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March 8, 2004

DECISION MEMORANDUM

TO: Council Members

FROM: Lynn Palensky and John Ogan

SUBJECT: Proposed release of four subbasin plan recommendations as draft amendments to the Council's Fish and Wildlife Program, for public review and comment

ACTION RECOMMENDED:

The staff recommends that the Council vote to release for public review and comment a third set (also referred to as the "red track" subbasins) of four subbasin plan recommendations as draft amendments to the Council's fish and wildlife program. The subbasin plan recommendations proposed for release as draft amendments are for the following subbasins:

- Grande Ronde
- Three Upper Snake subbasins -- Upper, Closed and Headwaters

The four subbasin plan recommendations can be reviewed in their entirety on the website, at <http://www.nwcouncil.org/fw/subbasinplanning/>. To be precise, it is the management plan portion of the recommended plans -- containing the goals, objectives and strategies -- that the staff proposes to the Council as draft amendments to the fish and wildlife program. The staff proposes that the portions of the subbasin plans supporting the management plans -- the technical assessments and inventories -- be considered to be part of a supporting appendix to the subbasin plan amendments.

The Council should also direct the staff to provide notice to the public of the availability of these draft amendments and of the public's opportunity to submit comment on them through April 22. A schedule for public hearings on these draft amendments is also recommended. Attached to this memorandum as Attachment A is proposed adoption and hearings schedule for the Tier 3 draft subbasin plan amendments.

This memorandum describes the:

- background to the subbasin planning process;
- subbasin plan recommendations proposed for release as draft amendments;

- steps that were taken in a “response loop” to address and remedy the issues and deficiencies adoptability criteria, using staff reviews and public comment (including the independent scientists’ report), and
- next steps in the amendment process.

Issues related to the adequacy of Tier 3 recommended subbasin plans

The Power Act and the 2000 Program outline the fundamental requirements that a subbasin plan recommendations must meet to be considered for adoption into the fish and wildlife program. The staff reviewed the subbasin plan recommendations and the comments on the recommendation, including the independent scientists’ reports, to assess whether the plans meant these foundational requirements, aided in this review by a set of questions that the staff developed to help apply the act and program standards. The staff outlined the key issues with the recommended subbasin plans arising out of this review in the staff memorandum provided and discussed at the Council’s September meeting in Seattle. That memorandum is attached here as Attachment C. We summarize those issues again below:

1. **Linkage.** What we called the “linkage” issue, that is, problems with the linkage (or a lack of linkage) between the limiting factors identified in the assessments and the objectives and strategies proposed in the management plans -- essentially what the independent science reviewers have called the “logic-path.”
2. **Artificial production strategy integration.** Artificial production strategies in or affecting the subbasin but not sufficiently defined, or not integrated with other elements of the subbasin plan.
3. **Monitoring and evaluation.** Inadequate or incomplete provisions for monitoring and evaluation.
4. **Assessments.** A few assessments were not sufficiently developed to guide and inform the development of a management plan that conforms to the requirements of the Power Act and program.
5. **Mainstem habitat.** Mainstem reach plans focused on habitat in small tributaries, not on habitat in the mainstem itself.
6. **Terrestrial/wildlife element.** On the whole, the terrestrial/wildlife elements of the recommended plans were weaker and less developed than the aquatic/riparian elements, with obvious exceptions.
7. **Bull trout.** The U.S. Fish and Wildlife Service in particular commented that subbasin plans should better assimilate specific provisions of its Draft Bull Trout Recovery Plan.

The four plans before the Council for adoption as draft amendments today, in staff’s opinion, had deficiencies related to one or more of the issues significant enough to prevent them from moving to the draft amendment stage in the first group of plans -- the “green” group of plans adopted as final amendments in December. Council was also of the opinion that the red track subbasins needed substantially more time than the “blue track” subbasins had to resolve deficiencies; therefore, Council allowed the red track subbasins until the end of 2004 to revise plans. Specifically, the four subbasin plan recommendations in this second group tended to have some deficiency in its assessment, in making “linkages” from the assessment to the management plan.

