



Northwest Habitat Institute

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Fish and Wildlife Committee Members
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204

RE: Committee Decision on Program Evaluation and Reporting Committee (PERC) Draft Recommendations

Dear Fish and Wildlife Committee Members:

Initially, we would like to remind everyone about some common business and professional protocols. Specifically, it is highly insensitive when a project that has been long standing and in good status first finds out about the potential to be terminated in a document that is globally distributed. To put people through this, especially when there is a fatal flaw in the recommendation, is unconscionable. We all must remember that people are these projects.

This is a response to the PERC Committee draft report regarding the Northwest Habitat Institute (NHI) and the Habitat Evaluation Procedures (HEP) projects. Specifically, there are 4 reasons why terminating the NHI project is not justified. First, the recommendation is contrary to Council's stated policy, thus making it fatally flawed. The stated policy that it violates is, *all data collected by program funded projects must be publicly accessible*. The NHI project is a regional data management project that focuses on spatial habitat and wildlife information. We are the only regional habitat and wildlife data project and are identified as a core data project for the Fish and Wildlife program. The project currently maintains and serves over 5,000 files that were developed and made accessible for subbasin plans. Fifty-nine of the subbasins uses some portion or cited these data. Additionally focal species range maps and other pertinent regional GIS, mostly developed by NHI and in partnership with others at a cost of several million dollars, are also housed with the project. These data are currently being accessed by the public and other resource managers today. The above policy calls for their continued maintenance and accessibility to the public, which we have implemented since 2004 and continue to enhance with new information. [also see page 8 in Draft PERC Memorandum 9/27/2012 stating, "All projects collecting data through the Program should ensure the longevity and usefulness of the collected data by using data management approaches and tools that facilitates its sharing such as by providing comprehensive documentation of metadata and employing data stewards". Page 9 stating All individual project data that are required for program evaluation and reporting should be made accessible by making these data web-services accessible or by submitting these data to regional data-management project. For fish data and wildlife data, this appears to be fulfilled by existing regional data-management projects..]

Second, there is no cause determined for terminating the NHI project. That is, we are an outstanding project, passing all our reviews by the Independent Scientific Review Panel (ISRP), our data sets have recently been cited by the Independent Scientific Advisory Board (ISAB), and we have met all of our progress reports and deliverables. We have also contacted Bonneville Power Administration (BPA) and they stated, we are in good standing and our work is well respected. The stated purpose of the PERC was to provide guidance that would be directed towards existing and evolving regional level data-management projects and data-sharing processes. Termination is not guidance when the project is meeting the Fish and Wildlife program's policies, needs, and objectives. Further, other data management projects have not been treated in this manner but rather given the following recommendation: "Budget reduction within the range of 10 to 15%, which is commensurate with the reduction being sought from project managers throughout the Columbia River Basin". The NHI project is a habitat based project and so is the Fish and Wildlife Program. NHI products, like the Wildlife-Habitat Relationships in Oregon and Washington book, considered a definitive work for identifying and defining habitat components for both fish and wildlife, has been adopted into the Fish and Wildlife program. In addition, the

ISAB also cites one of our products as an essential data set. Further, our project has been cited in BioScience as a key data source and our mapping protocols have been reported in the National Academies of Science. We have over 70,000 copies of regional books in circulation hallmarking the project's wildlife information.

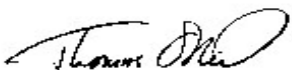
Third, the recommendation to terminate the NHI project goes against stated desires for the Fish and Wildlife program. The PERC document specifically references a move forward with the High-Level Indicators (HLI's) and the Wildlife Monitoring and Implementation Strategy (WMIS). As for an HLI example, there is a call to address wildlife species diversity in the Basin by evaluating functional critical wildlife species diversity over time. Last we looked; NHI is the only project capable to do this. Additionally for resident fish, we were working to develop the first regional range maps for all of these species. Regarding WMIS evaluation and reporting, please see the attached letter from the Wildlife Focus Committee stating we are the wildlife project to do this work; so if it is not us then whom?

