



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

March 11, 2016

In reply refer to: EW-4

Mr. Henry Lorenzen, Chair  
Northwest Power and Conservation Council  
851 SW Sixth Avenue, Suite 1100  
Portland, OR 97204-1348

*Henry*  
Dear Mr. Lorenzen:

Thank you for the opportunity to review and comment on the draft "Critical Uncertainties for the Columbia River Basin Fish and Wildlife Program" (draft Report) recently completed by the Independent Scientific Advisory Board and the Independent Scientific Review Panel in January 2016. The Bonneville Power Administration (BPA) currently funds approximately \$80 million per year for research, monitoring, and evaluation (RME) related to mitigation for the federal dams, all paid for by the region's electric ratepayers. Fish and wildlife mitigation actions funded by BPA must be effective and efficient at achieving the desired results, informed by appropriate RME. Likewise, the draft Report and the Northwest Power and Conservation Council's (Council) Columbia River Basin's Research Plan should inform the effective and efficient implementation of the Council's Fish and Wildlife Program (Program).

By way of background, guided by the Council's Program and various Biological Opinions (BiOp) for endangered species, BPA and regional partners have successfully implemented an "All-H" approach to protect, mitigate, and enhance fish and wildlife affected by the development and operation of the Federal Columbia River Power System (FCRPS). Our approach is based on use of the best available scientific information, strives for use of the lower cost alternative to meet defined biological objectives, and addresses many of the critical uncertainties identified in the draft Report and the 2006 Research Plan. Fish passage survival at dams approaches or exceeds performance standards of 96% and 93% for spring and summer outmigrants, respectively. Tributary habitat restoration, targeted to key limiting factors, has resulted in thousands of miles of access to blocked habitat and hundreds of miles of riparian habitat and floodplains have been restored. Several hundred thousand acre/feet of water are now protected for benefit to fish, and thousands of acres of estuary floodplain habitat have been restored. The All-H approach, coupled with recent favorable ocean conditions, has led to a significant increase of Interior Columbia Basin salmon and steelhead populations. In fact, the cumulative average increase for wild Chinook salmon populations has more than tripled, and for steelhead populations the average has more than doubled. Further, some of the largest total returns of adult salmon and steelhead since 1938 have occurred during the past decade. Clearly, improvements throughout the hydrosystem and freshwater habitat, as well as best management practices with artificial production, have contributed to substantial increases in abundance of Columbia River Basin anadromous fish. From this basis, BPA offers a couple of observations on the draft Report.

First, BPA is committed to collaborate with the Council on the update of the 2006 Research Plan to better define priorities with mutually agreeable, targeted outcomes that provide value to decisions on mitigation, and to align priorities within the available budget. However, there is much work to be done as the current draft Report does not prioritize the 50 critical uncertainties. BPA sees the risk-uncertainty matrix in the Council's Program as a potential means to help assist the development of the revised Research Plan and to aid decision-making. Leveraging the draft Report to inform a strategic, feasible, and achievable Research Plan that takes advantage of the vast scientific body of research that has been accumulated over the last ten years is essential. There has been substantial progress with better understanding of uncertainties, evidenced in part by the reviews contained in Appendix D of the draft Report. We caution against an interpretation of the draft Report that there has been little progress since the 2006 Research Plan.

Second, BPA will continue to support projects that produce biological benefits to species impacted by the construction and operation of the FCRPS, including projects necessary to fulfill our Reasonable and Prudent Alternative's commitments in the current BiOp. Consistent with the Council's 2011 recommendations, we will also be continuing our focus on RME reforms that take a programmatic perspective, improve their analysis and synthesis of results to inform management decisions, coordinate results across federal agencies and others, and that make use of new technologies. In contrast, projects that do not provide information useful for management decisions or with weak or absent nexus to our FCRPS obligations are not a BPA priority. For example, the draft Report notes many regional uncertainties that may be of interest or concern, yet have little or no nexus to the effects of the FCRPS, including themes such as toxic contaminants, non-native species, harvest, human development, and others. It will be important to clearly identify the scope and expectations of the Research Plan to avoid potential conflicts early in the process.

We support a Research Plan that provides a consistent, well defined and scientifically credible approach to guide RME efforts and support management decisions. To that end, we are committed to working closely with the Council on this endeavor, and look forward to development of a prioritized Research Plan that better informs our mitigation based on useful results.

Sincerely,



William C. Maslen  
Manager, Fish & Wildlife Program

cc.

Ms. Jennifer Anders, Montana Council Member, NPCC  
Mr. Tony Grover, Fish and Wildlife Director, NPCC