

**IDAHO DEPARTMENT OF FISH AND GAME**

600 S. Walnut/P.O. Box 25
Boise, Idaho 83707

James E. Risch/Governor
Steven M. Huffaker/Director

October 6, 2006

Mr. Mark Walker
Director of Public Affairs
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204

Dear Mr. Walker:

The Northwest Power and Conservation Council (Council) has requested public comment on several issues, including the Council's draft project funding recommendations for FY07-09 and memos summarizing issue resolution for projects. Per the Council's request, Idaho Department of Fish and Game (Department) provides the following comment specific to basinwide research, monitoring and evaluation, and coordination projects for which the Department is a key fishery manager of the affected resource and a key agency implementing the project. We appreciate the opportunity to provide a fishery manager perspective on the funding proposal for these important projects.

Please feel free to contact me if you have any questions about our comment. We look forward to continued productive development of the FY07-09 Council Fish and Wildlife Program.

Sincerely,

A handwritten signature in cursive script that reads "Sharon W. Klefer".

Sharon W. Klefer
Anadromous Fish Manager

Cc: J. Danielson, Idaho NPCC

Keeping Idaho's Wildlife Heritage

Comparative Survival Study (CSS) Project (199602000)

Reduction in Funding

The Department notes that the Council has recommended project funding that is substantially lower than the Manager System Review Team (MSRT) recommendation. The Council has articulated that this is an interim funding level pending further Council consideration of regional research, monitoring and evaluation (RME) issues. The quandary of the appropriate scope for regional RME one the Council and the Columbia Basin region has been struggling with for some time. One budgeting approach would a reduction in funding while the Council and the Columbia Basin collectively continues to struggle with this issue. This is the current course of the Council for CSS. We suggest an alternative approach would be to implement the MSRT recommendation with adaptive feedback should there be agreement on a regional RME framework during the 07-09 period, which might change the scope of the project (increase or decrease). However, given Council uncertainty about this project, we can appreciate reluctance to expand the project now by including steelhead and other hatchery stocks, which is the basis of much of the increase in the proposed budget. We are confident that at least maintaining the current core suite of activities is warranted and will be supported by further science review. Maintaining project funding at least at the FY06 level funding is likely necessary to continue key tasks and we strongly recommend consideration of at least FY06 level funding as the interim funding proposal.

The CSS project was recommended for funding by ISRP, and the MSRT ranked the project as a core project for the Fish and Wildlife Program (including expanded PIT tagging of hatchery steelhead). If there are more specific criteria for the funding modification than the regional RME concern, it would be beneficial for the Council to identify it to help interested parties and the fishery managers understand effects to core functions of the Fish and Wildlife Program.

The Council funding recommendation seems somewhat counter to the ISAB and ISRP reviews of the scientific merits of the CSS 2005 annual reports and FY 2007-2009 project proposal. The ISAB detailed review in March 2006 concluded that: *"The Council should view the CSS as a good, long-term monitoring program the results of which will become increasingly valuable to managers as years pass. Scrutiny from periodic peer reviews and agency comments will help ensure that the methods and analytical approaches improve. The project is definitely worthy of Council support."* The ISRP agreed with the ISAB conclusions for the CSS project and recommended, consistent with the ISAB, that the CSS project produce a ten year summary report. The project sponsors, including the Department, agreed with the recommendation and welcomed ISAB/ISRP feedback on the ten year summary report to be completed in 2007.

We note that in many cases, the Council deferred to the FY06 funding allocation where there was a reduction from the MSRT recommendation. In addition, our understanding is that the general intent of the Council was to fund projects at level funding until the Council resolves issues concerning the M and E framework. However, our understanding is that the current proposed funding level for CSS is below level funding. As an implementing agency, this concerns us because of potential impact to current key tasks and because it may also impair the

value-added functions to the Department served by the current CSS tagging levels and those we would have gained from the proposed expansion in steelhead PIT tagging.

Reduction of core functions

The Department as an implementer of CSS is committed to produce a 10-year project report in FY 2007 as recommended by the ISAB and ISRP reviews. Producing the 10-year report would remain a priority with the Department even with a reduced budget, potentially reducing the budget amount available for PIT tags and the tagging.

