

State, Federal and Tribal Fishery Agencies Joint Technical Staff Letter

*Columbia River Inter-Tribal Fish Commission
Idaho Fish and Game
Oregon Department of Fish and Wildlife
Washington Department of Fish and Wildlife
NOAA National Marine Fisheries Service
US Fish and Wildlife Service*

May 4, 2007

Peter Paquet
Acting Director, Fish & Wildlife Division
Northwest Power & Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

Dear Mr. Paquet:

In response to your request for public comment, the technical staffs of the fishery agencies and tribes have reviewed the Northwest Power Conservation Council document #97-6, entitled, "Consideration of Ocean Conditions in the Columbia River Basin Fish and Wildlife Program" and dated May 29, 1997. In the past decade since completion of the subject NPCC report, data has been collected and many analyses have been completed which advanced our understanding of salmon life cycle effects of the ocean and other factors. Some of these analyses have been conducted under the auspices of the Biological Opinion Remand process. Our overall review conclusions are:

- The subject report no longer provides an adequate technical basis for the upcoming NPCC amendment process in terms of consideration of the impact of ocean conditions.
- The NPCC should base the upcoming amendment process upon the significant body of work that have been conducted since 1997 regarding salmon life cycle analysis and the impact of the interaction of ocean and river conditions.
- The three views described in the document, A, B, C describing the ocean environment and its relationship to freshwater are outdated and should be revised to reflect newer analysis and data.

Specific Comments

The introduction of the report states:

“Consequently , because the two primary ways fish and wildlife managers can influence salmon survival in the ocean are through preserving life-history diversity in salmon and improving estuarine and near-shore conditions, staff proposed to “consider the impact of ocean conditions on fish and wildlife populations” by:

1. Evaluating the impact of projects, strategies and the fish and wildlife program on salmon productivity and diversity; and
2. Evaluating the impact of projects, strategies and the fish and wildlife program on the conditions of estuarine and near-shore ocean habitats.”

This introductory summary statement is out of date and as a result the two potential courses of action identified for the NPCC are also out of date. Analysis conducted since 1997, including Technical Recovery Team analysis, Fish and Wildlife Program projects evaluating fish condition and physiology throughout their downstream migration, Independent Science Advisory Board review of latent mortality, Biological Opinion Remand process analysis, and the Comparative Survival Study workshop and analyses are a portion of the body of more recent work which identifies additional courses of action that the NPCC should pursue to address the requirements of section (4)(h)(10)(D)(vi) to “consider the impact of ocean conditions on fish and wildlife populations.” Much of this work considers the effect of ocean conditions and river conditions together on salmon life cycle survival to adult return. These data and analysis indicate that there are other factors that can be influenced by managers that influence ocean survival and adult return rates such as smolt condition, smolt arrival time to the estuary, and smolt travel time. Although improving near ocean conditions, such as river flows increasing the area of the plume, may influence salmon survival, there is strong empirical basis for the effects of arrival timing to the estuary and travel time impacts on smolt to adult return rates.

The NPPC document describes three views of the possible relationship of the ocean environment and its relationship to the freshwater environment. None of these three views adequately capture the more recent data and analysis regarding salmon life cycle survival. The fishery managers recognize the variable effect of the ocean environment on salmon returns. Recent analysis of salmon life cycle analysis have captured the common year effect of the ocean on stocks of different origins and have explored the variation in recruit per spawner related to ocean indices such as upwelling and the Pacific decadal oscillation and fresh water travel time through the hydrosystem.

To conclude, the subject document should undergo substantial updating before it can provide an adequate basis for the upcoming amendment process to incorporate more recent technical analysis. The technical staffs of the tribes and fishery agencies offer to provide assistance to the Council in updating and reviewing the next draft document.

Sincerely,



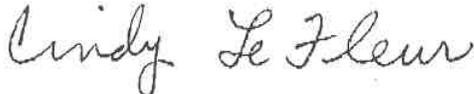
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