

October 18, 2021

Ms. Ball and Mr. Armentrout  
Bonneville Power Administration  
905 NE 11<sup>th</sup> Avenue  
Portland, OR 97232

Dear Ms. Ball and Mr. Armentrout:

The intent of this letter is to express our desire to transition SMP and CSS to a portfolio-style management that will better respond to management needs under monetary constraints beginning in FY2022.

The Smolt Monitoring Program (SMP) and the Comparative Survival Study (CSS) have been flat funded since 2017; during this period of flat funding, PIT tag costs have increased three times. As stated in the Council's 2020 Fish and Wildlife Program Addendum, this increase in raw material cost combined with inflationary increases associated with implementing and managing these projects has decreased their long-term effectiveness. This reality led to the Idaho, Washington and Oregon's Fish and Wildlife agencies to work with tribal and federal managers to review these two cooperative regional programs.

There was broad regional agreement amongst Fish Managers that increasing the number of known-origin juvenile anadromous salmonids across the Columbia Basin is a critical data need, and that this data need is a higher priority than data currently collected at some SMP sites. Shift program activities would also provide the opportunity to reduce the handle and mortality of ESA listed salmon and steelhead. These factors, combined with continued flat funding led the regional Fish Managers to direct the Fish Passage Center to submit a proposal to BPA on July 14, 2021, that shifted funds from the SMP to the CSS while keeping total cost of the combined projects flat relative to FY 2021. These changes were incorporated into the 2022 CSS budget submitted August 31 and the FY 2022 SMP budget submitted recently.

Idaho, Washington, and Oregon support the SMP to CSS funding shift because it: (1) better meets regional interests in meeting salmon recovery information needs; (2) updates our monitoring strategy to fit the current resolution of population management (i.e., Major Population Group); (3) improves decision making capability; and (4) is funding neutral within the co-managed regional monitoring programs. The states support the increased efficiency and flexibility to meet regional management needs that using a portfolio approach for these two programs would bring (i.e., both programs managed under a single budget).

We are now concerned that this decision by the regional Fish Managers will not be implemented in FY 2022. BPA has delayed discussing the proposal with the States three times since early August. Furthermore, recent communication between BPA staff and the Fish Passage Center addressed the reduction of the SMP budget, but instead of shifting the funds to CSS as directed by the Fish Managers, BPA is suggesting that Fish and Wildlife Program funds made available in

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the portfolio process be used to fund fish condition monitoring at two of these sites for at least the next three funding years.

We do not feel that this is an acceptable approach. Fish and Wildlife Program funds should not be used to support activities that are clearly part of the Operations and Maintenance program and just as clearly the responsibility of the Action Agencies to fund as part of operating the projects.

We are asking that implementation of CSS in 2022 not be delayed, as doing so jeopardizes many monitoring initiatives, including the reach survival estimate Term and Condition in the 2020 NMFS Biological Opinion. We also find it troubling that BPA has not communicated with the States' fisheries agencies about their decision or decision-making process regarding the full proposal, which has made BPA's intent unclear. We request that BPA meet with Idaho, Washington, and Oregon fisheries agencies without further delay to discuss the merits of the CSS/SMP proposal as written for FY 2022 and develop the steps to a future where the two programs are managed as a portfolio.

Sincerely,



Lance Hebdon  
Chief, Bureau of Fisheries  
Idaho Department of Fish and Game



Mike Harrington  
Fish Division Administrator  
Oregon Department of Fish and Wildlife



Kelly Cunningham  
Fish Program Director  
Washington Department of Fish and Wildlife