FLATHEAD BASIN COMMISSION

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June 21, 2006

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

Re: Council Document 2006-7, the Columbia Basin Data Center Proposal

Dear Mr. Walker:

The Flathead Basin Commission (FBC) thanks you for the opportunity to comment on Council Document 2206-7, the Columbia Data Center Proposal.

The FBC was created in 1983 by the Montana (MT) Legislature to monitor and protect water quality and other natural resources in one of our state's most important watersheds. The FBC is a uniquely structured non-regulatory commission of twenty three members representing governments and citizens that works to accomplish its' important mandate through consensus building, stressing scientific data gathering, education, broadly-based community involvement, stakeholder partnerships and the voluntary participation of Basin residents (http://www.flatheadbasincommission.org/).

The FBC supports the Council's concept of a centrally maintained, internet based, data warehouse and distribution center.

Our support comes with some concerns, questions and comments:

- 1. We hope the Council will, prior to developing a new data center, do a detailed summary and analysis of existing computer-based, web-accessible data systems for natural resource and water-related information in the Northwest. This analysis should include an examination of the strengths and weaknesses of the existing systems including review of costs to develop, populate, launch and maintain the systems. Your cost review should include a look at which data systems are currently funded by the Council's programs and if the proposed new data center will be in competition for these funds.
- 2. We urge you to consider "transitional approaches" that protect existing data sets and will allow them to merge into the newer protocols so that we do not lose the historic value of existing data and related information;

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- 3. We encourage the Council to work collaboratively with the region in developing standardized protocols and to be sure that your regional partners such as the FBC have additional opportunities to comment on protocols as they are developed;
- 4. We wonder who will pay for the data entry and/or conversion of data for historic data sets such as ours; and for future data entry into your new centralized system. Will there be charges to access your system? And,
- 5. Do you envision funding to be available for these functions?

Since 1992 the FBC has trained, equipped and supported over 100 local volunteers who have collected thousands of water quality data on more than 36 lakes in the Basin. FBC volunteers have also monitored sites on several area streams for the past eight years, and FBC grant-funded projects have generated additional water-body specific data for local streams and rivers. Additionally, the FBC is responsible for the coordination of a basin-wide water quality monitoring plan which includes trans-boundary monitoring at the U.S.-Canadian Border on the North Fork of the Flathead River. The basin-wide plan collectively focuses the monitoring resources of several state, federal and local entities to cooperatively address comprehensive monitoring.

Data generated by these efforts include water quality, hydrologic, biologic and meta data. Cooperative partners include British Columbia, U.S. EPA, Flathead National Forest, National Park Service, MT Dept. of Natural Resources, MT Dept. of Environmental Quality, University of MT-Yellow Bay Biological Station, local conservation districts, local governments, the Confederated Salish & Kootenai Tribes, local NGO's such as the Flathead Lakers and others interested in protecting water quality in the Basin.

We believe the information being gathered in the Basin is generally of high quality and holds significant value for a wide variety of resource managers and other decision-makers. Providing this information through a web-based system such as you are proposing would be an efficient approach to serve the broad needs of local and regional interests. We understand the importance of valid and consistent data collection protocols, and for local and regional coordination to avoid duplication of efforts. Currently, we are in the process of examining our monitoring objectives and priorities.

In our local basin we face many of the same issues as the region, including trans-boundary watershed, multiple agencies and NGO's collecting data for different reasons, the need for baseline water quality data and trend analyses, funding limitations and concerns about data adequacy for statistical analyses. Thus, we support your regional efforts to address these issues through a comprehensive approach.

As you move forward with your Columbia Basin Data Center Proposal please feel free to contact us with questions about our data sets, methods and our Flathead Basin monitoring plan. Please keep us apprised of your progress, and we invite you to come and address the FBC during one of our meetings so that we might stay informed and discuss your proposal further. Thank you.

Sincerely yours,

Rich Moy, Chairman

Cc: Paul Williams, FBC Vice-Chair
Mel Lehman, FBC Executive Director
Mark Holston, FBC Public Information Officer
Julie Dalsoglio, FBC Monitoring Committee Chair
Jim Simpson, FBC Voluntary Nutrient Reduction Committee Chair
Marilyn Wood, FBC Trans-Boundary Committee Chair
Jan Metzmaker, FBC Education & Outreach Committee Chair