



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**

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Ms. Nancy Leonard  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, Oregon 97204

Dear Ms. Leonard:

Thank you for the opportunity to comment on the Northwest Power and Conservation Council (NPCC) staff's document entitled "Draft Basinwide Monitoring, Research, Evaluation, Reporting, and Data Access Framework". I believe the document does provide a framework for the NPCC to move forward in these areas. Despite this support, I do have some concerns on the scope of strategies, and the lack of recognition of other non-council led processes that facilitate this framework. My read of this framework is that stronger coordination and functioning forums between Council, BPA, federal, state, tribal, and others in the area of monitoring, research, evaluation, reporting, and data access would benefit the Columbia basin and the Council's program. However, the specifics of the forums and coordination processes still need to be developed.

*Primary Strategies*

I support the staff's primary strategies of an evaluation of population response to habitat actions and artificial production actions. However, the Council's program as documented in subbasin plans has strategies in all the H's, which also include hydro and harvest action effectiveness as well as habitat and hatchery effectiveness. I encourage the scope of the primary strategies be expanded to all H's to better reflect the subbasin plans. The success of adaptive management is based on open and transparent processes for data collection, storage, access, analysis, and reporting. I agree that reporting has been narrowly focused often due to the scope of many contracts, and moving towards regional reporting such as the Comparative Survival Study (CSS) and the Ocean Synthesis Report would benefit the region. The Coordinated Assessments (CA) is another recent example of developing a regional reporting structure for indicator reporting.

*Evaluation, Reporting and Data Access*

Data collection is the cornerstone for fish and wildlife program decision, and without proper data management the basis for many program decisions may be called into question. The creation of the Program Evaluation and Reporting Committee (PERC) following the last categorical review has begun to address the issues raised under this topic. While the PERC has been very informative it has been challenging to come up with quick resolutions to long-term data management and coordination challenges, and it would be useful to have an ongoing PERC process to address these needs.

*Evaluation*

I support the specific strategy that RM& E be conducted and analyzed at the appropriate scale to answer the key management questions for the F&W program, be reported in a timely manner,

and contribute to the adaptive management process. I further support the collaboration of RM&E and sharing results in a large suite of reporting forums. However, to move away from individual projects to a regional collaborative process will require the support of staff to engage in regional collaboration and forums.

### *Reporting*

I also support that the project sponsor analyze and report on the data collected by their project. This framework recommends data synthesis and reporting at the appropriate scale from the science community (ISRP), to policy (Council) and to the public (region). This multi-level reporting creates challenges for the project sponsor, and new processes, forums, and templates/forms are needed to better assist project sponsors with these challenges. In general the four areas of reporting (emerging science, program implementation, program progress, and action effectiveness) will better inform the Council. Currently, project sponsors are not funded at a level to fully engage in all of these reporting areas.

### *Data Access*

I agree that the Council's program will benefit from data sharing through the standardization of measures, metrics, and indicators, the requirement of common attributes in similar RM&E programs, and accessible databases with the proper documentation. As demonstrated in the CA project this is possible, but to meet all of the guiding principles for data management the region has a long way to go. In addition, it is noticeable that there is no linkage between this document, the data management strategies developed in the CA project ( <http://www.pnamp.org/document/3546> ), and BPA's draft data management strategy. In addition, it is unclear how BPA's draft data management strategy aligns with this framework.

### *Monitoring and Research*

The Council's program is geographically organized at the subbasin, province and Columbia basin levels. Fish and wildlife populations are similarly hierarchically organized by population, major population group, and Evolutionary Significant Unit or Distinct Population Segment (ESU/DPS), and the Columbia basin. However, the nature of the current proposal process encourages project sponsors to submit proposals at the finer project scale. One approach is that proposals are hierarchically organized and spatially well coordinated. An example of this type of an approach is the Ad Hoc Supplementation Monitoring and Evaluation Workgroup report ([www.nwcouncil.org/fw/.../Final%20Draft%20AHSWG%20report.pdf](http://www.nwcouncil.org/fw/.../Final%20Draft%20AHSWG%20report.pdf) ). Again this type of a multi-agency work group would require a shift in the normal proposal process to develop large scale umbrella projects.

While the risk-uncertainty matrix is appropriate for research, it does not relate to the monitoring and research to the priority of the key management questions or decisions. I recommend that you consider a way of expanding the matrix to address this area.

### *Monitoring*

I agree with the monitoring strategies but suggest you add that all monitoring programs have statistical supported designs, report on confidence intervals for their indicators, and that fish populations response to all H's be part of a suite of monitoring designs, not just habitat. In addition, I suggest that the Council examine the integration of different programs for cost effectiveness, such as PIT tags which are being considered by the tagging forum (<http://www.cbfwa.org/csmep/web/documents/Documents.cfm?IssueID=43&doctype=Workgroup> ). I support the guiding principles with the caveat that effectiveness monitoring is for all H's.

*Research*

Research addresses critical uncertainties and develops new approaches to challenging problems. Recent approaches to genetic monitoring of adult steelhead populations at Lower Granite Dam to estimate adult abundance is an example of how the development of a new approach based on genetic research helped solve a 40-year old monitoring challenge.

*Overarching Guidance*

The key to the overall guidance is found in your foot note 11. “Who is responsible to ensure sharing, coordination, collaboration, evaluation, reporting etc is done may need to be made explicit if this guidance is supported by the region for inclusion in the 2014 program”.

My observation is that more coordination and regional forums and the funding to support these will be needed to work collaboratively to implement this approach for “Basinwide Monitoring, Research, Evaluation, Reporting, and Data Access Framework”. Please contact me if you have any questions.

Sincerely,

Dan Rawding  
Columbia River Policy Coordinator

cc: Phil Rockefeller  
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