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August 24, 2011

The Honorable Chris Gregoire Governor Post Office Box 40002 Legislative Building Olympia, Washington 98504

Dear Governor Gregoire:

In 2008, you appointed me Chair of the Washington Forum on Monitoring Salmon Recovery and Watershed Health (Forum). The Forum was a committee composed of representatives of state, federal, tribal, regional, local, and private agencies and organizations, charged with coordinating the wide variety of monitoring programs focused on salmon recovery and watershed restoration. As you know, the Forum was originally created by Executive Order during former Governor Locke's administration, then later codified in statute and given a sunset date of June 30, 2011.

As the Forum has now passed its sunset date, I am pleased to report that we successfully accomplished our main tasks and objectives (the Forum's accomplishments are summarized below). Along the way, we also built important relationships and significantly improved communications and trust across the many agencies, organizations, and public/private partners that have a stake in monitoring salmon and watershed health. I can honestly say I never found any representative to the forum who didn't sincerely want to make things better.

However, despite meeting some important milestones, monitoring remains a challenging issue to fully understand and manage. Much of that simply reflects the realities and deep challenges associated with managing in a multi-jurisdictional environment, and I don't believe there is any greater overlap in monitoring than you would find in any other agency function. Overall, the Forum model was a good one for bringing together all the disparate parties involved in that work, and some form of coordinating body (with staff support) will likely be needed in the future if progress is to be maintained. With that thought in mind, I have attached a few

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observations from my tenure as Chair of the Monitoring Forum. Perhaps these will prove useful as agencies and organizations continue their work to make monitoring more effective and efficient.

Thank you for the opportunity to have served you and the people of this state in the capacity of Chair of the Forum on Monitoring.

Sincerely,

Bill Wilkerson

(Former) Chair

Washington Forum on Monitoring Salmon Recovery and Watershed Health

cc: Chairs, Legislative Natural Resources Committees

Marty Loesch Marty Brown

BD Wales on

Natural Resources Cabinet

Forum Members

Observations on coordinating monitoring for salmon recovery and watershed health:

A multitude of agency needs, mandates, and authorities drive monitoring programs toward parochialism. There are dozens of government agencies and organizations with specific responsibility or authority over some aspect of salmon and watershed management. Most agencies need (or are mandated to) collect monitoring data related to their specific authority (e.g. fish data, water quality data, forest health, shellfish abundance, etc.). Different types of data naturally require different sampling methods, sampling designs, and expertise. Funding provisos also force most monitoring programs to narrowly focus on the particular legal requirements and regulatory functions of the implementing agency (i.e. agencies monitor only what they are specifically responsible for, in part because they lack the authority to monitor — or the authority to spend money monitoring — other things). In the absence of any oversight, guidance, or standards, existing drivers cause most monitoring programs to become very parochial and optimized to meet individual agency needs, rather than maximizing overall collective benefits (e.g. by requiring standardized methods or data management systems to make data easier to share between agencies).

Costs to revise existing monitoring programs can be substantial. Many current monitoring programs were developed years ago to meet specific agency requirements, using whatever technology and methods were deemed best at the time. Revising these programs now to make data easier to share (by standardizing around different methods, or migrating historic data to new data management systems) can be very costly and typically provides little direct benefit to the implementing agency (irrespective of any collective benefits). Revising existing programs after years of operation also risks disrupting historical data sets, compromising our ability to track long-term trends from these legacy programs. High costs and disrupting long-term data sets are powerful incentives against revising legacy programs.

Monitoring overlaps occur more often between levels of government than within the same level of government. Within the same level of government (e.g. among state agencies, or between counties) there is relatively little duplication of monitoring because most agencies have clearly different missions or clearly different geographic jurisdictions. There is, however, occasional overlap between levels of government (e.g. state, federal, tribal, and local agencies sometimes implement monitoring programs with similar objectives in the same region or watershed, often using different methods, sampling designs, and data management systems. Where funding sources are controlled (e.g. when state agencies provide grants to local or regional organizations), we can generally require that monitoring be well-coordinated with state interests. But when federal, state, tribal, or local agencies fund their own monitoring programs, or draw funding from third-party sources we don't control, monitoring programs can sometimes overlap and appear redundant. Coordinating monitoring between levels of government is challenging because (outside of funding), there aren't direct lines of authority between state, federal, tribal, and local agencies (with regard to monitoring).

