



Mr. Steve Williams
Director, USFWS
3245 Interior Building
1845 C Street NW
Washington DC, 20240

July 12, 2003

Dear Director Williams:

The Montana Chapter of the American Fisheries Society (MCAFS) is an organization of professional fisheries scientists and students from agencies, universities, and the private sector across Montana. Our objectives are: conservation, development, and wise utilization of Montana's fisheries; promotion of the educational, scientific and technological development and advancement of all branches of fisheries science and practice; and exchange and dissemination of knowledge about fish, fisheries, and related subjects. Of particular interest to our membership is the long-term conservation of Montana's native fishes.

Our organization is very concerned with apparent lack of progress at implementing the recovery plan for endangered pallid sturgeon in the upper Missouri River Basin. At our 2003 annual meeting, we heard a panel of experts involved in recovery efforts provide a dismal outlook for the pallid sturgeon. The situation is dire enough that extinction seems imminent. We strongly appeal to you to take immediate action to ensure that the Recovery Plan is being implemented by a functional recovery team. Please consider the following :

Lack of a collaborative decision-making process and a non-functioning Recovery Team. The designated recovery team for pallid sturgeon is inactive, at best. The Team has not convened a meeting in two years. In these two years, priority tasks identified in the recovery plan have lain dormant. Rather than a constructive, collaborative approach to recovery, it appears that decisions are being made unilaterally, without regard to the expertise of the highly qualified network of fishery professionals on the Recovery Team. The lack of leadership, collaboration and cooperation among the upper basin working group has resulted in setting back sturgeon recovery and has created a very non-productive work environment for the group as a whole. This viewpoint is apparently shared by many professionals directly involved in the working group across agency boundaries. Given the critical state of pallid sturgeon in Montana there is no room for wasting time and resources. Please consider a review of decision-making processes and ensure that leadership, cooperation, and collaboration become integral in the recovery effort.

Lack of dedicated USFWS funding toward recovery of Pallid Sturgeon in the upper Missouri Basin and hatchery-related problems. The only source of funding for pallid sturgeon recovery efforts apparently comes from the Western Area Power Administration (WAPA). This "soft" money is simply not a reliable, long-term funding source for pallid sturgeon recovery. The USFWS has a responsibility to plan adequate out year budgets dedicated to the recovery of the species. The recovery program is focused on hatchery production and supplementation and yet

even this component is not adequately funded. We were informed that the Gavins Point National Fish Hatchery does not have sufficient capacity to hold the required number of brood fish, even though the manager of that facility has been requesting funding to expand that facility since 1993. Recent correspondence suggests that Gavins Point will run out of space for pallid sturgeon by the end of 2003 or 2004. If adequate space is not available, the primary goal of a genetically diverse brood stock cannot be met. Providing funding to support an effective multi-hatchery framework to produce healthy fish for stocking is an immediate concern. It appears there is an unacceptably high mortality rate associated with capture, handling, and spawning of wild fish during gamete collection. It also appears that the Garrison NFH has many fish health problems. Because of these issues, we cannot rely on Garrison NFH to produce pallid sturgeon of sufficient quality and quantity to sustain recovery efforts.

Habitat issues are priority for recovery. The pallid sturgeon Recovery Plan, issued in 1993, identified habitat loss as the primary cause of the decline of the species. Restoration of riverine habitat, emulation of the natural hydrograph, and restoration of the natural temperature regime were identified as the top three recovery measures in the Plan. However, 10 years later, precious little progress has been made on these issues and time is running out. Recent projections indicate both populations of wild pallid sturgeon in Montana will become extinct within 10-15 years. The artificial propagation program is fraught with difficulties and there are no guarantees it will be successful as a stop-gap measure to prevent extinction. Consequently, we believe that timely restoration of more natural river flows and temperatures is critically important in order to provide the remaining wild adult fish every opportunity to reproduce naturally before they disappear from the system.

Collection of viable gametes from adult fish in both recovery areas in Montana and the recent discovery of naturally produced pallid sturgeon larvae in the wild indicate the remaining adults are fully capable of producing viable progeny. It appears there has been a profound change in river habitat, which has eliminated successful natural recruitment for the past 40 years or so. Radio-telemetry and field observations of adult fish in both Montana populations during the spawning season over a period of several years confirm these fish do not make extensive mass upstream migrations (i.e. Bramblett and White 2001) and likely spawn in preferred habitats only a few miles upstream from major reservoirs. Laboratory studies of larval drift rates suggest any naturally produced larvae drift into downstream reservoirs, which apparently do not provide suitable rearing habitat. The recent discovery of naturally produced larvae near the headwaters of Lake Sakakawea tends to confirm this interpretation. Consequently, we believe the best way to encourage successful natural reproduction in the upper river is to restore appropriate flows and temperatures over river reaches of adequate length to allow natural drift and settlement of larvae. Alternatively, additional river miles could be re-created by substantially lowering reservoir operating pools, which is likely a far less palatable alternative.

We believe the 185-mile reach of the Missouri River from Fort Peck Dam to the Montana/North Dakota border within Recovery Area 2 represents the best possible remaining pallid sturgeon spawning and rearing habitat in the Upper Missouri. Much of this reach contains sandy substrates, which is preferred by pallids (Bramblett and White 2001) and this Recovery Area also contains one of the highest known remaining populations of wild adult fish. However, these fish make limited use of the "Fort Peck" reach, probably because of a radically altered hydrograph and temperature regime caused by cold-water releases from Fort Peck Dam.

We are pleased that the Fish and Wildlife Service has issued Biological Opinions that appear to obligate the Corps of Engineers to mimic natural flows (high in the spring, low in the summer) in the Missouri River. We are disappointed the Corps has failed to produce these flows and, in particular, failed to produce low summer flows in recent drought years, which could benefit pallids

and other sensitive native fish species in the river. Restriction of summer flows would also conserve water in Fort Peck Reservoir to hasten the arrival of a time when a “spring rise” could be produced. The perilous situation faced by the few remaining wild adult pallids dictates that a manipulated “spring rise” should be produced below Fort Peck at every opportunity over the next 15 years, rather than the “1 of 3” years proposed in the most recent Biological Opinion. We strongly urge the Fish and Wildlife Service to fully and forcefully exercise all of its authority to ensure these critically important flows occur as soon and as often as possible for the foreseeable future.

We are hopeful this letter will generate some productive dialogue among administrators, initiate some direct oversight of current pallid sturgeon recovery efforts, and initiate an investigation into direct actions which will improve the situation and set the recovery program back on course. We believe that these shortfalls in the recovery program under the leadership of USFWS are contributing to the accelerated extinction of pallid sturgeon in the Upper Missouri River Basin. Our organization is unwilling to stand aside and watch as administrative factors contribute to a profound loss of Montana’s natural heritage.

Thank you for taking our concerns into consideration and please inform us of your proposed actions in remedying this situation

Sincerely,

Patrick Byorth, President
Montana Chapter American Fisheries Society

REFERENCES

Bramblett, R.G., and R.G. White. 2001. Habitat use and movements of pallid and shovelnose sturgeon in the Yellowstone and Missouri Rivers in Montana and North Dakota. Transactions of the American Fisheries Society 130:1006-1025.

Cc: Ralph Morgenweck, Regional Director
Conrad Burns, U.S. Senate
Max Baucus, U.S. Senate

[Back to Chapter Correspondence Page](#)

[Back to MCAFS Home Page](#)