



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

May 12, 2010

In reply refer to: KEW-4

Nancy Leonard  
Northwest Power & Conservation Council  
851 SW 6th Avenue, Suite 1100  
Portland, Oregon 97204-1348

Dear Ms. Leonard:

Thank you for the opportunity to comment on the draft Monitoring, Evaluation, Research, and Reporting (MERR) Plan. The MERR has the potential to provide significant value in advancing both effective and efficient planning and implementation of RM&E under the Fish and Wildlife Program. And the plan further advances the RM&E framework and strategies that came out of the RM&E workshops at Skamania this past autumn. The regional collaboration over the past couple of years to develop a comprehensive RM&E framework has gained considerable traction, and the Northwest Power and Conservation Council's (Council) effort to facilitate this under the Program is helpful and appreciated.

### **Fish and Wildlife Program Spending on RM&E Activities:**

BPA believes that a critical implementation step for RM&E should be to move away from a project-by-project implementation paradigm to a "top down" approach driven by an explicit budget. Then, within the MERR framework, RM&E activities would be based on the relative priorities of individual projects within the available budget. This is critical because over time, incremental project funding recommendations have collectively resulted in nearly 40 percent of program spending being currently dedicated to RM&E activities. If our overarching objective is to protect, mitigate and enhance fish and wildlife populations adversely affected by the Columbia River hydrosystem, then every dollar spent studying, monitoring and evaluating these populations is one less dollar available for protection, mitigation and enhancement. This is not to say that mitigation efforts should not be grounded in good science - of course they should be - and the science review provisions of the Power Act compel good science. Fortunately, the MERR, through both its overarching framework and its risk matrix, provides an excellent filter for prioritizing RM&E actions within a defined budget. And most importantly, through a more disciplined alignment between the MERR framework and RM&E actions/projects, opportunities for both improved effectiveness and efficiencies should become apparent, thereby providing the potential for further on-the-ground mitigation actions to be implemented within the overall Program budget. Such prioritization efforts would also have the value of stimulating regional engagement on the appropriate balance between the value of more information and the value of additional actions providing on-the-ground benefits to fish and wildlife. The risk matrix

approach in MERR that assesses effort-consequence (or cost-risk) is a sound basis for policy decisions associated with such balance.

### **Linkage between the MERR and Biological Opinion/Accords/Recovery Plans**

The MERR report appropriately identifies the importance of integration with the assessment needs and guidance of regional biological opinions and recovery plans. We suggest, however, that the MERR more explicitly articulate its linkage with the extensive RM&E framework, strategies and actions being implemented under the Federal Columbia River Power System (FCRPS) Biological Opinion (BiOp), Fish Accords and regional Recovery Plans, all of which need to be effectively integrated and aligned within the Fish and Wildlife Program. The plan should explicitly identify that a primary input for anadromous fish monitoring and research priorities, approaches, and guidelines will necessarily come via the planning and implementation of the BiOp RPAs and associated recommendations of the Action Agency / NOAA Fisheries / NPCC BiOp (ANNB) RM&E Workgroups. Fish and Wildlife Program stakeholders, as well as other affected interests, will all benefit from alignment between management questions, biological objectives, performance standards, critical uncertainties, prioritization criteria, metrics, monitoring approaches, terminology, and data management guidelines identified in the MERR, and the RM&E strategies and commitments of the FCRPS BiOp and Regional Recovery Plans. We believe that work that is currently underway in the ANNB Workgroups will help align and integrate F&W Program and FCRPS BiOp RM&E activities, all in the context of the MERR. We encourage the Council's continued participation in this process.

We are encouraged by the close alignment between the MERR framework and the three different types of monitoring reflected in the FCRPS BiOp (i.e., status and trend monitoring, action effectiveness monitoring, and implementation monitoring), the different levels of effort they entail, and different programmatic coverage that may be needed for each. In particular we agree with the distinction that not all projects require action effectiveness monitoring, but only project implementation and compliance monitoring at a minimum. We note, however, that the MERR seems to mix local, project-level action effectiveness along with project implementation and compliance monitoring, and do not believe that all projects need local, project level effectiveness monitoring (particularly for certain types of habitat projects). We are hopeful that this misalignment is more of a difference in terminology than it is conceptual. As a next step, we suggest that that additional alignment occur not only on monitoring definitions, but more importantly, the level of monitoring coverage needed for different types of monitoring – this could be pursued through the ANNB RM&E Workgroups and the PNAMP Action Effectiveness Workgroup.

BPA also supports the MERR recommendations for action effectiveness priority on population response, on standard monitoring protocols, and on preponderance of evidence approaches. The approach to action effectiveness is well thought out and provides significant improvements in programmatic direction and guidance to the ISRP.

Finally, BPA continues to support the application of HLIs and the guidance they provide to RM&E priorities, but also believes these could be better aligned with the HLIs and associated metrics of the BiOp and other regional entities. This alignment should continue to be pursued through the ANNB RM&E workgroups and PNAMP partner agencies.

**Other Programmatic Issues:**

BPA supports the proponent exchange and science–policy exchange with the ISRP and ISAB. We agree that these exchanges of science and project information will help keep the Council, BPA, and regional interests better informed on the status, issues and progress of the Program, and will support appropriate modifications to RM&E as well as adaptive management of mitigation actions under the Program to improve their effectiveness.

We also agree that a periodic synopsis of RM&E could be a valuable product for management of the Program. Given staff constraints and the resources this could require, this proposal would benefit from further vetting and scoping, including alignment and integration with FCRPS BiOp Comprehensive Reporting requirements on a 3-year cycle aligned with required BiOp Implementation and Adaptive Management Plan updates.

BPA strongly supports the data management and sharing requirements identified in the MERR and has been working in several forums to advance these key elements of information management. We will need continued support from the Council as these requirements are implemented within contracts and F&W Program management procedures over the next year.

We also support the MERR’s Standardized Approach for Implementation Strategies. The framework for the strategies is similar to that provided under the FCRPS BiOp and recommendations BPA has provided in the past on RM&E Framework, but is not completely consistent. Again we recommend that FCRPS BiOp/MERR alignment be further refined through collaborative efforts within the ANNB Workgroup. In addition, this section of the MERR would benefit from explicit reference to the guidance of the FCRPS BiOp, the associated ANNB RM&E Recommendations Report and the NOAA Fisheries Monitoring Guidelines Document.

**Conclusion**

In conclusion, we believe 1) the MERR has the potential to provide significant value in advancing both effective and efficient planning and implementation of RM&E under the Fish and Wildlife Program, 2) the MERR further advances the RM&E framework and strategies that came out of the RM&E workshops at Skamania this past autumn, 3) a bit more detail and development of next steps is needed for further enhancing the alignment between the MERR and FCRPS BiOp/Accord/Recovery Plan RM&E activities/frameworks/priorities, but 4) an overall budget is needed within which RM&E is prioritized within the MERR framework and its risk matrix.

We look forward to our continued work with the Council in next steps on both refining the MERR and implementing it.

Sincerely,



William C. Maslen  
Director, Fish and Wildlife