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June 15, 2005

Mr. Richard W. Stone, Wildlife Policy Lead
Washington Department of Fish and Wildlife
600 Capitol Way N.
Olympia, WA 98501-1091

Dear ~~Mr. Stone~~ Dick:

Thank you for your letter dated May 19, 2005, in which you offered comments on the UCUT proposal for allocating BPA Fish and Wildlife Program funds.

Your comment that the UCUT proposal incorporates shared goals is correct. The UCUT proposal places an emphasis on allocating funds to projects that reflect best science, biologically-based outcomes, long-term benefits, and historical success. Examples include the many individual projects managed by UCUT member Tribes. The UCUT proposal does not propose anything that is antithetical to goals and justifications that have been imbedded in the Council's Program for many years. Nor does it propose to fund any projects that are not biologically sound or without merit, or that are not attributable to impacts of the FCRPS.

All the points you made about the proposal were ones that were considered by UCUT Senior Managers when this proposal was compiled. We know that there are shortcomings in the proposal, which is why it was submitted as a draft. UCUT has asked repeatedly for other managers to submit their own ideas for an allocation approach, so that, collectively, we might integrate a suite of creative approaches into a consensus strategy for allocation.

The UCUT member Tribes deliberately chose not to make trial runs of the proposed approach on any other subbasins because we did not presume to have sufficient information about other subbasins' plans, measures, and estimated costs. We have, however, encouraged managers in other subbasins to apply our approach in their own management areas to test the outcomes. (Trial runs were suggested by UCUT in many CBFWA venues, including MMG, Decision Framework workgroup, and Rate Case Costs workgroup.) Thus far, we have not seen the results of any other managers testing our approach.

You indicate that your state Director cannot support a mechanistic approach, and that you feel a formulaic approach negates the value of subbasin planning. An allocation formula, or any allocation mechanism, would be unnecessary if there were sufficient funding available to fully implement all subbasin plans. It is because funds are insufficient that CBFWA staff and members invested time, effort and travel expenses in an ad hoc workgroup effort to address allocation. The Decision Framework workgroup strategy adopts a mechanical formula by compartment, and results in sustaining more funding for endangered salmon and downriver habitat. The UCUT preferred formula is by geographic region, with consideration of FCRPS impacts and benefits, and results in more funding for upriver habitats in the salmon headwaters, where UCUT members also emphasize resident fish and wildlife restoration.

Perhaps the UCUT rationale for allocation will be deemed suitable only to the unique circumstances of the Upper Columbia Ecoregion. If that is the case, we welcome creative thinking about treating this region separately, as opposed to maintaining a "one size fits all" approach that perpetuates stagnant funding for the geographic headwaters.

Our proposal should easily meet your Director's desire to focus attention on "where the biological need is greater, where we are likely to be most successful, and where we can be most cost-effective." Washington and Idaho staff also should be comfortable with the inclusive style of the Upper Columbia United Tribes in any project review committees. Tribal-State collaboration in developing subbasin plans was very productive, and the Inter Mountain Province Oversight Committee (which included Washington and Idaho representation) endorsed the same 10-year implementation strategy proposed by UCUT for that Province.

Again, we thank you for taking the time to submit your comments and questions to us. It is unfortunate that these queries were not raised for reasonable dialogue in one of the numerous meetings over the past 8 or 9 months in which UCUT member Tribes were personally represented. Nonetheless, we continue to welcome open-minded discussion and constructive criticism. UCUT member representatives will attend the June 28 MMG in Portland. There we will make clear the JCCA hydro allocation and the proposed flexible allocation formulae, and answer the other questions raised in your letter.

Sincerely,

Mary Verner
Executive Director

cc.: UCUT Member Tribes
CBFWA Members