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Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

July 10, 2002

In reply refer to: KEW-4

Mr. Frank L. Cassidy, Chair
Northwest Power Planning Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204-1348

Dear Mr. Cassidy,

The Bonneville Power Administration (Bonneville) requests the Northwest Power Planning Council recommend implementation of the "Safety-Net Artificial Propagation Program (SNAPP)", as described in Mountain Snake Provincial Review Proposal No. 28061.

At its June 11, 2002 meeting in Bend, the Council's Fish and Wildlife Committee referred the SNAPP proposal back to Bonneville for resolving ongoing concerns expressed by the Independent Scientific Review Panel (ISRP). Since project sponsors met with the ISRP in May, the SNAPP proposal and budget have been twice modified to address many of the issues raised by the independent scientists. Bonneville and the National Marine Fisheries Service (NMFS) believe the proposal and budget have been significantly and sufficiently improved as a result of the ISRP's comments and needs to proceed at this time.

The safety net or contingency planning outlined in the proposal is a critical Reasonable and Prudent Alternative of the NMFS 2000 Federal Columbia River Power System (FCRPS) Biological Opinion. The proposal enables the development of contingency artificial propagation intervention plans that would be triggered in emergency situations to preserve important, at-risk populations of Endangered Species Act-listed Chinook salmon and steelhead in the Snake Basin until the measures in the Fish and Wildlife Program and the FCRPS Biological Opinion take effect. These contingency plans are a critical performance element of the three, five and eight year check in's required by NMFS of the federal action agencies for implementation of the FCRPS Biological Opinion.

Bonneville and NMFS view the safety net plans as complimentary to, and not duplicative of, the forward-looking, subbasin/recovery plans under development by the Watershed Councils and the work of the Technical Recovery Teams. The SNAPP work plan now reflects the needed integration with these other planning efforts.

The safety-net plans, to be implemented only when absolutely necessary, would initiate short-term conservation measures prior to excessive population decline, and before flexible and cost-effective options are lost. Through SNAPP, the region should avoid further last-minute crisis interventions that come at greater biological risk and economic cost. While the improved salmon and steelhead runs of the past few years are encouraging, we know that this abundance has not been uniform across many natural-origin fish populations and may not continue. We can still anticipate leaner years ahead. We must be prepared to protect against further population extinctions that can only serve to make species recovery and Fish and Wildlife Program success more difficult and costly to achieve.

The attached document provides additional information, responding to concerns expressed by the Independent Scientific Review Panel and Council staff. Your attention to this issue would be appreciated.

Sincerely,

Robert J. Austin
Deputy Director for Fish and Wildlife

Enclosure:
SNAPP – Issues and Responses

cc:
Mr. Larry Rutter – National Marine Fisheries Service
Mr. Brian Brown - National Marine Fisheries Service
Mr. Rod Sando - Columbia Basin Fish and Wildlife Authority

July 10, 2002

SAFETY NET ARTIFICIAL PROPAGATION PROGRAM

ISSUES AND RESPONSES

Issue 1. The approval process for SNAPP interventions needs to be clearly stated in the SNAPP proposal.

Implementation of the SNAPP proposal and subsequent development of SNAPP contingency plans do not equate directly to implementation of new artificial propagation projects. The SNAPP proposal and associated funding ends at the development of contingency, intervention plans. SNAPP plans will include biological triggers that will alert the region to engage existing review and decision processes to consider implementation of a contingency plan. These processes include the Council's 3-Step Process, NMFS' section 10 permit or other applicable processes, application of policies from the Artificial Production Review, scientific review, NEPA, and Council action. Given the emergency nature of a SNAPP project, however, these processes may need to be expedited. The SNAPP proposal has been amended to clarify this decision review process.

Issue 2. Bonneville could fulfill the biological opinion's requirement for SNAPP through the subbasin planning effort or Technical Recovery Teams

The original consolidated SNAPP proposal was developed and submitted to the provincial funding process prior to the formation of the TRT and development of its work plan. The initial SNAPP proposal anticipated coordination with the TRT, yet integration of the two planning efforts was not possible at that time. The SNAPP work plan has now been coordinated with the co-chairs of the TRT. Consequently, in two key areas, population delineations and extinction risk analyses, these planning efforts have been fully integrated resulting in substantial savings in the SNAPP budget. To ensure consistency in planning efforts, SNAPP will now replace its original list of Snake Basin spring/summer Chinook and steelhead populations to be evaluated for extinction risk with the population structure that will arise from TRT deliberations. SNAPP-funded scientists will work through and assist the TRT, via its Viability Subgroup, in conducting the extinction risk analyses necessary for both efforts. This too has resulted in cost savings in the SNAPP budget and is reflected in the revised SNAPP proposal. Following the completion of extinction risk analyses, SNAPP participants will develop and analyze intervention options and develop contingency plans, with product reviews by the TRT.

