



# COLUMBIA BASIN FISH AND WILDLIFE AUTHORITY

851 SW Sixth Avenue, Suite 260 | Pacific First Building | Portland, OR 97204-1339 | Phone: 503-229-0191 | Fax: 503-229-0443

October 6, 2006

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 government agencies:

Burns Paiute Tribe

Coeur d'Alene Tribe

Confederated Salish and Kootenai Tribes of the Flathead 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 Department of 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

Mark Walker  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, OR 97204

Dear Mr. Walker:

The Members of the Columbia Basin Fish and Wildlife Authority (CBFWA) would like to provide the following comments and recommendations relative to CBFWA sponsored coordination projects (i.e. Project Number 198906201, *Annual Work Plan CBFWA*; Project Number 200303600, *CBFWA Collaborative Systemwide Monitoring and Evaluation Program*; Project Number 200600600, *Habitat Evaluation Procedures (HEP)*; and Project Number 200732100, *Data Management for System Operations*), in response to the Northwest Power and Conservation Council's (Council) Draft Recommendations for Fiscal Year (FY) 2007-2009.

The Northwest Power Act (Act) calls for the inclusion of fish and wildlife management coordination in the Council's Fish and Wildlife Program (Program):

*839b(h)(2). The Council shall request, in writing, promptly after the Council is established under either subsection (a) or (b) of this section and prior to the development or review of the plan, or any major revision thereto, from the Federal and the region's State fish and wildlife agencies and from the region's appropriate Indian tribes, recommendations for—*

*839b(h)(2)(C). fish and wildlife management coordination and research and development (including funding) which, among other things, will assist protection, mitigation, and enhancement of anadromous fish at, and between, the region's hydroelectric dams. [Northwest Power Act, §4(h)(2)(C), 94 Stat. 2708.]*

Over the past 25 years, a suite of projects, that constitute the elements of the current model for fish and wildlife management coordination as it pertains to the ongoing adaptive management process for fish and wildlife mitigation under the Act, has been implemented to provide coordination to entities throughout the Columbia River Basin. This suite of projects includes:

- Focus Watershed Coordination - Provides for local development, coordination and implementation of sub-basin plans;
- Collaborative Systemwide Monitoring and Evaluation Project (CSMEP) - Provides for the development of coordinated monitoring design;
- StreamNet and Northwest Habitat Institute - Provides for coordination and communication of fish and wildlife management data; and,
- CBFWA - Provides regional coordination and development of regionally coordinated products (see Attachment A for examples).

During the FY 2007-2009 project solicitation, the Council established the Mainstem Systemwide Review Team (MSRT) for the purpose of reviewing proposals and subsequently providing a set of project recommendations within the budget allocated for the Basinwide and Multi-province (On-the-ground) budget categories. The MSRT consisted of representatives from the Region's state, federal, and tribal fish and wildlife

managers, Bonneville Power Administration (BPA), U.S. Army Corps of Engineers, Council staff, and other interested parties. Although the project selection and budget balancing process was considered, by the participants, to be comparable to the processes used in other provinces, the Council's recommendations did not reflect similar deference as was the case for most of the Councils recommendations in the other provinces. The CBFWA Members recommend that the Council support the MSRT recommended budgets for the following projects.

**Project Number 198906201, Annual Work Plan CBFWA -**

*Original Proposal Amount \$2,253,787*

*Reduced MSRT Recommended Amount \$2,071,450*

*Draft NPCC Recommended Amount \$1,885,250 with the following comment:*

*"Interim funding pending further Council review of the appropriate coordination activities. Council draft recommendation is an interim budget level that represented the MSRT recommendation, minus the Kalispel and Spokane requests. Council requests a recommendation from staff in October 06 re tasks, deliverables."*

The CBFWA Members recommend that the Council restore the MSRT recommended budget of \$2,071,450 as the final recommended funding amount for Project Number 198906201, *Annual Work Plan CBFWA*. This represents the amount of funds recommended by the MSRT in the selection process established by the Council. This funding level represents a significant reduction from the original requested funding level, due to the CBFWA members understanding that funds are limited under the upcoming rate period and will require a re-structuring in our proposal.

*In reference to "...minus the Kalispel and Spokane requests."*

Funding for individual fish and wildlife manager participation in each of these elements of management coordination has been provided under the guiding principle that dollars are provided to participate in processes that are pursuing a *coordinated* position. That is not to say that individual fish and wildlife managers do not provide their own sovereign positions when needed, they do; rather it is to say that the current program does not pay for this as part of the larger regional program.

If the Council recommends the funding of the individual Kalispel and Spokane Tribes proposals, it should not do so to the detriment of the remaining 17 fish and wildlife managers in the basin. The Kalispel and Spokane Tribes have been invited to continue to participate in these regional coordination activities (see enclosed letters of invitation). The program paying for manager participation in CBFWA buys the region a *coordinated* response from the fish and wildlife managers and tribes in various aspects of the adaptive fish and wildlife management plan (see Attachment A describing examples of coordinated projects from CBFWA).

