



Oregon

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June 21, 2006

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Chairman Tom Karier
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Chairman Karier:

The Oregon Department of Fish and Wildlife (ODFW) supports continuing regional efforts to improve the accessibility and transparency of fish and wildlife data for the Columbia River Basin. Consistent with this, we provide the following comments on your draft "*Proposal for a Columbia Basin Data Center*", and offer suggestions that we believe would establish a long-term successful regional data management strategy.

ODFW believes that a new data-related entity is not needed and would: 1) contradict Independent Scientific Review Panel recommendations against the establishment of yet another centralized data system; and 2) undermine the direction put forth in the Scientific Applications International Corporation (SAIC) report that supported using existing data management projects to build the Fish and Wildlife Program (FWP) data management system. Resources are already limited in the Basin. Spreading those resources to yet another data-related entity would minimize the effectiveness of established data management efforts, which are already moving toward or accomplishing several of the stated goals of this proposal, such as internet access and data sharing by StreamNet, Data Access in Real Time (DART) and others; the Collaborative Systemwide Monitoring & Evaluation Partnership's (CSMEP) focus on data integrity; the Pacific Northwest Aquatic Monitoring Partnership (PNAMP), CSMEP, and Northwest Environmental Data Network's efforts to identify data gaps through inventories; and the direction towards standardized protocols through all these and other efforts. ODFW supports efforts by the Council, along with the Columbia Basin Fish & Wildlife Authority (CBFWA), to direct data management in a way that progresses toward the accomplishment of the stated goals of this proposal.

ODFW agrees that an "outlet for comprehensive, high quality data" that serves all needs is "much needed." However, we believe the Columbia River Data Center, as proposed, cannot achieve this goal nor ensure "that data gaps are filled, standard data protocols are followed, and data quality is maintained." The proposal focuses on the FWP, and states that data standard protocols "would be applied to BPA funded projects." Focusing on FWP funded projects alone

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would fail to establish a comprehensive data system because it would not include the many, important non-FWP funded projects. These non-FWP funded projects provide invaluable information that contributes to the management of fish and wildlife resources in the Basin. The Data Center would have no authority to direct the focus of these projects towards data gaps, dictate that they follow data protocols, or enforce data quality standards.

The proposal also suggests a portal-based system as a strategy for “establishing an Internet-based system for the efficient dissemination of data.” However, portals rely on the accessibility of standardized electronic information, which is currently limited to some FWP data projects and a few other large-scale data collection efforts. Achieving comprehensive access to fish and wildlife data in the Basin is not likely in the near future, so focusing on output mechanisms is of little value unless impediments to getting the data ‘out there’ are resolved. Without the adequate flow and accessibility of data from data collectors, a portal would have limited information, and would continue the need for managers, researchers or the public to seek information from additional sources.

As stated earlier, ODFW believes applying standards to only BPA-funded projects would eliminate the possibility of establishing a comprehensive data system. It should also be noted that it is not possible to remain independent from the data collection process, as is stated in the proposal, and still seek to establish data collection standards. Therefore, ODFW strongly supports the idea that any establishment of standards involves the data collectors. Sampling protocols and data collection standards must have the support of those collecting the data, and must recognize that other data collection needs exist, besides those of the FWP. Dictated standards that address only FWP needs will create data gaps by failing to provide incentives for current, non-FWP-funded programs to contribute. Other standards such as reporting, data definitions, coding, etc. also need to involve the field-level data collectors, but should be led by the various data management efforts.

BPA’s Pisces system is highlighted in the proposal as an effort that “promises to provide considerable value to the regional fish and wildlife effort.” This statement may ultimately turn out to be true, but it should also be recognized that Pisces is a reporting and project tracking system that is based on a standard that was established by its creators. It serves only regional needs, was not developed collaboratively, led to unfunded new work that didn’t fit anything that was already being done, and provides little, if any benefit to the data users or data collection agencies. Given this track record, ODFW believes that BPA should not consider developing an in-house data system, but should instead rely on the direction of the Council and CBFWA to identify a workable approach to developing a regional data system. ODFW does, however, strongly agree that a more comprehensive database management budget that includes existing data management efforts is needed. While “no duplication” may not be achievable initially, it should remain a goal; duplication should be reduced wherever possible. Greater sharing of

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resources, cooperation among the existing projects, and more defined role definition would greatly enhance the success of this goal.

In conclusion, ODFW offers the following suggestions to address some of the ideas put forth in the Columbia River Data Center proposal. The Council should:

- Support development of data protocols so that data collected is useful in meeting regional needs.
- Provide greater support and assign high priority to improving data systems currently maintained by agencies and tribes.
- Implement a strategy that starts with the existing centralized data projects, but moves toward decentralization as the data collecting entities build internal data systems and make more data available electronically. This approach was recommended in part, in the SAIC report which emphasized using existing projects as building blocks for a regional data system.
- Develop standard reporting/data sharing requirements for BPA funded projects. A specific example would be requiring BPA funded projects to make their data available through existing data management projects, like StreamNet. Existing data management projects will need clear, reasonable direction and goals (through the Council and CBFWA), adequate staff and funding, and administrative Council-level support within the FWP.
- Recognize the importance of non-BPA funded information and implement a strategy that involves those efforts through incentives to participate in the creation of proposed standards. The approach suggested in the proposal to establish an advisory committee is a start. However, agencies simply do not have the resources to prioritize data standards that meet only regional needs, so additional resources would allow greater participation.

We thank you for this opportunity to comment on this proposal, and we make ourselves available to answer any question you may have.

Respectfully,



Stephen H. Williams
Interim Fish Division Administrator

cc: Ed Bowles, Fish Division Administrator
Tony Nigro, Ocean Salmon & Columbia River Program Manager
Cedric Cooney, Natural Resources Information Management Supervisor