



Independent Scientific Review Panel

for the Northwest Power & Conservation Council
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Memorandum (ISRP 2012-21)

December 20, 2012

To: Rhonda Whiting, Chair, Northwest Power and Conservation Council

From: Rich Alldredge, ISRP Chair

Subject: Response Review of the Willamette Wildlife Mitigation Program (#2011-003-00)

Background

At the Northwest Power and Conservation Council's request (November 19, 2012), the ISRP reviewed a response for the Oregon Department of Fish and Wildlife's Willamette Wildlife Mitigation Program (WWMP) (#2011-003-00). This program was established by the Willamette River Basin Memorandum of Agreement regarding Wildlife Habitat Protection and Enhancement between the State of Oregon and the Bonneville Power Administration in October 2010. The program has developed a new public process and criteria to be used for prioritizing project proposals for land acquisition using funding from BPA. The program's habitat protection and restoration focus is on protecting those habitat types that have been identified as most at risk in the Willamette basin.

The ISRP reviewed an earlier version of this proposal and requested a response ([ISRP 2012-14](#), September 26, 2012) that focused on selection criteria for acquiring lands. The ISRP recommended that the protocols for monitoring and evaluation of lands purchased should be reviewed in the future. The ISRP also had questions about management plans for previously acquired properties. The ISRP's review of the project sponsors' responses to these issues follows below.

Recommendation

Meets Scientific Review Criteria (Qualified)

A number of improvements have been made to the proposal, especially in the areas of management planning for acquired parcels; program and project monitoring; project selection criteria; and the organization and procedures for the selection process. The proposed improvements in direction for management plans; program and project monitoring and evaluation; and development of a comprehensive program database and data management system are all major items that are not scheduled for resolution and implementation for at least 18 months. Given the current list of completed acquisitions and the lack of planning and

monitoring for them, further delays in direction will only aggravate the backlog of work and the ability to develop an efficient program. The fact that this is an ongoing program amplifies the urgency to establish a solid direction.

Qualifications:

- 1) During contracting, a clear interim set of directions is needed, until such time that long term program direction is completed. In addition, a reasonable timeline for the development or acquisition of a program database and data management system should be provided.
- 2) A complete plan for program and project monitoring and a framework for adaptive management should be provided to the ISRP for review by January 2014. The ISRP would also like to see the application form used for 2012 and 2013 proposal reviews as well as the revised 2014 form.

Comments

The program is a valuable one and fits well in the existing network of conservation areas in the Willamette Valley. Further, proposed property acquisition can improve connectivity between upstream/upland restoration activities and the lower portions of the river.

There are three essential components to successful conservation programs: 1) Identifying, acquiring properties and engaging the public to take responsibility for the long term, 2) monitoring to see that objectives are attained, and 3) using adaptive management effectively to adjust the course as conditions change or issues arise. This program identifies properties and potential partner groups, which is absolutely essential, but does not establish monitoring criteria and a plan for adaptive management, which are also essential. The current proposal presents a general framework for monitoring and adaptive management, but these topics are not developed. The proposal identifies that development of a monitoring plan will soon begin and should be ready for pilot testing in 2014. The project sponsors state they would welcome an ISRP review of the monitoring protocols as they are more fully developed. The ISRP believes that such a review would be beneficial. A framework for adaptive management should also be provided to the ISRP for review.

The sponsors have provided a generally effective response to the ISRP comments. The letter and table provided an overview and general location of responses to ISRP comments. However, the changes made to the project narrative were not marked or highlighted making identification of specific changes more difficult. Although the content and detail of the proposal is improved, further work on its organization and the clarity of the narrative would enhance readability and understanding. Currently, information on topics such as management planning and monitoring are spread throughout. Consolidating this information into individual sections would improve clarity.

Comments from the ISRP September 26, 2012 review ([ISRP 2012-14](#)) are numbered, indented, and *italicized* below. The ISRP's comments on the responses to each of these issues follow each numbered item.

Deliverables, Work Elements, Metrics, and Methods

1. Management Plans. Needed information includes discussion of the format and content of management plans that are to be developed for each parcel acquired since signing of the MOA, and if possible for parcels acquired before the MOA.

The response provides information on the process that will be used to develop management plans for each parcel. The project application template will be designed to provide an outline of management plan elements “including basic information on maintenance funding, proponent capacity and experience to manage the proposed acquisition, current and desired future condition of the site, and public access.” Additionally, the response provides a useful description of ODFW’s Decision Support System (DSS) and how they plan to link this work into DSS. The list of acronyms on page 48 should be updated to include DSS.

