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The concentric circle was a design frequently used in Native American Columbia River pictographs. It may signify the sun, or a pool of water; or may simply be decorative. This example, from the Big Eddy reach, was submerged in 1957.

June 15, 2006

Patty O'Toole
Program Implementation Manager
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204

Dear Ms. O'Toole,

The Bonneville Environmental Foundation (BEF) wishes to take this opportunity to formally comment on the ISRP's Preliminary Review (2006-4) of the Coeur d'Alene Reservation Habitat Enhancement Proposal (Project 199004400).

Our desire to provide comment to the Council with regard to the proposed Coeur d'Alene project is prompted by the contrast between BEF's ongoing internal evaluations of this project and the comments provided by the ISRP in its Preliminary Review of Fiscal Year 2007-2009 Proposals for the Columbia River Basin Fish and Wildlife Program. The published ISRP comments suggest that the Coeur d'Alene Tribe has not developed the means to evaluate restoration effectiveness or assess cutthroat trout recovery. BEF's ongoing reviews of the Coeur d'Alene watershed restoration and monitoring programs, in contrast, have persuaded us that the Tribe has developed (and is now implementing) a comprehensive monitoring and evaluation program that directly tracks the effects of restoration actions on habitat, water quality, and cutthroat trout populations.

BEF Background

BEF implements a Model Watershed Funding Program that makes 10-year commitments of support to watershed restoration and monitoring programs in the Pacific Northwest states of Oregon, Washington, Idaho, and Montana. BEF's Model Watershed Program reviews projects and proposals from across the Pacific Northwest in an effort to identify, select, and support watershed and fisheries restoration programs that demonstrate the following:

1. A strong scientific basis to guide and prioritize restoration and monitoring actions and investments;
2. Statistically valid, long-term monitoring and evaluation programs that evaluate restoration effectiveness and facilitate an adaptive approach to restoration;

3. A high likelihood of addressing fundamental watershed processes responsible for limiting production of native species in target watersheds, and
4. The potential to serve as a model for accountable, long-term watershed-scale restoration.

The Coeur d'Alene Tribe's Restoration and Monitoring Program

BEF has reviewed hundreds of proposed watershed projects, and the Coeur d'Alene Tribe's Benewah Creek restoration program is one of only 3 projects that BEF has found to meet our criteria for 10-year Model Watershed support. The Coeur d'Alene project demonstrates consistency with the four program prerequisites listed above, and it ranks at the highest levels of any program that the Foundation has reviewed. The Coeur d'Alene Tribe's high ranking by BEF is in large part due to the Tribe's employment of a comprehensive effectiveness monitoring program. This program is designed to track and evaluate both habitat improvements and the recovery of native cutthroat trout at both the reach and watershed scale.

BEF Program Reviewers

Several members of BEF's Watershed Project Committee and Independent Science Team are former and current members of the ISAB and ISRP, and other BEF reviewers are well-known Columbia Basin fisheries scientists and watershed policy analysts. As a result, our reviews of Coeur d'Alene watershed and fisheries restoration programs have been conducted by high level, professional and academic scientists with demonstrated achievement and high standing in the fields of watershed and fisheries science.

The due diligence reviews conducted to date by the BEF Watershed Project Committee and Independent Science Team members stand in contrast to the comments listed in the ISRP's Preliminary Review of the Coeur d'Alene Reservation Habitat Enhancement Proposal (199004400). BEF's evaluations of proposed restoration and monitoring work in the Coeur d'Alene basin highlight a comprehensive effectiveness monitoring program. During BEF's past evaluations of Coeur d'Alene restoration and monitoring work, BEF's reviewers have noted the following:

- Careful and thorough monitoring is proposed and underway for the project.
- The presence of treatment and control reaches allows greater statistical power in determining the effectiveness of ongoing fisheries and habitat restoration actions.
- The Tribe is employing a watershed-scale approach to both restoring and evaluating the success of fisheries recovery in target tributary streams.
- Long-term monitoring of population status and trends will enable the Tribe to evaluate restoration effectiveness and adjust future restoration actions according to measured results.

Contrast with ISRP Review

Based on the reviews performed by BEF's Independent Science Team and Watershed Project Committee, we are forced to respectfully disagree with the ISRP reviewers' conclusion that the proposed Coeur d'Alene project "has not adopted appropriate methods to enable the assessment of success." BEF's review of the Tribe's watershed and fisheries work in the Coeur d'Alene basin came to precisely the opposite conclusion. Equally we are unable to find, in our own review, evidence supporting the ISRP's conclusion that the Tribe's proposed monitoring activities will "do nothing to show any benefit to cutthroat trout from this project."

Our review, in fact, suggests that fisheries monitoring and restoration work conducted by the Tribe in several key Coeur d'Alene tributaries may serve as a model to guide the development of effectiveness monitoring strategies in other programs located across the Upper Columbia Basin.

Previous ISRP reviews indicated that the Coeur d'Alene Tribe needed to collect fish abundance data in order to show positive or decreasing trends as a result of habitat restoration activities. Based on the information available to BEF, it appears that the Tribe has both eagerly responded to previous ISRP recommendations and has developed a systematic program to collect fish abundance information and evaluate habitat restoration success.

Based on BEF's assessment, the Tribe now implements one of the more advanced and scientific monitoring and evaluation programs in the upper Columbia basin, and for this reason BEF has supported the Tribe's Benewah Creek Restoration Program as a model for watershed scale recovery and monitoring. During BEF's previous reviews of the Coeur d'Alene program, we noted that the Tribe's approach has been validated and supported by independent scientific review and funding through the National Fish and Wildlife Foundation, BPA, and the Northwest Power and Conservation Council's own Subbasin Planning Process.


The Coeur d'Alene Tribe's ongoing work to restore native resident salmonid populations as mitigation for lost anadromous fisheries is of great cultural significance to tribal members. In our experience the Tribe has eagerly adjusted and improved its watershed programs in response to past independent scientific review in order to strengthen its efforts to restore populations of cutthroat trout.

We are not in a position to suggest which programs should receive funding through the Council and BPA Fish and Wildlife Mitigation Programs. Furthermore, we do not seek to advocate that one project is more or less deserving of funding than another. Our objective in filing these comments is to identify a significant discrepancy between the findings of BEF's due

diligence review of the Coeur d'Alene program and this recent ISRP review. We believe this discrepancy should prompt the ISRP and Council staff to at least revisit and reconsider its posted conclusions and its rejection of the Tribe's program proposal.

We thank you for the opportunity to provide comment on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Angus Duncan', with a long horizontal flourish extending to the right.

Angus Duncan
President, Bonneville Environmental Foundation