

Public Correspondence

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Mr. Smith and ODFW,

In response to the public release and announcement of the Oregon Department of Fish and Wildlife Plan for Reintroduction of Anadromous Fish in the Upper Klamath Basin (April 17, 2008), we would like to formally register our concerns with ODFW and administrators of the reintroduction plan.

While the document, "A Plan for the Reintroduction of Anadromous Fish in the Upper Klamath Basin" reveals that significant research, planning, and anticipation of additional planning has been done for this effort, a number of noteworthy uncertainties and concerns warrant caution when considering additional reintroduction planning and implementation.

Though the Klamath River was once the third greatest salmon fishery in the nation, it currently struggles to maintain fish populations due to poor water quality, water availability, and passage barriers, among other challenges. Some of the results of these difficulties include endangered coho, struggling fall chinook populations, and a nearly non-existent spring chinook population. The plan to reintroduce anadromous fish to the Upper Klamath Basin is directed to address such challenges through alternative (unnatural) means of support. Though this plan might help restore anadromous populations to the Basin in Oregon, the potential threats and concerns may outweigh the benefits.

Rivers need native populations in order to maintain healthy fisheries. The Klamath River Basin Fish Management Plan (ODFW 1997) (adopted by the ODFW Commission in 1997) suggests:

ODFW generally supports the reestablishment of sustainable populations of indigenous species; however, because of existing habitat problems, loss of the native stocks, risk of disease introductions, and potential competition with remaining native redband trout, it does not appear feasible, or prudent, to attempt re-establishment of anadromous salmon or steelhead to the upper Klamath Basin in Oregon, now or in the near future.

However, ODFW will support such reintroductions if and when the biological and physical questions are addressed and show that such actions are feasible and prudent. Further, ODFW would support future studies addressing that feasibility and the habitat restoration that would be conducive to successful reintroductions.

The Basin Fish Management Plan reference to ODFW's support of indigenous species and reintroductions *if and when* the biological and physical questions are addressed suggests that the management priority is to allow native populations to demonstrate their

strength and viability prior to the department's stocking of what were once native-fish-only waters. In addition, it does not appear that the biological and physical questions and concerns have been answered, as is apparent in the lengthy list of uncertainties (p.11) in the department's plan for reintroduction.

Given the passage barriers present due to PacifiCorp's Klamath Hydroelectric Project (KHP) dams, we cannot be certain of the viability of the indigenous anadromous population in the upper basin. Under the aforementioned Basin Fish Management Plan, native populations should be given ample opportunity to repopulate this section of the basin through natural passage rather than restocking, once passage barriers are removed or altered. If indigenous populations were unable to self-restore, then restocking by the department might be considered. However, there is no evidence at present to suggest that native populations are absolutely unable to repopulate considering the presence of passage barriers.

Alternatives for indigenous population support are possible. Given the limited population of spring chinook and the troubled fall chinook runs in the Klamath River, a listing with the Endangered Species Act of these fish would require the basin, as a whole, to take greater care of the restoration of these fragile populations. While artificial means of reintroduction might secure numbers, it will not secure the health and presence of a native fish population. In accordance with the Basin Fish Management Plan, ODFW should reconsider whether or not their plan for reintroduction adequately meets its own terms for the necessity of hatchery reintroductions.

Furthermore, politics should not dictate indigenous fish management. The suggestion that "there have been significant social, political and habitat related changes in the basin that make attempting re-introduction of anadromous fish prudent at this time" (p.2) in the plan for reintroduction does not provide sufficient evidence of necessity for restocking. That is, political and financial encouragement from the Bush Administration and others in light of the Klamath Basin Restoration Agreement (released January 15, 2008) should not dictate ODFW policy. The ODFW plan for reintroduction fits conveniently within the interests of a number of Klamath Basin Restoration Agreement (heretofore referred to as, the Klamath settlement) parties and would clearly facilitate their needs and financial interests, in spite of other stakeholder concerns. Although there are some benefits for fish in the Klamath Settlement, these benefits and their implementation remain uncertain. Such significant uncertainties there may undermine any benefits.

Recent Klamath settlement negotiations have produced contentious debate over the Klamath Basin's natural resource management. Linking an ODFW plan for reintroduction to such a controversial, unsettled, and financially burdensome plan does not seem to be in the best interests of ODFW and the populations it is designed to support. In addition, the Klamath settlement does not currently include dam removal. Many Klamath Basin advocates have argued that the settlement not be wedded to dam removal, however, at present they remain linked. As a result, it is unlikely that dam removal will happen in a timely fashion, given the pace of negotiations thus far.

