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TO: Mr. Tony Grover

RE: Technical Comments on the Report Critical Uncertainties for the Columbia River Basin Fish and Wildlife Program (ISAB/ISRP 2016-1)

The Confederated Tribes of Grand Ronde (Tribe) welcomes this opportunity to provide technical comment on the *Critical Uncertainties for the Columbia River Basin Fish and Wildlife Program* (Report).

Comments on Report

REVIEW CHARGE, APPROACH, AND PRODUCTS – Page 13. The Report identifies that the prioritization process is “qualitative in nature”. Also, the Report emphasizes that “additional contributions from fish and wildlife managers, project proponents, researchers, and others are needed to inform the Council’s research plan development process”. There are many Critical Uncertainties for fish that are directly associated with the management of the federal hydropower system in the Willamette Subbasin. The Tribe welcomes the opportunity to collaboratively work with others in developing basinwide research priorities.

IDENTIFYING PRIORITIES - Page 16, first paragraph - It is understood that the financial costs associated with resolving an uncertainty are difficult to estimate until research plans are fully developed. Therefore, the prioritizing process does not factor in costs. In general, funding for Pacific lamprey research has been very limited. Due to their complex biological nature, the costs to address Pacific lamprey uncertainties tend to be high relative to other native fish species of the Willamette Subbasin. Fish listed under the Endangered Species Act (ESA) seem to get automatic priority over non-listed fish when it comes to research. Given the Tribal importance and rapidly declining populations of Pacific lamprey, their status should be considered equivalent to ESA species when prioritizing basin wide efforts.

ESTABLISHING INFRASTRUCTURE NEEDED TO ADDRESS UNCERTAINTIES – Page 17. The 2006 Research Plan emphasizes the need for a “Regional Research Partnership: A forum for Collaboration”. The Report outlines three possible, long-term alternatives: 1) Establish an Institute; 2) Foster research design and implementation teams with specific agreements and for coordination and collaboration; 3) Formulate specific Requests for Proposals to address several of the top priority Critical Uncertainties. To be successful, these “Research Partnerships” would need to be species-specific to draw in the necessary expertise to the discussion table. To encourage continued participation, round table discussions must include the represented areas of all participants. Tribal participation in the Regional Partnership is strongly recommended.

THEME: PUBLIC ENGAGEMENT – Page 18. The theme “Public Engagement” is a commendable addition to the list of Critical Uncertainties. The public is a significant driver in fish and wildlife recovery. Public opinion can have a way of either creating hurdles or streamlining recovery processes. The National Marine Fisheries Service recently initiated the

Columbia Basin Partnership, a stakeholder group focusing on recovery of listed and non-listed stocks of salmon and steelhead in the Columbia Basin. This process is seeking a transparent partnership of sovereigns and stakeholders working together to develop science-based and results-driven goals for Columbia basin salmon and steelhead.

THEME: TRIBUTARY HABITAT – Page 24. The Willamette Subbasin has 13 federal dams, of which 7 produce hydropower. Though the operations of mainstem Columbia River dams likely have biological effects on the outmigration of Willamette Subbasin fish in the estuary, it should not be forgotten that addressing critical uncertainties with high head dams on some of the most productive spawning habitat in the Willamette Subbasin should be identified and incorporated in the NPCC Fish and Wildlife Plan. Therefore, the Critical Uncertainties for TRIBUTARY HABITAT should consider the following: Critical Uncertainty #2) is not only a question of “carrying capacity” but is a question of “productivity” and “replacement rates”. Currently, it is known there is successful production of salmon, steelhead and lamprey below some federal dams in the tributaries. There is evidence that production can be very successful above these projects, yet downstream passage, reservoir operations and survival may reduce replacement rates to the point where transport operations are not sustainable. Critical Uncertainties should address unknowns such as reservoir operational effects on survival, passage mortality/survival, delayed mortality, and fish replacement rates. Pacific lamprey have been documented spawning below tributary project dams. Given the passage designs’ focus on salmonid needs, does the transport of Pacific lamprey above high head dams increase their net productivity given potential high mortality rates in the reservoir? This is a critical uncertainty that should be addressed.

THEME: HYDROSYSTEM FLOW and PASSAGE OPERATIONS – Page 26. The Willamette Subbasin is a stronghold for Pacific lamprey and these fish have been observed spawning below federal high head dams. It is not known what the effects of flow and stream temperature management targets are on spawning and incubating Pacific lamprey downstream of these projects. These uncertainties don’t really fit in the five uncertainties identified under HYDROSYSTEM FLOW and PASSAGE OPERATIONS, and should be addressed in their own category of uncertainties.

Again, thank you for the opportunity to provide technical comment. The Tribe looks forward in working with the NPCC in developing a comprehensive Research Plan for the basin.

Sincerely,

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Confederated Tribes of Grand Ronde