

THEODORE R. KULONGOSKI
GOVERNOR



April 27, 2009

Independent Multidisciplinary Science Team
c/o Oregon State University
Department of Forest Science
321 Richardson Hall
Corvallis, OR 97331-5752

Co-Chairs Schreck and Molina:

The State of Oregon has completed the Draft Lower Columbia River Domain Conservation and Recovery Plan (Plan) for Salmon and Steelhead. The draft Plan was prepared by the Oregon Department of Fish and Wildlife (ODFW) with input from Planning and Stakeholder teams comprised of federal, state, regional and local government representatives; watershed councils and other conservation groups; agricultural, forestry, fishing, utility and other commerce interests; and Tribes. This plan serves as the Native Fish Conservation Plan for ODFW as it meets Native Fish Conservation Policy (NFCP) guidelines. This plan has been developed consistent with recovery plan requirements developed by the National Marine Fisheries Service.

As specified in the Native Fish Conservation Policy (NFCP), the ODFW shall "...solicit the assistance and independent peer review by scientists including but not limited to the Independent Multidisciplinary Science Team and university fishery management programs...". However, given the extremely limited IMST budget for the remainder of this biennium, it is my understanding that IMST members have agreed to conduct this review *pro bono*. Therefore, it is not the State's expectation, but the IMST's choice, to do this review.

The State of Oregon will provide hard copies to the review subcommittee and CDs to all IMST members in late April. Given the uncertainty with budgets in the '09-'11 biennium, it would be prudent for the IMST to strive to review the document and provide comment before the end of the current biennium (June 30, 2009). The State recognizes this is a very aggressive schedule for the Team.

As you would expect, the Plan is a voluminous document (nearly 900 pages), and includes the following completed chapters and associated appendices.

- (Title Page)
- Table of Contents

- Abbreviation List
- Executive Summary
- Chapter 1 - Introduction
- Chapter 2 - Environmental and Biological Background
- Chapter 3 - Conservation and Recovery Goals, Criteria and Analyses
- Chapter 4 - Current Status and Conservation Gaps
- Chapter 5 - Limiting Factors and Threats
- Chapter 6 - Desired Status
- Chapter 7 - Strategies and Actions
- Chapter 8 - Research, Monitoring, and Evaluation
- Chapter 9 - Implementation
- References
- Appendices

The plan is a true draft and has a few elements that need additional work. The Time and Cost Estimates in Chapter 7 are incomplete and, therefore, not included in the document. There is some additional editing that needs to be done to address consistency and readability.

Please review the Plan for its scientific foundation as called for in the NFCP. The following context for review should be considered in conducting your review. This context was developed by the LCR Joint Science Team and was provided to the NOAA review teams that reviewed the previous draft of this Plan.

Planners were able to use only available data, which in many cases severely limited options for quantitative analysis. Even in cases with limited data, reviews should still evaluate whether existing information is used in a way consistent with "best available science." Practical recommendations for plan improvement should recognize no new data will be available during the revision process, which will take place over the course of months rather than years. If reviewers are aware of relevant existing data that were not used in plan development that should obviously be highlighted.

Time constraints also need to be considered in making recommendations for plan improvement. Plans were developed with fairly restrictive time limitations, so reviews should consider whether methods were appropriate given the amount of time available. Time will also be limiting for plan revision, so recommendations for plan improvement should identify whether the recommendation could be incorporated in the plan within a few months or whether the recommendation would need to be incorporated as part of future adaptive management. Recommendations for analyses that would make a good 5-year Ph.D. dissertation project could be included in the plan's recommendations for

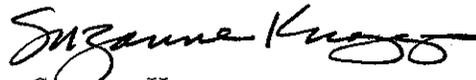
future research, but are realistically not going to be completed for plan inclusion in the near term.

Recognizing the data and time constraints under which the plans were developed should not reduce the expectation for scientific rigor. The conclusions need to follow logically from the data, analysis and results. All relevant data should be considered. The analyses methods need to be appropriate for the questions being asked, and reflect contemporary approaches. Analyses should be competently executed and clearly presented. In other words, "best available science" standards still apply.

The review should include only scientific (biology, hydrology, etc.) and, where applicable, economic considerations. The review should not consider political factors related to the feasibility of implementing the plan. Management implementation issues will be considered in a separate review process. An economic review will be needed of the cost estimates associated with some of the plans.

The State of Oregon appreciates the IMST's willingness to review Oregon's draft Lower Columbia River Domain Recovery Plan for Salmon and Steelhead. Please feel free to contact Dave Jepsen (david.jepsen@oregonstate.edu), Kevin Goodson (Kevin.W.Goodson@state.or.us) or myself (Suzanne.knapp@state.or.us) should you have any questions or need further clarification.

Best Regards,



Suzanne Knapp
Policy Advisor
Governor's Natural Resources Office

c: Dave Jepsen, Oregon Dept of Fish and Wildlife
Tom Stahl, Oregon Dept of Fish and Wildlife
Kevin Goodson, Oregon Dept of Fish and Wildlife