

COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

729 NE Oregon, Suite 200, Portland, Oregon 97232

Telephone 503 238 0667

Fax 503 235 4228

May 10, 2010

Dr. Nancy Leonard
Northwest Power & Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

Dear Dr. Leonard:

Thank you for the opportunity to comment on the draft *Columbia River Basin Monitoring, Evaluation, Research, and Reporting Plan (Plan)*. Although the plan establishes a draft monitoring and reporting framework for the Northwest Power and Conservation Council's (Council) Fish and Wildlife Program (Program), there are several technical and policy issues that need to be addressed. In order for the Plan to provide the necessary guidance to improve monitoring activities and coordination under the Fish and Wildlife Program within the Columbia Basin, we have summarized these issues below.

From a policy perspective, the Plan raises several issues that should be considered. When these and the technical shortcomings are addressed, the Plan can provide the guidance for sound decision making regarding monitoring and evaluation.

1. The Plan and the process as presented does not adequately address the policy and legal framework within which it will be implemented. The Plan makes little or no mention of the 2008-2017 *U.S. v Oregon* Management Agreement, the Columbia River Fish Accords, or the Biological Opinion Remand process and associated Adaptive Management Implementation Plan. This is a long-standing concern with various Council actions and may jeopardize implementation of the final version of this Plan.
2. The Plan is not consistent with priorities in the subbasin plans. Several priority species and habitat characterizations are missing from the lists included in Appendix 4. Additional guidance to the groups developing the Implementation Strategies may be necessary to help complete the prioritized list for resident fish and wildlife where basinwide priorities are missing from the current Program.

3. The Plan provides an opportunity to identify the role and function of the Status of the Resource Report (SOTR), along with BPA and NPCC web tools, in support of Program implementation and evaluation. The fish and wildlife managers have made the SOTR their priority for reporting biological information for the Program. We recommend that the SOTR, perhaps in a modified form if necessary, serve the role of the Program Synopsis called for in the MERR.
4. The roles and responsibilities of parties affected by the MERR need to be described and agreed upon. For instance, on Page 33 of the Plan, the Council asks BPA to take a lead role in developing a common database for biological information and to help facilitate sharing biological data among entities within the basin. We do not agree that BPA should manage a master database of biological information to support Program evaluation. That is the appropriate role of the fish and wildlife managers, not BPA. We are currently engaged in this conversation for listed anadromous fish through CBFWA and PNAMP, in partnership with BPA, and believe that our efforts there could be a model for developing data sharing networks for resident fish and wildlife. This section of the Plan should incorporate the partnerships that will be required to successfully share, assess, and report the information necessary to support Program evaluation.
5. The fish and wildlife managers, through CBFWA, have begun to facilitate efforts with both CBFWA members and non-members to develop monitoring implementation strategies for fish and wildlife in the Columbia River Basin. These efforts are relying on the draft Plan document and are building off the outline presented for monitoring implementation strategies on Page 34.

We encourage the Council to join our efforts, already underway. In that way, the Council can ensure all stakeholders are represented in the construction of those strategies. We look forward to working with staff to complete these strategies as quickly as possible.

6. Finally, we would like to better understand how this document will be used and implemented. We suggest the Council consider adopting the draft Plan as a policy guidance document while the implementation strategies and other missing elements are being developed. Once those pieces are completed, the Council should adopt the Plan and the associated implementation strategies into the Program during the next 5-year update.

From a technical perspective, there are five areas that should be addressed before the Plan can fulfill its potential.


1. The Plan is bewilderingly, and probably overly, complex. The Plan contains ten Expectations, fifteen Policy Guidance statements, nine Management Questions, four Performance Standards, 10 Prioritization Criteria organized into four tiers, forty-five Biological Objectives organized into various priority categories, plus additional Performance Standards, Biological Indicators, and Implementation Indicators. The Plan does not adequately describe how these items will be used to guide and implement Council decisions and monitoring actions nor evaluate and report on Program progress. Before creating another complex layer of details, policies and processes on top of an already complex existing system, the Plan should clearly describe the need and use for the new structures and why existing processes cannot be adapted to achieve the same ends.
2. One way to manage information and assumptions about complex ecological and programmatic systems is through the use of qualitative and quantitative models. Creating such models would create a common explicit framework to organize and understand the complexity described in the MERR Plan. Such models are most useful for understanding the system being managed, can more easily integrate new information, lend themselves to adaptive management decisions, and lead to better decision support and communication tools. We recommend the Plan include development and use of these types of models.
3. We also recommend the Plan address the problem of coordinating monitoring sampling designs across agencies and at different spatial scales. Answering many of the region's higher-level questions and concerns requires the existence of comparable data collected across different subbasins and population units. These data cannot be developed without using standard sampling protocols and statistical design. The EMAP/GRTS sampling framework can achieve some of this standardization, especially for habitat data, but may be inadequate to address all the fish and wildlife population monitoring needs. Yet other sampling frameworks may be needed to monitor for and detect changes due to climate change impacts.
4. The draft Plan does not adequately describe how it would be coordinated with related monitoring efforts of other agencies, especially federal agencies such as the Forest Service, Bureau of Land Management, and the Geological Survey. Greater coordination and collaboration with monitoring efforts outside the Fish and Wildlife Program are needed to use dwindling resources most efficiently and control overall monitoring costs.
5. The MERR Plan cannot be adequately evaluated or adopted until many of the missing elements, especially the sections on Implementation Strategies are

developed. The Plan makes reference evaluating the impacts of climate change (p 45) but in such a general way as to be unhelpful. We recommend the Council review the USGS National Ecosystem Observation Network (NEON) for guidance in detecting and evaluating climate change impacts, and incorporate applicable strategies into the MERR Plan.

6. Finally, we note that the MERR Plan would require significant additional effort to collect, manage, interpret, and report large amounts of additional data and information for its implementation. The Plan must clearly describe how this will be accomplished. The roles of the various agencies and participants must be clearly described. The anticipated additional resources (people, equipment, and funding) and their and the source of those resources must be specified. Unless the Council will bear the entire cost of the program, this will have to be a very collaborative process to ensure appropriate cost-share arrangements are realistic.

We support this effort to develop a monitoring and evaluation framework for the Program and look forward to working with you in the future to address the above issues and concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Babtist Paul Lumley', with a small 'sor' written at the end of the signature.

Babtist Paul Lumley
Executive Director

cc: Herb Jackson, Nez Perce Chairman, Fish and Wildlife Committee
N. Kathryn Brigham, Umatilla, Chairwoman, Fish and Wildlife Committee
Bruce Jim, Warm Springs, Chairman, Fish and Wildlife Committee
Virgil Lewis, Sr., Yakama, Chairman, Fish and Wildlife Committee