



Department of Energy

Bonneville Power Administration
P.O. Box 3621
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ENVIRONMENT, FISH AND WILDLIFE

July 11, 2008

In reply refer to: KEW-4

Mark Walker
Director of Public Affairs
Northwest Power & Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

Dear Mr. Walker:

This letter is Bonneville Power Administration's (BPA) response to the Northwest Power and Conservation Council's (Council) draft set of high-level indicators (HLI) designed to measure success of the Fish and Wildlife Program (Program). We appreciate having the opportunity to provide these comments. The development of HLI will be a valuable advancement in reporting progress made by the region and the Program, and should help provide additional focus to monitoring needs and priorities.

Most of the biological indicators identified in the draft appear to be at a regional level of performance reporting, and reflect the combined effect of the Program and other regional actions, as well as ocean and/or freshwater environmental variation and habitat health. As such, the monitoring and infrastructure support costs for HLI reporting for regional and non-hydrosystem performance indicators are not the sole responsibility of BPA. Given their regional perspective and dependence, it will be critical to coordinate with agencies and programs outside of the Program on the development and finalization of the HLI. Additionally, the region's ability to report on HLI is dependent on agreements and understanding of how the region as a whole will monitor and fund the information they will be based upon.

The costs of monitoring that may be implied by the HLI must be fully considered before they are finalized. It will be critical, to first approach HLI development and adoption at a regional level, with clear agreements on what they are, how they will be monitored, and with what funding sources. Any monitoring expected from BPA funding to support HLI needs to fit within existing funding levels, which may include reallocation and/or prioritization of existing RM&E funding. Regional level Biological HLI will therefore need to have cost sharing agreements with agencies having shared responsibilities, or be identified as part of a regionally distributed and coordinated network of monitoring.

HLI reporting may require significant changes in the requirements for biological monitoring projects and project implementation tracking, including those funded by BPA. In order for information developed at the individual project level to be combined with other projects and

rolled up to higher levels of reporting and synthesis, more standardized and compatible monitoring protocols and metrics are needed. In addition, standard meta-data that adequately documents data collection and derivations will be required to be able to combine information from different projects and sources into HLI. These issues are being addressed within the Pacific Northwest Aquatic Monitoring Partnership (PNAMP) and Executive Summit on Information Sharing forums, but may require additional resources and regional agency wide participation to succeed. The Council has and is continuing to play a key leadership role in these forums to bring agency participation and commitments and providing regional public process review and outreach for their products.

We believe it is premature to finalize or adopt Biological HLI into the Fish and Wildlife Program until this broader regional effort has advanced further. We are committed to continue to work with the Council in participation and support of the Executive Summit and their ongoing tasks on the development of regional HLI (see the attachment on proposed HLI work) and regional approaches to fish and habitat data needed to support these HLI. In addition, we will continue to work with the region within the PNAMP forum to advance the development of products and agreements that are central to the ability to combine and manage regional monitoring information needed for reporting HLI. (Please refer to the link below.)

http://www.pnamp.org/web/workgroups/HLI/documents/HLI/2008_0430HLI%20SummitTaskDRAFT.doc

BPA is required to report annually on several biological and project implementation performance metrics as part of the FCRPS Biological Opinion. As we continue to work on HLI with you and other agencies, we will ensure that these Biological Opinion reporting metrics are well aligned and integrated with regional and Program HLI.

BPA has provided more specific comments on both biological and project implementation metrics directly to Council staff and in several meetings we have participated in over the last couple of months on HLI. We have not included more specific comments in this letter, as we would hope to continue to provide this input over the next few months as we work together within the regional forums on developing HLI.

We believe this initiative and the recent meetings held by Dr. Tom Karier on this subject are steps in the right direction and we look forward to continue to work with the Council and the region to better define these indicators at both a regional level and a more specific FCRPS level of performance and responsibility.

Sincerely,



William C. Maslen
Director of Fish and Wildlife

From: Maslen,Bill - KEW-4
Sent: Friday, July 11, 2008 12:06 PM
To: Karier, Tom
Subject: Predation HLI

Tom:

I've previously described how benefits are estimated for both northern pikeminnow management and avian predation management, and offered to provide a brief list of metrics that are either measured or estimated and that serve as a basis for estimating benefit of management actions. I've also included a couple of metrics associated with BPA-funding of marine mammal hazing. I hope you find this useful; give me a call if you would like to discuss.

Have a good weekend, and I'll see you in Kalispell. Bill

Potential High Level Indicators for Predation

Northern Pikeminnow Management Program (Project 199007700; implementation of pikeminnow management and evaluation of effectiveness is fully funded by BPA).

- Annual participation (e.g., # of angler-days)
- Annual catch
- Annual and multi-year average exploitation rate
- Estimated reduction in predation mortality (annual and multi-year)
- Estimated number of smolts saved

Avian Predation (Project 199602100; BPA-funded research that includes estimated effectiveness of management actions funded by Corps).

- Estimated population by species and location
- Estimated smolt consumption
- Percent change in population by location (i.e., relative effectiveness of relocation)
- Estimated reduction in predation mortality (annual and multi-year)
- Estimated number of smolts saved

Marine Mammal Predation (Project 200600300; implementation of limited non-lethal hazing below Bonneville Dam is funded by BPA. Most marine mammal work funded by others).

- Corps and NOAAF have lead on what might be considered HLI (e.g., estimating abundance of marine mammals, estimates of observed salmon predation, minimum estimate of total predation, etc.).
- Some metrics that might be reported for BPA-funded project include:
 - Duration (days/hours) of hazing under BPA-funded project
 - # of animals tagged (including species, date of tagging)
 - Observations of tagged animals (??)