



LOWER COLUMBIA FISH RECOVERY BOARD

2127 8th Avenue Longview Washington 98632

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Jeff Breckel
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April 3, 2008

Mr. Steve Crow
Executive Director
Northwest Power and Conservation Council
851 SW Sixth Avenue, Suite 1100
Portland Oregon 97204

Dear Mr. Crow:

The purpose of this letter is to respond to the Council's request for recommendations to amend the Columbia Basin Fish and Wildlife Program (Council Document No. 2007-17).

The Lower Columbia Fish Recovery Board (LCFRB) is one of four Washington regional salmon recovery organizations in the Columbia Basin. It was established by Washington statute (RCW 77.85.200) in 1998 to coordinate efforts to recover ESA-listed salmon and steelhead in the lower 150 miles of the Columbia River and its Washington tributaries. The Board's goal is to return salmon and steelhead populations to healthy, harvestable levels.

In collaboration with federal and state agencies, tribes, local governments, business and environmental interests, local communities, and people of the lower Columbia, the LCFRB has completed and is working to implement:

- The Lower Columbia Salmon Recovery and Fish and Wildlife Subbasin Plan. The Council adopted the plan in 2005 as the Fish and Wildlife Program Subbasin plans for 8 subbasins. The National Marine Fisheries Service adopted the plan in February 2006 as an interim Lower Columbia recovery plan for Chinook, chum, and steelhead.
- Watershed plans pursuant to the State Watershed Management Act (RCW 82.). The Washington counties in the lower Columbia adopted the plans in July 2006. These plans address water quantity, water quality, stream flow and salmon habitat needs and complement the recovery and subbasin plans.

Success in recovering Lower Columbia salmon and steelhead populations will require a sustained, cooperative and coordinated effort by federal and state agencies, tribes, and local governments, operating within their established responsibilities and authorities. In this context, the Council and BPA are key parties to Lower Columbia recovery efforts. The Columbia Basin Fish and Wildlife Program, and associated Subbasin plans play a fundamental role in defining agencies' obligation and contribution to the overall recovery effort.

Our attached recommendations focus on Certain Basin-Wide Strategies and Subbasin Plans and, in particular, on areas where opportunities exist to further

To: Steve Crow
Fm: George Trott, LCFRB
Re: Fish and Wildlife Program Amendments
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integrate and strengthen the Council's Columbia Basin Fish and Wildlife Program and Lower Columbia salmon and steelhead recovery efforts. We have also consulted with the Washington Governor's Salmon Recovery Office (GSRO) and the other Washington salmon recovery organizations in the Columbia Basin. These include the Snake River Salmon Recovery Board, the Upper Columbia Salmon Recovery Board, and Yakima Basin Fish and Wildlife Recovery Board. We concur with the GSRO comments on needed amendments to Columbia Basin Fish and Wildlife Program and we believe our comments complement those being provided by the other regional salmon recovery organizations.

We appreciate this opportunity to provide our recommendations on amendments to the Columbia Basin Fish and Wildlife Program and look forward to working with the Council to achieve the mutual goals of the Program and the Lower Columbia salmon and steelhead recovery plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "George Trott", with a long horizontal flourish extending to the right.

George Trott, Chair
Lower Columbia Fish Recovery Board

Cc: LCFRB Members

Lower Columbia Fish Recovery Board
Recommendations on Amendments
to the
Northwest Power and Conservation Council
Columbia Basin Fish and Wildlife Program

March 27, 2008

1. Recognition of Salmon Recovery Plans

The National Marine Fisheries Service (NMFS) has formally adopted recovery plans developed by Washington's four regional salmon recovery organizations in the Columbia Basin. The Washington Lower Columbia recovery plan¹ also serves as the Council's Fish and Wildlife Subbasin plans for 8 subbasins. The recovery plan was adopted by NMFS in February 2006 as an interim recovery plan for Chinook and chum salmon and steelhead pending the completion of the plan for Oregon's portion of the Lower Columbia ESUs. The Council adopted the plan in 2005.

The Lower Columbia Plan was developed and is being implemented through a collaborative effort led by the Lower Columbia Fish Recovery Board (LCFRB) and including federal and state agencies, tribes, local governments, business and environmental interests, local communities, and people of the lower Columbia. It is an integrated all "H" (habitat, harvest, hatcheries, hydro) plan setting forth goals, strategies, measures, actions and priorities. The cooperation and support of the Council and the Bonneville Power Administration (BPA) are important to the successful implementation of the plan and the recovery of salmon and steelhead to healthy, harvestable levels.

Recommendations:

1. The Columbia Basin Fish and Wildlife Program (Program) should continue to recognize the Lower Columbia Salmon Recovery and Fish and Wildlife Subbasin Plan (the Plan)(LCFRB 2004) as the authoritative framework for salmon and steelhead recovery efforts in the Lower Columbia. The Program should use the Plan and associated implementation documents, such as the 6-Year Habitat Protection and Restoration Schedule, to identify, evaluate, rank, and fund research, monitoring, hatchery, and habitat actions and projects.
2. In recognizing the Plan as the authoritative framework for recovery efforts, the Program should include provisions to ensure that the Plan and Program remain consistent and do not diverge over time potentially resulting in conflicting goals, strategies, measures, actions and priorities. This is particularly important in the near-term. For example, within the next year the Washington Lower Columbia Plan will be revised to serve as the recovery plan for coho, in addition to Chinook, chum, and steelhead. It will also be merged with the Oregon recovery plan currently under development to create a bi-state recovery plan for Lower Columbia ESUs/DPS in late 2008 or early 2009. Further, NMFS is currently engaged in the adoption of the Columbia River Estuary Recovery Plan Module. When adopted later 2008, the module will be part of all Columbia Basin recovery plans. It builds and expands upon the estuary and lower Columbia, and estuary subbasin plans providing a more comprehensive framework for recovery actions.

