Staff summary of Issues & Recommendations
Program Framework

*preliminary draft, please refer to full recommendations for complete review

10/29/2013 10:05 AM

2009 Fish and Wildlife Program Section

Section C Title: The Program Framework (pg 3-5)

Overview

Overall the Council did not receive many recommendations to change the fundamental Fish and Wildlife Program *framework*. Several of the Fish and Wildlife agencies and tribes did, however, recommend that the Program organization be restructured. Some entities recommend that the Program be restructured in order to ensure that mitigation is fairly implemented across the basin. They note that the geographic areas that were most impacted by the development of the hydro-system should be prioritized for mitigation. Many entities also recommended that the Program organization be updated to "better reflect and support adaptive management." They recommend explicitly developing and tracking eight adaptive management steps. The suggestion is to ensure that the Program has linkages from each objectives to the various strategies and then to the specific projects (measures).

In addition, the Council received recommendations from some entities to use an integrated life cycle approach to survival improvements. The Program should consider the entire life cycle when evaluating the benefit of mitigation actions and the Council should support life cycle modeling.

I. Summary

1. Underlying structure of the program framework

- No recommendation to alter the program framework of subbasin-province-basin-wide; scientific foundation and principles etc.

2. Modify Text related to ESA

- CTGR (18) and Cowlitz I.T. (22) recommend making a modification to the language under Program Framework , page 4, expressed in the 2009 Program with these modifications:

".. That is, the Council's Program is designed to link to and accommodate the needs of other programs in the basin that affect fish and wildlife. This includes meeting the needs of the ESA by [delete: *describing the kinds of ecological change needed to improve the survival and-productivity of the diverse fish and wildlife populations in the basin.] [add: implementing the Program to be consistent with ESA regulatory findings in biological opinions and rulemakings; incorporating ESA recovery criteria into Program biological*

objectives; and incorporating ESA recovery plans, including implementation plans, into Basin-wide and subbasin management plans and multi-year action plans.""]

- CTGR (18), Cowlitz I.T. (22) and NPT (25) recommend making a modification to update the current language under Implementation and Performance: *"The Council comprehensively revised the Program in 2000 with the addition of the current program framework, added specific measures and objectives for the mainstem in 2003, and then developed and adopted the subbasin management plans into the Program in 2004-05. Together, these elements provide a coordinated and integrated plan for fish and wildlife actions across the basin. The federal, state, and tribal governments have been working since then with local partners to expand the subbasin plans into ESA recovery plans for areas of the basin that include ESA-listed populations. [delete:The Council is planning a subsequent amendment process in 2009 2010 to other recent planning developments.] [add: Many ESA recovery plans for salmon and steelhead are now complete. Those recovery plans used the 2004-05 subbasin plans and this cycle should continue, so the subbasin plans should now incorporate the final ESA recovery plans."]*
- The Cowlitz I.T. (22) recommend fully integrating the Program with ESA planning activities an ESA recovery plan.

3. Restructuring to support adaptive management

- ODFW (3), WDFW (4), WAGSRO (5), BPT (12), CTGR (18), Cowlitz I.T. (22), NPT (25), USRTF (28)and recommend restructuring the Fish and Wildlife Program to contain or have provisions to explicitly develop or track the following essential adaptive management steps

4. Apply a geographical approach to ensure mitigation is fairly distributed

- The UCUT (27) recommends having geographical objectives to ensure that mitigation is fairly distributed across the basin

5. Clearly link program biological objectives to HLIs and measures

- ODFW (3), WAGSRO (5), UCSRB (7), Cowlitz I.T. (22), USRTF (28) recommend that HLIs should directly relate to quantitative objectives to track progress across management regimes, and inform future actions and investments.
- WAGSRO (5) recommends restructuring and simplifying the Program to provide goals, measurable objectives etc… at the basinwide, province and subbasin scales. All measures should be linked back to specific measureable objectives. The goals and objectives should then guide the development of a data mgmt framework to support specific annual bi-annual and 5 yr reporting requirements.

6. Consider entire life cycle

- UCSRB (7) encourages the Council to work with partners to develop models that are informed by various monitoring results (e.g. Life Cycle Models) and are scalable.
- NOAA-F (30) recommends that survival improvements to considered using an integrated life cycle approach.
- WDFW (4), WAGSRO (5), and Cowlitz I.T. (22) recommend: Consider the complete anadromous fish life cycle and critical habitat needs, including the estuary, plume and

nearshore ocean when making management decisions. Integrate the effects of future climate change into these decisions and develop adaptation strategies to address these effects.

