American Fisheries Society
Oregon Chapter
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November 28, 2005

Mr. Kevin Goodson
Oregon Department of Fish and Wildlife
3406 Cherry Avenue N.E.
Salem, Oregon 97303

Dear Mr. Goodson,

This letter provides comments on behalf of the Oregon Chapter of the American Fisheries Society on the Oregon Department of Fish and Wildlife's public review draft of the "Oregon Native Fish Status Report 2005." The Oregon Chapter of the American Fisheries Society is comprised of over 450 fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, and diverse private employers, including students and retirees. The Chapter was established in 1964 as part of the American Fisheries Society. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse concerning fisheries and aquatic science and by promoting the development of fisheries professionals.

The Oregon Native Fish Status Report is an impressive consolidation of data and analyses that evaluates the current status of native fishes in Oregon. We believe this report will be valuable for not only directing Oregon's conservation planning efforts, but also for our members, other agencies and organizations, and the general public interested in knowing how Oregon's native fish are faring. We found the overall format of the report particularly useful. Volume I contains a summary of findings that condenses information into a format that can be readily understood for those interested in a "snapshot" view of the status of Oregon's fishes. Volume II contains considerably more of the specific information and assessments to back up the summaries for those wanting more details. The layout of the document with all the colorful graphics, distribution maps, and summary text boxes was also impressive. It's clear that considerable thought and planning went into the genesis of this document and the end results show these efforts.

The primary intent of this report is to assess the near term (5-10 years) risk of the Species Management Unit (SMU) in its immediate status. An evaluation of the long term risks facing the sustainability of the SMUs was not conducted. The interim criteria and standards used for this near term risk assessment were clearly described. With this

understanding, there were a few instances we noticed where populations passed all of the criteria, yet the information presented indicated the particular population may be at some elevated risk level in the near term. These particular populations had low abundances (less than 300 fish) in many years of the available data set. It would seem these populations would be at some elevated risk even if the specified criteria used in the report were met. The conditions leading to this type of situation seemed to occur when 1) the population has exhibited an overall decline in abundance over the last 10-30 years, 2) average abundance of the population over the last decade or so has been low (i.e. less than 300 fish in the population, 3) the population has seen recent increases in abundance the last 3-5 years that led to the population passing the abundance criteria. An example of this concern comes from the South Umpqua River spring Chinook population. As shown in Table 33, page 84 of the Volume II report, the 30 year average abundance for this population is 176 fish. Using the report's abundance criteria of "number of naturally-produced fish is greater than 25% of average abundance of naturally produced spawners over the last 30 years in at least 3 of the last 5 years" the run would have to be *less* than 44 fish in three of the last five years for this population to *not* pass this criteria. The specified abundance criteria do not seem to work well for populations at chronically low levels. This population, because of such low numbers, is at significant genetic and demographic risk now. Establishing a minimum number of fish for a population (say 300 fish for larger populations) in addition to the existing abundance criteria quoted above seems to be biologically justified. This would acknowledge that any population that has less than, say, 300 fish in recent years would be at some near-term risk.

We also found the status assessment for select "non-game" fishes such as dace, chub, suckers, and sculpin to be of interest. As noted in the report, little information has been published on the status of these species, even though these fishes can provide a valuable indicator of the health of Oregon's river ecosystems. There may be more information for these species that has been collected by other agencies and organizations that would be useful to collate into ODFW's report. ORAFS would be willing to work with ODFW to seek out additional information from our members if you are interested. Our Information Sharing Networks and/or Natural Production Committee could be of assistance.

The report also identified many fish stocks that are now extinct. Including these extinct populations of fish is very important to make clear the fishery resources that have been lost over time. With regard to this, for the Oregon Coast summer steelhead SMU, historical information seems to suggest a run of summer steelhead also existed in the South Umpqua River Basin, but there was no mention of this extinct population. Information included in a report by Roth (1937) suggests there were two distinct runs of steelhead passing South Umpqua Falls. He observed steelhead spawning in February and March (winter run), but also observed steelhead passing the falls in June and early July. These fish were most likely summer run. It certainly seems likely that a summer run of steelhead occurred in the South Umpqua River historically, especially given the cool summer water temperatures reported by Roth (1937) and the extensive amount of Cascade Range habitat available in the headwaters (similar to the North Umpqua and Rogue).

It was noted that some of the population boundaries and SMUs identified in the report were different than what NOAA Fisheries and the Technical Recovery Teams have come up with for listed salmon and steelhead. For recovery planning efforts by NMFS and conservation planning by Oregon, it would seem desirable to have consistent populations and SMU/ESUs. An example is Clackamas spring Chinook. The status report includes this population in the Lower Columbia spring Chinook SMU (along with the Sandy and Hood populations). However, under the federal Endangered Species Act listing, the Clackamas population is included with other populations in the Willamette above the falls (the Willamette spring Chinook ESU). The Sandy and Hood populations are in a different ESU (Lower Columbia Chinook ESU). Having differences like this would seem to complicate future planning efforts.

Lastly, as you are probably aware the report needs some editorial revisions. There were some errors with header labels indicating the wrong sections and some discrepancies between population boundaries between Volume I and Volume II reports (e.g. Umpqua River fall Chinook).

Thank you for the opportunity to comment on this important status review document. If you have any questions about our comments, don't hesitate to contact me or Lance Kruzic of the Natural Production Committee. Please let us know if we can help in any way with future work.

Sincerely,

Barry McPherson
President, Oregon Chapter
American Fisheries Society

Literature Cited

Roth, A.R. 1937. A survey of waters of the South Umpqua Ranger District Umpqua National Forest. U.S. Department of Agriculture Forest Service. (Copy available from ORAFS member Lance Kruzic).