This integrated program may or may not meet HSRG standards. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number

or a pHOS value. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Other Comments

Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. This recommendation does not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy
Commenter Email: ktardy@shoshonebannocktribes.com
Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

The Tribes support the development and implementation of an integrated salmon supplementation program at SFH. An alternate to erythromycin treatment needs to be investigated as Tribal members fish above the weir and are, therefore, susceptible to ingestion of the drug.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Who is referenced in the comment "provide relatively small harvest benefits?"

8. Salmon - Valley Creek Spring Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect data on status and trends of Snake River spring Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Monitoring and evaluation work in Valley Creek would be performed by the Shoshone Bannock Tribe or Idaho Department of Fish and Game

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds).

However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

9. Salmon - Yankee Fork Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The supplementation program for Yankee Fork will be developed by the appropriate U.S. vs. Oregon co-managers. The NPT will consider the HSRG recommendations in developing program modifications with our co-managers. Changes to this production

program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that

address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Tribes classify the Yankee Fork as a Spring and Summer population. Most recent Yankee Fork release occurred in 2006 from the release of 135,934 smolts. Redd counts from 1986 - 2005 averaged 37 redds; 0 in 1995 and 130 in 2002(includes 33 captive). Average adult escapement from 86-05 equals 92 adults. Trapping for the Yankee Fork Chinook Salmon Supplementation program was initiated in 2008.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

The Tribes have completed the Yankee Fork HGMP (including sliding scale for integrated broodstock and escapement) and are awaiting consultation with IDFG and NOAA Fisheries.

The Columbia Basin Fish Accord with the Shoshone-Bannock Tribes identifies the construction of an adult trapping facility in the Yankee Fork and a hatchery at Crystal Springs to promote development of localized broodstock (primary population) and provide acclimation for juveniles and adult holding and spawning. Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production out of Yankee Fork.

3.1.8.2 Middle Fork Salmon River Chinook MPG

1. Salmon - Bear Valley Creek Spring Chinook

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production and a DIDSON to determine adult returns and run-timing.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The Tribes visually identified a hatchery-origin fish in Bear Valley, but could not locate carcass after spawning season.

2. Salmon Big Creek Spring/Summer Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: bekyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

If no HOR adults have been collected in carcass surveys, how can four strays be estimated in the population?

IDFG operates a screw trap in Big Creek which is not listed in the text.

3. Salmon-Camas Creek Spring Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have

not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The most recent 10-yr geomean is 28 (NOAA Fisheries SCA 8.3-50).

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production and a DIDSON to determine adult returns and run-timing.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Page 3. Remove the word incidental from "incidental harvest contribution" as it is not used in other populations and the Tribes harvest (not incidentally) under a conservation based management plan.

4. Salmon Chamberlain Creek Spring Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: bekyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The NOAA Fisheries Supplemental Comprehensive Analysis does not list a 10-yr geomean value.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Salmon - Loon Creek Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

The tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production and a DIDSON to determine adult returns and run-timing.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

6. Salmon - Marsh Creek Spring Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy
Commenter Email: ktardy@shoshonebannocktribes.com
Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Other factors including dam construction and down river fisheries have also reduced abundance in Marsh Creek, not just past land use activities. The most recent 10-yr geometric mean is 42 (NOAA Fisheries SCA 8.3-50).

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

In addition, as part of the ISS program through 2012, IDFG operates a screw trap on Marsh Creek.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

7. Middle Fork Salmon Lower Mainstem Spring/Summer Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy
Commenter Email: ktardy@shoshonebannocktribes.com
Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

8. Middle Fork Salmon Upper Mainstem Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

9. Salmon - Sulphur Creek Spring Chinook**Commenter Info**

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to monitor status and trend information for Snake River spring/summer Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River Chinook populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.1.8.3 South Fork Salmon River Chinook MPG

1. East Fork-South Fork Salmon River Johnson Creek Summer Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

There are no specific recommendations presented and the Nez Perce Tribe effectively manages the Johnson Creek program within Primary population levels.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

2. Little Salmon River Spring/Summer Chinook

Commenter Info

Commenter Name: Paul Abbott

Commenter Email: pabbott@idahopower.com

Commenter Organization: Idaho Power Company

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Idaho Power Company has no resource management authority and therefore declines to comment on whether or not the HSRG plan is technically feasible or should be implemented as proposed. Idaho Power Company will continue to provide fish hatchery facilities, adult trapping facilities, fish transportation equipment and operating funds necessary to meet fish production levels as required under current and future FERC operating licenses for the Hells Canyon Dam Complex. Idaho Power supports the Idaho Department of Fish and Game in their operation of these facilities and implementation of HSRG goals.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Idaho Power Company has no resource management authority and therefore declines to comment on whether or not the HSRG plan is technically feasible or should be implemented as proposed. Idaho Power Company will continue to provide fish hatchery facilities, adult trapping facilities, fish transportation equipment and operating funds

necessary to meet fish production levels as required under current and future FERC operating licenses for the Hells Canyon Dam Complex. Idaho Power supports the Idaho Department of Fish and Game in their operation of these facilities and implementation of HSRG goals.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Idaho Power wishes to make the following clarifications to the HSRG report and recommendations.

Section 2.2 Current Hatchery Programs Affecting this Population last sentence in paragraph 1 reads; An adult trap, located 2.4 kilometers downstream of the main hatchery, is used for trapping hatchery spring Chinook salmon and monitoring wild steelhead, hatchery steelhead strays, wild spring Chinook salmon and bull.

Idaho Power suggests this statement be modified to state; An adult trap, located 2.4 kilometers downstream of the main hatchery, is used for trapping hatchery spring Chinook salmon and monitoring wild steelhead, hatchery steelhead strays, wild spring/summer Chinook salmon and bull trout.

Section 2.2 Current Hatchery Programs Affecting this Population paragraph 3 reads; The current production plan is to release approximately 3 million yearling Chinook salmon smolts annually (2.3 million to Rapid River, approximately 200,000 to the Little Salmon River, and approximately 500,000 to the Snake River downstream of Hells Canyon Dam).

Idaho Power wishes to point out that the smolt distribution plan referenced here differs from that spelled out in Idaho Power's mitigation plan (The 1980 Hells Canyon Settlement Agreement) wherein 2 million smolts are to be released in Rapid River and 1 million smolts are to be released in the Snake River downstream of the Hells Canyon Dam. We suggest that the HSRG clarify the purpose of releasing 200,000 smolts in the Little Salmon River and the parties responsible for this decision. Idaho Power suggests that the statement be modified to read; IDFG's current production plan, in cooperation with the Nez Perce Tribe, is to release approximately 3 million yearling Chinook salmon smolts annually (2.3 million to Rapid River, approximately 200,000 to the Little Salmon River, and approximately 500,000 to the Snake River downstream of Hells Canyon Dam).

Section 3.2 HSRG Observations/Recommendations paragraph 2 in the yellow box reads; The current Idaho Power Company mitigation target for the program is 3.0 million yearling smolts for release to Rapid River (2.5 million), the Little Salmon River (~200,000), and the Snake River downstream of Hells Canyon Dam (~500,000).

Idaho Power suggests this sentence be modified to state; The current Idaho Power Company mitigation target for the program is 3.0 million yearling smolts. IDFG and the Nez Perce Tribe have agreed to a release strategy of to 2.3 million smolts to Rapid River, ~200,000 to the Little Salmon River, and ~500,000 to the Snake River downstream of Hells Canyon Dam.

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT supports outplanting carcasses for nutrient enhancement.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Actual implementation of carcass outplants will depend on fish health review, testing, and support.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Oregon would recommend segregating the Snake River portion of the program away from the Little Salmon/Rapid River efforts. The program would consist of 750,000 smolts for harvest mitigation and up to 250,000 for experimental restoration efforts above the Hells Canyon Dam. A total of 1.0 million for the Snake River. This restoration group would focus primarily on Pine Creek, and if successful, in the Eagle Creek tributaries.

Other Comments

ODFW contends the Rapid River stock is a conglomerate stock of multiple Snake River tributaries above Hells Canyon Dam. During the construction of the IPC Hells Canyon complex of dams, Pine Creek was the most viable population of the conglomerate stocks. ODFW recommends that this stock be used for reintroduction efforts in tributaries above Hells Canyon Dam, specially two Oregon tributaries Pine and Eagle creeks

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The Tribes support the implementation of the recommendations presented, but will not be a huge supporting player in completing the necessary objectives.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Page 5. Smolt release at Rapid River is 2.3 not 2.5 million.

3. Salmon - Secesh River Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Currently, the Nez Perce Tribe operates 2 screw traps, DIDSON, and Underwater videography in the Secesh population and controls monitor and evaluation activities. The Tribes will continue to monitor harvest on a yearly basis.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

4. Salmon South Fork Summer Chinook

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

IDFG would need to determine if operating an integrated and segregated program at the South Fork satellite and McCall Hatchery is technically feasible, i.e., can natural origin broodstock and hatchery origin broodstock be spawned separately and does sufficient segregation capacity exist at McCall Hatchery to keep an integrated and segregated program separate until marking, etc.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The current program has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. However, as part of the U.S. vs. Oregon

Agreement, the co-managers have committed to "utilize ISS and other supplementation information to develop an integrated broodstock management guideline to reimplement supplementation for Pahsimeroi and McCall Hatcheries. Planning will occur in 2008 with broodstock management protocols to be implemented with BY09." The NPT will consider the HSRG recommendations in developing program modifications with our co-managers. Changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

As specified above, the NPT will consider the HSRG recommendations in conjunction with our co-managers, as we develop an integrated supplementation program for the South Fork Salmon summer Chinook program. This integrated program may or may not meet HSRG standards.

The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number or a pHOS value. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Other Comments

The HSRG estimates of the number of fish "straying" into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. This recommendation does not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The most recent 10-yr geomean is 653 (NOAA Fisheries SCA 8.3-50).

The Tribes are incubating hatchery-origin eyed eggs (~300,000) in Dollar Creek, a tributary to the South Fork Salmon River.

An alternate to erythromycin treatment needs to be investigated as Tribal members fish above the weir and are, therefore, susceptible to ingestion of the drug.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

However, will unharvested "harvest component" fish be recycled through the fishery? What is the appropriate level of stream nutrification? If the stepping stone program is managed improperly excess fish may be land-filled in which the Tribes would strongly disagree with.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.1.8.4 Grande Ronde-Imnaha Chinook MPG

1. Grande Ronde-Catherine Creek Spring Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

CTUIR does not agree with the PNI as presented and does not feel that there is scientific data to support the specific values for primary and contributing populations.

CTUIR feels that as long as hatchery fish are of the appropriate stock that they can make a valuable contribution in seeding underutilized habitat and should not be necessarily limited by a finite PNI or PHOS value.

Using directed fisheries to remove hatchery fish from ESA listed populations has take constraints which limit the effectiveness of this tool.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program being implemented has been developed and agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

It incorporates an adult sliding scale for % of hatchery fish allowed to escape above the weir at varying run sizes.

Other Comments

Agree with recommendation to look at increased size at release.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Yes on numbers, but not on release size. Model suggests surplus hatchery fish even at the lower production levels. Increasing smolt size would potentially produce more surplus hatchery adults plus increase the risks of earlier maturation as well as other unintended results.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Unknown due to US v Oregon and past co-management agreements

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

2. Grande Ronde-Imnaha Spring Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement which includes increasing production up to 490K smolts when production space becomes available.

CTUIR does not agree with the PNI as presented and does not feel that there is scientific data to support the specific values for primary and contributing populations.

While CTUIR views the stepping stone program recommendation favorably, it disagrees with the removal of surplus hatchery adults. CTUIR feels that as long as hatchery fish are of the appropriate stock that they can make a valuable contribution in seeding underutilized habitat and should not be necessarily limited by a finite PNI or PHOS value.

Using directed fisheries to remove hatchery fish from ESA listed populations has take constraints which limit the effectiveness of this tool.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program being implemented has been developed and agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Other Comments

Agree whole heartedly with the recommendation to replace/improve the Innaha weir. There are no recommendations by the HSRG on the Big Sheep Ck component of the program.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Developing two production groups within this program would require much discussion and coordination between the co-managers and would be technically challenging.

The NPT supports replacement of the Imnaha River weir through the Northeast Oregon Hatchery project.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

This recommendation is in direct disagreement with the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT will consider the HSRG recommendations in coordination with our co-managers. However, changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The co-managers have developed and are implementing a sliding scale to manage broodstock composition in the hatchery and on the spawning grounds. This sliding scale manages demographic risk with potential genetic risk of hatchery supplementation. The current program was developed in coordination with our co-managers using best available science and information. It has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. It has been effective at providing a demographic survival advantage to the population (i.e., preventing extirpation). The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin

fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number or a pHOS value.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. This recommendation does not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Unknown due to US v Oregon and past co-management agreements

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

The LSRCP mitigation for the Imnaha Basin is 490,000 smolts; however, the HSRG has modeled the program at 360,000 smolts to meet their objectives. The alternative recommendation would be to reallocate the 130,000 smolts or a portion of them to Lookingglass Creek for harvest mitigation

3. Grande Ronde-Lookingglass Creek Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The current program was developed in coordination with our co-managers using best available science and information. It has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The NPT will consider the HSRG recommendations in coordination with our co-managers. However, changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that

exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

While CTUIR would be open to increasing the program size in Lookingglass Ck, it is based on the premise that the Catherine Ck program would be reduced which CTUIR is in disagreement with.

CTUIR does not agree with the PNI as presented and does not feel that there is scientific data to support the specific values for primary and contributing populations.

CTUIR feels that as long as hatchery fish are of the appropriate stock that they can make a valuable contribution in seeding underutilized habitat and should not be necessarily limited by a finite PNI or PHOS value.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program being implemented has been developed and agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Other Comments

HSRG acknowledges the uncertainty of habitat potential values for Lookingglass Ck. CTUIR disagrees with the capacity estimates used in the modeling by HSRG and provided them with additional information.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Increasing the release number of smolts will help achieve our mitigation responsibilities; however, we would support reallocation of 205,000 smolts - 130,000 Imnaha smolts and 75,000 Catherine Creek, for a total release of 455,000 smolts

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Unknown due to US v Oregon and past co-management agreements

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

ODFW would support utilizing Lookingglass Creek below the hatchery for a stronger portion of harvest mitigation and restoring a wild/naturalized contributing population above the hatchery.

4. Grande Ronde-Wallowa Lostine River Spring Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Not sure of the feasibility of improving weir efficiency to 90%+ at the current location or the funding availability to do it.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

CTUIR does not agree with the PNI as presented and does not feel that there is scientific data to support the specific values for primary and contributing populations.

CTUIR feels that as long as hatchery fish are of the appropriate stock that they can make a valuable contribution in seeding underutilized habitat and should not be necessarily limited by a finite PNI or PHOS value.

