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## WASHINGTON COLUMBIA BASIN REGIONAL SALMON RECOVERY BOARDS

May 10, 2010

Dr. Nancy Leonard  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, Oregon 97204-1348

Dr. Leonard,

We transmit these comments on the Northwest Power and Conservation Council's Draft Monitoring, Evaluation, Research, and Reporting (MERR) Plan on behalf of Washington's regional salmon recovery organizations in the Columbia Basin: the Lower Columbia Fish Recovery Board, the Yakima Basin Fish and Wildlife Recovery Board, the Upper Columbia Salmon Recovery Board, and the Snake River Salmon Recovery Board.

We commend the Council for undertaking the challenging and timely task of developing strategic policy guidance and priorities for its RME program. An effective RME program coordinated across the Council's many partners in the Columbia Basin is needed to answer critical management questions, to ensure the prudent and efficient use of resources, and to assess progress in achieving goals of the Fish and Wildlife program.

While our detailed comments on specific elements of the MERR are attached, a few of the more substantive areas that we believe need further work, perhaps through some collaborative group process, are highlighted below. Addressing these issues will greatly enhance the utility and value of MERR in guiding Council decisions.

First and most important, it is difficult to see how the current draft of MERR will assist the Council in making decisions. We understand that the Council intends to use MERR to guide ongoing management of RME projects and provide the ISRP with a policy framework and technical criteria for use in the upcoming categorical review of RME projects. However, we find it very difficult to follow how the many new and existing policies and procedures identified in MERR would be applied in the existing decision-making environment. We suggest that a decision tree be developed that clearly and logically depicts the Council's role and process in making decisions, and identifies the policies and procedures that will be considered. At each step, we would like to see a box that identifies what information the Council needs to make a decision and what policies and criteria would be applied during that decision. It would also be valuable to identify the resources that will be required to complete each substantive step identified in MERR in a timely manner. Currently, it is

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unclear how the number and complexity of the new tasks identified in MERR will be accomplished given limited resources.

Next, while we support the goal of developing a prioritization framework, it is unclear how this document accomplishes this. The criteria established in MERR generally seem more like eligibility criteria than criteria for assessing how to prioritize eligible projects. Setting priorities can be inherently difficult and divisive process, so it is vital that the prioritization process be inclusive, transparent and thorough. It needs to be clearly tied to the Council's mission, goals, objectives, actions and priorities. This is a time-consuming complex process and will be hard to fully complete within the schedule the Council has set for adopting MERR at the June meeting. We think that the decision tree we suggested earlier could identify which criteria are applied at each step, and evaluate where work remains to be done to allow effective application of the prioritization framework at that step; in this way, those parts of MERR that are ready may be adopted in June, and others may be adopted in subsequent meetings. Since prioritizing RME actions also depends on the priority given other actions (as the priority of evaluating effectiveness of a set of actions depends on what priority is given to completing those actions), we suggest that the Council consider developing a collaborative and inclusive process to define strategic priorities for all Program activities during the full Fish and Wildlife Program Amendment process. This will ensure we have good representation and review during development, as well as allow us to develop much-needed policies and priorities in a shorter time frame than the 5-year cycle for the first MERR plan amendments.

As regional boards that work with both Council and State of Washington programs, we would like to see a convergence of the direction set through MERR and that provided to us through the Salmon Recovery Funding Board (SRFB) and the Washington Forum on Monitoring Salmon and Watershed Health (FORUM). There are a few significant differences, including definitions of different types of monitoring and of Intensively Monitored Watersheds (IMWs), which are particularly troubling. We think it will greatly benefits all involved if the definitions are consistent.

Lastly, we ask that you give more consideration to what the Council expects from each report that is outlined in MERR. The focus needs to be on users of the reports and the decisions they need to make or the questions they need to answer. Multiple reports with multiple data demands – whether those are from or by Council's central staff, the Columbia Basin Fish and Wildlife Authority, or local salmon recovery organizations – require many hours of work to generate, and have the potential, if not carefully developed, to be of limited utility or to portray misleading or confusing information. Data communication differs significantly from data evaluation, and a report for governors and the public does not take on the volume or detail needed as does one for scientists. We request that you carefully consider who each report is for, what you want each to communicate, and the level of resources that will be needed to complete each of them in a rigorous and transparent manner. A few reports done well may be more valuable than a plethora of late or partial attempts.

