



IN REPLY REFER TO:

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United States Department of the Interior

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Bonneville Power Administration
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P.O. Box 14428
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Subject: Comments on Draft Environmental Impact Statement (DEIS) for Chief Joseph Hatchery Program, DOE/EIS-0384

Ladies and Gentlemen:

The following comments respond to your April 25, 2007, request for review of the subject document.

The proposed project focuses on Upper Columbia River (UCR) summer/fall Chinook salmon and secondarily on UCR spring Chinook salmon. The proposal to propagate out-of-basin Carson spring Chinook salmon stock at the new facility (page 2-3) should be reconsidered in light of a proposed action under the Federal Columbia River Power System Biological Opinion remand to discontinue propagation of the Carson stock at the Entiat National Fish Hatchery and reprogram that facility to propagate a different stock. If one goal of the Chief Joseph Hatchery Program is eventually to restore UCR spring Chinook salmon to the basin, the hatchery program would be advised to work with the appropriate state and Federal agencies to initiate that part of the program with locally derived broodstock rather than out-of-basin broodstock. This may likely be a long-term effort since the UCR spring Chinook salmon is ESA-listed endangered and in low abundance. For all programs at the hatchery, indigenous locally derived broodstock should be considered.

On page S-4, the DEIS states that Component 1 is a program designed to increase abundance, distribution, run timing and diversity of naturally spawning summer/fall Chinook salmon within their historical Okanogan subbasin habitat, and that this is a supplementation program to produce 1,100,000 hatchery smolts annually. As the number of naturally produced and naturally spawning summer/fall Chinook salmon increases, will reliance on hatchery production (supplementation) be reduced? Page 3-6 of the DEIS states that the Okanogan River is a low gradient, low velocity system in which production of salmonids is limited in the mainstem by high water temperatures, high sediment, lack of habitat diversity, and in some places, lack of connectivity with the floodplain. Furthermore, the Okanogan River has few stable sources of cold water and a thermal barrier forms each summer at the mouth which affects the upstream passage of fish. With this statement being the case, what is the prospect that Component 1 (or Components 2 and 3 for that matter) of the hatchery program will be successful?

The DEIS states that acclimation ponds at various locations in the Okanogan River will result in a broader distribution of returning adult spawners and spread out the spawning activity throughout the river. The DEIS should provide some indication of the extent and quality of potential spawning habitat in the Okanogan River. If substrate quality and other environmental conditions are unsuitable, spawning activity may still be concentrated in a few suitable locations.

On page 1-5 the DEIS should clearly define and describe the "hatchery supplementation program." Is this a program that will be phased out as natural production of fish in the river increases, resulting in increased abundance and distribution of fish, or is it viewed as a long-term program without regard for increased abundance of naturally produced fish? Will supplementation apply differently to summer/fall Chinook salmon and spring Chinook salmon?

The propagation of yearling and subyearling summer/fall Chinook salmon from the broodstock to reflect natural diversity and add some necessary flexibility in the program (page 2-3) should be explained in more detail.

On page 2-22, describing the Riverside acclimation pond, the DEIS indicates that the discharge from the pond is low velocity onto a flat concrete pad designed to prevent erosion of the river bed. Would this situation have the potential to cause any injury or harm to fish volitionally migrating from the pond?

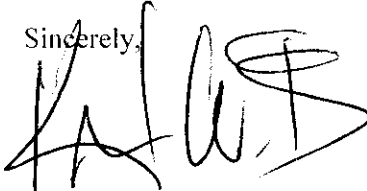
Regarding the discussions of chemical pollutants on page 3-13, it would be useful for the DEIS to provide examples of some of the chemicals that are typically used in fish culture, how these chemicals are used, and how hatchery effluent containing chemicals is treated.

Regarding fish health on page 3-14, the DEIS states that hatchery effluent would not be treated even though hatchery intake water will be filtered and UV-filtered to reduce pathogens. It would be advisable to either treat the hatchery effluent as a regular operation, or ensure that there is a contingency plan to contain or treat for any pathogen that does unexpectedly appear in the hatchery.

On page 3-16 under interbreeding, the DEIS notes that at least 80 percent of the naturally spawning fish will be natural-origin fish, resulting in about 20 percent of the naturally spawning fish being of hatchery-origin. It does not indicate the proportion of hatchery-origin and natural-origin fish in the hatchery broodstock. Will hatchery broodstock incorporate any natural-origin fish? This issue should be discussed.

What are the tangible outcomes or results of releasing yearling summer/fall Chinook salmon (page 3-18)? What is their typical life history strategy? Are they ocean-type or stream-type? The last sentence in paragraph 3 on page 3-18 states that upper Columbia River species that are listed (e.g., the UCR spring Chinook salmon and steelhead) all rapidly migrate into and then down the Columbia River as yearling fish. This suggests that the non-listed summer/fall Chinook salmon are ocean-type fish that migrate as subyearlings. So what are some of the potential benefits or advantages, if any, of releasing some UCR summer/fall Chinook salmon as yearlings?

Thank you for your attention to these comments. Please direct technical questions to Mr. Stephen Grabowski at 208-378-5030.

Sincerely,

Karl Wirkus
Deputy Regional Director