A “Response Loop” was used to correct the deficiencies identified by staff

After the staff review of the plans, and its consideration of the public and independent scientists’ report, the staff drafted a memorandum specific to each subbasin noting the particular

deficiencies or issues, and then also drafted proposed remedies (the staff called these documents the “Section II write-ups”). The first questions that we investigated was whether or not the planning groups would be willing to address the problems identified by staff, and if so, could they develop a revised plan. The staff worked through the subbasin planning coordinators to answer these questions. In each case, the answer was that the planners would like to revise the plans to address the deficiencies. Council approved a response period through the end of the Master Contract period of December 31, 2004, which allowed us to maintain the adoption schedule. The staff used the subbasin specific memoranda to develop detailed, task-based statements of work, and the coordinators and planners developed proposed budgets against those statements.

Revised plans were submitted for the plans that were in the red track. The central and state staff, with the assistance of the state coordinators reviewed the revised plans against the statements of work. The general conclusion is that the responses were very high quality, addressing the deficiencies noted in the original reviews, and significantly enhancing the subbasin plans that they relate to. The staff opinion is that each of the four subbasin plans that had deficiencies as originally submitted are now ready to be adopted as drafts and receive public comment with the supplemental material added.

Conclusion and recommendation for third set of subbasin plans

We recommend that the Council release this third group of four plan recommendations as draft amendments to the fish and wildlife program, provide notice of that action, and seek public comment on these drafts through April 22, 2005.

Attachments

Attachment A - Tier 3 (Red) Plan Amendment Steps and Hearing Schedule

Attachment B - Summary of Subbasin Plan Amendment Steps to Date

Attachment C - Staff Memo from September Council Meeting re: Review of May 28
Recommendations, Public Comment and Issue Identification and Treatment

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Proposed Hearings Schedule Track 3 (“Red”) subbasin plans

Release for public comment:
Wednesday, March 16, 2005

First hearing:
La Grande, (TBD - Week of March 28) (Grande Ronde)

Second hearing:
Clarkston, Wednesday, April 20 (Grande Ronde, John Day)

Third hearing:
Pocatello, Thursday, April 21 (Upper Snake Subbasins - Upper, Closed, and Headwaters, John Day, Grande Ronde)

Fourth hearing:
Helena Council Office (TBD- week of April 18) - (any subbasin)

Fifth hearing:
John Day - TBD - Early May

Sixth hearing:
Location TBD - Early May

Release as Draft Amendment and open Public Comment
John Day Subbasin - **April 13**

Close of comments for Grande Ronde and Upper Snake Subbasins:
Close of business **Friday, April 22**

Close of comments for John Day:
Close of business **May 20**

Council meeting (decision to adopt):
May Meeting (Upper Snake and Grande Ronde)

Council meeting (decision to adopt):
Late May or June Meeting (John Day)

Background on the subbasin planning process to date and next steps

This bulk of this background material has been presented to the Council the materials over the last several Council meetings and is provided here again for review.

The 2000 Program called for a complete restructuring of the fish and wildlife program through a framework of vision, objectives and strategies at different geographic scales (basinwide, ecological province, subbasin), tied together with a consistent scientific foundation. In the 2000 Program Council also adopted basinwide provisions, and described how it would add more specific objectives and measures at the subbasin and province levels and committed to future amendment processes to develop program provisions at those levels.

