

State, Federal and Tribal Fishery Agencies Joint Technical Staff

Columbia River Inter-Tribal Fish Commission
Idaho Department of Fish and Game
Nez Perce Tribe
Oregon Department of Fish and Wildlife
Shoshone-Bannock Tribes
US Fish and Wildlife Service
Washington Department of Fish and Wildlife

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Brian Brown
NOAA Fisheries
525 NE Oregon St., Suite 420
Portland, OR 97232

Witt Anderson, COE
NWD Corps of Engineers
PO Box 2870
Portland, OR 97208-2870

Dear Mr. Brown and Mr. Anderson:

The technical staffs of the state, federal and tribal fishery agencies participate as co-managers in the discussions of implementation of Biological Opinion hydrosystem operations to reduce the impacts of FCRPS on migrating salmon. The purpose of this correspondence is to advise the federal decision agencies, in our role as co-managers of the fishery resources, that the present policy of maximization of transportation of fall chinook should be reconsidered for 2004 and beyond. The available information indicates that an alternative management strategy of spread-the-risk should be implemented.

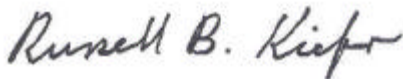
The NOAA Biological Opinion contemplates the eventuality that the transportation of juvenile salmon may be modified on the basis of information gathered during the implementation of the Biological Opinion. Action 51 in the NOAA Opinion states that, if results of Snake River studies indicate that survival of juvenile salmon and steelhead collected and transported during any segment of the juvenile migration is no better than the survival of juvenile salmon that migrate in river, the operating agencies in coordination with NOAA shall identify and implement appropriate measures to optimize in-river passage at the collector dams during those periods.

Recent analysis and research summaries have been made available to the region indicating that the present operation of maximizing transportation of fall chinook should be modified to implement a spread-the-risk approach similar to that in place for spring migrants. This new information has become available since the development of the 2004 Fish Passage Plan and therefore warrants re-evaluation of this plan. In the draft technical memorandum entitled "Effects of the Federal Columbia River Power System on Salmon Populations" (May 6, 2004),


NOAA Fisheries reviewed the available information regarding the transportation of fall chinook, and observed that for juvenile fish detected prior to September, in four out of six years the combined bypassed group exceeded the smolt-to-adult return rate of the combined transported group. NOAA concluded that for subyearling chinook salmon, transportation appears to neither greatly harm nor help the fish and thus a combination of transportation and providing good passage conditions for fish not collected and transported is consistent with a spread-the-risk strategy, which would be appropriate until more is known. Further, in a draft report summarizing and analyzing transportation results prepared for the Corps of Engineers by Anderson et al. (May 21, 2004), the authors conclude that for fall chinook the evidence suggests that non-detected fish return at higher rates than transported fish. In addition, several analyses were submitted to the action agencies in deliberations of the 2004 summer spill program, which include consideration of the fall chinook transportation program. The Bouwes (2004) analysis of the summer spill proposed actions included a SIMPAS analysis, which concluded that in-river migrants had higher smolt-to-adult return rates than transported fall chinook. The Fish Passage Center, in a memorandum response to a data request, conducted a preliminary analysis (April 6, 2004) of the smolt-to-adult return rates of transported fall chinook and concluded that the assumed benefits of transportation of fall chinook were overestimated and not supported by the available data.

To conclude, we urge the federal agencies, on the basis of the available scientific information to reconsider the present policy of maximizing transportation of fall chinook juveniles in 2004 and beyond. The available information indicates that an alternative management strategy of spread-the-risk should be implemented through the provision of optimum in-river migration conditions.

Sincerely,



Russ Kiefer, IDFG



Tom Lorz, CRITFC



Dave Statler, NPT



Rod Woodin, WDFW



Ron Boyce, ODFW



Dave Wills, USFWS



Keith Kutchins, SBT