



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

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NOV 2 2006

Lynn Palensky
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204-1348

2006011002

Dear Ms. Palensky:

We are responding to the Northwest Power and Conservation Council's (Council) August 22, 2006, request for comment on a process to develop biological objectives for the Columbia River Basin Fish and Wildlife Program (Program). In your request, you have posed several key questions for comment. We have attempted to answer these questions within our response.

The US Fish and Wildlife Service (Service) believes that, although the Fish and Wildlife Program has existed in various forms for about twenty-five years without quantitative biological objectives, the Program will be clarified and strengthened by establishing biological objectives through an amendment to the Program. This is long overdue and we commend the Council for initiating this effort.

The Service recognizes the extensive procedural requirements of a Program amendment. Therefore, we will assist the Council in whatever process they outline, per the requirements in the Northwest Power Act (NWPAct). We are willing to work with the Council to ensure that whatever process they use to establish Program objectives is consistent with the NWPAct and will achieve the overall purpose of the Program. We believe that quantitative biological objectives, when established and implemented, would assist the region in determining the extent to which the Council's basin-wide goal of 5 million adult Pacific salmon and steelhead is being achieved; and which watersheds are successful in meeting their contribution to the basin-wide goal.

We note the NWPAct requires the Council to amend their Fish and Wildlife Program every five years. As such, 2008 is the normal timeframe to amend the Program. Since the Council is required to amend their Program in 2008 regardless of the circumstances, we urge the Council to focus on developing quantitative biological objectives in 2007 and to amend the Program in 2008. This timeline would also be consistent with the next project selection process, which will likely begin in late 2008 or 2009. We believe that one of the Council's highest priorities in the next year or two should be to ensure that quantitative biological objectives are incorporated into the Program to inform the next project selection process.

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We recognize that subbasin planning has laid the groundwork for biological objectives and, since the Council has adopted subbasin plans into the Program, we are confident the Council will ensure this body of work is central to this effort. However, we also recognize that subbasin plans did not use a “common currency” for establishing biological objectives. As you know, subbasin plans were developed independently by each of the four States. Although this resulted in subbasin plans that were tailored to the specific circumstances in each State, it did not result in a standard unit of measure for expressing biological outcomes. We believe that establishing common metrics must be at the core of this process.

To that end, we believe that for anadromous fish (e.g., Pacific lamprey, white sturgeon Pacific salmon), the population scale is the appropriate building block to establish watershed level objectives. We are not confident that province-level objectives have biological significance. For resident fish, sub-population scale objectives may be necessary in some instances. For wildlife objectives, we support the current wildlife loss ledger to account for construction and inundation losses, along with the compensation ratios currently outlined in the Program (2:1). We would also be interested in defining the operational losses for the hydropower system and to set objectives for compensating for ongoing impacts to wildlife.

In addition to developing biological objectives at the appropriate geographic scale, we support the development of a data management and reporting framework that supports a robust program of adaptive management. Establishing biological objectives with a data management and adaptive management framework will be useful both in measuring short-term accomplishments and for understanding long-term trends.

We believe the Council can develop biological objectives based on existing quantitative information, provided an adaptive management framework is incorporated. We do not believe the Council should wait for additional technical information to be completed before proceeding, since there will always be new and better information “just beyond the horizon”. Information from various technical groups (Hatchery Review teams, TRT, etc.) can be incorporated as they become available. Indeed, the purpose of having a robust program for adaptive management is to ensure continuous refinement of the biological objectives through incorporation of new technical information.

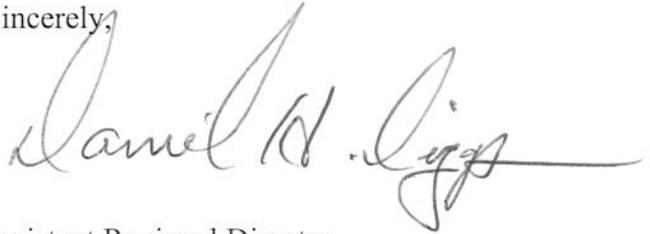
Lastly, we anticipate the Council will recognize, and use, the expertise of the Federal, State, and Tribal fish and wildlife agencies to develop biological objectives. In developing amendments to the Program, Section 4(h) of the NWPA requires the Council to request recommendations from the region’s fish and wildlife agencies. As such, the Council can expect full participation by the US Fish and Wildlife Service as the process to develop biological objectives moves forward; and we will likely have specific

Ms. Lynn Palensky

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recommendations for biological objectives for the Program in the future. Thank you for the opportunity to comment. If you have questions regarding these comments, please contact Mark Bagdovitz at (503) 872-2763.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel H. Lipp". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Assistant Regional Director
Fishery Resources