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A People of Vision

A Confederation of the Salish,
Pend d' Oreilles
and Kootenai Tribes

September 17, 2013

Bill Bradbury, Chair
Northwest Power Planning Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204-1348

RE: CSKT Recommended Amendments to Columbia River Basin Fish and Wildlife Program

Dear Mr. Bradbury,

On behalf of the Confederated Salish and Kootenai Tribes, attached please find the Tribes' recommended amendments to the Northwest Power and Conservation Council's (Council) Columbia River Basin Fish and Wildlife Program (Program). Also enclosed is the Resolution of the Tribal Council supporting the Tribes' recommendations.

We have focused our comments on Tribal concerns and priorities but they are not necessarily exhaustive. With further drafts anticipated, we've prioritized the most significant issues at this point in the process. Notably, they are not intended to reflect all CSKT's Treaty and/or aboriginal rights in the Columbia Basin's fish and wildlife resources.

We believe our recommendations are necessary to effectively and efficiently implement fish and wildlife mitigation goals shared by both the Program and the Tribes.

We thank you for considering our comments and request and look forward to the opportunity to participate in all facets and phases of the process for Program amendment and subsequent implementation.

Please contact Lynn DuCharme in the CSKT Fisheries Program if you need additional information or assistance with our comments or any related matter.

Sincerely,

Joe Durglo, Chairman

Recommendations of the Confederated Salish and Kootenai Tribes To Amend the Northwest Power and Conservation Council's *Columbia River Basin Fish and Wildlife Program*

The Confederated Salish and Kootenai Tribes (Tribes) have participated in the Northwest Power and Conservation Council's (Council) Columbia River Basin Fish and Wildlife Program (Program) for over 20 years. During that time we have developed experience and familiarity not only with the Program but also with fish and wildlife mitigation actions needed to mitigate impacts and losses resulting from Hungry Horse and Libby Dams. The Tribes' recommendations are based on this experience and familiarity and are needed to effectively and efficiently implement the fish and wildlife mitigation goals shared by both the Program and the Tribes. We therefore respectfully submit these recommendations and request to participate in all facets of the process for Program amendment and subsequent implementation.

The Tribes' recommendations are broken into three major sections:

(1) Wildlife
   a. Implement HEP Wildlife Impact Assessment
   b. Wildlife Operational Impacts
   c. Adequately Fund Wildlife Projects

(2) Resident Fish
   a. Resident Fish Mitigation and crediting
   b. Address the Threat of Climate Change to Resident Fish
   c. Management of Non-native fishes as Resident Fish Mitigation
   d. Resident Fish Loss Assessments

(3) Species Focused Recommendations
   a. Species recovered in the context of the ecosystem
   b. Integration with Endangered Species Act
   c. Integrate Climate Change
   d. Implement Predator Control
   e. Prevent Establishment of Aquatic Invasive Species
   f. Review Implementation of Program Measures
   g. Establish a Regional Coordination Forum

All are necessary to effectively and efficiently mitigate impacts to Tribal natural resources caused by Hungry Horse and Libby dams. Our technical and legal staffs look forward to working with the Council and other participants to successfully draft and implement our proposed amendments.

1. WILDLIFE

Measure: Implement HEP Wildlife Impact Assessment

Rationale: Assessments of the impacts to wildlife from the construction and inundation of the Hungry Horse and Libby Projects were completed in 1984. These were the first mitigation assessments of hydroelectric dams completed within the Columbia Basin. In the years since, methods within the basin have evolved to assess and mitigate wildlife losses using habitat evaluation procedures (HEP). HEP have become "the standard of the industry" within the basin and are widely and consistently used when assessing impacts and assessing mitigation proposals/activities. HEP provides consistent results and allows different projects to be compared over both time and space. The Hungry Horse and Libby Wildlife Impact Assessments were completed using methods that were neither approved nor adopted by the Program. Accordingly, its results, may be unreliable and are inconsistent with the rest of the region. Therefore, BPA shall fund the reassessment of wildlife impacts from construction and inundation at the Hungry Horse and Libby projects utilizing HEP methodology. Additionally, BPA shall fund the assessment of habitat currently protected under the Montana Agreement utilizing the HEP methodology. This will ensure that construction and inundation impacts are consistent with the rest of the region.

Wildlife Operational Impacts

Current Program: Page 22, Operational Losses

Measure: BPA should fund the agencies and tribes to complete operational impact assessments using methods that provide a systematic approach to characterize active physical and biological processes in watersheds and describes spatial distributions, histories and linkages among important ecosystem components. A framework for assessing operational impacts shall be in place by 2015 with assessments initiated that same year.

