

State, Federal and Tribal Fishery Agencies Joint Technical Staff

*Columbia River Inter-Tribal Fish Commission
Oregon Department of Fish and Wildlife
US Fish and Wildlife Service*

January 25, 2006

Greg Delwiche
Bonneville Power Administration
905 NE 11th Ave
PO Box 3621
Portland, OR 97208-3621

Dear Mr. Delwiche,

As the Joint Technical Staff of the U.S. Fish and Wildlife Service, Oregon Department of Fish and Wildlife, and the Columbia River Inter-Tribal Fish Commission, it is our job to provide the best scientific information on effects of the Federal Columbia River Power System (FCRPS) on fisheries resources both to our respective agencies and to the Region as a whole. Many of these evaluations are related to in-season management issues, which require a variety of applied science skills and most importantly, experience with the FCRPS operations, fish biology and ecology, and analytical assessment techniques in order to provide assessment in a timely manner. For the last 23 years, an integral component of our ability to provide the best scientific information has been the scientists at the Fish Passage Center (FPC). Indeed, the FPC was created to primarily serve as an independent technical resource for the state, tribal, and federal fishery management agencies.

There are at least three elements that uniquely distinguish the scientists at the FPC apart from any other groups of individuals currently in existence or any other group of individuals that could be amassed. These are the level of direct and primary FCRPS experience of the scientists at the FPC, their availability and timely response to the technical staff which rely upon them, and the scientific rigor and merit of the analyses they provide to the technical staffs.

Experience

You may be unaware that the eleven professionals at the FPC **have a combined 120 years of direct and primary experience on fisheries and hydrological issues within the FCRPS.** Throughout their 23 years of existence, the scientists at the FPC have provided technical analyses based on their extensive experience to the state, tribal, and federal fisheries management agencies. These are years of experience where the sole and primary focus was the fisheries and hydrological issues associated with the FCRPS. **No other group of individuals has this much direct and primary experience.** These are years of experience spent directly interacting with and providing technical assistance to the state, tribal, and federal technical staffs, and over the 23 years of FPC existence the Joint Technical Staff have developed a high level of

trust and reliance upon the scientists at the FPC. **No other groups of individuals have or could achieve this level of trust and reliability with the state, tribal, and federal technical staffs.** As the FCRPS is a complex system with a complicated history, it has been critical to have the scientists at the FPC as a resource for synthesizing this history and recalling this history when providing technical analyses. Without the historical continuity and knowledge possessed by the FPC scientists, our ability to understand the historical context and provide the best scientific assessments would be severely compromised. **No other group of individuals has the extent or depth of historical knowledge about the FCRPS.** These important components of the experience of the scientists at the FPC cannot be assumed by any other group of individuals and are simply irreplaceable. **Any elimination of or reduction in the scientists at the FPC will result in a substantial loss of historical knowledge and impair our ability to provide the best scientific information to our respective agencies and the Region as a whole.**

Proximity, Availability, and Timely Responses

Because the Portland/Vancouver Metro area is where the vast majority of the FCRPS assessment and management processes occur, and where the fishery management agency technical staffs are located or meet, the location and availability of the scientists at the FPC in Portland has been a critical element of our ability to interact with and obtain technical assistance from FPC staff. FPC scientists have taken the time to attend and participate in all of the major public Regional Forum processes, which primarily take place in the Portland/Vancouver Metro area. Their attendance and participation in these meetings has been essential for assisting and providing analyses to the technical staffs. Most importantly, the FPC scientists are always available for in-person technical assistance and **consistently demonstrate rapid responses to technical requests.** These levels of interaction and participation would not be possible if the FPC was located outside of the Portland area. **Substituting some other group of individuals outside the Portland area to perform the technical assistance role of the FPC scientists would severely erode our ability to provide the best scientific information to our respective agencies and the Region as a whole in a timely manner.** Many of the analyses FPC scientists perform relate to in-season management issues, which require their scientists' collective experience to rapidly deliver rigorous and error-free analyses.

Scientific Rigor and Merit

Consistent with all of the independent reviews of the scientific work conducted by the FPC scientists, we have been highly impressed with the outstanding level of scientific rigor and merit with which the FPC has conducted its work and provided technical assistance to the state, tribal, and federal technical staffs. Indeed, there is no other group in the Region which has had to endure such levels of scrutiny as the FPC staff. Despite this scrutiny, the technical analyses conducted by the scientists at the FPC have consistently proven to be of high scientific rigor and merit. The ISAB has twice reviewed the work conducted by the FPC and found it to be of "high technical quality."

