25 May 2001

Mr. Ed Bowles
Oregon Department of Fish and Wildlife
P.O. Box 59
Portland, Oregon 97207

Re: Comments on ODFW Native Fish Conservation Draft from the Oregon Chapter of the American Fisheries Society.

Dear Mr. Bowles:

When the Oregon Department of Fish and Wildlife (ODFW) put in place a policy related to wild fish management a decade ago, it was quite innovative for a resource management agency. After ten years of management experience with those policy standards, new scientific information in hand, and new conservation requirements imposed by federal Endangered Species Act listings; it seems entirely appropriate that ODFW should review its policy direction and revise it as needed.

We therefore applaud ODFW for again stepping forward to deal with the issue of native fish management and particularly for its apparent intent to adhere to a reasoned scientific approach to hatchery management. As you are likely aware, the Oregon Chapter of the American Fisheries Society has recently published a "white paper" on the subject of "Managing Wild and Hatchery Fish in Oregon," I have enclosed a copy for your perusal, and it's also available on our website at: http://www.orst.edu/groups/orafs.

We strongly support a policy that seeks to focus beyond the immediate availability of interim tools (be they hatcheries, harvest management variations, or other short-term tools) to resolve the root causes of species decline. Indeed it is admirable that the ODFW draft policy recognizes the critical link between the successful application of such tools and the maintenance of native wild fish stocks as a genetic foundation for sustainable programs. The current (and foreseeable future) state of our knowledge of the relationship between specific genetic makeup and evolutionary fitness is simply too rudimentary to assume that we, either as politicians or professionals, can 'outperform' evolution by manipulating stock genetics to 'fit' any particular set of current environmental conditions—especially if we are simultaneously seeking to improve those very same conditions (e.g., flow patterns, temperature regimes, habitat structure, watershed dynamics, and so on).

We do, however, have some concerns about the draft policy:

First, that in the attempt to lend flexibility to state policy (an admirable goal), the draft policy has moved too far toward forfeiting state agency authority and may lose sight of the need for accountability—in essence, trading an existing scientific framework that has reasonably defined standards for a rather loosely defined process with no clear conservation goal or identifiable entity with whom accountability lies. As a specific example, current specific standards are proposed to be replaced with risk assessments, but the risk assessments are defined so generally that it is difficult to tell what they are. Public accountability might be better served by retaining some of the specifics while we agree to work together towards a more inclusive or refined solution later. The consensus building approach referred to in the draft policy is an important tool and nearly always puts important issues on the table that may not have otherwise arisen. However, as many of our members have learned in carrying out their jobs as aquatic resource professionals, it is also important to remember the scientific and statutory sideboards and not allow division among varied publics lead to a failure to make clear and supportable decisions. In short, the public expects ODFW to continue to show scientific and management leadership in native fish conservation, even when it's controversial, and not default to 'finger in the wind,' politics-driven decision making.

Our second concern is that the draft policy also misses opportunities to propose needed updates to the previous policy. The most significant of these is the need to broaden the previously exclusive focus on salmon management and artificial propagation. While salmon management and the associated application of artificial propagation is a major issue and a major source of controversy, there are a number of other management challenges faced by ODFW. White and green sturgeon, depleted populations of coastal marine fishes, and strategies for protection and management of the complex of native minnows, suckers and other species are examples that come to mind. In addition, the emphasis here on hatchery-based solutions to conservation problems is a bit surprising given the policy's explicit recognition that this is an interim tool rather than a long-term solution to root causes. As the Independent Scientific Advisory Board recently observed, success stories for supplementation are quite limited at this time.

Our third concern is on the use of best science. The draft rightly stresses the application of best science but seems only to equate that with the gathering of new information, initiating new research keyed to data gaps, and creating sideboards through collaborative processes***. The most obvious need is to apply existing scientific knowledge.*** There is a great deal of information already available, especially on salmon management and propagation. It needs to be analyzed and applied to present management decisions and strategies. There is no reason to substitute political judgments for analysis when so much information is at hand and not yet applied. For example, there have been many tools developed in recent years for the conduct of risk assessments that can be readily applied to evaluation of alternate management strategies. This approach is being integrated into federal rules on the management of ESA-listed species. There is a missed opportunity to use a similar approach to improving management decisions.

Our final concern is the mixing of information gathering and decision making. As briefly noted above, the emphasis on identifying management flexibility through consultative processes has some inherent strengths. This approach affords time to think during a highly politicized situation, may better educate people, and may help move toward consensus. But this approach may also focus on preconceived solutions and is, therefore, less likely to effectively address the many management

conflicts and depleted population problems in a timely manner. It may also raise unrealistic public expectations and further fuel the controversies it is trying to address. It may be best to decouple collection and analysis of information from management decision-making. That is, first define the problem, the available options, and assess the probable results of alternative strategies, then allow a public decision-making process to choose among the alternative approaches and outcomes. As we all have unfortunately witnessed, science is misused when a desired outcome is identified first and then information is assembled to support it.

In closing we would again like to applaud ODFW for the effort it has made to evaluate and update its guiding policies and we offer our continued assistance as this draft progresses to the level of detail that will be needed before it is finalized. If you have any questions please feel free to call either Denny Lassuy at 503-872-2763 or me at 541-750-7018.

Sincerely,

David B. Hohler
Past President, for the Executive Committee