Rationale: Hydropower operational impact assessments are needed to determine the extent and directions of ecological alterations and to institute a standard, rigorous, transferable, and regionally accepted assessment methodology to describe and quantify ecological losses attributable to the FCRPS. The 2009 Program stated that the Council, with F&W managers and BPA, will assess the value of committing program resources on direct operational impacts on wildlife habitat. The Council should use its Wildlife Advisory Committee to convene the wildlife managers and BPA to develop protocols for assessing operational impacts. The WAC should develop/review accepted methods to assess impacts from operations (i.e., functional impairments from lost peak flows, erosion, trophic impacts, changes in species composition, and other impacts identified by Forum). Possible sources for information include recent ISRP reviews and the pilot project nearing completion in the Kootenai Subbasin. The goal of the forum should be to have regionally accepted protocols by 2015 and completed operational loss assessments by the completion of this 5-year Program.

The ecological impacts to wildlife populations due to the loss of fish and the losses caused by the operations of the hydro system have not been assessed. The fish and

wildlife resources of the Columbia Basin have been deprived of marine-derived nutrients associated with the return of adult anadromous fish. The implications of this impact, while not yet clearly defined or quantified in terms of wildlife, must be mitigated and the 2009 Program increases this emphasis. Given the vision of this program, the strong scientific case for a more comprehensive, ecosystem-based approach, and the shift to implementation of this program through provincial and subbasin plans; wildlife mitigation projects should complement fish mitigation projects to the extent practical while requiring that, to be counted as "mitigation", any action must cause specific, independent, and verifiable benefits.

Ecosystem management should maintain or recover the biological integrity of the system. Determining the extent to which ecological systems are experiencing anthropogenic disturbance and change in structure and function is critical for long-term conservation or restoration of biotic diversity in the face of changing and compromised landscapes and land use. To determine parameters needed to address ecological integrity, the Council, wildlife managers, and BPA will adopt a framework that can: (1) identify and isolate operational impacts from other basin changes, (2) assess operations-based influences on downstream physical processes, (3) link physical, biological, and ecological processes (4) account for natural floodplain dynamics, and (5) be used in a predictive capacity.

BPA should fund assessments of ecological impacts to wildlife from the reduction or loss of anadromous/resident fish as part of the operational loss assessment. The assessments need to evaluate an array of core ecological parameters(e.g., biological/biotic and physical/abiotic) with the understanding that habitats, communities, and processes are ecologically linked. The results of these assessments will be the basis for quantification of operational impacts and subsequent mitigation obligation. Existing and future habitat actions implemented to benefit anadromous fish may be suitable mitigation for some of these impacts.

Adequately Fund Wildlife Projects

Current Program: Pages 20-22, Wildlife Strategies

Measure: BPA shall fund existing and future projects at levels adequate to implement wildlife area management plans.

Rationale: Funding needs to continue to maintain the base level of habitat and credits accomplished to date. BPA will fund existing and future wildlife projects at levels determined to be consistent with the project management plans. Funding must be sufficient for habitat maintenance and enhancement, and appropriate monitoring as agreed upon in the management plans. Where management plans are not in place, BPA will provide interim funding to manage the wildlife projects and complete the management plans.

2. RESIDENT FISH

Resident Fish Mitigation and crediting
Current Program: Pages 22-23, Resident Fish Mitigation and Crediting

Recommendation: The Council should continue to support and BPA shall fund the existing language in the 2009 Program regarding resident fish mitigation, on pages 22-23. In addition:

- Maintain the existing language from the 2009 Program listed below with modifications shown in bold:

    - Resident Fish Mitigation Settlement **and Multi-year** Agreements Whenever possible, resident fish mitigation via habitat acquisitions should take place through long-term **or multi-year** agreements that, ~~**as with wildlife mitigation agreements,**~~ have clear objectives, a plan for action over time, a committed level of funding that provides a substantial likelihood of achieving and sustaining the stated ~~**wildlife**~~ mitigation objectives, and provisions to ensure effective implementation with periodic monitoring and evaluation.

    - Provisions **to assure** for long-term maintenance of the habitat adequate to sustain the ~~**credited**~~ habitat values for the life of the project. BPA shall increase base funding proportionate to the stream miles/acres protected.