Using directed fisheries to remove hatchery fish from ESA listed populations has take constraints which limit the effectiveness of this tool.

In addition, disagree that this population should be managed as multiple subpopulations. All ESA information to date recognizes this as a single population unit.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program being implemented has been developed and agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Other Comments

Where is the data to support that only 50% of the NOS for this population are accounted for in the Lostine River?

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Empirical PNI data from the Lostine River population has ranged from 0.47 to 1.0 and averaged 0.74 for the past ten years. Empirical data from the Lostine/Wallowa River population has ranged from 0.49 to 1.0 and averaged 0.75 for the past ten years. HSRG recommendations do not improve upon the current program.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See above and alternate plan.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The co-managers have developed and are implementing a sliding scale to manage broodstock composition in the hatchery and on the spawning grounds. This sliding scale manages demographic risk with potential genetic risk of hatchery supplementation. The

current program was developed in coordination with our co-managers using best available science and information. It has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. It has been effective at providing a demographic survival advantage to the population (i.e., preventing extirpation). The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number or a pHOS value.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. This population/program report contains inconsistencies and inaccuracies and the comment format does not support our editing.

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Although many of the principles are being implemented, the higher PNI, selective fisheries, and removing hatchery adults from selected spawning areas are not supported by co-managers. Changes of this magnitude would be predicated on US v Oregon Policy support.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Grande Ronde-Minam River Spring Chinook**Commenter Info**

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Have concern with the assumption made in the Observations regarding implementation of HSRG recommendations for other programs in the Grande Ronde Basin.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to continue collection of status and trends information for Snake River Chinook.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

ODFW would support population classification of Primary and reduce program size. Our recommendation would be 65,000 smolts, primarily for operational reasons and existing infrastructure.

6. Upper Grande Ronde Spring Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Generally yes - with the one possible exception of holding prespawm adults at the acclimation facility. Not sure the water volume or quality is sufficient. The acclimation facility can already handle the full program in 2 rotations.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Generally yes - if the statement "continue to operate as a safety net until habitat is improved to a point where it can support a natural population" means continuation of the existing program.

Agree with the need to evaluate larger release size.

Need clarification on the prespawm holding and injection suggestions - is there prespawming mortality loss data that would support the need to do this or are they just very conservative precautions?

There needs to be some clarification of the broodstock recommendation during low run years.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@ state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Yes on numbers, no on fish marking.

Model suggest that stabilizing the Upper Grande Ronde stock will not be dependent on threshold of returning adults, but a stable return of hundreds of adults. Therefore, we believe an interim marking plan which incorporates the safety net production and longer term plans with an escapement level sliding scale to determine marking levels is a better approach. The plan is described below.

1. Interim marking scale for the Upper Grande Ronde Upper Grande Ronde (through BY 2012)

Conventional CWT only

Captive Brood ADCWT

If all production is from conventional brood mark 50% with AD and represented CWT group

2. Longer term - Upper Grande Ronde sliding scale for adult escapement and fish marking:

If adult escapement is <300 - follow interim marking strategy, and use captive brood safety net production.

If adult escapement is 300-750 - first 125,000 are CWT only, balance are Ad with represented 60,000 CWT.

If adult escapement is 751-1500 - first 62,500 are CWT only, balance are Ad with represented 62,500 CWT.

If adult escapement is >1500 - 100% Ad with represented 62,500 CWT

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Although many of the principles will are currently being implemented including the alternative marking plan which has been agreed to in US v Oregon and past Co-management agreements

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

ODFW would support population classification of Primary and reduce program size. Our recommendation would be 65,000 smolts, primarily for operational reasons and existing infrastructure.

8. Grande Ronde- Wenaha Spring Chinook

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Have concern with the assumption made in the Observations regarding implementation of HSRG recommendations for other programs in the Grande Ronde Basin.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

ODFW would support population classification of Primary and reduce program size. Our recommendation would be 65,000 smolts, primarily for operational reasons and existing infrastructure.

Commenter Info

Commenter Name: Glen Mendel

Commenter Email: mendegwm@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above. The HSRG recommendation is to accurately and precisely monitor status and trend information, as well as the proportion of hatchery fish. This is not currently practical in a remote wilderness area, as funding to accomplish this work is not currently available. Opportunities to secure funding to support enhanced monitoring efforts will be pursued.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.1.8.5 Tucannon-Asotin Chinook MPG

1. Asotin Creek Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Glen Mendel
Commenter Email: mendegwm@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above.

No specific recommendations from HSRG provided.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

No recommendations from HSRG

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

NOTE: "No" above was N/A.

Alternative Plan Approach

Genetically characterize the few returning spring chinook and determine if they are Hatchery strays from the Tucannon River or elsewhere. This is critical to know whether the Asotin population is extinct or whether reintroduction efforts should begin for ESA recovery or solely of harvest mitigation.

Other Comments

1. map - no spawning or rearing occurs in George Creek.
2. A high percentage of the hatchery strays in Asotin Creek are from the Tucannon River and HSRG did not suggest any solutions for this straying that may be a hydro effect.

2. Tucannon River Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The current program is providing a demographic survival advantage to the population (i.e., preventing extirpation). There is very little technical detail in the HSRG recommendations other than changing broodstock management and reducing production.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternate plan.

The co-managers have implemented an agreed to fish health program that has been very effective at controlling and reducing BKD. We intend to continue to support this approach.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers using best available science and information. It is currently providing a demographic survival advantage to the population (i.e., preventing extirpation). It has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number or a pHOS value.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM

is not aware of any scientific information that exists to support the HSRG designations. This recommendation does not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

CTUIR does not agree with the PNI as presented and does not feel that there is scientific data to support the specific values for primary and contributing populations.

CTUIR feels that as long as hatchery fish are of the appropriate stock that they can make a valuable contribution in seeding underutilized habitat and should not be necessarily limited by a finite PNI or PHOS value.

Using directed fisheries to remove hatchery fish from ESA listed populations has take constraints which limit the effectiveness of this tool.

The HSRG recommendation appears to provide no increase in productivity and lower #s of NOS.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program being implemented has been developed and agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Other Comments

Is there any scientific basis on why HSRG has proposed a "sliding scale" for broodstock/escapement management for this population and not recommended it for other populations in the same or worse condition?

Commenter Info

Commenter Name: Glen Mendel

Commenter Email: mendegwm@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Comments added to "Yes" above.

"Yes - in Part." Reducing the hatchery program in the Tucannon River may potentially meet genetic goals as identified in the HSRG recommendations, but may further threaten population abundance/demographics because spring Chinook that spawn in the Tucannon do not replace themselves in terms of R/S values. Hatchery genetic concerns are somewhat reduced with this population at this time because the low functional population size and productivity are pressing and immediate concerns. There is currently no evidence of any hatchery genetic effects with this population.

Fish resource co-managers (NPT and WDFW) have been working to develop a spring Chinook harvest management plan for the Tucannon. Further discussion on development of this plan will include the HSRG recommendation to selectively harvest hatchery fish returning to the Tucannon River. However, demographics and adult returns are of paramount importance to this population.

The LSRCP hatchery program (including Lyons Ferry Hatchery complex) will go through a USFWS hatchery review in early 2009. HSRG recommendations will be considered further during that process.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Survival, demographics and adult returns are of paramount importance to this population. In an effort to increase adult returns WDFW is making two changes in this program. WDFW is now testing the release of larger sized smolts to try and improve survival and returns.

WDFW plans to increase monitoring of Tucannon spring chinook which by-pass the Tucannon River to try and understand the reasons and possible solutions for this behavior. This monitoring will utilize PIT tags and detections at up river dams on the Snake River and within the Tucannon.

Other Comments

The map is inaccurate. Spawning does not occur in the lower half of the Tucannon River and only two dams exist.

Replace Table 1 with current AHA model results - numbers don't match.

Juvenile size at release: The two size groups (15 fpp & 9 fpp) are difficult to keep separate since they are reared in the same environment once transferred to Curl Lake on the Tucannon River for acclimation. Without good separation, the study might not provide enough information. Smolting activity is sporadic from year to year. Approx. twice out of the last 8 years fish have shown smolting activity and are ready to migrate. The other years, fish are resistant to release. Water temperatures may be contributing to this behavior as annual temperature fluctuations can occur (high 30s to mid 40s) during acclimation. (J. Lovrak).

The HSRG document repeatedly mentions limited habitat capacity and productivity in the Tucannon River that make identified conservation goals unachievable. In reality the habitat in the Tucannon River has dramatically improved since the early 1980s, yet the spring Chinook returns are on a chronic decline. There does not appear to be any direct correlation between Tucannon Basin habitat conditions and adult spring Chinook returns. The HSRG process seems to minimize to some extent out of basin impacts such as hydroelectric dams and reservoirs. WDFW has now identified that a significant proportion of returning spring Chinook bypass the Tucannon River and migrate over Lower Granite Dam. This is not likely caused by hatchery influence. A far more immediate and serious threat to this population than hatchery genetic effects appear to be overall low adult return numbers. No hatchery genetic effect has been documented in the

Tucannon spring Chinook population after much monitoring and evaluation of genetics of the population.

3.1.8.6 Clearwater River Chinook MPG

1. Lochsa River Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Although the NPT DFRM agrees that the preference is to fill broodstock requirements with adult returns to the Powell facility, some years adult returns will be insufficient to meet broodstock needs. During those years we support backfilling with broodstock from agreed-to sources to meet production program objectives. The co-managers of the four Clearwater River hatcheries are working to determine how these facilities can work together to maximize survival and program effectiveness.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See the alternate plan.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers and has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT will consider the HSRG recommendations in coordination with our co-managers. However, changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind

PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. This population is not listed under the Endangered Species Act.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. This recommendation does not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

2. Lolo Creek Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The Nez Perce Tribal Hatchery study design and facilities were developed to test the supplementation strategy for spring Chinook pre-smolt releases. In January 2009 the NPT will be holding a supplementation symposium to review the first five years of juvenile releases, juvenile performance and adult returns.

The co-managers of the four Clearwater River hatcheries are working together to determine how these facilities can work together to maximize survival and program effectiveness.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternate plan description.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. In addition, the Nez Perce Tribe has an Memorandum of Agreement with Bonneville Power Administration, who funds the O&M and M&E which outlines the production program for NPTH. HSRG recommendations would require a reworking of the NPTH study design and MOA and changes to this production program must occur through the U.S. vs. Oregon forum as

specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT will consider the HSRG recommendations and results from our monitoring and evaluation program in coordination with our co-managers. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

3. Lower Clearwater River Tributaries Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The NPT supports these HSRG recommendations. The co-managers of the four Clearwater River hatcheries are working together to determine how these facilities can work together to maximize survival and program effectiveness. However, changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. In addition, legal authorization and funding issues must be addressed before changes in production programs can be made.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Adam Izbicki

Commenter Email: Adam_Izbicki@fws.gov

Commenter Organization: USFWS

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Releases at Kooskia are not volitional. They are forced with crowders directly into the hatchery drain system emptying into Clear Creek.

5. South Fork Clearwater River Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The Nez Perce Tribal Hatchery study design and facilities were developed to test the supplementation strategy for spring Chinook pre-smolt releases. In January 2009 the NPT will be holding a supplementation symposium to review the first five years of juvenile releases, juvenile performance and adult returns. The co-managers of the four Clearwater River hatcheries are working to determine how these facilities can work together to maximize survival and program effectiveness.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternate plan.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. In addition, the Nez Perce Tribe has an Memorandum of Agreement with Bonneville Power Administration, who funds the O&M and M&E which outlines the production program for NPTH. HSRG recommendations would require a reworking of the NPTH study design and MOA and changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT will consider the HSRG recommendations and results from our monitoring and evaluation program in coordination with our co-managers. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. These populations of spring Chinook are not listed under the Endangered Species Act.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

6. Upper Selway River Spring Chinook

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Although we agree with the recommendation there are logistical and technical constraints that would make it difficult or impossible to implement. Space and water constraints at Clearwater Hatchery restrict our ability to produce spring Chinook smolts for this program. In addition, transportation and release of smolts would be logistically challenging. In order to outplant in the upper Selway we have to travel through Montana over several mountain passes. Accomplishing this with smolts (would require several trips) in the spring (access restrictions due to snow) would be very challenging.

The feasibility of collecting adults without a weir is also questionable. If the SAR of 100,000 smolts is .4% approximately 400 adults would return. Approximately 100 adults would be required for broodstock. To collect 1/4 of the return with dipnets or other non lethal means and set up a holding and transportation program would be costly, challenging, and may not be very effective.

The co-managers of the four Clearwater River hatcheries are working together to determine how these facilities can work together to maximize survival and program effectiveness.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

This recommendation is in direct disagreement with the court ordered U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers and has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT will consider the HSRG recommendations in coordination with our co-managers. However, changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. This population of spring Chinook is not listed under ESA.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. This recommendation does not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

3.2 COHO

3.2.1 Lower Columbia River Coho ESU

2. Columbia Estuary - Big Creek Coho

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3. Chinook River Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Columbia Estuary - Deep River Net Pen Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternative below.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

A new program consisting of 750,000 Type-S coho will be brought in from Grays River and Washougal Hatcheries. Lewis River will be the primary stock used for this program. The new lower Grays River Weir and the high harvest rate associated with Deep River Net Pens will combine to remove stray Type-S coho from entering the Grays River. We believe this combination will allow the Grays River coho population to meet the standards of a Primary population.

6. Elochoman River Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

WDFW has chosen to close Elochoman Hatchery.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

8. Grays River Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW will still continue to use Grays River hatchery as a rearing site for the Deep River net Pens. WDFW will utilize the weir in the lower River to remove Type-S coho strays. Funding is being requested to address the hatchery intake and adult collection abilities.

9. Mill, Abernathy and Germany Creeks Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

14. Hood River Coho

Commenter Info

Commenter Name: Chris Brun

Commenter Email: cbrun@hrecn.net

Commenter Organization: CTWSRO

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

15. Klickitat River Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

20. Bonneville Hatchery Coho

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

21. Coweeman River Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

22. Cowlitz River Coho

Commenter Info

Commenter Name: Mark LaRiviere

Commenter Email: mglarivie@cityoftacoma.org

Commenter Organization: Tacoma Power

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Cowlitz River coho. An edit on page 2 is proposed to change the sentence in Section 1 to read: All naturally produced, unmarked fish collected at the Cowlitz Salmon Hatchery trap are passed upstream of Mayfield Dam along with surplus hatchery fish to spawn naturally. An edit on page 3 is proposed to change the references to the Cowlitz Fish Hatchery or the Cowlitz River Fish Hatchery to the Cowlitz Salmon Hatchery.

