



## COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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October 31, 2006

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

Dear Ms. Palensky:

This letter is in response to the Northwest Power and Conservation Council's August 22, 2006 request for comment on an amendment process to develop biological objectives for the Columbia River Basin Fish and Wildlife Program. The Columbia River Inter-Tribal Fish Commission offers the following comments and recommendations on the five questions posed in this document.

**Question 1.** Should the Council continue working toward the goal of adopting quantitative biological objectives as described here into the fish and wildlife program through an amendment process under Section 4(h) of the Northwest Power Act?

**Response.** A final decision on *whether* to adopt provincial objectives cannot be made until the region has a clearer understanding about what form those objectives might take and what type of decisions may be made based upon those objectives. Under section 4(h) of the Act, provincial objectives must be based on and consistent with the science of the region's fish and wildlife managers and appropriate Indian tribes. If properly crafted, provincial objectives could be useful to track trends in resource status over time, to compare the relative health of each province, and to prioritize some types of projects and allocate resources.

Fish and wildlife managers, including the tribes, are continuing to develop the data and information upon which quantitative provincial objectives can be based, through recovery planning, U.S. v Oregon, the FCRPS BiOp remand, Pacific Salmon Treaty negotiations and other processes. Any Council-based initiative should follow on these processes and the information developed therein. The Council does not have the scientific or human resources capacity to do this work itself. Moreover, the Northwest Power Act does not envision such a role for the Council. The actual decision on whether to adopt any specific objectives should be made as part of an official amendment process.

**Question 2.** Is the premise correct that the effort to add biological objectives of this type and scale to the program is likely to be successful only if the Council and its regional partners first complete the technical preparation described here?

**Response.** We generally agree with the stated premise. Objectives at any spatial scale are quantitative expressions of conditions that would satisfy a more qualitatively stated goal, vision, or policy. Objectives must be supported by adequate technical information. This core technical information needs to be complete and consistent across subbasins and provinces to ensure internal consistency, comparability and consistent application at all spatial scales.

Quantitative objectives should also be stated in such a way that progress toward meeting them can be measured in some clearly understood manner. Should the Council ultimately adopt provincial objectives, such objectives should include those metrics in a monitoring plan.

**Question 3.** More precisely, would the proposed amendment process to add biological objectives to the program benefit from waiting until the products are available from the NOAA Hatchery Review and the NOAA Technical Recovery Team and recovery planning efforts, even if that means a delay until 2008 in the amendment process?

**Response.** Yes. It is appropriate to delay discussions of Provincial Objectives until the necessary technical information has been assembled, integrated, and synthesized. This work needs to begin soon if the information is to be available to inform discussions in 2008.

Prior to beginning the actual amendment process, the tasks described in the “Premises, and proposed schedule and tasks” section of its August 22 letter should be completed. In addition to the three tasks described, integration of the data and information developed by the NOAA Technical Recovery Teams and the NOAA Hatchery Review process with other data and information developed during subbasin planning and other processes, and other relevant data from the StreamNet project must occur. These integrated data and information sets will provide the best technical basis to inform the amendment process.

The Council should work with the region’s fish and wildlife managers to assemble a work plan and budget for assembling, integrating, and synthesizing the necessary information and identify those entities able to perform the tasks. Budget development should account for all cost sharing opportunities for performing the tasks.

**Question 4.** Is there a different approach and schedule that makes more sense for the Council to pursue to add objectives of this type to the program?

**Response.** Our response to Question 3, above, describe the steps we feel are needed before the question of provincial objectives can be resolved.

**Question 5.** On what basis could the Council pursue objectives if it proceeded without completing the technical work described here?

**Response.** None. Without completing the technical work described above, the Council presently has no basis upon which to develop consistent quantitative provincial objectives. Quantitative objectives must be based upon clearly described technical information that is available to all interested parties. That information should be comparable across provinces. The latest subbasin plans contain much valuable information which can inform selection of provincial objectives but they, by themselves, do not provide the needed level of consistent detail across subbasins, let alone across provinces.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Olney Patt, Jr." The signature is written in a cursive style with a large, looped initial "O" and a distinct "Jr." at the end.

Olney Patt, Jr.  
Executive Director