

# DRAFT

## *[TO BE PUT ON PNAMP LETTERHEAD]*

May 26?, 2006

Dr. Tom Karier, Chair  
Northwest Power and Conservation Council  
851 SW Sixth Avenue, Suite 1100  
Portland, OR 97204-1348

Dear Dr. Karier,

On behalf of the Pacific Northwest Aquatic Monitoring Partnership (PNAMP) I am pleased to submit comments on the Northwest Power and Conservation Council (Council) Document 2006-4, "Draft Guidance for Developing Monitoring and Evaluation as a Program Element of the Fish and Wildlife Program" (Guidance), dated March 2006.

The draft Guidance represents a significant undertaking by the Council. We appreciate your consideration of the substantive changes in approach to monitoring and evaluation that will be needed to improve the effectiveness and efficiency of monitoring and evaluation efforts in the Columbia Basin associated with the Council's Fish and Wildlife Program.

Interest in tracking and evaluating progress and performance of conservation and recovery efforts has increased considerably in recent years. In 2003, federal, state, and tribal governmental entities came together as PNAMP, a self-formed collaboration whose purpose is to improve coordination of monitoring concepts and activities aimed at important scientific information at the appropriate scales needed to inform public policy and resource management decisions. The geographic area of PNAMP ranges from Northern California to the Canadian border. As stated in the PNAMP charter "...monitoring will be improved if: all programs use consistent monitoring approaches and protocols; follow a scientific foundation; support monitoring policy and objectives; and collect and present information in a manner that can be shared." Pertinent provisions of the charter recognize "that partners will decide their own management questions", and "that partners will make reasonable efforts to incorporate PNAMP recommendations into their respective programs."

With the above in mind, the comments contained herein are oriented to the following elements:

- consistency of the draft Guidance with PNAMP's guiding principles, 2004 "Considerations for Monitoring in Subbasin Plans", and 2005 "Strategy for Coordinating Monitoring of Aquatic Environments in the Pacific Northwest" and
- consistency of the draft Guidance regarding its expectations of PNAMP.

Although the Council is a member of PNAMP and your staff has been an active participant in PNAMP, they did not participate in the preparation of these comments.

### General Comments

In general, the draft Guidance is comprehensive in defining key elements of a programmatic monitoring program, and is consistent with available PNAMP strategic guidance and recommendations.

However, after developing the background and context, Chapter III provides relatively little direct guidance on how to select projects or to phase program elements to implement the proposed program, or what project sponsors should or must do to contribute to the program in the present or future rounds of project solicitation.

We note that in a key instance the draft Guidance appears to overstate the current status of the PNAMP “monitoring framework,” and the prospective role of PNAMP in implementing it. The PNAMP effort to develop a framework is continuing and, although activities associated with coordination are clear, PNAMP’s role in implementation of the framework has not clearly been assigned to PNAMP by its policy executives.

Finally, due to the volume of material presented in the Guidance and some redundancies (e.g., between Chapters II and IV), some unevenness exists that make it at times difficult to clearly see all of the key elements and their interconnections.

Again, we recognize the major complexities of the task and complement the Council for the progress manifested in the draft.

### Specific Comments

The following specific comments are organized by Chapter and page number.

#### *Chapter I*

Pg 6: **Pacific Northwest Aquatic Monitoring Partnership** – The paragraphs describing PNAMP are generally accurate. However, the last sentence of the final paragraph tends to overstate the currently chartered role of PNAMP. It might be more appropriate to state that “PNAMP is a key forum for *informing* the regional framework...described in Chapter II” or that PNAMP *can be* the key forum for implementation of the regional framework...described in Chapter II.” Direction to perform these roles and capacity to address them is the purview of PNAMP executives.

Pg 7-8: **Collaborative Funding** – This section states “...it is incumbent upon members of PNAMP to develop and implement incentive strategies.” This seems to single

out PNAMP. Implementation incentives are an important topic, but they have not been brought forward by PNAMP. It would be fairer to say that incentives for implementation will be keys to success, and that entities with stakes and interests in success (PNAMP, members, and others) should develop and apply options. To date, this has not been an active area of activity for PNAMP, subject to direction and resolution of capacity needs by PNAMP executives.

Coordination focused on common interests has many facets, both technical and non-technical. It may help to broaden the examples to include state, tribal and federal/Federal Caucus monitoring programs and coordination.

Pg 8-10: **Data Management** – PNAMP strongly supports the guidelines at the end of this section with regard to use of a data network that provides accessibility of information.

### **Chapter II**

Pg 11: **Management Questions and the Need for Supporting Data** – The last sentence of the first paragraph would be more accurate if it read “...a monitoring framework *being developed* by PNAMP *that will inform...*”

Pg 13: **What are High-Level Indicators?** – In PNAMP’s use of the term, it is critical that the definition of high-level indicators orient first to the needs of high-level audiences (e.g., Congress, Legislatures, Governors, public), depicted at the top of the information pyramid shown in Figure 2. The current definition addresses scale, but not this target audience.

