

**Feasibility of Reintroduction
Of
Anadromous Fish Above
Or
Within the Hells Canyon
Complex
(E. 3.1-2)**

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Contracted by the

Oregon and Idaho Bureau of Land Management

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Foreword

The anadromous fish reintroduction study progressively develops information in each of ten chapters that culminates by providing conclusions in chapter 11. Many of the chapters do not provide a conclusion about the information presented within the chapter. However, the chapters do provide a discussion section. Therefore, it was necessary for the author to develop conclusions where possible for each chapter to comply with the BLM format for analyzing the information. In some cases it was possible to directly quote conclusions and in others it was necessary to paraphrase several pages to extract a conclusion. Anyone reviewing this document should read chapter 11 first to preview the Applicant's main conclusions concerning fish reintroduction above the Hells Canyon Complex.

(Feasibility of Reintroduction of Anadromous Fish Above or Within the Hells Canyon Complex)

Introduction and Overview

(E.3.1-2, Chapter 1)

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I. Introduction

*“The feasibility of reintroducing anadromous fish above Hells Canyon Dam has been discussed in numerous forums. In the late 1980s during a workshop initiated by Senator James McClure, the workshop participants concluded that reintroduction was possible if three prerequisites could be met: 1) smolt passage problems at existing lower Snake and Columbia river dams were solved, 2) flows in the lower Snake River reservoirs were improved to enable successful smolt passage, and 3) a reintroduction program were not developed at the expense of existing fisheries programs in the Snake and Columbia rivers. In the final recommendations to the National Marine Fisheries Service, the Snake River Salmon Recovery Team recommended that the issue of reintroduction for fall chinook salmon (*Oncorhynchus tshawytscha*) be examined again in the future, especially if smolt collectors that were harmless to the fish could be developed.*

The issue of the feasibility of reintroducing anadromous fish was also identified by regional interests represented in the Aquatic Resources Work Group as part of the relicensing process of the Hells Canyon Complex (HCC). In addition, the issues of anadromous fish passage and habitat availability continually arise in discussions relating to other Idaho Power Company (IPC) projects along the mainstem Snake River above the HCC that are also involved in the process of relicensing.” (Page 1, Paragraph 1& 2)

“This chapter discusses the approach IPC took to address the feasibility of reintroducing anadromous fish above the HCC and previews each of the subsequent chapters in this study report. The scope of the study was not limited to the immediate vicinity and production potential of anadromous fish in the HCC. Rather, the study looks at the entire historical distribution of anadromous fish and other passage barriers and habitat throughout that range.” (Page 2, Paragraph 2)

II. Conclusions

This chapter does not have a conclusion section. It does outline the Applicant’s approach to exploring the possibility of reintroducing anadromous fish above Hells Canyon Dam

and the Hells Canyon Complex. However, the following statement summarizes the Applicant's overall view point for the entire eleven chapters:

1. "Clearly, the issue of reintroduction raises many uncertainties. Reintroduction for the purposes of recovery of the salmon and steelhead listed under the Endangered Species Act does not appear feasible unless very significant societal commitment develops for ecosystem recovery. Also, unless average smolt-to-adult returns downstream of the HCC improve substantially, reintroduction with the goal of self-sustenance is quite infeasible. The same factors that limit anadromous fish downstream of the HCC would also limit success of reintroduction upstream of the HCC. Even with substantial increases in smolt-to-adult returns, most of the reintroduction scenarios that we examined would not permit self-sustaining populations of anadromous fish to develop in many subbasins." (Page 11, Paragraph 3)

Response:

This chapter briefly touches on the difficulties associated with reintroduction of anadromous fish that is systematically explored in chapters two through ten. The applicant outlines both the biological and physical parameters that must be addressed for fish reintroduction to the entire Snake River Basin above the Hells Canyon Complex.

III. Study Adequacy

The study approach is comprehensive and adequate.

IV. BLM Conclusions and Recommendations

Conclusions

The BLM should accept this approach. It provides all of the information necessary to develop plans needed to make preliminary fish passage recommendations.

Recommendations

Each subsequent chapter provides specific information on various aspects of fish reintroduction above the HCC that must be carefully evaluated. Chapters 2-11 provide a comprehensive analysis that makes fish passage appear infeasible. The negative IPC information bias is clearly designed to discourage any proposal by the fisheries interests to recommend attempting fish passage over the three dams.

The BLM should enter into discussion of the information provided by the applicant with NMFS, USFWS, ODFW, IDFG and the Tribes to determine whether the data can be interpreted in a manner that would support fish passage. The BLM should formulate a fish passage position following these discussions.