



# COLUMBIA BASIN FISH AND WILDLIFE AUTHORITY

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Coordinating and promoting effective protection and restoration of fish, wildlife, and their habitat in the Columbia River Basin.

**The Authority is comprised of the following tribes and government agencies:**

Burns Paiute Tribe  
Coeur d'Alene Tribe  
Confederated Salish and Kootenai Tribes of the Flathead Reservation  
Confederated Tribes of the Colville Reservation  
Confederated Tribes of the Umatilla Indian Reservation  
Confederated Tribes of the Warm Springs Reservation  
Confederated Tribes and Bands of the Yakama Nation  
Idaho Department of Fish and Game  
Kootenai Tribe of Idaho  
Montana 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

October 27, 2006

Ms. Lynn Palensky  
Northwest Power and Conservation Council  
851 SW Sixth Avenue, Suite 1100  
Portland, OR 97204

Dear Ms. Palensky:

This letter is in response to the Northwest Power and Conservation Council's (Council) August 22, 2006 request for comment on an amendment process to develop biological objectives for the Columbia River Basin Fish and Wildlife Program (Program). The Columbia Basin Fish and Wildlife Authority (CBFWA) does not intend to comment on how the Council should proceed with amending the Program, as this is the purview of the Council as defined in the Northwest Power Act (Act). However, the CBFWA does have comments concerning (1) the obligation of the Council regarding consultation with fish and wildlife managers during an amendment process, (2) participation by fish and wildlife managers in an amendment process, and (3) expectations and outcomes of the amendment process being contemplated by the Council to define Program objectives.

The CBFWA members expect the Council to fully recognize the expertise of federal and regional state fish and wildlife agencies and tribes during any amendment process. In developing amendments to the Program, Section 4(h) of the Act guides the Council to first request such recommendations from the region's federal, state, and tribal fish and wildlife agencies.

If an amendment process to develop biological objectives moves forward, the Council can expect full participation by the CBFWA members. As fish and wildlife managers we have a unique relationship with the Council and as such we will have specific recommendations. We will also fully participate in any public review process. The intent of CBFWA members is to work together through CBFWA to develop consensus input. Individual members may also provide input separately.

The CBFWA members support inclusion of biological objectives in the Program. When amending new biological objectives into the Program, the Council should consider associated metrics that would be used to document progress and success, availability of data necessary to support those metrics, feasibility of and timeframes for collecting and assembling the data, level of analysis necessary to calculate metrics, and frequency of reporting. In addition, the CBFWA members strongly support the basinwide provision and scientific principle in the current Program that call for management actions to be taken in an adaptive manner. Without an adaptive management framework, the region will not be well positioned to monitor or respond to changes (intentional or otherwise) in fish and wildlife populations and their environment.

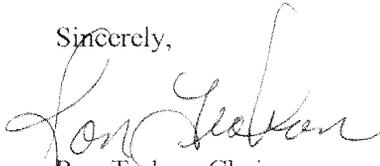
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The CBFWA members are concerned that many existing subbasin plans do not define objectives in a consistent manner or in terms that effectively inform decisions concerning Program planning and implementation. The Council should work with the fish and wildlife managers to revise or refine subbasin-level objectives in a consistent manner for every subbasin. For anadromous fish, the population scale is the appropriate building block to establish subbasin level objectives. For resident fish, sub-population scale objectives may be necessary in some instances. For wildlife objectives, the CBFWA members support continued reliance on the wildlife loss ledger.

It is vital when setting biological objectives for the Program, at any geographic scale, that the Council works with CBFWA members to establish a transparent, long-term reporting method for measuring the Program's success against those objectives. The Status of Resource Project has begun reporting in this vein and it is our understanding that if biological objectives are set through an amendment process, the Status of the Resource Project will adapt in format and content to support reporting against those objectives.

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

cc:  
Greg Delwiche, BPA  
Bill Maslen, BPA  
NPCC Members  
CBFWA Members

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NPCC Reference Document: 2006-15