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Sent: Friday, April 09, 2010 2:25 PM
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Cc: 'bquan@cbfwa.org'; Brian Lipscomb; Dave Ward; Jann Eckman; 'neil.ward@cbfwa.org'; Trina Gerlack
Subject: MAG Follow Up: CBFWA analysis of MERR document
Attachments: CBFWA staff DRAFT MERR Analysis Apr9.dot; CBFWA staff Draft MERR letter Apr9.dot

The Northwest Power and Conservation Council (Council) has requested public comment on its Draft Monitoring, Evaluation, Research and Reporting (MERR) Plan by April 26, 2010 (<http://www.nwcouncil.org/library/2010/2010-04.htm>).

At the April 6, 2010 MAG meeting, the MAG directed CBFWA staff to write a policy and technical analysis for review and potential use by individual members in drafting comments to the Council. The MAG also requested that CBFWA staff provide a draft letter that could be used by individual members in their comments.

Please find attached a draft policy and technical analysis of the MERR and a draft letter for your review and consideration. The MAG determined that it would be best if each Member of CBFWA submitted their own comments and letter; however, the MAG did not rule out a common letter under CBFWA letterhead if MAG members request such an action by April 16.

Please contact me if you have any questions.

Tom Iverson
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DRAFT

Policy and Technical Analysis of The Northwest Power and Conservation Council's Monitoring, Evaluation, Research and Reporting Plan

April 9, 2010

Purpose of the Monitoring, Evaluation, Research and Reporting (MERR) Plan:

The MERR was developed as work from the Anadromous Salmonid Monitoring Strategy (ASMS) Workshops held at Skamania, Washington in the Fall of 2009 revealed the need for an overarching monitoring framework that built on the Basinwide Strategies of the 2009 Fish and Wildlife Program. The purpose of the workshops in Skamania was to develop a coordinated anadromous fish monitoring framework and strategy to support the FCRPS Biological Opinion, the Northwest Power and Conservation Council's (Council) Fish and Wildlife Program (Program), and other fish and wildlife management plans. The Council representatives and others determined that better context was needed to assure the framework of the ASMS would be developed consistently with resident fish and wildlife monitoring strategies. Another purpose was to ensure funding priorities were set appropriate to the goals and objectives of the Program. There is an ongoing perception that monitoring within the Program is ad-hoc, disorganized, and too expensive. Therefore, Council staff developed the draft MERR document to set into context all monitoring for the Program. This is the first public draft of this document and the Council welcomes all comment and input.

The MERR sets an overall framework that individual anadromous fish, resident fish, wildlife and habitat monitoring strategies can fit within. Those strategies will be developed separately, but consistently, and added to the MERR as they are completed. These strategies, based on MERR guidance, will set the funding priorities that support the Program and help evaluate its effectiveness. These monitoring strategies will provide the priority information that should be collected to build annual assessments for program implementation, focal species status and trends, and strategy and action effectiveness. The assessments will then guide future consideration of program direction.

FY2010 CBFWA Work Plan:

The Members of the Columbia Basin Fish and Wildlife Authority (CBFWA) have undergone a comprehensive review of the role and functions that the CBFWA organization can serve for the Basin's fish and wildlife managers and for the region. The Members adopted policy directives that relate directly to development and implementation of the MERR Plan. The Members directed their representatives and CBFWA staff to (1) participate in and support ongoing assessments of the status of the species and implementation of strategies and actions to help determine if protection, mitigation, and enhancement efforts are successful in the Columbia River Basin, (2) maintain a "Status of the Resources" (SOTR) website and annually prepare a written report summarizing the current information provided on the website; and, (3) monitor and report on activities of key regional forums where policies, programs, and actions that affect fish and wildlife are planned and implemented.

MERR Relationship to CBFWA Policy Directives:

The MERR document could provide guidance for how CBFWA can most effectively implement the policy directives. The anadromous fish managers will be completing their first iteration of the ASMS to support the Council's M&E Categorical review in the next few weeks. The

Wildlife Advisory Committee (WAC) is relying on early drafts of the ASMS and MERR to guide development of a Wildlife Monitoring Implementation Strategy to support building basin wide wildlife assessments to support the SOTR. The Resident Fish Advisory Committee (RFAC) has determined that monitoring strategies for White Sturgeon, Bull Trout, Reservoir/Lake Specific Fish Species, and Resident Trout should be developed separately, and have developed a timeline to facilitate development of individual strategies consistent with the ASMS and the draft MERR.

Successful development and implementation of these monitoring strategies will benefit the CBFWA Members, as well as, provide critical information and analysis for the Council and BPA to effectively implement and evaluate the Fish and Wildlife Program. While it is appropriate for the agencies and tribes to take the lead in developing these monitoring strategies, it is also imperative that the Council and others participate and appreciate the complexities of monitoring strategies for multiple purposes and to ensure that non-CBFWA members have their interests represented.