Under Section 2.2, Current Hatchery Programs Affecting these Populations we recommend using the current (2008 Final) Future Brood Document for a more accurate accounting and record of the current hatchery program. Credits for natural-origin smolt production from the upper Cowlitz River basin, as called for in the Cowlitz Fisheries and Hatchery Management Plan, are included in the 2008 Final Brood Document and these credits annually adjust the hatchery program production numbers.

We agree with the recommendation to classify the upper Cowlitz River basin coho population as a Primary population, and to the subsequent hatchery and fish management actions necessary to implement. We note that the Washington Department of Fish and Wildlife (reference: WDFW's Reevaluation of Coho Management in the Upper Cowlitz River Basin, 9/9/2008) has already announced their intent to implement an integrated hatchery program that is twice the size (1,000,000 versus the 500,000) of the program recommended by the HSRG within the next three years. Tacoma recommends the integrated population raised in the hatchery be programmed to mimic the size, timing and characteristics of the natural-origin coho outmigrants from the upper basin.

We agree with the recommendation to classify the lower Cowlitz River basin coho population as a Contributing population, and to the subsequent hatchery and fish management actions necessary to implement the recommendations. Modified beach seining or shallow-draft purse seining in the reach of the Cowlitz River immediately above the mouth of the Toutle River (river mile 20.0) could be tested to implement the proposal to remove HOR coho adults from the lower river to reduce the pHOS value.

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternative plan below

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

WDFW has developed an alternative plan that meets the standards for a Contributing population rather than a Primary population (LCFRB designation was Contributing). The current fish passage is estimated to be one half of what was assumed by the HSRG. This did not allow for the self-sustaining population required to meet the standards of a Primary population. However, as fish collection efficiency improves WDFW intends to manage the upper Cowlitz coho population as a Primary population.

Other Comments

WDFW agrees with the recommendation to change the lower Cowlitz coho population to a Contributing designation. Discussions have occurred with the LCFRB regarding this proposed change. This change has been submitted to the board for their consideration.

23. East Fork Lewis River Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

24. Kalama River Coho

Commenter Info

Commenter Name: Eric Kinne
Commenter Email: kinneebk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See other comments

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Reduce the S-type from 350,000 to 100,000. Increase the N-type from 350,000 to 600,000. WDFW believes that this will meet the standards for a Stabilizing population.

Other Comments

WDFW agrees with the recommendation to change this population to a Stabilizing designation. Discussions have occurred with the LCFRB regarding this proposed change. This change has been submitted to the board for their consideration.

25. North Fork Lewis River Coho

Commenter Info

Commenter Name: Erik Lesko

Commenter Email: erik.lesko@pacificorp.com

Commenter Organization: PacifiCorp Energy

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Discussions have occurred with the LCFRB regarding this proposed change from a Contributing to Stabilizing designation in the lower river. This change has been submitted to the board for their consideration. In addition, WDFW plans to begin discussions with the LCFRB on establishing coho as a Primary designation above the hydro projects. WDFW will work with LCFRB staff to evaluate the impact of these changes on recovery of this ESU. Until these changes are approved and reintroduction is implemented, WDFW will continue to operate programs consistent with current mitigation agreement and HGMP, as submitted to the Aquatics Coordination Committee. A settlement agreement was signed in October of 2006 which detailed a production levels as follows: 1.8 million coho for Hatchery and Supplementation (H&S) 1-3, 1.9 million for H&S years 4-5 and 2 million for H&S years 6-50. The new 50-year FERC order was issued in July of 2008.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

26. Sandy River Coho

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

There is no data to support the suggestion that stray hatchery coho from Bonneville Hatchery programs are found in the Sandy Basin. Staff is not aware of modeling that would suggest otherwise.

27. North Fork and South Fork Toutle Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

This program will consist of a 150,000-integrated-smolt release that meets the standards for a Primary population.

28. Washougal River Coho

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternative below

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

The current 2.5 million coho that are direct planted into the Klickitat River are part of the US v. Oregon agreement and will continue until YKFP's Klickitat Master Plan is implemented. Once the plan is implemented, Local brood will be collected at Lyle Falls on the Klickitat and an acclimation site will be built at Wahkiacus for acclimating these fish. Starting with brood year 2008, the Klickitat direct plant will be 100% mass marked.

The on-station late coho program at Washougal will be reduced from 500K to a integrated 150,000 release and 350,000 early coho will be reared and hauled to Deep River Net Pens for acclimation as part of the SAFE fishery.

3.2.2 Upper Columbia River Coho ESU

1. Methow River Coho

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The "no" above is a default to the "N/A" below.

N/A. Yakama Nation is implementing the coho reintroduction program, but WDFW remains a co-manager. WDFW believes the Yakama Nation intends to implement the phases that were described in the Observations section of the May 15 HSRG report that are consistent with the Coho Reintroduction Master Plan.

Identify Additional Rearing Locations: WDFW regional staff is generally in support of this initiative as a co-management agency. However, natural and semi-natural pond sites, as well as suitable water supplies are extremely limited in the basin. Availability is typically limited by private land ownership and/or local political resistance to hatchery programs. The co-managers need to coordinate on the best use of limited acclimation sites for steelhead, spring Chinook and coho.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The no above for "meeting HSRG Standards" was entered as a default only. Comment was entered as N/A.

Other Comments

WDFW assumes the HSRG recommendation is to rear the coho for a longer portion of their juvenile rearing period in the UCR rather than in the lower Columbia as presently conducted, and is in general agreement with the probable benefit of such an approach.

Refine Phases to Achieve a PNI >0.50 More Rapidly: WDFW regional staff agrees with the HSRG that AHA modeling generally indicates that productivity gains occur more rapidly if PNI can be maximized.

2. Wenatchee River Coho

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Actual text - The HSRG recommendations appear to be technically feasible.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

N/A Yakama Nation is implementing the coho reintroduction program, but WDFW remains a co-manager. WDFW believes the Yakama Nation intends to implement the phases that were described in the Observations section of the May 15 HSRG report that are consistent with the Coho Reintroduction Master Plan.

1) Identify Additional Rearing Locations: WDFW regional staff is generally in support of this initiative as a co-management agency. However, natural and semi-natural pond sites, as well as suitable water supplies are extremely limited in the basin. Availability is typically limited by private land ownership and/or local political resistance to hatchery

programs. The co-managers need to coordinate on the best use of limited acclimation sites for steelhead, spring Chinook and coho.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Note above: Staff response was NA for meeting HSRG standards. A no was out in a placeholder only.

Other Comments

WDFW assumes the HSRG recommendation is to rear the coho for a longer portion of their juvenile rearing period in the UCR rather than in the lower Columbia as presently conducted, and is in general agreement with the probable benefit of such an approach.

2) Refine Phases to Achieve a PNI >0.50 More Rapidly: WDFW regional staff agrees with the HSRG that AHA modeling generally indicates that productivity gains occur more rapidly if PNI can be maximized.

3. Clearwater River Coho

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM is attempting to develop a locally adapted broodstock for all program egg needs. We also desire to reinitiate the monitoring and evaluation program. However, due to funding constraints that is currently not feasible. The co-managers of the four Clearwater River hatcheries are also working together to determine how these facilities can work together to maximize survival and program effectiveness.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

4. Umatilla River Coho

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

The initial recommendations for this program will be implemented.

Local brood will be collected beginning with in 2009.

Beginning with the 2008 brood, all non-CWT smolts (900K) will be ad-clipped. CWT smolts (100K) will be non-ad clipped with wire and can be differentiated at 3MD from natural adults.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Program size is being reduced to 1.0M smolts beginning with the 2008 brood.

A stepping stone program will be evaluated in the future once differentially marked adults return to assess the ability to implement this type of program.

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

There is no funding for brood collections and monitoring of the program; however, program size has been reduced to 1.0 million smolts and the majority will be adipose clipped (BY08 release in 2010)

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Yakima River Coho

Commenter Info

Commenter Name: Dave Fast
Commenter Email: Fast@Yakama.com
Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Columbia River Hatchery Reform Project
Final Systemwide Report - Appendix F
3.2.2 Upper Columbia River Coho ESU

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The Yakama Nation agrees with the recommendations of the HSRG and plans to proceed with development and implementation of facilities and technologies to accomplish those recommendation. The recommendations of the HSRG are similar to the objectives in the Coho Master Plan for the Yakima

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Implemented under the YKFP management framework, of which WDFW is a co-manager. See comment #6

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Both No are default entries only as nothing was checked.

Other Comments

1) Why does the description of the current in-basin hatchery program say that pNOB is “not precisely known, but estimated to exceed 10%”? All hatchery coho (both in-basin stock and out-of-basin fish from LWS or Eagle Cr. hatcheries) have been adipose-clipped since the 2000 smolt release. Hatchery adults collected at Prosser Dam for the in-basin program can be distinguished from NOR’s by the absence of the adipose fin. The YN should know precisely how many NOR’s and how many in-basin and out-of-basin hatchery adults are used to perpetuate the in-basin hatchery program each year.

2) This report should also indicate the range and/or average percentage of the total adult return to Prosser Dam comprised of NOR’s and HOR’s (both “in-basin” and “out-of-basin”) beginning with the 2001 return when all hatchery adults were adipose clipped. Complete enumeration and identification of NOR’s and HOR’s is performed at the right bank fishway denil ladder and by video counts at all three fishways.

3) There is no mention of any DIT releases (CWT, but no adipose clip) to assess differential fishing mortality for mass-marked vs. unmarked coho in selective fisheries in the ocean and lower C.R. downstream from the Hood River bridge.

4) The future hatchery program with the integrated (in-basin) and segregated (out-of-basin) stocks also mentions both groups either getting an adipose clip or CWT (i.e., with no adipose clip). If the goal is to assess differential fishing mortality/survival of Yakima R. coho in selective and non-selective fisheries, shouldn’t the adipose-clipped fish also receive a CWT so that hatchery strays from other basins (e.g. Umatilla, upper C.R. tributaries, etc.) can be identified? A simple ad-clip mass-mark without the CWT does not achieve this.

5) In Sect. 2.2, paragraph 7: B) I don’t agree that lower C.R. coho should be used for in-basin program broodstock if the YN is unable to collect 430 female Yakima NOR’s. In-basin hatchery coho would be a preferred alternative if an insufficient number of NOR’s are available. In-basin hatchery coho should be differentially tagged relative to out-of-basin hatchery fish with a second CWT placement (e.g. posterior dorsal fin insertion) so they can be identified by wanding at Prosser and Roza. C) Also, the future integrated program does not mention a cap on the percentage of NOR coho that can be collected. The YKFP upper Yakima spring chinook broodstock protocol limits collection to a maximum of 50% of the run or the desired number, whichever is less. If not 50%, then a significant percentage of NOR coho should be allowed to spawn naturally in the wild.

3.3 CHUM

3.3.1 Columbia River Chum ESU

2. Columbia Estuary-Chinook River sea resources Chum

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

No funding for this project at this time.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

4. Elochoman Chum

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is seeking funding for this program.

5. Grays Chum

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Program is currently suspended due to lack of funding. WDFW agrees with the HSRG that Gray River chum should be used for other reintroduction programs on the lower Columbia River.

6. Mill, Abernathy and Germany Creek Chum

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

10. Cowlitz Chum**Commenter Info**

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Mark LaRiviere

Commenter Email: mlarivie@cityoftacoma.org
Commenter Organization: Tacoma Power

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Cowlitz River chum. We agree with the program recommendations. No additional comments offered.

11. Duncan Creek Chum

Commenter Info

Commenter Name: Eric Kinne
Commenter Email: kinneebk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Funding has been cut for the hatchery portion of the project. Monitoring portion is still funded. WDFW also agrees that a conservation program would be useful and will seek funding to implement program.

12. Kalama Chum

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

13. Lewis Chum

Commenter Info

Commenter Name: Erik Lesko

Commenter Email: erik.lesko@pacificorp.com

Commenter Organization: PacifiCorp Energy

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

To the extent that implementation does not conflict with either our FERC license or Lewis River Settlement Agreement, and dependent upon consultation with the Aquatics Coordination Committee (ACC) for the North Fork Lewis River.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Keith Keown

Commenter Email: keownkk@dfw.wa.gov

Commenter Organization: wdfw

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Other chum programs that indicate potential conservation programs in the ESU mention that fish be "marked".

The Lewis River Chum recommendation indicates an "adipose fin clip". For cost and ease of marking, otolith marking has proven effective for escapement monitoring. Adipose fin clipped chum would result in high levels of mortality.

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

WDFW agrees that additional monitoring is needed; however no funding is available at this time. Limited monitoring occurs during fall Chinook surveys.

WDFW also agrees that a conservation program would be useful and will seek funding to implement program.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

14. Salmon Creek Chum

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

16. Washougal Chum

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.4 STEELHEAD

3.4.1 Southwest Washington Steelhead DPS

1. Big Creek Winter Steelhead Population

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

2. Elochoman River Winter Steelhead Population

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

3. Gnat Creek Winter Steelhead Population

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

4. Grays River Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternative

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Maintain current program. Current program meets the standards for a Primary population; fish are acclimated prior to release. WDFW has the ability to remove unharvested hatchery origin fish at Gray River Hatchery.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

5. Mill, Abernathy and Germany Creek Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

6. Youngs Bay Tributaries Winter Steelhead**Commenter Info**

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.4.2 Lower Columbia Steelhead DPS

1. Hood River Summer Steelhead

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

This program has been discontinued; the final release of hatchery fish will be in April 2009

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

No further releases of hatchery fish are planned at this time.

Commenter Info

Commenter Name: Chris Brun
Commenter Email: cbrun@hrecn.net
Commenter Organization: CTWSRO

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

2. Hood River Winter Steelhead**Commenter Info**

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Chris Brun

Commenter Email: cbrun@hrecn.net

Commenter Organization: CTWSRO

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3. Wind River Summer Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Recent escapements have been 500+ adults annually. WDFW believes that this population does not need a conservation program at this time.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

4. Wind River Winter Steelhead (Late)

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

5. Coweeman River Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

WDFW is developing an alternative plan.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

WDFW is in the process of modeling an integrated program for this population that will meet the standards of a Primary population.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

6. East Fork Lewis River Summer Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Program will be reduced from 30,000 to 15,000 smolts. WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

7. East Fork Lewis River Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternate plan below

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

WDFW is working with the LCFRB the change the designation of the population from Primary to Contributing; the new program meets the criteria of a Contributing population. Even with this change of designation for this population, the Cascade winter steelhead strata scenario would exceed TRT objectives for recovery. A weir may be looked at in the future that would allow for this population to be upgraded back to a Primary

population. Program consists of reducing the current release from 90,000 to 60,000 and increasing the bag limit to remove as many unharvested hatchery adults as possible.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

8. Kalama River Summer Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternative below

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Maintain current programs. Current programs meet the standards for these populations. The needs of the ongoing reproductive success study require the continuation of the current programs. Current programs provide a significant harvest benefit.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

9. Kalama River Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternative below

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Maintain current programs. Current programs meet the standards for these populations designation. Current programs provide a significant harvest benefit.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management

Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

10. Lower Cowlitz River Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW will need to work with the LCFRB regarding changing population designation from Contributing to Stabilizing.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

Commenter Info

Commenter Name: Mark LaRiviere

Commenter Email: mlarivie@cityoftacoma.org

Commenter Organization: Tacoma Power

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Lower Cowlitz River winter steelhead. We agree with the recommendation to classify these fish as a Stabilizing population. Currently samples are being collected to determine the genetic interactions of the steelhead stocks in the lower Cowlitz River and tributaries. If the HSRG recommendations are followed, the non-indigenous early winter-run and summer-run steelhead programs will be able to continue at currently planned levels (see the Cowlitz River Fisheries and Hatchery Management Plan for more details about these stocks). These programs support important in-river sport fisheries.

