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**CBFWA****IDAHO DEPARTMENT OF FISH AND GAME**600 South Walnut/P.O. Box 25  
Boise, Idaho 83707Dirk Kempthorne / Governor  
Steven M. Huffaker / Director

January 10, 2006

Stephen J. (Steve) Wright  
Administrator  
Bonneville Power Administration  
905 N.E. 11th Avenue  
Portland, OR 97232

Dear Mr. Wright:

I know BPA is in the reviewing and selection of one of five proposals for the transitional continuation of the Fish Passage Center functions. IDFG recently presented testimony to the NWPCC at their December 7 meeting that address needs we have as Idaho's fisheries management agency. I would like to ask that these points be considered in your review and selection among the proposals.

IDFG uses the functions currently performed by the Fish Passage Center (FPC) as an integral part of our management program. The access to technical staff to assist us with analytical needs and scientific support through coordinated and consistent historical and in season data provides IDFG the ability to "extend" our staff resources much further, financially and effectively, to achieve our management responsibilities. I expect to require and need no less in the future from whoever provides this service. I wish to emphasize now that although we work closely together on many technical analyses, at the end of the day, any management recommendations are those of IDFG and that will not change.

BPA's RFP addresses three functions: 1) data warehousing; 2) coordinating the Smolt Monitoring Program (SMP), and 3) analysis and reporting. These three functions are critical to our management and must be highly integrated to be effective, thus any transition should remain integrated. Maintenance of data standards, data quality, and data consistency is crucial, as is understanding of the data and its context within the management regime to apply appropriate analytical techniques. Current functions should remain integrated and not divided among multiple entities to provide both a seamless transition and ensure timeliness, consistency, and accuracy. The region is currently plagued with our collective inability to link data and observations because our data is often not "apples to apples", a topic that BPA and others has often broached. Let's not further exacerbate the situation by parceling out these key functions to multiple entities. We are all trying to increase our efficiencies.

Several key functions that we ask to be addressed in considering the proposal for the interim that are important to our management program:

First technical support to the Fish Passage Advisory Committee needs to continue to include:

- 1) weekly information tailored for the state, tribal, and federal fishery managers for in season migration assessment and to support management recommendations,

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- 2) technical responses to specific data requests and assistance with developing System Operation Requests (SORs),
- 3) website documentation of the SORs and resulting management response, and
- 4) general administrative support such as technical editing and communication facilitation to produce cohesive documents.

Second the transition plans for the coordination and support function of the FPC for the Comparative Survival Study (CSS) and the CSS Oversight Committee needs continued. The FPC-coordinated projects that are gathering on-the-ground data for SMP and CSS will be affected by the transition. IDFG directly implements CSS and SMP data collection, but the FPC currently plays a very important role in ensuring appropriate and coordinated sample sizes and data standards across a broad geographic range, and ensures technically coordinated project proposals for contracting. These projects are important because they reflect the collaborative efforts of state and tribal fish managers to address key management questions to meet their needs to assess hydro system management effects to fish, and assess related fish protection efforts. Third we recommend a continued adherence to the policy of public disclosure of data and analyses that the Council has fully supported as an operating criterion of the FPC. We also believe that budgetary support for the new "system" should be fully disclosed.

The Region is currently engaged in collaborative discussion regarding framing a Biological Opinion for the FCRPS. The necessary technical foundation and understanding relies on information from many sources, including information from the FPC by choice of the participants, not by choice of the FPC. I ask BPA to select a proposal that does not allow a dysfunctional transition of these important data and analytical functions that could compromise effective collaboration and progress toward recovery of listed stocks.

IDFG also recommends that fishery managers have a role in assessment of responses to the RFP, or any other transition plan to ensure functions and services will be maintained appropriately. State, tribal and federal fishery managers have similar and differing responsibilities, but they must be accommodated. There should be a direct role for fishery managers in oversight and implementation of any new entity to ensure this happens.

In summary, let me repeat my previous recommendation – current responsibilities and functions of the FPC should remain highly integrated. I am unable to envision meeting this criterion if functions are scattered among multiple entities. I ask that during this first transitional year that BPA give consideration to maintaining the integrated programs to allow all of us to have the data we need during 2006.

Sincerely,



Virgil Moore  
Chief, Fisheries

Cc: BPA Greg Delwich, BPA Bob Austin, CBFWA Brian Lipscomb, ODFW Ed Bowles, WDFW Jeff Koenings, MDFWP Larry Peterman