

July 10, 2006

Dr. Tom Karier  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, OR 97204

Dear Chairman Karier:

The Columbia Basin Fish and Wildlife Authority (CBFWA) recently reviewed the Independent Scientific Review Panel's (ISRP) "*Preliminary Review of FY 2007-09 Proposals for the Columbia River Basin Fish and Wildlife Program*" and is providing the following comments for consideration by the Northwest Power and Conservation Council (NPCC). The CBFWA's review involved two steps: (1) review the "*Programmatic Comments*" (ISRP 2006-4A), and (2) review the "*Recommendation and Comments on each Proposal*" (ISRP 2006-4B). Upon reviewing the ISRP's comments, the CBFWA is in agreement with some of the ISRP's recommendations; however, the CBFWA is concerned other recommendations have programmatic implications.

Generally, the ISRP was successful in evaluating the technical merits of proposals; however, the CBFWA believes the ISRP does not comprehend many of the programmatic issues associated with the Fish and Wildlife Program as well as policy-oriented implications associated with the funding of proposals. The CBFWA identified the following issues that deserved further discussions among the CBFWA, NPCC, and BPA: (1) the ISRP's decision to evaluate legitimacy of projects as mitigation actions, (2) the fund-oriented designations that the ISRP assigns to proposals, (3) the ISRP's unfamiliarity to existing plans and agreements which dictate specific roles and responsibilities, (4) the ISRP's call for biological data reporting, (5) the ISRP's criticism of HEP, and (6) the ISRP's comments on future project review processes.

The 1996 amendment to the Northwest Power Act (ACT), directs the ISRP to review projects for consistency with the NPCC's Fish and Wildlife Program and whether they: (1) are based on sound science, (2) benefit fish and wildlife, (3) have clearly defined objectives and outcomes, and (4) have provisions for monitoring and evaluation of results. The CBFWA questions the appropriateness of the ISRP to determine if proposals represent a qualifying mitigation strategy. For example, the ISRP (ISRP 2006-4A) suggested that "By definition *mitigation* is the moderation of a quality .....Our conclusion on the projects in question...is an inadequate mitigation strategy to compensate for the Federal Columbia River Power System (FCRPS) effects on sockeye salmon survival." Although this statement was in the context of the Redfish Lake sockeye salmon discussion, the mitigation question was also applied to a Hungry Horse mitigation project. The CBFWA believes that these are policy-oriented issues and decisions that should be reserved for the fish and wildlife managers, NPCC, and Bonneville Power Administration.

The CBFWA Members believe the ISRP's practice of assigning projects fund-oriented "labels" is inappropriate. Because the ISRP is tasked with evaluating the technical merits of a proposal, their recommendations should be more consistent with their charge. The CBFWA believes the more appropriate labels for the proposals, based on the ISRP review, are technically sound, technically acceptable, and not technically acceptable. In fact, in 2001 the CBFWA modified its review process for this explicit reason, changing recommendation designations to reflect management priority rather than fund/do not fund.

In general, the ISRP's review of RM&E projects included numerous comments and criticisms that showed an understandable lack of programmatic context on their part. The reviewers called into question numerous field activities and evaluation efforts that were prescribed within Hatchery Master Plans, Biological Opinions, US vs. Oregon, and the Lower Snake Comp Plan, and that are central to the evaluation of these efforts at various hierarchies. In addition the reviews, which were intentionally "technical" in nature, do not consider the numerous MOUs, MOAs, and Cooperative Agreements that dictate RM&E roles and responsibilities for the Columbia River Basin agencies, authorities, and funding entities. These plans and agreements are in place to ensure that long-term evaluation programs withstand short-term political, fiscal, or administrative dynamics. They do not preclude or exclude technical review, improved coordination, and progressive collaboration in the adaptive management process; however, they do create a context for a programmatic approach to evaluation which was mostly absent from the ISRP's review. The fish and wildlife managers have a working understanding of the commitments and policies in place within each of the subbasins and at the basinwide scale. The CBFWA recommends that an explicit management review process by the fish and wildlife managers be established in the next funding cycle to determine the management priority of proposals and their tie to existing long term agreements and programs. An example of this disconnect are the ISRP comments throughout their report on lack of project-specific monitoring and evaluation at the same time BPA is calling for a significant reduction in these activities.

