

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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RE: NOAA Fisheries Request to Sample scales on PIT Tagged Fall Chinook Adults

This letter is in response to your request that the Fish Passage Advisory Committee (FPAC) endorse a proposal from NOAA Fisheries to collect scale samples on PIT-tagged adult fall chinook at Lower Granite Dam in 2004. FPAC has discussed this proposal, but due to both scientific and logistic reasons, we recommend that the proposed work be delayed until fall of 2005. The purpose of this letter is to document our concerns regarding the proposal and to clear up any confusion regarding FPAC's response to the proposal.

Our primary concern is the lack of well-defined objectives and hypotheses that the proposed research would aim to address. Without specific objectives, it is impossible to determine whether the proposed research is capable of answering the relevant biological or management research questions. Our recommendation of delaying the work until 2005 will allow additional time for the development of scientific objectives, which will benefit the proposed research by reducing controversy and conflict in the application of the research results to

significant hydrosystem management decisions, as well as potential impacts on other fishery management activities such as run reconstruction data collection by the state and tribal fishery co-managers. Our recommendation for development of specific analytical methods and scientific objectives is based on our experience over the past years that this will significantly improve the proposed research and will enhance the application and value of the resulting data to the region. In addition, the development of specific analytical methods and scientific objectives will minimize the potential of misapplication or erroneous application of results. The following specific comments are intended to provide constructive input to improve the resulting data and application of results of the proposed work. We strongly recommend delay of the proposed work until these recommendations can be incorporated into the proposal.

- ?? An analytical approach or a hypothesis to be tested should be clearly identified. This will establish the management application and context for the results.
- ?? Currently, under the auspices of the US v Oregon agreement a scale sampling and mark recapture program is being implemented in order to perform run-reconstruction. Clarity would be added to the NOAA proposal by addressing the current sampling and how NOAA can utilize the data presently collected and how the additional proposed data collection will add to or compliment the present data collection effort. The present data collection may have utility to the NOAA effort.
- ?? The proposal would benefit from an explanation on how this proposal will aid the interpretation of the observed low T:I ratios or how the results could inform management decisions regarding the transportation of fall chinook.
- ?? This proposal could impact other regionally approved studies.
- ?? The proposal would benefit by including an explanation on how life history determinations will be validated to ensure their accuracy.
- ?? We have concerns regarding the potential confounding effects of Lower Granite operations and unit testing on adult passage and sampling. Lower Granite operations may cause periodic increase in adult passage on some days, which potentially could increase incidental catch.
- ?? Our recommendation to delay the adult sampling until 2005 reflects the fact that run timing information indicates that 50% of the fall chinook adults have already passed LGR. This will limit the utility of a data set collected this year.

To conclude, we believe that the adult scale sampling proposed will benefit from additional planning and technical consideration, specifically the identification of study objectives and proposed analytical methods. Our recommended delay of sampling to facilitate the refinement of the proposal will not adversely affect the long-term data set or its application since the data set proposed for collection in 2004 can only be fractional given the status of the adult migration. We have similar concerns regarding the NOAA proposal to collect length data on transported adult steelhead. We look forward to further discussions with NOAA as the proposals and analytical methods are developed.

Sincerely, STFA



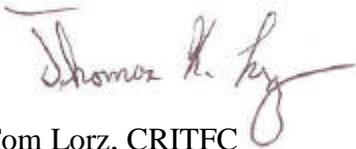
Dave Statler, NPT



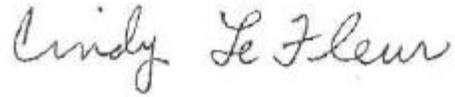
Ron Boyce, ODFW



Keith Kutchins, SBT



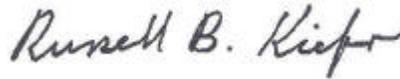
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