7. **Restructure so not disperse text related to a topic, and not lump text from multiple topics together**
   - IDFG (1) comments that while references to RM&E in the mainstem plan do a good job of referring the reader to the Basinwide Strategies section for detail, the disperse nature of guidance in this area is still confusing
   - IDFG (1) recommends redefining Monitoring and Evaluation into its principle components (Habitat Action Effectiveness Monitoring, Status and Trend Monitoring, and monitoring specifically associated with focused research efforts).

8. **Ecosystem concept within the Program**
   - CRITFC (14) suggests the Council considers incorporating food web concepts and ecosystem management within the Fish and Wildlife Program
   - Native Fish Society (60) develop conceptual framework for salmon and steelhead recovery based on ecosystem function, promoting sustainable wild salmonid productivity, diversity, distribution and abundance.
   - Kootenai T.I. (24) recommends removing the artificial distinction between fish and wildlife as it is particularly problematic in the context of riparian and wetland habitats and is something that the Tribe hopes can be addressed through recognition of the Tribe's integrated fish and wildlife program

II. Framework Recommendations

State F&W Agencies/other state agencies/state supported agencies

Idaho Department of Fish and Game, IDFG (1) (submitted by Paul Kline)

1. Nothing about Program underlying framework
2. Research Monitoring and evaluation (RM&E) Recommendations : Idaho supports a review, reorganization and refocus of language in the current Program document related to RM&E. Currently, sections of the Program that include major references to RM&E include Section II D9, VI D, and VIII H.
3. While references to RM&E in the mainstem plan do a good job of referring the reader to the Basinwide Strategies section for detail, the disperse nature of guidance in this area is still confusing
4. A new concept we hope Council will consider would be to redefine Monitoring and Evaluation into its principle components (Habitat Action Effectiveness Monitoring, Status and Trend Monitoring, and monitoring specifically associated with focused research efforts). Council has invested considerable resources in these areas. The condensed MERR Document (Columbia River Basin Fish and Wildlife Program Draft Guidance for a Balanced and Coordinated Approach for Conducting Monitoring and Research Activities) is a good start and captures the essence of the original MERR document but could be reorganized to define the principal components of Monitoring and

Evaluation. We believe this would help the Council capture momentum recently gained towards identifying efficiencies (and savings) in Action Effectiveness Monitoring. This is the culvert/fence-line discussion that has been going on for some time that has focused appropriate concern on current monitoring and evaluation that may be redundant and unnecessary. If addressed separately from Status and Trend Monitoring we believe the discussion will be more effective

5. <u>Oregon Department of Fish and Wildlife, ODFW (3) (submitted by Tom Rien)</u>

- Nothing about Program underlying framework
- **Recommendation**: Restructure the Fish and Wildlife Program to contain or have provisions to explicitly develop or track the following essential adaptive management steps:
    - Update the current status and trends of the fish and wildlife resources the Program is intended to protect, mitigate, and enhance;
    - Adopt biological objectives and document the current gaps between Program objectives and status for the fish and wildlife resources identified in step 1;
    - Quantify the limiting factors and threats, in terms of their relationship to the biological objectives with associated assumptions, hypotheses and critical unknowns;
    - Adopt strategies and measures linked to limiting factors and threats with a quantification of expected outcomes toward the filling of the gaps identified in step 2;
    - Develop and maintain Research, Monitoring, and Evaluation Plans that will track the status and trends of focal species and their threats and limiting factors, collect the information necessary to test assumptions and hypotheses, address critical uncertainties, and evaluate the implementation of measures;
    - Share through reports, web tools, and other sources the accumulated monitoring and research data and information which will be used to carry out steps 7 and 8;
    - Develop an evaluation process that deliberately contemplates the information from steps 1–6 to verify or adjust assumptions and hypotheses, adjusts biological objectives, and adjusts strategies and measures; and,
    - Establish a process for adjusting the implementation of the Program to align with the changes identified in step 7.
    - Each of these eight adaptive management steps is necessary to achieving transparent, accountable, and effective planning, implementation and evaluation process. In this process, *measures* are the actions, or prescriptions for actions. They implement strategies to address the limiting factors that create the gaps in biological productivity of the focal populations.
- Expand anadromous goals to the Subbasin and Province levels and add specific and measurable objectives for resident fish and wildlife to support high level indicators.
- The Council should report annually on progress towards achieving the Basin-Level Biological Objectives as presented in the Program. The reporting section of the Program (Section VII.E) should be expanded to include reporting high level indicators that represent the Program's basin-level biological objectives as reported in Section II.C of the current Program.