- Although the 2000 Program suggested that the province scale provisions would be developed next, the Council deferred an amendment process for province level measures in light of advice that province goals and objectives would be difficult to develop without first obtaining a better understanding of the technical assessments and corresponding objectives at the subbasin level.
- On August 12, 2002, the Council broadly distributed a request for recommendations for amendments to the program at the subbasin level. The Council notified in writing the relevant fish and wildlife agencies and tribes and others that the Council sought recommendations for subbasin plans or subbasin plan elements as described in the 2000 Program.
- At the same time, the Council worked with a broad range of interests in the region and developed a non-binding Technical Guide for Subbasin Planners to help ensure that plans had a consistent format and content.
- The Council worked with Bonneville to secure funding support for planning groups. This is the first time that funding has been made available to the public to help develop proposed fish and wildlife program amendments. \$15.2 million was made available by Bonneville to help planning groups develop subbasin plan recommendations that could be considered for amendments to the fish and wildlife program.
- On May 28, 2004, the Council received recommendations for 59 subbasin plans from the various subbasin planning entities. The Council made those recommendations available for public review and comment, including review by a team of independent scientists.
- The public comment period ended on August 12, 2004. The Council received an extensive set of comments, including the independent scientists' reports.
- The Council staff also conducted its own review of the plans during the comment period, for consistency with the standards in the Northwest Power Act for program amendments and with the provisions in the 2000 Program.
- In late August, the Council staff considered the plans and public comment against a consistent set of standards derived from the Act and 2000 Program, and made provisional recommendations for the treatment of each plan as a proposed fish and wildlife program amendment. As one result of this review, the staff proposed, and the Council provisionally accepted, to divide the subbasin plan recommendations into three categories or tracks, with a different schedule for considering draft and then final program amendments for each category or track. In a memorandum to the Council dated August 31, 2004, for the Council's September meeting in Seattle, the staff explained how and

why it recommended dividing the recommendations into three tracks. A copy of that memorandum is attached as Attachment B to this memorandum.

- On September 22, the Council approved the development of 11 contracts for additional work on the Tier 2 subbasins (blue) that would be completed by November 26th.
- On October 13, 2004, the Council released the first set of 29 subbasin plan recommendations as draft amendments to the fish and wildlife program, and issued public notice of opportunity to comment on those plans. The comment period concluded on November 22nd. The Council also released an issue paper seeking public comment on broader issues related to the process of subbasin planning, past and future, and received written comment through November 22nd. The Council also conducted public hearings in all four states to receive comment on the draft amendments.
- Council staff and the Council evaluated all of the public comment submitted through November 22nd testimony offered at the public hearings on Track I subbasin plans, and the views and information gathered in a variety of meetings and consultations.
- On December 1st through the 6th the Council staff conducted its review of the Tier 2 revised plans and supplements that were submitted on November 26th.
- On December 15, the Council adopted 23 subbasin plan recommendations (the Management Plan portions) into its fish and wildlife program. Six subbasin plans in the Lower Columbia which had been revised since the time they were released as drafts were not adopted because it was deemed appropriate to allow for another round of public review and comment in light of the revisions.
- On December 22, the Council released the second set of 29 subbasin plan recommendations as draft amendments to the fish and wildlife program, and issued public notice of opportunity to comment on those plans. The comment period concluded on January 31, 2005.
- On February 16, the Council adopted a second set of subbasin plan recommendations (the Management Plan portions) into its fish and wildlife program. Twenty-five subbasins plans (including the six Lower Columbia plans) were adopted and four proposed for adoption were delayed one month to allow additional local review.
- The four delayed subbasins will be in front of the Council for adoption decision at the March meeting.
- Four of the track three or “red track” subbasins will be in front of the Council for decision to adopt as Draft Amendments into the Fish and Wildlife program at the March meeting.

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August 31, 2004

MEMORANDUM

TO: Council Members and Fish and Wildlife Committee

FROM: Legal and Fish and Wildlife Divisions

SUBJECT: Description of the staff review of public comment on proposed subbasin plans; staff recommendations for treatment of issues presented in public comment; and proposed schedule for adopting proposed plans into the Program.

ACTION REQUESTED: The Legal and Fish and Wildlife divisions ask that the Council confirm and support the staff recommended treatment of issues identified in public comment and a three track subbasin plan amendment schedule.