Rationale:

Currently, BPA is achieving habitat mitigation through multiple vehicles. Some agencies and Tribes are successful in negotiating long-term settlement agreements whereas others mitigate in increments through 2-5 year MOA's or MOU's. One size does not fit all. The Program should accommodate and BPA shall fund whatever type of agreement fits the parties involved as long as mitigation is successfully being attained.

The Program often makes long term investments to mitigate the impacts of the hydrosystem. Responsible ownership of real property involves stewardship of the attendant natural resources. Accordingly, such responsible ownership requires funding for operations and maintenance. Regardless of the type of real property interest acquired, each capital investment made under the Program for the purpose of habitat acquisition/protection shall include an endowment or other long term funding for the purpose of supporting the operations and maintenance activities necessary to perpetuate the attendant habitat functions and values. Therefore, BPA shall fund reasonable (current market value) long-term operations and maintenance activities and not rely on existing stagnant budgets to accommodate these needs whereby other mitigation actions do not get accomplished.

Address the Threat of Climate Change to Resident Fish

Current Program: Page 22-23, Resident Fish Mitigation

Measure: BPA should fund perpetual land protection which includes conservation easements, land purchases, or other long term measures to combat climate change impacts on resident fish.

Rationale and proposed Program language to be added to Section 7 of Basinwide Strategies on Page 22:
"Climate change threatens the existence of native resident fish in the Columbia basin. The ISAB directs the Council to consider requiring project proposals and management plans to consider the potential impact on project outcomes of climate change and its associated variability and uncertainty. Perpetual land protection efforts are one of the most effective ways to combat climate change. By protecting and restoring key habitat features such as riparian shading, channel morphology and improved base flows, population resiliency increases. Targeting those parcels with the combination of connectivity and intact healthy riparian and stream habitat will give those systems more resiliency as climate change and variability take effect."

Address Management of Non-natives as Resident Fish Mitigation

Current Program: Page 22-23, Resident Fish Mitigation

Measure: BPA should fund efforts to address all primary limiting factors affecting resident fish including non-native species eradication and suppression and coordinate these efforts with companion efforts that protect anadromous fish from non-native species.

Rationale and proposed Program language to be added to Section 2 and/or Section 7 under Basinwide Strategies: *"The threat of non-native species increasingly complicates the protection, restoration, and enhancement of resident fish species throughout the basin. Competition, predation and hybridization by non-natives often reduce the effectiveness of habitat protection and restoration efforts for native fish populations. Funding should be directed to treat the problem, not the symptoms, including research to better understand food-web interactions. Where non-native species have been identified as a primary limiting factor in subbasin plans, increased effort and funding should be directed to eradicate or suppress non-native species in conjunction with the proven methods that benefit their habitats."*

Resident Fish Loss Assessments

Current Program: Page 22-23, Resident Fish Mitigation and Crediting

Measure: BPA should fund the Agencies and Tribes to develop a methodology and complete resident fish loss assessments. The selection of a method should be at the discretion of the entities involved in performing the survey; however, to standardize the process and ensure a consistent level of accuracy across the basin the Council should form a workgroup of resident fish managers to address this issue. A framework for assessing resident fish losses shall be in place by 2015 with assessments initiated that same year.

Rationale: The Northwest Power and Conservation Council's (Council) amended Fish and Wildlife Program (Program) provides for resident fish mitigation "where construction and inundation losses have been assessed and quantified by the appropriate agencies and tribes, mitigation should occur through the acquisition of appropriate interests in real property at a minimum ratio of 1:1 mitigation to lost distance or area." Despite the mitigation provisions, the Program does not prescribe specific methodology for the calculation of lost resident fish habitat due to construction and inundation. Because of this omission, resident fish managers (i.e., Columbia Basin Fish and Wildlife Authority's (CBFWA) members and non-members) in the Columbia River Basin, working through the CBFWA Resident Fish Advisory Committee (RFAC), developed a methodology to allow for the consistent quantification of inundated resident fish habitat (CBFWA Members Action Notes, October 7, 2009).

The CBFWA sent a letter on October 8, 2009 to the Council suggesting a recommended methodology to calculate the amount of resident fish habitat that has been inundated by the construction of the Federal Columbia River Power System. The inundation methodology could serve as the foundation for future identification of operational losses. The Council should develop and adopt a standard methodology through a public process that includes independent science review and the participation of the resident fish managers throughout the Columbia River Basin.