Therefore, ODFW's dependence on dam removal to complete Phase 1¹ of the plan for reintroduction will clearly be stalled until a removal or passage agreement is reached.

There are numerous past and present dam removal processes that reinforce our concerns that the timeline for removal of the KHP dams will be convoluted and uncertain. Dam removal can require extensive approval from a number of agencies (state and local governments, etc.) and can take years to complete. Condit Dam on the White Salmon River is an excellent example of dam removal process uncertainties. Stakeholders reached agreement with PacifiCorp, Condit Dam owner, as early as 1999 but are still awaiting dam removal, scheduled for sometime in late 2008. Dam removal has been held up due to necessary agency process and guidelines (see www.whitesalmonriver.org/why_remove.php). Agency prescriptions for fishways on the KHP dams insure that fish will be passing through and eventually reintroduced to the Upper Klamath Basin, prompting ODFW's proposed changes in the policy. Given the uncertain timeline and the aforementioned fishway requirements, ODFW should not rely on the Klamath Settlement for progress in the Upper Klamath Basin or elsewhere.

Significant uncertainties regarding management of reintroduction warrant considerable caution. Pages 10 and 11 in the plan for reintroduction identify a number of uncertainties in need of greater investigation. Without confirmation of a number of these uncertainties, the plan for reintroduction should not go forward.

The limited availability of a genetically true indigenous spring chinook is a serious uncertainty. The introduction of hatchery races without careful consideration of the native populations may result in a complete dilution of native chinook genetics and likely cause deleterious effects to these existing stocks. Given the precarious state of native populations/numbers at present (see references p.14 of ODFW plan for reintroduction), an influx of hatchery fish will surely deplete any hopes of the ODFW mandate to reestablish sustainable populations of indigenous fish in the Klamath Basin.

The list of uncertainties regarding the ODFW reintroduction plan is long and well thought out, as noted by the department. These are valuable uncertainties to consider as the department embarks on this project. Without secure answers to a number of these questions (e.g. "How do we monitor interactions between resident fish currently present in Upper Klamath River and tributaries and newly re-introduced anadromous fish?"), the risks for this plan far outweigh the limited benefits (hatchery subsidies, recreational fishing opportunities, etc.).

If non-native stocks are used in the ODFW reintroduction plan, and there are inadequate stock identification methods, how will ODFW determine interactions with the native anadromous population? At present, there is insufficient information available to accurately identify the various stocks considered for use by the ODFW in active intervention efforts in the reintroduction of salmonids above Upper Klamath Lake, nor to identify which stock are naturally recolonizing. There exist methods and techniques which can assist managers with the genetic identification of various stocks, life history

¹ "A major assumption in Phase 1 is that acceptable upstream and downstream fish passage is provided throughout the Klamath River corridor, either through passage facilities at PacifiCorp's hydroelectric dams which meet state and federal standards, or through dam removal" (p.6, A Plan for the Reintroduction of Anadromous Fish in the Upper Basin).

assessment tools, and other applications. The ODFW must have adequate stock identification for any species used in reintroduction, prior to implementation. Furthermore, stock identification for the native stocks of concern, either to be used or potentially genetically diluted, should be secured prior to implementation. Use of fish that can not be tracked to determine success and/or failure, as well as their impacts on other existing native populations, reduces the ability to monitor and adapt management to be most successful.

There is **no security that serious fish disease does not envelop the upper basin fish populations, both native and hatchery**. The ODFW plan for reintroduction acknowledges the risk of disease to native species through the introduction of [hatchery] salmon (p. 17-18). Given the potential for more potent and/or resistant pathogens, competition for spawning habitat, and greater predation from competing species, the risks for fish health are significant. Though the department suggests that disease resistant brood stocks are to be used, there are no guarantees that these stocks will remain resistant to yet introduced pathogens or infectious diseases (p.18). Should this reintroduction result in new and more resistant fish disease, it could be detrimental to the entire basin fisheries. To this end, the “Assumptions and Rationale” (p.20) in the ODFW reintroduction plan speak directly to the aforementioned concerns.

As ODFW moves forward with this plan, I hope they will do so with great caution, acknowledging the aforementioned concerns. The risks for disease, native population loss, unnecessary hatchery subsidies, lack of adequate stock identification, and political interference are great. Thank you for your consideration, we look forward to speaking with you about this plan.

Sincerely,

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