

February 26, 2001

Mr. Frank L. Cassidy Jr.

Chairman

Northwest Power Planning Council

851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204-1348

Dear Mr. Cassidy:

The National Marine Fisheries Service (NMFS) participated as a member of the Columbia Basin Fish and Wildlife Authority (CBFWA) in the review of proposals received under Bonneville's and the Council's "High Priority" solicitation. This letter supports and augments the CBFWA's consensus recommendation regarding the importance and urgency of those projects to timely implementation of the FCRPS 2000 Biological Opinion (BiOp).

During the CBFWA review process NMFS identified those project proposals that implement one or more of the action Items (FCRPS Biological Opinion, Appendix F) under the Reasonable and Prudent Alternative (RPA), and that were sufficiently important that they should proceed immediately. Our only change to the "BiOp" designation in the recommendations submitted by CBFWA is the addition of the "BiOp" designation to the *Arrowleaf/Methow Conservation Project* (proposal no. 23012). This change is relevant only to adding the "BiOp" designation and does not otherwise affect or alter the recommendation of CBFWA.

NMFS also considers several of these high priority "BiOp" proposals to have potential value as Tier 3 monitoring and evaluation (M&E) projects. We have ranked these projects relative to this potential (see enclosure). For the purpose of expediency, NMFS scientists have begun to contact the agencies and groups proposing these projects to offer advice, and collaboration if desirable, in modifying the monitoring and evaluation components of their proposals. Modifications for M&E may require additional funding, but this is an important opportunity to capitalize on good projects that are already planned and about to be implemented. The Biological Opinion requires that the action agencies begin Tier 3 monitoring programs and complete implementation within three years (Action 183). This will probably not be possible unless some Tier 3 projects are initiated this year. NMFS anticipates that it will have more formal guidelines for such Tier 3 projects for future years.

Neither the Council nor BPA should construe the lack of the "BiOp" designation in CBFWA's recommendation to mean that the project is inconsistent with the BiOp, or not relevant to implementation of the RPA. Many of the projects were consistent with the BiOp, and could be designated as a BiOp implementation project in the future through one of the Council's provincial review or sub-basin planning processes. It only means that, at this time, a project was not viewed as being of sufficiently high priority to warrant immediate implementation. Alternatively, some proposed projects, such as the *Removal of Lost Ghost Nets* (proposal number 23013), seem to be important enough that they should be considered for immediate implementation even though not specifically identified in the BiOp.

Bonneville's and the Council's High Priority solicitation was grounded in criteria that sought activities that could be implemented immediately and result in immediate survival improvements to one or more life stages of salmon or steelhead. These criteria generally excluded research, planning, and other activities that, while important, could not demonstrate immediate survival benefits. We believe that consideration should be given (outside of the High Priority category) for certain research opportunities that we deem to be of high importance for BiOp implementation in 2001. Two such proposals were submitted in response to the High Priority solicitation that we believe are of such importance and urgency that we designated them as BiOp projects even though they were given a "Hi Priority - B" rating. These were, *Support for the Development and Certification (FDA approval) of Effective Drugs and Anesthesia for Fish* (proposal number 23004), and *Reproductive Success of Naturally Spawning Wild and Hatchery-origin Spring Chinook* (proposal number 23034). We urge the Council to recommend proceeding with these projects immediately.

The RPA called for a number of other actions to be implemented in 2001 by the action agencies that were not addressed by the high priority solicitation. While not all are expected to be funded exclusively by BPA, these are important and urgent and include the development of additional habitat activities, salmon and steelhead marking planning, safety net actions, research and monitoring, and formation of the Interior Columbia Technical Recovery Team. It is possible that BPA's responsibility to address some of these needs can be addressed in the Council's Provincial Review solicitations, depending on the schedule for concluding those processes. However, several actions do not fit within any specific province and need more immediate attention in order to meet timeframes established in the BiOp. These actions are summarized in a companion letter to BPA that we are sending today. We recognize that these needs were not intended to be addressed through the subject high priority solicitation. However, we urge the Council and BPA to view these other actions as part of a package that together with the high priority projects will amount to an adequate FY 2001 RPA action.

We thank you for the opportunity to amend and clarify NMFS' identification of high priority proposals that will help to achieve the objectives of the Biological Opinion. We are certain you share our interest in moving toward recovery of threatened and endangered salmon and steelhead in the Columbia River Basin. On our part, NMFS will expedite, to the extent possible, any ESA reviews, consultations, or permitting work necessary to implement the projects we are recommending for 2001 funding.

Sincerely,

Brian J. Brown
Assistant Regional Administrator
Hydro Division

ENCLOSURE

Research, Monitoring and Evaluation Priorities from the CBFWA Recommendations with a "BiOp" Designation.

High Priority Actions labeled "BiOp" are ranked for inclusion in a network of "Tier 3" monitoring programs. Tier 3 monitoring includes detailed studies of specific management actions (effectiveness monitoring) and studies addressing the reproductive success of hatchery fish (contributing to our understanding of population status).

In prioritizing these projects for Tier 3 monitoring and evaluation, we have considered (in order of importance) 1) the type of activity being planned – is this called for as an early action in the Biological Opinion? 2) whether conditions are anticipated to change as a result of the action; 3) the potential to evaluate the action clearly and 4) the location and species affected. There are several land acquisitions that ranked low as a monitoring and evaluation priority because the habitat to be acquired is already in good condition, and no actions are planned, or the project proponents plan to assess the property and plan future restoration activities. NMFS agrees with the project proponents that assessment and planning are important. We recommend these projects be funded.