The Council could recommend funding of the Kalispel and Spokane Tribes' proposal and stay consistent with the current model contained in the program by pursuing watershed coordinator projects for each of the Tribes. This would provide these Tribes with funding to accomplish local coordination (e.g., project number 199202601, Grand Ronde Model Watershed Program Habitat Restoration – Planning, Coordination and Implementation, Attachment B). Funding to participate in regional coordination is currently available to

Mark Walker, NPCC

October 6, 2006

Page 3

the all the fish and wildlife managers including the Kalispel and Spokane Tribes through the current suite of projects.

Funding pursued outside the context of the current program should not be considered for recommendation. If a programmatic change is warranted the Act establishes clear process for this, which must be followed.

**Project Number 200303600, CBFWA Collaborative Systemwide Monitoring and Evaluation Program -**

*Original Proposal Amount \$1,024,245*

*Reduced MSRT Recommended Amount \$997,500*

*Draft NPCC Recommended Amount \$984,500 with the following comment:*

*Council draft recommendation: Interim funding at reduced level pending further Council consideration of regional monitoring and evaluation framework. Fund for only 2 years (07-08); Council expects a report for Council and science review, delivered by the end of FY 08. ISRP fundable (qualified): address in programmatic issue in the decision document.*

The CBFWA Members recommend that the Council restore the MSRT recommended budget of \$997,500 for **three years** as the final recommended funding amount for Project Number 200303600, *CBFWA Collaborative Systemwide Monitoring and Evaluation Program*. The MSRT employed a systematic process considering all data management projects and their recommendations should be given deference on this issue. The Council draft recommendation does not represent the collaboration that occurred within the MSRT review to find agreement on these projects. The CSMEP proposal received the strongest endorsement by ISRP. Although the Council has acknowledged that developing M&E for the Program is a long-term process, this recommendation contradicts that position, as it does not provide the funding stability for CSMEP to complete its tasks. The states and tribes which implement most of the M&E in the Columbia River Basin need a long-term funding commitment to allow for the retention qualified staff to meet this project's mission.

**Project Number 200600600, Habitat Evaluation Procedures (HEP) –**

Below is a summary of the Council draft recommendation:

*Original Proposal Amount \$341,828*

*Reduced MSRT Recommended Amount \$222,000*

*Draft NPCC Recommended Amount \$222,000 with the following comment:*

*Council draft recommendation: Scope expansion not accepted. Budget at the FY 2006 level.*

The CBFWA Members support the Council's recommendation for this project as it is consistent with the MSRT.

Mark Walker, NPCC  
October 6, 2006  
Page 4

**Project Number 200732100, Data Management for System Operations -**

*Original Proposal Amount \$1,531,414*  
*Reduced MSRT Recommended Amount \$1,500,000*  
*Draft NPCC Recommended Amount \$0 with the following comment*

*"A portion of the unallocated balance will be available for the Council to make final project funding recommendations for fish passage science and analysis"*

The CBFWA Members assert that this is the only project within the current suite of projects which meets the intent of the current Program as it relates to providing funding for the fish and wildlife managers to coordinate their input into system operational decisions and therefore should be recommended for funding by the Council.

Recommendations have been provided and are built into the Program for the coordination of mainstem operations through the Fish Passage Center.

Page 28 of the Columbia River Fish and Wildlife Program States: "This program continues the operation of the Fish Passage Center."

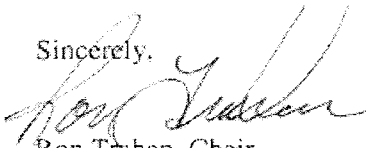
Page 27 of the 2003 Mainstem Amendments to the Columbia River Fish and Wildlife Program dedicates an entire section to the functions of the Fish Passage Center.

Project Number 200732100, *Data Management for System Operations* has been submitted by the fish and wildlife managers of CBFWA and satisfies the language in the program and the Act. The Council must follow its own program in making recommendations.

The CBFWA members support the MSRT recommendations for these four projects. If you have questions please contact Brian Lipscomb at (503) 229-0191.

If you have questions regarding these comments, please contact Brian Lipscomb at (503) 229-0191.

Sincerely,



Ron Trahan, Chair  
Columbia Basin Fish and Wildlife Authority

Enclosures (4)

cc: CBFWA Members  
NPCC Members  
Greg Delwiche, BPA  
Glen Nenema, KT  
Deane Osterman, KT  
Rick Sherwood, STI  
B.J. Kieffer, STI

**Attachment A:** Select examples of coordinated products from CBFWA. For a more detailed description of deliverables, refer to the CBFWA proposal (Project Number 198906201).