11. North Fork Lewis River Summer Steelhead

Commenter Info

Commenter Name: Erik Lesko

Commenter Email: erik.lesko@pacificorp.com

Commenter Organization: PacifiCorp Energy

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

We recommend the elimination of juvenile rearing programs for the Speelyai net pens and Skamania egg transfers (110,000 fish) and Elochoman out of basin transfer (35,000 fish). These programs contribute to potential straying (Elochoman program) and predation on NOR within the North Fork Lewis River.

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

12. North Fork Lewis River Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW agree with the change to a Stabilizing population. Discussions have occurred with the LCRFRB regarding this proposed change. This change has been submitted to the board for their consideration. WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

Commenter Info

Commenter Name: Erik Lesko

Commenter Email: erik.lesko@pacificorp.com

Commenter Organization: PacifiCorp Energy

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

13. North Fork Toutle Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

A temporary weir will be installed at the North Toutle Hatchery intake to allow for a higher harvest rate of summer STHD returns. WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

14. Salmon Creek Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

15. Sandy River Winter Steelhead

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

16. South Fork Toutle Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne
Commenter Email: kinneebk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

We are implementing the first recommendation of reducing the size of the program to 15,000 smolts released.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

17. Upper Cowlitz River Winter Steelhead

Commenter Info

Commenter Name: Eric Kinne
Commenter Email: kinneebk@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates. In addition, WDFW is working with the Cowlitz Fisheries Technical Committee (FTC) on determining when to start the productivity testing of this stock.

Commenter Info

Commenter Name: Mark LaRiviere

Commenter Email: mlarivie@cityoftacoma.org

Commenter Organization: Tacoma Power

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Upper Cowlitz River winter steelhead. We agree with the HSRG recommendations for developing an alternative program to the current upper Cowlitz River basin hatchery steelhead program. Although the testing outlined in the Cowlitz Fisheries and Hatchery Management Plan has not been completed, natural-origin upper basin winter steelhead

may have reached the point of a self-sustaining population based on current abundance and productivity measures. Tacoma recommends the integrated population raised in the hatchery be programmed to mimic the size, timing and characteristics of the natural-origin steelhead outmigrants from the upper basin.

18. Washougal River Summer Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

This program will consist of a 20,000- segregated program and a 40,000-integrated program. This is a smaller program than HSRG recommended. WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

20. Willamette - Clackamas Winter Steelhead

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

We are not sure where the recent hatchery of about 25% from McElhaney et.al. 2007 was derived. No marked hatchery fish are passed upstream of North Fork Dam and the hatchery stray rate to select lower basin tributaries is less than 35%. There is little to no stray of hatchery fish to other tributaries outside of the Clackamas Basin (e.g Johnson Creek, Tryon Creek).

In the observation section the HSRG refers to the lower Clackamas Basin as being heavily dominated by hatchery fish. Despite the fact that almost 500,000 hatchery fish are released into the lower basin, hatchery strays are primarily found in Eagle Creek. The vast majority of available spawning habitat is outside of Eagle Creek.

We recently began integrating wild fish collected by hook and line in the lower river to the Clackamas winter steelhead program. We now start collecting fish in January from anglers targeting early returning steelhead and continue to collect fish from them through March when most switch to spring Chinook fishing for the season. The goal is to truly represent the run timing of winter steelhead returning to the Clackamas Basin not just fish returning to North Fork trap in mid to late spring.

District staff do not believe that introduced summer steelhead are of significant concern on the lower basin since there is limited evidence of natural spawning of hatchery summer steelhead in any area of the lower Clackamas River. There is some concern with potential residualism of smolts and corresponding competition for available rearing space but the majority of suitable rearing habitat for native winter steelhead is not found in the lower mainstem river where residual hatchery steelhead may be found. District staff does not believe the potential concern for introduced summer steelhead found by Kostow et. al. in the upper basin applies to the current situation with this program.

3.4.3 Upper Willamette Steelhead DPS

2. Willamette - Mainstem Willamette Steelhead

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3. Willamette - McKenzie Steelhead

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

4. Willamette - Middle Fork Willamette Steelhead

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.4.4 Middle Columbia Steelhead DPS

2. Klickitat Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3. White Salmon Summer Steelhead

Commenter Info

Commenter Name: Eric Kinne

Commenter Email: kinneebk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

WDFW agrees that with the removal of Condit Dam managers should discontinue these programs. Once Condit Dam is removed these programs will be re-evaluated.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

4. Deschutes-Eastside Tributaries Summer Steelhead

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Deschutes-Westside Tributaries Summer Steelhead

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

11. Naches Summer Steelhead

Commenter Info

Commenter Name: Dave Fast

Commenter Email: Fast@Yakama.com

Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above. CRITFC and the Yakama Nation plan to continue the kelt reconditioning program. WDFW is not directly involved in this program.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Both "No" entries are default only as none were entered.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

Other Comments

1) Although some Naches Basin and upper Yakima steelhead may over-winter in the lower Yakima R. in the vicinity of Satus Cr. and Toppenish Cr., and consequently, be afforded protection from illegal fishing activity from the new, seasonal "closed waters" regulation adopted on 5/1/08 to protect the Satus and Toppenish steelhead populations, a significant number of upper basin fish over-winter in the Yakima area "Union Gap-to-Selah Gap" reach, particularly near the mouth of the Naches River. Another fishing rule change proposal is currently pending before the Fish & Wildlife Commission that will close the Yakima R. from the SR 223 bridge at Granger to Roza Dam to fishing from Nov. 1 through the first Sat. in June, with the exception of a targeted, winter whitefish season from Dec. 1 - Mar. 31 restricted to using "winter whitefish gear" only. This should reduce the illegal catch & release steelhead fishery at and below the mouth of the Naches River during the winter months. During the "all game fish" open season from June thru Oct. 31, we are proposing to change to "selective gear rules" to eliminate bait fishing and treble hooks from Sunnyside Dam to Roza Dam, which should reduce

incidental hooking mortality to non-legal O. mykiss (under 12" or greater than 20" TL). These rule changes, if adopted, will go into effect on May 1, 2009 and would provide protection for the 2009-10 Naches Basin and upper Yakima steelhead runs.

2) Steelhead have been observed spawning in the American River, but at low levels. Four redds (with fish on the redds) were observed during the 2005 drought year when survey conditions were excellent. They spawn in Oak Creek, a tributary to the Tieton River, and likely spawn in the Tieton R. as well, although spawning surveys are not possible because of turbidity from Rimrock Reservoir releases and this has not been confirmed.

12. Satus Creek Summer Steelhead

Commenter Info

Commenter Name: Dave Fast

Commenter Email: Fast@yakama.com

Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above. CRITFC and the Yakama Nation plan to continue the kelt reconditioning program. WDFW is not directly involved in this program.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Note: neither yes or no was indicated. Both yes were checked as default values. See also below.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

Other Comments

Illegal harvest or incidental fishing mortality of steelhead during the winter holding period in the vicinity of the mouth of Satus Cr. (e.g. Satus Bar area) should decline significantly beginning in 2008-09 because of a new fishing rule change that became effective on 5/1/08. The open season in this area for all game fish (e.g., whitefish, bass and catfish) has been reduced to May 1 - Oct. 31. From Nov. 1 - April 30, the area from Prosser Dam to the SR 223 bridge at Granger is now "closed waters." Any person observed fishing during this period is in violation and can be cited by Enforcement. This should deter anglers from using the winter whitefish fishery as a ruse to illegally fish for steelhead.

13. Toppenish Creek Summer Steelhead

Commenter Info

Commenter Name: Dave Fast

Commenter Email: Fast@Yakama.com

Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additonal comment to "Yes" above.

CRITFC and the Yakama Nation plan to continue the kelt reconditioning program.

WDFW is not directly involved in this program.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Both "No" entries are default only. Nothing checked in those entries.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

Other Comments

Illegal harvest or incidental fishing mortality of steelhead during the winter holding period in the vicinity of the mouth of Satus and Toppenish Cr. (e.g. Satus Bar area) should decline significantly beginning in 2008-09 because of a new fishing rule change that became effective on 5/1/08. The open season in this area for all game fish (e.g., whitefish, bass and catfish) has been reduced to May 1 - Oct. 31. From Nov. 1 - April 30, the area from Prosser Dam to the SR 223 bridge at Granger is now "closed waters". Any person observed fishing during this period is in violation and can be cited by Enforcement.

14. Touchet River Summer Steelhead

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

CTUIR does not agree with the PNI as presented and does not feel that there is scientific data to support the specific values for primary and contributing populations.

Table 1 shows the same productivity and higher harvest levels with the current program than the one recommended.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The parties to US v. OR have agreed to develop a steelhead management plan for this basin to be initiated with brood year 2010.

There appears to be a discrepancy between the potential program size identified in Section 2.2 (200K) and that in the Recommendations section (70K).

Commenter Info

Commenter Name: Glen Mendel

Commenter Email: mendegwm@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above.

Yes , in part. Improvements to existing facilities will be pursued (particularly at the newly refurbished Dayton Dam / Trap) to remove LFH hatchery stock, and modify the trap and weir to force all returning fish through the fish ladder and trap. Steelhead smolts from the endemic program could be acclimated at the existing Dayton acclimation pond if the Touchet endemic program can be sufficiently expanded to replace the LFH stock. Over utilization of natural origin brood stock to support hatchery supplementation could negatively impact wild population demographics.

Currently the use of an endemic or integrated option to completely replace LFH stock would reduce wild fish spawning naturally, at least in the short-term, and it may reduce or eliminate non-tribal harvest in the lower Touchet because harvest would have to shift to ESA listed hatchery fish. This would not likely achieve LSRCF mitigation goals.

Lyons Ferry Stock steelhead releases could be discontinued in the Touchet River. There would be impacts to mitigation obligations associated with this action as the existing Touchet endemic stock program is not capable of providing sufficient fish numbers to meet Lower Snake River Compensation Plan mitigation program needs. To date the endemic program in the Touchet has not been as successful as hoped for in meeting its goals.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

The recommendations for use of Walla Walla brood stock provide for very limited options to operate a segregated program meet established ESA recovery AND LSRCP mitigation goals. Other options are available and they will be considered. Use of local returning hatchery fish for Broodstock does not address some of the major causes for straying by returning Walla Walla / Touchet River fish such as lack of water, or suitable habitat in the lower Walla Walla and lower Touchet in fall and early winter.

See comments above regarding removal of hatchery fish at the Dayton Dam.

Other Comments

The HSRG review is step 1 of our expected review for steelhead hatchery programs in SE WA. The USFWS hatchery review for LSRCP facilities is step 2.

Additionally, WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

15. Umatilla Summer Steelhead

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

ODFW would support population classification of Primary and reduce program size. Our recommendation would be 65,000 smolts, primarily for operational reasons and existing infrastructure.

16. Upper Yakima Summer Steelhead

Commenter Info

Commenter Name: Dave Fast

Commenter Email: Fast@Yakama.com

Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The table presents data for 'current' as only two steelhead in the Upper Yakima and 54% PHOS. The YN does not believe this portrays the current status of this population.

We do agree with the recommendations, and plan to continue and improved the monitoring and evaluation of all steelhead populations in the Yakima.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above.

CRITFC and the Yakama Nation plan to continue the kelt reconditioning program. WDFW is not directly involved in this program.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

Both "No" are default entires only as none were entered.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

Other Comments

Although some upper Yakima steelhead may over-winter in the lower Yakima R. in the vicinity of Satus Cr. and Toppenish Cr., and consequently, be afforded protection from illegal fishing activity from the new, seasonal "closed waters" regulation adopted on 5/1/08 to protect the Satus and Toppenish steelhead populations, a significant number of upper basin fish over-winter in the Yakima area "Union Gap-to-Selah Gap" reach, particularly near the mouth of the Naches River and below Roza Dam. Another fishing rule change proposal is currently pending before the Fish & Wildlife Commission that will close the Yakima R. from the SR 223 bridge at Granger to Roza Dam to fishing from Nov. 1 through the first Sat. in June, with the exception of a targeted, winter whitefish season from Dec. 1 - Mar. 31 restricted to using "winter whitefish gear" only. This should reduce the illegal catch & release steelhead fishery at and below the mouth of the Naches River during the winter months. During the "all game fish" open season from June thru Oct. 31, we are proposing to change to "selective gear rules" to eliminate bait fishing and treble hooks from Sunnyside Dam to Roza Dam, which should reduce incidental hooking mortality to non-legal O. mykiss (under 12" or greater than 20" TL). These rule changes, if adopted, will go into effect on May 1, 2009 and would provide protection for the 2009-10 Naches Basin and upper Yakima steelhead runs.

17. Walla Walla River Summer Steelhead

Commenter Info

Commenter Name: Brian Zimmerman
Commenter Email: brianzimmerman@ctuir.com
Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

In-basin acclimation and recapture facilities do not exist and there is no identified funding source to implement this recommendation.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

There is still a wide gap in positions between basin co-managers on this program. CTUIR agrees with the recommendation to change to local broodstock but not with the removal portion of the recommendation.

CTUIR feels that as long as hatchery fish are of the appropriate stock that they can make a valuable contribution in seeding underutilized habitat and should not be necessarily limited by a finite PNI or PHOS value.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The parties to US v. OR have agreed to develop a steelhead management plan for this basin to be initiated with brood year 2010.

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Glen Mendel

Commenter Email: mendegwm@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above.

