



# COLUMBIA BASIN FISH AND WILDLIFE AUTHORITY

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Coordinating and promoting effective protection and restoration of fish, wildlife, and their habitat in the Columbia River Basin.

The Authority is comprised of the following tribes and fish and wildlife agencies:

Burns Paiute Tribe

Coeur d'Alene Tribe

Confederated Salish and Kootenai Tribes of the Flathead Reservation

Confederated Tribes of the Colville Reservation

Confederated Tribes of the Umatilla Indian Reservation

Confederated Tribes of the Warm Springs Reservation

Confederated Tribes and Bands of the Yakama Nation

Idaho Department of Fish and Game

Kootenai Tribe of Idaho

Montana Department of Fish, Wildlife and Parks

National Marine Fisheries Service

Nez Perce Tribe

Oregon Department of Fish and Wildlife

Shoshone-Bannock Tribes of Fort Hall

Shoshone-Paiute Tribes of Duck Valley

U.S. Fish & Wildlife Service

Washington Department of Fish and Wildlife

**Coordinating Agencies**

Columbia River Inter-Tribal Fish Commission

Upper Columbia United Tribes

February 20, 2007

Patty O'Toole  
Program Implementation Manager  
Fish and Wildlife Division  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, OR 97204

Dear Ms. O'Toole:

The Northwest Power and Conservation Council (Council) initiated a review of the Operations and Maintenance (O&M) costs associated with the wildlife portion of the Northwest Power and Conservation Council's Fish and Wildlife Program. The purpose of the review, as stated in Executive Director Stephen Crow's letter (February 1, 2007) to interested parties, is to determine appropriate operation and maintenance activities and funding levels for land acquired under the wildlife program. The letter included a summary of wildlife project information gathered from the "PISCES" database for review including acreage and cost for each project. Specifically the letter stated that the Council is seeking comment on the use of the project budget information in PISCES for the Council's review of operations and maintenance activities.

The Council has asked the Independent Economic Advisory Board (IEAB) to help the Council with the review (*IEAB Task #116 Investigation of Wildlife O&M Costs*). As stated in Mr. Crow's letter, the Council is asking the IEAB whether the PISCES data can assist the Council's review of the cost-effectiveness of the various operations and maintenance activities, and determine if similar activities can be standardized. The February letter requested the assistance of commenters to determine what data and analysis methods would be most helpful in making judgments about wildlife land operations and maintenance costs, and the role PISCES in future analyses of these costs. The Council is also soliciting recommendations for improving the PISCES data in the future.

The Members of the Columbia Basin Fish and Wildlife Authority (CBFWA) are very interested in assuring implementation of a cost-effective wildlife program including O&M. Individual Members will be providing comments in response to Mr. Crow's letter including providing project specific information, and corrections or clarification to the PISCES data included in his letter. I will not be commenting on any individual projects but I will direct my comments more towards working with the IEAB to complete *Task #116*.

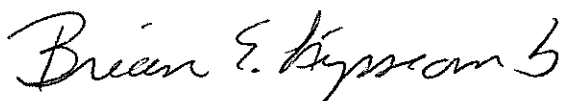
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The Council met with the Bonneville Power Administration to develop a work plan to review wildlife O&M costs on December 4, 2006 and subsequently an assignment for the IEAB was drafted. The Members of CBFWA expressed concern that the review appeared to be proceeding without input from the Fish and Wildlife Managers. During the same time, the Upper Columbia United Tribes (UCUT) were scheduled to provide to the Council's Fish and Wildlife Committee an overview of Wildlife O&M at their December 2006 meeting. CBFWA, working with the UCUT, requested that all the Fish and Wildlife Managers be included in the wildlife O&M discussions. The Council delayed finalizing the IEAB Task Order until input from CBFWA and the Fish and Wildlife Managers could be provided.

The CBFWA Wildlife Advisory Committee (WAC) prepared a white paper for the IEAB, "*A Discussion of Factors Affecting Operations and Maintenance Costs Associated with Wildlife Mitigation Projects Implemented Under the Northwest Power Planning and Conservation Act of 1980*" ([http://www.cbfwa.org/Committees/WAC/meetings/2007\\_0111/OMwhitePaperPopeScheelerJan2007.pdf](http://www.cbfwa.org/Committees/WAC/meetings/2007_0111/OMwhitePaperPopeScheelerJan2007.pdf)). The white paper and *Task #116* were discussed at the January 11, 2007 WAC meeting. Roger Mann (IEAB) participated in those discussions via teleconference. During the discussions the WAC provided further explanation of material in the white paper highlighting concerns with *Task #116* including the use of PISCES data for the review, reasons for cost variation of O&M, and problems with standardizing O&M costs across the Basin. The discussions were productive and provided a good start for more comprehensive interactions between the IEAB and the WAC. The WAC offered to assist IEAB and suggested that the scope of work for the Task Order include the exploration of the cost effectiveness of the entire wildlife program. A subcommittee of the WAC was formed to work on the project with IEAB.

The WAC subcommittee prepared a presentation on wildlife O&M for the January 17, 2007 Council meeting. The Council approved IEAB *Task #116* with the participation of the Fish and Wildlife Managers. The Fish and Wildlife Managers will begin working with IEAB at the February 22, 2007 WAC meeting. We appreciate the Council's willingness to work with the Fish and Wildlife Managers on review of wildlife O&M. The Fish and Wildlife Managers have the critical knowledge and experience to assist the IEAB in a credible and productive analysis of O&M. We look forward to working with the IEAB on *Task Order #116* and the Council to further refine and implement an efficient and cost effective program that mitigates for wildlife losses due to the construction and operation of the power system.

Sincerely,



Brian Lipscomb, Executive Director  
Columbia Basin Fish and Wildlife Authority

cc: NPCC Members  
CBFWA Members