Memorandum (ISRP 2009-38)  
August 26, 2009

To: Tony Grover, Fish and Wildlife Division Director, Northwest Power and Conservation Council

From: Eric Loudenslager, ISRP Chair

Subject: Review of Accord Proposal, Yakama Nation Status and Trend Annual Report (2009-002-00)

Background

At the Council’s July 31 request the ISRP reviewed the Accord proposal, Yakama Nation Status and Trend Annual Report (2009-002-00). According to the proposal, “The long-term goal of the Status and Trend Annual Report project is to support mitigation described in the 2008 FCRPS Biological Opinion and the obligations of the NPCC Fish and Wildlife Program by annually reporting progress towards salmon recovery efforts relevant to the Columbia Cascade Province and within the Ceded Lands of the Yakama Nation. This work will be in coordination with, and will support other local and regional efforts including but not limited to Upper Columbia Salmon Recovery Board, the State of Washington, NOAA Fisheries, U.S. Fish and Wildlife Service, BPA and the NPCC Columbia Basin Fish and Wildlife Program.”

ISRP Recommendation

Response Requested

The production of an annual report on RM&E is a very worthwhile endeavor, and the use of a coordinator dedicated to producing this report annually may be a very reasonable approach. However, all subbasin stakeholders should be of the same opinion before this effort is initiated. Also, the activities proposed for the STAR coordinator during the initial 10 months of this project appear to be less ambitious than they might be. A significant amount of progress towards the first STAR could be made in this time frame rather that simply generating an outline of what the report should contain.

A revised proposal is requested that:

- clearly documents that there is agreement among the stakeholders that this is a reasonable approach;
- describes the procedures for coordination with other agencies and organizations doing similar work (regional coordination of anadromous salmon RME for the BiOp, FWP, High Level Indicators, PNAMP implementation monitoring);
• has objectives and timelines clarified and altered to better reflect what could be accomplished during the initial phase of this project; justifies why only a table of contents will be generated in the first year or describes additional anticipated progress;
• describes procedures for encouraging and documenting stakeholder input and feedback as part of monitoring and evaluation of STAR.

General ISRP Comments

The region is attempting to review the adequacy of monitoring and evaluation to meet the 2008 BiOp RPAs and Fish and Wildlife Program needs, the Bonneville Power Administration (BPA) has developed Pisces and Taurus to report and track information on projects, the Council is developing High Level Indicators with input from regional managers. The region is beginning to track (monitor) implementation and is organizing this effort through the Council, BPA, and PNAMP. How the Yakama Nation status and trends report (and coordinator) will interface with these active efforts is not discussed in the proposal. The proposal states that it will not be an easy undertaking, that there are many habitat and biological characteristics to consider, and that many details of the reporting scope are yet to be determined. This makes it sound like the coordinator and Yakama Nation will be almost starting from a clear slate (albeit using the 2004 subbasin plans to identify limiting factors). Given the meetings and forums underway in August and September 2009 to standardize metrics and reporting, the tone of the proposal seems disconnected from other activities in the region.

Specific ISRP Comments

1. Technical Justification, Program Significance and Consistency, and Project Relationships (sections B-D)

The ultimate objective of this proposal – to generate an annual report on RM&E efforts in the Upper Columbia Subbasin that the authors term a Status and Trends Annual Report (STAR) – is certainly worthwhile. In fact, it is the type of product the ISRP has recommended that all the subbasins generate on a regular basis. The project proponents indicate that this report will include “… 1) the Primary Limiting Factors at the watershed scale, 2) specific actions either being implemented or being planned that will address those limiting factors, 3) expected (and measured) habitat changes at the stream-reach scale, 4) methods data for measuring these changes, 5) analysis process for drawing conclusions and, as appropriate, 6) estimated changes in biologic productivity.” This type of information is essential to ensure that tributary habitat restoration actions are as effective as possible.

However, there are some issues related to the proposed approach to achieving this goal that cause concern. The actions covered by this proposal will only generate a “table of contents” or outline of what information the report should include. It would seem that much more would be possible with a person (STAR coordinator) dedicated full time to this activity. In fact, the “table of contents” should be a product that is jointly developed by the stakeholders on the Upper Columbia Salmon Recovery Board (UCSRB) and handed to the STAR coordinator to execute. At a minimum, the STAR coordinator should be able to locate and begin to compile those data that are relevant to producing the first report within the first 10 months of employment.
A second problem is the apparent lack of communication with the other members on the UCSRB about the proposed approach to developing the STAR. The proposal specifically indicates that the Colville Tribes have not been involved in the development of this proposal. It is unclear whether any of the other participants on the UCSRB are aware of this plan. The chances of success would be greatly enhanced if it was clear that all the stakeholders agreed that this was a reasonable approach to generating annual reports and that they will willingly share data and cooperate with the STAR coordinator. A standardized reporting format is of little value unless all participants are on board. Agreement among the UCSRB members should have been achieved prior to submitting this proposal. If some members of the UCSRB object to this approach, there will be little to coordinate. Indications of support and cooperation for STAR should be provided as part of a response.

2. Objectives, Work Elements, and Methods (section F)

The objectives seem under ambitious for the resources that are being requested. Early in the proposal, a set of six desired outcomes for this project was described (quoted in the comment above). These objectives specify the type of information the STAR will contain – information critical to effective salmon recovery in this subbasin. However, the objectives listed in this section do not reference back to these key elements but simply indicate that the coordinator hired for this project will coordinate with other stakeholders and produce a “table of contents” for the STAR. As stated above, over the first 10 months, this coordinator should be able to make significant progress on the initial STAR report, not simply produce an outline of what it should contain.

The Work Elements and some of the associated timelines are confusing. Many of the start dates and at least one of the completion dates have passed. Will the schedule be altered relative to the date on which the project actually begins? The description of the actions under the “Process Outline” work element is not clear “documentation of a process framework that will achieve development of a STAR Table of Contents and associated material contents and formats.” What specifically does “documentation of a process framework” entail? Also, the proposed timeline for this work element seems out of sync with the timelines produced later in this table. One milestone indicates that the “table of contents” will be completed February 19, 2010. But the “Process Outline” milestone suggests that activities related to development of the “table of contents” will extend into August of 2010. The objectives and milestones should be clarified and tied back to the technical objectives provided in the Program Justification section.

Some Work Elements such as defining limiting factors and identifying existing data gaps seem to demand collaboration among many parties to be effectively accomplished. How will the Star Coordinator involve other local and regional entities?

3. M&E (section G, and F)

Monitoring and evaluation through “routine comments and critique of Draft Annual Reports” is not adequate. An organized and documented solicitation of input from the target audience for the reports should be implemented. Descriptions of incentives for participation, if any, should be provided. The proposal mentions allowing stakeholder input, but more description of how stakeholder input and feedback will be encouraged and documented is necessary as part of the monitoring and evaluation of the project.