



COLUMBIA BASIN FISH AND WILDLIFE AUTHORITY

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Coordinating and promoting effective protection and restoration of fish, wildlife, and their habitat in the Columbia River Basin.

The Authority is comprised of the following tribes and fish and wildlife agencies:

Burns Paiute Tribe

Coeur d'Alene Tribe

Confederated Salish and Kootenai Tribes of the Flathead Reservation

Confederated Tribes of the Colville Reservation

Confederated Tribes of the Umatilla Indian Reservation

Confederated Tribes of the Warm Springs Reservation

Confederated Tribes and Bands of the Yakama Nation

Idaho Department of Fish and Game

Kootenai Tribe of Idaho

Montana Fish, Wildlife and Parks

National Marine Fisheries Service

Nez Perce Tribe

Oregon Department of Fish and Wildlife

Shoshone-Bannock Tribes of Fort Hall

Shoshone-Paiute Tribes of Duck Valley

U.S. Fish & Wildlife Service

Washington Department of Fish and Wildlife

Coordinating Agencies

Columbia River Inter-Tribal Fish Commission

Upper Columbia United Tribes

Compact of the Upper Snake River Tribes

June 12, 2008

Mr. Bill Booth, Chairman
Northwest Power and Conservation Council
851 SW Sixth Avenue, Suite 1100
Portland, OR 97204-1348

Dear Chairman Booth:

Thank you for the opportunity to provide comments on the Columbia River Basin Fish and Wildlife Program (Program) amendment recommendations submitted to the Northwest Power and Conservation Council (Council) on April 4, 2008. The agencies and Tribes of the Columbia Basin Fish and Wildlife Authority (CBFWA)¹ have reviewed the recommendations and provide you with these comments for your consideration in amending the Program.

During the agencies and Tribes' review it was noted that some of the recommendations provided by entities other than the CBFWA Members were inconsistent with the recommendations of the eleven tribes, four state, and two federal fish and wildlife managers. Of particular concern were recommendations by the Bonneville Power Administration (BPA) for amending the resident fish and wildlife portions of the Program. The attached table displays the inconsistency in recommendations by summarizing or providing excerpts from the BPA and CBFWA amendments and offering the state and federal fish and wildlife management agencies' and Tribes' recommended resolution to the inconsistencies and, in a few cases, identifying where the amendments are consistent (see Attachments 1 and II). The Members of CBFWA expect the Council to provide due weight to the comments and recommendations of the fish and wildlife managers in the Columbia River Basin, regardless of whether those recommendations are specifically mentioned in the attached table.

In our review, we found no inconsistencies between the recommendations provided by the individual agencies and Tribes of CBFWA and the collective recommendations provided through CBFWA. We also note that the collection of recommendations submitted to the Council by the agencies and Tribes and others provides much of the substantive material necessary to develop a comprehensive Program amendment including multi-year work plans, consistent with the subbasin management plans called for in the 2000 Program (Page 41). We encourage you continue the effort that BPA initiated in the development of the Columbia River Basin Fish Accords, by developing multi-year implementation work plans for the entire geographic scope of the Program. The agencies and Tribes have provided most of the information necessary to support this effort and where additional information is required we stand ready to assist you.

¹ At this time the Confederated Tribes of the Colville Reservation have abstained from the amendment recommendation comments.

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Having work plans to accompany a deliberative comprehensive adaptive management program represents sound resource management. The Council and its partners have completed significant assessment and planning activities over the past seven years and it is time to focus the Program, and BPA funding, in implementing on-the-ground actions. Several agencies and tribes have submitted project and Program specific recommendations that would support development of work plans consistent with the adaptive management framework we submitted on April 4. Where specific actions have not been identified, the agencies and Tribes are prepared to work with the Council to develop appropriate subbasin and systemwide work plans for inclusion in the amended 2008 Fish and Wildlife Program.

In addition to reviewing the suite of recommendations submitted to the Council by the agencies and Tribes and others, we have continued the development of two key elements of the adaptive management framework submitted on April 4. First, considerable time has been spent streamlining the resident fish portion of our recommendations (Section 4) by eliminating redundancies and aligning resident fish populations by common limiting factors and strategies. This has reduced the resident fish section by nearly 100 pages and we are including the revised Section 4 in this transmittal (See Attachment III).

The anadromous fish managers have initiated a comprehensive effort to complete Table 2.1 of our April 4 recommendations. The intent of Table 2.1 is to provide an association between the individual subbasin anadromous fish objectives (natural spawners, hatchery brood stock, harvest, etc.) and the basinwide anadromous fish goals (e.g., halt declining trends in populations, restore widest possible set of healthy populations, increase runs to 5 million anadromous salmonids passing Bonneville Dam, support harvest, etc.). In our efforts to document these associations we found several important issues that deserve additional dialogue and investigation. The anadromous fish managers will continue their work to express the subbasin and population scale objectives in a manner that supports a long term monitoring and reporting program. We invite the Council to participate in this discussion and will be providing additional information during the public comment period following the release of the draft Program amendment.

Sincerely,



Larry Peterman, Chairman
Columbia Basin Fish and Wildlife Authority

Enclosures: 3

- 1) Attachment I: Wildlife Table
- 2) Attachment II: Resident Fish Table
- 3) Attachment III: Resident Fish Section 4 Condensed

cc:

NPCC Members and Staff
CBFWA Members