**Recent Past:**

- Response & input to the Council's Monitoring and Evaluation Guidance Document
- Response & input to the Council's Research Plan
- Response to the Council's request for comment on the Data Center Proposal
- Development of the automated system for the FY07-09 Project Solicitation process
- Participation in the Budget Oversight Group
- Facilitation of the system-wide program review for projects in the FY2006 start of year budget
- Facilitation of the Mainstem Systemwide Review Team for the FY07-09 project selection process for the Basinwide and Multi-province budget categories
- Facilitation of the white sturgeon technical workshop (report pending)
- Facilitation of the resident fish workshop and 28th international Kokanee Workshop
- Facilitation of the bi-annual fish screening workshop recently held in the Tri-cities
- Facilitation of the project implementation workshop to review Mainstem and Systemwide projects
- Facilitation of the workshop to review the Data Management proposals in the 07-09 project selection process
- Development of the Status of the Resource Project reporting the collective response from the fish and wildlife managers on the status of the regions fish and wildlife resources
- Maintenance of the historical project proposal data base
- Maintenance of the with-in year budget and scope project modification process
- Maintenance of the CBFWA website
- Participation and coordination of the Lamprey Technical Workgroup
- Facilitation of the Anadromous Fish Advisory Committee
- Facilitation of the Resident Fish Advisory Committee
- Facilitation of the Wildlife Advisory Committee
- Development of basin-wide coordinated monitoring efforts (CSMEP project)

**Near Future:**

- Response to the proposed fish and wildlife program amendment process
- Response to the Council's Annual Report to Congress
- Facilitation of input into the regional hatchery review process
- Facilitation of the review of the program to develop long-term O&M standards
- Facilitation of the ISRP requested Kokanee Workshop
- Facilitation of a system-wide predation workshop (product of remand)
- Facilitation of the implementation of the output from CSMEP
- Facilitation of future data management workshops
- Fish and Wildlife Manager recommendations for program amendments
- Status of the Resource interactive website to provide ongoing evaluation of the program
- Facilitation of a bull trout workshop
- Facilitation of ISRP subbasin reviews
- Development of regionally coordinated fish and wildlife management recommendations for amendments to the Council's fish and wildlife program
- Continue to manage within-year budget modification process
- Track and monitor BPA spending

**Attachment B:** Comparing the work elements from the proposals of the Kalispel Tribe and Spokane Tribe to that of the Grande Ronde Model Watershed proposal shows that the objectives are very similar.

**Proposal 200710600: Spokane Tribe Fish and Wildlife Planning and Coordination & Proposal 200716200: Kalispel Tribe Fish and Wildlife Coordination**

Coordination	Participation in Regional Fish and Wildlife Activities	Participate in regional mitigation activities to implement Fish and Wildlife Program. This will include coordinating HEP team schedule, work assignments, policy analysis, ect...
Outreach and Education	Information sharing with regional entities on Spokane Tribal Policies and Programs	Provide for discussion and information sharing with regional fish and wildlife managers, BPA, NPCC on Spokane Tribal policies, Program, and projects
Produce Plan	Assist regional fish and wildlife managers with completion of regional reporting	Assist CBFWA with annual work plan and program wide implementation reporting
Provide Technical Review	Assist in regional fish and wildlife technical reviews of projects	Assist in providing a regional review of projects for funding consideration (Provincial Reviews), funding adjustments, and reallocation of Fish and Wildlife Program funding.

**Proposal 199202601: Grand Ronde Model Watershed Program Habitat Restoration - Planning, Coordination and Implementation**

01: Coordination	Coordinate habitat restoration activities in the Grande Ronde and Imnaha Subbasins	Includes all GRMWP coordination with resource management agencies, regulatory agencies, potential funding sources and landowners
02: Coordination	Regional Coordination	Coordinate in-basin activities with agencies and entities outside the Grande Ronde Subbasin such as OWEB, regulatory agencies, state and federal representatives and NPCC
03: Outreach and Education	Coordinate community outreach activities related to habitat protection/enhancement/restoration	Includes publication of quarterly newsletter, organization of workshops, river cleanups, coordination with agency educational activities, newspaper articles and project tours
04: Identify and Select Projects	Plan, coordinate, develop and review restoration projects for BPA funding	Solicit habitat project proposals, conduct pre-proposal site reviews, coordinate technical site reviews, develop project proposals



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October 6, 2006

Glen Nenema, Chairman  
Kalispel Tribe  
P.O. Box 39  
Usk, WA 99180

Dear Chairman Nenema:

As the Chairman of the Columbia Basin Fish and Wildlife Authority (CBFWA), I am writing to provide an update on several key discussions of regional importance to all of the tribes and other fish and wildlife managers in the Columbia River Basin. As we deliberated on these issues at our recent meeting in Astoria, Oregon, the CBFWA Members continued to note, with regret, the absence of your input to the discussions and invite you to consider participating with the CBFWA whether or not your Tribal Council decides to rejoin as a full member. Because you are an entity with fish and wildlife management authority, there are funds available for your attendance and participation in these meetings and discussions which would cover both time and travel. We could also help to keep you informed by providing you with the agendas and actions notes for our meetings. The CBFWA Members prefer to discuss these issues with your valuable input as we exercise our collective authority to help formulate the policies that affect all of our resources.

As the Northwest Power and Conservation Council (NPCC) works on its final recommendations of projects to mitigate, restore, and enhance fish and wildlife resources affected by the Federal Columbia River Hydropower System (FCRPS), the CBFWA has continued to analyze the total breadth of the Fish and Wildlife Program. Our analysis has been disturbing, and we are concerned that the progress envisioned in the subbasin planning process for the NPCC's Fish and Wildlife Program may be lost through the FY 2007-2009 project selection process due to insufficient funding. We have communicated this concern to the NPCC in a letter to their Chairman dated August 30, 2006; numerous essential needs that will not be met at the current funding level were identified in this communication. Our hope is that this list of needs will be the basis for further discussion with the NPCC, and Bonneville Power Administration to identify more funding opportunities.

