



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**

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May 19, 2005

Mary Verner  
Upper Columbia United Tribes  
910 N. Washington Suite 107  
Spokane, WA 99201

Dear Ms Verner, *Mary*

At a recent Decision Framework meeting you requested a response and review of the UCUT proposal for allocating the Fish and Wildlife Program funds. Like many, I probably have been somewhat reluctant to take on this task. Given the sensitive state of relations within CBFWA we have all been walking somewhat lightly. However, your request is reasonable and we owe you the courtesy of a response. I offer these comments in the spirit of constructive criticism and hope you will find them useful.

I very much appreciate the initiative that the UCUT tribes took in generating this proposal. Sometimes it is important that someone step up and put some ideas down on paper in order to move the process along. That sort of approach has some risks, and I appreciate your willingness to take them.

There are many areas of the proposal that we can find agreement on. In particular, the proposal puts emphasis on some shared goals in section 4. The allocation process should reflect best science, biologically based outcomes, long-term benefits, and historical success.

In my review I came across several issues that I think need further scrutiny as your prepare to present this proposal to others:

- 1) Multiple allocations of the same funds – in the examples provided it appears that the same \$127 million is allocated multiple times. For example for the Intermountain Province a base funding proposal of 6/62<sup>nd</sup> of \$127 million is proposed (1/62 for each subbasin). If this approach is applied to each of the subbasins in the region than 100% of the \$127 million is allocated.

However, the proposal goes on to allocate additional funds to each of the example basins. For example, in the Intermountain Province 6/62<sup>nd</sup> of the 15% of the total funding allocated to each of wildlife and resident fish is allocated. This same approach could be applied to every subbasin resulting in a complete allocation of 30% of the \$127 million or \$38.1 million. In the Okanogan subbasin an additional 1.5 x 1/38<sup>th</sup> of the funds is allocated for ESA Compliance for salmon. If this is applied to every subbasin with ESA concerns

(Wenatchee, Methow, Entiat, various tribes of the Snake) an additional sizeable amount is allocated. Next a JCCA Hydro allocation is applied. As described in item 5 below it is not clear how the JCCA values were derived or their meaning, but the end result is a substantial additional allocation of funds. It is difficult to determine the exact impact of the JCCA additions, but it seems clear that if they were applied uniformly to all the subbasins these add-ons could result in allocating as much as \$127 million more.

In some discussions with Ron Peters he suggested that there could be offsetting downward adjustments in some subbasins. However there are no examples provided, and it is not clear what these might be. The end result is that if this approach is applied as a regional allocation scheme the funds are allocated more than once, likely more than twice, and maybe as much as three times.

- 2) Failure to include mainstem and program costs – as noted in Section 9 of the UCUT proposal no accommodation is made for any mainstem and system wide activities, including decision support, coordination, M&E, research, and other activities. It appears that all of the available funds would be allocated to the various subbasins. These mainstem and program costs are critical components of the program that need funding if the region is to be successful.
- 3) Formulaic approach – one of the challenges to the proposed approach is the formulaic nature of the analysis. In many ways each subbasin is treated similarly. Should the Palouse subbasin have the same base funding as the Yakima? They are very different sizes, have very different biological needs, and have differing impacts from the hydrosystem. This formulaic approach negates the value of subbasin planning and seems contradictory to the values of best science, biologically based outcomes, long-term benefits, and historical success described in the UCUT proposal. My Director is very much opposed to mechanistic approaches to setting priorities and funding allocations. He strongly feels that we need to focus our attention on where the biological need is greater, where we are likely to be most successful, and where we can be most cost-effective. I also believe that the other players in the region will have a hard time with the UCUT approach.
- 4) Decision making structure – in item 5d the UCUT proposal suggests that provincial review committees will be established to prioritize projects and make recommendations for funding etc. For the Upper Columbia Ecoregion it is proposed that the UCUT tribes be the review committee. You can imagine the challenge this suggestion provides to the states of Idaho and Washington. I do not know if your intention was to exclude these two key players from any decision making role, but it is difficult to see how the system can work if they are.
- 5) Lack of explanation for some elements – there are a few of the key elements of the proposal that are difficult to decipher. In particular I was not able to decipher the use of the JCCA criteria. There needs to be more detail on the purpose and reason for using this adjustment and why and how it changes from one area to another. In my brief discussions with BPA staff, council staff, and CBFWA members it appears that others are having the same difficulty.

Mary Verner  
May 19, 2005  
Page 3

- 6) These are just UCUT allocations – in section 9 it is suggested that this proposal is for UCUT needs only and that other's needs are not included. There are several problems with this approach. First, for an allocation scheme to be useful it must be applicable to the broader basin, particularly when it is based on relatively mechanistic criteria. These same criteria can, and likely will, be tested by various parties in the basin on other subbasins and provinces. If it doesn't result in useful outcomes for the entire basin it is likely to be rejected. Second, if the allocation is to be for a province it needs to be for all of the players in a province, not just a portion of them. If the proposed criteria are based on the history, impact, and condition of a particular area it impacts all of the players not just part of them.

As I understand it the UCUTs are going to be presenting this proposal at an upcoming MMG meeting. I hope you will find these comments useful while developing the presentation. If you have questions, or if I have missed something critical to my understanding of the proposal please contact me at (360) 902-2693 or [stonerws@dfw.wa.gov](mailto:stonerws@dfw.wa.gov). I would be happy to discuss this in more detail.

Sincerely,



Richard W. Stone  
Wildlife Policy Lead

cc CBFWA Decision Framework Committee