Specific Comments on the MERR:

Linkage to subbasin plans-

The MERR does not appear consistent with subbasin plans (i.e., priority species and habitat characteristics identified in Appendix 4) and should be consistent with the priorities currently in those documents and in the amendments recommendations submitted for the 2009 Fish and Wildlife Program. The CBFWA Members should confirm that their priority species and habitat characteristics within their subbasins are accurate in this document. The document acknowledges that the priorities identified in the MERR address High Level Indicators; however, this emphasizes the point that we do not have high level biological indicators for wildlife and resident fish, other than HUs for wildlife acquisitions. The MERR could provide guidance to develop those priorities when developing the individual monitoring strategies.

Page 21, Types of monitoring – The MERR should be clear that HEP is Compliance Monitoring for wildlife mitigation actions funded by BPA and the Program needs a strategy for supporting Status and Trend and Action Effectiveness monitoring for wildlife populations and their habitat to support basin wide assessments. The HEP surveys can provide some of the information for these other monitoring needs, but the procedure was not designed to address the management questions associated with these types of monitoring.

Appendix 2: Council 2009 Program's Quantitative Performance Standards

- These are focused solely on anadromous fish.
- Is HU mitigation at a rate of 2:1 a performance standard? Should it be?

Appendix 4: Priority Species and Habitat Characteristics

- Need to add Chum and Mt. Whitefish to fish species (and possibly others?). CBFWA Members need to compare their Subbasin Plans and management plans against the list of priority species and habitats and submit specific comments.
- The list of priority wildlife species is HEP oriented and incomplete as far as the species that the agencies and tribes are managing. This list should be compared with the subbasin plans to ensure its completeness and accuracy.

- The habitat characteristics are focused on anadromous fish attributes and should be broadened to represent resident fish and wildlife.
- The Council should ensure that all the lists of priority species are consistent with subbasin plans.

Role of Status of the Resource Report

The MERR provides an opportunity to identify the role and function of the SOTR, along with BPA and NPCC web tools, in support of Program implementation and evaluation (as suggested in the CBFWA 2008 Program amendments). The fish and wildlife managers have made the SOTR their priority for reporting biological information and this message could be sent to the NPCC. The Council should clarify the difference between the Program Synopsis and the SOTR to ensure that redundant reporting activities are avoided.

The Council raises a significant policy question on the top of Page 33. The Council indicates that Bonneville should assist projects in reporting biological data by “providing a common database platform such as the Taurus database. The Council also asks that Bonneville investigate ways to facilitate sharing of project implementation and biological data among other entities funding fish, wildlife, and habitat actions in the Basin.” Through the CBFWA work plan, the Members of CBFWA have agreed to begin working towards common, repeatable, ongoing assessments for fish and wildlife and their habitat in the Basin. The Members need to consider how data sharing will occur to make this a reality. The continuation of the Anadromous Monitoring Strategy workshops will begin tackling this issue immediately following the April 20, 2010 CBFWA Members meeting.

Table. Conceptual interaction between web tools.

-Planning- Online Multi-Year Action Plans (NPCC)	-Implementation- Taurus (BPA)	-Evaluation- Status of the Resource Project (CBFWA)
		Status and Trends
<i>Biological Objectives*</i>		Biological Objectives
Limiting Factors		Limiting Factors
Existing and Proposed Actions (Measures – not detailed)	Project Details (Actions)	
Actions linked to limiting factors	Program Accomplishments	Program Accomplishments
<i>Expected Outcomes*</i>	High Level Indicators	High Level Indicators
		Fish and Wildlife Indicators
		Hatchery Performance
Sequence of Work (Priority)		
M&E Needs		
Estimated action costs through 2018	BPA Program/Project Funding	Program Funding Summaries (multiple sources)

**Will not be included in Multi-year Action Plans under current planning assumptions.*

Page 7, Strategic Plan for Monitoring, Evaluation, Research and Reporting – Several of the bullets under Expectations describe functions that the SOTR currently performs for the Program, possibly creating redundant RME efforts.

Page 9, Policy Guidance – Third bullet, delete “use protocols approved by the Council” and keep footnote attached to “analyses.” This statement creates unnecessary confusion regarding the Council’s authority to require specific monitoring protocols for fish and wildlife management actions.

Page 22, Monitoring Approach – In the last paragraph, delete the statement “and will use protocols approved by the Council” and keep the footnote attached to the word “analyses.”

Page 27, Evaluation and Reporting Approach – Does the SOTR have a role in the functions listed here?

Page 30, Program Synopsis – This sounds like a description of the Status of the Resource Report. Need fuller description of the role of Taurus, SOTR, and Council’s MYAP web-based database and how these three web support tools can work together to support the Program Synopsis (see Table above).