Introduction

On May 28, the Council received proposed subbasin plans for 59 subbasins of the Columbia basin, submitted to the Council as recommendations for amendments to the Council's 2000 Fish and Wildlife Program (Program). In the first week of June, the Council released these proposed subbasin plan recommendations for public review and comment, including review and comment by an independent scientific panel made up of members of the Independent Scientific Review Panel and Independent Scientific Advisory Board. The Council received the comments on the recommendations by August 12. Individual Council staff members also reviewed the proposed subbasin plans for consistency with various elements of the Program.

The Council's staff spent the week of August 13-20 reviewing and discussing the proposed subbasin plans and the comments, and evaluating them relative to the amendment standards of the NW Power Act and Program. Because the public comments make points and raise issues in the hundreds if not the thousands, from claims of significant substantive deficiencies to suggested editorial changes, that evaluation required that the staff organize issues into manageable categories and decide (in a provisional sense, recognizing that the Council will make

the final decision) which seem sufficiently serious to bar adoption of a plan into the program at this time, and which may be treated in other ways and are not a bar to adoption. This memo explains the results of the staff's evaluation.

On the basis of the evaluation described below, the staff recommends placing proposed subbasin plan recommendations into one of three tracks. A proposed schedule for completing work in the three tracks is attached.

Track 1: Plans that have no issues that would prevent their being adopted as amendments to the program are in the first track. This does not mean that these plans are free of substantive issues, just that what issues do exist would be more effectively addressed outside of the subbasin planning groups (local, state, and regional) structure that was used through May 28th. The plans in this category are, however, fundamentally sound and ready to serve their primary purpose -- to guide Program funding/implementation processes. The next step will be for the Council staff to package these proposed plans as draft program amendments to circulate for public review prior to program adoption. At this point, the only type of work that we believe plans in this group may be asked to address in the response period is editorial/clean-up

Track 2: The second track is for plans that need significant substantive improvement within the management plan component (the objectives and strategies) that must be addressed before the plan would meet the standards for adoption into the program. The severity of the problems varies widely, but the plans in this track generally have adequate assessments, and thus, an adequate foundation for the needed revision of the management plan. For the plans in this track, the staff estimates that the time and effort necessary to make the necessary improvements is manageable within our existing schedule. We believe it would take no more than 12 weeks, and in many cases less, to bring these plans to an adoptable state. We would seek to rely primarily on the subbasin planning groups we have in place to make these improvements. After the Council receives the response/improvements from the subbasin planners, the next step will be to review those and shape the revised plans into proposed draft program amendments.

Track 3: The third track is for those few plans that are incomplete or inadequate in both assessment and management plan, and require substantially more planning effort to develop a plan that meets the adoptability standards and that can be used to guide funding and implementation processes. Staff will propose particularized guidance and schedules for completing these plans and moving toward program adoption that will likely occur outside of our existing adoption schedule.

Issues

The staff found that most of the significant substantive issues that bear upon the adoptability of plans can be grouped into a handful of broad categories. These issues cut across or are found alike in many of the proposed plans, and could be treated similarly. Four broad issues predominate:

1. **Linkage.** What we called the “linkage” issue, that is, problems with the linkage (or a lack of linkage) between the limiting factors identified in the assessments and the strategies proposed in the management plans -- essentially what the independent science reviewers have called the “logic-path”. Comments or concerns about a lack of prioritization of strategies were a sub-category of the linkage problem, in that the prioritization problem identified could often be traced back to a weakness in making explicit links as to how proposed strategies would address key limiting factors.
2. **Artificial production strategy integration.** Artificial production strategies in or affecting the subbasin but not sufficiently defined, or not integrated with other elements of the subbasin plan.
3. **Monitoring and evaluation.** Inadequate or incomplete provisions for monitoring and evaluation.
4. **Assessments.** Assessments that are not sufficiently developed to guide and inform the development of a management plan that conforms to the requirements of the NW Power Act and Program.

