



COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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June 23, 2006

Mark Walker
Director of Public Affairs
Northwest Power & Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

Dear Mr. Walker:

Thank you for this opportunity to comment on the Northwest Power and Conservation Council (Council) Document 2006-7, "Columbia Basin Data Center proposal", dated May 2006. Our Commission has long supported efforts to make information needed for natural resource management more accessible to interested parties. We routinely share data and analytical expertise with state and federal agencies during annual deliberations of the Pacific Salmon Commission, the Pacific Marine Fisheries Commission, and implementation of the *U.S. v Oregon* agreements. We strongly supported the formation of a Data Sharing Committee under the Pacific Salmon Treaty. CRITFC staff provided data and other technical support to local stakeholders in Oregon during the Council's Subbasin Planning Process and is completing an archive of available watershed assessment information developed during that process.

Based upon our experience with these information sharing efforts, we agree that the problems identified in the Council's Data Center document are important and that the four functions described for the Data Center are needed for effective information management and sharing. There are, however, several additional aspects of information management and sharing which are not fully described in the Council's document, but are central to achieving our shared goals. First, the critical information needed for resource management is generated by multiple agencies and funding programs. For example, all the salmon harvest data, most of the hatchery production data, and most of the spawning escapement data are generated and managed outside of the Council's Fish and Wildlife Program. Large, important habitat data sets are also maintained by state and federal agencies separate from the Fish and Wildlife Program. Even the most sophisticated data management program will not succeed if it is applied only to the Council's activities and projects. Conversely, a collaborative approach, adopted by a wider group of agencies and programs is likely to provide larger benefits, faster, and at less cost.

Second, improving information management and sharing are multi-faceted in nature and require multi-faceted solutions. There is a duality to addressing data standards for instance. Standard data collection protocols can only be developed by biologists (or other data content specialists) knowledgeable in the subject matter and sampling logistics. On the other hand, database and data management standards can best be developed by specialists in Information Technology

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(IT). Similarly, there are unique differences between data and understanding what the data mean. Lower levels on the data pyramid are concerned with the original raw numeric data elements. Higher levels on the data pyramid are more concerned with parameters derived from the original data and with the results of various data analyses. Council members probably do not want to examine tables of water temperatures collected every 15 minutes, but they may well be interested in change in water temperature caused by habitat restoration projects, for instance. Thus it is both data and the basic tools to interpret data that must be developed and shared.

Finally, significant progress on data sharing has occurred since the ISRP report in 2000. Data needs and data gaps are being identified by the CSMEP project, the development of the CBFWA Status of the Resource reporting project, and by discussions surrounding the remand of the FCRPS Biological Opinion. Data collection and reporting standards are being addressed by the Pacific Northwest Aquatic Monitoring Partnership, the Northwest Environmental Data network, and the StreamNet and Northwest Habitat Institute projects. We are concerned that creation of a new, separate Data Center group might slow progress already underway and add to the administrative burden of coordinating information sharing.

With these concerns in mind, we offer the following recommendations to address the Council's concern for effective information sharing.

1. The Council should adopt information sharing goals for its program. The four responsibilities described for the Data Center provide a good beginning for developing a final set of goals.
2. Assign responsibility for meeting those goals to existing collaborative groups and Fish and Wildlife Program projects. For instance Information Technology responsibilities could be assigned to NED, StreamNet, and the Northwest Habitat Institute. Information content responsibilities could be assigned to CBFWA, PNAMP, and the CSMEP project. This approach would effectively leverage the Council's existing investment in information management without increasing administrative overhead.
3. Develop one or two prototype efforts in FY07 to capture data directly from BPA-funded projects into regional databases. An appropriate initial focus might be those projects which collect data on fish population status. Expand the effort to other project types in FY08-09.
4. Use the FY07-09 project selection process to incorporate specific milestones, commensurate with resources, into existing projects. Progress will be faster than by creating an entirely new entity.
5. Both the IT and data content efforts should seek the cooperation of programs and agencies outside the Fish and Wildlife Program by providing incentives ("carrots not sticks" e.g. shared tools, methods and expertise) to cooperate with and adopt practices developed for the Council's Program.
6. Plan ahead to meet future information management and sharing needs. Potential needs include: creating core reporting standards for the next round of subbasin assessments; providing technical expertise and resources to enable local stakeholders to update subbasin assessments periodically; maintaining the integrity of the information sharing

system over time as technology changes. Planning ahead is faster, cheaper, and maintains data integrity far better than reacting to needs after the fact.

7. An independent auditing function to measure progress toward the Council's goals could be provided by the ISRP, ISAB, or an independent contractor, should the Council wish.

Thank you for this opportunity to comment on an issue central to our efforts to protect and restore the Columbia Basin's fish and wildlife resources. We are very interested in contributing to this conversation as it proceeds and will work with the Council to develop and implement effective information management practices.

Yours truly,

A handwritten signature in cursive script that reads "Olney Patt, Jr.".

Olney Patt, Jr., Executive Director
Columbia River Inter-Tribal Fish Commission