



NATIVE FISH SOCIETY

Advancing the Recovery of Native, Wild Fish in Their Homewaters

March 10, 2016

Northwest Power Planning and Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, OR 97204-1348

Re: Comments on Critical Uncertainties, ISAB/ISRP 2016-1, January 29, 2016

The document on Critical Uncertainties identifies important biological and social issues relevant to the conservation, management and recovery of salmonid populations protected by the Endangered Species Act in the Columbia River Basin.

If I were a council member my first question regarding the critical uncertainties document would be “what do I do with this?” There is no plan provided for dealing with the critical uncertainties identified in the document. Therefore, my first comment is that the ISAB/ISRP should provide the council members with a plan to address these critical uncertainties since they are fundamental to the council’s fish and wildlife program and its success.

I recognize through my participation in fish and wildlife programs since the Council was formed that programs adopted by the council members are treated as electives by the state, federal and tribal agencies. This was highlighted by Lichatowich and Williams (2009) and prior to the adoption of the 2014 fish and wildlife program by the ISAB (2013-1). The issue presented to the Council emphasizing the need to align the fish and wildlife program with an ecological rather than production priority to protect and recover Columbia Basin salmonids. “The ISAB suggests a revised focus on sustainability with strategies to protect diversity and resilience, and to build adaptability.”

The ISAB/ISRP critical uncertainties presentation is consistent with the earlier documents presented to the Council, but these recommendations need to be applied in watersheds and evaluated. Therefore, I am requesting that the Council ask the ISAB/ISRP for a plan to address critical uncertainties and implement an ecologically based conceptual foundation for protection and recovery of wild salmonid populations in the Columbia River Basin and to fund it. This would not be treated as an elective at the discretion of the fish agencies and tribes, because it would be designed and funded by the Council and BPA. The fish agencies and tribes could participate in the implementation of this plan directed by the ISAB/ISRP. By taking this action the Council would be able to actually develop a way forward for recovery of wild and ESA-listed salmonids, an action that has so far been thwarted by other institution interests.

Sincerely,

Bill Bakke, Founder and Conservation Science Director