



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

February 23, 2007

Ms. Patty O'Toole
Program Implementation Manager
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204

Dear Ms. O'Toole:

Thank you for the opportunity to provide comments on the utility of the project budget information in the PISCES database that may be included in the comprehensive wildlife land operations and maintenance (O&M) review that the Northwest Power and Conservation Council (Council) is currently undertaking.

The Washington Department of Fish and Wildlife (WDFW) is a member of the Columbia Basin Fish and Wildlife Authority (CBFWA) and participated in the development of the CBFWA Wildlife Advisory Committee presentation to the Council on January 17, 2007. I would like to refer you to the points raised in that presentation because it captured the Fish and Wildlife Managers' concerns about the complexity involved in the Council's wildlife O&M analysis, including the utility of the PISCES database. I would also like to draw your attention to a recent CBFWA white paper titled, "A Discussion of Factors Affecting Wildlife Operations and Maintenance Costs Associated with Wildlife Mitigation Projects Implemented Under the Northwest Power Planning and Conservation Act of 1980" which is available from the CBFWA website.

In addition to the presentation and white paper, I would also like to provide some specific comments on the PISCES analysis. Most importantly, the PISCES data does not incorporate and analyze a funding level that is needed to maintain the credited Habitat Units (HUs) over time for each project. Instead, the analysis incorporates a single funding value for each project that is based on a contract awarded by BPA—and does not reflect the funding necessary to protect and/or maintain functional target habitats and associated HUs. This problem is not resolved by simply replacing project HU values for project acres into the analysis and then reporting the O&M cost per HU. The problem is that the adequate funding level to maintain the HUs for each project was never determined in the first place.

It is probably more useful to compare multiple years of data to capture some of the inter-annual variation in O&M expenditures. Otherwise, there is a potential to negatively bias the results if the project year that was included in the analysis was significantly under-spent due to an

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unforeseen circumstance (for instance, if there was a vacancy in a biologist position or if weather conditions precluded work accomplishments).

In Mr. Crow's February 1, 2007, letter inviting comments, he requested information about the accuracy of wildlife project acreage information in the table. I had provided BPA the correct acreage values for the WDFW wildlife area projects in January 2007 and I see that information has been updated in the table that accompanied the letter.

Again, thank you for the opportunity to provide comments. WDFW appreciates that the Council has requested the Fish and Wildlife Managers' involvement with the Independent Economic Advisory Board (IEAB) review of wildlife O&M (Task Order 116) and we look forward to working with the IEAB and the Council as the review continues.

Sincerely,



Nathan Pamplin, Wildlife Policy Coordinator
Intergovernmental Resource Management

cc: Phil Anderson
Dave Brittell
Bill Tweit
Paul Dahmer
Tom Karier
Larry Cassidy
Tony Grover
Stacy Horton
Brian Lipscomb