INDEPENDENT MULTIDISCIPLINARY SCIENCE TEAM (IMST)

State of Oregon

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Dear Ed:

This letter comments on the Oregon Department of Fish and Wildlife's proposed Hatchery Management Policy and Guidelines (Hatchery Policy), draft of December 14, 2001. The proposed policy is in response to an Independent Multidisciplinary Science Team (IMST) recommendation that "ODFW should develop a comprehensive plan/cohesive policy for hatchery management"[1].

ODFW has made a commendable effort to comply with this recommendation. In general, the proposed Hatchery Policy addresses the important issues that were the basis for the IMST's recommendation. ODFW deserves credit for coming this far in the development of a well-formulated policy in such a short time given that there were no former written policies on this subject. We are particularly pleased that ODFW's proposed Native Fish Conservation Policy has been embraced in the Hatchery Policy. We believe that hatcheries must be operated under a landscape perspective; they can influence salmonid stocks beyond their immediate watersheds, with the potential to be part of landscape- or gene conservation group-level management tactics. However, the Native Fish Conservation Policy should take precedence over the Hatchery Policy.

While the proposed Hatchery Policy is quite comprehensive, we offer the following comments on important elements we believe should be included.

1. The Hatchery Policy needs to coincide more with the Native Fish Conservation Policy. There should be more explicit discussion of how the Hatchery Policy would be integrated into a landscape perspective – what this really means and how it would function. The following questions should be addressed.
    a. What policies or guidelines will guide decisions concerning the number of hatchery fish liberated into a watershed given various abundance-scenarios of wild fish (e.g., wild stocks experiencing a sharp decline in abundance versus those experiencing increases in abundance)? Criteria concerning the liberation of hatchery fish should be formulated for each watershed before any supplementation takes place.

[1] Independent Multidisciplinary Science Team. 2001. The scientific basis for artificial propagation in the recovery of wild anadromous salmonids in Oregon. Technical Report 2001-1 to the Oregon Plan for Salmon and Watersheds. Oregon Watershed Enhancement Board. Salem, Oregon.

   a. What policies and guidelines will be followed concerning the number of hatchery fish liberated under different environmental conditions (e.g., high flow versus severe drought, good or bad ocean conditions, etc.)?
   b. What policies and guidelines will direct hatchery operations as part of adaptive management decisions at the landscape level?

2. We strongly support the Hatchery Policy with regard to record keeping and the monitoring on which it must be based. The Hatchery Policy should also describe those policies and/or guidelines relevant to the use of the information from monitoring and operation records. In general, who reviews the information, in what time frame is the information reviewed, and what policies or guidelines are in place to direct the decisions made based on this information? The Hatchery Policy should describe how landscape-level decisions are made relative to hatchery operation from monitoring and operation records. In other words, is there "big picture" oversight and where does it occur (e.g., agency headquarters, regional offices, individual hatcheries)? Currently, it resides at individual hatcheries and this does not represent oversight.

3. Staff training is an essential component of the Hatchery Policy. The following questions should also be addressed.
   a. Are there policies or guidelines that direct what staff require what training? With regard to the content of the training, does it include the elements relevant to genetics and conservation biology necessary to operate a hatchery as part of an inclusive landscape-level plan?
   b. Are there policies or guidelines in place to assure that staff has the knowledge, based on the content of the training, to make decisions?

4. While salmonids are the taxon that comprise Oregon's present focus on fish culture activities, the Hatchery Policy is open-ended, implying that salmonids are the "bulk" of the fishes reared in the state. Since other native fishes (e.g., sturgeon; lamprey) might be cultured in Oregon in the future and since exotic game fishes are cultured, the Hatchery Policy should address if and how the policy and guidelines would apply to such species. In addition, the Hatchery Policy should indicate relevancy to imported cultured fishes. The IMST recommends that guidelines and policies directed at Oregon's native salmonids apply to other native taxa and, where relevant, to imported cultured fishes including game and non-game species. The IMST is particularly concerned with how the culture and release of brook and brown trouts meshes with the Native Fish Conservation Policy (see "Hatchery Production Summary for production in 2001-2002", Appendix H in the Hatchery Policy). Use of non-indigenous species should be clearly defined.

5. We recognize that the proposed Hatchery Policy is directed at the State's hatchery system. However, the elements of the policy that clearly apply to private hatcheries (e.g., the need for record keeping concerning pathogens, treatment or disposal of infected individuals, etc.) should fall under State policy as well.

   In addition to State and private hatcheries, there are major federal and tribal hatcheries operating in Oregon. The Hatchery Policy needs to consider the operations of those

facilities from the landscape-level in planning operations for State hatcheries. Coordination between the ODFW and the U.S. Fish and Wildlife Service and/or appropriate Tribes regarding the liberation of federally or tribally produced fish into the State's waters should be established if not already in place. The potential cumulative impacts that all liberated hatchery fish (regardless of who manages which operation) may have on native fish and aquatic ecosystems should be taken in to account as ODFW determines state hatchery management plans.

6. We clearly endorse marking all hatchery fish prior to release (page 18 of the present draft).

7. The Hatchery Policy mentions making hatchery fish as similar as possible to wild fish. However, this may not always be appropriate (e.g., SAFE Program and CEDC net pen facilities).

8. The notion of conservation hatcheries abounds in the Pacific Northwest. Is there any evidence that such a hatchery will work to the degree that the hatchery could be shut down after the successful establishment of sustainable and healthy populations of naturally spawning salmonids? Given that conservation hatcheries must be viewed as largely experimental, the Hatchery Policy should clarify the conditions under which such a hatchery program would be attempted. A conservation hatchery concept would, at best, be appropriate to test only in watersheds where wild spawning stocks are not at risk (i.e., functionally extinct).

9. We agree with the critical importance of addressing the various causes for the decline of wild populations to restore naturally reproducing population. However, this aspect is given little discussion in either the Hatchery Policy or the Native Fish Conservation Policy.

Again, the IMST sincerely appreciates the strides that ODFW has made in the formulation of this proposed Hatchery Policy. We would be pleased to provide more clarification if necessary.

Respectfully yours,

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cc: OFWC
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