



Department of Energy

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Bonneville Power Administration
P.O. Box 3621
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October 19, 1998

In reply refer to: [EWI-4](#)

[Mr. Brian Brown](#)
[National Marine Fisheries Service](#)
[525 NE Oregon Street, Suite 500](#)
[Portland, OR 97232](#)

Dear Mr. Brown:

I am writing to clarify my comments regarding the Plan for Analyzing and Testing Hypotheses (PATH) Weight of Evidence Report as presented at the October 1, 1998, Implementation Team (IT) meeting. I am concerned that my comments were not understood by the PATH facilitator in a manner I intended, and that this misunderstanding has continued into a recent E-mail letter to the PATH Scientific Review Panel and other participating scientists.

The E-mail said that I had commented that the report prepared by the Environmental Software, Services and Technologies (ESSA Technologies) was an "unbalanced" synthesis of the information and further implied that I had stated that the arguments presented to the panel in the Weight of Evidence (WOE) workshops were unbalanced. The facilitator requested each of these scientists to respond to these statements in letters addressed to the IT, which you have recently received. A copy of the letter from the facilitator to the Scientific Review Panel (SRP) members is enclosed.

I provided my statements at the IT from a prepared paper, and I have confirmed those statements through a review of the meeting's tape-recorded documentation by the meeting recorder. A copy of that documentation is also enclosed with this letter. I did not say that either the WOE report or the presentation to the SRP were "unbalanced" or unfairly represented. However, I did say that I and several other PATH participants believe there is additional information that needs to be provided to the synthesis of information. I noted that there were extremely tight time lines, but pointed out that we had expressed concerns about the manner in which the WOE report was being developed and about the adequacy of the information that was provided in the report.

I believe each of the points I made were factually correct and important to the IT's understanding of this report. PATH has generally operated under a rule of consensus. In this instance, a report was submitted to the SRP that was not a consensus product. Neither the PATH Planning Group nor other PATH participants saw the final version of the WOE document before it was sent out to the SRP. That document did not, in our opinion, contain all of the information relevant to the panel's consideration. If we had failed to note our concerns, our silence would have been understood as assent. No implication was intended that ESSA Technologies had been unfair or misleading in its presentation to the panel of the WOE report. To reiterate, our basic concern was, and remains, the sufficiency of the report itself. Where we are unable to resolve issues within the PATH group, we believe that it is important to identify the nature of the disagreement, and let each side fully state their position.

To this end, I stated in my IT comments that we plan on working to provide additional information regarding alternative hypotheses. I also noted a concern that the hypotheses that have been developed in

PATH to date are overly pessimistic for transportation-related hypotheses and overly optimistic for draw-down related hypotheses. I intend to use my best efforts to address these issues within the PATH process, in the same professional manner as we have previously addressed other issues.

I also indicated in my IT comments that the current scope of the analyses and modeling results is limited to a couple of hydro system alternatives and do not include other measures in the future for habitat, hatcheries, harvest, predation controls, or additional hydro system improvements. It is important for public understanding, as well as scientific analysis, to be clear about which alternatives have been explored and which have not. We believe we had a commitment in PATH that other measures would be examined. For the most part, they have not yet been examined.

I had repeatedly expressed concerns through the PATH Planning Group, that due to the severe time constraints and conflicting concurrent tasks, the WOE document was not going to be a complete or adequate synthesis of the information. I attempted to have our concerns included in the presentation to the IT by the facilitator. However, the facilitator declined to include them and took the position that if I had concerns then I should be the one to present them to the IT.

In closing, I would like to note that as the PATH Planning Group Representative for the Operating Agencies, I have a very high level of professional respect for all of the scientists working within PATH. The work being performed by PATH is a very complicated and challenging effort. Significant progress has been made in identifying some of the key uncertainties affecting salmon survival and the effectiveness of mitigation measures. As part of this process, all of us have a responsibility to help ensure that a complete and comprehensive presentation of the science and issues is provided to resource managers and the public. At times, this may mean pointing out problems or concerns with the process. In this instance, I am disappointed that what we believed were legitimate and appropriate expressions of concern about process and content have been misunderstood. Given the intense public interest in this subject, I believe that it is important to all of us to communicate well and carefully.