The Department has augmented its technical expertise devoted to CSS with technical and analytical support from the Fish Passage Center. At this time, the provider, scope and access to these technical functions are unclear. The Department merely points out that acquiring the same level of technical service for the CSS project to uphold ISAB and ISRP expectations may or may not require reallocation of reduced project funds if the existing service is no longer available at no direct charge to the project. The Council recommendation would likely reduce the numbers of Snake River hatchery spring/summer Chinook available for analysis of key mainstem management actions, including transportation, spill and removable spillway weir installation. Many regional entities, including NMFS, rely on the CSS hatchery Chinook PIT tagging to evaluate mainstem management actions implemented under the Biological Opinion and the NPCC Fish and Wildlife Program.

It is not yet clear how much reduction would have to occur in hatchery Chinook tagging however, the numbers would likely be less than reviewed and approved by the ISRP based on the proposed budget reduction. Consequences would be reduced precision in estimating key metrics such as Transport/In-river smolt to adult return (SAR) ratios and D (differential delayed mortality of transported smolts), and a reduced ability to address questions related to current (and future) FCRPS Biological Opinion implementation. Maintaining a standard approach to transition from previous mainstem actions into new actions would seem important for consistency in conclusions about management effectiveness.

The reduced funding recommendation would terminate expansion of PIT tagging to any additional hatchery Chinook populations in FY 2007-2009. Any expansion of PIT tagging to additional wild downriver populations would further reduce the funding availability for existing hatchery Chinook tagging. Particularly important to the Department, CSS PIT tagging of hatchery steelhead as proposed for FY 2007-2009 would not occur. In 1998, the ISAB recommended the expansion of CSS PIT tagging to other salmon species (including steelhead). This tagging has been proposed by CSS and approved through ISRP and CBFWA review processes for several years but never funded by BPA. The FY 2007-2009 CSS proposal included a value-added commitment by the Lower Snake Compensation Program (LSRCP) to collaboratively fund PIT tagging at LSRCP hatcheries to get representative smolt-to-adult survival information for all Snake River hatchery steelhead. LSRCP could conceivably fund their planned tagging, but this seems unlikely without funding for the CSS marking proposal for a comprehensive Snake Basin approach.

Reduction of value-added functions

While the CSS project objectives primarily address effectiveness of mainstem management actions, IDFG also relies on adult returns from the hatchery Chinook PIT tags in-season to assess runsize and carry out spring/summer hatchery Chinook fisheries in the Clearwater River, in the lower Salmon River (targeting Rapid River Hatchery fish) and in the South Fork Salmon River (targeting McCall Hatchery fish). The SAR data is proven important in tracking overall performance of these programs and the large tagging groups have allowed us to gain important insight about stock timing in the Columbia and Snake Rivers, as well as passage survival from Bonneville to Lower Granite Dam. All three of the CSS Chinook hatcheries in Idaho (Dworshak NFH, Rapid River FH, McCall FH) were built for fishery mitigation. Because of the large number of CSS PIT-tagged fish, the Department now has an invaluable inseason tool to provide more accurate estimates of how many of these fish are returning from Bonneville upstream to Lower Granite Dam. This data plays a role from opening to closing Idaho fisheries. Better inseason return estimates and inriver timing information have resulted in improved management of both nontreaty and treaty Chinook fisheries in Idaho. Better information about the target harvest stocks also means improved management of incidental interceptions of non-target stocks, such as naturally-produced Chinook. Improved stock specific harvest management is a goal of the Department and we believe it is one the Council supports. The base scope of the CSS project has allowed other funding sources to augment PIT tagging to increase stock coverage for fishery management. In 2006, LSRCP released additional PIT tagged hatchery Chinook from Clearwater Hatchery programs to augment the CSS tags from Dworshak to improve our existing ability to forecast and manage harvest in the Clearwater salmon sport fishery. These fisheries are very important to the public being mitigated and they have economic value as well. We find the CSS project one where mainstem data needs and Idaho fishery data needs can both be met and provide substantial benefit.

