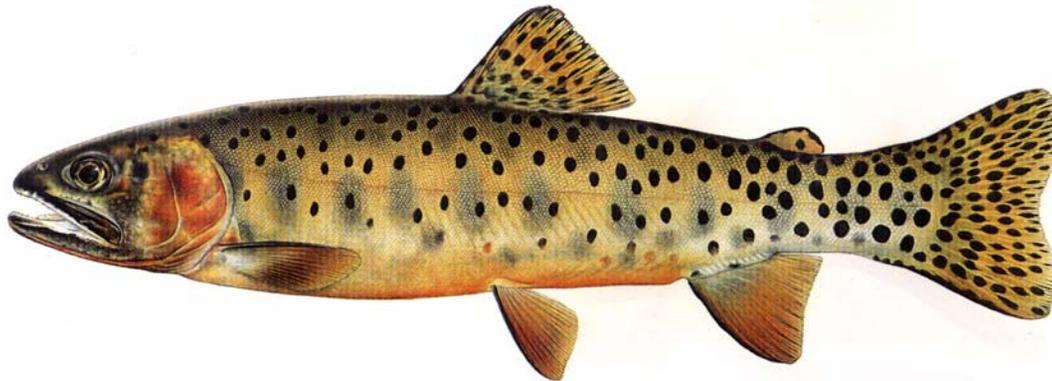


AN ANALYSIS OF THE WITHDRAWAL OF A PROPOSED
RULE TO LIST THE LOWER COLUMBIA RIVER/
SOUTHWEST WASHINGTON DISTINCT POPULATION
SEGMENT OF THE COASTAL CUTTHROAT TROUT



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SIMILARITY OF INFORMATION IN THE STATUS REVIEW, PROPOSED LISTING AND WITHDRAWAL



Population Size



Population Trend



Life history plasticity



New protective regulations and analysis of threats



Population Size



Withdrawal of the proposed rule lumps resident and anadromous forms to conclude populations are healthy.

- Cites WDFW surveys that found densities comparable to Olympic Peninsula and Puget Sound.

- These surveys did not separate resident and anadromous fish.



NMFS' noted similar densities of resident forms, but still concluded DPS should be listed based on status of anadromous populations:

- “Coastal cutthroat trout, especially the freshwater form, may still be well distributed in most river basins... Severe habitat degradation throughout the lower Columbia River area has contributed to dramatic declines in anadromous cutthroat populations.”



Population Size



Other “new information” in the Withdrawal is similar to information considered in the status review.

--The Withdrawal, for example, concludes “Five of these traps have counts (averaged over the last five years) of 50 to 1,400 adult cutthroat trout per year. These data indicate higher numbers than previously described and we no longer conclude that the annual number of adults returning to these traps are consistently below 10 fish.”



Similarly, the NMFS’ status review noted five year geometric mean counts of 4 in the Kalama, 33 in the Hoquiam, 50 in the North Fork of the Toutle, and 1,400 in the Cowlitz. Data in the status review shows 4 of 9 populations had counts under 10 and 7 of 9 had counts under 200.



In sum, there is not new information that contradicts NMFS’ conclusion that numbers of anadromous fish appear to be very low:

--“The BRT was concerned about the extremely low population sizes of anadromous cutthroat trout in Lower Columbia River streams”.



Population Trend



In the lower Columbia, the withdrawal does not present any new information to show that populations are stable, but rather states that the magnitude of declines can't be determined and casts doubt on existing data:

“There are indications of declines in the anadromous component of the adult portion of the population in the Columbia River, though the rate of decline is uncertain due to concerns over the reliability of the analyses and potential biases in the dataset.”



In Grays Harbor, the Withdrawal determined that observed declines in the Hoquiam were no longer statistically reliable, presented new information on an increasing trend in adults in Bingham creek and information from one angler who kept a diary that showed increasing catch.

--NMFS did present data showing increasing smolts in Bingham Creek and presented data from one additional Creek showing decline.



Again, nothing in the withdrawal fundamentally contradicts NMFS' finding that the anadromous population has declined.