In an effort to develop an effective Fish and Wildlife Program evaluation tool that works from a regional prospective and helps the fish and wildlife managers clearly articulate the status of fish and wildlife resources across the region, the Members are currently implementing the Status of the Resources Project and developing the associated *Status of the Resources Report*. This project includes an interactive website that will provide the region with historical project information, the current status of fish and wildlife populations, and the extent to which the managers are attaining regional biological objectives. The CBFWA members envision using the results from this effort to assist in the development of recommendations for any adjustments that need to occur during the NPCC's amendments to the Fish and Wildlife Program. Our plan is to promote this report and website using an aggressive public relations campaign so that all of the region's stakeholders appreciate the value in the efforts of the CBFWA to restore the basin's fish and wildlife resources.

The CBFWA sponsored a Data Management Workshop on September 20-21, 2006, to discuss a data management framework, that will support adaptive management for the NPCC's Fish and Wildlife Program. Key management questions need to be addressed at the basinwide scale regarding how data can be collected, shared, and presented to address these questions. Resolution of these management questions will provide a greater level of detail for CBFWA's Status of the Resource Project. This initial workshop focused on re-prioritizing the data that is managed by StreamNet and the Northwest Habitat Institute. These projects support regional access and distribution of key data necessary to inform regional decision making.

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 government agencies:

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Coeur d'Alene Tribe

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Chairman Nenema  
October 6, 2006  
Page 2

The CBFWA Members recently agreed to reactivate the Fish Passage Center Board of Directors. This action renews and emphasizes the management role of the CBFWA Members in Columbia River issues and management, including river operations. This is an important step that promotes the management role that each CBFWA Member brings to regional decisions associated with the operations of the FCRPS.

Again, the CBFWA Members continue to deliberate these issues and invite your valuable input. The members have worked diligently to address all of the original concerns outlined in your May 2005 letter of withdrawal. As stated in our previous letter, our goal is to be an organization that assists all of the fish and wildlife managers in their efforts to restore Columbia River Basin fish and wildlife resources.

If you would like to join in our discussions or if there is anything else we can do to assist you, please call me (406) 675-2700, ext. 1003, or Brian Lipscomb, the Executive Director of CBFWA, (503) 229-0191.

Sincerely,



Ron Trahan, Chair  
Columbia Basin Fish and Wildlife Authority

Cc: CBFWA Members  
NPCC Members  
Greg Delwiche, BPA





# COLUMBIA BASIN FISH AND WILDLIFE AUTHORITY

851 SW Sixth Avenue, Suite 260 | Pacific First Building | Portland, OR 97204-1339 | Phone: 503-229-0191 | Fax: 503-229-0443

October 6, 2006

Rick Sherwood, Chairman  
Spokane Tribe of Indians  
P.O. Box 100  
Wellpinit, WA 99040

Dear Chairman Sherwood:

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Chairman Sherwood

October 6, 2006

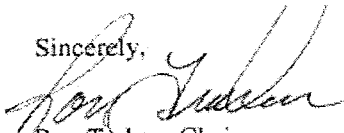
Page 2

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Again, the CBFWA Members continue to deliberate these issues and invite your valuable input. The members have worked diligently to address all of the original concerns outlined in your May 2005 letter of withdrawal. As stated in our previous letter, our goal is to be an organization that assists all of the fish and wildlife managers in their efforts to restore Columbia River Basin fish and wildlife resources.

If you would like to join in our discussions or if there is anything else we can do to assist you, please call me (406) 675-2700, ext. 1003, or Brian Lipscomb, the Executive Director of CBFWA, (503) 229-0191.

Sincerely,



Ron Trahan, Chair

Columbia Basin Fish and Wildlife Authority

Cc: CBFWA Members  
NPCC Members  
Greg Delwiche, BPA



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Mark Walker  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, OR 97204

Dear Mr. Walker:

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) draft recommendations for Fiscal Year (FY) 2007-2009 funding for the Fish and Wildlife Program (Program). We commend the Council for providing a wide variety of entities and interests the opportunity to participate in these discussions and for meaningful input into the Council's decision-making process. In the 25 years since the passage of the Northwest Power Act (Act), many of these entities and interests have never had the quantity and quality of input and participation in Council decision-making as they were provided over the past several months. However, the CBFWA members are concerned that the Council may not be adequately implementing the Program as envisioned in the Act.

The CBFWA members are concerned that there has been inadequate time to prepare comprehensive comments on a process of this significance. The Council's draft recommendations represent annual spending of nearly \$143 million for the next three years and less than three weeks time was allowed for coordinated comment. To make this task more difficult, the basis of many of the decisions reflected in the draft recommendations is unclear and undocumented, and many decisions are inconsistent with or contrary to priorities of the fish and wildlife managers and/or of the groups asked by the Council to evaluate proposals within specific geographic or topic areas. In fact, in many of their specific comments on projects in the Basinwide category the Council defers to the project sponsors to prioritize their own work by stating "Ask sponsor to confirm during comment period what work can be completed at this budget level." The CBFWA members are unable to comment on projects whose priorities are undefined.