Next, as is the case in the ISRP process, there should be a protocol that the PERC read our proposal prior to a presentation. It is very hard for a reviewer to ask good questions that leads to guidance and a sound recommendation without context. Remember, we only had that one time to answer their questions. If they had, it may have been clearer as to why we presented where the data projects should be going rather than where we have been. Our project develops products that can be used by both fish and wildlife; our products do not overlap with any of the other data management projects. We clearly stated a need for spatial context for all information being developed because it is currently severely lacking. Additionally, the ISAB calls for more comprehensive landscape approach to achieve more effective conservation and restoration [ISAB 2011-4]. This is one reason we showed the project focal habitat mapping of the Willamette Valley that included riparian [costing more than \$600,000 of which the Council program has funded less than 30%] and is used to inform as well as meet some of the requirements of the Willamette Valley Biological Opinion.

Fourth, we took steps to save the Fish and Wildlife Program money. Our proposal was proactive on this issue and by working with Council and CBFWA staff, and presenting to the Wildlife Advisory Committee, came to a conclusion that was reiterated by Paul Ashley at the PERC meeting, that Habitat Evaluation Procedures (HEP) project should merge with NHI. This is the best fit. Additionally, the merger with NHI answers the need to develop a succession plan (sub-item under point #1). We estimate that the merger could save cost that could range from \$30,000 to \$40,000 or more based on 2012 budgets. Thus, it does not make sense that the only project in recent categorical reviews that recommended a project merge to be more cost and project efficient results in being terminated? We see this merger as still valid, and because cost savings are paramount at this time more than appropriate. The HEP recommendation further state to reconvene the Wildlife Crediting Forum, its purpose to address: 1) the need, if any, for future HEP surveys, 2) need to archive the existing vegetation transects data into a central repository, and 3) forecast the need to access information such as GIS maps or tools from NHI in the future. We see that point #2 is addressed by the existing policy *all data collected by program funded projects must be publicly accessible*; thus answered. Therefore, the Council's recommendation on page 12 of the PERC Memorandum 9/27/2012 is the appropriate response. In our recent conversation with BPA, we have discussed doing this work over a 2-year period because of the need to meet other project objectives and working with about a 10% reduction. Lastly, the remaining points under #1 and #3 are in need of being addressed.

In conclusion, the NHI project helps provide the best available scientific knowledge to the region for sound decision making. We look forward and stand ready to work with the Fish and Wildlife staff, PERC and Council to resolve these issues.

Respectfully,



Thomas O'Neill
Director

Project 2003-072-00
Integrated Habitat and Biodiversity Information System (IBIS) for the Columbia River Basin
Some Links to Program Language

1. **Connection to the Pacific Northwest Electric Power and Planning and Conservation Act** - The elements of NHI's IBIS project serve to address a wide-ranging scope of needs, as identified by various regional authorities and reports, including the Pacific Northwest Electric Power and Planning and Conservation Act, the ISRP Retrospective Report, the Fish & Wildlife Basin-level Wildlife Objectives, the Reasonable and Prudent Alternatives, and the Data Management in Support of the Fish and Wildlife Program. The Pacific Northwest Electric Power and Planning and Conservation Act address the inclusion of fish and wildlife into the planning for the region. Specifically, it calls for: 1) coordination of fish and wildlife management and research and development [839b(h)(2)(c)], and 2) base and support programs with the best available scientific knowledge [839b(h)(6)(a)]. The Act also calls for the development and implementation of a fish and wildlife program and to take into account at each relevant stage of decision-making processes the program adopted by the Council [839b(h)(d)(i) and 839b(h)(11)(a)(ii)]. The Council has developed and adopted a plan called, 2000 Columbia River Basin Fish and Wildlife Program – A Multi-Species Approach for Decision-making. Amendments to the Program were vetted and adopted in October 2009 (Council Document 2009-09), and in this amendment process new measures for High-Level Indicators, and Research, Monitoring and Evaluation, Data Management, Coordination were made.