I would be extremely grateful if you could forward a copy of this letter and the enclosures to anyone who were recipients of the SRP letters.

Sincerely,

James R. Geiselman
Fish & Wildlife Hydro Integration

2 Enclosures

cc:

Dr. Lawrence W. Barnthouse, Scientific Review Panel Coordinator, Oak Ridge, Tennessee
Mr. Dave Marmorek, PATH Facilitator, Vancouver, British Canada

bcc:

A. Smith - E-4

B. Lohn - EW-4

Official File - EW-4 (FW-35)

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Reviewed: _____
Auth/Org/Date Mgr/Org/Date Sec/Org/Date

Enclosure 1 – E-mail letter from Dave Marmorek to SRP Members

From: Dave Marmorek
Sent: Thursday, October 01, 1998 9:18 AM
To: 'Jeremy Collie'; 'Carl Walters'; 'Steve Carpenter'; 'Rick Deriso - IATTC'; 'Randall Peterman'; 'Lou Botsford'
cc: 'Larry Barnthouse'; 'Brian Brown'
Subject: The Weight of Evidence meets the Weight of Politics

Today I presented the results of the WOE workshop to the Implementation Team, plus quite a large crowd of other interested people. The presentation went well; the report has received a lot of attention.

After my presentation, the BPA representative on the PATH Planning Group made some comments, including the comment that the WOE report prepared by ESSA was "unbalanced". I believe it would be valuable for the Implementation Team to have someone else's opinion, and not just mine. I would appreciate it if you each could email a paragraph or so to the Chairman of the Implementation Team, Brian Brown (Brian.Brown@noaa.gov), stating your opinion. Was the WOE report prepared by ESSA a balanced (or unbalanced) synthesis of the evidence available, and (for those of you who attended them) the arguments presented in WOE workshops?

Enclosure 2 - Transcript of Jim Geiselman's comments at the October 1, 1998, IT Meeting from the IT Recorder; Jeff Kuechle:

BPA's Jim Geiselman, a PATH participant and member of the PATH Planning Group, said he and others believe that there is additional information that needs to be provided to the current synthesis of information. There were extremely tight time lines and objections to the process as the development of the Weight of Evidence Report proceeded, he said; we have several concerns about the adequacy of the information that was provided in the report. It was not a consensus report, it was a report by the facilitator based on limited information provided to the facilitator. We objected to the report as an inadequate synthesis of the information, Geiselman said, and we plan on working within the PATH process to provide additional information regarding the alternative hypotheses.

In particular we feel that the high levels of uncertainty in the models and the lack of data for many of the hypotheses are understated, Geiselman said. We are also concerned that the draw-down hypotheses as developed are overly optimistic and the transportation hypotheses are overly pessimistic.

It is also important to note that the updated modeling results do not include any evaluation of the effects of other management actions in the other H's, he continued. That is, there are no harvest, habitat or hatchery management actions, or bird predation programs, included in the analyses. There are also other alternatives that will need to be evaluated for the hydro system. We are very concerned that those additional pieces of information need to be provided in the analyses, said Geiselman. We will have continuing time constraints on how much we can get into the analyses and some of this information will need to be developed after the FY98 report. But I think it is very important to view this need for additional information in context with the weighted modeling results, he said. They show for the survival standards that even with the current hydro system improvements and transportation program you are getting fairly high probabilities of meeting the 24-year and 100-year survival goals, but that the 48-year recovery goal is the problem. The question, then, is how many additional measures either within the hydro system or with other H's you need to implement to get over the 48-year recovery hurdle -- that's an important question we need to address in our continued analyses, said Geiselman.

One of the earlier reviews from the Scientific Review Panel noted that "given the urgency of salmonid management issues that include downriver stocks, coastal stocks, and other species such as steelhead, a total preoccupation with a single life-stage (outmigrating smolts) of the most threatened of the many depleted stocks seems short-sighted. Some thought should be given to how the models should be used to address a wider range of management alternatives than is currently being considered." I would say that it appears that the current limited scope of the analyses in our current report makes that comment very applicable today as well, Geiselman said.