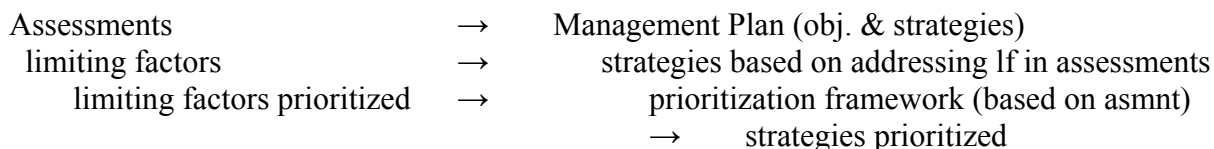
The following issues, as we assess them based on the record to date, do not bear upon adoptability of the plans, but are, nonetheless, significant. We identify them here so that the Council and public understands that we need to address these matters as we move forward in the amendment process or in future planning efforts.

5. **Mainstem habitat.** Mainstem reach plans focused on habitat in small tributaries, not on habitat in the mainstem itself.
6. **Terrestrial/wildlife element.** On the whole, the terrestrial/wildlife elements of the plans were weaker and less developed than the aquatic/riparian elements, with obvious exceptions.
7. **USFWS comments on Bull Trout.** The U.S. Fish and Wildlife Service comments illustrate that, in several plans, it desired more direct assimilation of specific provisions of its Draft Bull Trout Recovery Plan into subbasin plans.
8. **Organization.** Problems of organization, writing, length, formatting, attachments, etc. are on occasion a hindrance to understanding and reviewing a plan.
9. **Process.** A number of the comments, especially from the tribes, include concerns about the meaning of the subbasin plan process for the program and questions about additional planning or implementation planning needs.

Treatment of Issues

Once grouped into broad categories, the staff then found that recommended responses to these issues could be similarly grouped, even as each subbasin plan presents different specific permutations of these broader issues. Some of the treatments recommended require further work by the subbasin planners, and some we propose to handle in a different way. Each issue is addressed in turn:

1. Assessment/management plan “linkage” issue. Perhaps the key concept in calling for subbasin plans consistent with the Program framework was that the objectives and strategies in the plans would be driven by the biological problems identified first in the technical assessments. So the central question asked of every plan has been whether the objectives and strategies in the management plan have been linked to -- based in and driven by -- the biological problems and limiting factors identified in technically adequate assessments? A schematic that illustrates this concept is:



Within this framework, the science review comments and the staff review identified three different versions of the linkage problem:

- (1) *An assessment that is so inadequate or incomplete as to fail as the basis for a management plan.* A major defect, but fortunately we have few plans in this category -- on the whole the assessments appear to be adequate as a basis for planning, a major accomplishment of the process. For those few plans with an assessment at this level of inadequacy, the staff will work with the Council to frame a specific schedule and approach to completing the assessment and then adding the management plan component based on the completed assessment.
- (2) *The assessment is adequate to be the basis for planning, but the objectives and strategies -- especially the strategies -- are not clearly linked and responding to the limiting factors in the assessment.* Also a serious matter -- the primary linkage defect -- although easier to remedy than if the assessment itself is inadequate. There are a number of plans in this category. This is the primary reason we propose returning plans to the subbasin planners during the response period for correction. There are several reasons that plans ended up in this situation, ranging from the fact that the planners tried but failed to provide the correct linkage (e.g., the strategies ended up just too broad or general), to planners who simply ran out of time to relate the management plan effort closely to the assessment. Whatever the reason, the staff recommends that the relevant planners be asked to strengthen these links before the Council tries to adopt these subbasin plans as draft program amendments. As we turn this task back to the subbasin planners, we have some

specific guidance on how this work should be organized so that the plans will meet the adoptability standards:

