



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400 phone
(907) 586-4473 fax
ata@gci.net

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William W. Stelle, Jr.
Regional Administrator
NMFS Northwest Region
7600 Sand Point Way NE
Seattle, WA 98115-6349

Subject: Mitchell Act Draft Environmental Impact Statement (DEIS)

Dear Mr. Stelle:

The Alaska Trollers Association (ATA) represents the Alaska commercial salmon troll fleet, which has relied heavily on Chinook salmon from the Columbia River Basin for well over 100 years. We have had the opportunity to review NOAA's Mitchell Act Draft Environmental Impact Statement (DEIS) and find it incomplete and misleading. **ATA requests that prior to taking any action NOAA withdraw, revise, and resubmit the DEIS document for additional public review.**

The Mitchell Act has long provided important mitigation to fishermen, whose harvests have been significantly and negatively impacted by the damming of the Columbia River and its tributaries. These hatcheries, since their inception, were intended to replace lost salmon production to sustain commercial, sport, and Tribal fisheries all along the coast. The promises made when the Mitchell Act was established are relevant today and will be for many years to come, as indicated by those who struck the original deal. To suggest that the federal government should, in any way, walk away from the commitments it made to fishermen is not only unacceptable, it is exceedingly dangerous to the economic future of a host of families and communities across the entire Northwest region.

If the underlying concern is hatchery review and reform, that's a discussion that our fishermen are anxious to engage in. Here in Alaska we have a carefully contemplated hatchery program that first seeks to safeguard the wild salmon resource and then works to provide stability and financial benefits to fishing communities. We recognize that it has been many years since the federal and state agencies to the south of us have invested in improving hatchery programs in the Columbia River Basin. Over the years ATA has worked with others to encourage a greater injection of funds into the Mitchell Act program, in order to pay for deferred maintenance and much needed science and technology upgrades. The payoff for such investment could be substantial for all of the states impacted by Columbia River Basin salmon and could help ease conflicts between user groups involved in Pacific Salmon Treaty negotiations.

The DEIS seems to focus on eliminating hatcheries, with some alternatives suggesting no new hatchery facilities. Shouldn't there also be an alternative that tunes up the Mitchell Act facilities and improves upon existing hatchery policies and regulations? Why did NOAA choose not to address hatchery reform in the DEIS?

The goal seems to be rebuilding purely wild salmon runs with a subsequent return to natural spawning. How does NOAA intend to achieve this goal? Is it even practical? Please define for us the meaning of a 'natural salmon' in the Columbia River Basin, since most of the natural spawning habitat is long gone, or at least above the dams and off limits to 'natural' salmon. Does the federal government intend to provide 'natural' salmon access to the remaining habitat above the dams? Are there plans to reclaim other habitat areas to make them accessible for 'natural salmon' to spawn?

Has the agency contemplated the impact on the Pacific Salmon Treaty should NOAA chose to veer away from Mitchell Act hatchery salmon? The current stock assessment program is underpinned by a mature coded wire tag program, which is based on hatchery indicator stocks. In some cases, the purest stocks of 'natural' salmon come from the hatcheries. Treaty allocation agreements impacting several states and two countries hinge on Columbia River Basin salmon production. How does NOAA suggest these agreements be dealt with in the face of its planned decline in salmon production? Who will pay the price? Any reduction in salmon production is likely to be viewed by Canada as a unilateral reneging of a U.S. commitment to their nation. U.S. fishermen are likely to question NOAA's motives as well.

The DEIS is light on solid information on the range of options and data from which to draw conclusions. The DEIS fails to address issues such as how 'natural' stocks and reliant fisheries will be managed to achieve maximum sustained yield, which will be necessary to support fisheries. Nor does the DEIS explain when and how habitat will be improved to support additional production, although there seems to be an assumption in the document that it will happen, somehow – someday. This assumption appears to deny the practical realities of a growing region and NOAA's failure thus far to develop a Columbia River Basin management plan that puts a priority on providing habitat and safe passage for 'natural' salmon.

The bottom line is that this DEIS was not ready for prime time and should be pulled back. It is our hope that NOAA will choose a different path for evaluating and improving the Mitchell Act hatchery program. Should you choose to do so, you will find significant support amongst those of us most directly impacted by Columbia River Basin salmon production. ATA, and many groups along the coast, will continue to advocate Mitchell Act funding and the forums necessary to develop a program worthy of the commitment made to our fishermen and coastal communities when the dams were built. We urge NOAA and the federal government not to walk away from that commitment.

ATA appreciates the opportunity to comment on this important issue. Don't hesitate to contact me if we can be of assistance on this or other matters of interest to commercial fishermen.

Best regards,

A handwritten signature in black ink that reads "Dale Kelley". The signature is written in a cursive, slightly slanted style.

Dale Kelley
Executive Director