The SNAPP proposal also now reflects key, coordination milestones with subbasin planning. SNAPP will inform appropriate planners of the results of the extinction risk analyses, particularly findings of excessive extinction risk, for populations in their subbasins. SNAPP

participants will seek from the subbasin planners their recommendations on intervention options for benefit-risk analysis and contingency planning. Should the most biologically beneficial and cost-effective option be habitat or passage (non-propagation) activities, this information would be immediately provided to the planners for consideration as priority action in their plans. If the artificial propagation option must be chosen, its development would be coordinated with planners and ultimately incorporated into appropriate subbasin plans.

The development, analysis, and planning for artificial propagation are very technical and specialized. These efforts should be coordinated and integrated with TRT and subbasin planning efforts, but are best conducted by those with scientific and management knowledge and experience.

Issue 3. SNAPP is biased towards, and presumes the use of, artificial propagation as the conservation measure to use in the safety net.

The proposal has been modified to clarify that artificial propagation intervention is an option of last resort. The goal of SNAPP is a prompt increase in population abundance to avoid extinction or serious genetic risks. But, if that goal can and will be met without artificial propagation, then a habitat-based alternative will be preferred. It must be realized though that most habitat enhancement actions take years, if not decades, to become effective and therefore may not achieve the objective of immediate increases in fish abundance should the need arise. A final assessment of pending habitat measures will also be an integral part of the "triggering" decision process.

Additionally, to avoid any bias toward artificial propagation resulting from incomplete information and to minimize the diversion of funds from long term, habitat-based solutions to declines in population viability, the SNAPP proposal presumes that the default action in the face of uncertainty about the need for the action is non-intervention. Therefore, use of artificial propagation will only occur if the conclusion of net biological benefits is compelling relative to alternative actions or no action.

The decision process for implementing a SNAPP project also contains significant checks and balances to ensure new artificial production actions are beneficial and necessary. Implementation decisions that come before the Council will be fully informed and public. Any SNAPP project will also need to receive the scrutiny of the applicable ESA processes administered by NMFS.

There is considerable disagreement, if not discord, in the region about the use of artificial production. Some maintain that it has been inappropriately relied upon historically as a mitigation panacea for the adverse impacts of hydrosystem and other economic development, yet is viewed by many as the most feasible and successful option for meeting societal and tribal treaty demands for fish. These differences in perspectives are fueled by the uncertainty surrounding the positive and negative effects of artificially produced fish. SNAPP sponsors

anticipate applying the full and most current scientific information and methods in consideration and development of contingency plans in an effort to minimize the "philosophical" debate about artificial production.

Issue 4. The methods proposed for extinction risk analysis and benefit-risk analysis are too qualitative and insufficiently quantitative, are largely subjective, and therefore too vague to guide decision-makers.

The SNAPP proposal has been amended to clarify its analytical methods. SNAPP intends to use the best available information and methods to evaluate extinction risk of populations and to evaluate the benefits and risks of various options to minimize extinction risk. As the ISRP has commented, these methods are in many cases new or under development and often not as quantifiable as preferred. Given their shortcomings, the methods are still the best available to organize and evaluate the data at hand, and inform decisions on whether or not, and how, to intervene. The need for contingency planning to guide better, more timely decisions on intervention is paramount irrespective of the shortcomings of available methods to aid decision-making.

Analytical methods are often not deterministic, yet must be used to inform necessary decisions. Such methods are also improved by their use and application. The alternative to not applying best available information and methods to real-time problems is that needed action is not taken or taken too late, when they are more costly and less effective. The region has demonstrated that behavior by waiting too long and then needing to implement drastic, costly, and yet necessary measures such as captive broodstock programs.

Issue 5. Benefit-risk analysis should be performed on all options considered, not just the recommended alternative.

The SNAPP proposal has been altered to reflect that benefit-risk analysis will be performed on all options and used as the primary means (along with cost and feasibility analyses) to select and then evaluate the preferred conservation option upon which a contingency plan will be developed.

Issue 6. Implementation of a SNAPP project should be consistent with the policies and implementation of the Council's Artificial Production Review.

Coordination of SNAPP activities and products will be undertaken through the Council's Artificial Production Advisory Committee. The progress and direction of the Artificial Production Review and Evaluation will also be integrated into SNAPP. Any contingency plans developed in SNAPP will specifically address the principles and policies adopted in the region's Artificial Production Review.