



March 10, 2016

Mr. Henry Lorenzen, Chairman  
Northwest Power and Conservation Council  
851 SW Sixth, Suite 1100  
Portland, OR 97204

Dear Mr. Lorenzen:

RiverPartners appreciates the opportunity to comment on the ISRP and ISAB's "Critical Uncertainties" report. RiverPartners represents farmers, ports, utilities and large and small businesses and industries, all of whom rely on the Columbia and Snake River dams and federal hydro system for economic and environmental benefits. The report is a comprehensive and thoughtful piece of work and we appreciate the scientists' efforts. The Council and its staff now face the formidable task of taking the report and developing a more focused RM&E plan that comports with the vision and mandates of the Northwest Power Act (Act).

It is a daunting undertaking but necessary. RM&E ostensibly accounts for between 40-50% of the regional fish and wildlife Program and this is clearly too high. Too many stakeholders view the Bonneville Power Administration (BPA) as a convenient funding mechanism for their own programs and mandates, particularly as mandates grow and financial resources dwindle. BPA has recognized its situation is a precarious one unless it manages its costs aggressively and sets realistic expectations, as evidenced by its Focus 2028 initiative.

We recognize and appreciate the effort the Council launched and is pursuing, with BPA, to find cost savings in its fish and wildlife Program. You are on the right track! As you continue with this effort, we urge you to apply savings to reduce overall fish and wildlife costs, not just fund new or higher priority measures. Consideration needs to be given to reducing the overall size of the Program, as projects close-out or are no longer needed, particularly in light of BPA's competitiveness issues.

A similarly disciplined approach is needed as the Council develops its Research Program. The Program's research priorities must be narrowly focused on the development of scientific knowledge that has a nexus to the statutory mandates in the Northwest Power Act. Broadly stated, this means a focus on answering the questions critical to insuring that the most biologically and cost effective measures are being implemented to address the impacts of the FCRPS on fish and wildlife.

The first step is to establish clear priorities for RM&E in the Fish and Wildlife Program. This sounds straight forward but we recognize it is extremely challenging. The Critical Uncertainties report provides the Council an incredible range of alternatives for future research. It will be extremely difficult for the Council and its staff to sort through this list and decide what really is most important, what can wait and what is outside of the scope of the Act.

Recognizing this, we have offered some principles that we think should be used to make future RM&E decisions based on this report and other information before the Council:

### **Principles for Establishing Research Priorities:**

- Degree to which it will focus resources on mitigating for FCRPS impacts
- Economic feasibility within current BPA fish and wildlife budgets
- Ability to provide useful information within a relevant management decision timeframe
- Probability that the research will successfully aid in Council decisions
- Ability of the research to help estimate the biological impacts of BiOp measures
- Research that will help to determine the biological cost-effectiveness of measures

We have not attempted to apply these principles to the plethora of research areas proposed in the Critical Uncertainties report. However, as we review the research recommendations in the report, we find some areas to be clearly outside of the scope of the Fish and Wildlife Program while others fit within it. Here are a few examples.

### **Report Recommendations Outside Program Scope:**

- **Improve communication on research issues and results** – We have difficulty seeing this as a “critical uncertainty”. Clearly, more communication and public involvement is a good thing, but there must be limits and we question, in some areas, if this is really the Council’s role. Frankly, the general public is not interested in “critical uncertainties” or fish and wildlife research – other scientists, implementers, and decision makers are.

The Corps has a major review of Corps funded research each year and a better approach might be to expand that process to include more research projects and data sharing with the federal, state and tribal parties and stakeholders that need and are truly interested in the information.

- **Improving the rigor, consistency and availability of annual reports, convening workshops or symposia** – The Council has had and should continue to hold workshops and symposia as needed to address key areas of research. However, these areas need to be focused on the scope of the Program and not open ended as described in the report. It is not the Council’s role to be the scientific conference organizer for the region.

- **Take climate change and human development into account** – We support incorporating the impacts of climate change in long-term investments like hatcheries, which will be in place for years. However, much of the Program is adaptable and, given the long-term nature of climate change, can be modified as conditions in the region change. We also fail to see why the broad historical, current and future impacts of “human development” have anything to do with mitigating the impacts of the FCRPS.
- **Research to determine the threats of toxic contaminants** – The region is becoming increasingly aware of the enormous scale of the toxic contamination problem. However, most contaminants and their sources are unrelated to the existence and operation of the FCRPS and are the legal obligation of other entities: Environmental Protection Agency and the states. For this reason, we believe that the Program should focus on those contaminants that are directly attributable to the FCRPS.
- **Research into management of non-native species** – Again, we question the nexus with the FCRPS. There are numerous non-native species that were introduced by humans or have found their way into the region’s waters, but the FCRPS has had nothing to do with the existence of these species. We recognize that the reservoirs created by the FCRPS provide habitat for many of the non-native species, but we fail to see why their introduction by others or their management as important game species is the responsibility of the Council or BPA under the Act.
- **Recognize that many years of careful monitoring are typically required** – While this recommendation is obviously true, it directly limits the Program’s flexibility to make changes. This could serve to undermine the entire concept of “adaptive management” because if change must await scientific and statistical confidence, there will be little ability to actively manage the Program. We suggest that while this is an important understanding by the Council, it should not be an excuse to not make changes when better, higher priority measures are found.
- **Lower Columbia River, estuary, ocean plume, and ocean research** – This area of research, while important in a global sense, has little connection to the FCRPS and the mandates of the Act. As the Council is well aware, the only significant measure the Council has decided should not be funded was an ocean survival research project because it lacked a clear connection to the FCRPS.
- **Rigorous monitoring and evaluation programs** – This is important and obvious coming from scientists, but it must be balanced with improving the percentage of the overall Program that actually results in on-the-ground measures with the potential to provide biological benefits. Too much RM&E is good for science but not necessarily good for fish and wildlife.

## Report Recommendations Within Program Scope:

- **Identify thermal refuges** – This research is important given the warm water conditions that were seen in the region’s rivers last year, and we know that the Council is currently investigating this area of research. This uncertainty relates to and helps address climate change concerns directly. The challenge for the Council is to prioritize this area of research within the entire Program and, if necessary, cut funding of other research in order to support thermal refuge work within the current budget.
- **Continue research on artificial propagation** – We believe this to be a high priority area for the Program’s research because this topic is currently highly uncertain and there is much scientific, policy and legal debate about what the appropriate role of the region’s hatcheries should be, given the critical importance of ESA listed species.
- **Research on population structure and genetic diversity of focal species** – This is an important area of research because, given NOAA’s Viable Salmonid Population (VSP) paradigm, this information will be necessary to ever remove any listed fish from the ESA protections.

Thank you for the opportunity to comment. We hope we have provided you with some ideas and food for thought that will be helpful as you undertake, with your staff, the difficult task of establishing RM&E priorities. We stand ready to help in any way we can.

Sincerely,



Terry Flores, Executive Director

Cc: NPCC Members  
Tony Grover, NPCC  
Lorri Bodi, BPA  
Peter Cogswell, BPA  
Bill Maslen, BPA