Proposed response for the “Linkage” Issues described above

Planners should produce a short supplement to the existing management plan, not more than 20 pages, explaining: (1) the key factors limiting biological potential of the selected focal species in the subbasin (referencing the existing assessment); (2) which limiting factors are of priority to address first (if possible, and again referencing the existing assessment); (3) a description of the objectives and strategies, with an explanation and direct link as to how particular strategies address the limiting factors identified; and (4) either a prioritizing of the strategies (related to the priority limiting factors) or a description of a “prioritization framework,” i.e., the criteria/considerations and procedures that would be used to develop and prioritize proposed actions in future project selection processes consistent with the assessment and linked strategies. Responding to this issue in this fashion -- rather than trying to revise or edit or replace the original management plan -- should make for a more manageable effort and user-friendlier plan.

In an ideal plan, biological objectives in the management plan should be linked to and derived from the limiting factors in the assessment, serving the purpose of describing *how much* change in a limiting factor or biological response is sought. The strategies then, are the “things to do” that eliminate or mitigate the limiting factors until the amount of change called for in the biological objective is obtained. Planners that can provide this level of integration and completion are encouraged to do so. But at this point, however, the staff recommends that the focus be on the strategies -- “things to do”, and on grounding the strategies in the assessments, even if this means the biological objectives -- “how much to do” -- remain largely implicit in the linkage.

- (3) *The assessment is adequate, as is the basic linkage of strategies to the assessment, but the strategies are not prioritized, or are incompletely prioritized, or the prioritization is criticized as inadequate.* If a plan lacked an explicit prioritization of strategies, but was otherwise sufficient in demonstrating how strategies linked to limiting factors in the assessments, the staff did **not** recommend that the plan be returned to the subbasin planners for further work *solely* on prioritization. This is because that type of additional detail can be prepared at time of first implementation. That is, as part of the project solicitation and recommendation process, the Council can require that a “prioritization framework,” for the plan be provided as part of the justification for the projects proposed for Bonneville funding. That framework could be a statement of principles/criteria explaining how the proposed projects implement the highest priority strategies that are related to limiting factors in the assessments

As stated above, we do not treat the lack of an explicit prioritization or framework for prioritization as a bar to adoption into the program. Because of this, we will not generally use the response period to work further on prioritization. However, if where the staff recommends that a subbasin plan return to the subbasin planners or work on some *other* issue -- such as an assessment/strategies linkage problem or a failure to integrate artificial production adequately -- the planners should also respond to comments

indicating a lack of prioritization by adding a “prioritization framework” to the plan as described above. Taking the next step to actually prioritize the strategies may be desirable but is not necessary at this time.

2. Artificial production strategy.

The comments and staff review indicate that many of the plans failed to account for artificial production in and affecting their subbasins as completely as anticipated by the Program and the Technical Guide. Many plans that include artificial production strategies did not fully describe how that strategy was integrated with habitat related strategies to meet integrated biological objectives for a focal species. Similarly, often plans did not clearly describe the artificial production strategy within the ecological context of the subbasin.

There are a number of reasons that we believe that the planners were unable to complete this work, the least of which is not the lack of information forthcoming from federal recovery planning and hatchery-planning processes as expected. There are also ongoing legal proceedings where these issues are being discussed, and in some cases, it appears that planners decided that the decisions in those proceedings needed to be made before further detail could be put into plans. In light of those challenges, as well as others, the staff does not recommend returning the plans to the planning groups to do more work on this element. In fact, the staff recommends that the primary treatment for this problem flow from the Artificial Production Review and Evaluation (APRE) and related initiatives outside of subbasin planning, as described below. Improvements will be integrated back into the subbasin plans at a later date. There are limited exceptions to this recommendation where we do believe additional planning work in the response period could be made in conjunction with other improvements.