2. **2009 Amendment** – One key measure is developing consistency and integrating efforts where practical. To help with consistency, the Wildlife-Habitat Relationships in Oregon and Washington book especially its definitions and components were also adopted into the program via the 2009 amendment process. In this program plan, there are several statements that directly support IBIS as proposed, specifically: (A) one of the underpinnings of the program is that it is habitat based – IBIS is all about habitat in that it has already collected, compiled and is synthesizing the latest scientific thinking on fish and wildlife as it relates to their habitats. (B) achieving a vision for multi-species during a time of multi-objectives requires coordination of information and actions, which calls for an appropriate structure to be in place from which to plan and coordinate – regarding information systems about fish and wildlife habitat relationships, there is no current system that addresses the entire Columbia River Basin. IBIS addresses this need. (C) making information readily available is a specific strategy of the program plan – it states (p. 46, paragraph 3), “ Dissemination of data via the Internet: The Council will initiate a process for establishing an Internet-based system for the efficient dissemination of data for the Columbia Basin. This system will be based on a network of data sets, such as Streamnet, Northwest Habitat Institute, Fish Passage Center.... the function of each data site, or module will be clearly articulated and defined.” IBIS addresses this need along with defining its purpose. (D) implementing subbasin plans is a principal portion of the program plan – subbasin planning brings together multiple agencies, objectives, plans and ideas with the hope of developing a collective vision that incorporates joint biological objectives and strategies. Currently, IBIS makes information available to subbasin planners in part because our data sets have been collaboratively developed; peer reviewed and has defined terminology. IBIS served as regional technical support for subbasin planning with 59 subbasins incorporating its information into their plans. The foremost purpose for developing IBIS is to build a common understanding of fish and wildlife resources for better management. In the ISRP Retrospective Report, there are several places that support the continued development of IBIS and its associated modules. Specifically, under Wildlife Monitoring and Evaluation (p.35),

they voiced a concern “that monitoring and evaluation of wildlife projects and programs should not rest solely on a HEP-based analysis”. This concern was also reiterated under the Wildlife Section (p.72&73). They also recommend that the fish and wildlife elements be fully integrated in continuing the development of Subbasin Plans when they emphasized “coordination, subbasin-scale planning that integrates habitat, wildlife, fish goals, and that incorporates explicit consideration of ecological relationships, including linkages amongst multiple populations of fish, wildlife and their habitat” (p.75 & 76 also in Technical Guide for Subbasin Planners, Council Document 2001-20). ISRP also cites a need for a habitat GIS spatial library and repository when it states the need to continue to do watershed assessment by providing a systematic way to understanding and organizing ecosystem information (p.61); noting that the feasibility of collecting data on current and future status of focal species was generally ignored in many subbasin plans (p.76) and; expressed the difficulties in establishing coordinated working groups and difficulty in working with the assessment tools (p. 70). Additionally, the ISRP recommended that data of all projects be made available via the regional database projects (p.31). IBIS is a regional data project and this was most recently re-affirmed in BPA’s Additional Information and Responses to FAQ’s for FY07-09 Solicitation Participants, Section #9. Finally, the ISRP also supports the need for habitat mapping when it states, “develop a sound census monitoring procedure for trend, based on remote sensing, photography and data layers in GIS. Landscape changes in terrestrial and aquatic habitat and land use should be monitored for the smallest unit...” (p.28).

Other Pertinent Information

As part of our Council/BPA match we have a \$100,000 ESRI grant for support for our geographic information system (GIS). Additionally we obtain another \$35,000 to \$50,000 in-kind support for the project a year. Further, we have helped develop a number of regional publications with more than 70,000 copies in circulation within the region to help educate the public and school children about our wildlife resources.