As noted above, the FY 2007-2009 CSS proposal included a value-added commitment by LSRCP to collaboratively fund PIT tagging at LSRCP hatcheries to get representative SAR information for all Snake River hatchery steelhead and potentially allow an expanded estimate of PIT tagged adults to determine what proportion of the hatchery steelhead run to the Snake Basin is attributed to LSRCP. This coordinated approach would have allowed an improved evaluation of the LSRCP hatchery steelhead mitigation program, with the efficiencies of a cost-shared approach. LSRCP could still conceivably fund their portion of the tagging for SAR, but this seems unlikely without full funding for FY 2007-2009 CSS hatchery steelhead marking proposal to achieve the overall contribution estimate.

The Collaborative Systemwide Monitoring and Evaluation Project (CSMEP; 200303600) has been developing pilot M&E designs for Snake River and Columbia River salmon and steelhead. CSMEP has relied heavily on existing CSS PIT tag information for key components of the pilot designs to improve the integration of M&E. The integration exercise involves looking for efficiencies in M&E across the life stages of salmon and steelhead, and across management questions for population status and trends and in the 4 "H's". While CSMEP M&E conceptual design work could continue, major cutbacks in PIT tagging of key salmon and steelhead production components (i.e., core functions) would ultimately hamper development of efficient,

integrated M&E designs for the FCRPS Biological Opinion and the NPCC Fish and Wildlife Program.

Collaborative Systemwide Monitoring and Evaluation Project (CSMEP) 200303600

The CSMEP project was recommended for FY 2007-2009 funding by ISRP, and the MSRT ranked the project as a core project for the Fish and Wildlife Program. The MSRT ranked the CSMEP proposal as a core project for the Fish and Wildlife Program and recommended reducing the budget slightly (by about 3%) from the requested amount. The NPCC recommendation slightly reduced the budget for FY 2007 and 2008 (by another 1%), but inexplicably recommends no funding for 2009 and articulated a similar rationale for the funding reduction as noted for the CSS project.

The NPCC recommendation to not recommend funding for CSMEP in 2009 is counter to the ISRP reviews of the scientific merits of the FY 2007-2009 project proposal. The ISRP concluded "*The continuation of the ongoing project should be useful in establishing better monitoring and evaluation programs systemwide*". The FY2007-2009 project proposal assumed a termination date of 2014; the ISRP comments do not suggest anything other than a long-term effort is needed. While the 2014 date is debatable, it is very clear that achieving objectives of the project and the expectations of the ISRP will not be attained in just two more years. As suggested for the CSS project where the Council has similar concerns about the overall scope of regional RME, we believe a more productive path would be to implement the MSRT or Council funding level for the 07-09 period with adaptive feedback should there be agreement on a regional RME framework during the this period, which might change the scope of the project.

IDFG is one of the key implementing agencies of CSMEP. As a management agency we believe we stand to gain improved monitoring and evaluation programs not only in the systemwide context, but also in the statewide context. Because of the expected contribution of CSMEP to our fishery management regime, the Department strongly believes that the CSMEP project should be funded for FY2009. The need for collaborative systemwide M&E will not go away after two years, particularly with implementation of a new Biological Opinion and completion of Recovery Plans. In fact, we believe CSMEP should play an important role in the Council and Columbia Basin effort to define the scope of a regional RME program.

IDFG does not object to minor budget cuts for FY 2007-2008, but notes that our agency has devoted one full time staff biologist position to CSMEP and contributes significant time from two other staff where technical data development complement CSMEP tasks. We consider this an efficient way to implement the project. However, the NPCC recommended funding levels for 2007-2008 may be insufficient to support the full time employee and providing only two years of funding could hamper our ability to retain technical experts for this project.

General comment about reduction to FY06 level funding for projects

We recognize the Council has received proposals for projects far in excess of the allocated budget and maintaining several ongoing projects at FY06 level funding (rather than proposed, increased budgets) is a budget management decision, particularly for projects where the Council desires additional assessment pursuant to developing a regional RME framework. The Department assumes that there will be opportunity for project sponsors to revise proposals to match the Council's funding recommendation as the process continues. This will be necessary because of inflationary increases; it is likely that FY06 funding cannot accomplish the same suite of tasks in FY07-09 that was accomplished in FY04-06.