The CBFWA members are concerned that the FY 2007-2009 funding level was set arbitrarily by Bonneville Power Administration (BPA) in their rate setting process and did not take into consideration the true cost of adequately implementing the Program as envisioned in the Act. The poor status of Columbia River fish and wildlife resources demands immediate attention. The Act calls for "a Program to protect, mitigate, and enhance fish and wildlife, including related spawning grounds and habitat, on the Columbia River and its tributaries." The current Program is failing by most accounts (e.g., the Council's Program set goals to - reverse the decline of anadromous fish populations by 2005 and to increase runs to 5 million by 2025, restore native resident fish abundance to near historic levels, protect and expand habitat and ecosystem function, and to monitor and evaluate habitat and species responses to wildlife mitigation actions). At the current level of funding the region will be unable to effectively implement the subbasin plan portion of the Program as envisioned and composed by the local subbasin planners. Inadequate funding of the implementation of the Fish and Wildlife Program's

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Mark Walker, NPCC

October 6, 2006

Page 2 of 3

subbasin plans undermines the ability to achieve the Program's goals. Equally important, stakeholder relationships are at risk due to competition for inadequate funds.

The CBFWA members call on the Council to initiate a comprehensive evaluation of the true cost of implementing the Program at a level that will achieve the region's goals. The subbasin plans can provide the foundation for developing the true cost estimate to meet the requirements of the Act. The fish and wildlife managers are prepared to engage the Council in this discussion. It is now clear to us that the funding level established by BPA is insufficient to fully implement the subbasin plans adopted into the Program. It is also apparent that there will be additional needs, on top of the current funding, to fully meet BPA's obligations under the biological opinion remand process. The CBFWA members also support an innovative funding category, but agree that in the current funding scenario, additional funds should be provided to support it.

According to the original solicitation documents, the Council identified several local and regional entities and groups to review fish and wildlife projects submitted to the Council for funding and to develop balanced budgets to meet the highest priority management objectives according to predetermined province level funding allocations. Subsequently, the province level groups reviewed the projects and balanced the Council's Program for FY 2007-2009 consistent with subbasin plans and the Council's guidance documents on research, monitoring and evaluation. The CBFWA members believe that the Council has significantly deviated from the province level recommendations, particularly in the Basinwide category, and may have deviated significantly from their own Program. In addition, the Council has not identified how the current project recommendations meet the 70:15:15 allocations between anadromous fish, resident fish, and wildlife projects. This was a major funding principle for the 2007-2009 solicitation. The Council should provide this analysis with their final recommendations.

The CBFWA Members were generally satisfied with the prioritization work that was completed at the province level. The primary conflicts arose due to the competition for inadequate funds resulting in the discontinuation of ongoing core work to fund new projects. Several projects that are essential and of high priority to the management of fish populations negatively affected by the federal hydro-power system were either significantly compromised by reductions in funding or were eliminated. Table 1 provides a list of projects that exemplify essential projects or tasks that will be lost according to the current Council draft recommendation. The result is a significant weakening of our ability to manage, conserve and enhance these resources. The CBFWA members encourage the Council to fully consider the recommendations of the province level review groups and to seek additional funding from BPA to fully implement the Program.

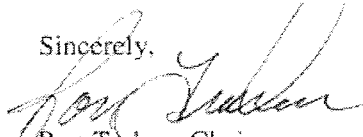
The CBFWA members are concerned that the Council has created several placeholders in their draft recommendation. Essential projects (as identified in Table 1) must not be foregone in order to fund yet-to-be determined proposals to be solicited in an undefined process. Until the Council has completed an overall cost review of the Program, the CBFWA members do not support withholding money from existing essential projects to support undefined alternatives. In the final project recommendations from Council, the CBFWA members would appreciate an explicit statement of purpose and process designated for any placeholders that are held in reserve.

Mark Walker, NPCC  
October 6, 2006  
Page 3 of 3

CBFWA recommends fully allocating the available expense budget, working with BPA to estimate and make available unspent dollars from FY 2006 and earlier years, and working with BPA to aggressively identify opportunities to capitalize costs currently defined as expenses. Toward this end, the Council should immediately schedule a meeting with the fish and wildlife managers to go through the draft list of recommended projects and work together to correct critical omissions and errors in funding levels. The biological consequences of not fully funding the subbasin plans are avoidable if the Council commits to working more closely with the fish and wildlife managers to define critical needs and priorities and better use available dollars to fund projects that meet those needs.

If you have questions regarding these comments, please contact Brian Lipscomb at (503) 229-0191.

Sincerely,



Ron Trahan, Chair  
Columbia Basin Fish and Wildlife Authority

Enclosure

cc: CBFWA Members  
NPCC Members  
Greg Delwiche, BPA  
Glen Nenema, KT  
Deane Osterman, KT  
Rick Sherwood, STI  
B.J. Kieffer, STI

Table 1:

Examples of essential projects or tasks currently not recommended by Council for funding in FY 2007-2009.