6. **Washington Department of Fish and Wildlife, WDFW (4), (submitted by Amy Windrope)**
   - Nothing about Program underlying framework
   - Restructure the Fish and Wildlife Program to contain or have provisions to explicitly develop or track the following essential adaptive management steps:
     - Update the current status and trends of the fish and wildlife resources the Program is intended to protect, mitigate, and enhance;
     - Adopt biological objectives and document the current gaps between Program objectives and status for the fish and wildlife resources identified in step 1;
     - Quantify the limiting factors and threats, in terms of their relationship to the biological objectives with associated assumptions, hypotheses and critical unknowns;
     - Adopt strategies and measures linked to limiting factors and threats with a quantification of expected outcomes toward the filling of the gaps identified in step 2;
     - Develop and maintain Research, Monitoring, and Evaluation Plans that will track the status and trends of focal species and their threats and limiting factors, collect the information necessary to test assumptions and hypotheses, address critical uncertainties, and evaluate the implementation of measures;
     - Share through reports, web tools, and other sources the accumulated monitoring and research data and information which will be used to carry out steps 7 and 8;
     - Develop an evaluation process that deliberately contemplates the information from steps 1–6 to verify or adjust assumptions and hypotheses, adjusts biological objectives, and adjusts strategies and measures; and,
     - Establish a process for adjusting the implementation of the Program to align with the changes identified in step 7.

     Each of these eight adaptive management steps is necessary to achieving transparent, accountable, and effective planning, implementation and evaluation process. In this process, *measures* are the actions, or prescriptions for actions. They implement strategies to address the limiting factors that create the gaps in biological productivity of the focal populations.
   - 14. Fully Incorporate Estuary, Plume and Nearshore Ocean in Program Measure 2: Consider the complete anadromous fish life cycle and critical habitat needs, including the estuary, plume and nearshore ocean when making management decisions. Integrate the effects of future climate change into these decisions and develop adaptation strategies to address these effects.

7. **<u>Washington State Governor's Salmon recovery Office, WAGSRO (5) (submitted by Brian Abbott)</u>**
   - Nothing about Program underlying framework
   - (restructure program section Recommendation 1): the council should take the lead in articulating a min set of data for specific types of projects, and to have those data analyzed and reported in a consistent manner at the appropriate scale. The council can work with local partners to develop and evaluate HLI that will be routinely monitored, updates, and presented to stakeholders. These HLIs should directly relate to quantitative

objectives to track progress across management regimes (see below) and inform future actions and investments

- (restructure program recommendation 2) : restructure the fish and wildlife program to contain or have provisions to explicitly develop or track the following essential adaptive management steps: (same 8 steps listed under the Burns Paiute Tribe below)
- (data mgmt section, measure2) A clear set of measurable biological objectives at various scales within the Program (high level indicators) could provide a top-down monitoring framework with which to guide data management infrastructure. A plan and process for reporting against those objectives could serve as an adaptive management tool for evaluating success of strategies and actions within the Program at each level.
- (data mgmt section, measure2) Restructure and simplify the Program to provide goals, measurable objectives etc… at the basinwide, province and subbasin scales. All measures should be linked back to specific measureable objectives. The goals and objectives should then guide the development of a data mgmt framework to support specific annual bi-annual and 5 yr reporting requirements.
- 14. Fully Incorporate Estuary, Plume and Nearshore Ocean in Program Measure 2: Consider the complete anadromous fish life cycle and critical habitat needs, including the estuary, plume and nearshore ocean when making management decisions. Integrate the effects of future climate change into these decisions and develop adaptation strategies to address these effects.

