



July 11, 2008

Mark Walker
Director of Public Affairs
Northwest Power and Conservation Council
851 SW Sixth Avenue, Suite 1100
Portland, OR 97204

Dear Mark:

Northwest RiverPartners (NRP) supports the Council developing “high level indicators” and collecting such data from a variety of existing sources to educate and inform the public and decision makers on the region’s investment and progress in fish and wildlife protection and enhancement. We recommend that high level indicator information be incorporated into the Council’s “*Annual Report to the Northwest Governors on Expenditures of the Bonneville Power Administration*”, included in summary form as an overview of the regional effort in the Council’s program, and provided in other reports the Council may choose to issue on this topic.

This reporting should occur on a regional basis, not limited to the Council’s program so a complete picture is provided of both the regional investment and high-level results. The Council is the best entity to provide this overview. Its leadership in communicating the investment and results of the region’s fish and wildlife efforts has been extremely valuable to the region and policy leaders that are continually assessing the expenditures of ratepayer funds to protect and recover fish and wildlife in the region.

While we support a proposal to have the Council monitor and report on high level indicators of fish, we do not support including the very specific and detailed “high level indicators” in body of the Program itself. Here’s why:

- The goal should be to provide a “big picture”, policy-level understanding of the scope and magnitude of the regional investment that is being made in fish and wildlife and the results that are being seen, across all four “H’s”. Incorporating detailed “indicators” into the program is too specific and works against this goal.
- CBFWA is already advocating that detailed indicators be incorporated into the program thus becoming requirements triggering more research, monitoring and evaluation that they are willing to conduct and report on. It is the Council’s job to identify appropriate indicators, with input from others, and to monitor and report on the results. The Council’s program needs to be a high level policy document

providing background information and guidance, not a vehicle to create new functions and funding for fish and wildlife entities.

- Including specific indicators directly into the program also gives the false impression that it is somehow BPA customers' obligation to pay for all research and monitoring and fix problems that go far beyond just the dams. It is appropriate and needed to report on the region's effort across all four H's: hydro, habitat, hatcheries and harvest. It is not appropriate to somehow suggest it is a requirement of the Council's program and one the hydrosystem is responsible for.
- High level indicators will necessarily change over time as new data becomes available and the region develops a better understanding of what factors are most important to fish and wildlife management. Incorporating specifics into the program now does not give the Council the flexibility it needs later.

RiverPartners believes the information suggested in the Council's paper is a good starting point and the Council is already collecting and disseminating much of it (see Attachment A). We recommend that it be organized by each of the H's for clarity, and there needs to be more information on the impacts of hatchery production and harvest of both ESA protected and other fish. We also would suggest, for general reporting purposes, focusing on a few of the most important indicators in each one of the "H's" to paint a clear picture.

It also is important to continue to report on ocean conditions and ocean productivity. The large variability in salmon survivals in the ocean clearly swamps any changes that are made to the terrestrial habitat and hydropower operations and a high level indicator report in the "Expenditure Report" and other reports should help to illustrate this fact. As an example, a significant new summary was recently presented to the Council by the Northwest Fisheries Science Center, found at:
<http://www.nwfsc.noaa.gov/research/divisions/fed/oeip/g-forecast.cfm>

RiverPartners thanks you for the opportunity to comment on this important subject. We wholly support the Council collecting and reporting information on the region's fish and wildlife investment and progress. We don't believe "high-level indicators" should be incorporated directly into the Council's program for reasons given above. We look forward to continuing to discuss this issue with you.

Sincerely,



Terry Flores
Executive Director

Cc: Northwest Power and Conservation Council members
Greg Delwiche, Karen Hunt, Bill Maslen, Bonneville Power Administration

Northwest RiverPartners “Indicators” Comments July 11, 2008

Attachment A

Current data being summarized by the Council and included in its annual report on expenditures to Congress:

- Total adult anadromous fish over Bonneville since 1938 when the dam was constructed.
- Ocean temperature cycles since 1900.
- Estimated Inriver Juvenile Survival from Lower Granite to Bonneville dams 1966 - 2007, Hatchery and Wild Fish.
- Estimated Inriver Juvenile Survival from McNary to Bonneville dams, 1966-1980, 1997-2007, Hatchery and Wild Fish
- Fish Counted at Each Mainstem Columbia and Snake River Dam, and at Willamette Falls, 2007
- Total Wildlife Habitat Units Lost and Acquired
- Habitat Units Lost, Species Most Affected
- Wildlife Acres Protected by Agency, Through February 2008
- Salmon and Steelhead Passing Bonneville Dam, 1978
- Estimated Survival Percentage of Juvenile Salmonids Migrating from Lower Granite to Bonneville Dam, 1966 – 2007
- Estimated Survival Percentage of Juvenile Salmonids Migrating from the Upper Columbia River to Bonneville Dam, 1966 – 2007
- Fish Counted at Each Mainstem Columbia and Snake River Dams and Willamette Falls, 2007