Regional Database for Biological Data

Page 23, Compliance, Implementation, and Performance Monitoring – This section refers to data in several instances, but is not clear if the data is project level data or biological data. The last two paragraphs on Page 24 neglect to identify a role for the SOTR. This section would benefit from a clear definition of roles for PISCES, Taurus, and the SOTR.

Page 33, Data Management and Sharing Requirements Approach – The agencies and tribes have not agreed that Taurus or PISCES is the appropriate location for storing biological data.

Work on Monitoring Implementation Strategies Has Begun

With the adoption of the 2010 CBFWA work plan, the technical committees in CBFWA have begun developing strategies to complete basin wide assessments for fish and wildlife in the Columbia River Basin. Those efforts are relying on the draft MERR document and are building off the outline presented for monitoring implementation strategies on Page 34. It is anticipated that when the Council begins to work on individual implementation strategies, they will reach out to CBFWA and join our effort already underway. In that way, the Council can ensure all stakeholders are represented in the construction of those strategies to their satisfaction.

Page 34, Standardized Approach for Implementation Strategies – The AFAC, WAC, LTWG, and RFAC are developing the Wildlife Monitoring Implementation Strategy on an earlier timeframe than the Council describes.

Implementation of MERR

We would like to better understand how this document will be implemented. The Council should be encouraged to adopt the MERR as a policy guidance document while the implementation strategies are being developed. Once those strategies are complete, which will require iterative adjustments to the MERR itself, then the Council should consider adoption of the MERR and associated implementation strategies into the Program during the next 5-year update.

DRAFT. For CBFWA member review.

April XX, 2010

Nancy Leonard
Northwest Power & Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

Dear Dr. Leonard,

Thank you for the opportunity to comment on the draft *Columbia River Basin Monitoring, Evaluation, Research, and Reporting Plan* (Plan). This plan is well written and establishes a monitoring and reporting framework for the Northwest Power and Conservation Council's (Council) Fish and Wildlife Program (Program). From a technical perspective, the Plan provides the guidance for sound decision making regarding monitoring and evaluation. However, from a policy perspective, the Plan raises several issues the region should consider.

- 1) The Plan is not consistent with priorities in the subbasin plans. Several priority species and habitat characterizations are missing from the lists included in Appendix 4. While we understand that list is intended to represent high level indicators for basinwide reporting, better alignment with the subbasin plans should occur before a final Plan is approved. Additional guidance to the groups developing the Implementation Strategies may be necessary to help complete the prioritized list for resident fish and wildlife where basinwide priorities are missing from the current Program.
- 2) The Plan provides an opportunity to identify the role and function of the Status of the Resource Report (SOTR), along with BPA and NPCC web tools, in support of Program implementation and evaluation. With the adoption of the CBFWA FY2010 work plan, the fish and wildlife managers have made the SOTR their priority for reporting biological information for the Program. It is not clear how the Program Synopsis differs from the SOTR. The CBFWA Members would like to work with the Council to ensure the SOTR portion of the synopsis is adequately described and completed.
- 3) On Page 33 of the Plan, the Council asks BPA to take a lead role in developing a common database for biological information and to help facilitate sharing biological data among entities within the basin. There are references elsewhere in the document in this regards. While we agree that BPA should be involved in this conversation, we do not agree that BPA should manage a master database of biological information to support Program evaluation. We are currently engaged in this conversation for listed anadromous fish through CBFWA and PNAMP, in partnership with BPA, and believe that our efforts there could be a model for developing data sharing networks for resident fish and wildlife. This section of the Plan could better represent the partnerships that will be required to successfully share, assess, and report the information necessary to support

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DRAFT. For CBFWA member review.

Program evaluation. Through development of the FY2010 CBFWA work plan, the fish and wildlife agencies and tribes have committed to supporting basinwide assessments of status and trends for fish, wildlife, and their habitats.

- 4) The technical committees in CBFWA have begun to facilitate efforts, with CBFWA members and non-members, to develop implementation strategies for fish and wildlife in the Columbia River Basin. These efforts are relying on the draft Plan document and are building off the outline presented for monitoring implementation strategies on Page 34. It is anticipated that when the Council begins to work on individual implementation strategies, they will reach out to CBFWA and join our effort already underway. In that way, the Council can ensure all stakeholders are represented in the construction of those strategies to their satisfaction. We look forward to working with staff to complete these strategies as quickly as possible.
- 5) Finally, we would like to better understand how this document will be implemented. We encourage the Council to consider adopting the Plan as a policy guidance document while the implementation strategies are being developed. Once those strategies are completed, we encourage the Council to consider adopting the Plan and the associated implementation strategies into the Program during the next 5-year update.

We support this effort to develop a monitoring and evaluation framework for the Program and look forward to working with you in the future.

Signed,

XXXXXXX

Agency/Tribe

CC: Council members

BPA

CBFWA members

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