



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

September 3, 2009

Mr. Bill Booth, Chairman
Northwest Power and Conservation Council
851 SW Sixth Avenue, Suite 1100
Portland, OR 77204-1348

Dear Chairman Booth:

Included in the Northwest Power and Conservation Council's (Council) amended Fish and Wildlife Program is a draft environmental risk assessment template, developed by the Independent Scientific Advisory Board (ISAB), which will have to be completed by sponsors of resident fish substitution projects. Per the 2009 amendments, "all proposals for ongoing or new resident fish substitution projects that involve or might involve a non-native species should include an environmental risk assessment of potential negative impacts on native fish species. The ISAB recommended a template for such an environmental assessment. Starting with that template, the Council will work with the ISRP and the appropriate fish and wildlife agencies and tribes to develop the final environmental risk assessment template. In developing the appropriate template, the Council will consider the criteria currently being used by managers to assess the consequences of substitution in the light of the Program's subbasin and basinwide objectives."

The Columbia Basin Fish and Wildlife Authority (CBFWA) has reviewed the template and recommended the following edits:

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1. Description of the proposed resident fish substitution project

c. replace "have you included" with Provide

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4. Distribution and abundance

a. delete "regionally, nationally, and"

b. delete "regionally, nationally, and"

5. Biology and life history

a-g. delete each section in its entirety

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6. Ecological factors and relationships with other species

b. delete "nationally, regionally, and in the basin" and insert immediately after "effects) within the basin (regionally, if information is not available for within the basin).

c. delete "nationally, regionally, and in the basin" and insert immediately after "effects) within the basin (regionally, if information is not available for within the basin).

Chairman Booth
Northwest Power and Conservation Council
September 3, 2009
RE: Resident Fish Advisory Committee Review – ISAB 2008-4 Draft Non-Native
Species Risk Assessment Template
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12. Potential for eradication or control of a resident fish substitution species

a. no edits were provided; however, the committee expressed an interest in continuing discussions regarding this question

14. Input from co-managers and other affected agencies

The RFAC expressed the belief that the steps described under 14 should take place during stage 2 (i.e., following the completion and successful review of the other assessment questions).

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Conclusions for Resident Fish Substitution Projects

“For all resident fish substitution projects that have been approved and implemented, each annual and final report should include a detailed reporting of the results of all monitoring and evaluation that was implemented for assessing negative impacts to native species.”
The CBFWA agrees that monitoring and evaluation is important in assessing the effects of non-native species on natural ecosystems. Subsequently, adequate funding must be made available, by BPA, to allow for sufficient monitoring and evaluation to be performed relative to these types of projects.

The fish and wildlife agencies and Tribes look forward to working with the Council and ISRP to develop the final environmental risk assessment template.

Sincerely,



Elmer Ward, Chairman
Columbia Basin Fish and Wildlife Authority

cc: Council Members and staff
CBFWA Members