Tribes/ Tribal Organizations

8. Upper Columbia Salmon Recovery Board, UCSRB (7) (submitted by Derek Van Marter)

- Nothing about Program underlying framework
- The Council can work with local partners like the UCSRB to develop and evaluate High Level Indicators that will be routinely monitored, updated, and presented to stakeholders. These HLIs should directly relate to quantitative objectives to track progress across management regimes, and inform future actions and investments.
- We encourage the Council to work with partners to develop models that are informed by various monitoring results (e.g. Life Cycle Models) and are scalable.

9. <u>Burns Paiute Tribe, BPT (12) (submitted by Jason Kesling)</u>

10. Nothing about Program underlying framework

- Support recommendations from the "Columbia River Basin Fish and Wildlife Manager's Draft Reference for Developing 2014 Fish and Wildlife Program Amendment Recommendations FINAL"
- Current Program: Page 3, Program Framework, and throughout Recommendation: Restructure the Fish and Wildlife Program to contain or have provisions to explicitly develop or track the following essential adaptive management steps:
  1) Update the current status and trends of the fish and wildlife resources the Program is intended to protect, mitigate, and enhance;
  2) Adopt biological objectives and document the current gaps between Program objectives and status for the fish and wildlife resources identified in step 1;

3) Quantify the limiting factors and threats, in terms of their relationship to the biological objectives with associated assumptions, hypotheses and critical unknowns;
4) Adopt strategies and measures linked to limiting factors and threats with a quantification of expected outcomes toward the filling of the gaps identified in step 2;
5) Develop and maintain Research, Monitoring, and Evaluation Plans that will track the status and trends of focal species and their threats and limiting factors, collect the information necessary to test assumptions and hypotheses, address critical uncertainties, and evaluate the implementation of measures;
6) Share through reports, web tools, and other sources the accumulated monitoring and research data and information which will be used to carry out steps 7 and 8;
7) Develop an evaluation process that deliberately contemplates the information from steps 1–6 to verify or adjust assumptions and hypotheses, adjusts biological objectives, and adjusts strategies and measures; and,
8) Establish a process for adjusting the implementation of the Program to align with the changes identified in step 7.

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11. Columbia River Inter-Tribal Fish Commission, CRITFC (14) (submitted by Aja DeCoteau)

- Nothing about Program underlying framework
- **2.0 Program Framework and Basinwide Vision, Scientific Principles, Objectives, and Substantive Strategies*2.3 Food Web Concepts*** Recommendation: The Council shall consider incorporating food web concepts and ecosystem management within the Fish and Wildlife Program. The first steps may include investigations of species and topics where current knowledge is limited, such as freshwater mussels, lamprey, sturgeon and toxics.

12. Confederated Tribes of Grand Ronde CTGR (18) (submitted by Lawrence Schwabe**)**

- Nothing about Program underlying framework
- B.1 Amendments to Program Framework. Recommendation 1: the Program should integrate with ESA. Maintain the current language under Program Framework , page 4, expressed in the 2009 Program with medications: "..[delete: *describing the kinds of ecological change needed to improve the survival and-productivity of the diverse fish and wildlife populations in the basin.] [add: implementing the Program to be consistent with ESA regulatory findings in biological opinions and rulemakings; incorporating ESA recovery criteria into Program biological objectives; and incorporating ESA recovery plans, including implementation plans, into Basin-wide and subbasin management plans and multi-year action plans."*"]
- B.2 Amendments to Implementation and Performance **Recommendation** 2: Update the current language under Implementation and Performance, page 5, expressed in the 2009 Program with modifications shown here: *"The Council comprehensively revised the Program in 2000 with the addition of the current program framework,*

added specific measures and objectives for the mainstem in 2003, and then developed and adopted the subbasin management plans into the Program in 2004-05. Together, these elements provide a coordinated and integrated plan for fish and wildlife actions across the basin. The federal, state, and tribal governments have been working since then with local partners to expand the subbasin plans into ESA recovery plans for areas of the basin that include ESA-listed populations. [delete:The Council is planning a subsequent amendment process in 2009 2010 to other recent planning developments.] [add: Many ESA recovery plans for salmon and steelhead are now complete. Those recovery plans used the 2004-05 subbasin plans and this cycle should continue, so the subbasin plans should now incorporate the final ESA recovery plans."]

