



May 19, 2009

Dr. Nancy Leonard
Northwest Power and Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, OR 97204

Dear Doctor Leonard:

Thank you for the opportunity to comment on the Northwest Power and Conservation Council (Council) Fish and Wildlife Program's draft High Level Indicators (HLIs). The members of the Federal Caucus contributing to this letter¹ support the development of a consistent set of HLIs to facilitate the clear communication of the shared progress and performance of our respective programs to the public, state governments, and Congress. An effective set of HLIs will integrate monitoring information across many regional entities and will align the reporting needs, as much as practicable, of state, tribal, and federal agencies in the Columbia River Basin. The Council's proposal has reinvigorated the discussion of HLIs among the Basin's natural resource managers. The Council's draft HLIs are an important step in outlining reporting needs in the Basin. We are pleased to partner with the Council to ensure that any HLIs adopted by the Council are consistent with and compliment other regional monitoring and HLI reporting efforts. Below are some general observations and comments on the Council's draft HLIs.

For HLIs to effectively communicate a program's progress and performance, it is critical for the management questions and targets to be clearly defined. The Council's draft HLIs would benefit from a description of the management questions and targets that are intended to be addressed by each indicator. Without this essential context, it is difficult to evaluate whether the proposed HLIs will accurately reflect the Fish & Wildlife program's performance, and it is difficult to ensure that the proposed HLIs are consistent with the reporting needs of other regional managers. An articulation of the targets associated with HLIs will afford more transparent adaptive management. Additionally, it is not clear from the descriptions of the draft HLIs what the exact metric(s) being proposed are, how they would be derived, or the temporal/spatial scale over which they would be "rolled up" for reporting. These details are necessary to determine the extent to which monitoring data currently exist to support these indicators, and whether the proposed indicators are consistent with other regional reporting efforts.

In refining the Council's HLIs, we encourage you to take advantage of existing reporting mechanisms and data portals. Many of the Federal Caucus agencies already report our results and accomplishments thru a variety of mechanisms (e.g., Bonneville Power Administration's PISCES database, NOAA Fisheries' Pacific Coastal Salmon Recovery Fund and Public Consultation Tracking System databases,

¹ These comments reflect input from the Bonneville Power Administration, NOAA's National Marine Fisheries Service (NOAA Fisheries), US Army Corps of Engineers, US Geological Survey, Environmental Protection Agency, Bureau of Reclamation, and US Fish & Wildlife Service. The US Forest Service and Bureau of Land Management elected to abstain from this comment letter. The enclosed comments reflect the general agreement of the participating agencies. However, agencies may also submit individual and more detailed comments to better articulate their agency-specific perspectives.

StreamNet, the Environmental Protection Agency's State of the River Report, and Columbia Basin Fish and Wildlife Authority's (CBFWA) Status of the Resources Report). Additional reporting mechanisms should be coordinated with these existing efforts to avoid duplication and ensure consistency. With respect to the proposed implementation HLIs that would rely on information in the PISCES database, the Council should be aware that substantive changes to the database are being implemented to satisfy reporting requirements under the Federal Columbia River Power System Biological Opinion. We encourage the Council to work with NOAA Fisheries and the Action Agencies to ensure that any implementation HLIs reflect the changes to PISCES that are underway.

Finally, we believe that the refinement of the Council's draft HLIs would benefit greatly from active coordination with other ongoing regional efforts to develop and refine HLIs. CBFWA's 2009 Status of the Resource Report will reflect considerable input from both Council and Basin co-managers on HLIs and appropriate spatial scales of reporting. In support of the Northwest Environmental Information Sharing (NWEIS) summit, the Pacific Northwest Aquatic Monitoring Partnership (PNAMP) has conducted an inventory and comparison of regional HLIs and is developing recommendations and criteria for evaluating the efficacy of potential HLIs. The Oregon Plan for Salmon and Watersheds and Washington's State of Salmon in Watersheds reports reflect a decade of reporting and indicator refinement and are a great asset in developing a common set of HLIs in the Columbia River Basin. Active coordination with these efforts will be essential to ensure that the Council's HLIs contribute to and are consistent with regional reporting on the status and trends of natural resources and the program's accomplishments in their stewardship. Coordinated development of HLIs will serve to strengthen the region's communication with Congress/Public/Governors by assuring that a consistent message is conveyed by all entities in the basin.

We are pleased to work with the Council to refine the proposed HLIs. We suggest convening a workgroup to better define our shared management questions, identify the appropriate indicators, and determine the existing and needed data to support them. Please contact the co-chairs of the Federal Caucus RM&E Team (Jim Geiselman, 503-230-5732; Dr. Scott Rumsey, 503-872-2791) to schedule a meeting or if you have any questions.

Sincerely,



Robert G. Walton
Vice-Chairman, Federal Caucus

*On behalf of the Bonneville Power Administration,
National Marine Fisheries Service, US Army Corps of
Engineers, US Geological Survey, U.S. Environmental
Protection Agency, Bureau of Reclamation, and US Fish &
Wildlife Service*

Cc: Federal Caucus Agencies