

DEPARTMENT OF FISH AND WILDLIFE

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To: Tony Grover **From**: Amy Windrope

RE: NPCC Proposed Cost – Cutting Methodology

Date: June 26, 2015

Dear Tony,

We are pleased to comment on the proposed cost cutting methodology presented at the June 2015 Council Meeting in Coeur D'Alene, Idaho. The Washington Department of Fish and Wildlife (WDFW) is a key implementer of the Northwest Power and Conservation Council's (NPCC) 2014 Fish and Wildlife Program (Program). We receive funding from the Bonneville Power Administration (BPA) for a host of Council priorities: habitat restoration, wildlife mitigation, fish screening operations, hatcheries, natural population research, and monitoring and evaluation.

WDFW supports the emerging priorities listed in the 2014 Program and we are eager to work with the Council and BPA to find funding to advance implementation of these underfunded needs. The methodology provides sound principles for guiding this effort. In particular, WDFW supports looking for funding in an equitable fashion without unduly burdening projects that fall outside of the BiOp or Fish Accords. We also support looking for savings from projects that are closing out, where efficiencies can be found, where key information is not attained, where public benefits are not realized, or where the benefits to the resource are low.

The goal of finding 1% for new priorities is a good starting place and could potentially be ramped up over the coming years. We agree with BPA that finding funds in the FY 16 budgets would be challenging as project sponsors have just had their budgets approved with current funding levels. We have also seen in the months since Program approval, significant steps by BPA to implement the first priority – provide funding for long term maintenance of assets despite there not being new money. BPA has undertaken an inventory of fish screens and hatcheries which we hope will lead to a transparent asset management strategy. We know that the next steps in that process will be expensive thus we are very interested in discussing how to find funding.

Unfortunately, we believe the proposed process creates a large administrative burden with a low probability of achieving the goal – namely to find funds for new priorities. Individual projects currently undergo intense scrutiny during project selection and implementation and there is probably little to achieve in the near-term through this current effort. When projects are reviewed and recommended for funding by NPCC, the measures they are based on have already been reviewed for cost effectiveness and nexus to the FCRPS so using that as criteria for reducing funding is not likely to yield results.

If this effort is truly focused on those projects that are "closing out," then a quarterly review is too often as project close outs are not common and do not align well with a frequent review schedule. In addition, the working group is too narrow given the breadth of specific projects and project outcomes they will be asked to review.

We agree with the intent of the methodology and would be happy to work with Council Members, Council staff and other project sponsors to find an approach that would result in new funds with a lower administrative burden and a greater chance of finding funding for emerging priorities.