- **Recommendation 3 —** The last paragraph on page 5 states that "The focus of the Program and the Council now turns to performance". Adaptive management principles increase effectiveness and efficiencies. Restructure the Fish and Wildlife Program to contain or have provisions to explicitly develop or track the following essential adaptive management steps:
    1) Update the current status and trends of the fish and wildlife resources the Program is intended to protect, mitigate, and enhance;
    2) Adopt biological objectives and document the current gaps between Program objectives and status for the fish and wildlife resources identified in step 1;
    3) Quantify the limiting factors and threats, in terms of their relationship to the biological objectives with associated assumptions, hypotheses and critical unknowns;
    4) Adopt strategies and measures linked to limiting factors and threats with a quantification of expected outcomes toward the filling of the gaps identified in step 2;
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    8) Establish a process for adjusting the implementation of the Program to align with the changes identified in step 7.

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13. Cowlitz Indian Tribe, Cowlitz I.T. (22)(Submitted by William Iyall)

- Nothing about Program underlying framework

- Fully integrate the Plan with Endangered Species Act planning activities and products The Lower Columbia Salmon Recovery and Fish & Wildlife Subbasin Plan published by the LCFRB in 2004 was adopted by NOAA in 2006 as an interim ESA recovery plan and by the Council in 2005 as the subbasin plan for 8 lower Columbia subbasins. The plan was updated in 2010 and incorporated into the broader Lower Columbia ESU plan adopted by NOAA in July 2013. These plans provide the framework of goals, strategies, measures, and actions guiding recovery efforts throughout the Lower Columbia. This planning effort has been further refined with the development of site specific restoration assessments in several subbasins. The Council should incorporate the Recovery Plan and associated habitat strategies and project identification assessments to speed progress toward biological objectives, and support close coordination between recovery partners between plan updates.
- ***5.2 Integration with Endangered Species Act*** Maintain the current language under Program Framework , page 4, expressed in the 2009 Program with medications: "..[delete: *describing the kinds of ecological change needed to improve the survival and-productivity of the diverse fish and wildlife populations in the basin.] [add: implementing the Program to be consistent with ESA regulatory findings in biological opinions and rulemakings; incorporating ESA recovery criteria into Program biological objectives; and incorporating ESA recovery plans, including implementation plans, into Basin-wide and subbasin management plans and multi-year action plans."*"]
- B.2 Amendments to Implementation and Performance **Recommendation** 2: Update the current language under Implementation and Performance, page 5, expressed in the 2009 Program with modifications shown here: *"The Council comprehensively revised the Program in 2000 with the addition of the current program framework, added specific measures and objectives for the mainstem in 2003, and then developed and adopted the subbasin management plans into the Program in 2004-05. Together, these elements provide a coordinated and integrated plan for fish and wildlife actions across the basin. The federal, state, and tribal governments have been working since then with local partners to expand the subbasin plans into ESA recovery plans for areas of the basin that include ESA-listed populations. [delete:The Council is planning a subsequent amendment process in 2009 2010 to other recent planning developments.] [add: Many ESA recovery plans for salmon and steelhead are now complete. Those recovery plans used the 2004-05 subbasin plans and this cycle should continue, so the subbasin plans should now incorporate the final ESA recovery plans."]*
- Current Program: Pages 3-4, The Program Framework, and throughout
- Restructure the Fish and Wildlife Program to contain or have provisions to explicitly develop or track the following essential adaptive management steps:
    - Update the current status and trends of the fish and wildlife resources the Program is intended to protect, mitigate, and enhance;
    - Adopt biological objectives and document the current gaps between Program objectives and status for the fish and wildlife resources identified in step 1;
    - Quantify the limiting factors and threats, in terms of their relationship to the biological objectives with associated assumptions, hypotheses and critical unknowns;

- Adopt strategies and measures linked to limiting factors and threats with a quantification of expected outcomes toward the filling of the gaps identified in step 2;
- Develop and maintain Research, Monitoring, and Evaluation Plans that will track the status and trends of focal species and their threats and limiting factors, collect the information necessary to test assumptions and hypotheses, address critical uncertainties, and evaluate the implementation of measures;
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- Establish a process for adjusting the implementation of the Program to align with the changes identified in step 7.

Each of these eight adaptive management steps is necessary to achieving transparent, accountable, and effective planning, implementation and evaluation process. In this process, *measures* are the actions, or prescriptions for actions. They implement strategies to address the limiting factors that create the gaps in biological productivity of the focal populations.

