

## HEP Proposal Response to ISRP

DRAFT

7/6/06

### *Recommendation: Fundable in part*

#### *Comment:*

Overall the ISRP viewed the use of HEP as a policy decision. HEP has played and can continue to play a role in the Council's program by establishing mitigation credits against the initial baseline losses that were agreed to be reasonably indexed by habitat units (HUs) derived from HEP. However, HEP is no longer considered to be a good method for evaluation of value of land to wildlife, as there have been significant improvements in both analytical methods and available data that underlie estimation of the relationships of wildlife species and assemblages to habitat. Further, HEP is not a sufficiently direct measure to support the purposes of monitoring and evaluation. Far better monitoring approaches and metrics are now available, and use of more direct approaches is required for effective evaluation of benefits to wildlife. In sum, HEP alone does not provide adequate biological M&E, and direct biological M&E is not improved by continuing HEP.

If the Council continues to use HEP as the basis for initial determination of mitigation value, then a consistent approach to evaluation is desirable and a standardized HEP approach could help to achieve such consistency. In this case, the proposed project should present more clear explanation of methods to be used, including the timing of sampling and what specific HEP models would be used to evaluate the structural characteristics of habitat, and any additional needed details to allow evaluation of sampling methods.

The reviewers found the CHAP portion of the proposal Not Fundable. The proposal did not provide convincing evidence that the approach of NWI would be a significant improvement over the HEP-derived habitat unit metric now in place. In particular, the methods used to determine habitat value (HV) were not clearly presented. It would have been useful for the proposal to include a more clear explanation of the calculation and use of habitat value, with an example from a subbasin of how to use the metric, habitat value, as a measure of progress towards mitigation. It seems likely that direct biological M&E will almost always be more convincing, more interpretable, and thus more useful for evaluation and application to management decision making than would be a less direct, HEP-type measure. The proposal did not convince the ISRP that the NWI efforts to improve HEP would be as good as direct biological M&E.

The ISRP also noted that actual evaluation of wildlife projects was rarely provided in proposals. The use of HEP or CHAP would imply that habitat was an adequate proxy for value to wildlife, but this proposal does not articulate habitat goals or how and when progress towards goals would be measured. The use of HEP to provide monitoring and evaluation is not considered scientifically well advised. The relationships of HEP- or CHAP-derived metrics to focal species identified in subbasin plans or to non-focal species were not defined.

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CBFWA Response:

In the recent FY 2007 – FY 2009 project proposal review, the ISRP stated that HEP is not an effective monitoring and evaluation tool and that other, more robust techniques are available for monitoring change in wildlife habitats. The ISRP further asserted that the Combined Habitat Evaluation Procedures (CHAP) approach, which combines aspects of HEP with the Northwest Habitat Institute’s Habitat Value (HV) rating system, is not a significant improvement over HEP derived metrics for monitoring habitat. The ISRP recognized that HEP served a purpose for the Program, but also recommended that the CHAP portion of the proposal not be funded.

CBFWA agrees that HEP and CHAP are not the best M&E tools and that more robust habitat monitoring and evaluation protocols are available to managers at the project level; however, the ISRP is somewhat misguided in suggesting that HEP or CHAP were developed as monitoring and evaluation tools and/or are being used as M&E tools.

HEP was developed to answer the question of how much will it cost (in habitat units or HUs) to mitigate for a development action (in this case the construction and operation of the FCRPS). HEP was not designed as a robust monitoring and evaluation tool although some managers have used it as such lacking any other project M&E protocols. Simply stated, HEP is a crediting instrument not a robust M&E tool. The HEP models variable outputs, however, can be used as a “course filter” to identify habitat deficiencies that may limit target species populations and/or to trigger habitat management actions or further investigations.

As the Region moves closer to fulfilling BPA’s terrestrial habitat obligation (“HU ledger”), it is increasingly important to ensure that HEP evaluations (again for crediting purposes) are conducted in a timely, consistent manner across the entire Columbia Basin Region. The Regional HEP Team (RHT), with assistance from project managers, is the least biased most effective approach to accomplishing this task.

The FY 2007 – FY 2009 RHT project proposal budget was developed based on the following precepts:

1. That the need for HEP evaluations will increase as BPA moves closer to meeting its terrestrial mitigation obligation (managers need to know how many and what type of unmitigated habitat units remain and where they occur).
2. That BPA will request pre-acquisition HEP surveys which will likely require the RHT to “split” into two teams in order to ensure that HEP evaluations on new acquisitions are conducted in a timely manner (acquisitions are generally “opportunity driven” and therefore are temporally unpredictable requiring the RHT to be flexible and responsive to the needs of wildlife area managers).
3. That HEP evaluations are needed on both recent acquisitions and established projects (a number of projects have not been re-evaluated for 10 years or more).

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4. That HEP is not the best “tool” to determine habitat unit credit for Willamette Valley mitigation projects and that another methodology (CHAP) needs to be developed to accomplish this crediting task. CHAP is preferable to HEP as a tool to determine HU crediting in the Willamette Valley for the following reasons:
  - a. Standardized HEP models were not used to determine habitat losses for Willamette hydro-projects and are, therefore, not available for use in the Willamette Valley.
  - b. Appropriate crediting rates (HU stacking) cannot be applied to Willamette Valley mitigation projects due to the lack of applicable models.
  - c. Most if not all habitat types described in Willamette loss assessments do not occur in the Willamette Valley resulting in off site/out of kind mitigation/compensation.
  - d. Subbasin plans for the Willamette Valley list different priority habitats and wildlife species than those described in loss assessments.
  - e. HEP is not readily accepted by the public, NGOs, and state/federal entities concerned about mitigation in the Willamette Valley.
  - f. CHAP is an ecologically based habitat assessment tool that is much broader in scope than HEP habitat suitability models.
  - g. CHAP eliminates the need for and/or subsequent discussions/arguments over species models and HU stacking (CHAP evaluation parameters include key ecological correlates (KECs), key ecological functions (KEFs), functional redundancy, etc.).
5. That development and application of CHAP requires assistance from the Northwest Habitat Institute (NHI) including habitat evaluation support, map products, and data analysis (funding is needed by both the RHT and NHI to accomplish this task).
6. That the RHT will spend significant time evaluating Willamette Valley mitigation projects during the next funding cycle (this will result in additional travel costs etc.).

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