Proposal Number	Title	Sponsor	Budget Category	Prioritization Category	Province Recom. FY 2007	Province Recom. FY 2008	Province Recom. FY 2009	Draft Council FY 2007	Draft Council FY 2008	Draft Council FY 2009	Council Comment	CBFWA Comments	FY2007 Difference
198605000	White Sturgeon Mitigation and Restoration in the Columbia and Snake Rivers Upstream from Bonneville Dam	Oregon Department of Fish & Wildlife (ODFW)	Multi-province	Core Program	\$1,431,916	\$1,431,916	\$1,431,916	\$1,150,000	\$1,150,000	\$1,150,000	Reduce the work elements to priority elements. Need to confirm what work can be accomplished at this budget level.	The White Sturgeon Mitigation and Restoration Project provides information needed to maintain commercial and sport fisheries and population viability of white sturgeon populations negatively impacted by impoundments created by the construction of the Columbia River hydropower system. This project has been deemed vital to continued management of white sturgeon in these impoundments by the Columbia Basin Fish and Wildlife Authority, Northwest Power and Conservation Council, NOAA Fisheries (at the time, National Marine Fisheries Service), multiple sub-basin plans, as well as the states of Oregon and Washington and the Columbia River Inter-Tribal Fish Commission. Results of this project from 1986-1992 indicated markedly reduced productivity in the Zone 6 reservoirs, and highlighted the need for intensive, reservoir-specific management. These studies also indicated a need for continued monitoring over long periods of time, due to the protracted life cycle of the species. During the 2003-2005 proposal process, tribal and state representatives reinforced this issue by supporting the project's recommendations to change the periodicity of surveys in the Zone 6 reservoirs. Without the information provided by this project, the co-managing agencies would have been unable to make informed decisions. This project has been highly successful in managing these populations to allow susta	
198810804	StreamNet (CIS/NED)	Pacific States Marine Fisheries Commission (PSMFC)	Basinwide	Core Program	\$2,500,000	\$2,500,000	\$2,500,000	\$2,315,033	\$2,315,033	\$2,315,033	Interim funding pending Council review of data priorities. <b>Council draft recommendation is to hold to FY 2006 level.</b> ISRP fundable (qualified): address in programmatic issue in the decision document.	A recent workshop to identify priorities for the StreamNet project indicated that additional funding may be necessary to support comprehensive data coverage and improved timeliness in data reporting. The Council recommendation to reduce the MSRT recommended budget will not support a renewed reliance on StreamNet. Inclusion of tribal data and improved timeliness will require additional funding. Reduced funding for existing data management projects force them to choose between updating existing databases or addressing additional regional needs expressed in the Council's Data Center concept paper. Either way the data sharing gap will widen. We recommend the Council restore funds cut from these projects and provide additional funds from the placeholder amount to improve data sharing functionality as described in the Data Center concept paper. The regional Data Workshop held on September 20 and 21 identified the lack of tribal data sharing capacity as a critical data gap. Cuts to existing tribal programs at the provincial level have reduced the existing minimal tribal data management capacity, thus widening this critical gap. We recommend the Council use placeholder	-\$281,916
198811525	YKFP - Design & Construction (Nelson Springs replacement facility)	Yakama Nation	Columbia Plateau	Core Program	\$628,701	\$0	\$0	\$0	\$0	\$0	ISRP - Fundable (Qualified)		-\$184,967
													-\$628,701

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198812025	YKFP Management, Data, Habitat	Yakama Nation	Columbia Plateau	Core Program	\$1,237,239	\$1,268,041	\$2,284,582	\$266,666	\$266,666	\$2,66,666	ISRP fundable qualified: ISRP recommends that the broader YKFP program be the subject of an organized program review. Project sponsor should consider focusing the next annual review for this purpose, otherwise review will need to occur as part of the ne	The reduction in funding of approximately \$1M per year would result in the loss of 10-20 FTEs. It is unclear at this time exactly which positions and tasks would be eliminated to meet the reduced budget. However, the project's ability to meet management, administrative, data management, habitat, biological, and/or programmatic objectives identified in the proposal and/or the subbasin plan would very likely be compromised. Key habitat acquisition or enhancement planned for FY2009 would not be implemented.	-
198906201	Annual Work Plan CBFWA	Columbia Basin Fish & Wildlife Authority (CBFWA)	Basinwide	Core Program	\$2,071,450	\$2,071,450	\$2,071,450	\$1,885,250	\$1,885,250	\$1,885,250	Interim funding pending further Council review of the appropriate coordination activities. Council draft recommendation is an interim budget level that represented the MSRT recommendation, minus the Kalispel and Spokane requests. Council requests a recommendation from staff in October 06 re tasks, deliverables.	The current Council draft recommendation fully funds the Kalispel and Spokane tribes coordination projects at \$90k. The CBFWA budget has a corresponding reduction of \$180k per year. The Council has not determined what part of the CBFWA budget should be reduced by \$180k or what tasks are no longer priorities. This recommendation is inconsistent with the MSRT's efforts at transparency and equity among the participating fish and wildlife managers participation in regional activities. The Spokane and Kalispel tribes are not proposing to perform similar work as funded through the CBFWA project, and therefore their funding should not require a decrease in funding for CBFWA. See separate CBFWA comments.	-\$970,573
199101901	Hungry Horse Mitigation/Flathead Lake	Confederated Salish & Kootenai Tribes	Mountain Columbia	Urgent or High Priority (Provin. Group did not assign U,H, or RA but this project was amongst 5 others that received the highest possible score)	\$174,000	\$408,000	\$412,000	\$139,000	\$338,000	\$412,000	Funding contingent on ISRP, Council review of revised proposal. Revised proposal due end of December, 06.	The Council recommended a reduced budget for FY07 & 08 for ongoing project 199101901. The amount they recommended for FY07 is actually less than that funded for each year in FY02-06. Like many other projects in the basin, the budget for project 199101901 was "capped" since 2002 which has not permitted the Tribes to adjust for inflation and has restricted our ability to implement on-the-ground habitat projects and leverage cost-share opportunities. The Council's recommended budget of \$139,000 will further restrict the accomplishments this project can report. The Council reduced the budget request for project 199101901 by \$70,000 in FY08. As described in the project proposal, the budget increases submitted for project 199101901 in FY08 and FY09 are associated with the need to conduct restoration activities and maintenance activities on properties acquired under Secure and Restore Critical Fisheries Habitat (200200300). If project 199101901 is not made whole, restoration and maintenance activities are at risk on parcels acquired under project 20020300. State and tribal mitigation efforts will suffer if project 199101901 i	-\$186,200
													-\$35,000

