



The Confederated Tribes of the Grand Ronde Community of Oregon

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Northwest Power and Conservation Council
ATTN: Ms. Nancy Leonard
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

Sent via email

Dear Ms. Leonard:

The Confederated Tribes of the Grand Ronde Community of Oregon (Tribe) would like to thank you and the Northwest Power and Conservation Council (Council) for this opportunity to comment on the draft Monitoring, Evaluation, Research and Reporting Plan (MERR Plan). On behalf of the Tribe I would like to offer the following comments:

General Comments

The draft MERR Plan outlines a conceptual framework that appears to potentially transfer the physical and biological information collected on the ground into a format that will inform policy-level individuals, and assist them in formulating effective management decisions. The Tribe believes this conceptual framework will effectively and efficiently facilitate reporting program progress.

However, as Tribal staff reviewed the draft MERR Plan, a central concern became evident. This concern is that the current draft of the Plan is a conceptual design and not a working plan. In terms of planning documents, the phrase "the devil is in the details" came to mind, and the draft Plan does point out the need for the development of quantifiable biological objectives and implementation strategies. These metrics as well as performance standards, particularly for resident fish and wildlife, need to be addressed in the MERR Plan.

Specific Comments

In past solicitation processes, project Research, Monitoring and Evaluation (RM&E) was capped at 5% of the project's expense budget. Does this budget cap still exist? If not, that should be made explicit in the Plan. If so, the Independent Scientific Review Panel (ISRP), the Council, and Tribal, state and federal managers need to be aware of the limitations imposed by the budget cap in regards to future review processes.

Habitat Evaluation Procedures (HEP) are used to determine wildlife losses and wildlife credits. The ISRP has deemed the use of HEP to be an ineffective tool for monitoring vegetation, but the Tribe would argue that HEP was used to determine the baseline losses, and it would make sense to base high level indicators, performance standards, biological objectives, and wildlife credits on HEP, at least to some extent. The Tribe agrees that population response and vegetative response must use tools beyond HEP's capabilities, and that additional performance measures, biological objectives, and implementation strategies need to be developed, but feels that HEP must be utilized at least for the reporting of habitat credits.

Another Tribal concern has to do with resident fish loss assessments. As these are developed, what would the performance standards, biological objectives and implementation strategies resemble? What processes have been planned for the development of performance standards, biological objectives and implementation strategies? The MERR Plan should address these questions.

Under Section 2.3, "Policy Guidance", the draft MERR Plan suggests to "use protocols approved by the Council." Would this take the form of a recommended list of protocols? Would the Council provide a web link so that project proponents could readily access these protocols? How adaptive would this list be as new technology and methodologies are developed that prove to be more efficient and effective? The MERR Plan should address these questions.

Conclusion

In summary, the Tribe believes the draft MERR Plan outlines an effective conceptual design for reporting information to policy-level decision makers. But the draft Plan is far from complete as some significant components of making such a plan realistic are absent. The Tribe would very much appreciate working collaboratively to develop quantitative biological objectives and implementation strategies with the Council and other interested parties.

Thanks again for this opportunity to submit comments. If you have any questions, please contact either Lawrence Schwabe at 503-879-2395 (email Lawrence.Schwabe@grandronde.org) or Michael Karnosh at 503-879-2383 (email Michael.Karnosh@grandronde.org).

Sincerely,



Michael Wilson
Natural Resources Division Manager