Technically, all out-of basin fish stocking could be eliminated. The feasibility of developing a new locally adapted hatchery brood stock program, including collection facilities, etc., would need extensive review and eventually sufficient funding support.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

WDFW agrees that a locally derived brook stock may be feasible, however costs for implementation of trapping and hauling adults, development of acclimation facilities etc., would be expensive, compared to the current program, especially with adult steelhead returning to the system over several months, and may not produce the desired results. A Walla Walla acclimation site would need to operate from December or January through May if it was to provide a place for hatchery fish to home in on so they would not spawn with wild fish. As noted in Section 1 of the HSRG review, it is estimated that only approximately 2% of the hatchery steelhead entering the mouth of the Walla Walla River actually spawn with NORs due to significant spawn timing differences. No data is presented which confirm or support high stray rates for hatchery fish into identified high use NOR spawning areas. Spawn timing, habitat use areas, and current stocking

locations of out of basin stock fish (LFH) are factors that are contributing significantly to a segregated hatchery program, which minimizes impacts upon local Walla Walla populations. More can be done in minimizing potential HOR impacts upon wild fish, however, use of local returning hatchery fish for Broodstock does not address some significant causes for straying such as lack of water or suitable habitat in the lower Walla Walla in fall and early winter.

Use of an endemic or integrated option would reduce wild fish spawning naturally, at least in the short-term, and it may reduce or eliminate non-tribal harvest because harvest would have to shift to ESA listed hatchery fish. This would not likely achieve LSRCP mitigation goals.

The HSRG review is step 1 of our expected review for steelhead hatchery programs in SE WA. The USFWS hatchery review for LSRCP facilities is step 2. The completion of the regional (SE WA) steelhead management plan (as part of the WA State steelhead management planning process) is step 3 in our review of steelhead hatchery and management actions for SE WA.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Additional comments. "Yes in part".

The conclusion that “under any scenario, facilities to acclimate and release juveniles and recapture returning adults will need to be developed” is one option for operating a segregated hatchery program and minimizing the effects on ESA listed wild fish. Improving adult enumeration and composition monitoring at Burlingame Dam (above the mouth of Mill Creek), at Nursery Bridge, and at Bennington Dam (in Mill Creek) could determine if the percentage of hatchery fish entering spawning grounds is over 5%, and it could provide the option to remove hatchery fish at those sites, or collect local broodstock. This would ensure separation of the segregated hatchery fish from productive natural spawning areas used by “wild” fish in the upper basin. This option may then preclude the need for acclimation or a lower river adult weir. WDFW and other fish managers in the basin are exploring these options. This option could potentially meet the final HSRG recommendation to operate an adult collection facility to better segregate hatchery fish from steelhead habitat below Nursery Bridge.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

3.4.5 Upper Columbia Steelhead DPS

2. Methow Summer Steelhead

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

No, long term or year-round rearing sites have not been identified; there is no Joint Fishery Party agreement on a reduced mitigation program, or for increased adult management at Wells Dam or other in-basin locations; and NOAA Section 10 permits need to be modified to allow much of what is being proposed. Despite this, WDFW regional staff fully support the concepts and goals in the HSRG recommendations, consistent with achieving near full seeding of habitats.

Integrated Program of 100K Smolts and 25% pHOS: WDFW regional staff fully supports the goal of management of Methow steelhead as a Primary population. Obstacles include a current inability to identify hatchery fish to basin of origin at Wells Dam, currently the only facility where pHOS could be controlled. Terminal selective fisheries are not sufficiently effective to control pHOS so as to meet the PNI objective for a Primary population. Smolt production levels, program PNI, and escapement are in conflict; there is insufficient NOS in most years. An enlarged smolt marking program and public acceptance of large scale fish removal at Wells (or upstream) is required. This Recommendation also does not meet the current HCP mitigation goal of 450K smolts. Joint Fishery Party agreement is needed for a reduced mitigation program. Further, this strategy has a high likelihood of low escapement levels. Because this population is above nine hydro projects, in the short term, maximized natural production is important, even if it results in a decrease in overall productivity. Achieving full or near full seeding of the available habitat is an important demographic consideration in the short-term.

Develop In-Basin Full or Long Term Rearing: WDFW regional staff supports this concept. Suitable sites have not been fully identified, although a preliminary screen of public lands in the Methow Basin suggests several sites could potentially be purchased and developed, or cooperative agreements might be possible. Field reconnaissance and assessments are needed to follow up on the initial aerial photos and map screening. Existing irrigation diversions may have the potential to supply water to some of these putative sites.

Develop a Sliding Scale of Brood and Adult Management: While WDFW regional staff fully support this management approach in principle, local public support is needed for more intense control of pHOS. Wells Dam has the potential to serve as a short stop to remove hatchery fish. However, adult management 24/7 at Wells Dam may slow migration. Development of multiple acclimation ponds (distinct water sources) could serve as additional adult collection locations and provide the opportunity to conduct bubble fisheries near these locations to improve fishery efficacy for adult removal while reducing impacts to natural origin steelhead. These management strategies will require additional infrastructure and modifications to the existing Section 10 permit at a minimum. Basin-unique marking at the 100% level is required (would require a US v OR revision in all Options). Generator unit upgrading (rewinding) at Wells over the next several years may impact the ability to use both fishways to sample or handle the run.

The lack of adult collection capability in the Methow Basin proper (apart from the Twisp weir) is a major obstacle to managing the Methow sub-population separately from the Okanogan.

Implement a Stepping Stone Program of 350K Smolts in the Lower Basin: Although this is technically feasible, differential marking of 100% of the smolt production from both the Methow and Okanogan basins is required. Currently nearly all hatchery fish removal would have to occur at Wells Dam which is problematic (see #3, above). A major shift in terminal fishery management to greatly increase hatchery fish removal efficiency (e.g. compulsory hatchery fish retention and/or bonus limits) coupled with adult removal capability no higher than the Town of Twisp (e.g. at the MVID diversion dam) might allow a segregated program to work towards recovery of upper basin and Twisp River stock components (see #3 above). Sites need to be acquired and developed for long term acclimation with the capability of volitional smolt releases and collection of non-migratory residuals that would be planted into area lakes or ponds.

Although the “stepping stone” strategy provides the opportunity to meet mitigation production and manage the spawning composition for a target PNI of > 0.67 , some escapement years (low abundance years) may require a greater spawning contribution of fish. Therefore, a “stepping stone” program with a greater number of hatchery fish released in the upper basin may be needed. A review of program SARs could provide a revised number of smolts released in the upper basin to assure more complete seeding of available habitat.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The no above for "meeting HSRG Standards" was entered as a default only. Comment was entered as N/A.

Additional comment to "Have you developed alternative recommendation plan"

The current program will continue until the key obstacles to program change have been addressed.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

Other management issues include:

- a) Survival and residualism from a 2-year smolt program is unknown; the latter is likely to be substantial.
- b) The reproductive potential of the various parental crosses is unknown; do WxW crosses produce best? Does the AHA Model take this into account, as well as F1s versus F2s?
- c) Douglas PUD is planning to support genetic analysis on archived material in 2008 or 2009; earlier work indicated that all hatchery and natural origin fish sampled were largely homogenized.
- d) Any integrated program will require expanded ability to locally collect brood and control hatchery escapement. WDFW will begin to collect run composition data at the Twisp weir beginning in 2009, but similar capability and information is sorely needed in the mainstem Methow and Chewuch Rivers as well.

Commenter Info

Commenter Name: Steve Parker

Commenter Email: parker@yakama.com

Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The Yakama Nation is advocating for a slight modification of the HSRG recommendations. The U.S. v Oregon parties tentatively have agreed to distribute the Wells Hatchery production in the Methow Basin in such a manner that 100,000

WxW or WxH smolts are released from acclimation sites in the upper watershed adjacent to suitable natural production areas. As it is the intent of these releases to increase the abundance of natural spawners in the upper basin, it is not anticipated that 75% of these ESA-listed fish would be removed prior to spawning. The remaining 350,000 HxW and HxH smolts could be released at various points in the mid-lower watershed to support a terminal fishery and, if suitable habitats exist, ancillary natural spawning.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

See above. With careful broodstock management it is likely that at least PNI recommendations could be achieved.

Commenter Info

Commenter Name: Tom Kahler

Commenter Email: Tkahler@dcpud.org

Commenter Organization: Douglas PUD

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

This is a qualified “No.” Douglas PUD is not opposed to implementing some derivation of the recommendations, but cannot unilaterally commit to implementation of the recommendations as presented. Management of the hatchery programs funded by Douglas PUD is governed by the Wells Hydroelectric Project Habitat Conservation Plan (Wells HCP) Hatchery Committee, consisting of representatives of each Party to the HCP, including the Colville Confederated Tribes, Douglas PUD, the National Marine Fisheries Service, Washington Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, and the Yakama Nation. Each of these parties has their unique perspective on hatchery management and the role of hatcheries in the recovery of Threatened and Endangered species. In some cases, these perspectives are widely divergent. Wells HCP Hatchery Committee decisions are by unanimous consensus. Thus, we cannot presuppose the outcome of the ongoing Committee discussions on the future management of the hatchery programs funded by Douglas PUD; although program changes are likely.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Douglas PUD’s reason for developing an alternative recommendation for Wells HCP Hatchery Committee consideration is to more specifically distinguish between steelhead produced for inundation or passage-loss compensation, and to ensure that mitigation obligations are maintained. The following alternative is conceptual and should easily meet the HSRG standards when fully developed. The concept relies on the Twisp Weir and/or angling for the collection of NOB, and on the use of Wells Dam to modulate upstream run composition. One-hundred-percent removal of hatchery fish is possible at Wells Dam, and differential marking of hatchery fish would allow modulation of the run composition above Wells Dam to meet multiple management objectives. Collection of NOB for integrated conservation programs of the size proposed could be accomplished with tributary specific angling and/or collection facilities such as the Twisp Weir, and the weir provides another location above which run composition could be modulated. These management tools provide the opportunity to separate the existing Wells steelhead program into segregated and integrated components. The Wells HCP Hatchery Committee will make the final determination regarding any changes to the Douglas PUD steelhead program and they have yet to consider the following conceptual alternative.

Douglas PUD mitigation obligations for steelhead production include both compensation for inundation (300,000 fish) and passage (48,858 fish) losses. The original intent of the inundation-compensation fish was for harvest augmentation in the Columbia River. The 48,858 passage-loss fish were considered supplementation fish. Consistent with the HSRG recommendation that an integrated program releasing approximately 100,000 smolts in the Methow could operate to meet the "Primary" population designation, Douglas PUD proposes a program with 100% NOB collected from the Twisp River releasing 48,858 smolts into the Twisp River, and using the Twisp Weir to manage pHOS. The remaining approximately 50,000 smolts (of the 100,000 from the HSRG recommendations) could be produced by Winthrop NFH or Wells Hatchery from NOB collected from the mainstem Methow or Chewuch rivers, with progeny released back to those rivers. This alternative assumes that the percentage of HOS in the Methow outside of the Twisp could be controlled by selective harvest and collection at Wells Dam (and any broodstock collection facilities constructed in the future). An additional assumption is that the 300,000 inundation-compensation fish could be released directly to the Columbia River from Wells Hatchery, and broodstock could be collected from the Wells Hatchery volunteer channel. This scenario generally fits with the HSRG recommendations, and could include the "variable sliding scale" to buffer the demographic risk and even the "stepping stone" program as described in the recommendations. Finally, this scenario requires adipose fin-clipping of all hatchery origin steelhead released above Wells Dam (other additional marks may be necessary). Besides facilitating control over run and broodstock composition, 100% marking would simplify and substantially improve the monitoring and evaluation of steelhead hatchery programs.

Other Comments

Please note that under "Observations" on Page 4, Paragraph 1, Line 4, the "Habitat Conservation Plan Committee, Hatchery Sub Committee" should be the "Habitat Conservation Plan Hatchery Committee." The Priest Rapids Settlement Agreement PRCC uses the "subcommittee" designation, but the Wells HCP does not.

The last line on Page 4 (Observations section, Paragraph 2): please capitalize "river" and insert the word "and" between "weir" and "selective." Sentence should read, "other than the Twisp River weir and selective fishing."

Commenter Info

Commenter Name: Stephen Grabowski
Commenter Email: sgrabowski@pn.usbr.gov
Commenter Organization: Bureau of Reclamation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Qualified and conditional no. My comments below in "other" primarily address the Winthrop National Fish Hatchery program, which is funded in part by Reclamation, along with BPA. Discussions are in progress on hatchery reforms based on the FWS HRT report. FWS operates the Leavenworth Hatchery for the funding agencies. Reclamation typically defers to FWS on detailed technical feasibility issues.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Qualified and conditional no. This report is still a draft, and discussions are in progress on hatchery reforms at the Winthrop NFH based on the FWS HRT report. FWS operates the Winthrop Hatchery for the funding agencies. Any implementation of recommendations must be reviewed by the funding and operating entities.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

Qualified and conditional no. This report is still a draft, and discussions are in progress on hatchery reforms based on the FWS HRT report. FWS operates the Winthrop Hatchery for the funding agencies. Any alternative plan must be reviewed by the funding and operating entities.

Other Comments

Specific technical comments:

Page 2, section 2, 3rd paragraph, line 2. The report here notes a 12-year geometric mean, while in other places it notes an 8-year geometric mean.

Page 3, first line, bullet statement continuing from Current Population Status and Goals from page 2. This bullet is Habitat Productivity and Capacity. It is unclear what this bullet statement means. Does "capacity" refer to carrying capacity? And of adults or juveniles? Are the productivity numbers listed the current productivity for each of those two populations?

Page 3, section 2.2, two bullet statements. The draft should explain or note how the number of hatchery strays were determined or estimated.

Page 3, section 3, HSRG Review, line 4. Define the term “effective hatchery-origin spawners.” Does “effective” mean the number of hatchery-origin fish on the spawning grounds or the number of hatchery-origin fish that spawn successfully?

Page 4, section 3.1, Effect on Population, 1st paragraph, line 2. Presumably fish from this program do not migrate in the Snake River so we suggest deleting Snake River from this discussion.

Page 4, section 3.1, 2nd paragraph, line 2. Here the report notes that adjusted productivity would increase from 0.6 to 1.4, but on page 2 the report says a 12-year geometric mean productivity of 0.09. Are these adjusted productivities 12-year geometric means? In this paragraph the statement is made again that harvest contribution of the natural and hatchery populations would go from about 1,729 fish to about 63 fish. Should this actually say that harvest without the hatchery program would decrease from 1,729 to about 63 fish (perhaps based on model results?). This should be clarified wherever else this statement occurs.

Page 4, Observations. Somewhere in this paragraph the report ought to acknowledge that the Winthrop NFH, as well as the other units of the Leavenworth NFH complex, were constructed as mitigation for the construction of Grand Coulee Dam and the lost anadromous production in the Columbia Basin upstream from the site of Grand Coulee Dam.

Page 5, Recommendations, first paragraph. This paragraph suggests developing the capability to provide within-basin full-term rearing to meet conservation and fishery objectives. The report should provide some additional detail about what this means. Does this include developing a locally derived and adapted steelhead broodstock, conducting all incubation and rearing, as well as releases, within the basin?

