Gus Rassam Barbara A. Knuth
Executive Director, AFS President, AFS
Professor and Chair,
Dept. of Natural Resources, Cornell University

The Honorable Wayne Gilchrest May 20, 2005
Chair, Subcommittee on Oceans and Fisheries
House Resources Committee
1324 Longworth House Office Building
Washington DC 20515

Dear Chairman Gilchrest:

We serve as the Executive Director (Rassam) and President (Knuth) of the American Fisheries Society (AFS). The AFS is the oldest scientific society representing the concerns of fisheries scientists and professionals. Our mission is to improve the conservation and sustainability of fishery resources and aquatic ecosystems by advancing fisheries and aquatic science and promoting the development of fisheries professionals. One of our twenty-two specialty sections focuses specifically on Fish Culture. Other Sections focus on Genetics, and on Fish Health. We publish the North American Journal of Aquaculture, and the Journal of Aquatic Animal Health.

Thank you for the opportunity to present testimony related to oversight of the National Fish Hatchery System (NFHS). The NFHS has the potential to play a critical role in helping to address future aquatic resource management challenges. We believe the NFHS will achieve this potential only by using the best possible science-based management principles and practices, and by recognizing that fish culture must be a part of a comprehensive approach to fisheries management and science that includes multiple disciplines (e.g., genetics, nutrition) and multiple management tools (e.g., habitat restoration, harvest regulation).

When evaluating the success of the NFHS, the emphasis must be on the quality of the fish produced, and the effects those fish have on larger fisheries management goals. The NFHS serves important purposes, providing a set of conservation tools and refugia for the restoration and recovery of declining species and enhancing recreational fisheries while other fishery management actions focus on rectifying habitat loss, overfishing, and other problems.

Members of the American Fisheries Society were involved in the development of the September, 2000 report, “Saving a System in Peril. A Special Report on the National Fish Hatchery System by the Sport Fishing and Boating Partnership Council’s National Fish Hatchery Project Steering Committee.” We reiterate the importance of the findings and recommendations of that report, and highlight particular improvements that are still needed in the operations and vision of the National Fish Hatchery System.

• The work of the NFHS should be conducted within the context of resource-specific, scientifically-based fishery management plans that articulate goals and objectives at national, regional, and state levels. Fish culture and broodstock maintenance are tools or means to larger goals, not ends in themselves. Further attention is needed by the USFWS to work with its cooperators to ensure development of scientifically-based and stakeholder-informed management plans, and then from these plans to identify the appropriate role for hatchery-produced fish to attain these goals and objectives. We encourage adopting fishery management goals and objectives that emphasize fisheries and aquatic ecosystem recovery, restoration, and conservation, including use of fisheries resources to derive an array of human benefits. We also recognize that USFWS has implemented a new fisheries program: “Strategic Plan for 2004-2008.” This planning document will guide a process for effective aquatic resource management within seven Focus Areas:
o Partnerships and Accountability
o Aquatic Habitat Conservation and Management
o Aquatic Species Conservation and Management
o Public Use
o Cooperation with Native Americans
o Leadership in Science and Technology
o Workforce Management
We agree with such a process that uses sound science and partnerships to protect America’s aquatic resources.

• Each NFHS facility should have a scientifically-based operational plan, with hatchery production objectives based on specific management plans (goals and objectives), and including discussion of appropriate genetic protocols; fish health and disease concerns; specific production goals (fish quality and quantity), production costs, and other criteria for success;

and clear plans for post-stocking monitoring of effects, positive or negative. The monitoring component of these operational plans should include procedures for determining the quality of fish stocked, the effects on natural populations, and the contribution of stocked fish to attaining the goals and objectives detailed in the corresponding fishery management plan for each given program. These operational plans should include adaptive management protocols that lead to improvements based on knowledge gained over time. The 2005 publication from the American Fisheries Society, "Propagated Fish in Resource Management" and its 1995 predecessor "Use and Effects of Cultured Fishes in Aquatic Ecosystems" are useful resources in preparing such operational plans.

• Hatchery managers and other personnel in the NFHS should be receiving continuing education and training to ensure they are up-to-date on current scientific understanding and information related to the operations of hatcheries and the role of fish culture in helping to achieve fishery management goals and objectives (e.g., innovative scientifically-based approaches that reduce potential for domestication selection). Hatchery staff should be encouraged to participate in appropriate professional and scientific meetings and organizations, read related scientific journals, and complete continuing education workshops on a regular basis. The American Fisheries Society stands ready to assist the leadership of the NFHS and the National Conservation Training Center at Shepherdstown, WV in helping to identify needs and strategies to meet those needs.

• An Organic Act for the National Fish Hatchery System could provide a much clearer mission and direction to the NFHS leadership and staff, and help clarify the role of the NFHS in restoring and maintaining native fisheries; rebuilding fish populations in areas where native populations have been lost or decimated due to habitat destruction or over harvest, supporting and enhancing recreational fishing, mitigating the effects of federally-funded development projects, and other responsibilities that would be articulated in such an Act. An Organic Act would help inform the description of an appropriate role for the NFHS in achieving the goals and objectives of fishery management plans noted earlier, and in informing the development of site-specific operational plans as suggested above. An Organic Act could also help clarify responsibilities of the NFHS that should be funded by the NFHS budget vs. other possible activities of the NFHS that should be funded by other sources on a user-pay principle. Congressional action through an Organic Act could help lay to rest some of the ongoing debates on these issues that have occupied valuable time and staff resources due to uncertainties about the mission, role, and limitations of the NFHS vis-à-vis other fisheries interests. Organic legislation should also strengthen the fisheries management offices that help to develop, implement, and evaluate the fisheries plans that guide the work of the National Fish Hatchery System.

• These recommendations apply to all three types of NFHS facilities, national fish hatcheries, fish technology centers, and fish health centers.

The American Fisheries Society stands ready to help with further discussions about the role and future of the National Fish Hatchery System, and to help provide scientific guidance through our network of members with expertise in this area. We believe Congressional attention to the NFHS is needed to prompt some necessary improvements, and we appreciate your efforts.

Sincerely,

Gus Rassam Barbara A. Knuth
Executive Director, AFS President, AFS
Professor and Chair,
Dept. of Natural Resources, Cornell University