Management Plans are a critical component to the WWMP. The revised proposal provides more detail and direction on the timing, content, and application of management plans for acquired parcels. Additionally, the requirement for the update and/or revision of these plans, at least every five years, will ensure their long-term utility. Attachment 8, Section IIIB of the BPA/ODFW MOA, is referenced in the proposal as a primary source of direction for management plans. It provides clear and comprehensive guidance on the content and purpose of management plans. As stated on p. 36 of the proposal, “ODFW plans to develop a template for management plans on WWMP property.” The information in Attachment 8 appears to provide sufficient detail for near-term development of the template. Unfortunately, there is no time frame provided for development of the management plan template. Given the backlog of recently acquired parcels needing these plans, a concerted effort to complete them seems critical. A schedule or completion date for the management plan template is needed as well as a schedule for completion of plans for parcels acquired since the signing of the MOA. It seems reasonable that interim management plans could be completed in the near term and then finalized upon completion of the monitoring program direction, which is to be adopted in 2015 (see timeline on development of the monitoring program, page 35 of the proposal). For these initial plans, annual monitoring procedures, as described on page 36 of the proposal, could be used for the management plans.

Additionally, there is some confusion regarding responsibilities and the review process for management plan completion. According to Section IIIB of Attachment 8 of the MOA, Property Management Planning, “.....ODFW shall typically complete a draft plan for BPA, collaboration group, and public review within 18 months after closing, and provide for management of the property to achieve and maintain an agreed upon desired future condition.” This is different than direction in the proposal, page 35, “As indicated in Attachment 8, for draft management plans, review will be completed by project partners within 18 months of closing. Draft

management plans will be reviewed by BPA and ODFW as described in the Agreement.” The apparent differences between the primary responsibility for plan completion and the groups reviewing each plan should be resolved.

2. Details concerning implementation, effectiveness monitoring and evaluation

The sponsors clearly outlined their plans to form a monitoring team and identified a timeline that will begin in 2013. The response describes implementation, compliance, and effectiveness monitoring as parts of the overall WWMP monitoring program. Details of these plans will be developed over the next one and a half years. The ISRP appreciates the detail the sponsors provided concerning their thoughts about monitoring efforts. Additionally, the revised proposal contains a good deal of discussion regarding a range of needed monitoring activities. There is direction and required reporting elements provided for annual monitoring and property owner submittal of annual monitoring reports until formal WWMP monitoring direction is completed in 2015. A general approach and timeline is provided for the development of a comprehensive, WWMP monitoring program, entailing the use of an interagency Monitoring Team. This team will focus on developing specific long term monitoring strategies and a protocol that will be used by all sponsors in the program to conduct monitoring activities on acquisitions.

Given the critical nature of monitoring and evaluation to the long term success of this program, additional detail in the development plan and schedule is needed to help ensure tracking progress and timely completion of the program monitoring plan. This detail could include a summary of specific monitoring types and questions for the program, identification of lead responsibilities for oversight of plan development, and identification of critical sub-tasks for ensuring progress.

The sponsors’ plan to hold an annual WWMP monitoring meeting to share monitoring results is an excellent idea. Furthermore, the sponsors’ suggestion that the ISRP review monitoring protocols in the future should be pursued.

Specific Comments on the Acquisition Prioritization Criteria

- 1) The current selection approach is heavily weighted towards operational/administrative considerations and does not incorporate a number of important ecological considerations, many of which are noted in the proposal or in the Oregon Conservation Strategy. In its current form, only 1 of the 9 model criteria (Habitat Type and Condition) addresses ecological considerations. This represents only 6 of the possible 18 total points assigned by the model.*

A number of important ecological considerations are addressed in the section “Program Objectives and Mandatory Requirements.” These include: parcel scope and scale to support species at the population scale; parcel size relative to location in a

developed landscape; presence of unique or rare habitats or species assemblages; and maintenance or enhancement of protected habitat connectivity. Also, whether a parcel adds to the effective area of an existing conservation area, protected habitat should be considered. One approach to better incorporate these considerations into the model would be to break the criteria model into two components, one addressing ecological considerations and the other addressing operational and administrative considerations. Scores from each could be combined for a total parcel score and used for parcel prioritization. This would allow more careful consideration and ranking of important ecological aspects of each parcel while also addressing important operational and administrative aspects important for long term parcel management.

The response presents revised project selection criteria and separates them into groups, “Ecological and Cultural Considerations” and “Operational and Administrative Considerations.” The response also includes more information about resilient and properly functioning habitat, connectivity, non-cost scores, dual credit projects, and criteria development.