The direct savings from coordinating monitoring may be modest at best. Within the same level of government, most monitoring programs only meet minimum requirements and there doesn't appear to be large savings by combining or eliminating programs (albeit there are always efficiencies that can be found and these are certainly worth pursuing). Between levels of government, better coordination could potentially reap more significant savings.

Opportunities to answer big questions are lost through lack of coordination. When different monitoring programs use incompatible methods or data management systems (both of which are common), it makes rolling-up data from different agencies and geographic regions difficult. Although individual agencies may be meeting their requirements, the on-going difficulty of combining disparate data sets means we lose opportunities to analyze larger sample sizes, take into account different variables, and conduct more robust analyses. This reduces our ability to understand large problems and make better strategic decisions. It also perpetuates individual monitoring programs which may require many years of additional effort to acquire the same amount of data that might be available if monitoring efforts were better aligned.

The key challenge to coordinating monitoring is to help agencies find ways to align their monitoring methods, sampling designs, and data management systems without compromising their specific legal requirements, and without bearing undue (and unfunded) costs. The regional, statewide, and cross-agency benefits of coordination rarely accrue to the individual action agencies charged with implementing specific, narrowly-focused monitoring programs required under their particular mandates. The benefits of coordination more often accrue to oversight or regional planning/reporting agencies than to individual action or regulatory agencies with a more narrow focus. Action agencies resist changing or modifying monitoring programs which are currently meeting their needs, especially when doing so might compromise the data they need or require funding they don't have.

Coordination costs time and money. Not coordinating incurs long-term costs (and opportunity costs) that are harder to see and quantify. Most agencies conduct monitoring only to meet specific requirements and they invest in monitoring only to the extent necessary. Any additional requirement – staffing and preparing for coordination meetings, cross-training field staff, modifying sampling designs, adding new data elements to be collected, altering data formats or database structures, adding new reporting requirements, etc. – represent additional and typically un-funded costs. Not coordinating around these elements incurs no immediate costs, but over time adds significantly to the overall cost of monitoring while reducing our ability to answer big questions.

The Washington Forum on Monitoring Salmon Recovery and Watershed Health A brief history and synopsis of important milestones

2004: Forum created by Executive Order 04-03; convenes for the first time in August

William Ruckelshaus and Jeff Koenings appointed co-chairs

Identified and filled many juvenile migrant monitoring gaps through the Governor's budget Recommended indicators for "State of Salmon in Watersheds" report

Advocated for funding for statewide habitat and water quality probabilistic monitoring

2005:

Developed monitoring recommendations for the Salmon Recovery Regions

2006:

Biennial Report on Monitoring for OFM and the Legislature (Report on implementation of Comprehensive Monitoring Strategy recommendations and actions)

Report to the Office of Financial Management concerning monitoring programs and associated databases (This inventory served as the starting point for the Natural Resources Reform effort on coordinating environmental monitoring)

2007:

Developed "Washington State Framework for Monitoring Salmon Populations Listed under the Federal Endangered Species Act and Associated Freshwater Habitats"

Forum created in statute (RCW 77.85.250)

Forum reviews state agency budget proposals related to monitoring for OFM and the Legislature

2008:

Bill Wilkerson appointed Chair

Forum comments on Northwest Power and Conservation Council's Columbia Basin Fish and Wildlife Program

Forum reviews state agency budget proposals related to monitoring for OFM and the Legislature

2009:

Forum adopts High Level Indicators (December 2009)

Forum transmits formal comments on NOAA's Draft "Guidance for Monitoring Recovery of Salmon and Steelhead Listed under the Federal Endangered Species Act (Idaho, Oregon, and Washington)" (Federal Register Vol 74, No. 123).