Third paragraph. Would all the juveniles from a 100% pNOB be marked, or just some portion of them?

3. Okanogan Summer Steelhead

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

See Other Comments.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Current HCP mitigation objectives cannot be met without using brood collected at Wells Dam. Additional comments:

Regarding a phased transition, WDFW regional staff supports this recommendation with the acknowledgement that natural production is likely to be very limited in the basin below Zosel and Enloe Dams. In-basin rearing and acclimation facilities are needed, and include the same water quality and quantity challenges noted for Chinook programs. A Contributing sub-population status should be the goal until such time as habitat improvements, successful adult collection, and production monitoring indicate a Primary designation is feasible. If control of hatchery steelhead escapement within the Okanogan River basin is added to that deemed necessary for the Methow basin, full marking to allow pHOS control at Wells Dam is needed. There currently is no adult steelhead collection or removal capability in the Okanogan Basin other than at Omak Creek.

Phase 1 Develop a Locally-Adapted Broodstock: Yes. Adult returns from smolts released into the Okanogan, adults trapped in Omak Creek (or other tributaries), and kelts reconditioned at the Cassimer Bar facility would be used to develop an initial broodstock. Unique marking of smolts released into the Okanogan basin is required for the first adult collection group. If suitably large natural-origin adult collections can be made within the basin they can substitute for brood collected at Wells Dam to meet the current HCP mitigation objective. While WDFW regional staff supports this concept, little direct evidence of natural-origin adult returns has been documented to date (see errors of omission remarks in the first paragraph, above).

Phase 2 Introduce Steelhead Into Improved Habitat: Yes. WDFW regional staff agrees with this approach in principle. Ideally, acclimation sites would be developed within or very near the drainages which have been improved, or into which access has been restored.

Phase 3 As NOR increases, increase pNOB and PNI: Yes. WDFW regional staff agrees with this approach in principle. An integrated supplementation program based on local brood collection will require infrastructure for adult collection, pHOS control, and juvenile rearing/acclimation, little of which currently exists.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The no above for "meeting HSRG Standards" was entered as a default only. Comment was entered as N/A.

Additional comment to "Have you developed alternative recommendation plan"

No, other than continuation of Colville Tribes' exploration of potential brood collection and test reintroductions.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

WDFW regional staff is in general agreement with the principles and phased transition approach suggested, however whether basin habitat can ever support a Primary population is highly problematic. An inability to collect local brood prevents managing for separate populations above Wells Dam at this time, although the Colville Tribes are interested in developing adult collection capability on Salmon, Bonaparte, and Loup Loup Creeks to augment the current prototype trap on Omak Creek. An enlarged smolt marking program may be required; current sampling in the Okanogan basin and interpretation of unmarked steelhead as being of natural origin may include errors of omission where hatchery smolts were not marked, or small elastomer tags were overlooked in returning adults.

The principal management issues include:

- a) Reliable information is needed on whether smolt survival to adult is adequate and residualism is suitably low from a 2-year smolt program.
- b) New or expanded marking programs are needed to enable more reliable and accurate run size prediction, selective fisheries, and adult management capability if an integrated program is developed in the Okanogan River basin.

Commenter Info

Commenter Name: Jerry Marco
Commenter Email: jerry.marco@colvilletribes.com
Commenter Organization: Colville Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
Yes

Implementation Plan

Do you plan to implement the recommendations as presented?
Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?
No

Other Comments

The Colville Tribes have recently provided an Okanogan Basin Summer Steelhead Master Plan which includes an HGMP to the NPPC, NMFS and the ISRP. This plan, including the goals and objectives of the HGMP are consistent with the recommendations identified above.

4. Wenatchee Summer Steelhead**Commenter Info**

Commenter Name: Steven Hays
Commenter Email: steve.hays@chelanpud.org
Commenter Organization: Chelan County Public Utility District

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
No

If no, please describe why:

Chelan County PUD's hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG

recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD's hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Chelan County PUD's hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD's hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Steve Parker

Commenter Email: parker@yakama.com

Commenter Organization: Yakama Nation

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The Yakama Nation does not operate this hatchery program but, as one of the relevant fishery managers for the Wenatchee Basin, is involved in the consensus decision-making required to modify any of the production programs included in the current U.S. v Oregon managment plan. Both of the HSRG options would reduce the effectiveness of the steelhead mitigation programs intended to replace wild steelhead destroyed by PUD-owned dams on the mainstem Columbia River. While we understand and generally

agree with the PNI principles at the center of HSRG recommendations, we are not as convinced of the conclusions drawn from the AHA model runs based on some of the assumed input values. Further, it is unclear to us how ad-clipping 100% of NOB offspring, which are listed under the ESA, and removing 80% of them prior to spawning, comports with ESA take prohibitions and recovery of listed populations. Option 2 would sequester 75% of the mitigation program fish in the lower Wenatchee and preclude any contribution to the natural spawning population. Again, we understand the basis for the HSRG recommendation to minimize the presence of hatchery-reared fish on the spawning grounds, but we simply are not as convinced by the available empirical data that the conclusions are certain enough to warrant a wholesale dismantling of the current management approach. We conclude that there remain many improvements in basic hatchery practices and smolt release strategies that bear further development before concluding that the hatchery program at its current production level cannot effectively contribute to the recovery of this steelhead population.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

The Yakama Nation has not developed a detailed implementation plan for Wenatchee steelhead. However, a concept plan would feature the collection of broodstock at Tumwater Dam with adherence to PNI principles to the extent possible while meeting mitigation and natural production goals. As part of the plan, juveniles would be acclimated at dispersed sites throughout the watershed to encourage adult returns to suitable habitats and in densities appropriate to those habitats. It is likely that this attention to basic culture practices would significantly increase the production of smolts per spawner over that currently estimated for hatchery-produced steelhead released in the watershed. Higher returns of adults hatched in the gravel would allow the managers to vary natural escapements over a period of years to construct a production model for estimating MSY escapement for the population. Terminal fisheries would serve as a tool for managing pHOS in the event that broodstock and natural escapement goals are met.

Other Comments

The Yakama Nation concludes that the HSRG recommendations for Wenatchee steelhead are narrowly constrained by the results of AHA model runs that are biased by presumptions about the relative fitness of hatchery-reared and naturally-produced fish. We believe these conclusions are premature based on the uncertainty of empirical evidence. The PNI concept has intuitive appeal and is consistent, in principle, with tribal perspectives on broodstock management and the use of supplementation in rebuilding natural populations. However, we believe that the resource and the resource beneficiaries are best served by increasing natural population abundance rapidly in the near term,

providing equitable fishery benefits among treaty and non-treaty stakeholders while doing so, and applying PNI guidelines to the greatest extent possible while meeting those management priorities.

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Yes - With Comment

Yes, in part. Comments:

Acclimation Sites: Lower basin acclimation sites have not been identified, or agreed upon.

Mark all smolts: This is a cost issue; it is technically feasible. Full marking would be required if hatchery fish removals to control pHOS become the norm. Marking all smolts will require a revision to US v OR.

Option 1; 200K 100% Integrated Smolt Program with pHOS Control: This option does not meet the current mitigation smolt production target of 400K. Improved ability to estimate run size early and in-season is an on-going management problem; an enlarged marking / tagging program may be needed to accurately estimate run size, manage pHOS at Wenatchee River dams, collect brood, and still assure adequate escapement through use of a sliding scale. Public acceptance of hatchery fish removal beyond a selective fishery is a common problem with integrated programs that still meet mitigation production goals. If run size is not accurately estimated, removal of 80% of WxW hatchery fish could lead to genetic impacts and or substantial under escapement. A sliding scale for brood and adult management has not been developed, however WDFW regional staff supports approaches that lead to a Primary population that meets Primary criteria while achieving near full seeding of available habitat. Control of straying has been the focus and recent priority; long term (4-6 month) acclimation at distributed sites within the basin is a goal, but acclimation sites beyond the planned Chiwawa ponds have not been located.

Option 2; 100K Integrated Program w/pHOS Control + 300K Segregated Stepping Stone Program: All of the Option 1 comments apply except that the mitigation goal of 400K would be met. WDFW regional staff favors Option 2 with a 200K gene bank of WxW crosses, plus 200K of HxW or HxH crosses wherein all smolt releases are scaled to individual spawning area escapement objectives. Suitable new sites with unique water supply have not been located for a stepping stone program component.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

No - Paragraph below - comment for "meeting HSRG Standards"

The current program (alternate plan) has met the abundance criterion (12-year geomean >500), however PNI has been far below the standard. Brood collection has generally met pNOB goals; control of HOS is the primary challenge

"Please describe your alternative program and your reason for developing an alternative program:" The alternate plan (current program) involves transition of smolt rearing from Turtle Rock to new raceways at the Chiwawa Rearing Ponds in late 2009 or early 2010. Other elements of the current program remain in place, including natural and hatchery origin brood collection at Dryden and Tumwater Dams. Volitional smolt releases at Chiwawa would then be trucked to dispersed sites within the basin and released. An inability to reliably estimate run size in-season, and unknown public acceptance of hatchery fish removal at dams after escaping a selective fishery has prevented effective pHOS control in the escapements.

Other Comments

The principal management issues include:

- a) Harvest for pHOS control is currently limited by the incidental take of natural origin fish in selective fisheries. Further manual removal of hatchery fish at dams to meet a restrictive pHOS objective is likely to lead to under-escapement in some years. Because the Wenatchee population is above seven hydro projects, full or near full escapement may be necessary to maximize natural production even though it may reduce productivity below that level provided by a lower escapement level.
- b). WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead

Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

5. Columbia Ringold Hatchery Summer Steelhead

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Currently no funding exists to implement the necessary facility upgrades recommended in order to implement the broodstock change.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation by the HSRG detracts from one of the primary purposes they identify for the program as a genetic reserve.

There appears to be no reason to change broodstocks at this facility especially considering that it would diminish its value as a genetic reserve. The recommendation which would require a significant facility upgrade investment is not fiscally probable in light of Mitchell Act funding issues.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: John A. Easterbrooks

Commenter Email: eastejae@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Transitioning to a locally-adapted broodstock collected at RSRF would require converting a spring-fed, juvenile rearing facility into a full-function hatchery with cold groundwater for incubation. These capital infrastructure improvements are not likely to happen in the foreseeable future because of lack of funding. The Mitchell Act budget is once again threatened with cuts or termination. The source of eggs from Wells Hatchery is secure and the cost of the fry-to-smolt rearing program is reasonable. Our objective is to simply maintain what we currently have in an uncertain budget climate.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

Additional comment to "Yes". Maintain the "status quo"

Note: "No" - default key entry only.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

Other Comments

1) The smolt release for the past two or three years has been volitional with residual fish forced to leave after gradually drawing down the 5-acre pond in mid-May.

2) "The hatchery includes a volunteer trap, and any UCR steelhead entering the trap are transported ~4 miles upstream and released." The preceding discussion of brood collection protocols at Wells Dam (the source of Ringold steelhead eggs) makes this sentence that immediately follows sound like you are still talking about Wells, when in fact you are referring to the Ringold Springs Rearing Facility (RSRF) volunteer trap.

Only wild (adipose intact) UCR steelhead are transported and released upstream. UCR adipose-clip (only) and RSRF AD+RV hatchery fish are recycled downstream to Richland early in the fishing season (Oct.-Nov.) to provide more harvest opportunity.

3.4.6.1 Salmon River Steelhead MPG

1. Salmon River Chamberlain Creek Summer Steelhead A-Run

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy
Commenter Email: ktardy@shoshonebannocktribes.com
Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

2. Salmon River East Fork Salmon Summer Steelhead A-Run

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Constructing a new weir on the East Fork will require a funding source may be difficult to secure.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

This recommendation is in direct disagreement with the court ordered U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers, and although we agree that some changes may be necessary, it has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. However, the NPT will consider the HSRG recommendations in coordination with our co-managers. Changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement.

The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we are not aware of any empirical data that exists to support the PNI theory with respect to Chinook salmon and we do not agree with using preestablished PNI thresholds to make management decisions. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Other Comments

This recommendation does not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that

address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

The Tribes propose to continue with the current program while developing a localized broodstock in the East Fork Salmon River with the potential of integrating native B-run steelhead from the South and Middle Forks. This would continue to provide fishing opportunities for B-run steelhead, eventually eliminate the need for Dworshak National Fish Hatchery (NFH) broodstock, increase survival over time, reduce potential straying rates, and provide a mechanism for conservation of native steelhead stocks. In the interim, there needs to be increased monitor and evaluation activities to quantify B-run steelhead harvest benefits relative to A-run steelhead.

3. Salmon River Lemhi River Summer Steelhead A-Run

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

4. Salmon River Little Salmon Summer Steelhead A-Run

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Paul Abbott

Commenter Email: pabbott@idahopower.com

Commenter Organization: Idaho Power Company

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Idaho Power Company has no resource management authority and therefore declines to comment on whether or not the HSRG plan is technically feasible or should be implemented as proposed. Idaho Power Company will continue to provide fish hatchery facilities, adult trapping facilities, fish transportation equipment and operating funds necessary to meet fish production levels as required under current and future FERC operating licenses for the Hells Canyon Dam Complex. Idaho Power supports the Idaho Department of Fish and Game in their operation of these facilities and implementation of HSRG goals.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Idaho Power Company has no resource management authority and therefore declines to comment on whether or not the HSRG plan is technically feasible or should be implemented as proposed. Idaho Power Company will continue to provide fish hatchery facilities, adult trapping facilities, fish transportation equipment and operating funds necessary to meet fish production levels as required under current and future FERC operating licenses for the Hells Canyon Dam Complex. Idaho Power supports the Idaho Department of Fish and Game in their operation of these facilities and implementation of HSRG goals.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Idaho Power wishes to make the following clarifications to the HSRG report and recommendations.

Section 2.2 Current Conditions : Item 2 reads; This is a segregated harvest program that releases 445,000 yearling summer steelhead to the Little Salmon, Stinky Springs and Hazard Creek annually.

Idaho Power suggests this statement be modified to clarify that smolts are not actually released into Stinky Springs and Hazard Creek. Rather, smolts are released directly into the Little Salmon River at or near the mouths of these reference streams.

Section 2.2 Current Conditions: Item 2 reads; Broodstock are collected at the Pahsimeroi Hatchery weir or at Oxbow Hatchery.

Idaho Power suggests this sentence be modified to state; Broodstock are collected at the Pahsimeroi Hatchery weir or at the Hells Canyon Trap located downstream of the Hells Canyon Dam.

Section 2.2 Current Conditions: Item 2 reads; Eyed-eggs are then transferred to either the Niagara Springs Hatchery or Hagerman National Hatchery for incubation and juvenile rearing.

