Project Number: 23049

Project Title: Benefit/Risk Analysis to Promote long-term Persistence of Chinook

Salmon in the Middle Fork Salmon River

Sponsor: Nez Perce Tribe

ISRP Comment: This proposal to conduct a Benefit/Risk Analysis in the Middle Fork Salmon River does not address imminent risks to ESA stocks by offering direct on-the-ground benefits with one-time funding. The work would benefit fish.

Sponsor Response: The Nez Perce Tribe believes that this project is directly related to Section 9.6.4.3 Actions to Create an Artificial Propagation Safety-Net Program in the NMFS (2000) Biological Opinion on operation of the federal Columbia River power system. This section of the Biological Opinion outlines a four step process to apply to populations considered for potential safety net actions. It further states that planning for a safety-net program must be conducted on an accelerated basis so that, if warranted, the project can be implemented expeditiously. The purpose of the safety-net program will not be achieved, and additional populations may go extinct, if the process suffers from excessive delay, or awaits additional information that may not exist or be available for some time (NMFS 2000).

The National Marine Fisheries Service draft Cumulative Risk Initiative (NMFS-NOAA 2000) states: "The seven Snake River spring/summer chinook salmon index stocks are experiencing a decreasing trend in population change. This trend appears to have worsened in the most recent vears for which we have complete data (1990-1994). Without additional intervention, the long-term prognosis for these stocks is clearly extremely poor". Three of the seven index stocks of spring/summer chinook salmon exist within the Middle Fork Salmon River, which this proposed Benefit Risk Assessment would examine. Kucera and Blenden (1999) report that Middle Fork Salmon River salmon subpopulations are in statistically significant decline, are at low levels of abundance and subsequent high demographic risk. NMFS-NOAA (2000) states in the Summary of Key Findings that: "The most recent data for Snake River spring/summer chinook salmon reveal that this ESU may be doing worse than was previously thought. It is now even less likely that dam breaching BY ITSELF will mitigate imminent risks faced by Snake River spring/summer chinook salmon. Importantly there are no data to indicate that improvements in any of the other H's (i.e., habitat, harvest, or hatcheries) could BY THEMSELVES, mitigate the extinction risks faced by the Snake River spring/summer chinook ESU".

The NMFS (2000) Biological Opinion also states in Action 178 that BPA shall commit to a process whereby funds can be made quickly available for funding the planning and implementation of additional safety-net projects for high risk salmon and steelhead populations NMFS identified during the term of this biological opinion. Middle Fork Salmon River chinook salmon populations clearly meet this criteria for planning

purposes, regardless of whether they are recognized for implementation of a safety-net action.

For these reasons we believe that this project proposal is a High Priority project for fisheries managers to implement and believe the National Marine Fisheries Service is obligated to immediately recommend funding.

## Literature Cited:

Kucera, P.A. and M.L. Blenden. 1999. Chinook salmon spawning ground survey in Big Creek and tributary streams in the South Fork Salmon River, Idaho 1992-1995. Assessment of the status of salmon spawning aggregates in the Middle Fork Salmon River and South Fork Salmon River. Tech. Rep. 99-7. Nez Perce Tribe Department of Fisheries Resources Management. Lapwai, ID.

National Marine Fisheries Service. 2000. Biological Opinion. Reinitiation of consultation on operation of the Federal Columbia River power system, including the juvenile fish transportation program, and 19 Bureau of Reclamation projects in the Columbia Basin. National Marine Fisheries Service, Seattle, Washington. December.

NMFS-NOAA July 17, 2000. Draft Cumulative Risk Initiative