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August 8, 2017

MEMORANDUM

TO: Fish and Wildlife Committee Members

FROM: Staff

SUBJECT: Discussion of Wildlife Project Review policy and programmatic issues

PROPOSED ACTION: Fish and Wildlife Committee consider and discuss particular staff recommendations on the wildlife category review and key policy issues

SIGNIFICANCE: Discussion of key policy issues (from the Program) and possible responses to the ISRPs programmatic issues will help inform: staff recommendation on the wildlife projects review, a path forward on outstanding crediting issues, as well as the next Program amendment process

BACKGROUND

The last wildlife category review took place in 2009, with funding recommendations covering FY 2010-2014. Most wildlife projects are implemented over a long time period and have been reviewed several times. The 2017 review focused on results, management challenges, and maintenance. Rather than reviewing project *proposals*, the review relied on a project results summary, management plans and annual reports.

The 2017 Wildlife Category Review launched in December 2016, with the review information packet shared with sponsors of 29 wildlife projects. The information packet included background, schedule, and instructions for the review. All review

materials were due from sponsors on March 23, 2017 for ISRP and Council review. The Council held a two-day meeting with ISRP and sponsors for project presentations and discussion time for programmatic wildlife issues. The preliminary ISRP report was completed on May 10, and responses from 10 projects were requested. Public comment on the ISRP reports began May 11, at the completion of the Preliminary Report. The ISRP Final Report was complete on June 28 and public comment closed July 27. Staff recommendations will be presented to the Fish and Wildlife Committee at the September Council meeting. Staff anticipate presenting the Fish and Wildlife Committee recommendations to the Council at their October meeting. All background information on the 2017 review process details (schedule, criteria, and process) can be found in Attachment 1 and linked [here](#). The full Final [ISRP Wildlife Review](#) report can be found on the Council's website.

Policy Discussion Issues

Below are three key policy issues, background for discussion, and the list of programmatic issues raised by the ISRP.

The three policy issues that staff would like to discuss with members are:

1. M&E species response to habitat for wildlife
2. Complete mitigation agreements for remaining construction and inundation (C&I) losses by 2016 at 2:1.
3. Complete operational loss assessments

To help with the discussion of losses and crediting, staff developed a table of losses and credits for both construction and inundation and operational losses. This information came from existing, available information on [Cbfish.org](#) supplemented by HEP reports. Staff will continue to work on this accounting table and will have it available for the discussion with the Committee at the August meeting.

Key Policy Issues:

1. Monitor and evaluate species response to habitat

The issue around monitoring and evaluating (M&E) wildlife species' response to habitat actions is not new. In the last two reviews, the ISRP viewed the limited amount of work being done on monitoring within the wildlife program as a deficiency. However, in the current review the ISRP notes that all 29 are engaged in some level of monitoring.

The 2014 Program's strategy for wildlife "encourages wildlife agencies and tribes to monitor and evaluate habitat and species responses to mitigation actions and develop a more standardized approach to wildlife monitoring." General Program requirements for adaptive management call for monitoring to assess if a project's objectives (biological or otherwise) are being achieved.

In the FY 2007-2009 project review recommendations, most project budgets were limited to a 5-percent soft cap for project monitoring. The ISRP notes that monitoring support is inconsistently applied and inefficient, and supports a more

coordinated, regional approach. The funding level cap limits, and was intended to limit, monitoring to just compliance activities. Some projects use non-BPA funds to conduct M&E, but others have been unable to secure non-BPA resources. The outcome is large variability in the information available to evaluate progress and the likelihood that projects will be unable to fulfill the ISRP concern for habitat and species monitoring.

However, wildlife mitigation differs from other habitat mitigation in that land is purchased to replace the habitat once exposed and now inundated by the construction of the dams. Once that land is purchased the obligation is subject to operation and maintenance funding to support the continuance of those habitat units which were the basis for mitigation.

