

**INDEPENDENT
MULTIDISCIPLINARY
SCIENCE TEAM
(IMST)**



State of Oregon

**John Buckhouse
Wayne Elmore
Stan Gregory
Kathleen Kavanagh
William Pearcy
Carl Schreck**

April 7, 2003

Ed Bowles
Fish Division Director
ODFW
2501 SW First Avenue
Portland, OR 97207

Dear Ed,

The Independent Multidisciplinary Science Team read the February 24 and March 9 drafts of ODFW's Hatchery Management Policy. While ODFW did not request a formal review, we offer the following insights, comments and questions.

In general, we commend ODFW for formulating a policy concerning hatchery management for the State of Oregon. We generally agree with the General Hatchery Management Policy Goals and Principles as outlined, and believe they are consistent with the current state of science. We also support a strong monitoring and evaluation program that enhances adaptive management.

Here are some specific comments:

Hatchery Program Management Plans. We believe that development of hatchery management plans for **each** hatchery facility should also incorporate a broader, landscape approach that includes and integrates all the hatcheries, and the status of naturally reproducing stocks, within a watershed, ESU or management area plan (see also comments on monitoring below). The plan should explicitly identify the role of the individual hatchery in the goals of the state.

Hatchery Program Objectives and Types. We believe that "minimal adverse interactions" and "minimal adverse effects" are subject to wide interpretation and need better definitions. What is "minimal" to one person may not be "minimal" to another. Who sets the criteria against which the "minimal" is judged?

Planning and coordination of hatchery programs. The statement "The process outlined in the Native Fish Conservation Policy...." needs to be revised and explained. "Process" is not outlined in the NFCP, which is a statement of policy.

Rearing protocols. Why is the policy focused on "numbers of fish"? Other objectives may be more consistent with the Oregon Plan; for example, the quality or type of fish or distribution of fish.

Why is the exploration of experimental rearing techniques restricted to conservation hatcheries? Perhaps simulation of natural rearing conditions is the best way to rear production fish as well.

April 8, 2003

Bowles

Page 2

Fish transfers and releases. What are the policies on “off-station” releases in adjacent or other watersheds and criteria for determining adjacency?

The Policy should also address the issue of no unauthorized releases of fish, no matter what the circumstances. How personnel, e.g., hatchery staff, hatchery truck drivers, etc., will be instructed in this regard should be indicated. The point is that it would be better to let hatchery fish die than to liberate them without formal authorization from superiors. This is particularly relevant to the “emergency contingency plans” discussed.

Some mention should be made of how decisions will be made relative to release strategies and tactics. Will fish be liberated at the same time that wild migrants are expected in the system or will they be separated in time and space? How will hatchery releases be achieved, crowding, volitional, etc., and how will that decision be made?

Monitoring and Evaluation. This, we believe, is crucial to success of both the HFMP and the NFCP. Again, a landscape approach is recommended, where the results of monitoring are assessed for hatcheries within a larger geographical context. Monitoring results need to be considered from both a local and a landscape perspective. For example, are there hatchery effects outside of the basin containing the hatchery under consideration? There needs to be a centralized synthesis of the monitoring and evaluation results allowing conclusions at levels higher than a specific hatchery. This will facilitate adaptive management and assessing whether the hatchery is contributing to general state goals.

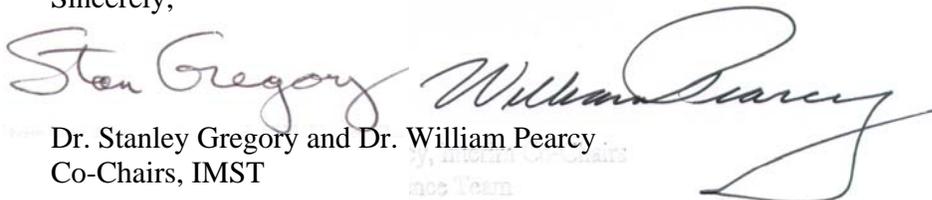
How will the “production advantage provided by the hatchery relative to natural production” be assessed in view of potential interactions?

The extent of monitoring and evaluation programs should be made explicit. They should be outcome-based, such as numbers of resultant adults, post-release survival, lack of adverse effects on wild stocks, economic or social benefits, etc.

Fish Hatchery Record Keeping. Post-release survival is important and should be included.

We hope that these preliminary comments may be helpful and we look forward to continuing our discussion of the Policy with you at our April IMST meeting.

Sincerely,


Dr. Stanley Gregory and Dr. William Pearcy
Co-Chairs, IMST

cc: Jim Myron, GNRO
Jim Brown, GNRO
OFWC
Bruce McIntosh, ODFW
IMST