

“BULLET POINTS”

IMPORTANT FACTS CONCERNING THE DFG DELISTING PROPOSAL TO NOAA FISHERIES

1. In answer to a suit requiring that NOAA Fisheries count both resident and hatchery rainbow trout, as well as sea-run Steelhead trout, in June, 2004 NOAA Fisheries filed a Federal Register notice that it would reconsider its salmon and steelhead listings in 27 West Coast Evolutionarily Significant Units (ESU's). Among these were the listings in the Central Valley, California ESU for winter-run salmon and Steelhead trout.
2. NOAA Fisheries preliminary position was that it would reclassify Central Valley winter-run Chinook salmon from endangered to a less protective “threatened” listing but would continue to list (sea-run) Steelhead trout as “threatened”.
3. On November 12, 2004 DFG Director Bryan Broddrick sent a letter to NOAA Fisheries asking that winter-run salmon continue to be listed as “endangered” and Steelhead be delisted. He also asked that the ESU be divided at Stockton (presumably so that the San Joaquin River portion of the ESU might be separately listed ... where salmon and steelhead need oxygen tanks and desert boots to move from the Delta to where they can survive).
4. In arguing that winter-run should not be reclassified, his letter stated that not enough time had elapsed to be sure that the winter-run population increase was long-term. He cited future planning by Federal agencies which might result in conditions which would be adverse to the winter-run salmon.
5. Director Broddrick's letter used none of these same defenses in advocating Steelhead be delisted, even though both species are temperature sensitive, both “summer-over” in the river and both are designated as “threatened” under the Federal Endangered Species Act.
6. The letter failed to note that a professional committee of NOAA had recommended that Central Valley Steelhead be listed as “endangered” when originally listed.
7. In arriving at their de-listing recommendation DFG has used methodology which has been found scientifically unsupportable by the American Fisheries Society, an organization of professional fisheries biologists.
8. The American Fisheries Society (AFS) has urged that the “threatened” listing Steelhead continue.
9. Five of California's most active sport angling organizations have joined in opposing delisting of Central Valley Steelhead.
10. California Advisory Committee on Salmon and Steelhead Trout has asked DFG to respond to AFS and Sport Angling group concerns.
11. The Resources Agency Secretary, Mike Chrisman, and the Director of DFG recognize C.V. Steelhead are in trouble. They want to delist in spite of this.
12. Governor Schwarzenegger has failed to respond to our request that his administration publicize a policy position favoring protection and enhancement of C.V. Steelhead Trout

(See www.nccff.org for full documentation. Note Table of Contents for added comment)