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Mr. Walker:

This letter provides comments on behalf of the Oregon Chapter of the American Fisheries Society on the Artificial Production Review and Evaluation (APRE). Problems are immediately apparent in examining the individual hatchery reports on Stocks, Hatchery Program Description, and Summary of Potential Benefits and Risks (these reports were generated from the database that was created from a 100+ questionnaire). Right away, a reviewer is unable to decipher the meaning of the information summarized in the tables. For instance, under biological significance & goals, the letters L, H, & M are used to indicate status of stock/programs at a hatchery. Nowhere is this defined. Another acronym used is "nya"–we are not sure what this means (not yet available?) but it is used throughout the reports. In examining the reports, there are many "nya" answers, which makes one wonder about the validity of conclusions. While this may seem a minor problem, it seems to reflect on the general quality of the data inputted into the reports and leads a questioning reviewer to a larger problem: the glossy reports seem to be based on inadequate information even though it is presented as a scientifically valid and final answer on the numbers, quality, and importance of individual stocks/hatcheries. The APRE's hatchery reports were supposedly based on Hatchery & Genetics Management Plans (HGMP), a more thorough examination of hatchery programs, but in reality, many of the hatcheries have yet to complete these plans.

We also are aware that the states and federal agencies did not fully participate at the APRE workshops, which may explain the numerous deficiencies and inaccuracies found in the individual program reports. The primary emphasis for the agencies has been to complete the Hatchery and Genetic Management Plans, finding the APRE a redundant process with an inadequate method for addressing whether programs were meeting goals and ESA concerns. Apparently, much of the information for different programs was garnered at workshops by contractors for the NW Power and Conservation Council who relied on the attendees to provide

answers, regardless of the expertise and authority of those present. For example at an early workshop, there were no attendees from Washington Department of Fish & Wildlife or local fisheries researchers familiar with the White Salmon and Wind River watersheds and these became open topics of discussion. Later in the APRE process, at another workshop attendees were given a password and approximately one week to review hatchery programs and answers to a 100+ questionnaire and contained subjective questions like "biological significance of stock in question". However, there was little time for review to ensure accuracy by the individual hatcheries or fishery managers.

On the document 2003-17 (the overall summary):

As stated in the executive summary: "The information database is to form the foundation for continuing consideration of artificial production in the basin". Reviewing the questionnaires and individual reports from the hatcheries, there is a lot of information missing, casting doubts as to conclusions that could be made. However, the report seems to be objective in the information that is presented, although it does not provide much new information.

Thoughts & Concerns on the draft report, 2003-17:

1. The definitions of integrated and segregated do not necessarily describe all of the hatcheries.

2. This report doesn't give estimates for "How many?", "What species of?", and "Where did ?" anadromous fish occur 100 to 200 years ago. This seems appropriate information to include because there is so much emphasis on what hatcheries have done/are doing to the natural populations. In the General Conclusions, under "Hatcheries are limited in what they can accomplish", there is a statement "Despite massive hatchery programs, current adult returns to the C.R. Basin fall far below historical estimates"–what are the historical estimates?

3. The report uses a minimal one to two references to support many of its statements on intra- and inter species effects, pages 32-36. For example the statement ". . . hatcheries have been known to introduce new diseases and parasites into the natural environment with devastating results (Johnsen and Jensen, 1991)" on p. 33 is supported by only one paper. However, I appreciated that the APRE recognized that disease interactions between wild and hatchery are unknown, pathogens originated from wild fish and that the hatcheries work to minimize disease in their fish.

4. Under (3) Informed decision-making: We agree that hatchery programs should be monitored for the basic information. They should know how many fish return, the best rearing strategies to prevent disease and optimize adult return. As the APRE stated, production goals (and legal mandates) drive management more often than good fish culture. There are many cases where a hatchery manager is forced to accept conditions/out-of-basin fish etc. to fulfill U.S. v OR or other mandates, against the better decisions for the biology for the watershed.

5. This APRE requests sound fish health management strategies through reducing numbers and avoiding/eliminating inter-basin transfers–all good disease preventatives. Fish pathologists often have to fight the battle (usually lost) to prevent fish transfers that are detrimental to the health status of the receiving hatchery and its stocks. Supplementation programs that are dependent on

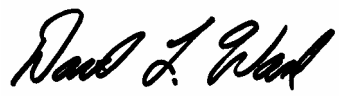
importation of outside stocks and out-of-basin-reared stocks need to follow fish health policies. Some of the native stocks may have an extremely poor health record compared to locally adapted hatchery stock.

Editorial Comments

In Table II-2, p 28: We don't understand what is meant by "Biological potential of target species".

Thank you for the opportunity to comment on this document. The Oregon Chapter of the American Fisheries Society is comprised of over 400 fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, and diverse private employers, including students and retirees. The Chapter was established in 1964 as part of the American Fisheries Society. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse concerning fisheries and aquatic science and by promoting the development of fisheries professionals. Please let us know if we can help with future reviews.

Sincerely,



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