



Kootenai Tribe of Idaho

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Nancy Leonard
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Dear Dr. Leonard,

Thank you for the opportunity to comment on the draft *Columbia River Basin Monitoring, Evaluation, Research, and Reporting Plan* (Plan). The Plan is well written and establishes a monitoring and reporting framework for the Northwest Power and Conservation Council's (NPCC) Fish and Wildlife Program (Program). Moreover, the Plan sets a framework for individual anadromous fish, resident fish, wildlife and habitat monitoring strategies, where the strategies will be developed separately and consistently, and later adopted into the MERR as they are completed.

From a technical perspective, the Plan provides the guidance for sound decision making regarding monitoring and evaluation. The Plan will help evaluate project effectiveness, provide priority information to be collected, build annual assessments for program implementation, and supports the monitoring and evaluation of focal species status and trends, and action effectiveness.

The Plan has the following technical deficiencies that should be considered and addressed as the process continues.

- 1) The Plan is not consistent with the subbasin plans, where numerous priority species and habitat characterizations are missing from Appendix 4 list.
 - a. The Tribe understands the appendix list is intended to represent high level indicators for basinwide reporting, but there is a need for better guidance to the implementation strategy groups (Section 3.4.5; Page 33-35) to complete a prioritized list based on fish and wildlife species and habitat characteristics that can be correlated back to subbasin priorities.

- b. The list of priority wildlife species is HEP oriented and incomplete as far as the species that the agencies and tribes are managing. This list should be compared with the subbasin plans to ensure its completeness and accuracy.
- 2) Under the heading of Compliance, Implementation, and Performance Monitoring (Page 23-24) and Section 3.4.5 (Page 33-35), the Plan refers to data in several instances, but is not clear in the definitions of data, reporting scales, and descriptions between project or biological levels.
 - a. Direct emphasis on “comparable and compatible” data, basinwide consistency and comparability in data sets and data sharing.
 - b. The Plan is not clear about how the data will be evaluated or reported at different basin, subbasin and provincial scales (and without being prescriptive in how data should be collected and/or analyzed).

From a policy perspective, the Plan raises several issues that need additional consideration and clarification.

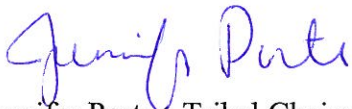
- 1) On page 33, Data Management and Sharing Requirements Approach, it is assumed that the regional agencies and tribes have “agreed” that Taurus or PISCES is the appropriate location for storing and managing biological data.
 - a. The Plan refers to BPA to take a lead role in developing a common database for biological information and facilitate sharing biological data among entities within the basin. There are references elsewhere in the document to Upper Columbia United Tribes M&E program, CBFWA, ISRP, and ISAB data efforts. While the Tribe agrees that BPA should be involved in this effort, the decision that BPA house/manage the master database of biological information for the region is premature. Numerous agencies and Tribes are engaged in this effort, and we believe that there are many alternatives and models for databases and data networks. This section of the Plan could better represent the partnerships that will be required to successfully share, assess, and report the information necessary to support Program evaluation.
- 2) Regional fish and wildlife managers have begun to facilitate “implementation strategies” efforts, where these efforts are relying on the draft Plan document (i.e., outline for monitoring implementation strategies on Page 34). It is anticipated that when the NPCC begins to work on individual implementation strategies, they will reach out to fish and wildlife managers across the region. In that way, NPCC can ensure all stakeholders are represented in the construction of those strategies.

- 3) The Plan provides an opportunity to categorize the services of the CBFWA Status of the Resource Report (SOTR), Upper Columbia United Tribes M&E program, along with BPA and NPCC web tools, in support of Program implementation and evaluation. The regional fish and wildlife managers have emphasized the need for “comparable and compatible” data sets for reporting biological information, but it is unclear how the Program Synopsis will facilitate and ensure this large, diverse regional effort.
- 4) Finally, there is a need to understand how this document will be implemented in the future. The Tribe encourages the NPCC to consider defining that neither the MERR nor any policy guidance that results from the MERR transfers or defers the mandated authorities and responsibilities of the fish and wildlife managers to the NPCC. The MERR Plan should provide guidance for policy decisions, but not set those policy decisions.

Through development of the *Columbia River Basin Monitoring, Evaluation, Research, and Reporting Plan* and related monitoring and evaluation of Tribal projects, the Kootenai Tribe of Idaho continues its commitment to supporting basinwide assessments of status and trends for fish, wildlife, and their habitats.

We look forward to working with NPCC staff to complete the Implementation Strategies, and support this effort to develop a monitoring and evaluation framework for the Fish and Wildlife Program.

Sincerely,



Jennifer Porter, Tribal Chairwoman
Kootenai Tribe of Idaho

cc: BPA, Greg Delwitch
CBFWA, Brian Lipscomb
UCUT, DR Michel
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Billy Barquin, Tribal Attorney