

November 12, 2004

Chief
Protected Resources Division
NMFS
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Email: salmon.nwr@noaa.gov
(040525161-4161-01)

Re: *Endangered and Threatened Species: Proposed Listing Determinations for 27 ESUs of West Coast Salmonids*

Dear Chief:

Thank you for the opportunity to comment on the Proposed Listing Determinations for 27 ESUs of West Coast Salmonids. We strongly support attempts to conserve and recover Pacific salmon and steelhead. We support the continued listing of all 26 ESUs, as well as the listing of the additional candidate species. However, we disagree with the application of the proposed hatchery policy (69 Fed. Reg 31354 (June 3, 2004)) in making listing determinations for the ESUs. PRC asserts that hatchery fish must not be considered in wild fish listing determinations, except as threats to wild populations.

NOAA Fisheries should consider the following documents before making its final listing determinations:

- 1) Pacific Rivers Council's comments on the proposed hatchery policy.
- 2) Gretchen R. Oosterhout, PhD and Charles W. Huntington, *A Stochastic Life-cycle Model Investigation of the Potential Benefits of a Conservation Hatchery Program for Supplementing Oregon Coast coho (Oncorhynchus kisutch)*, Report prepared for Pacific Rivers Council (July 1, 2003) (available at <http://www.pacrivers.org/verityStorage/Oosterhout%20Report.pdf>).
- 3) Frances C. James, Russell Lande, Simon A. Levin, Ransom A. Myers, William W. Murdoch, and Robert T. Paine, Recovery Science Review Panel Report, Northwest Fisheries Science Center, Seattle, Washington (July 21-23, 2003).
- 4) Ransom A. Myers, Simon A. Levin, Russell Lande, Frances C. James, William W. Murdoch, and Robert T. Paine, *Hatcheries and Endangered Salmon*, Science, Vol. 303, 1980 (2004)
- 5) NOAA Technical Memorandum NMFS-NWFSC-42, Viable Salmonid Populations and the Recovery of Evolutionarily Significant Units, June 2000 at <http://www.nwfsc.noaa.gov/publications/techmemos/tm42/tm42.pdf>

- 6) Artificial Propagation Evaluation Workshop Report, April 21-23, 2004, National Marine Fisheries Service Salmon Recovery and Protected Resources Divisions at <http://www.nwfsc.noaa.gov/publications/techmemos/tm42/tm42.pdf>
- 7) Salmonid Hatchery Inventory and Effects Evaluation Report: An Evaluation of the Effects of Artificial Propagation on the Status and Likelihood of Extinction of West Coast Salmon and Steelhead Under the Federal Endangered Species Act, NOAA Fisheries/ NMFS Northwest Regional Office Salmon Recovery Division, at http://www.nwr.noaa.gov/1srd/Prop_Determins/Inv_Effects_Rpt/index.html
- 8) Hatchery Broodstock Summaries and Assessments for Chum, Coho, and Chinook Salmon and Steelhead stocks within Evolutionarily Significant Units listed under the Endangered Species Act, May 12, 2003, Salmon and Steelhead Hatchery Assessment Group, NOAA Fisheries at http://www.nwr.noaa.gov/AseaResponse/20040528/FinalSSHAG_Report04031.pdf
- 9) 2003 Final BRT Report, NOAA Fisheries/ NMFS Northwest Regional Office at <http://www.nwr.noaa.gov/AseaResponse/20040528/brtusr.html>
- 10) February 3, 2004 memorandum, FOR: D. Robert Lohn Regional Administrator Northwest Region, Rod McInnis Acting Regional Administrator Southwest Region, FROM: Usha Varanasi Science and Research Director, Northwest Fisheries Science Center, SUBJECT: Extinction Risk Assessments for Evolutionarily Significant Units (ESUs) of West Coast *Oncorhynchus mykiss* at http://www.nwr.noaa.gov/AseaResponse/20040528/CenterMemo_Re_Omykiss020304.pdf
- 11) Independent Scientific Advisory Board (ISAB). 2003. Review of salmon and steelhead supplementation. ISAB for the Northwest Power Planning Council, NMFS, and Columbia River Basin Indian Tribes, 851 SW 6th Ave, Suite 1100, Portland, OR 97204. Doc. ISAB 2003-3. at <http://www.nwcouncil.org/library/isab/isab2003-3.htm>

In addition, PRC understands that the state of Oregon may be submitting an assessment of its Oregon Plan for Salmon and Watersheds and NOAA Fisheries may consider this assessment in determining whether the protections of the Endangered Species Act should be removed from the Oregon Coast coho ESU. We expect that if this happens, NOAA Fisheries will reopen the public comment period so that the public can comment upon the assessment and its impact upon the Oregon Coast coho's need for federal protection. PRC asserts that NOAA Fisheries must use a recovery standard when evaluating whether Oregon Coast coho ESU no longer warrant federal listing, ie NOAA Fisheries must determine that the Oregon Coast coho ESU has recovered before removing ESA protections.

Sincerely,

Bronwen Wright
Conservation Associate
On behalf of Pacific Rivers Council

cc: State of Oregon