



State of Washington
Department of Fish and Wildlife

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Ms. 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 Northwest Power and Conservation Council's (Council) "Draft Columbia River Basin Monitoring, Evaluation, Research, and Reporting (MERR) Plan, 2010-4." Overall, the MERR Plan is well organized and well thought out, and should provide the necessary information to establish a framework for monitoring, evaluation, research, and reporting in the Basin. However, there are omissions or oversights that need to be addressed. I have assembled Washington Department of Fish and Wildlife comments below for your consideration.

There is no mention of the potential cost not only to implement the monitoring, evaluation, and research in the MERR Plan, but also to build and maintain the associated data management infrastructure needed to carry out the reporting element of the plan. For example, data standards, sharing, and agreements all represent costs in terms of time, expertise, and software or hardware investments. Developing the data management systems to manage the MERR Plan as described is not cost-neutral, so there needs to be the appropriate level of acknowledgement regarding costs, potential trade-offs, and who bears the burden of those investments.

The MERR Plan would benefit from additional review as a comprehensive package once its elements and appendices are complete. In the meantime, a better description of how you intend to roll out and update the document elements would be helpful. There are references to the MERR Plan as a "living document" and its elements as "dynamic in nature" but there is very little detail or discussion about how this information will be stored, maintained, updated, or reviewed in a manner that is both dynamic and transparent. For example, research needs and monitoring needs change annually or semi-annually, with significant potential for review and updating during Federal Columbia River Power System Biological Opinion reviews. Much of the detail for the implementation strategies and data collection and management infrastructure is currently being crafted and updated. How will all of this information be kept current and by whom? This topic needs further clarification with emphasis on who will be responsible for which elements and the associated maintenance cost.

We have some concerns about the list of species and habitat characteristics in Appendix 4. A number of species included in the list were species that were identified as representatives of a particular habitat type in wildlife habitat loss assessments (i.e., used for a Habitat Suitability Index model in the Habitat Evaluation Procedure), rather than representing a species that their estimates of population abundance would be a useful indicator of the performance of the Council's fish and wildlife program. Also, a few species included in the list are species that do not serve as representatives of wildlife habitat mitigation, but were included because they are piscivores. While we recommend monitoring piscivorous species, they should be included in a separate category to not be confused with other wildlife species that could be tracked to represent performance of wildlife mitigation and ecosystem health. Finally, Appendix 4 could be improved by including information for priority fish, wildlife, and habitat information already identified in the subbasin plans and the state Comprehensive Wildlife Conservation Strategies/Wildlife Action Plans that were also already vetted through public processes.

We have questions about how the MERR Plan will incorporate past, existing, and new M&E efforts in the Basin. For example, over the past year, we have been working with other fish and wildlife agencies and tribes on the Wildlife Monitoring Implementation Strategy and look forward to finalizing an approach (i.e., the future Appendix 8) that would meet the Council's needs and would be complementary to other state, federal, tribal wildlife and habitat monitoring efforts.

Finally, there are several areas in the document where performance standards, high level indicators, high level questions, management actions, and other performance- or action-related measures are discussed (e.g., pp. 6, 11, 14). The document would greatly benefit from additional references and more attention to defining these measures and explaining their relationship to one another. A simplified diagram may be helpful for the non-technical audience.

Thank you again for the opportunity to comment on the MERR Plan. Please contact me if you have any questions at (360) 902-2559 or erik.neatherlin@dfw.wa.gov.

Sincerely,



Erik Neatherlin

cc: Bill Tweit
Nate Pamplin
Paul Dahmer
Steve Vigg
James Uehara