



November 10, 2006

Lynn Palensky  
Fish and Wildlife Division  
Northwest Power and Conservation Council  
851 SW 6<sup>th</sup> Avenue, Suite 1100  
Portland, OR 97204

RE: 2006-15 Comments on the NWPCC's June 29, 2006 Proposal to Add Province-Level Biological Objectives

Dear Ms. Palensky:

Northwest RiverPartners appreciates the opportunity to provide these comments on setting objectives for the Northwest Power and Conservation Council's (Council) Fish and Wildlife Program. We agree with the concept, and PPC's comments, that the Council's program should be guided by both overarching and specific lifecycle objectives in its fish and wildlife program to help ensure accountability, evaluate results, define responsibilities across the 4 – H's, and clearly communicate whether the program is working or adjustments are needed.

It is clear that such biological objectives are needed however it is far harder to define what they should be and where to start. Furthermore, the region is currently in a crisis situation driven by the Endangered Species Act (ESA). The "Sovereigns" effort to develop a new Biological Opinion for hydrosystem operations, and the development of recovery plans by NOAA Fisheries, will include fishery objectives and goals, define responsibilities across the 4-H's and result in significant new or reallocation of investments in salmon and steelhead mitigation measures.

In this context, one of the most valuable roles the Council could assume is to sort through the various and conflicting goals that many different groups and fish managers in the region are currently holding and advocating. To create the appropriate context for this task, the Council should begin with an evaluation of where this region's fish and wildlife resources currently stand. This assessment should provide an accurate picture of exactly what types of fish, where and how many the region is producing both from hatchery and natural production, and track where investments are being made.

Then the Council needs to establish a clear picture of what “ought to be” including specific goals (abundance, distribution, diversity, etc.) for various stocks of fish, with an emphasis on those that must be recovered. With a clear picture of where the region currently is with respect to fish, and a vision of where we want to go, the Council can better design a program that will get the region there. This effort will then help to identify areas where resources need to be re-allocated or re-prioritized.

For example, a disproportionate share of the region’s current investment goes to measures related to Snake River Fall Chinook. This is due to the spill operations in the Biological Opinion and ordered by the court. Spill during the two months of July and August now represents over \$100 million dollars that can only benefit one listed stock. No one has rationalized how this investment decision relates to the regions’ overall goals and objectives for fish and wildlife.

It also will help answer some of the key questions posed in the Council staff proposal:

- “What is the relationship of the province-level biological objectives envisioned here to Bonneville’s protection and mitigation obligations under the Power Act?
- What is the relationship of this effort to ESA recovery planning?
- What is the relationship of this effort to other activities, such as the development and implementation of a harvest and production management agreement in US v. Oregon?”

To the extent that the modeling and technical preparation that Council staff has identified supports such an overarching assessment, it should proceed. The most critical role the Council and staff can take right now, however, is to provide the region with a more complete view of fish stocks in the region, where the current investment is going, and a vision for where the region needs to head. The Council is uniquely situated to do such an assessment. This evaluation ultimately will help the Council and the region sort through conflicting fishery management goals and objectives, set more specific biological goals and objectives for the Council’s plan, establish regional funding priorities and create more accountability in programs.

Thank you for the opportunity to provide these thoughts and comments. RiverPartners looks forward to continuing to work with you and your staff on efforts to promote science-based salmon mitigation and recovery in the region.

Sincerely,

A handwritten signature in cursive script that reads "Terry Flores".

Terry Flores, Executive Director