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Examples of essential projects or tasks currently not recommended by Council for funding in FY 2007-2009.

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199206200	Yakama Nation Riparian/Wetlands Restoration	Yakama Nation Wildlife Resource Management	Columbia Plateau	High Priority	\$ 1,575,163	\$ 1,623,313	\$ 1,673,842	\$0	\$0	\$0	ISRP Comments: Fundable. This is an important project working toward habitat conservation goals in some critical areas of the Yakima Basin. Missing from the proposal was evidence of a strong biological monitoring component. The proposal stated that th	This comprehensive project protects and restores floodplain habitats along anaromous fish-bearing streams in the agricultural portion of the Yakama Reservation. The Yakima Subbasin Assessment identified the loss of floodplain function in these watersheds as a critical factor limiting the production and survival of salmonid and wildlife populations. The protection and restoration of the floodplain habitats in these watersheds has been identified as high priority in the Fish and Wildlife Management Plan portions of the Yakima Subbasin Plan. Overall objectives include the protection, restoration and management of 27,000 acres of floodplain lands along the Yakima River, Satus and Toppenish Creeks. Methods used include securing large contiguous lands, along with their associated water rights. Restoration of these lands emphasizes the return of normative hydrologic processes and ecological functions. Management and monitoring activities ensure that the restored conditions persist into the future. This project only funds the land securing, restoration planning, and management/monitoring aspects of this comprehensive project. This is one of the most cost-effective floodplain habitat projects in the northwest. At This project and the Yakama Reservation Watersheds Project (199603501) complim	
													-\$1,575,163
199305600	Research to advance hatchery reform, including captive broodstocks	Northwest Fisheries Science Center	Multi-province	Core Program	\$ 1,468,100	\$ 1,468,100	\$ 1,468,100	\$1,000,000	\$1,000,000	\$1,000,000	Reduce the work elements to priority elements. Need to confirm what work can be accomplished at this budget level.		
													-\$468,100
199402600	Pacific Lamprey Research and Restoration	CTUIR	Columbia Plateau		528000			0				The CBFWA members are concerned by the Council's disregard for lamprey projects within the Columbia River Basin. This project has been a leading Columbia Basin lamprey project. This will remove funding for tribal involvement in lamprey research and restoration efforts. This project was the first lamprey project in the Program and was responsible for delivering the first status report and collaboration among lamprey project sponsors, which evolved into the multi-agency Lamprey Technical Workgroup. Lamprey are heavily impacted by the Columbia hydro system. This project received a favorable ISRP science review. Several subbasin plan objectives would not be met by not funding this work.	
													-\$528,000
199405400	Migratory Patterns, Structure, Abundance and Status of Bull Trout Populations in Subbasins of the Columbia Gorge, Columbia Plateau and Blue Mountain Provinces	Oregon Department of Fish & Wildlife (ODFW)	Basinwide	Core Program	\$367,500	\$367,500	\$367,500	\$0	\$0	\$0	ISRP questioned the linkage between research and management actions.		
													-\$367,500