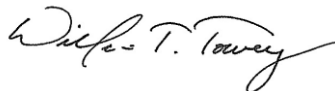
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We have included more detailed comments in the attachment. Again, we appreciate the tremendous work that went into getting this draft out, and we look forward to working with the Council as you refine the MERR.

Sincerely,



Del Groat, Chairman  
Snake River Salmon Recovery Board  
Asotin County Citizen Member



Bill Towey, Chairman  
Upper Columbia Salmon Recovery Board  
Colville Confederated Tribes Representative



Tom Linde, Chairman  
Lower Columbia Fish Recovery Board  
Skamania County Citizen Designee



The Honorable Nancy Lillquist, Chairman  
Yakima Basin Fish and Wildlife Recovery Board  
City of Ellenburg Representative

Cc: Dr. Tom Karier, Northwest Power and Conservation Council  
Richard Wallace, Northwest Power and Conservation Council  
Bill Wilkerson, Chairman, WA Forum on Monitoring Salmon Recovery and Watershed Health

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Executive Summary

Page 2. You might consider adding a summary of Council's monitoring priorities. The three implementation strategies should also be identified.

Section 1) Background

Page 4. This section appears to use the term "action" differently and, perhaps, in conflict with the definition presented in footnote 2. It also highlights the need for a definitions section at the beginning of the document. We found several places – most notably in types of monitoring – where suggested definitions vary from those used in Washington. We think consistency across organizations and states is crucial to a successful strategy and plan, so we hope the Council will consider adopting definitions recommended by PNAMP, or perhaps making clear why the usage in MERR is different.

Page 6: Figure 1. This is a complex and confusing figure, and text explaining the figure is quite long; if this much explanation is needed to understand the figure, perhaps a better approach would be to move the explanation into the body of the text?

Section 2) Strategic Plan

2.3) Policy Guidance

Page 8. It is good that key policy bullets are highlighted up front, but it is difficult to understand how they logically relate to one another or to follow them through subsequent sections. Moreover, we find it very difficult to follow how the many new and existing policies and procedures identified in MERR would be applied to the existing decision-making environment.

We suggest that a decision tree be developed that clearly and logically depicts the Council's role and process in making decisions, identifies the applicable policies to be considered, and lays out the procedures and steps that will be followed. Specifically, for each step, we would like to see a box that identifies what information the Council needs to make a decision and what policies and criteria would be applied during that decision. It would also be valuable to identify the resources that will be required to complete each substantive step identified in MERR in a timely manner.

The use of a risk-effort analysis approach appears to be a new and significant initiative. It seems something as important as the effort-risk analysis would be more appropriately discussed in the body of the plan text, rather than in a footnote, and an example or two of how this might work added. Likewise, while we support the concepts of a preponderance of evidence standard, it seems this is also an initiative that deserves more prominence in the text as well as a discussion of when and how it might be applied.

We understand that common protocols are essential to data sharing and interpretation, but are also perplexed by the policy which would require ". . .all research and monitoring conducted must. . .use protocols approved by the Council" (emphasis added). Is it possible that there are circumstances where it would be desirable to encourage the use and/or development of new and diverse protocols during the course of a project? We accept the idea that use of common protocols is appropriate for some wide-spread measures, but perhaps there could be a qualifier for the times when this does not work.

We agree that RME data need to be accessible in a timely manner. We question if the creation of a separate timeline for reporting (last policy) outside that which exists for BPA annual reporting is necessary.

### Section 3 ) Implementation Framework

#### 3.2) Structure

Page 11. This diagram is easy to follow and might benefit a reader if it were placed earlier in the report since it applies to all of MERR, not just the implementation framework. And, as with Figure 1, we recommend the cumbersome figure description be shortened; this much text deserves to be in the main body of the text. Perhaps you might also consider pulling each of the boxes out and repeating them in their appropriate location in the document.

#### 3.3.1) Management Questions

Page 12. Although the footnote sends readers to Appendix 3 and the Council’s website for the list of management questions, they are on the next page. It is interesting to note that an important priority is embedded in the statement: “All RME actions, therefore, must contribute data towards answering one or more of these questions.” This is an example of where the decision tree we suggest be developed could help identify policy applications.

#### 3.3.2) Biological Objectives

Page 12. The plan states that the Program’s biological objectives should aid in prioritizing RME and reporting actions, but does not explain how they would be used for such a purpose. It also notes that biological objectives need to be “developed further,” but does not explain what needs to be done or the schedule or process for doing so.

#### 3.3.3 Performance Standards

Page 15. You might want to note that Appendix 2 provides a list of the Council’s performance standards.