Related in this discussion is the ISRP programmatic issues on adaptive management and measureable objectives. Staff recommend that all sponsors develop measureable, task-based or biological based objectives within their management plans. These monitoring activities should tie directly back to measurable, quantifiable objectives in the management plan. Some sponsors augment limited Program monitoring dollars with funding from other sources for monitoring activities. However, the ISRP continues to hold the opinion that sponsors should be engaged in a robust monitoring program to assess target species.

Two potential solutions exist:

- 1) If the Council believes that habitat and species response monitoring are necessary to fulfill the strategies in the program (i.e. monitor species response), it should recommend that Bonneville increase the level of funding for monitoring wildlife projects to an amount appropriate for compliance and species-level monitoring.
- 2) To meet general program requirements for monitoring to assess if objectives are being achieved, wildlife projects sponsors continue to use the allocated 5-percent of their budgets to track progress in accomplishing quantifiable objectives in management plans. In this case, sponsors are not expected to conduct species-response monitoring (gather, and evaluate data for assessing species response to their mitigation actions).

Either way, through Program funding, the Council expects wildlife sponsors to conduct compliance monitoring, at a minimum.

A regional RM&E approach: Since the 2009 review the Upper Columbia United Tribes have made progress by developing a standardized approach called the UCUT Wildlife Monitoring and Evaluation Program (UWMEP). That project was highlighted during this 2017 review as an approach that could be applied to other areas of the basin. The Council supports efforts of the managers to pool resources to implement a regional RM&E framework for wildlife projects.

Draft Recommendation:

- 1) If habitat actions are taking place to affect focal species populations or behavior, the sponsor should develop measurable objectives toward that goal.
- 2) Develop basic monitoring plan for Bonneville funding within the 5-percent budget.
- 3) Encourage managers to explore pooling resources for a regional RM&E framework.

2. Complete loss mitigation agreements for remaining construction and inundation (C&I) losses by 2016 at 2:1.

The 2014 Program language calls for:

- *Bonneville and the fish and wildlife agencies and tribes will complete wildlife loss mitigation agreements for at least the remaining construction and inundation losses by 2016. In addition, for each wildlife agreement that does not already provide for long-term maintenance of the habitat, Bonneville and the applicable management agency shall propose a management plan adequate to sustain the minimum credited habitat values for the life of the project.*
- *Whenever possible, Bonneville shall work with the agencies and tribes to ensure that wildlife mitigation shall take place through long-term agreements that have clear objectives, a plan for action over time, a committed level of funding that provides a substantial likelihood of achieving and sustaining the stated wildlife mitigation objectives, and provisions to ensure effective implementation with periodic monitoring and evaluation.*

Staff is working on a compiling a list of the most current and comprehensive accounting of wildlife losses and crediting. The information for both construction and inundation and operational losses was compiled from existing sources, most of which are on cbfish.org. The list will identify the current mitigation status for each dam (see meeting handout).

Since the 2014 Program adoption, Bonneville has been negotiating with several sponsors but no additional settlements have occurred. Based on those discussions and the progress being made on what remains in Southern and Northern Idaho (Albeni Falls) and Grand Coulee Dam, the fish and wildlife agencies and tribes will continue to work on agreements to fully mitigate for construction and inundation losses.

DRAFT Recommendation:

- 1) The Council, fish and wildlife sponsors and Bonneville will work to resolve outstanding issues with Grand Coulee and the distribution of crediting across the lower Columbia dams (Bonneville, McNary, John Day, and The Dalles).
- 2) Bonneville will provide an update to the Council toward the end of each calendar year on the status of what remains for construction and inundation losses and agreement status.

Note: ahead of next amendment process it would be helpful to have a common understanding of where mitigation remains to be done and have a clear path forward from Council members as to how we fill gaps. Until then, it may be difficult

to focus on assessing operation loss assessments. and move toward mitigation for operational losses.

3. Complete operational loss assessments

The 2014 Program and past programs called for wildlife mitigation from the continued operation of the dams; particularly through negotiated agreements (see Program language below). This is different from construction and inundation losses and harder to assess. For many years wildlife managers have been divided on the level and nature of technical analysis needed to adequately characterize wildlife impacts resulting from the operation of the Federal Columbia River Power System, but agree that these impacts vary widely from hydro project to hydro project in both nature and extent. The upper river storage projects are widely believed to suffer the greatest unmitigated losses due in part to the wide range of operating levels and immediate downriver and floodplain impacts not found in the lower “run of the river” projects. However, the effects of hydropower system operations extend throughout the river, even to the estuary. The complex nature of operational and secondary impacts to wildlife makes their full quantification and characterization challenging.