3. Species Focused Recommendations

Species recovered in the context of the ecosystem

The ISAB provides six new principles that are intended to replace the original eight principles on page 9-10 of the current Program, while retaining most of the original content. They are structured to express the theme that sustainability can be enhanced in two ways: first, by building resilience to reduce the probability that an ecosystem will cross a "tipping point" and shift into a new regime; and second, by building adaptability to improve outcomes when such regime shifts do occur. The latter concern is especially relevant in the Columbia River Basin in the face of climate change, human population growth, proliferation of chemicals, hydrosystem development, and the emergence of hybrid food webs due to the spread of non-native and artificially propagated species. (ISAB 2013-1)

The development and operation of the hydropower system has such an impact on the Columbia River ecosystem, that its affects cannot be separated or isolated from the other

landscape scale impacts to the system. Addressing one part of the system impacts successive elements and therefore, mitigation actions need to be considered in this larger context. The Council's Program needs to take a larger vision of the entire system in order to prioritize strategies, rather than treating the symptoms or individual elements. The recommendations in Section 2 of this document, explicitly identifying limiting factors and strategies to address them, would help in aligning the individual actions and assessing the effectiveness of specific strategies in a holistic context.

Integration with Endangered Species Act

Current Program: Pages 3-4, The Program Framework, and throughout

Recommendation: Maintain the current language under Objectives for Environmental Characteristics, page 13, expressed in the 2009 Program with modifications shown here in bold:
"~~***Allow for biological diversity among and within populations and species***~~ ***Promote the increase of biological diversity among and within populations*** *to increase ecological resilience to environmental variability."*

Recommendation: Maintain the current language under Habitat Protection and Improvement Activities to Address Biological Objectives, page 16, expressed in the 2009 Program with modifications shown here in bold:
"*Habitat work is intended to be consistent with the Program's biological objectives and also with measures contained in subbasin plans* ***and ESA recovery plans****."*

Rationale: These recommendations encourage the Council to incorporate ESA goals and objectives for recovery and delisting of threatened and endangered species into the Fish and Wildlife Program. In most cases, ESA delisting is not an ultimate goal and Fish and Wildlife Program goals should exceed and be broader than achieving ESA delisting. However, for listed species, ESA delisting should be an intermediate step towards the Fish and Wildlife Program goals. At any rate, the Council should clarify that a) ESA recovery and delisting is consistent with Fish and Wildlife program goals and b) actions to achieve Fish and Wildlife Program goals should not impede ESA delisting.

Integrate Climate Change

Current Program: Page 51 – 52, Climate change planning considerations

Measure: Develop a comprehensive strategic plan to address the potential impacts of climate change on the entire system, including the estuary and the ocean and develop a suite of strategies within the amended Program and fund implementation of strategies. (ISAB 2013-1)

Recommendation: Review current restoration or habitat projects to ensure their resiliency under predicted future climate scenarios to ensure that investments made today are effective into the future.

Recommendation: Require project proposals and management plans to consider the potential impact on project outcomes of climate change and its associated variability and uncertainty. (ISAB Program Review, March 7, 2013)

Rationale: Considerable efforts have been made in the Columbia Basin to develop, implement and evaluate strategies to protect and restore populations of salmon, Pacific lamprey, and resident fish and wildlife, but most of these efforts have generally not addressed climate change impacts and adaptation to these impacts. Climate change is expected to significantly alter the ecology and economy of the Pacific Northwest during the 21st century (Mantua et al. 2009; Schnorbus et al. 2011). Rising air temperatures and erratic changes in precipitation patterns are expected to decrease snowfall and increase rainfall during the winter months, leading to shifts in the timing and quantity of runoff, including increased flooding during the winter when water is already in ample supply, and decreased flows during the summer when water demands are high. These changes will have significant impacts for freshwater and marine fisheries, hydropower production, flood risk management and water supply for agriculture and municipal uses. The impacts from climate change affect fish and wildlife in a number of ways. Some examples include migration patterns being altered, spawning and rearing grounds degraded, dramatic increases in poor habitat and loss of water quality and the increase of predators, aquatic contaminants and invasive species (Mantua et al. 2010). Any of these factors could, if not addressed, lead to species extinction.

In addition, particularly in the summer, other human water uses will create intense competition for limited water supply and will thus tax fish populations that are already in a precarious status. Thus, the human dimensions of climate change must be integrated into consideration of climate change impacts and adaptation on basin ecosystem function (Miles et al. 1999).