Idaho Power suggests this sentence be modified to state; Eyed-eggs and/or unfed swim-up fry are then transferred to either the Niagara Springs Hatchery or Hagerman National Hatchery for incubation and juvenile rearing.

Section 3.2 HSRG Observations/Recommendations: paragraph 2 in the yellow box reads; Final incubation and juvenile rearing for A-run segregated programs occurs at the Pahsimeroi and Niagara Springs hatcheries and at the Hagerman National Fish Hatchery.

Idaho Power wishes to clarify that no juvenile rearing of A-run steelhead occurs at Pahsimeroi Hatchery. We suggest this statement be modified to reflect this point.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Salmon River Lower Middle Fork Summer Steelhead B-Run

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations. Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production and a DIDSON to determine adult returns and run-timing in Camas and Loon Creeks.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

6. Salmon River North Fork Salmon Summer Steelhead A-Run

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Columbia River Hatchery Reform Project
Final Systemwide Report - Appendix F
3.4.6.1 Salmon River Steelhead MPG

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Do not include the description of the SBT SSI program in this section as supplementation does not directly occur in the North Fork; however, leave the statement that the Tribes are conducting the program in near-by watersheds.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production and a DIDSON to determine adult returns and run-timing. Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Tribes rear HOR eyed eggs in Panther Creek.

7. Salmon River Pahsimeroi River Summer Steelhead A-Run

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM supports utilizing Pahsimeroi broodstock for releases between the Pahsimeroi and Lemhi rivers.

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Actual implementation responsibilities for Pahsimeroi broodstock lie with Idaho Department of Fish and Game.L

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations

that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Abbott

Commenter Email: pabbott@idahopower.com

Commenter Organization: Idaho Power Company

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Idaho Power Company has no resource management authority and therefore declines to comment on whether or not the HSRG plan is technically feasible or should be implemented as proposed. Idaho Power Company will continue to provide fish hatchery facilities, adult trapping facilities, fish transportation equipment and operating funds necessary to meet fish production levels as required under current and future FERC operating licenses for the Hells Canyon Dam Complex. Idaho Power supports the Idaho Department of Fish and Game in their operation of these facilities and implementation of HSRG goals.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Idaho Power Company has no resource management authority and therefore declines to comment on whether or not the HSRG plan is technically feasible or should be implemented as proposed. Idaho Power Company will continue to provide fish hatchery facilities, adult trapping facilities, fish transportation equipment and operating funds necessary to meet fish production levels as required under current and future FERC operating licenses for the Hells Canyon Dam Complex. Idaho Power supports the Idaho Department of Fish and Game in their operation of these facilities and implementation of HSRG goals.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Idaho Power wishes to make the following clarification to the HSRG report and recommendations.

Section 3.2 HSRG Observations/Recommendations: paragraph 3 in the yellow box reads; Idaho Power Company production is reared primarily at the Niagara Springs Fish Hatchery.

Idaho Power suggests this statement be modified to state; Idaho Power Company production is reared exclusively at the Niagara Springs Fish Hatchery.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

There are two values listed for 10-yr geometric means - 73 and 456. Which value is correct?

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

8. Salmon River Panther Creek Summer Steelhead A-Run

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Eggs have been planted in all those streams; however, in 2009 eyed-eggs from Sawtooth and Pahsimeroi will only be reared in Yankee Fork, Indian Creek, and Panther Creek.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations. Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production and a DIDSON to determine adult returns and run-timing. Under the SBT Fish Accord with BPA, Panther Creek is identified for re-introduction of chinook salmon and increased steelhead supplementation activities.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Egg-box program should say Streamside Incubator (SSI) program. "Hatch boxes" should say Upwellers.

9. Salmon River Secesh River Summer Steelhead B-Run

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

10. Salmon River South Fork Summer Steelhead B-Run

Commenter Info

Commenter Name: Paul Kline

Columbia River Hatchery Reform Project
Final Systemwide Report - Appendix F
3.4.6.1 Salmon River Steelhead MPG

Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: bekyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

11. Salmon River Upper Middle Fork Summer Steelhead B-Run

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Increased monitoring and evaluation is necessary to eliminate gaps and "modeling estimations" within ICTRT evaluations. Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production and a DIDSON to determine adult returns and run-timing in Bear Valley Creek.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

12. Salmon River Upper Salmon Summer Steelhead A-Run

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM supports discontinuation of Dworshak B stock releases in the upper Salmon with a transition to local stock. We also support the marking recommendations.

The NPT agrees there is a need to improve the database by collecting more information regarding Snake River steelhead.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

These recommendations do not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

48% (not 56%) YFSR smolts are adipose fin clipped (SR AOP 08). Slate Creek release is 100,000 not 90,000 (SR AOP 08). Yankee Fork release is 330,000 not 300,000 (SR AOP 08). Eggs have been planted in all those streams; however, in 2009 eyed-eggs from Sawtooth and Pahsimeroi will only be reared in Yankee Fork, Indian Creek, and Panther Creek.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Tribes believe increased monitoring activities should include the use of a screw trap to monitor juvenile production out of Yankee Fork.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Tribes purpose the development of a localized broodstock in YF through integration of Sawtooth hatchery-origin and YF natural-origin adults. This program would continue to provide fishing opportunities for Tribal and recreational fisheries as well as provide a means for conservation of native stocks of steelhead. The Columbia Basin Fish Accord with the Shoshone-Bannock Tribes identifies the construction of an adult trapping facility in the YF and a hatchery at Crystal Springs to promote development of localized broodstock and provide acclimation for juveniles and adult holding and spawning.

Other Comments

Egg-box program should say Streamside Incubator (SSI) program. "Hatch boxes" should say Upwellers.

3.4.6.2 Clearwater River Steelhead MPG

1. Lochsa Summer Steelhead (B-run)

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

2. Lolo Summer Steelhead (A+B-run)

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

There is currently no weir or feasible option to collect natural-origin (or any) adult steelhead in Lolo Creek to initiate a local stock steelhead program.

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding is not available to design and construct a weir on Lolo Creek capable of fishing for steelhead. In addition, funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers and has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. However, as part of the Management Agreement, co-managers "support collecting adults returning to South Fork Clearwater River and Lolo Creek with infrastructure development, funding support, and HGMPs to accomplish broodstock transition to locally returning adults by broodyear 2010. Parties commit to further discussion of supplementation options and release locations in the South Fork of the Clearwater". The NPT will consider the HSRG recommendations in coordination with our co-managers. Changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number or a pHOS value. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we do not agree with using preestablished PNI thresholds to make management decisions.

Other Comments

The HSRG estimates of the number of fish straying into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

3. Lower Clearwater Summer Steelhead (A-run) (Potlatch)

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

These recommendations are confusing. The natural population being evaluated is the lower Clearwater (Potlatch, Big Canyon, Lapwai, etc.) A strain steelhead. The hatchery release being evaluated is the 300,000 B strain release at Kooskia. It would seem that a release of 1.2 million B steelhead from Dworshak Hatchery (much closer to the lower Clearwater tributaries) would be a larger concern - yet it isn't even mentioned. Co-managers do not outplant B steelhead from Kooskia in lower Clearwater tributaries.

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See explanation above. The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers and has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management

Agreement. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we do not agree with using preestablished PNI thresholds to make management decisions.

Other Comments

The HSRG estimates of the number of fish straying into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

4. North Fork Clearwater Summer Steelhead (B-run) (Dworshak National Fish Hatchery)

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

An improved water supply for Dworshak Hatchery is very much needed!

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Despite the desperate need for an improved water supply obtaining funding to accomplish design and construction is, and will be, a sizeable challenge.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

5. Selway Summer Steelhead (B-run)

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays

should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

6. South Fork Clearwater Summer Steelhead (B-run)

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The co-managers have not yet evaluated the technical feasibility of creating an integrated and segregated steelhead program for the South Fork Clearwater River. The logistics of adult trapping, hauling, holding, spawning, incubation, rearing, marking, and release strategies will have to be examined given existing facilities.

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

This recommendation is in direct disagreement with the court ordered U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers and has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. However, as part of the Management Agreement, co-managers "support collecting adults returning to South Fork Clearwater River and Lolo Creek with infrastructure development, funding support, and HGMPs to accomplish broodstock transition to locally returning adults by broodyear 2010. Parties commit to further discussion of supplementation options and release locations in the South Fork of the Clearwater". The NPT will consider the HSRG recommendations in coordination with our co-managers. However, changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number or a pHOS value. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we do not agree with using preestablished PNI thresholds to make management decisions.

Other Comments

The HSRG estimates of the number of fish straying into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations. This recommendation does not address what changes could be made in the program to achieve the Lower Snake River Compensation Plan adult mitigation responsibility.

Commenter Info

Commenter Name: Paul Kline
Commenter Email: pkline@idfg.idaho.gov
Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
Yes

Implementation Plan

Do you plan to implement the recommendations as presented?
Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

3.4.6.3 Grande Ronde Steelhead MPG

1. Grande Ronde-Lower Grande Ronde Summer Steelhead

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Implementing these recommendations would require discussion and coordination among co-managers.

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Brian Zimmerman
Commenter Email: brianzimmerman@ctuir.com
Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Generally yes - do not agree with complete discontinuation of hatchery releases above the weir.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The parties to US v. OR have agreed to develop a steelhead management plan for this basin to be initiated with brood year 2010.

Commenter Info

Commenter Name: Glen Mendel
Commenter Email: mendegwm@dfw.wa.gov
Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Additional comments: Yes in part

It is feasible to discontinue passing hatchery fish up-stream of the existing hatchery collection rack on Cottonwood Creek.

The feasibility of various alternative uses for surplus hatchery fish, specifically food bank use, has been reviewed. Due to the remote location of the trap facility and logistics in handling and storing food quality surplus fish, this option was not practical.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Yes - In Part. WDFW will to examine alternatives to passing hatchery fish upstream of the hatchery collection facility and for improvement of our monitoring efforts. New funding will need to be obtained for increased monitoring of adult returns and the effects of this program on ESA listed steelhead. The WA Fish and Wildlife Commission passed regulations within the past three years to increase daily bag limits on hatchery steelhead from 2 to now 3 fish per day in SE WA, including the Grande Ronde River. The WA F&W Commission discontinued a 30-fish annual harvest limit regulation on hatchery steelhead in 2008. Increasing daily bag limits and annual harvest opportunity may help reduce excess hatchery fish. Alternative uses for surplus fish has been evaluated.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

2nd Yes - In Part:

WDFW will examine the SARs and adult return numbers and determine if smolts releases numbers should be reduced further.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

Other Comments

1. at end of paragr. in section 2.2 please add "In recent years, a portion of those have also been given a PIT tag to better estimate full returns to the Snake River Basin." The second bullet in this section may need to be changed to 118 out of basin stays.

2. Grande Ronde-Joseph Creek Summer Steelhead

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations

that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
Yes

Implementation Plan

Do you plan to implement the recommendations as presented?
Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?
No

Other Comments

ODFW would support population classification of Primary and reduce program size. Our recommendation would be 65,000 smolts, primarily for operational reasons and existing infrastructure.

3. Lyons Ferry Summer Steelhead (A-run)

Commenter Info

Commenter Name: Rebecca Johnson
Commenter Email: beckyj@nezperce.org
Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?
No

If no, please describe why:

The NPT DFRM agrees with the recommendation to identify the disposition of unaccounted for steelhead from the Lyons Ferry release. However, attempting to "remove" these fish may prove difficult, if not impossible. Operating temporary weirs in tributaries with "nearby natural populations" is not as easy as it sounds during the spring run off season. In addition, funding for design, construction, and operation of temporary weirs is currently not available.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Implementing these recommendations would require discussion and coordination among co-managers.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Not sure of the feasibility of weiring off all the tributaries where these fish could show up.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Generally yes but not sure what the recommendation is if local brood programs are implemented in the surrounding basins that currently use LFH stock. Remain the same size as a segregated harvest program or be further reduced as has occurred in the past?

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Glen Mendel

Commenter Email: mendegwm@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additional comments to "Yes" above.

Yes - In Part

Additional review of harvest data via sport harvest catch record card (CRC) information in cooperation with regional co-managers could be done to better determine the disposition of returning adult steelhead. Additionally, WDFW will attempt to improve accounting for adult returns and examine straying or unaccounted for returns by increasing use and evaluation of PIT tags, monitoring and possible removal at Lower Granite Dam using the sort by code system in the trap. These efforts may require additional funding.

No - In Part

1. Complete termination of the use of this stock and release location(s) would greatly reduce achievement of the LSRCP mitigation goal for providing harvest (see section 3.2 observations about the significant contribution to recreational harvest). It also assumes that the Tucannon and Touchet, and potential Walla Walla endemic programs are excelling and successful. So far endemic steelhead programs in the Tucannon and Touchet have not been as successful as hoped for in meeting their goals.

2. The HSRG review is one component of expected reviews for steelhead hatchery programs in SE WA. The USFWS hatchery review for LSRCP facilities begins in early 2009. WDFW will be continuing implementation of the Department's Statewide

Steelhead Management Plan through regional (SE WA) steelhead management plan development with co-managers.

3. The recommendation to increase trapping at LFH would remove more hatchery fish, but would also include other steelhead stocks and many fish that would have to be handled / processed and released back to the Snake River. Removal of hatchery fish beyond brood stock needs at the trap would likely decrease harvest and achievement of LSRCMP mitigation goals.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

No alternate plan at this time, but alternatives will be explored over the next year or so for the other two planning processes in 2009.

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

Other Comments

The map on the cover of the HSRG Recommendations report is somewhat mis-leading. It's recommended that the map shows Lyons Ferry Hatchery and Tucannon Hatchery, and those portions of the Snake River and lower Tucannon River where releases occur.

5. Grande Ronde-Wallowa Summer Steelhead

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Surprised with the documented straying issues in the mid Columbia associated with this program that there is no recommendation into reducing program size.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: bekyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Guy Chilton
Commenter Email: guy.s.chilton@state.or.us
Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

ODFW would support population classification of Primary and reduce program size. Our recommendation would be 65,000 smolts, primarily for operational reasons and existing infrastructure.

4. Upper Grande Ronde Summer Steelhead

Commenter Info

Commenter Name: Brian Zimmerman
Commenter Email: brianzimmerman@ctuir.com
Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

ODFW would support population classification of Primary and reduce program size. Our recommendation would be 65,000 smolts, primarily for operational reasons and existing infrastructure.

3.4.6.4 Imnaha Steelhead MPG

1. Imnaha River Summer Steelhead Population (A-Run)

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Funding to implement HSRG recommendations to determine abundance and productivity estimates for Big Sheep Creek is not available. The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternate plan.

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is currently not readily available.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers and has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT will consider the HSRG recommendations in coordination with our co-managers. However, changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The AHA model output is not meant to be predictive and should not be

portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we do not agree with using preestablished PNI thresholds to make management decisions.

