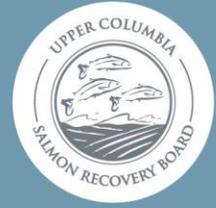


Working to restore viable and sustainable populations of salmon, steelhead and other at-risk species through collaborative, economically sensitive efforts, combined resources, and wise resource management of the Upper Columbia Region.



April 7, 2017

Henry Lorenzen, Chair  
Northwest Power and Conservation Council  
851 SW 6<sup>th</sup> Ave, Suite 1100  
Portland, OR 97204

Chair Lorenzen,

The purpose of this letter is to respond to questions and submit comments on the Independent Scientific Review Panel's (ISRP) Review of Umbrella Habitat Restoration Projects (ISRP 2017-2) as they relate to the Upper Columbia Programmatic Habitat Project (BPA project #2010-001-00). UCSRB appreciates the ISRP's thoughtful review of our programmatic project. We have taken note of numerous helpful suggestions and comments, and look forward to working with BPA and the Council to make positive changes in our project moving forward. We are especially interested in developing quantitative goals and objectives, and developing a regional list of prioritized actions to feed into the UC Programmatic Project.

Below are our responses to specific questions raised by the ISRP in their review of the UC Programmatic.

1. Page 47 – *“Is there a systematic approach for determining the design life of restoration projects and for scheduling when refurbishment and replacement will likely be needed? A systematic approach to ensure periodic maintenance could help to avoid a budgetary bottleneck in years when many projects suddenly need to be fixed.”*

Response: We currently do not have a systematic approach to determine design life and do not have a process for planning and budgeting for project maintenance over the long-term. We do maintain a small budget set aside for short-term fixes to structures that may arise. We estimate a design life of 10-50 years depending on the intent and engineering of the structure, and would welcome conversations with BPA about how to plan and budget given the expected timeframe for maintenance. This is something we have recognized as an ongoing issue that could use attention.

2. Page 47 – *“It seems that insufficient data are available from “reach assessment” or “rapid site assessment” in advance of proposals to inform the decision-making process. This gap suggests the need for a strategy to gather or compile information relevant to evaluating future high priority projects **before** a call is made for proposals (qualification 3). For example, has there been*

*a concerted effort using a standardized sampling approach (e.g., Generalized Random Tessellation Stratified [GRTS]) to study how target fish species use habitat near potential and completed restoration sites, with a view to providing information in advance of proposals to restore new sites?”*

Response: It is correct that reach assessments and rapid site assessments offer insufficient data in advance of proposals to inform decision-making. Reach assessments are helpful in identifying the best location and the geomorphic context for a project. Rapid assessments, when they occur, are helpful in mapping habitat features and providing some information on fish use. Most monitoring and research in the Upper Columbia is aimed at large-scale questions of watershed-scale habitat and does not inform project goals, objectives, or design criteria. Information needed includes limiting factors within watersheds and the causes of those limiting factors (what is the problem we are trying to address with our projects?), habitat quality at the watershed and network scale (where does the project need to be and what does it need to achieve?), and project-specific fish and habitat information (how do we design this project?).

The ISRP suggested a GRTS designed study of fish and habitat as a potential solution to this problem. There has been a concerted effort to study habitat and how target fish species use habitat in the Upper Columbia subbasins (CHaMP and ISEMP). However, these programs generally do not provide information specific to how to define restoration projects. These data do not help identify limiting factors (survival bottlenecks), or the causes of those factors. Furthermore, because of the stratified GRTS design very few of the monitoring sites ended up near potential projects (e.g. willing landowners or project opportunities), and therefore did not help define project goals, objectives, or design.

In the Okanogan, the Colville Confederated Tribes adapted the ISEMP program to address these issues, and the program became what is now called Okanogan Basin Monitoring and Evaluation Program (OBMEP), which uses a network approach and rapid assessments to more thoroughly cover the areas where sponsors are working and where potential projects could be developed. The OBMEP program specifically develops tools and information to inform project development and restoration planning. A similar effort is underway in the Methow. Additionally, a current prioritization effort in the UC aims to answer some of the questions related to project development and design by gathering all information related to habitat and life-stage limiting factors, and developing a prioritized list of projects with specific goals to address recovery of local populations.