The entire Project Selection Criteria document (Attachment B) is more clearly written and presented than the original version. The revised document provides a detailed, well thought out process for project review and selection. The organization and description of the project selection process and the revised model are improvements over the initial proposal. More information on the composition and roles of the Collaboration and Review Groups was helpful. The rating criteria, their descriptions and scoring, the use of non scoring social/economic considerations, and the commitment for periodic review and adjustment all strengthen the model used to rank projects. However, a number of ecological considerations still do not appear to be fully represented. These were identified in the last ISRP review and include parcel scope and scale to support species at the population scale; parcel size relative to location in a developed landscape; presence of unique or rare habitats or species assemblages; maintenance or enhancement of protected habitat connectivity and whether a parcel adds to the effective area of an existing conservation area, protected habitat should be considered. It is not clear why these factors were not included in the revised model. Additionally, there appears to be duplication in scoring “Restoration Capability” in Ecological and Cultural Considerations and in “land owner restoration capability” in Operational and Administrative Considerations. It appears most appropriate in the operational criterion.

Also, although the need to meet the acreage target for the mitigation agreement is important, it appears that concern for selecting parcels with the lowest cost/acre may affect the long-term ecological benefits of the aggregate of acquired parcels. First, the situation of a parcel costing more per acre but having comparable or reduced long-term costs due to lower restoration costs/needs does not seem to be considered. Second, it seems very possible that a smaller total acreage, that includes a careful mix of high quality, strategically located habitats, could very well provide higher total ecological benefits than a larger acreage of lesser quality and less strategically located mix of parcels. This represents a major challenge for the program and also underscores the importance of program-scale monitoring for tracking progress towards the mitigation acreage targets and in meeting goals for ecological benefits.

- 2) *The relation between the section on “Program Objectives and Mandatory Requirements” and “Project Selection Criteria” is unclear. Rather than being mandatory requirements, it is stated that “projects should emphasize” a list of 9 items. The items are a mix of important ecological attributes that likely could be included in the Selection Criteria model (Items 1a, b and c and 2f). Omission of these important ecological attributes in the selection model appears to be an oversight. The proposal states that the Oregon Conservation Strategy forms the basis for the program. Most of the ecological attributes found in the Objectives and Mandatory Requirements section are addressed in these chapters and it is unclear why they were only partially included in the model used to rank parcels. In its current form, these attributes are not given any selection points and presumably do not influence the overall ranking or priority of individual parcels.*

This issue is adequately addressed in Appendix B.

- 3) *Under “Habitat Type and Condition” there is a strong emphasis for parcels that are intact and fully functioning. These parcels presumably need little or no restoration. However, there are two additional criteria that provide points for restoration of a parcel, namely “Restoration Capability” and “Restoration Project Manager/Conservation Landowner Capability,” each with a maximum score of 3 points. It appears that a parcel needing minimal or no restoration could lose up to 6 points for restoration and receive a lower total score which does not appear to make sense.*

This issue is resolved in Appendix B of the revised proposal.

- 4) *Also within the “Habitat type and Condition” criteria a more complete definition of “high resilience level” and a better description of “properly functioning habitat” are needed. The ISRP suggests identifying multiple components and or characteristics that would be expected in habitats that indicate resilience and proper functioning. These may be best provided with examples from the literature or sites in the Willamette Valley that do and do not meet these criteria. As a start, the authors could use NOAA’s Properly Functioning Conditions for salmonid habitat as a way to elucidate these habitat features. The ISRP suggests that authors target a minimum size parcel and acknowledge that some species are sensitive to area.*

A clear description of components/characteristics describing resilience and properly functioning habitat is not adequately addressed in the revised proposal. The concern is that without more explicit development of how these ideas will be assessed, they are not valuable, practical criteria. Also, “Habitat condition” is included as a criterion but is assigned a lower score than

any other criterion under Ecological and Cultural Considerations. Given the importance of this characteristic, justification for assignment of this relatively low score should be provided. The sponsors mention proposal reviews from 2012 and 2013. The ISRP would like to see the application form used for these efforts, as well as the revised form for use in 2014.

- 5) *Currently, the authors make general statements regarding criteria for connectivity among lands as a component of habitat location. Are there priority areas that would help connectivity or is this general statement about connectivity? Are the authors referencing connectivity as it is related to land ownership? Is it related to cover type? The authors should more fully define the idea of providing connectivity among habitats with the planned acquisitions. An example that highlights gaps in connectivity could be a useful in explaining connectivity as a criterion. Some measure of connectivity that would be provided by the purchase should be used as selection criteria.*

The sponsors added connectivity as a habitat type criterion and clarified their meaning of connectivity.