¹ Lower Columbia Salmon Recovery and Fish and Wildlife Subbasin Plan, LCFRB 2004

Finally, the Program should include update provisions linked to recovery plan review and adaptive management processes. Each of the Washington regional salmon recovery organizations has provided for an adaptive management process in their respective recovery plans. Coordination of Program reviews and updates with recovery plan adaptive management processes will ensure the two remain consistent over the long-term.

2. Research, Monitoring, and Evaluation

A technically sound research, monitoring and evaluation (RME) program is essential to assessing progress and sound decision-making over the long-term. RME efforts can also be very costly. The LCFRB and the other Washington regional salmon recovery organizations are leading efforts to develop effective, cost efficient monitoring programs. The Lower Columbia Salmon Recovery and Fish and Wildlife Subbasin Plan sets forth the framework for a collaborative RME program that would meet the varying needs of multiple resource managers in the most efficient manner possible. The LCFRB is currently working with federal and state agencies and local governments to develop a RME program based on the Plan's framework. This effort is also being conducted in coordination with the Washington Forum on Monitoring Salmon Recovery and Watershed Health (Monitoring Forum) and the Pacific Northwest Aquatics Monitoring Partnership (PNAMP). The RME program encompasses biological and habitat status and trends, project effectiveness, and plan implementation status monitoring, performance benchmarks, and evaluation processes. Implementation will focus on coordinating and integrating monitoring needs and efforts of the participating agencies and local governments to avoid duplication and control costs. However, success of the RME program will be dependent on the long-term commitment of the participating agencies and governments.

In addition to monitoring needs, the Plan identifies critical uncertainties and associated research needed to support sound decision-making. The objective of the Plan is to establish a technically sound research agenda that can be used by federal and state agencies, tribes, and local governments to coordinate research efforts and make needed information available to decision-makers. The Columbia River Estuary Recovery Plan Module being considered by NMFS further addresses research needs for the lower Columbia and Estuary. Use of the guidance in these documents can help to ensure that funding is focused on high priority research needed to support critical decisions.

Recommendations:

- The Program should provide for Council and BPA cooperation and participation in working with Washington's Columbia Basin regional salmon recovery organizations to develop and implement recovery plan RME programs. To this end, the Council and BPA should identify the monitoring needs to satisfy their mitigation and ESA obligations, work to integrate their needs into the regional programs, and participate in establishing data management and communication mechanisms. Additionally, the Program should make a long-term commitment to participate in and fund monitoring activities relevant to the needs of the Council and BPA.
- The Program should adopt the research needs and priorities identified in the recovery plans. The Lower Columbia RME program will further refine these needs and along with the Columbia River Estuary Recovery Plan Module should be used as the research agenda for the Lower Columbia River and Estuary.

3. Implementation Coordination and Project Review

Successful implementation of recovery plans will require a sustained and coordinated effort among federal and state, tribal, and local recovery partners. The LCFRB has developed strong working relationships with its recovery partners. It has also put in place measures to coordinate and track regional recovery efforts by the implementing partners. The LCFRB is working with its partners to assist them in developing recovery implementation plans and schedules. Individual agency, tribal, and local government Implementation Work Schedules (IWS) will be combined and integrated to provide a comprehensive regional recovery "6-year implementation work schedule". The LCFRB and its Recovery Plan Implementation Committee will use this work schedule to coordinate and track recovery efforts and projects.

Recommendations:

- The Council should commit to participate in the Lower Columbia salmon recovery partnership in implementing its recovery related strategies, programs and projects, including research, monitoring and evaluation, project review and funding, hatchery operations and funding, and implementation tracking.
- The Council should enter into a formal relationship with the LCFRB for upcoming project funding rounds. This relationship would provide for an LCFRB coordinated review of proposed projects for consistency with recovery plan and Subbasin goals, strategies, measures, actions and priorities.

4. Columbia Basin Hatchery Review

Hatchery and harvest strategies, measures, actions, and priorities are integral elements of the Lower Columbia Salmon Recovery and Fish and Wildlife Subbasin Plan.

The Hatchery Scientific Review Group (HSRG) is developing recommendations for ensuring that hatchery practices and related harvest management decisions are consistent with recovery goals and implementation of recovery plans for ESA-listed and non-listed salmon and steelhead populations in the Columbia Basin. The LCFRB is participating in this review. Draft reviews for Lower Columbia Chinook and coho have already been completed. The final HSRG recommendations will likely be completed by the end of 2008, and their recommendations will be considered by the co-managers in efforts to improve current hatchery facilities and practices where needed.

Recommendation:

- The Program should commit to adopt the HSRG recommendations and co-manager implementation measures to the extent they are consistent with the Lower Columbia and other Columbia Basin recovery plans and Hatchery and Genetic Management Plans (HGMP) approved by NMFS. In the Lower Columbia, the recovery plan consistency review should be coordinated through the LCFRB.