3. Page 48 - *“The progress report says (p. 23) that the project to restore channel structure and form in Upper Beaver Creek was adversely impacted by wildfire debris flow in 2014 and that infrastructure had to be replaced. How was this (unplanned) work funded?”*

Response: Project sponsors used funds from a variety of sources to restore the project area following the fire that burned 79% of the watershed. The rebuilding of a BPA-funded diversion that was destroyed by the wildfire was funded by US Fish and Wildlife and Bureau of Reclamation funds. Other actions including culvert removal, bridge installation, and exclusion fencing were completed using Habitat Conservation Plan Tributary Committee and Salmon Recovery Funding Board funds. Currently, the Dept. of Ecology is funding a geomorphology study to guide future work in the tributary given the changes caused by the fire.

4. Page 48 - *“Presumably more high priority actions are proposed than can be funded in each round. The progress report does not indicate if a “master list” of high priority actions is maintained as a living document or if a new list of actions is generated every two years. It is also not clear whether the consequences of delaying action for each priority item are considered in a way that would affect reprioritization in the next review.”*

Response: Projects identified as high priority projects but not funded during a given year are placed on what is called the provisional list. This is a living document that is used in planning and provides a list of projects for future funding. Oftentimes, projects identified as provisional are later funded under the programmatic (once funding is available or outstanding issues are addressed). When provisional projects are considered for funding they are considered in the context of other funding opportunities in the region, and prioritized based on their benefit compared to all opportunities.

To address the need for a master list of prioritized actions in the region (beyond the list of provisional projects), the region is currently updating its regional priorities. The primary goal of the current Prioritization Framework is a list of scientifically-sound actions that address limiting factors in priority areas. Projects will be informed by fish population and habitat data as well additional information such as land ownership and project feasibility. The Prioritization Framework will leverage existing information from multiple organizations to provide comprehensive and accessible fish and habitat data at multiple scales across the region, including interactive, online maps and subbasin reports. These data and information will be used to refine and update priority areas, identify limiting factors (associated with life-stages where such data are available) and identify actions within those areas that will address limiting factors. Such information will be used by partners, sponsors, and funders engaged in habitat restoration and protection. This list of priority actions will be used for selecting future Programmatic projects in coordination with other regional funders to ensure the highest priority actions are funded.

5. Page 50 – *“Several different groups collect data relevant to this umbrella project (p. 32). The data appear to be shared (but in separate databases) and appear to be readily available. Is there coordination among participating groups on which data should be collected and the standards for collection and reporting so that results can be compared among participants?”*

Response: Generally, there are just a few entities gathering pre-implementation and project effectiveness data. Because of the lack of monitoring funding associated with project design and implementation, sponsors are using existing staff resources to gather these data to inform project design and evaluate project effectiveness. The most frequent monitoring is habitat and snorkel surveys, and is generally consistent among projects. Data collection by BPA-funded programs (AEM, OBMEP, ISEMP, IMW) follows the standards of those programs. For large-scale programmatic projects, this data collection has become standard because of the work of the design teams, and financial support from Bureau of Reclamation. In addition, monitoring in the region follows the guidance of the [Monitoring Strategy for the Upper Columbia Basin \(Hillman 2006\)](#). There is some level of coordination among monitoring entities through the regional Monitoring and Data Management Committee and the Regional Technical Team.

In addition, we noticed a few errors in the summary tables presented in the ISRP Review. On Appendix Table 1, page 52, the reported metrics for the Upper Columbia Umbrella Project should be 273 acres and

16 miles instead of those listed. On Appendix Table 4, page 55, it incorrectly states that habitat acquisition is funded under the Upper Columbia Umbrella Project.

We appreciate the Council's support of this programmatic approach, and we believe it has yielded strong results for both the mitigation responsibilities of the Council and BPA, and in contributing towards achieving recovery goals. The close working relationship with BPA, Council staff, and the ISRP continues to be valuable to UCSRB in executing the programmatic project. We are eager to find synergy in the Council's needs and our regional process. It is our hope that we can continue to communicate our progress and engage the expertise of the ISRP in this effort.

Sincerely,

A handwritten signature in cursive script that reads "Melody Kreimes".

Melody Kreimes  
Executive Director

cc: Roy Beaty, BPA  
Joe Connor, BPA  
Lynn Palensky, NWPCC