Implement Predator Control

Measure: BPA (and action agencies) should work cooperatively with NOAA Fisheries, USFWS, states, tribes and the Council to develop and implement system wide strategies to manage and reduce non-native fishes that compete and feed on native fish in mainstem and in tributaries. This also applies to section II.D.2 Non-Native Species Strategies, page 18.

Rationale: The Program, as currently implemented by BPA, is anadromous fish centric and should more strongly consider impacts to native resident fish. The program seems to call out or emphasize focus on several non-native species, but this focus should not de-emphasize the need to address other non-native species in the Basin that have an effect on native fish populations (e.g. lake trout, northern pike, white crappie, yellow perch, etc…).

- Non-native fish have significant negative effects on native resident fish species

- Northern pike have greatly reduced native fish populations in the Pend Oreille system
- Walleye and smallmouth bass have reduced native resident populations in Lake Roosevelt
- Relative abundance of smallmouth bass has nearly doubled in areas of John Day Reservoir in recent years and this may influence predation on juvenile salmonidsCompetitive interactions between northern pikeminnow and smallmouth bass, may cause a shift in northern pikeminnow diets and habitat use, which could in turn exacerbate predation on juvenile salmonidsThe decades of emphasis on northern pikeminnow control has narrowed piscivorous predation to a singular focus with very little emphasis on baseline studies on populations, habitat use, and diets in the mainstem and major tributaries
- White crappie predation on juvenile spring Chinook salmon in Lookout and Hills Creek reservoirs may significantly increase mortality rates
- Lake trout threaten bull trout and other native trout in areas where lake trout have been introduced into native trout habitat
- The Program should support, and BPA should fund, additional research into the overall magnitude of the impacts of non-native predators including studies on abundance, movement and habitat use, and food web interactions in order to help guide improved management of non-natives.

Prevent Establishment of Aquatic Invasive Species

Current Program: Page 18, Non-Native Species Strategies

Measure: In order to protect the federal Columbia River Power System assets, the Northwest Power and Conservation Council's Fish and Wildlife Program should direct the Bonneville Power Administration (BPA) to provide proportionate funding for prevention activities that are known to be effective at stopping the invasion and spread of zebra and quagga mussels, and invasive aquatic plants such as Eurasian milfoil and flowering rush. Funding should be equally provided through the Program and Operations and Maintenance budgets from Power Operations within BPA. These activities include, but are not limited to, inspection and decontamination of boats moored in infested waters and then transported on our roadways in the region.

Recommendation: The Northwest Power and Conservation Council should continue to play a regional leadership role in coordinating stakeholder groups around the issue of aquatic invasive species, particularly those that pose the greatest risk to the Columbia River Basin ecosystem and industries. In particular, the Fish and Wildlife Program should include specific language supporting the work of the 100th Meridian Initiative Columbia River Basin Team, which is coordinated by the Pacific States Marine Fisheries Commission. This group has provided strong, successful leadership on invasive species prevention efforts in the region. We recommend the Council ask for regular reports from 100th Meridian Initiative Columbia River Basin Team on the following items:

1. Current efforts for inspection and decontamination

2. Research priorities relative to invasive species control and prevention
3. Opportunities for collaboration and lessons learned

Rationale: The Council must shift its current BPA funds from population control research to infestation prevention. It is imperative that the Region prevent further degradation of ecosystem function and to ensure protections for species recovery investments, water delivery infrastructure, and hydropower production from the potentially devastating impacts of invasive species, such as the infectious salmon anemia virus, zebra and quagga mussels, etc.. Our recommendations relate to increased funding for enhanced inspection and decontamination efforts in the region, stronger measures to prevent the inadvertent spread of invasive species resulting from habitat research and restoration activities, and maintaining the Council's leadership role as the key convener and coordinator in the Columbia Basin for science, policy and outreach.

Review Implementation of Program Measures

Current Program: Page 63, Program Reporting

Recommendation: The Council should work with fish and wildlife managers and partners to provide a periodic review of implementation of Fish and Wildlife Program measures and provide an annual report of the measures that were implemented and those which were not. In addition, because of the importance of Subbasin plans, progress towards implementation of these plans should be reported on periodically. This could be as simple as documenting which measures are currently funded and those which have not been funded.

Rationale: We recommend that the Council reassert their role, as described in the Power Act, to provide direction regarding funding levels to BPA. In addition, the Council should use existing tracking tools to report on which elements of the Program are funded (and at what level) and which are currently unfunded. As new measures are added to the Program, funding mechanisms need to be identified. To address the need for new funding, we recommend that the Council use their convening role to coordinate and leverage funding for new and existing measures in the Program.