The plan notes that the Council will assess the need for additional standards in conjunction with its efforts to further develop biological objectives, but does not explain how this will be accomplished.

The sentence, “If progress towards achieving these performance standards falls significantly short then the Council may revisit all or part of the Program to determine what needs to be changed to make progress” appears to be a significant policy statement; we suggest you move it up front where it will be more visible.

#### 3.3.4) Prioritization Criteria

Page 16. This section could benefit from some clarification. We struggle with a prioritization scheme that tiers criteria, but says they are all important; that doesn’t eliminate or “lower-rank” projects through any sorting mechanism; and that places coordination in the third tier (seemingly less important?) of a strategy that argues one of its main functions is to improve coordination. Another confusion is the sentence, “The Council has adopted broad criteria, subdivided into four tiers, to provide guidance for implementation of Program RME actions.” This implies the criteria are only germane to the Implementation Framework, but shouldn’t they also be applicable to Implementation Strategies, project-by-project decisions related to RME data collection, reviews by the ISRP, and decisions by the Council?

Page 17. The plan states that “Implementation strategies developed for resident fish, anadromous fish, and wildlife will at a minimum focus on listed priority species and habitat characteristics.” This is a significant policy statement and priority criterion, but it is not included in the four tiers of criteria nor is its relationship to the criteria tiers explained. The discussion around priority species warrants more exposure (perhaps elevating to a 3.3.5 heading in the document?) and digestion. Have you considered moving priority species to a First Tier criterion as well?

#### 3.4.1) Research Approach

Page 17. This section discusses prioritization of research on critical uncertainties, but does not define or explain how critical uncertainties are identified. Perhaps this is a task of the upcoming research plan development, but it would be good to specifically state that here.

Page 18. Is effort-risk analysis the same as comparative risk analysis? If not, how do they differ or relate?

Page 19. Figure 4 would be much more helpful if a few examples were included in the text. How does placement on the grid result in different priorities? When does a high risk, high cost need trump a low risk, low cost need. The upper left quadrant is clearly a priority, and lower right would seem to be a lower priority; but, how the other half of the diagram would rank out is unclear. Many of our regional salmon recovery organizations use something similar (sometimes the axes are labeled benefit to fish and certainty of success), but within each quadrant there are clear up front criteria for ranking that help distinguish within each “bucket.”

Page 20. It isn’t clear here, but we trust consideration will be given to integrating the MERR an Research Plans into a single, coordinated plan.

#### 3.4.2) Monitoring Approach

Page 20. The second paragraph identifies that the Program requires some level of monitoring for all projects, but also allows for separation of monitoring efforts from individual projects. This is an important distinction and deserves further clarification: how would those situations be identified? By way of an example, in the past the WA SRFB also provided for monitoring of all projects, but found that approach did not produce information that was broadly useful in answering their questions. Subsequently, they transitioned to a programmatic approach that better informs their questions about the effectiveness of categories of habitat projects. Ultimately, this is a clear example of the import of “coordination” among activities, now a Third Tier priority.

Page 22. Figure 5 seems to imply that both low and high risk elements end up with the same level of monitoring effort. Is this correct? How does placement on the grid result in different priorities? How does this prioritization approach relate to that which is set forth in Section 3.3.4? And, as we suggested in our earlier comments on policies, the need for the Council to have consistent protocols is understood. But it is a very technically-based task, one perhaps more appropriately given to an organization such as the ISRP. Many research projects must be highly flexible and may adapt or even create protocols to fit the specific situation. Perhaps the Council could collaborate in a process to devise a balanced method that will allow for creative approaches without risking outcomes?

Pages 23 - 26. Definitions chosen for the Compliance, Implementation, and Performance Monitoring subsection may not align with those used by Washington. Specifically, we note these differences:

The last sentence in the first paragraph under Compliance, Implementation, and Performance Monitoring is inconsistent and would more appropriately and robustly state “... evaluates impacts at the action and project level, *and depending on the scale of the action or project, could be* at the watershed, population, or species scale.” Moreover, the plan does not clearly differentiate among performance monitoring, status and trends monitoring, and action effectiveness monitoring. All three seem to be defined in part as assessing biological and physical impacts.

The last paragraph in this section indicates that implementation data are already in PISCES. It further suggests performance measures will be needed at the action and project, and that they should be selected from the ISRP metrics report. It would help to clarify the similarities and differences between implementation data and performance measures, and their relationship to metrics used by the Pacific Coastal Salmon Recovery Fund.