Forum reviews state agency budget proposals related to monitoring for OFM and the Legislature

2010:

Forum adopts Protocols for monitoring Forum indicators (June 2010)

Completes SRFB Monitoring Program Review (program evaluation, overall strategy, gaps, technical corrections, funding allocations)

Forum comments on NPCC Monitoring, Evaluation, Research and Reporting Plan Forum co-chairs (with BPA) PNAMP Regional Effectiveness Monitoring Workgroup Forum reviews state agency budget proposals related to monitoring for OFM and the Legislature

2011:

Forum sunsets June 30, 2011

Forum drafts MOU for agencies to guide future monitoring coordination

Major Accomplishments/Products of the Forum include:

<u>Provided a regular venue to meet and discuss policy and technical issues related to monitoring</u>: The quarterly meetings are one of the only places where agency and organization leaders meet in-person to share perspectives, ideas, and concerns around this complex topic that most resource agencies are mandated to conduct, but which remains elusive to coordinate and streamline.

<u>Forum Framework</u>: The Forum's statewide framework for monitoring ESA recovery of fish, habitat, and water quality provides a path forward to meet NOAA's requirement for assessing data necessary for de-listing ESA-listed salmon, has helped guide WDFW's priorities for filling many juvenile salmonid monitoring gaps, and served as the basis for recommendations to regional salmon recovery regions to improve statewide consistency for monitoring salmon recovery.

<u>High-level indicators</u>: The Forum indicators have helped frame the State of Salmon in Watersheds Report, and have helped align the monitoring objectives of the Forum with those of the Puget Sound Partnership, the NW Power and Conservation Council, and other regional bodies.

<u>Protocols for measuring the parameters associated with the high level indicators:</u>
Standardizing field data collection methods improves our ability to compile and assess data from multiple, independent agencies and organizations. Standardizing protocols is an important step to leverage monitoring conducted (and paid for) by other entities.

Advisor to the Salmon Recovery Funding Board (SRFB) on monitoring priorities, gaps, and approaches – helping to direct up to \$2.65 million dollars/year in federal Pacific Coast Salmon Recovery Funds. The Forum has been an effective advocate for federal funding for several core monitoring programs.

Annual review of state agency budget proposals related to monitoring salmon recovery and watershed health. The coordination and internal review process was arguably of greater value than the resulting recommendations – many proposals were refined and improved as a result of the Forum review.

<u>Biennial "State of Salmon in Watersheds" report</u>: Forum input helped shape the indicators and reporting measures, and many Forum initiatives were intended to compliment the SOSIW objective of compiling data from multiple sources.

<u>2006 Report to OFM</u> (an inventory of monitoring programs and databases). This inventory was originally intended as an assessment of state progress in meeting the objectives of the Comprehensive Monitoring Strategy. More recently, it served as the starting point for identifying agency monitoring programs for the Governor's Natural Resources Reform Initiative to coordinate environmental monitoring.

<u>One State Voice</u>: The Forum has collected, consolidated, and reconciled individual state agency comments on a number of federal monitoring documents circulated for general review and stakeholder input (e.g. NOAA guidance, NWPCC MERR Plan, etc.). The Forum's efforts have

helped reconcile contradictory comments from separate agencies and present a "unified front" to federal agencies seeking comments from state interests.

<u>Coordination point with the Pacific Northwest Aquatic Monitoring Partnership (PNAMP) and other federal/regional bodies</u>: On a simple logistical level, it is often more efficient to discuss regional monitoring issues at the Forum and then represent the collective perspective of multiple agencies with one or two representatives attending PNAMP meetings, rather than depend on PNAMP to separately poll multiple representatives from a variety of agencies which haven't discussed the issues together, or depend on input from whoever is able to attend the many meetings and initiatives hosted by PNAMP and others.