Other Comments

The HSRG estimates of the number of fish “straying” into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

CTUIR does not agree with the PNI as presented and does not feel that there is scientific data to support the specific values for primary and contributing populations.

CTUIR feels that as long as hatchery fish are of the appropriate stock that they can make a valuable contribution in seeding underutilized habitat and should not be necessarily limited by a finite PNI or PHOS value.

CTUIR generally agrees with the stepping stone approach for this population but not the removal recommendation.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program being implemented has been developed and agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Commenter Info

Commenter Name: Guy Chilton

Commenter Email: guy.s.chilton@state.or.us

Commenter Organization: ODFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Although many of the principles are currently being implemented the higher PNI and removing hatchery adults from selected spawning areas is not supported by co-managers. Changes of this magnitude would be predicated on US v Oregon support.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

We are currently operating under these guidelines: Steelhead smolts production will range from 215,000 to 330,000 smolts to provide a return of 2,000 adults to/above Ice Harbor Dam for harvest, broodstock, and natural escapement.

Escapement goals:

Big Sheep -500 adults
Little Sheep -250 adults

The base production program consists:

Little Sheep-165,000 ad clipped smolts, 25,000LVCWT and 9,300PIT
Big Sheep-50,000 ad clipped smolts, 3,500 PIT

Sliding scale production levels:

Increase production to meet adult return goal up to 330,000 smolts

If broodstock and escapement goals are not attained at full production (330,000 smolts), unclipped smolts can be released

Weir Management guidelines

Big Sheep- Big Sheep escapement would be estimated from PIT adults crossing Lower Granite Dam. Goal is 500 fish escapement

Little Sheep-Goal of 250 fish escapement

< 100 natural adults, no management of the proportion of hatchery/natural fraction (PNI) to meet 250 fish natural escapement.

101-150 natural adults, manage the PNI between 36-48% natural fish escapement.

151-200 natural adults, manage the PNI between 48-60% natural fish escapement. Total release up to 250.

201-250 natural adults, manage the PNI at 60-72% or less hatchery to wild. Total release up to 250

> 251 natural adults, manage the PNI at >72% wild adults, no limit of wild fish above the weir.

Broodstock Management guidelines

Approximately 126 adults are required to produce the base program of 215,000 smolts. The guideline for the proportion of natural fish in the broodstock is as follows:

At less than or equal to 100 natural returns, use 10% of natural run for broodstock

At greater than 100 natural returns, use 10 natural fish plus 40% of the natural run greater than 100 for broodstock (examples below).

Examples:

100 wild - 10 natural adults for broodstock

150 wild - 30 natural adults

200 wild - 50 natural adults

250 wild - 70 natural adults

300 wild - 90 natural adults

Surplus Adults: Adult returns to Little Sheep can be transferred to Big Sheep to meet escapement goal, given to the Tribes for C/S, used for nutrient enhancement (after Fish Pathogen screening), given to local food banks, or placed in the landfill. Placement of

steelhead carcasses can occur in Big Sheep (RM 25-34), Lick Creek (RM 0.0 - 5.0),
Imnaha (RM 42 -67) from August through October under ODFW current 2006-07 MOA.
Carcasses must test negative for: viruses, Mc (Whirling disease), and BKD (<0.2 OD
titer).

3.4.6.5 Tucannon-Asotin Steelhead MPG

1. Asotin Creek Summer Steelhead (A-Run)

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The HSRG does not provide technical recommendations on "methods" that will be "required to control hatchery strays".

The NPT DFRM agrees that there is a need to collect and develop an information base for Snake River steelhead status and trends.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Funding for monitoring and evaluation status and trend of Snake River steelhead populations is difficult to obtain. Implementation of "controlling hatchery strays", even if agreed to by co-managers, would require a substantial amount of funding.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

If yes, does it meet the HSRG standards for this population designation?

If yes, please describe your alternative program and your reason for developing an alternative program:

The HSRG estimates of the number of fish straying into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Other Comments

The map is not accurate and does not include the entire Asotin Population (Couse, Tenmile, Alpowa, Steptoe and Almota Creeks are not included). There is only one dam on Asotin Creek (the upper most one on the map). Table 1 is for steelhead, not spring Chinook. The AHA model grossly underestimates the abundance of natural adults currently spawning in Asotin Creek. WDFW operates an adult weir on Asotin Creek which has documented 615 natural adults in 2005, 514 natural adults in 2006, 289 natural adults in 2007, 309 natural adults in 2008. This empirical data is for only 29 miles in Asotin Creek and does not include Couse, Tenmile, Alpowa, Almota, and Steptoe.

Commenter Info

Commenter Name: Glen Mendel

Commenter Email: mendegwm@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Comments added to "Yes".

The HSRG recommendation to promote control of hatchery strays entering the Asotin Creek is technically feasible. Some control of hatchery steelhead intercepted at existing weir facilities is being undertaken. Additional funding support to fully implement the HSRG recommendation would be needed. The current estimate of NOS is 145, which is well below empirical data estimates for just a portion of Asotin Creek. This population includes all of the Asotin Creek Basin, Alpowa, Almota, Steptoe, Tenmile, Couse creeks. These other basins are not included in the modeling.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Comments added to "Yes".

WDFW hopes to improve monitoring in other parts of this population, and hopefully removal of hatchery strays. This will require significantly more funding. The new Intensively Monitored Watershed monitoring implementation in Asotin Creek should contribute to our knowledge of steelhead movements within Asotin Creek and the

potential for hatchery influence, as well as the effects of habitat improvements on wild steelhead abundance and productivity.

The HSRG note the elevated incidence of stray hatchery fish entering Asotin Creek. These fish many come from downriver stocks or releases, however no real solution has been offered regarding steelhead, which stray above Lower Granite Dam and subsequently are hindered in their ability to return downstream.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery steelhead programs to meet HSRG standards for PNI and gene flow rates.

2. Tucannon River Summer Steelhead A-Run

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

See alternate plan.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

No

If yes, please describe your alternative program and your reason for developing an alternative program:

The current program was developed in coordination with our co-managers and has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement. The NPT will consider the HSRG recommendations in coordination with our co-managers. However, changes to this production program must occur through the U.S. vs. Oregon forum as specified in the U.S. vs. Oregon 2008-2017 Management Agreement. The AHA model output is not meant to be predictive and should not be portrayed to represent absolute numbers. The NPT DFRM supports the concept behind PNI theory (incorporating natural origin fish into hatchery broodstock and managing hatchery origin fish on the spawning grounds). However, we do not agree with using preestablished PNI thresholds to make management decisions. The NPT DFRM does not agree with removing hatchery-origin fish that are of the appropriate stock from the spawning grounds as recommended. We believe they are a valuable contribution to the resource and should not be managed by a finite PNI number or a PHOS value.

Other Comments

The HSRG estimates of the number of fish straying into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

Commenter Info

Commenter Name: Brian Zimmerman

Commenter Email: brianzimmerman@ctuir.com

Commenter Organization: CTUIR

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

The recommendation is in direct disagreement with production actions agreed to by basin co-managers through the legally binding US v. OR Management Agreement.

Although we agree with the recommendation to discontinue LFH stock in the basin, we do not agree with the recommendation to maintain the endemic brood program at the current size.

There appear to be limited gains in productivity and lower NOS from the HSRG recommendation with substantial harvest reductions.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The parties to US v. OR have agreed to develop a steelhead management plan for this basin to be initiated with brood year 2010.

Is there any scientific basis for why a sliding scale is recommended here and not for other STS populations? The Tucannon seems to be the poster boy for implementation of sliding scale broodstock/escapement management! What makes the Tucannon so different that sliding scales are appropriate for all species in this basin and not others?

Considering the large amount of straying from Tucannon STS, why isn't there any recommendation to assess the impacts to surrounding tribes/pops like those in the Lyons Ferry recommendations?

Commenter Info

Commenter Name: Glen Mendel

Commenter Email: mendegwm@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above.

Lyons Ferry Stock steelhead releases could be discontinued in the Tucannon River. There would be impacts to mitigation obligations associated with this action as the

existing Tucannon endemic stock program is not capable of providing sufficient fish numbers to meet Lower Snake River Compensation Plan mitigation program needs. To date the endemic program in the Tucannon has not been very successful at meeting its goals. Additionally, over utilization of natural origin brood stock to support hatchery supplementation could negatively impact wild population demographics.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Additional comment to "Yes" above.

Yes - partially. Managers will continue to operate the current endemic program (50,000 smolt release, with the intent of utilizing a pNOB of 100% went possible). Recommendations to develop a variable sliding abundance scale for managing both pNOB and pHOS relative to NOR, will also be pursued. Please see additional comments section for additional notes.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

Yes

If yes, does it meet the HSRG standards for this population designation?

Yes

If yes, please describe your alternative program and your reason for developing an alternative program:

Additional comment to "Yes" above.

Yes - in Part.

1. WDFW will work with the HSRG recommendations as it goes through additional pending rounds of planning processes (USFWS/LSRCP and WDFW Statewide Steelhead Management Plan regional planning), and after further evaluation of the Tucannon endemic program.
2. Use of the sliding scale will require a much more effective weir facility to remove hatchery fish and enumerate returning adults. Without such a facility the sliding scale approach cannot be implemented. Currently, WDFW is not able to accurately estimate adult returns or their composition. This need, and associated support funding, will be pursued through LSRCP and BPA via consultation associated with implementing the new Federal Hydro-system BIOP for the Columbia / Snake River system.

Other Comments

WDFW is currently in the process of developing watershed specific plans to implement the Statewide Steelhead Management Plan. Once the plans are developed, this may affect the steelhead programs in this watershed. The Statewide Steelhead Management Plan does require hatchery programs to meet HSRG standards for PNI and gene flow rates.

3.4.6.6 Hells Canyon Steelhead MPG

1. Snake Hells Canyon Summer Steelhead (A-run) (Oxbow Hatchery)

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The HSRG estimates of the number of fish straying into each population must be regarded cautiously. The estimates are unsubstantiated and are based on assumptions which have not been tested. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population.

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

The 1/3 "sharing" scenario of hatchery steelhead returning to the Oxbow trap that are surplus to broodstock needs was developed by Idaho. This scenario has been implemented the past several years despite NPT objections. The NPT DFRM position is that sharing of these fish should be consistent with the 50:50 sharing principle. The HSRG estimates of the number of fish "straying" into each population are unsubstantiated by empirical data. Prior to developing population-level recommendations that address strays within a population, the extent of straying and origin of any strays should be carefully reviewed for each population. Co-managers in the Snake Basin have not designated populations as Primary, Contributing, or Stabilizing and the NPT DFRM is not aware of any scientific information that exists to support the HSRG designations.

3.5 SOCKEYE

3.5.1 Upper Columbia River Sockeye ESU

1. Wenatchee Sockeye

Commenter Info

Commenter Name: Jeff Korth

Commenter Email: korthjwk@dfw.wa.gov

Commenter Organization: WDFW

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

Yes - With Comment

1) Monitor Relationship Between Hatchery and Natural Replacement Rates: HRR calculations include lake outlet smolt estimates which are subject to errors caused by predation on mark/recovery fish for trap calibration to estimate smolt emigration. NRR is also challenging since smolt trap efficiencies are very low. Monitoring will continue, and ways to improve trap efficiencies are continually sought, but to date NR rates far exceed HR rates. WDFW regional staff believes more in-depth assessment of potential natural fry production, in-lake survival, and smolt production is needed to define the reason(s) HRR is lower than NRR. The true limitations on natural production (Fall freshets? In-lake predation?) have not been clearly identified, but proposed studies have not been funded. Efforts are also underway to improve assessment of adult escapement and estimation of egg deposition.

2) Improve Methods and Techniques Used to Assess Juvenile Emigration and Adult Escapement: WDFW supports current PUD-sponsored efforts to improve adult enumeration. Improved methodologies to assess emigration are being discussed in the HCP process and will be implemented when funding is available.

3) Assess Needed Program Changes and Need for Continued Hatchery Augmentation: WDFW regional staff supports the call for increased assessment of standard measures in

sockeye management, particularly evaluation of fry production capacity and rearing lake smolt production capability.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

Financial and other resources are needed to implement other needed studies and evaluations.

Commenter Info

Commenter Name: Steven Hays

Commenter Email: steve.hays@chelanpud.org

Commenter Organization: Chelan County Public Utility District

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

Chelan County PUD's hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD's hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Implementation Plan

Do you plan to implement the recommendations as presented?

No

If no, please describe why:

Chelan County PUD's hatchery programs are managed collaboratively by the HCP Hatchery Committee in order to meet the requirements of the Rock Island and Rocky Reach Habitat Conservation Plans. Chelan County PUD has previously submitted comments on this population report, submitted jointly with Grant County PUD and Douglas County PUD. The HCP Hatchery Committee will consider the HSRG recommendations, as appropriate, when making decisions regarding the operations of Chelan PUD's hatchery programs. HSRG recommendations may or may not be implemented, depending on the consensus of the HCP Hatchery Committee.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

3.5.2 Snake River Sockeye ESU

1. Salmon Redfish Sockeye

Commenter Info

Commenter Name: Paul Kline

Commenter Email: pkline@idfg.idaho.gov

Commenter Organization: idfg

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

IDFG has prioritized expanding smolt production for the program and is actively attempting to do so. The feasibility of trapping and transporting adults from Lower Granite Dam to terminal areas is being investigated. Implementing a downstream program to augment production will be discussed but remains a lower priority than the above two recommendations.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Rebecca Johnson

Commenter Email: beckyj@nezperce.org

Commenter Organization: Nez Perce Tribe

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

Yes

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

The NPT supports the expansion of the Redfish Lake sockeye program - which was developed in coordination with co-managers using best available science and information. It has been agreed to for a 10 year period through the U.S. vs. Oregon 2008-2017 Management Agreement.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Commenter Info

Commenter Name: Kurt Tardy

Commenter Email: ktardy@shoshonebannocktribes.com

Commenter Organization: Shoshone Bannock Tribes

Technical Feasibility

Do you agree with the technical feasibility of the recommendations as presented?

No

If no, please describe why:

The Shoshone-Bannock Tribes petitioned to have Sockeye Salmon located in the Salmon River listed under the ESA in 1991. Evermann and Bjornn documented evidence of S.R. sockeye in Pettit and Yellowbelly Lakes.

Implementation Plan

Do you plan to implement the recommendations as presented?

Yes

If no, please describe why:

However, the Tribes disagree with the recommendation for downstream release and capture because it has huge potential for maladaptive genetic impacts that could decrease locally adapted productivity levels.

Alternate Plan

Have you developed an alternate recommendation you plan to implement?

No

Other Comments

CB Fish Accord also signed by the Shoshone Bannock Tribes.