Actions that are similar (e.g. riparian restoration) or have similar biological effects (e.g. culvert removal and fish ladder construction both increase available habitat) have been grouped together, since multiple projects within into the same experimental framework can provide additional replication and more robust results.) Again, only actions tagged "BiOp" have been considered here. If additional actions are funded, they should be similarly grouped.

High Priority Projects (numbers show relative ranks)

1. **23052** – Acquire and enhance Big and Little Creeks. This is the only project to deal with tidal floodplains and associated habitats. Extensive restoration activities are planned. Implementing an experimental (Tier 3) study would be invaluable to document habitat changes and fish population responses.
2. **23001** -- Bear Valley grazing removal and **23015** -- Salmon River Breaks grazing removal. These two areas, and the Elk Creek grazing removal area that occurred last year should be paired with areas without grazing removal and used as replicates in a Tier 3 study. Although there is monitoring associated with these proposals, there are no control areas against which to judge the effects of grazing removal. Because there are a number of other potential experimental studies in this area (e.g. addressing nutrient limitation), this study will have to be designed carefully to achieve clean results.
3. **23007** – Conservation easement on Baker Ranch, and **23046** – Increase instream flows to de-watered streams in the Walla Walla Basin. These projects both restore in-stream flows directly. This is a high-priority action that must be linked to a Tier 3 monitoring project. (If project 23007 has other riparian restoration activities associated with it, monitoring should be coordinated with 23053 below, and associated projects)

4. **23053** – Wagner Ranch Acquisition, and **23054** – Forrest Ranch Acquisition, **23073** – Holliday Ranch and Crown Ranch conservation easements. All three acquisition proposals plan substantial riparian restoration. These projects could provide excellent opportunities to evaluate different restoration methods and activities.
5. **23048** – Fish screens in Walla Walla Basin, **23056** – Fish screens along the Hood River, and **23062** – Fish screens along the mainstem Snake River. Fish screens are considered a high-priority action. NMFS considers a Tier 3 study that quantifies the benefit of such screens (e.g., number of smolts diverted out of irrigation ditches) extremely important.
6. **23024** -- Hancock springs passage and habitat restoration, **23033** – Big Creek passage and screening, and **23045** – Gourlay Creek fish passage and habitat. All three projects involve removal of a barrier to passage plus upstream improvements (habitat restoration in two cases and the screening of irrigation ditches in the second.) All projects could provide useful information about the benefits of access to additional habitat (e.g., whether survival rates improve as a result of this access), and about colonization patterns. **23040** (below) could also contribute to this effort.
7. **23040** – Chum-reintroduction. This project has several components, including habitat restoration and chum salmon artificial propagation and reintroduction. Carefully structured, Tier 3 monitoring of this project would provide insight into natural use of restored side channels and the ability of artificial propagation programs to contribute to restoring extirpated runs of salmonids.
8. **23034** – Reproductive success of hatchery and wild fish. This topic is extremely important, and must be addressed thoroughly in the very near future. This project is a good beginning to an appropriate evaluation, but does not encompass the entire life cycle. Dependent on favorable scientific review of this proposal, this project could be a higher NMFS priority for monitoring and evaluation.
9. **23091** – East Fork Salmon River habitat. The fact that this project is linked so closely with hatchery operations may make it difficult to evaluate the impact of habitat improvements alone. Depending on the details of the supplementation program, which were not provided with this proposal, it could be very suitable for a habitat improvement evaluation in conjunction with hatchery introductions, similar to 23040. NMFS has ranked this proposal a bit lower than 23040 for monitoring and evaluation, however, because there are several proposals addressing the same species in the same areas.

Lower Priority

As described in our cover letter, several of these proposals have associated monitoring to determine the status of these properties before actions are implemented. This monitoring does not fall in the Tier 3 category but is extremely worthwhile and NMFS recommends that it be fully funded.

23094 – Acquire Zumwalt prairie land. Actions not planned until assessment of property is complete – no actions to monitor at this time.

23039 – Upper Yakima River acquisition. Potential for restoration activities in the future, but none detailed in this proposal. No actions to monitor at this time.

23055 – Acquire habitat on Entiat River. No actions planned (just acquisition). This area appears to be high quality now, with little improvement possible. Note, however, that if this acquisition includes water rights and restoration of in-stream flows, it should become a high priority project for Tier 3 evaluation.

23012 – Acquisition of Arrowleaf property. This property is of high quality now, with no actions planned.

Implementation

The monitoring programs associated with many of these projects are not insignificant. However, all of these programs could be substantially improved. In order to design appropriate monitoring and evaluation programs for these high priority projects, as well as ensure that data collection is consistent across projects, Northwest Fisheries Science Center scientists have begun to contact the agencies and groups proposing these projects. Scientists from the NWFSC scientists hope to collaborate with agency and tribal scientists in designing, and potentially implementing and analyzing these experiments. Data collection should be coordinated with the data management programs that are currently in development. In the near future, the NWFSC will develop a more formal program for Tier 3 monitoring that will emphasize guidelines for rigorous and thorough assessment that should be associated with management actions.