The CBFWA agrees with the ISRP's (2006-4A) suggestion that there "is the need for readily accessible data on numbers of adults returning to the subbasin (i.e., escapement estimates)" and their recommendation "that Council and BPA (Bonneville Power Administration) ensure that data generated by public funds is readily available through publicly accessible websites." The ISRP (2000-3) questioned "whether any existing organization has broad enough authority to take command of basinwide implementation." Because of the structure of the CBFWA (state, tribal and federal fish and wildlife entities), it may be the only entity in the Columbia River Basin that has the capability to coordinate and implement a comprehensive (i.e., resident fish, anadromous fish, and wildlife data from tribes, states, and federal entities) basinwide data inventory. In 2005, the CBFWA began development of the Status of the Resource Project, a coordinated data inventory project that utilizes a uniform basinwide design to track the status of fish and wildlife populations throughout the Columbia River Basin. The Status of the Resource Project, combined with CBFWA's historic project data base, will facilitate much of what the ISRP is calling for in tying projects to biological outcomes. The CBFWA agrees with the ISRP that projects supported by BPA funding should make their data available electronically; however, it is important that the data be used in a manner consistent with its collection parameters. Results from the CSMEP project and the realignment of the StreamNet project should facilitate guidance to BPA funded projects on how, and where, to provide data to meet this objective.

The HEP has been used within the Fish and Wildlife Program to answer the question of how much it will cost in units of habitat to mitigate for the construction and operation of the FCRPS. The HEP was not designed as a robust monitoring and evaluation tool although some managers have used it as such lacking any other project monitoring protocols. The CBFWA agrees that HEP is not the best monitoring and evaluation tool and that more robust habitat monitoring and evaluation protocols are available to managers; however, the ISRP is incorrect in suggesting that HEP or CHAP were developed as monitoring and evaluation tools and/or are being used as such. Simply stated, HEP is a crediting instrument. The HEP model's variable outputs, however, can be used as a "course filter" to identify habitat deficiencies that may limit target species populations and/or to trigger habitat management actions or further investigations. As the Region moves closer to fulfilling BPA's terrestrial habitat obligation ("HU ledger"), it is increasingly important to ensure that HEP evaluations (again for crediting purposes) are conducted in a timely, consistent manner across the entire Columbia Basin Region. The Regional HEP Team (RHT), with assistance from project managers, is the least biased most effective approach to accomplishing this task.

The CBFWA agrees with the ISRP in that site visits and presentations should be components of the next solicitation, a process similar to that implemented during the 2001-2004 Rolling Provincial Review (RPR). For almost 15 years, scientific review groups (i.e., Scientific Review Group, Independent Scientific Group, Independent Scientific Advisory Board, and ISRP) proposed the use of site visits and presentations to better understand the projects funded through the Fish and Wildlife Program, a process that was implemented during the RPR. During the current solicitation, the CBFWA Members observed many issues (e.g., inconsistency among reviews, erroneous assumptions and speculation, misunderstanding of the existing coordination among managers and projects, and lack of knowledge about the qualifications and capabilities of project sponsors to perform proposed work) that might not have occurred if the ISRP had been provided an opportunity to tour the Columbia River Basin and meet with project sponsors.

The CBFWA believes future site visits and presentations should follow the process developed during the first RPR. The ISRP (2005-14) indicated that the meetings were organized "in an effective and efficient manner balancing the needs of the review teams with the requests and demands of the project sponsors." The ISRP (2005-14) suggested that the project sponsors and ISRPs "relationship was no longer anonymous and the ISRP depended on CBFWA staff to be responsive to ISRP needs and run the review process." The CBFWA believes its staff is the most qualified to coordinate and facilitate these events and that they should be tasked with providing these services in the future.

The ISRP recommended that topical and targeted reviews should be implemented for programs or subject areas to ensure consistency in application across the Columbia River Basin. The CBFWA believes that the current Fish and Wildlife Program is not necessarily structured in a way that would allow for systematic topical reviews in coordination with funding recommendations; however, the CBFWA has facilitated many of these types of reviews in the past, out of sync with funding reviews, and could facilitate topical and targeted reviews *in addition to* a rolling province review process in the future. The CBFWA has been used in the past as a forum for resolving issues ranging from conservation enforcement to summer spill. Coordination and facilitation of topical and targeted reviews is a useful and appropriate role for CBFWA to serve for the Program. The CBFWA staff has worked well with the ISRP and could easily accommodate their participation in these reviews.

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The CBFWA submits these programmatic comments to the NPCC to help bring context to the ISRP review and raise some programmatic issues that we would like to discuss further with you. The fish and wildlife managers support the use of the ISRP for technical review of proposals, prior to the management prioritization, but caution the NPCC in accepting those reviews in their entirety. The Members of CBFWA will continue to work with NPCC and their staff to develop the best funding package for the FY 2007-2009 period.

If you have questions regarding these comments, please contact Brian Lipscomb at (503) 229-0191.

Sincerely,

Ron Trahan, Chair  
Columbia Basin Fish & Wildlife Authority

Cc: CBFWA Members  
NPCC Members

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