A recent case study that exemplifies the rigor with which the FPC scientists conduct their work can be seen in the analyses of the effects of the 2005 summer spill program. In response to requests to assess effects of the court-ordered spill in Summer 2005, the FPC released and published on their website three memos that consisted of 18 typed pages which clearly described the methods, results, and discussion of their analyses, along with appendices which contained the

data that were utilized in their analysis. The analyses were thoroughly described, along with the important assumptions and qualifications that needed to be considered. The documentation of this work was more than sufficient to allow for any other scientist to duplicate and verify the analyses and results. These documents were very helpful to the state, tribal, and federal technical staff in determining their technical assessment of the summer operations in 2005. This case study exemplifies the high scientific rigor and merit with which the scientists at the FPC conduct their work. **Replacement of the FPC scientists will eliminate the high-quality scientific information that is necessary for the state, tribal, and federal technical staff to provide the best scientific information to their respective agencies and the Region as a whole in a timely manner.**

Additional considerations


With the ongoing remand process and need for constructive collaboration among the regional entities, it seems highly unlikely that state, tribal, and federal technical staff will be able to provide input to their agencies and the Region as a whole without the technical assistance of the FPC scientists. **To achieve meaningful participation by state, tribal and federal scientists in the collaborative efforts towards solutions, at the technical level this will be extremely difficult, if not impossible, without the technical assistance provided by the FPC scientists.** The attached request for FPC technical assistance in evaluating the recently-developed COMPASS model illustrates the continuing and ongoing technical assistance needs by the states and tribes in the remand process.

In summary, the Joint Technical Staff believe that any reduction in, substitution for, or relocation of the scientists at the Fish Passage Center will deleteriously impact the ability of the technical staffs to provide the best scientific information to their respective agencies and the Region as a whole in a timely manner. We respectfully request that the BPA maintains the duties and funding for the Fish Passage Center scientific staff and their capabilities to avoid these impacts.

Sincerely,



Richard Kruger, ODFW



Tom Lorz, CRITFC



Steve Haeseker, PhD, USFWS



January 12, 2006

Michele DeHart
Fish Passage Center
1827 NE 44th Ave, Suite 240
Portland, OR 97213

Dear Michele:

As you know, the National Marine Fisheries Service is collaborating with states, tribes and others in the development of a new Biological Opinion for the Federal Columbia River Power System. For your background information, we have attached a document describing this, which includes a discussion of the collaboration process, jeopardy analysis framework, and initial thinking on the scope of the proposed action.

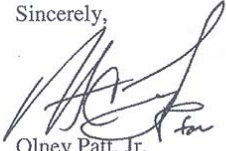
Looking ahead to the substantive aspects of the collaboration, we believe that technical assistance from the Center will be essential to our meaningful participation in this process. At this time, we are requesting the technical assistance of the Center (provision of data and analyses) with respect to:

- Formulation and technical assessment of performance measure options, e.g. dam specific and system survival measures;
- Identification and technical assessment of project operation and configuration alternatives intended to increase salmon survival;
- Development and application of a new fish passage model to replace SIMPASS;
- Development of a salmon life cycle model to assist in our efforts to partition the human induced causes of salmon mortality;
- Articulation of long-term monitoring and evaluation strategies related to the effects of the FCRPS.

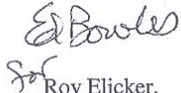
These are broad areas of endeavor and the specific data and analyses needed from the Center will evolve as the states, tribes and federal agencies proceed with the collaboration effort. We ask that you and your staff work with Ed Bowles (ODFW), Guy Norman (WDFW), and Rob Lothrop (CRITFC) to further refine and carry out this request. They will be sharing your technical analyses with the others involved in the collaboration.

Thank you for your consideration of this request.

Sincerely,



Olney Patt, Jr.
Executive Director
Columbia River Inter-
Tribal Fish Commission



Roy Elicker,
Acting Director
Oregon Dept. of
Fish and Wildlife



Jeff Koenings,
Director
Washington Dept. of
Fish and Wildlife