Subbasin plans can be divided into different categories depending on the nature, location and role of artificial production. All types share in the problems identified above, but the distinctions help sort out which plans need further work on this issue and which do not. In descending order of criticality, the different categories are as follows:

- (1) In some subbasins, artificial production is a central population rebuilding strategy in the Council’s current program, in conjunction with habitat improvements, and thus a central strategy in the proposed subbasin plan. But, in some of these subbasin plans one of the two following situations exists:
 - a. The artificial production strategy is presented as a “stands alone” strategy, with little or no integration into the habitat or natural production strategies, or into the assessments and objectives, even though artificial production is intended to help rebuild naturally spawning runs. The staff concluded that this was one situation in which the lack of adequate treatment of artificial production presented a problem of sufficient magnitude so as to prevent adoption of the plan into the program, not a defect for which treatment could be deferred to other processes.

In this situation planners will be asked to remedy this in the response time, through an adequate discussion of the role of artificial production in the assessment, objectives

- and strategies, including how artificial and natural production are linked in the habitat objectives and strategies. Rather than amend the original management plan or assessment, planners should instead produce a short supplement to the management plan, not more than 20 pages, for this purpose.
- b. The role of this artificial production strategy is relatively well described and integrated into the plan's habitat/natural production strategies, but only in a qualitative or narrative sense, without quantified objectives or a sophisticated analysis of the ecological context. A number of plans fall into this category. The staff recommends *not* asking the subbasin planners to further refine the expression of artificial production strategies in the plan, at least not for this reason alone. If the planners are being asked to address a linkage problem as described above, they should consider what further refinements they can make in the treatment and integration of artificial production in the same management plan supplement. Otherwise, the staff recommends addressing this problem in the APRE and other forums, as described in more detail at the end of this section.
- (2) In other cases, artificial production exists in the subbasin -- or exists out of the subbasin but nearby and its effects are strongly felt in the subbasins -- but artificial production in the subbasin is not a central strategy of *this* program or the proposed subbasin plan. In some such subbasins, one of the two following situations exists:
- a. The proposed subbasin plan includes little discussion of the role and effects of artificial production, in the assessment or the management plan or both. In some cases, this is a significant problem in understanding the viability of and effects on natural production/habitat objectives and strategies. The staff recommends *not* asking the subbasin planners to further refine the expression of artificial production strategies in the plan, at least not for this reason alone. However, if the planners are being asked to address a linkage problem that is needed to adopt the plan as described above, they should consider what further refinements they can make in the treatment and integration of artificial production in the same management plan supplement. The APRE and other processes will take these matters the next step, as described at the end of this section.
 - b. The subbasin plan recognizes the existence and effects of artificial production in the subbasin, especially in the assessment, but the next step of incorporating or evaluating those effects as in the objectives and strategies for the subbasin has not been done. Again, the staff recommends *not* asking the subbasin planners to further refine the expression of artificial production in the plan, at least not for this reason alone. If the planners are being asked to address a linkage problem as described above, they should consider what further refinements they can make in the treatment and integration of artificial production in the same management plan supplement. Otherwise, the staff recommends addressing this problem in the APRE and other forums, as described in more detail at the end of this section.

Staff Recommendation: In a nutshell, the discussion above states that for artificial production activities to be adequately addressed in subbasin plans:

- Hatchery production must be aligned with natural fish production, existing subbasin habitat and future habitat restoration efforts.
- Hatchery production should be integrated with natural fish production with the aim of lessening negative ecological interactions and mixed-stock harvest impacts.
- Subbasin plans should clearly articulate measurable objectives for hatchery escapement, natural returns and harvest needs.

The staff believes that the APRE process may be the best vehicle to make advancements on these questions, rather than returning to the subbasin planning groups that struggled with this component. Future APRE work will assist subbasin planning by better integrating artificial production with local conditions. As part of a process to clarify basinwide artificial production objectives, we anticipate that the APRE process will include a series of provincial meetings with hatchery operators and harvest managers to clarify harvest and production objectives. In those meetings, we will work with the assessment information from subbasin plans and production, harvest and recovery goals described in other plans, to attempt to ensure that hatchery production, habitat conditions and restoration efforts, and natural population status is accounted for and integrated. In general, participants in the APRE exercise will be supplied the information on habitat conditions, hatchery restoration/protection strategies, and natural population status from subbasin plans and be asked to determine the appropriate role hatchery production in the subbasin.