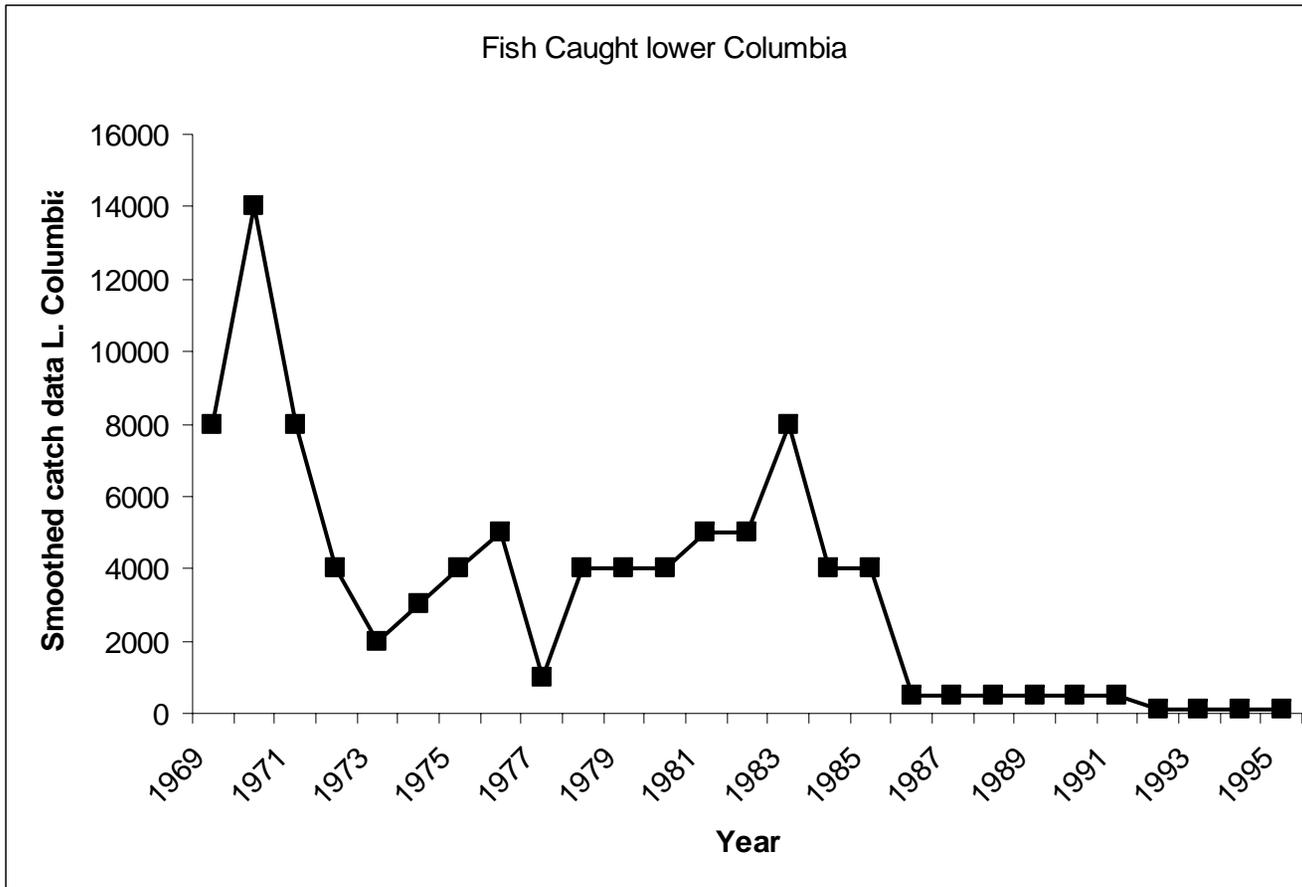


Table 1. Creel data from Hooten (1997) for the lower Columbia River in Oregon.



Life History Plasticity



The Withdrawal is based in large part on findings that resident forms of Coastal Cutthroat can sometimes produce smolts:

--“The fact that they continue to produce smolts after long isolation suggests that even if the anadromous portion of the population continues to experience low number and declines, smolts will be produced that can supplement the anadromous portion of the population and take advantage of any improvement in anadromous habitat (e.g., ocean, estuary, mainstem rivers).”



NMFS' status review fully acknowledged that residents can produce smolts:

--“The BRT believed that smolt production by freshwater forms does occur, but that it has not resulted in demonstrably successful reestablishment of anadromous forms. Habitat degradation in stream reaches accessible to anadromous cutthroat trout and poor ocean and estuarine conditions probably have combined to severely deplete this life-history form throughout the Lower Columbia River Basin. Without the appropriate freshwater and estuarine habitat for expression of the anadromous life history, a greater risk of extinction may occur.”



New Protective Regulations and Analysis of Threats



“This withdrawal is based on: (6) two large-scale Habitat Conservation Plans (HCPs) and significant changes in Washington Forest Practices Regulations substantially reducing threats to aquatic and riparian habitat on forest lands in Washington.”



In drawing this conclusion, FWS never analyzed to what extent the anadromous portion of the population was protected, nor did they consider the extent of threat to the anadromous population. To the contrary, they repeatedly made statements similar to the following:

--“Despite the long-term, widespread impacts to aquatic and riparian conditions, coastal cutthroat trout have survived in all portions of the DPS for many generations, and apparently remain at densities comparable to healthy-sized populations elsewhere.”



Why should we be concerned solely with the status of the anadromous portion of the population?



Anadromous populations may be locally adapted to specific streams and thus difficult to recover.



Anadromous populations allow for genetic exchange and re-colonization of habitat, maintaining meta-population dynamics.



For these reasons, NMFS' status review concluded:

-- "A significant risk factor for coastal cutthroat trout in this ESU is reduction in life-history diversity."



Why should we be concerned solely with the status of the anadromous portion of the population?



In support of this conclusion, an “Independent Scientific Advisory Board established by the Northwest Power and Conservation Council recently concluded:

“To be viable an ESU needs more than simple persistence over time; it needs to be in an ecologically and evolutionarily functional state. Evaluation of ESU Viability should not only rest on the numbers of component populations or on the abundance and productivity of those individual populations, but also should be based on the integration of population dynamics within the ecosystem as a whole. This concept of ESU viability does not accommodate the loss of populations or the anadromous or resident life history form from any given ESU, because that loss would represent a loss in diversity for the ESU that would put its long-term viability at risk.”



Based on a questionable interpretation of the Aleva Valley Decision, FWS is moving away from protection of unique genetic lineages, populations or life history strategies .



Withdrawal of proposed rule appears to have been framed by a similar policy decision that was made above the level of the biologists who wrote the rule.



There appears to be a growing disconnect between management of Cutthroat Trout and scientific consensus about what is necessary to maintain their viability.