The Kootenai Tribe of Idaho and Montana Fish Wildlife and Parks have developed a framework for assessing Operational Losses for Libby Dam. That work has improved our understanding of the nature of operational impacts, and consequences to wildlife habitats and populations and has been used as a tool in that area of the basin for their habitat efforts. The applicability of the Kootenai Operational Loss Assessment to other hydro facilities has not been designed and tested.

The 2014 Program calls for:

- *Where appropriate prioritization exists and agreements exist on the methodology, complete wildlife loss assessments for losses caused by operation of the hydropower projects*
- *Develop and implement habitat acquisition and enhancement projects to fully mitigate for identified losses.*
- *The need for new methods to assess operational losses that incorporate the results of ongoing pilot projects. This could include technical testing and evaluation of operational loss models and methodologies, or other alternative habitat evaluation methods.*

A methodology to assess the impacts of operational losses was developed and could be tested for applicability to other areas of the program if the need arises. Additional operational losses may be addressed through settlements agreements. The Council, Bonneville and the managers should continue working towards an agreed method of assessing operational losses and prioritize work in place in kind opportunities for mitigation.

DRAFT Recommendation: 1) The Council and Bonneville will work together on a process that will lead to an assessment of operational losses in areas that do not have settlement agreements in place by 2018, ahead of Program amendments. 2) Bonneville should continue to work on agreements to settle operations losses for projects that do not have operational loss settlement agreements. In those

agreements, prioritize opportunities for in place/in kind restoration from dam impacts and include in settlement agreements as possible.

ISRP Programmatic Issues

Below are the programmatic issues discussed by the ISRP in their final report.

Staff discuss the first and second issue (in part): A. *Need for time-specific quantifiable objectives*, and part of the second, issue B. *Monitoring and evaluation (M&E) and adaptive management; policy on funding*.

Staff are prepared to discuss draft responses to any of the remaining issues B-J at the meeting upon request.

- A. The need for time-specific, quantifiable objectives (*discussed below*)
- B. Research, monitoring, evaluation (RME)
 - a. Wildlife crediting
 - b. Monitoring and evaluation (M&E) and adaptive management
 - c. Results reporting: inconsistencies between project summaries and annual reports:
 - d. Project effectiveness M&E: policy on funding
 - e. Prospects for regional RM&E
- C. Proposal for a workshop and pilot project
- D. The ecological consequences of fragmented acquisitions
- E. Treating wildlife mitigation as an integrated program
- F. Outreach activities
- G. Weed management
- H. The need for a broader and readily available supply of native seed and locally adapted nursery stock
- I. Lead shot use on wildlife mitigation properties
- J. Improving the review process

A. The need for time-specific, quantifiable objectives

The Council and Bonneville agree with the ISRP that planning, implementation, and evaluation of Fish and Wildlife Program projects would benefit from clear statements of (1) qualitative goals in management plans that describe a project's desired long-term ecological condition, and

(2) measurable, task-based objectives that guide a project toward conditions identified in management plans and by the qualitative goals.

The goals and objectives will vary from simple to more complex based on the conservation values and goals for the land and its management. For example, some parcels require very little and infrequent management actions, while other require more frequent, on-the-ground attention and possibly even restoration actions.

Draft Recommendation: 1) Bonneville and Council staff will update the [management plan template](#) to reflect a place for clearly articulated measurable goals and objectives with time-based benchmarks by the end of calendar year 2017. 2) If not already articulated, biological objectives and measurable goals should be incorporated in management plans for every parcel or group of parcel that have associated management plans during scheduled updates or as new management plans are

developed. 3) The Council can facilitate a webinar for on how to develop measurable objectives (task-based and/or biological objectives) as part of Bonneville's management plan template. All sponsors will be invited to participate.