June 26, 2008

Mr. Mark Walker Director of Public Affairs Northwest Power and Conservation Council 851 SW Sixth Avenue, Suite 1100 Portland OR 97204-1348

Dear Mr. Walker:

Thank you for the opportunity to comment on the Northwest Power and Conservation Council's (Council) draft set of high level indicators that were released for public comment during the June 11 Council meeting in Spokane. The agencies and tribes of the Columbia Basin Fish and Wildlife Authority (CBFWA) support the development of high level indicators to help measure the success of the Fish and Wildlife Program (Program). High level indicators are useful to summarize Program accomplishment at a broad scale and provide an overarching direction for research, monitoring and evaluation. However, the high level indicators alone may not adequately report progress towards meeting the Program's biological objectives and inform adaptive management. The Members of CBFWA have reviewed the draft indicators and believe they provide a good first iteration. We offer Attachment 1 as an alternative way to organize the indicators and articulate the units for reporting at different biological and geographic scales. The indicators in Attachment 1 are presented within a format similar to that provided in the Washington Governor's Salmon Recovery Board amendment recommendations with an emphasis on the biological and performance indicators. Attachment 1 builds upon and provides more specificity to the Council's draft high level indicators showing the important linkages between monitoring and reporting at different scales.

High level indicators for the Program need to meet the following criteria:

- The indicators should report program accomplishment towards the objectives of an amended Program as recommended by the fish and wildlife managers.
- The indicators need to be supported by the data management and monitoring framework described in the fish and wildlife managers' amendment recommendations.
- The information used to create the high level indicators will need to be supported not only by monitoring programs funded by the Program but also monitoring programs funded by the fish and wildlife managers and other resource managers.
- The high level indicators must be consistent with other reporting needs at various scales both within and external to the Program, such as but not limited to, NOAA's Endangered Species Act reports and the Washington *State of the Salmon in Watersheds* report.
- The indicators need to be built upon monitoring and reporting needs at different population or geographic scales.
- Consistent with the CBFWA amendment recommendations, the Status of the Resource report should be used to report monitoring results at the different biological and geographic scales.

The first page of Attachment 1 includes a Monitoring and Reporting Pyramid. Monitoring and reporting at the population and ESU/MPG/DPS scales provide the foundation for higher, Basin-level reports. Much of the information needed for high level reports is funded, collected and reported to the meet management and reporting needs of the fish and wildlife managers external to the fish and wildlife program. Therefore, the monitoring and reporting needs of all three levels must be considered concurrently.

The remainder of Attachment 1 utilizes the concept of the Monitoring and Reporting Pyramid to display the reporting units at different biological or geographic scales necessary to develop a high level report, consistent with the CBFWA amendment recommendations. Development of the high level indicators will need to be an iterative process. The Council will need to work with the federal, state and tribal fish and wildlife managers, as well as other resource managers, to ensure the reporting units are clearly defined and the necessary monitoring programs are in place.

The Status of the Resource Report (SOTR) and website is the logical vehicle to report monitoring results at the appropriate scale so the information is readily available to the Council and region to meet multiple reporting needs. To that end we are developing a draft version of the 2008 SOTR using the information in Attachment 1. We are also working with the federal land managers to incorporate their habitat information into the SOTR. We intend to begin similar discussions with the water quality managers. Displaying the information in one place will aid the region in determining what monitoring is occurring where, identify any information gaps and facilitate the discussion on how to fill those gaps. The CBFWA amendment recommendations, including the biological objectives, data management, monitoring, and wildlife recommendations for a crediting forum, will greatly facilitate the Council's desire to report on the progress of the Fish and Wildlife Program. The CBFWA Members are committed to work with the Council to further develop the high level indicators that support the amended Fish and Wildlife Program. If you have any questions or desire further information please do not hesitate to contact Brian Lipscomb or Ken MacDonald at the CBFWA office.

Sincerely,

Larry Peterman, Chairman Columbia Basin Fish and Wildlife Authority

Enclosure: 1

1) Attachment 1

Cc: NPCC Members and Staff CBFWA Members