

**Coles, Kendra**

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**Subject:** FW: Wildlife O&M comment request 1Feb 07 letter

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**From:** Ray Entz [mailto:rentz@knrd.org]  
**Sent:** Wednesday, February 07, 2007 11:11 AM  
**To:** O'Toole, Patty  
**Cc:** Deane Osterman; Roger Mann  
**Subject:** Wildlife O&M comment request 1Feb 07 letter

Dear Patty,

In regard to the 1 February 2007 NPCC letter inviting our review and comment on the BPA wildlife O&M summary data from PISCES, we would like to comment on this information and its use for analyzing sponsor costs and efficiencies. First, we need to point out that the acreage totals for the Kalispel Tribe's projects are incorrect. We feel that these numbers are an important part of this review and need to be verified (1991-060-00 = 600 acres and 1992-061-00 KT = 2,995 acres). Additionally, we have several thoughts regarding PISCES and its use in this review and into the future.

One such issue revolves around the set of assumptions BPA staff used in categorizing management costs and why certain costs were lump entirely into the O&M totals for their comparisons. I am convinced that the total dollar figures represented as O&M are still higher than actual. Additional vetting of this data and the underlying assumptions need to be better understood before any review will be completely useful.

We think that any recommended changes to PISCES that would increase the amount of time spent in developing and letting contracts would be unwise and an additional drain on the Program's budget. Currently a considerable amount of time and effort are spent in developing scopes of work and budgets for individual contracts. Additional layers of complexity will only increase project level spending in order to meet those needs. To that end, the Kalispel Tribe feels very strongly that the information provided by PISCES for this review is adequate in terms of generalizing costs in comparisons at the Program level.

I do not feel that PISCES could ever be used to derive information capable of a detailed project by project level assessment. The amount of time and energy investment would not be a wise use of sponsor time. However, the information currently provided does lend itself to being able to visualize budgeted differences, which necessarily need to be explained by the project sponsors and their respective agencies. The Kalispel Tribe does put a significant amount of thought and effort into Work Element cost estimates so they do reflect a real estimate of costs at a task or work element level. They do not represent actual costs to do the work as implementation is dynamic and fluid in respect to the work element budgeting as opposed to the line item budgeting exercise.

One fear is that sponsors may be asked to develop detailed line item budgeting for each work element. This would make those estimates very real and tight, but would probably increase overall contract costs as flexibility between work element budgeting would be lost to rigorous planning and show an overall increase in project need. In addition a system based upon that type of budgeting would be lost at the accounting level as there is no way to track all the time and expenditures by task at our Tribe. The administrative costs to do this would be enormous.

All-in-all, I believe the IEAB, NPCC and BPA can be well served by the information provided by PISCES in this effort to analyze O&M costs as long as it is not used out of context. I do not think it is definitive, but adequate to provide for comparison and recommendations for the future.

Please be aware that I am available to you and the NPCC for the entirety of this review exercise and can assist as necessary.

Best regards,

Ray D. Entz  
Wildlife Program Manager

2/28/2007

Kalispel Tribe of Indians  
Natural Resources Department