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199601100	Walla Walla Juvenile and Adult Passage Improvements	CTUIR	Columbia Plateau		775000			387000				Two major irrigation diversion screens in the mainstem Walla Walla River (Old Lowden and Bergevin-Williams) need to be upgraded/replaced in order to stop the loss of salmon and steelhead smolts that currently occurs at these sites. Passage concerns at these two diversions would not be fully addressed at the reduced project budget level proposed by the Council. In the May 2004 version of the Walla Walla Subbasin Plan, the Old Lowden and Bergevin-Williams ditches are the listed imminent threats under section 7.3.1 "Management Plan – Aquatic Strategies - Imminent Threats and Passage Barriers" (pages 147-151). These two diversions are also referenced in the Final Addendum of the Walla Walla Subbasin Plan (Nov 2004). These are the last two major passage threats located in the mid mainstem Walla Walla River and are described as "sites of significant water withdrawals along the reach without having screening or screening believed to be effective".	-\$388,000
199602000	Pit Tagging Spring/Summer Chin	Columbia River Fisheries Program Office	Basinwide	Core Program	\$1,365,000	\$1,365,000	\$1,365,000	\$765,000	\$765,000	\$765,000	Interim funding pending further Council consideration of regional monitoring and evaluation framework. ISRP fundable (qualified): address ISRP concerns during further consideration.	At the reduced funding level (from the MSRT recommendation), the CSS project sponsors will focus on maintaining the wild salmonid marking program in the Snake, John Day and Warm Springs rivers. At this funding level, we can complete the 10-year summary report requested by the ISRP and the ISAB. However, project sponsors would not be able to maintain the time series of marking for the Snake and down-river Chinook salmon hatchery programs, or implement the Snake River hatchery steelhead program (as recommended by the ISRP). The loss of these hatchery groups would have a major impact on a variety of management issues concerning listed and non-listed stocks of Pacific salmon and steelhead.	-\$600,000
199602100	Gas Bubble Disease Research & Monitoring of Juvenile Salmonids	Columbia River Research Laboratory	Basinwide	High Priority	\$23,946	\$25,081	\$26,906	\$17,311	\$17,311	\$17,311	Need to revisit prior to expiration of state water quality waivers (review during fall 07).		-\$6,635
199603501	Yakama Reservation Watersheds Project	Yakama Nation	Columbia Plateau	High Priority	\$1,074,742	\$1,140,151	\$1,211,446	\$0	\$0	\$0	The Council in their draft 2007-09 recommendations made no comments. However, the ISRP in their FY 2007-09 Final Review of Proposals said the following: "This ongoing project is very well described in the proposal. The sponsors are to be commended for t	The YRWP takes a comprehensive approach to restoration and monitoring for fisheries resources including ESA listed steelhead and bull trout in four important tributaries of the Yakima River. The Satus, Toppenish and Ahtanum watersheds together represent an average of 50% of the total steelhead spawning in the entire Yakima Subbasin, and harbor two of the four distinct steelhead populations in the subbasin. YRWP provides nearly all the population and habitat quality data for steelhead in these three watersheds and allocates a substantial portion of its budget and effort to increasing steelhead production through watershed restoration activities, in addition to monitoring populations, habitat and restoration efforts. The project was listed as High Priority by the local project review panel. This project is consistent with and addresses Tier 1 habitat limiting factors as described in the Yakima Subbasin Plan Supplement, table 2, pg.11-13. It is difficult to understand how implementation of the Yakima Subbasin Plan and recovery of Yakima subbasin steelhead can be achieved without this project.	-\$1,074,742

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199604000	Mid-Columbia Coho Restoration	Yakama Nation	Columbia Cascade	Ranked 5th in overall Province evaluation out of 47 projects submitted for 07-09	\$3,500,945	\$2,962,228	\$2,884,222	\$0	\$0	\$0	ISRP - Fundable in Part. The ISRP recommends funding this project at a base level in order to proceed with the Three-Step process and development of the Step 1 documents and analysis. NPPCC - Funding only ESA projects in "expense category" in Province plu	Since project implementation in 1996, the total investment in Mid-Columbia coho reintroduction has been \$13.8M. The Wenatchee and Methow subbasin plans both identify coho as a focal species. In the Wenatchee plan, Goal 3 is to "[r]estore, maintain, or enhance fish and wildlife populations to sustainable and harvestable levels, while protecting biological integrity and the genetic diversity of the species." The Plan's Guiding Principle 10 states "Restoration of individual populations may not be possible without restoration of other fish and wildlife populations with which they co-evolved." In the Methow plan, "[t]he goal for coho salmon includes re-establishment of run sizes that provide for species recovery, mitigation of hydro-system losses, and harvestable surpluses. As the recovery program continues, reintroduction of coho to tributaries within the Methow Basin will aid in species dispersal." This project has met every goal and scientific test to date that has been asked of it from Policy makers to independent and agency scientists. It has significantly increased salmon numbers to the Columbia Cascade Province and is be	-
													-3,500,945
199604601	Walla Walla Fish Habitat Enhancement	CTUIR	Columbia Plateau		321000			0				This project is a priority base habitat enhancement effort in the Walla Walla subbasin and targets stream improvements that are consistent with subbasin plan priorities. The project has been ongoing for about ten years and has numerous completed stream projects which require maintenance commitments to maximize fisheries benefits from initial investments. The South Fork of the Walla Walla River is identified as "priority" for restoration and protection in the Walla Walla Subbasin Plan (page 59). Out of 26 priority areas in the basin, the South Fork of the Walla Walla River ranked number 3 in "restoration" potential for spring Chinook and number 7 for summer steelhead (Tables 3-2 and 3-4). The EDT predictions for "protection benefit" ranked the South Fork of the Walla Walla (mouth to Elbow Creek which includes the proposed project areas) as number 1 for spring Chinook and summer steelhead. Proposed work includes riparian and upland restoration and instream aquatic habitat enhancement.	-
													-321,000