



COLUMBIA BASIN FISH AND WILDLIFE AUTHORITY

851 SW Sixth Avenue, Suite 300 | Pacific First Building | Portland, OR 97204-1339
Phone: 503-229-0191 | Fax: 503-229-0443 | Website: www.cbfwa.org

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

July 6, 2009

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

Dear Chairman Booth:

The Members of the Columbia Basin Fish and Wildlife Authority (CBFWA) would like to provide comments on the Northwest Power and Conservation Council's (Council) staff funding recommendations for projects in the Wildlife Category Review dated June 15, 2009. We understand that the full Council will be reviewing the staff recommendations at your July meeting and offer these clarifications and comments for your consideration.

The Wildlife Category Review was a useful exercise from many aspects. We agree with the Council staff summary and Independent Science Review Panel (ISRP) report dated May 19, 2009 that the site visits, presentations, and response loop were very positive features of the review. Because the review was topical, it brought much needed focus and transparency to the wildlife portion of the Fish and Wildlife Program (Program). We support the staff recommendation that management plans in conjunction with annual reports become the basis for future reviews. We further support the use of management plans as the funding mechanism for wildlife projects because it would support a more explicit adaptive management approach. The Wildlife Advisory Committee (WAC) of CBFWA is prepared to engage with Council and Bonneville Power Administration (BPA) staff to develop a regionally acceptable format for management plans and annual reports according to the timeline established in the staff recommendations.

The ISRP provided a good clarification of the appropriate use of Habitat Evaluation Procedure (HEP) assessments for crediting purposes while describing the use of biological and effectiveness monitoring for Monitoring and Evaluation (M&E) purposes. Their description should help the region move forward in the ongoing dialogue for developing coordinated wildlife M&E activities across the projects. The apparent confusion between the HEP assessments conducted by the regional HEP team (Project Number 200600600) and the assessments conducted by the individual project sponsors only emphasizes the need to establish the Wildlife Mitigation Crediting Forum (Forum) soon. We believe that a comprehensive schedule for HEP assessments across the basin will be easily developed once the Forum is established and functioning. The project sponsors are still in a transition period for relying on the Regional HEP team to coordinate all assessments across the basin. We are confident that all HEP assessments proposed in the individual projects during the Wildlife Category Review are using a common methodology that is consistent with regional standards and can be fully coordinated in time for FY2010 implementation.

While we appreciate the flexibility of a 5-year funding recommendation for Bonneville Power Administration (BPA) implementation, we are very concerned with the description of how the Council will track its implementation. The 2009 Fish and Wildlife Program adopted the 70-15-15 ratio for distribution of funds across the Program categories

(anadromous fish-resident fish-wildlife); however, the Council staff recommendation provides no clear mechanism for tracking the implementation of this policy. Currently, the wildlife category funding recommendation for your consideration comprises approximately 11% of the total Program funds (including both capital and expense). We would like to see an explanation of how the Council intends to implement this important Program measure and correct this deficiency. We are also concerned with the blanket guidance to BPA for adjusting the project budgets during contracting. Past experience has shown that project integrity is a difficult metric to track. While the current Council staff recommendation would rely on BPA to notify the Council when project integrity is materially altered by budget reductions, it would be helpful if the Council were to articulate what mechanisms are available to project sponsors that believe their project integrity may have been compromised.

Coordination is required for implementation of habitat acquisition and protection projects administered through the BPA funded Fish and Wildlife Program. Coordination occurs at many different scales within a particular project, and external to a project within the greater Program context. Since many of the projects are implemented by agencies and Tribes with status to participate in the adaptive management decision-making framework of the Fish and Wildlife Program, a clear understanding of how coordination is funded within those agencies and Tribes is necessary.

Examples of coordination include:

- within an agency to implement the terms of the contract and ensure consistency and cost-effectiveness of similarly funded activities (project coordination),
- between co-managers to achieve the objectives of the project and ensure consistency and cost effectiveness towards meeting common goals (project coordination),
- with local stakeholders and planning groups to achieve the objectives of the project in the most efficient manner (project coordination),
- coordination between agencies/Tribes and others to ensure that the project implements and supports objectives of the Program (regional coordination), and
- coordination between agencies/Tribes and others to assist with adaptive management at the Program scale (regional coordination).

A total of 17 wildlife proposals included work elements that contained coordination tasks that were external to their individual project. The tasks were presented under five different work elements: 1) Coordination, 2) Disseminate Raw/Summary Data and Results, 3) Manage and Administer Projects, 4) Regional Coordination, and 5) Watershed Coordination. It appears that PISCES Work Elements were not consistently used in the development of project proposals. According to PISCES guidance, coordination which directly supports other project work should be covered in the details of the associated work element. An effort by the wildlife project sponsors to uniformly apply BPA's work element descriptions during contracting could quickly resolve much of the "Regional Coordination Funding" issue raised by Council staff. Additional concerns by Council staff will have to be addressed on a case-by-case basis or through project negotiations with BPA.

Bill Booth, Chairman
Northwest Power and Conservation Council
July 6, 2009
Re: Wildlife Category Review
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We look forward to working closely with the Council during the final steps in developing and implementing the Wildlife Category Review recommendations and continue to offer our expertise and support in this process.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elmer Ward".

Elmer Ward, Chairman
Columbia Basin Fish and Wildlife Authority

cc: NPCC Members & Staff
CBFWA Members