

March 25, 2008

APR 03 2008

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

2008003038

Dear Mr. Crow:

In response to the Council's request for recommendations to amend its Fish and Wildlife Program (Council document No. 2007-17), the Snake River Salmon Recovery Board (SRSRB) respectfully submits this letter for Council's consideration. Our comments are focused on Certain Basin-wide Strategies and the 2003 mainstem amendment.

Our recommendations below seek to:

1. Include an adaptive management architecture as the framework of the program;
2. Implement the Fish and Wildlife Program (Program) consistent with the approved Snake River Salmon Recovery Plan (December 2005);
3. Increase efforts to monitor and evaluate implementation actions and results;
4. Develop consistency and collaboration in program implementation and data management; and
5. Emphasize needed survival improvement in the mainstem Snake and Columbia rivers.

It is noteworthy to point out that our recommendations seek to achieve many of the same objectives as requested by the Upper Columbia Salmon Recovery Board, Yakima Basin Fish and Wildlife Recovery Board and the Lower Columbia Fish Recovery Board. These Boards were vested in development of the subbasin and recovery plans, represent those with the authority to implement the habitat elements of the plans, are supported by science teams and have a mission to restore viable and sustainable populations of salmon through collaborative, wise resource management in their respective regions.

Certain Basin-wide Strategies

Adaptive Management Framework

To provide a basis for appropriate project selection and funding, the Council should utilize a collection of various "status of the resource" documents and subbasin and recovery plans to feed an adaptive management decision framework. The following adaptive management elements should drive this framework: fish population status, population objectives, gaps between status and

Voting Board Members:

Cathy Schaeffer, Yancey Reser, Stuart Durfee, Dick Ducharme, Dick Jones, Vacant, Doug Mattoon, Jay Holzmilller, Dick Isaac, Confederated Tribe of the Umatilla Indian Reservation, Butch Klaveano, Gary Cole, Del Groat, Michael Largent, Ed Schultz

31

objectives, limiting factors and threats that create the gaps, and finally the necessary strategies and measures to address the gaps. Monitoring and evaluation should be utilized to evaluate implementation of measures and continue to track population status and needs. Each of these steps will be necessary to support a transparent, accountable, and effective planning, implementation and evaluation process. Through this framework, the fish and their habitat would be the foundational source used by the Council to inform project selection and funding decisions.

Program Implementation

The SRSRB approved the subbasin plans that were developed for the Asotin, Tucannon, Walla Walla and lower Snake subbasins. Since then, the SRSRB has developed the Snake River Salmon Recovery Plan, which incorporates elements of these sub-basin plans and then builds on the assessments completed in those planning processes to address the ESA de-listing criteria developed by NOAA Fisheries. This additional assessment provided the region with prioritized actions and areas, a critical step for critically guiding investments in the region. This means that the assessment, goals and objectives in the recovery plan for ESA-listed salmonids should be referenced in the amendment as enhanced information to that in the subbasin plans. The objectives and subsequent strategies and actions in the recovery plan are designed to protect, mitigate and enhance anadromous fish populations, a goal that the Program seeks to achieve.

As a result of completing a regional salmon recovery plan we now have an improved assessment, refined goals, objectives and strategies for ESA-listed anadromous fish populations and their habitat that form the basis for actions identified in a 3-year implementation work plan. The 3-year implementation work plan is updated annually based on information generated from our adaptive management framework. The work plan identifies what needs to occur in the next three years including the highest priority projects, assessments, research, monitoring, and evaluation needs, and identifies local and state policies as well as outreach needed to successfully implement the recovery plan. We request that the Program recognize the work plan and utilize it for guiding future investments as the actions and measures-of-results included in the work plan are fully expected to be implemented, a goal that is consistent with objectives that the Program seeks to achieve. Program implementation consistent with the 3-year work plans must continue for five to ten years for the effects of the actions and programs to be confirmed. Aside from adaptive management, we request that a call for subbasin plan revisions be delayed five years at least where recovery plans have been developed. We request that the Council embrace the completed subbasin and recovery plans and the processes developed to adaptively manage and implement the plans.

Therefore, the SRSRB offers the following recommendations:

- Integrate the implementation portion of our recovery plan and its implementation work plan with existing and any future revisions of the subbasin plans within the Snake River Region and incorporate this approach into the Program amendments;
- Accommodate changes to our work plan that are based on our adaptive management process into any future subbasin plan updates within the Snake River Region; and
- Refrain from calling for revisions to subbasin plans for at least five years.

Research, Monitoring and Evaluation

The Snake River Salmon Recovery Plan includes a description of the critical research uncertainties in the region. The Snake River Regional Technical Team has been working with NOAA to further articulate these uncertainties, and to finalize the Snake River Region Monitoring Plan. These elements are part of the larger adaptive management framework in place to manage the Snake River Salmon Recovery Plan over time. These elements will help us identify what we need to know, how to use that information to guide on-going recovery activities, and to track the changes as a result of those actions.

Coordination between the Council and the region with respect to research, monitoring, and evaluation is critical. Monitoring is a critical step in the overall process. Because monitoring is expensive the SRSRB has identified priority monitoring programs that are essential to answer the question – are our actions affecting the change intended? Furthermore, the Snake River Region Monitoring framework is based on monitoring activities that help us answer the priority questions related to delisting criteria.

