

**INDEPENDENT
MULTIDISCIPLINARY
SCIENCE TEAM
(IMST)**



State of Oregon

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March 14, 2002

Ed Bowles
Fish Division Directory
ODFW
2501 SW First Avenue
Portland, OR 97207

Dear Ed,

This letter concerns the information provided to the Oregon Fish and Wildlife Commission dated February 8, 2002, namely the Staff Report and the Draft Rules for the Native Fish Conservation Policy (NFCP). The IMST's comments on the draft NFCP were summarized in a letter to you dated January 16, 2002, concluding that successful implementation of this policy will require extensive scientific information and resources. After discussion with you and your staff at the January IMST meeting, we continue to endorse the recommendations and suggestions made in our January 16 letter.

The IMST believes that the NFCP has a strong scientific foundation. The sequence of steps outlined, from identification of species management units to monitoring and evaluation are logical, as are the attributes listed to measure fish performance. We also endorse your emphasis on ODFW's role 1) to establish sustainability standards that will guide basin planning, 2) to update the 1995 status review of wild fishes (not only salmonids) in Oregon, 3) to err on the side of conservation when scientific uncertainty is present, and 4) to promote effective integration of the NFCP with other state and federal agencies to accomplish native fish recovery as envisioned by the Oregon Plan for Salmon and Watersheds. Monitoring and evaluation, as indicated, will be necessary to assess management actions and their success.

Straying rates of hatchery fish and the proportion of wild and hatchery fish on spawning grounds are issues that will likely dominate in many basins. In this regard, it would be informative to document the degree of compliance with the Wild Fish Management Policy within basins. Although diminished performance of wild fish through interaction with hatchery fish is recognized on page 2 of the Staff Report, it does not appear under Issue 2 or in the Draft Rules. There is scientific support for the conclusion that genetic diversity of numerous populations of locally wild fish provide the best basis for recovery, and for the long-term sustainability of both wild and hatchery salmonids in the face of future environmental and climatic changes. Another key issue is the importance of individual populations vs. aggregated populations. Defining levels of risk for small populations will require detailed information on metapopulation structure which is currently not available.

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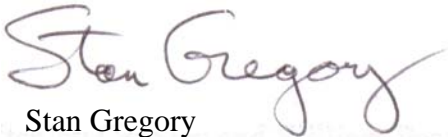
Specific Comments:

We envision that the NFCP will be applicable to all native fishes of Oregon, not just salmonids. For this reason, we suggest deleting "anadromous" on p.2, para.2. All native stocks are not anadromous, and all anadromous fishes are not native. In addition, it appears that this policy applies only to freshwater fishes and does not include saltwater species within waters (oceans and estuaries) managed by the State of Oregon.

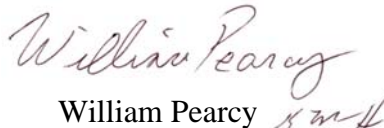
p. 4, Issue 2—More scientific knowledge about a particular species or population does not necessarily provide for greater potential for flexibility, e.g. ESA-listed species, as indicated in the second paragraph.

The Native Fish Conservation Policy is an ambitious and important initiative to restore native fish populations of Oregon. Please let us know if we can be of further help.

Sincerely,



Stan Gregory
Interim Co-Chair, IMST



William Percy
Interim Co-Chair, IMST

cc: OFWC
Kay Brown, ODFW
Neal Coenen, GNRO
IMST