



Native Fish Society  
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Portland, OR 97280

*Fighting for the Future of Native Fish*  
Conserving biological diversity of native fish and protecting their habitats

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October 31, 2008

Dear ODFW Commissioners:

I have read with interest the Mid-Columbia Recovery Plan for Steelhead in Oregon subbasins. Without reservation, I believe this draft plan is one of the finest examples of staff work. It is a comprehensive science based recovery plan.

The standards, criteria and objectives are sound and I am writing to encourage the Commission to adopt this recovery plan. In doing so, however, I believe it is important to adopt as rules some critical aspects of this plan.

Specifically I would support adoption by rule the delisting goal and criteria in section 5.1 on page 5-1. This would include the fish population viability criteria as defined by the Interior Columbia TRT and the levels of biological viability as defined by the same for delisting criteria.

This sections states: “Our primary goal is to support removal of the Mid-C steelhead DPS from the threatened and endangered species list. This requires that the populations must reach the levels of biological viability defined by the ICTRT and adopted by the State of Oregon in this plan as delisting criteria. In the context of recovery, delisting criteria and viability criteria are considered synonymous. Achieving ICTRT biological viability status at the population and MPG levels is needed before the DPS can be considered at low risk or extinction and a candidate for delisting.” (page 5.1)

This direction sets the stage for a logical science based process for recovery that is transparent. Progress can be tracked and success can be defined. If there are problems, the monitoring and evaluation would allow adjustments to solve problems. Because of these virtues, I encourage the Commission to adopt rules that will set the stage for effective recovery action.

In addition, I encourage the Commission to also adopt by rule the Recovery Objectives in section 5.1 on pages 5-18 and 5-19. This would provide a firm commitment by the State of Oregon to recovery Middle Columbia River steelhead by establishing the state’s vision for recovery, based on defined objectives.

Oregon has made a strong commitment to resolving hydro-dam impacts on ESA-listed salmonids in the Columbia River. By adopting the Mid-Columbia steelhead plan criteria and objectives as state policy, Oregon will be making an even stronger commitment to recovery by including a science based recovery plan for Oregon subbasins.

The Mid-Columbia steelhead recovery plan is consistent with Commission policy, the ESA, and with other states and tribes. I am reminded of Governor Kulongoski’s statement in July when he

said: “*What I am looking for is a plan that restores wild fish populations to viable and sustainable levels.*” While this statement was directed at a different plan, it holds true for the Mid-Columbia steelhead recovery plan as well. We need viable and productive runs of wild steelhead in Oregon tributaries and a hydro-system that safely passes these fish to the ocean and back.

Sincerely,

Bill M. Bakke,  
Executive Director