



Department of Energy

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Bonneville Power Administration
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ENVIRONMENT, FISH AND WILDLIFE

August 2, 2002

In reply refer to: KEW-4

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

Dear Chairman Cassidy:

Enclosed please find Bonneville Power Administration's (Bonneville) comments on the FY 2002 Innovative Project Proposals submitted in response to the Bonneville/Northwest Power Planning Council (Council) solicitation of February 20, 2002. We appreciate the Council's review of the Independent Scientific Review Panel (ISRP) science evaluation of these projects, the Columbia River Basin Fish and Wildlife Authority (CBFWA) management recommendations, and the comments received from the public during the review process. We also recognize that the Council's Fish and Wildlife Committee agreed with the staff recommendation at the July 16, 2002 meeting in Yakima, to go forward with proposals ranked 1 through 8 by the ISRP for approval by the full Council at its August meeting. These 8 proposals include, in rank order, 34008, 34019, 34022, 34021, 34036, 34002, 34001, and 34030.

Bonneville's review of the proposals took into account both the needs of the Council's Fish and Wildlife Program and our responsibility under the National Marine Fisheries Service's (NMFS) and U.S. Fish and Wildlife Service's (USFWS) Biological Opinions to avoid jeopardy to listed species from operation of the Federal Columbia River Power System. From that perspective, BPA concurs with the Council's staff recommendation on three of the eight proposals: 34019, 34022, and 34021. We have a difference of opinion, however, with the recommendation on the other five proposals: 34008, 34036, 34002, 34001, and 34030, and would like to suggest consideration of two proposals that were not among the eight recommended by Council staff. Our rationale is set out below.

Proposals 34019 and 34022 directly address Reasonable and Prudent Alternative actions 155 and 180, respectively, in the NMFS Biological Opinion. The first addresses potential adverse impacts on endangered Snake River fall chinook from a life history perspective, rather than treating symptoms of those impacts, as does the current practice of simply augmenting flows when these fish seem to be ready to migrate. The second proposes an innovative technique to address anadromous fish population status monitoring necessary to determine whether ESA

listed stocks are showing improvement from recovery actions. This is vital information for NMFS in determining whether an ESU remains in jeopardy or is in the process of recovering. We are currently in discussions with NMFS and the USFWS concerning which of our agencies are ultimately responsible for funding such monitoring projects. We feel the development of the monitoring technique, as proposed in 34022, is appropriate for Bonneville funding under the innovative proposal process. However, any subsequent funding of this kind of monitoring should await the development and implementation of a comprehensive and integrated regional research, monitoring, and evaluation program.

While proposal 34021 does not address an RPA measure, it is a Conservation Recommendation in the NMFS Biological Opinion. We agree with the ISRP that this proposal addresses a question that has not attracted the attention it likely deserves. The proposal appears to do an excellent job of addressing the potential affect of the abundant non-native American shad within the FCRPS on salmonids. We believe this project addresses a high priority issue identified in the Council Program and the NMFS Biological Opinion and will facilitate decisions on actions that contribute to progress on hydrosystem performance standards.

In addition to the three projects, above, where Bonneville and the Council staff are in agreement, we recommend the Council consider two proposals that were not included in the preliminary considerations during the Yakima meeting. These are proposals 34005 and 34023. Both of these projects address measures in the NMFS Biological Opinion (RPA's 180 and 149, respectively). Again, we believe these proposals demonstrate contribution toward objectives of both the NMFS Biological Opinion and of the Council's Fish and Wildlife Program. Our rationale, and our caution with regard to future funding, in recommending further action on proposal 34005 are similar to those for 34022. The technique discussed in this proposal could be instrumental in developing population status information vital to ESA decision-making. The ISRP also recognized the value of this proposal in giving it a rank of 16, though we place an even higher priority, and promise, on the proposed DNA micro-array technology for addressing the critical uncertainty regarding the effects of hatchery origin fish on ESA listed stocks without the use of tags or marks. We also support proposal 34023 because of its promise in developing a more effective fish screen for use in high sediment streams and canals. Developing efficient screens for this type of environment have become a costly undertaking and success has been elusive. The extensive list of cost sharing partners from a variety of shareholders was also a consideration in our recommendation, and one that deserves encouragement. The ISRP ranked this proposal 13.