Resolution of high-level indicators should lead to information that could be used by any interested party, not just PNAMP members.

Pg 16-17: **Fish and Wildlife Program Projects: the Building Blocks of Regional Monitoring** – Management questions provide a good framework within which to orient to types of monitoring and the types of activities generally appropriate to address them. However, how this information relates to specific projects (as building blocks) could be more clearly described.

### **Chapter III**

Pg 19: **Using the Project Selection Process to Implement Monitoring** – The title of this chapter might be more accurate if it were edited to “...to Implement *and Sequence Monitoring Efforts.*” This would increase the connection to the use of a “phased approach” as suggested in the text.

**Developing a Monitoring Component of the Fish and Wildlife Program** – This section proposes a monitoring network and suggests it will “support *triennial*

reporting of results...”. It should be clarified how this relates to the staff recommendation for “an *annual* report...summarizes...high level indicators...” under **Reporting** on page 25.

Pg 22: **2a Watershed Condition Data Funded Through the Program** – The first sentence of this section refers to “Where projects are prioritized...focused on priority indicators...”. However, it is unclear how this serves the objectives of programmatic monitoring, unless project sites are part of a programmatic monitoring design (not stated).

**2b Aquatic Habitat Project Effectiveness** – This section appears to confine evaluations of habitat project effectiveness to watershed-scale Intensively Monitored Watersheds (IMWs). However, in the category of project effectiveness, the PNAMP strategy also includes complementary programmatic evaluations of site or reach-scale effectiveness of categories of habitat projects, sampled from the broader pool of projects (e.g., as in Washington and Oregon). The draft Guidance should clarify whether the intent is to limit project effectiveness to IMWs, or whether a separate but complementary programmatic project or reach-scale effectiveness element is included.

#### ***Chapter IV***

Pg 26: **Program Evaluation Requires Broad Range of Monitoring** - Prioritization of effectiveness evaluations and other activities is challenging. It is an overstatement to say that PNAMP (and perhaps other entities identified in this paragraph), “have identified priorities...for effectiveness evaluations.” Some entities may have, some may not, and some may be in the process of doing so. It is much more accurate however, to state that, speaking at least for the collective work of PNAMP, identified a sequence of effectiveness activities.

**Monitoring and Action Effectiveness Research** – The draft confuses the misuses of the term “effectiveness research” with what PNAMP documents usually refer to as “effectiveness monitoring” (see pages 26, 29, 51, and others). Under limited circumstances PNAMP applies the effectiveness research term to “validation monitoring,” but only in the larger context of “Effectiveness Monitoring.” PNAMP has generally not relegated effectiveness monitoring to the level of research. We suggest use of the terminology effectiveness “monitoring” not effectiveness research.

Pg 29-31: **Action Effectiveness Research, Habitat Project Effectiveness, Intensively Monitored Watersheds** – Although there is much useful information in these three subsections, they could be better differentiated and organized, and terms could be more consistently applied to improve clarity and reduce redundancies. For example, the first and second sections mix terms like “action” and “project”

without clearly defining them; PNAMP generally places both under “action effectiveness monitoring.”

See previous comment recommending use of the term “effectiveness monitoring” as opposed to “effectiveness research.”

In the draft, the evaluation of project categories is mixed with evaluations of fish response at the watershed scale (IMW), and in the IMW section, further discussion of habitat project effectiveness is found. As noted above, the generalized action evaluation categories are separate (e.g., programmatic site or reach-scale evaluations of habitat restoration project effectiveness).

A suggested improvement to achieve greater consistency with PNAMP is to organize this information under a broad Action Effectiveness *Monitoring* section, within which a Habitat Project Effectiveness subsection would include clearly separate section on site or reach scale habitat project evaluations, and watershed-scale habitat project evaluations (IMW). In that case, the second paragraph under the Intensively Monitored Watersheds section, could be moved up under the new site or reach-scale subheading.

Pg 33: **Project Implementation/Compliance Monitoring** – This type of monitoring is essential to a comprehensive monitoring system but has received relatively little attention by PNAMP and others to date. We suggest this be better defined and applied much earlier in the draft Guidance (e.g., it appears on page 16) so that the need and how it is distinguished from effectiveness monitoring it is clear.

We hope you find these comments constructive and of value. We appreciate the tremendous amount of work signaled by this effort, and are encouraged that some of what PNAMP has been able to produce to date have had some utility in helping you forge your “Paradigm Shift Ahead.”

Thank you for the opportunity to comment. We look forward to continued support and participation by the Council in PNAMP activities.

Sincerely,

Jen Bayer  
PNAMP Coordinator

cc: PNAMP Steering Committee  
Steve Waste