- The Council's Program, though tied to ESA listed species, is broader than recovery of those species.
- Effort and funding needs to be balanced within the Program to ensure that all aspects of the Program move forward within the foreseeable future, though perhaps not within the next five years.
- The Council can uniquely address the needs of the ecosystem from the sub basin or basin wide perspective.
- BPA has large discretion regarding funding levels, but the measures listed in the Program are presumed to be funded, at some level. Tracking of these measures needs to be transparent.
- In addition, it is critical that the cost of administering the Program be kept low. It is important that in an annual review of implementation, an accounting for Program administration costs be reviewed, as well.

Re-Establish a Regional Coordination Forum

Current Program: Page 64, Program Coordination

Recommendation: Council should continue as a regional convener of issues related to the Columbia Basin mitigation. Council should create an annual forum for states, tribes and partners to coordinate and discuss annual work priorities. The forum would result in the creation of an annual work plan to ensure that we are collectively engaged in discussions on what is most important to the Council and the region. Through the five years of this program, we recommend the following priority topics, as others as they arise, for Council engagement:

- Monitoring and Evaluation – In order to get a handle on M&E costs within the Program, specific information needs at each level of Program reporting should be clearly identified and incorporated to ensure cost effective and efficient data collection, data management, and data sharing.
- Research - What are the critical questions we need to answer? How do we improve reporting and integration into decision making? How can we improve funding mechanisms such that research projects are finished and new projects are identified?
- Wildlife Mitigation – moving into the future, how do we ensure continued value of BPA investments?
- Zebra and Quagga Mussels – focus on prevention.
- Habitat Restoration – How can we leverage existing projects to understand effectiveness of habitat restoration on populations?
- Science/Policy forums – variety of topics including climate change, toxics, eulachon
- BPA funded assets – What are the long term challenges of maintaining BPA funded infrastructure and how can we begin addressing them?
- Non-native species – suppression and eradication; where successful, where not: need to keep lines of communication open
- Coordinated Assessments – identify additional species for process

Rationale:

- The role of the Council has evolved over time to meet the needs of the Basin and to address endangered species listings in concert with BPA.
- The disbanding of CBFWA leaves a gap in regional coordination as no one state or tribe can play a regional coordinating role, with the consequence that States and Tribes work more directly with Council Members.
- As such, it falls to the Council and Council staff to play a greater coordinating role that meets the needs of all regional partners in serving and informing Council decisions.
- An annual work plan would provide sufficient advance notice to improve preparation and participation, ensuring that all parties benefit fully from the exchanges.

Recommendation: We recommend that the Council continue the inclusion of Fish and Wildlife Program Coordination funding in the updated program amendment process. Program Coordination funding is important to the region's fish and wildlife managers, particularly for the Columbia River Basin's Tribes. The lack of any Columbia River Basin fish and wildlife entity to provide this basis for coordination makes it more critical to provide funding directly to those individual state and tribal managers who can provide their time and expertise. This coordination funding is also important for many of the tribes because it helps build capacity and levels the playing field, particularly for smaller tribes across the basin. It allows for important avenues for participation and travel to meetings, efforts that would not occur without this level of funding support.

Rationale: The current 2009 Council Fish and Wildlife Program describes the need for coordination funding provided by BPA for the purpose of various activities that support Program implementation. Activities range from activities such as data management and reporting, monitoring and evaluation, facilitating and participating in focus workgroups on Program issues, review of technical documents and processes, and information dissemination.

The Council in 2012 reviewed coordination projects and provided a decision on BPA coordination funding. In that decision document the Council included a table of detailed coordination activities appropriate for BPA funding. Those coordination tasks were designated by the Council as meeting priority needs for program coordination for the next two years, FY2013-2014. With this decision the Council indicated that these activities were well suited for program-level regional coordination funding and recognized that they would need the assistance from partners throughout the region. In addition the Council stated that all of the work was intended to be of benefit at a basinwide or regional scale and should inform the Council for policy, program performance evaluation, and implementation decisions. The Council also recommended that this work should be accomplished by the appropriate fish and wildlife agencies and tribes recognized in the program and other entities such as Tribal Consortia that have the experience and capacity to coordinate this work at a basinwide scale.

NPA. Section 839b(h)(2)(C). [The Council shall request…] fish and wildlife management coordination and research and development (including funding) which, among other things, will assist protections, mitigation, and enhancement of anadromous fish at, and between, the region's hydroelectric dams.

References

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