From the APRE activities described above we will move next to attempt to articulate numeric objectives for hatchery returns, natural escapement and harvest needs in and out of the subbasin. These numeric subbasin objectives can then be aggregated into provincial objectives and provincial objectives into basinwide objectives. The products from these workshops will likely inform future iterations of subbasin plans.

The APRE will work with NOAA Fisheries and U.S. Fish and Wildlife Service to coordinate with ongoing NEPA and ESA processes. While much of the basin's hatchery production should be better incorporated into subbasin activities, it may not be possible to resolve all hatchery production issues due to existing mitigation or legal agreements. If conflicts exist, they will be noted and discussed in other venues.

3. Research, Monitoring and Evaluation.

The ISRP found that adequate RME sections were lacking in nearly all subbasin plans. A key challenge is how to evaluate resource management efforts at different scales in a way that is scientifically defensible and ecologically meaningful e.g., how to link monitoring efforts at the watershed or subbasin scale with efforts at the larger scale of evolutionarily significant units.

Staff Recommendation: To address RME needs for the Columbia River Basin in any practical sense requires a shift from work at the project scale to a programmatic approach. Individual subbasin cannot be expected to have or hire the specialized expertise, secure long range funding

commitments, or command the ability to mount and sustain long-term RME efforts. Yet because the issues of interest to subbasin planners in RME are also of interest to entities with responsibilities over a broader geographic scale, it is possible for efforts at the smaller scale to benefit from the overlay of efforts at a broader scale. Therefore, rather than try to design a complete and comprehensive monitoring program in each subbasin, which it probably cannot afford, the region should identify and develop consensus about how much and what type of monitoring is needed and can be afforded for managing an effective Fish and Wildlife program. Further, all opportunities to conduct collaborative research should be fully exercised.

Consequently, staff recommends that Council support the efforts of the Pacific Northwest Aquatic monitoring Program (PNAMP) to develop a regional approach to monitoring. PNAMP is a voluntary, non-directive, self-organizing forum committed to developing a unified approach to monitoring in the Pacific Northwest. PNAMP provides a forum for collaboration of the members as they work towards developing a coordinated approach to monitoring by providing a durable structure for facilitating the development of cross-party linkages. Ratification by PNAMP of products that will encourage continuity in disparate monitoring efforts is a key objective. Professional courtesy and respect for overlapping but different mandates is an essential ingredient for the successful negotiation of a regional approach to monitoring in the Pacific Northwest.

At the request of the Council, PNAMP previously developed guidance to help subbasin planners design the monitoring elements of the subbasin plans. The guidance document provided general and some specific considerations to the Council and subbasin planners on how their monitoring can fit within the broad range of monitoring activities in the Pacific Northwest. PNAMP offered this initial guidance for monitoring efforts at the subbasin level as a step to encourage the coordination of local, tribal, state and federal programs.

In regards to funding through a future project selection process, Council staff has communicated to PNAMP that the Council will likely prioritize monitoring work at a programmatic scale that will have clear benefits to the Fish and Wildlife Program in general and subbasin planning in particular. In conclusion, the area of RME presents the Council with a clear opportunity to provide leadership to the region on issues that are central to the success of the Fish and Wildlife Program.

”Other issues”

Although they are not issues that, as we understand and evaluate them based on the record in hand to date, do not impede the ability to adopt a plan, issues numbered (5) through (9) earlier in this memorandum were deemed important enough to highlight. The staff recommends that if a subbasin plan is being worked on during the response period to address a matter that does affect adoptability (e.g. one of the “linkage” issues identified above) then the planners consider if they can respond to any of these “other” issues if and where they apply to their plan.