Monitoring requires long term commitment and the Council's program needs to identify responsibilities of the Bonneville Power Administration (BPA) to implement programs and projects to achieve its mitigation and ESA obligations. In the absence of commitments to long term monitoring the benefits of such programs and projects cannot be verified and serious questions about the estimated benefits are raised.

Key monitoring questions must be identified to provide guidance and specificity to monitoring programs funded through the Program. Monitoring of the Viable Salmonid Population (VSP) parameters and listing factors should be a high priority for monitoring activities funded under the Council's Program. VSP parameters are based on biological criteria (i.e. abundance, productivity, diversity and structure) while the listing factors are largely habitat based (e.g. sediment, temperature, flow, habitat complexity, etc). The Recovery Plan specifies the VSP targets as well as objectives for each of the primary limiting factors. It is critical that monitoring programs be focused on these key indicators in a coordinated approach that provided information focused on these recovery criteria. The Council requests that parties focus their monitoring recommendations on a suite of key questions: (1) should the Program goals only focus on performance metrics within the responsibility of the power system; (2) what form would these goals and biological performance measures take for anadromous fish; and (3) should the program focus more on improving quantitative measures of anadromous fish survival at and through the mainstem hydropower projects or improving measures of productivity in upstream habitat?

Our recommendation is that the Program goals focus on monitoring measures of improved productivity in upstream habitat and retain existing programs to evaluate biological performance (i.e. survival) within the responsibility of the power system. The BPA has invested and continues to invest in watershed improvements to mitigate the loss associated with the mainstem projects. Monitoring the effectiveness and verifying the results of these investments is critical to provide for adaptive management and to demonstrate accountability to rate payers that the investments are paying off.

Therefore, the SRSRB offers the following recommendations as they pertain to Research, Monitoring and Evaluation

- Incorporate the research uncertainties described in the Snake River Salmon Recovery Plan and the SRSRB priorities for research funding into the Program;

- Ensure that new funds are made available for long-term monitoring of responses to specific actions across the region focusing on the biological criteria (VSP) and listing factors, primarily habitat; and
- Include the Status, Trend and Effectiveness Monitoring (STEM) databank at NOAA as one of the systems to which information from the Council and information funded through BPA will be disseminated.

Coordination and Project Review

We encourage the Program to look to the SRSRB to provide a regional review process for the purpose of ensuring project consistencies with the recovery plan for listed anadromous fish species. The SRSRB includes representation and support from the state and federal agencies, Confederated Tribes of the Umatilla Indian Reservation, county governments and landowners. The SRSRB can help the Council ensure that the proposed actions are consistent with the recovery plan and are supported by the stakeholders at the regional scale to the extent practicable. This is a real benefit to the NPCC and BPA as it ensures efficient and effective use of their dollars in a transparent and understood approach. To the extent we can achieve a relative prioritized list of projects across the Snake River region we will strive to achieve.

The SRSRB is positioned to be integral to coordinating and reporting specific program elements at the regional scale, i.e., across multiple subbasins and entities. Reporting implementation accomplishments and information to regional stakeholders; coordinating research, monitoring and evaluation programs; providing project review and partner coordination; and, adaptive management of the goals, objectives and strategies are all regional coordination functions that the SRSRB is positioned to provide to the Council.

Therefore, the SRSRB offers the following recommendations as they pertain to Coordination and Project Review:

- Partner with the SRSRB for coordinating implementation of basinwide strategies including monitoring and evaluation, research, program implementation, project review; and, reporting implementation accomplishments and information to regional stakeholders
- Commit to a formal relationship with the SRSRB for upcoming project solicitation round(s)

Mainstem Objectives and Measures

A critical limiting factor for Snake River Fall Chinook Salmon is shoreline habitat and related characteristics of a functional shoreline. The 2003 Main stem Amendment contains an objective of restoring shorelines in the Snake River. The SRSRB strongly encourages the Council to reinforce this strategy as it will improve the survival of Snake River Fall Chinook and reduce the habitat quantity and quality for predator species as well as those strategies to reduce non-native species predation on ESA-listed fish. Further, the SRSRB strongly encourages the Council to reinforce and support other strategies and programs to improve survival in the main stem Snake and Columbia rivers to compliment improvements in tributary productivity. Improvements in the main stem river and tributaries must occur in order to successfully implement the Program.

Columbia Basin Hatchery Review (HSRG):

Columbia Basin hatchery review processes (e.g. Hatchery Scientific Review Group (HSRG), USFWS review, others) are developing recommendations for hatchery practices and related harvest management decisions to assist in achieving recovery goals and implementing recovery plans for ESA-listed and non-listed salmon and steelhead populations in the Columbia Basin. These recommendations will be completed by the end of 2008 and will be considered by the fishery co-managers to develop recommended action plans for improving current hatchery facilities and practices. These action plans may not be completed in time to be incorporated into the Program amendments. The SRSRB recommends that a commitment be included in the Program amendments to incorporate appropriate hatchery reform actions to the extent those results are consistent with recovery goals and the Snake River Salmon Recovery Plan and are agreed upon by fishery co-managers.

We appreciate the opportunity to submit these recommendations and look forward to hearing how they will be addressed. Please do not hesitate to contact our Executive Director, Steve Martin at (509) 382-4115 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Del Groat".

Del Groat

SRSRB Chair