- Restructure and simplify the Program to provide Goals, Measurable Objectives, Strategies and Measures at the Basinwide, Province and Subbasin scale. All measures should be linked back to specific measurable objectives. The goals and objectives should then guide the development of a data management framework to support specific annual, bi-annual, and five year reporting requirements;
- The Council should report annually on progress towards achieving the Basin-Level Biological Objectives as presented in the Program. The reporting section of the Program (Section VII.E) should be expanded to include reporting high level indicators that represent the Program's basin-level biological objectives as reported in Section II.C of the current Program.
- ***7.1 Fully Incorporate Estuary, Plume and Nearshore Ocean in Program*** Current Program: various sections Measure 2: Consider the complete anadromous fish life cycle and critical habitat needs, including the estuary, plume and nearshore ocean when making management decisions. Integrate the effects of future climate change into these decisions and develop adaptation strategies to address these effects.

Kootenai Tribe of Idaho, Kootenai T.I. (24) (submitted by Sue Ireland)

- Nothing about Program underlying framework
- **2.1 Kootenai Tribe Integrated Fish and Wildlife Program , 2.1.1 Need for Kootenai Tribe Integrated Fish and Wildlife Program:** Although the Kootenai Tribe experiences fish, wildlife and their habitats as part of an ever evolving and interdependent ecosystem, the Council's Program and associated project funding maintains an artificial distinction between fish and wildlife. This distinction is reflected in the presentation of aquatic and terrestrial limiting factors in the Kootenai River Subbasin Plan and in the Council's project review and funding cycle. It is a distinction that is particularly problematic in the context of riparian and wetland habitats and is something that the Tribe hopes can be addressed through recognition of the Tribe's integrated fish and wildlife program.

Nez Perce Tribe, NPT (25) (submitted by David Johnson)

- Nothing about Program underlying framework
- **Section IC. Introduction - The Program Framework** Page 3, and throughout. Recommendation: Restructure the Fish and Wildlife Program to contain or have provisions to explicitly develop or track the following essential adaptive management steps:
    1) Update the current status and trends of the fish and wildlife resources that the Program is intended to protect, mitigate, and enhance;
    2) Adopt biological objectives and document the current gaps between Program objectives and status for the fish and wildlife resources identified in step 1;
    3) Quantify the limiting factors and threats, in terms of their relationship to the biological objectives with associated assumptions, hypotheses and critical unknowns;
    4) Adopt strategies and measures linked to limiting factors and threats with a quantification of expected outcomes toward the filling of the gaps identified in step 2;
    5) Develop and maintain Research, Monitoring, and Evaluation Plans that will track the status and trends of focal species and their threats and limiting factors, collect the information necessary to test assumptions and hypotheses, address critical uncertainties, and evaluate the implementation of measures;
    6) Share through reports, web tools, and other sources the accumulated monitoring and research data and information which will be used to carry out steps 7 and 8;
    7) Develop an evaluation process that deliberately contemplates the information from steps 1-6 to verify or adjust assumptions and hypotheses, adjusts biological objectives, and adjusts strategies and measures; and,
    8) Establish a process for adjusting the implementation of the Program to align with the changes identified in step 7.

    Each of these eight steps is required to support a transparent, accountable, and effective planning, implementation and evaluation process. In this process, *measures* are the actions, or prescriptions for actions. They implement strategies to address the limiting factors that create the gaps in biological productivity of the focal populations.
- Section ID. Introduction - Implementation and Performance, Page 5, first paragraph. Reword to: "The Council comprehensively revised the Program in 2000 with the addition of the current program framework, added specific measures and objectives for the mainstem in 2003, and then developed and adopted the subbasin management plans into the Program in 2004-05. Together, these elements provide a coordinated and integrated plan for fish and wildlife actions across the basin. The federal, state, and tribal governments have been working since then with local partners to expand the subbasin plans into ESA recovery plans for areas of the basin that include ESA-listed populations. Many ESA recovery plans for salmon and steelhead are now complete. Those recovery plans used the 2004-05 subbasin plans and this cycle should continue, so the subbasin plans should now incorporate the final ESA recovery plans."