- 6) *The presentation and use of the Acquisition Cost criteria is not clear. It is stated that "The acquisition cost of each parcel will be used along with all of the non-acquisition cost criteria to rank projects each year." The score is in numerical order and is a ratio of non-cost scores to cost per acre for each project. An explanation of what non-cost scores include is needed. Presumably this is the total points for all other criteria /acquisition cost per acre. A summary listing or clarification of these elements is needed. It also appears that very small differences in scores among projects, could influence numeric rankings in the same manner as relatively large differences. Given the qualitative nature of many of the individual criteria rankings, further discussion is warranted.*

The response clearly explains how the acquisition cost, along with the criteria score, will be used to develop project ranking.

- 7) *Cultural values as a selection criterion need to be better defined and described in the current document. The tribes will be instrumental in these determinations and should be included in this effort.*

This is addressed in the revised proposal.

The possible role of the State Historic Preservation Office in identifying historic/cultural values that may exist should be considered.

- 8) *The 10% dual benefits standard as agreed upon in the MOA should be more fully developed, so that this is clear to all parties. If 10% of the funds are to have dual benefits some formula for evaluation of this standard should be clearly presented.*

The response explains that the 10% dual benefits standard is a settlement requirement rather than a criterion.

- 9) *In the “Criteria for Long Term Operations and Maintenance” there are considerations given for planning to secure maintenance funds and landowner capability for maintenance. These aspects for a proposed parcel would be difficult to address unless a Management Plan is also proposed. Such a Plan would likely spell out the scope and scale of operation and maintenance needs for a parcel. The same holds true for criteria addressing Restoration Capability (includes consideration of desired restoration at a site) and Public Access (details for access are to be determined in the Management Plan for a parcel). Further consideration should be given to including management plans as part of the proposal.*

The response indicates how management plan information will be included in the review process. However, there is some difficulty in linking the use of management plans with the listed criteria – perhaps add a management plan as a criterion under Restoration Project Manager or Conservation Landowner Capability to ensure that these plans are valued and help guide restoration. Also, the difficulty of identifying restoration needs/ treatment types and general costs prior to completion of a management plan remains a concern. In order to recognize the relatively low confidence for such estimates, at the project proposal stage, a reduction in scoring for Restoration Capability may be appropriate.

- 10) *Documentation for the logic and rationale used for model development should be described. Documentation as to how criteria were selected, as noted in earlier comments on ecological attributes, or weighted for scoring is needed. It is not clear if testing of the model was done to determine sensitivity or power to identify priority differences between parcels or if there are differences in scoring among groups of raters. Testing of the model on a sample group of parcels, perhaps using past acquisitions could provide insights into the model. Given the key role in parcel rankings generated by the model, further efforts to refine and test the model are important.*

This issue has been partially addressed in the revised proposal. Logic and rationale for model development and the selection of criteria are not fully discussed. The explanation that “criteria were originally developed through a collaborative group process” is not very informative. Some testing of the current model was done and did provide some insights into scoring. It does not appear that any testing has been done using alternate sets of criteria or different mixes of scores for the existing criteria. The stated commitment to evaluate and refine the criteria is very important.

11) It is stated that each project will be assigned a ranking using all of the adopted criteria and that the numerical scores will be used to prioritize the full proposals. However, there seems to be important information that should influence project priorities, contained in the section Program Objectives and Mandatory Requirements, items 1a through c and 2f. Additionally, it seems that when total scores are the same or close to each other, general discussion of unranked factors including cost sharing, partnerships, role in connecting or adding to other protected habitats would be useful in development of final rankings. The statement that “in making recommendations to BPA, ODFW will address each project as a whole and will review and prioritize each project in its entirety.” What this means and how it relates to the ranking of projects using the selection criteria is unclear. Clarification of this statement would be useful.

The response states that recommendations may take into account documented unranked factors. If there is disagreement about whether a project meets mitigation objectives then project proponents may submit the project to BPA anyway.

Other Comments

There is no resolution on the development or acquisition of a program database and data management system. The need for resolution is acknowledged and some alternatives for resolution are discussed, but a plan and time line for ensuring completion in a timely fashion is needed. Given its importance to program success, and given that this program is ongoing, the database and data management issue needs attention and schedule development to ensure timely resolution.

P32-33 – Federal Partners. There is no mention of coordination and/or involvement with the Federal land management agencies (FS and BLM). Coordination is necessary when implementing a wildlife and aquatic habitat mitigation program at the ecosystem/landscape scales. Although federal lands are concentrated at mid and high elevations, there is a relatively large total acreage and both agencies have long-term habitat protection and restoration programs and are also active in land exchange/acquisition programs.