

Comments on the MERR Plan

Overall, the Draft Columbia Basin Monitoring, Evaluation, Research, and Reporting (MERR) Plan is well written and organized. The Plan provides a reasonable strategic plan, implementation framework, and implementation strategies. Nothing in the Plan caused concern or was inconsistent with the workgroup's assessments or recommendations for the RPAs related to RM&E. What follows are a few comments on the Plan.

1. The effort-risk analysis is intriguing. It would be useful to expand on this approach (i.e., provide more information and detail on the approach). Perhaps include an example of the analysis.
2. The use of "preponderance of evidence standard" for making decisions is a good alternative to using just the "95% confidence level" approach, since, as stated, the statistical evidence approach is not always feasible (e.g., sample size constraints, etc.).
3. In some places it was not clear how some of the processes and collaboration would take place. In other words, how will it be accomplished and under what process? There is mention of collaboration that is needed on various topics, and standardization of protocols, etc., but it is not clear how this will be accomplished.
4. The Plan indicates that all research and monitoring must apply scientifically sound study designs and analysis, and use protocols approved by the Council. The latter (must use protocols approved by the Council) may not be appropriate in all circumstances. Although it is clear why the Council added this statement, it should be understood that there are several different protocols available for measuring habitat conditions (ranging from coarse- to fine-scale assessments). A Council-approved protocol may be appropriate for measuring certain habitat metrics at one scale, but it may not be appropriate at all spatial and temporal scales. Unless the Council intends to review and make judgment on all available protocols (there are over 150 protocols/methods), the Council may need to exercise some flexibility with protocols.
5. It is not clear if the Council's process of prioritizing RME actions is consistent with the priorities of the Action Agencies and NOAA Fisheries. Under the FCRPS BiOp, the Action Agencies are required to conduct monitoring. The RME Workgroups have spent much time identifying the required amount of monitoring needed to address the RPAs. We understand that the framework developed by the Council has a much broader scope than the RPAs; however, it may not be good if an RME action recommended by the Workgroup was given low priority by the Council. Although we would hope that the four-tier criteria developed by the Council would not result in a prioritization list too different from the recommendations of the Workgroup, it should be noted that the criteria used by the Workgroup were not the same as those proposed by the Council.
6. Under Compliance, Implementation, and Performance Monitoring, the Plan indicates that the ISRP will assess whether actions and projects are having the intended biological and physical effects at the project level. What protocols will be used to monitor performance and how will this be accomplished? If a given action, for example, is to improve egg-to-fry survival within a stream reach, how will the ISRP determine if the

action actually improved survival? This seems to fall within the realm of action effectiveness monitoring at the project scale. The Plan needs to describe in more detail what is meant by “performance monitoring” and how it will be accomplished by the ISRP.

7. Under Program Synopsis, it states, *As a start the following information will be included in the first iteration of the Synopsis:*
 - *Up-to-date status of priority species and habitat characteristics in the Basin;*
 - *Summary of the progress made in addressing factors of concern, such as limiting factors;*
 - *Needs to be addressed, such as subbasin management plans’ limiting factors; and,*
 - *Program projects addressing the above needs, including past, current, and proposed projects.*

We suggest that the Council also review the limiting factors in the recovery plans since many of the limiting factors that were developed in the subbasin plans were updated in the recovery plans.

8. Under Data Management and Sharing Requirements Approach, it discusses six “basin-wide accepted standards.” The standards make sense, but it is not clear if these are truly accepted throughout the basin. One potential would be for the Council to develop a process that could ensure that there were basin-wide standards, so, for example, the PUDs in the Upper Columbia are collecting hatchery effectiveness data the same way as say ODFW in the Willamette Basin. We understand that PNAMP is a process that is attempting to standardize protocols, etc., but it is unclear how others, outside of the Council or BPA-funded projects, are implementing it.
9. Under Standardized Approach for Implementation Strategies, it states, *The Council requires that entities implementing RME and reporting actions under the Program coordinate with each other at the appropriate scale, such as evolutionary significant units, or at the subbasin or basin-wide level. The Council also requires that entities implementing actions through the Program coordinate with other entities implementing actions for other fish and wildlife programs. This coordination will help eliminate redundancies and maximize gains from invested resources.* It is not clear how this will be accomplished and under what process?
10. Under Appendix 2, in the last two bullets the MERR states:
 - *Adult Upper Columbia River steelhead survival performance standard for the reach between the Bonneville Dam and the McNary Dam is 84.5%.*
 - *Adult Middle Columbia River steelhead survival performance standard, specific reach variable, until standards are developed, assumed met if the adult Snake River steelhead performance standard of 90.1% is met for the reach between Bonneville Dam and Lower Granite Dam.*

In the first bullet above, why is the standard for UC steelhead (84.5%) for the reach (BNV-MCN) so much lower than for Snake River fish for a larger reach (90.1% between BNV and LGR)?

In the second bullet, why is the mid-Columbia steelhead standard measured to LGR? Lower Granite Dam is upstream of the DPS.