14. <u>Upper Columbia United Tribes, UCUT (27) (submitted by DR Michel)</u>

- Nothing about Program underlying framework
- Program's implementation of the vision is flawed, however, because it contains no geographical objectives to ensure that mitigation works is fairly distributed across the basin. (NPCC staff comment – perhaps they want to have the percentage of effort mirror the percentage of losses? E.g., Allocate 45 % of funds to areas above chief Jo and Grand Coulee Dams which have 40% documented losses and produce 50% of electricity as described under Funding Priorities?)
- In addition to the more specific comments that follow, the UCUT urge the Council to make structural changes to the Program in order to ensure that mitigation is fairly implemented across the basin. A more definitive pathway needs to be established to channel resident fish funds to the habitats above Chief Joseph and Grand Coulee dams and other blocked areas, and the Council should seriously consider expanding the resident fish budget and/or funding resident fish substitution efforts out of the anadromous fish allocation. This suggestion is in no way intended to undercut the importance of anadromous fish recovery efforts in the lower or upper river or to divert money away from critical resident fish projects elsewhere in the basin. It is simply intended to underscore the importance of channeling more of the Program's fisheries funds to the area above Chief Joseph and Grand Coulee Dams to more effectively address the multi-generational harvest deficiencies and concomitant cultural harm that the Columbia River hydropower system has visited upon members of the Upper Columbia United Tribes

<u>Upper Snake River Tribes Foundation, USRTF (28) (Submitted by Heather Ray)</u>

- Nothing about Program underlying framework
- Restructure the Fish and Wildlife Program to contain or have provisions to explicitly develop or track the following essential adaptive management steps:
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  - Adopt biological objectives and document the current gaps between Program objectives and status for the fish and wildlife resources identified in step 1;
  - Quantify the limiting factors and threats, in terms of their relationship to the biological objectives with associated assumptions, hypotheses and critical unknowns;
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  - Share through reports, web tools, and other sources the accumulated monitoring and research data and information which will be used to carry out steps 7 and 8;

- Develop an evaluation process that deliberately contemplates the information from steps 1–6 to verify or adjust assumptions and hypotheses, adjusts biological objectives, and adjusts strategies and measures; and,
- Establish a process for adjusting the implementation of the Program to align with the changes identified in step 7.

Each of these eight adaptive management steps is necessary to achieving transparent, accountable, and effective planning, implementation and evaluation process. In this process, *measures* are the actions, or prescriptions for actions. They implement strategies to address the limiting factors that create the gaps in biological productivity of the focal populations.

- Restructure and simplify the Program to provide Goals, Measurable Objectives, Strategies and Measures at the Basinwide, Province and Subbasin scale. All measures should be linked back to specific measurable objectives. The goals and objectives should then guide the development of a data management framework to support specific annual, bi-annual, and five year reporting requirements;
  The Council should report annually on progress towards achieving the Basin-Level Biological Objectives as presented in the Program. The reporting section of the Program (Section VII.E) should be expanded to include reporting high level indicators that represent the Program's basin-level biological objectives as reported in Section II.C of the current Program.

Federal F&W Agencies/Other Federal agencies

15. NOAA Fisheries, NOAA-F (30) (submitted by Elizabeth Gaar)

- Nothing about Program underlying framework
- Life Cycle Context:
  - The Program is generally organized by sector, i.e. habitat, artificial production, harvest, hydrosystem passage, Mainstem, ocean, and estuary. It is important that strategies and actions in each sector not be considered in isolation .The Council should add a strategies section to the Program that says to use an integrated life cycle approach to survival improvements. The primary strategy would be to consider the entire life cycle when evaluating the benefit of mitigation actions
  - The council should support continued research and life cycle modeling to inform decision makers of the biological benefits they could expect from implementing or synchronizing different suites of actions across the life cycle.
  - Lifecycle modeling will help decision-makers understand potential survival outcomes under different sets of assumptions regarding future ocean and climate conditions

Bonneville Customers/other utilities and user groups

None

Environmental /NGOs

16. Native Fish Society (60) (submitted by Bill Bakke)

- Nothing about Program underlying framework
- Develop a conceptual framework for salmon and steelhead recovery based on ecosystem function, promoting sustainable wild salmonid productivity, diversity, distribution and abundance.
- Adopt guidelines, benchmarks, and a basin-level experimental framework specifically for reintroduction of salmon and steelhead into watersheds from which they have been extirpated.

Individuals

None