The two sentences in the first paragraph under Status and Trend Monitoring are unnecessarily narrow in scope. We suggest deleting “undisturbed” from the first, and modifying the second to something like “... in order to assess *changes in status over time.*” Furthermore, in the second paragraph it is stated that the Council requires collaboration, suggesting coordination at least be a Tier 2 criterion in section 3.3.4. In addition, it appears habitat status and trend monitoring efforts like what is being implemented under the Washington Forum Framework across the state would not be possible in locations other than those identified as intensively monitored watersheds. Is that correct?

The first paragraph under Action Effectiveness Monitoring is inconsistently narrow compared to the content of Table 1. The first sentence should be revised to something like “...and its direct *physical or biological effect on the environment or on populations.*” It appears that MERR defines intensively monitored watersheds differently from Washington’s Salmon Recovery Funding Board (SRFB) and Comprehensive Monitoring Strategy, which may be confusing to project proponents, the Council, funding agencies and scientists. Further, as noted above for habitat status and trends, it appears a reach-scale effectiveness monitoring effort like what has been funded by the SRFB would not be possible in locations other than those identified as intensively monitored watersheds. Are these interpretations correct? If so, how will the Council’s action effectiveness monitoring efforts be coordinated with ongoing efforts funded by the State of Washington? How would a decision to use an independent party to gather effectiveness data be made? How would effectiveness monitoring data be rolled up?

Wouldn’t the “effort-risk analysis approach” also be appropriate where the “preponderance of evidence” (POE) assessment is mentioned for action effectiveness? And/or conversely, why wouldn’t the POE approach mentioned under action effectiveness be appropriate for research too?

### 3.4.3) Evaluation and Reporting Approach

Pages 27 - 31. This section would benefit from a thoughtful analysis of what kinds of reports, and for what purposes and users, the Council desires. There are multiple reports, some new, discussed in this section but it is not clear that each has a defined goal and audience. For example, is this Program Synopsis intended primarily as an evaluation tool, a reporting tool, or both? It is not clear how it relates to or complements high level indicator evaluating and reporting and fish and wildlife program indicator reporting? Will it draw from HLI/FWI indicators or synthesize other data in other ways? It is simply described as a “map” but it’s not clear how a map can depict shortcomings, and meet all the other stated ambitions and intentions (“...reflects information needed to inform Council decisions and to facilitate ISRP evaluation... guide implementation and adaptive management...”). Is there overlap

between what would be included in the Council's HLI report and the synopsis (e.g., the list of bullets to be included in the first iteration of the synopsis looks like what might be in an HLI report)? We believe it is vital that these reports be integrated to avoid repetition, and that data from one is captured seamlessly in the others.

#### 3.4.4) Data Management and Sharing Requirements

Page 32. It is probably axiomatic to say data management is the essential foundation to communication of MERR information. Without accessible data we cannot understand how we are progressing toward our goals, and we certainly cannot ask for more money from legislatures, Congress, and ratepayers to continue our work. Consequently, the Council must set the stage for maximum data access and sharing among Basin partners. We understand the sensitivity associated with this, but feel insistent on requesting that Council policies be clear, concise, and coordinated with other partners.

Consequently, we believe the data management approach should be more fully developed, and clearly call for compatible protocols, clarify what the Council's role, process, and expectations are for data management protocol adoption and use. (Note: one of the three protocols cited in earlier in footnote 23 is actually a data management protocol.) Is the standard calling for "RME data using common terminology" where a data dictionary fits? If not, then where?

Although not specifically identified as protocols, the requirement in the first sentence stating "...data must be made available in an agreed-upon electronic format," and the bullets of "basin-wide accepted standards" in the second paragraph are really expressions associated with protocols for data management. To be able to roll-up data, protocols for data management are at least as important as protocols for other aspects of MERR and the need for them should be stressed in this section.

The last paragraph in this section is unique within the entire MERR Plan, in that it makes explicit policy requests (in this case of BPA; e.g., "The Council strongly encourages Bonneville... also requests that Bonneville... also asks that Bonneville...") rather than policy statements. Here again, we stress the importance of a decision tree which would clearly show when the Council is making a decision and when that decision lies in the purview of others.

#### 3.4.5) Standardized Approach for Implementation Strategies

Unfortunately, these strategies were not available for all to review at the time we were looking at MERR. It would be helpful to look at them together, so we may have additional comments when these are released.