We are not recommending other proposals included in the Council's staff recommendation for the following reasons. We are not recommending proposals 34001 and 34002 because they lack a common priority within the Biological Opinion and the Council Program. Likewise, we are not recommending proposal 34008 because of the lack of association with either planned or ongoing research, monitoring, and evaluation activities under the Biological Opinion, and does not include provisions for future integration into the developing RM&E framework. We believe that action on these proposals at this time would be premature until pending decisions are made on research, monitoring, and evaluation proposals currently being reviewed and, potentially, modified within the Mainstem/Systemwide Provincial Review process. We suggest that these

proposal sponsors be encouraged to work within the developing Mainstem/Systemwide Review process to further develop their proposals to meet shared objectives for RM&E within the Biological Opinion Framework and the Council Program, and to ensure that any redundancies and/or unnecessary tasks are avoided.

We do not support proposal 34030; while it suggests an innovative means to conserve water, it does not address the process by which that water would be protected; resulting in the risk that any conserved water could be subject to take by other water users in the same watershed. We feel water conservation measures are appropriately funded through the Fish and Wildlife Program only if they can demonstrate an ability to enhance fish and wildlife populations. Finally, while we agree with the ISRP that proposal 34036 appears to provide an innovative approach to developing data sets and calibrating models such as EDT, the proposal lacks sufficient rationale underlying their assumption that conditions in the Salmon River Basin have applicability throughout other (and dissimilar) subbasin within the region. We also suggest this proposal, if considered viable, may be appropriate for further action under the Council's Subbasin Planning contract.

In addition, we generally agree with ISRP comments on unranked proposals and do not recommend any further consideration of them.

We offer these recommendations in the spirit of achieving shared objectives within the Council's Fish and Wildlife Program and through implementation of the NMFS' and USFWS' Biological Opinion. We look forward to working with the Council to finalize the selection of projects to be implemented in the innovative projects category.

Sincerely,

Sarah R. McNary
Director for Fish and Wildlife

Enclosures:

Criteria and Ranking System used for Bonneville Review of Innovative Project Proposals
FY002 Funding Recommendation for Innovative Projects

cc:

Mr. Rod Sando - Columbia Basin Fish and Wildlife Authority
Mr. John Palensky – National Marine Fisheries Service
Mr. Doug Marker – Northwest Power Planning Council
Mr. Brian Brown – National Marine Fisheries Service
Mr. William Shake - U.S. Fish and Wildlife Service

bcc:

S. Wright – A-7

A. Smith – KE-4

A. Redenbo – KEWB-4

M. Shaw – KEWN-4

D. Daley - KEWR

K. Hunt – KR-7

S. McNary – KEW-4

J. Rowan – KEWI-4

R. Sivyer – KEWB-4

Official File – KEW (FW-24)

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Criteria and Ranking System used for Bonneville Review of Innovative Project Proposals

CRITERIA:

In order for a proposal to be considered for funding in the innovative review, it must:

- Be consistent with the Council's Fish & Wildlife Program;
- Not be in conflict with NMFS' or FWS' 2000 Biological Opinions or the Action Agencies' Implementation Plan;
- Be consistent with Federal trust and treaty responsibilities;
- Have scientific merit (rely largely on ISRP);
- Be implementable (technical feasibility);
- Include the appropriate level of effort and costs (including constraints specific to the innovative process); and
- Be innovative.

RANKING SYSTEM:

Our recommendations were reserved for proposals in which the objectives are clear and where not funding the project would significantly reduce the opportunity to achieve benefits from other projects funded by BPA. Also, we recommended Innovative Proposals that are technically sound and meet the need to implement a particular RPA action under NMFS' 2000 Biological Opinion or measure under the FWS' 2000 Biological Opinion, as described in the Action Agencies' Implementation Plan, show promise to be integrated into or compliment the developing Regional Framework for R,M&E, or provide clear benefit relative to subbasin/recovery planning.

Proposals submitted to the innovative review process were assigned to one of four categories based on the following:

Category A List

An innovative proposal that either addresses a specific RPA in NMFS' 2000 Biological Opinion or measures in the FWS' 2000 Biological Opinion, provides a clear benefit to subbasin or recovery planning, or the objectives of the project are clear and where not funding the project would significantly diminish opportunities to make advancements that contribute to either Biological Opinion or Program objectives.

Category A List - Conditional

Additional detail is required prior to final decision to fund, or some limitations in scope and funding level of projects are recommended.

Category B List

An innovative proposal that should await development of a regional research, monitoring and evaluation plan (RM&E).

Category C List -

An innovative proposal that should await completion of a Sub-Basin Plan as it involves: a) significant and unresolved policy issues, and/or b) complexities that should not be addressed until a Sub-basin Plan is completed.

Criteria and Ranking System used for Bonneville Review of Innovative Project Proposals

Category D List - Proposals that are not innovative or that exceed duration or cost limitations established for innovative projects.

In reviewing proposals' potential relationship to the Annual Implementation Plan (IP), projects were reviewed by strategy and the high-priority considerations outlined in the IP.