

**INDEPENDENT
MULTIDISCIPLINARY
SCIENCE TEAM
(IMST)**



State of Oregon

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November 7, 2002

Lindsay Ball, Director
Oregon Department of Fish and Wildlife
P.O. Box 59
Portland, OR 97207

Dear Director Ball:

The following are comments from the IMST on the latest draft of the Native Fish Conservation Policy and Guidelines, received by us last week. The IMST commented on an earlier draft of the NFCP in a letter to Ed Bowles on January 16, 2002 and March 14, 2002, and Carl Schreck and William Pearcy also commented via an email to C. Corrarino on the Draft Rules dated 09-10-02.

General Comments:

In general, the IMST agrees with the Draft Rules and believe that the policy is a good initial step toward the maintenance and recovery of naturally-reproducing native fishes and their ecosystems in Oregon. You, your department and the NFCP committee are to be complimented on the draft.

The present rules are policy, not science (Interim Measures have been deleted). Hence we do not have extensive technical comments. However, scientific input will be critical in the development and implementation of Species Management Plans (SMP). The success of the NFCP really rests with the adequacy of the SMP.

The Wild Fish Management Policy will be in effect for many years before all SMPs can be implemented. Therefore we suggest a review of this policy is appropriate during the interim period.

We believe that the NFCP should recognize the importance of the landscape perspective since many species have different habitats and requirements during different life-history stages. Recovery and maintenance of robust populations of wild fish depends on diverse habitats through time and space.

Besides placing priorities on conservation plans for ESA-listed species (see Conservation Plans 3(a)), robust species and populations should receive high priority to ensure that they do not decline.

Species Management Units and Plans (Plan Contents under Conservation Plans) need to be integrated with other Units and Plans for species that overlap in ranges and are sympatric in distribution.

Other Comments:

Definitions

17—fry may include recently hatched fish that do feed.

24—artificial is vague. It could include artificial stream conditions from revetments or placement of logs.

41—presmolt is the same as parr?

54—we suggest deletion of “continued” in this definition of supplementation.

55—AFS recognizes taxonomic species, but does not assign names.

Key Elements of the NFCP

5—In restoring..., the Department shall generally.... “Generally” is vague and could be qualified or deleted.

6—these are excellent guidelines!

7(b)-There should be a mechanism to address serious declines *before* research is initiated.

8—“consistent with conservation of naturally produced native fish species” is unclear.

Conservation Plans

3—See our general comment above on protecting strong and robust populations.

3(b)-What are the hatchery programs that “need substantial change”?

5(h)-Measurable criteria that indicate recovery should also be included.

6(c)-Diversity includes many attributes—phenotypic, genetic?

8—Although there are timelines given for formation of Units, none are given for the Plans.

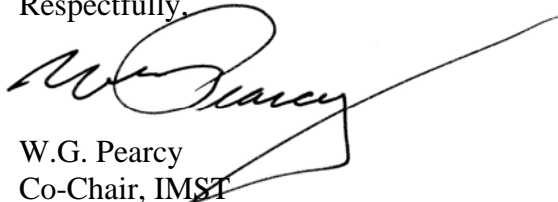
Native Fish Advisory Committee

1—The committee as planned has 6 members representing commodity users. More members from non-consumptive users seem appropriate to us.

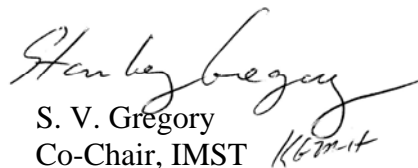
We hope that these comments are useful and can be considered by the Commission. Please let us know if you have any questions.

A formal letter will follow.

Respectfully,



W.G. Percy
Co-Chair, IMST



S. V. Gregory
Co-Chair, IMST