

State, Federal and Tribal Fishery Agencies Joint Staff Letter

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

November 29, 2007

James Ruff
Northwest Power and Conservation Council
851 SW Sixth Ave. #1100
Portland, Oregon 97204

Dear Jim:

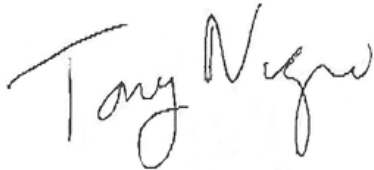
We understand that at its December meeting the NPCC will be making funding decisions regarding the Comparative Survival Study (CSS) in response to comments and recommendations from the Independent Science Advisory Board and Review Panel. This is an important funding decision in the Columbia River basin and a decision that should be well informed. Neither we nor our CSS Oversight Committee have had the opportunity to further discuss the comments and recommendations of the ISAB/ISRP with them however; we offer the following comments and recommendations.

We recommend that the NPCC approve marking of all groups as proposed by the fishery managers in the CSS. The ISAB/ISRP review recognized the CSS is successfully implementing a large-scale monitoring program and the review supports the PIT tag marking of additional wild downriver groups to determine SARs and other population metrics for these stocks as part of regional monitoring and evaluation. Many stocks in addition to those of Snake River origin are affected by the operation of the FCRPS and the measures mitigate for those effects, including the downriver steelhead populations proposed for marking that are listed under the ESA. Eliminating these downriver mark groups or delaying the implementation of mark groups will cause critical gaps in these time series. These gaps in SARs will make assessing population status and evaluating restoration and recovery measures difficult and less timely.

More specifically, the ISAB/ISRP indicated that CSS biological objectives (1), (2), and (3) and associated work elements meet scientific review criteria – estimate SARs, in-river survival rates, T/C ratios and make comparisons against hydro goals. The downriver populations proposed for tagging are needed to satisfy these three objectives.. The ISAB/ISRP did not recommend eliminating the tagging of downriver groups for these monitoring and evaluation purposes. Building a time series of survival among representative population groups provides important empirical data for assessing the relationship of this survival information to environmental effects and management actions. This monitoring and evaluation approach does not assume that survival differences are only attributable to hydrosystem impacts.

At an appropriate time, the Oversight Committee would like to have the opportunity to further discuss the comments or address concerns with the ISAB/ISRP. The ISAB/ISRP review of CSS Ten-Year Retrospective Report was overall very positive, finding that the design, implementation and interpretation underpinning the report were very good, and that the CSS successfully implemented a large-scale monitoring program. We believe that had the schedule afforded the fishery managers the opportunity to further discuss technical issues with the ISAB/ISRP, that all issues concerning downriver marking could have been resolved. The CSS Oversight Committee will provide a separate technical response to the ISAB/ISRP comments relative to the downriver and upriver comparisons. We look forward to further discussions on this and other important matters.

Sincerely



Tony Nigro
Oregon Department of Fish and Wildlife



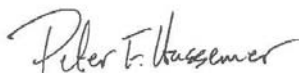
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Columbia River Intertribal Fish Commission



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