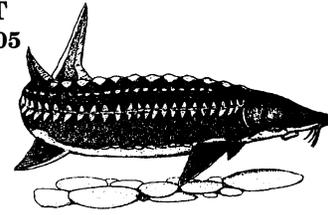




KOOTENAI TRIBE OF IDAHO

FISH AND WILDLIFE DEPARTMENT
P.O. Box 1269 Bonners Ferry, Idaho 83805
(208) 267-3620 Fax No. (208) 267-1131



April 5, 2010

Dear Mr. Iverson,

CBFWA has been invested in resolving issues related to regional fish and wildlife monitoring and evaluation in the NPCC Fish and Wildlife Program for years. Fish and wildlife managers continue this approach in the organization and collection of meaningful data at the project level, work towards data sets that are comparable and compatible, share information between subbasins/basins/provinces, and this collaboration assists the Program and the Basin's managers with current and future management decisions.

For these reasons, there are three potential options for MERR comments: 1) combine and prepare a list of comments from fish and wildlife managers to submit to NPCC by April 26th within the MERR comment deadline, 2) submit a letter as stated in #1, whereby it outlines that additional editorial changes to the MERR will be recommended by the corresponding "strategy" proponents, 3) submit a letter from CBFWA to NPCC/staff that requests that the MERR be formally reviewed by all the CBFWA Fish and Wildlife Committees, and have adequate time to submit a professional, peer-reviewed document that is separate from the "strategies" outlined in Appendix 6-8.

The MERR is a great beginning in the development of a monitoring, evaluation, research and reporting plan, but for numerous reason and not limited to the below mentioned, there is a need for additional time, effort and professional over-sight:

- MERR lacks how data will be reported (i.e., beyond Pisces/Taurus), misses potential resources available (SOTR, etc.) and is inadequate how it will compare data at different scales (and without being prescriptive in how data should be collected and/or analyzed).
- Priority/Focal species list and habitat characteristics (Appendix 4) are inadequate, incomplete, not based on fish and wildlife managers input, and are not consistent with data collected at the project/basin level.
- MERR lacks adequate descriptions for known Program deficiencies (i.e., HEP monitors for compliance only and does not provide biological monitoring necessary for status and trends and action effectiveness).

As the regional RM&E process continues, the goal remains to emphasize the collection of "comparable and compatible" data, and enable opportunities to have Basin-wide consistency and comparability in data sets and data sharing. As mentioned in the MERR, and emphasized by CBFWA members, we need collaboration and coordination among resource managers, develop appropriate methodologies to meet specific regional RM&E needs, while simultaneously affording the Program linkages to Sub-basin, State, and Tribal conservation strategies.

Sincerely
/S/ Scott Soultz
Scott Soultz, Wildlife Division Mgr.