

Project Number: 23082

Project Title: Protect fish habitat through education and enforcement.

Sponsor: CRITFC

ISRP Comment or Issue #1

This proposal does not address imminent risks to ESA stocks by offering direct on-the-ground benefits with one-time funding.

The proposal is designed to specifically address ESA stocks through immediate improvements to habitat by stopping illegal water diversions, illegal spawning ground destruction from unpermitted construction, and other illicit activities. Halting unlawful activities will have immediate effects. Page 6 of our proposal identifies the listed species in seven subbasins that will be directly protected by this proposal including steelhead, fall chinook, summer chinook, and sockeye. Three of the seven subbasins identified in the CRITFC proposal are the same three subbasins identified in the 2000 FCRPS Biological Opinion as requiring the highest priority (Methow, John Day and Salmon subbasins).

Our project will have immediate on-the-ground benefits to critical habitat needs of endangered species. To give an example, if a person drives an All Terrain Vehicle through the middle of endangered salmon redds, and an enforcement officer stops them as a result of this program, this would provide an immediate benefit for survival rates to an endangered salmon. Another example would be a construction site in violation of regulations that would cause sedimentation of spawning gravels, which if forced to comply with the law would provide immediate benefits to the habitat. Enforcement of habitat protection measures directly results in enforcement of reduced take of ESA listed species.

ISRP Comment or Issue #2

It is for infrastructure to support coordination, education, and enforcement that to be successful will need to be ongoing.

On November 13, 2000, NWPPC and BPA issued a letter requesting proposals for “High Priority” project proposals for BPA funding and included criteria for project selection. One of the criteria stated,

“The proposed project would address a habitat enforcement issue and result in the protection of listed, anadromous fish habitat including marine habitat.”

This type of project proposal (habitat enforcement) was specifically requested in the NWPPC and BPA criteria for a high-priority project. Therefore, this proposal meets the criteria set out by the NWPPC and BPA.

Furthermore, the benefits of education will last for several years, even if the project ends after one year. This proposal largely focuses on training volunteers and enforcement agents. Once they are trained to understand how to spot ESA violations, they will retain this knowledge, and this will provide for continuing and residual improved habitat management that protect ESA-listed species.

CBFWA Comment #1

Enforcement portion of this proposal meets the high priority criteria. The education portion of the proposal is not urgent but would provide benefits to the region. Project should only be funded if well coordinated with Oregon State Patrol (OSP) to avoid duplication of effort.

On February 13, 2001, the objection from ODFW was eliminated. A consensus within CBFWA has been reached regarding this project. The implementation of this project is intended to compliment, not complicate, the Oregon Plan. In Oregon, all components of this proposal are directed towards tribal members and tribal lands only. This includes the education component.

Objective 4 of the Oregon Department of Fish and Wildlife's project proposal (#23079) is complimented and enhanced by Oregon State Patrol's capacity for enforcement activities. However, it is understood that support for Objective 4 of project #23079 does not imply that the CRITFC tribes support the entire Oregon Plan.

From: "Jill Ory" <oryj@critfc.org>
To: GWCB.GWPDJ(Trina)
Date: 2/14/01 9:19AM
Subject: Comments to NPPC

Trina,
attached are our comments to the Northwest Power Planning Council.
Thanks,
Jill

Jill Ory
Watershed Hydrologist
Columbia River Inter-Tribal Fish Commission
729 NE Oregon, Ste. 200
Portland, OR 97232
(503) 731-1309
oryj@critfc.org
www.critfc.org

CC: GWCB.GWIA("LUMP@critfc.org")