

# COLUMBIA BASIN FISH AND WILDLIFE AUTHORITY

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October 6, 2006

Mark Walker  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, OR 97204

Dear Mr. Walker:

The Members of the Columbia Basin Fish and Wildlife Authority (CBFWA) would like to provide comments on the Northwest Power and Conservation Council's (Council) draft recommendations for Fiscal Year (FY) 2007-2009 funding for the Fish and Wildlife Program (Program). We commend the Council for providing a wide variety of entities and interests the opportunity to participate in these discussions and for meaningful input into the Council's decision-making process. In the 25 years since the passage of the Northwest Power Act (Act), many of these entities and interests have never had the quantity and quality of input and participation in Council decision-making as they were provided over the past several months. However, the CBFWA members are concerned that the Council may not be adequately implementing the Program as envisioned in the Act.

The CBFWA members are concerned that there has been inadequate time to prepare comprehensive comments on a process of this significance. The Council's draft recommendations represent annual spending of nearly \$143 million for the next three years and less than three weeks time was allowed for coordinated comment. To make this task more difficult, the basis of many of the decisions reflected in the draft recommendations is unclear and undocumented, and many decisions are inconsistent with or contrary to priorities of the fish and wildlife managers and/or of the groups asked by the Council to evaluate proposals within specific geographic or topic areas. In fact, in many of their specific comments on projects in the Basinwide category the Council defers to the project sponsors to prioritize their own work by stating "Ask sponsor to confirm during comment period what work can be completed at this budget level." The CBFWA members are unable to comment on projects whose priorities are undefined.

The CBFWA members are concerned that the FY 2007-2009 funding level was set arbitrarily by Bonneville Power Administration (BPA) in their rate setting process and did not take into consideration the true cost of adequately implementing the Program as envisioned in the Act. The poor status of Columbia River fish and wildlife resources demands immediate attention. The Act calls for "a Program to protect, mitigate, and enhance fish and wildlife, including related spawning grounds and habitat, on the Columbia River and its tributaries." The current Program is failing by most accounts (e.g., the Council's Program set goals to - reverse the decline of anadromous fish populations by 2005 and to increase runs to 5 million by 2025, restore native resident fish abundance to near historic levels, protect and expand habitat and ecosystem function, and to monitor and evaluate habitat and species responses to wildlife mitigation actions). At the current level of funding the region will be unable to effectively implement the subbasin plan portion of the Program as envisioned and composed by the local subbasin planners. Inadequate funding of the implementation of the Fish and Wildlife Program's

Coordinating and promoting effective protection and restoration of fish, wildlife, and their habitat in the Columbia River Basin.

The Authority is comprised of the following tribes and government agencies:

Burns Paiute Tribe

Coeur d'Alene Tribe

Confederated Salish and Kootenai Tribes of the Flathead Reservation

Confederated Tribes of the Umatilla Indian Reservation

Confederated Tribes of the Warm Springs Reservation

Confederated Tribes and Bands of the Yakama Nation

Idaho Department of Fish and Game

Kootenai Tribe of Idaho

Montana Department of Fish, Wildlife and Parks

National Marine Fisheries Service

Nez Perce Tribe

Oregon Department of Fish and Wildlife

Shoshone-Bannock Tribes of Fort Hall

Shoshone-Paiute Tribes of Duck Valley

U.S. Fish & Wildlife Service

Washington Department of Fish and Wildlife

Coordinating Agencies

Columbia River Inter-Tribal Fish Commission

Upper Columbia United Tribes

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subbasin plans undermines the ability to achieve the Program's goals. Equally important, stakeholder relationships are at risk due to competition for inadequate funds.

The CBFWA members call on the Council to initiate a comprehensive evaluation of the true cost of implementing the Program at a level that will achieve the region's goals. The subbasin plans can provide the foundation for developing the true cost estimate to meet the requirements of the Act. The fish and wildlife managers are prepared to engage the Council in this discussion. It is now clear to us that the funding level established by BPA is insufficient to fully implement the subbasin plans adopted into the Program. It is also apparent that there will be additional needs, on top of the current funding, to fully meet BPA's obligations under the biological opinion remand process. The CBFWA members also support an innovative funding category, but agree that in the current funding scenario, additional funds should be provided to support it.

According to the original solicitation documents, the Council identified several local and regional entities and groups to review fish and wildlife projects submitted to the Council for funding and to develop balanced budgets to meet the highest priority management objectives according to predetermined province level funding allocations. Subsequently, the province level groups reviewed the projects and balanced the Council's Program for FY 2007-2009 consistent with subbasin plans and the Council's guidance documents on research, monitoring and evaluation. The CBFWA members believe that the Council has significantly deviated from the province level recommendations, particularly in the Basinwide category, and may have deviated significantly from their own Program. In addition, the Council has not identified how the current project recommendations meet the 70:15:15 allocations between anadromous fish, resident fish, and wildlife projects. This was a major funding principle for the 2007-2009 solicitation. The Council should provide this analysis with their final recommendations.

The CBFWA Members were generally satisfied with the prioritization work that was completed at the province level. The primary conflicts arose due to the competition for inadequate funds resulting in the discontinuation of ongoing core work to fund new projects. Several projects that are essential and of high priority to the management of fish populations negatively affected by the federal hydro-power system were either significantly compromised by reductions in funding or were eliminated. Table 1 provides a list of projects that exemplify essential projects or tasks that will be lost according to the current Council draft recommendation. The result is a significant weakening of our ability to manage, conserve and enhance these resources. The CBFWA members encourage the Council to fully consider the recommendations of the province level review groups and to seek additional funding from BPA to fully implement the Program.

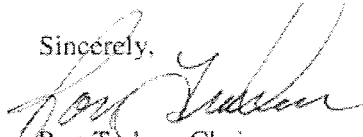
The CBFWA members are concerned that the Council has created several placeholders in their draft recommendation. Essential projects (as identified in Table 1) must not be foregone in order to fund yet-to-be determined proposals to be solicited in an undefined process. Until the Council has completed an overall cost review of the Program, the CBFWA members do not support withholding money from existing essential projects to support undefined alternatives. In the final project recommendations from Council, the CBFWA members would appreciate an explicit statement of purpose and process designated for any placeholders that are held in reserve.

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CBFWA recommends fully allocating the available expense budget, working with BPA to estimate and make available unspent dollars from FY 2006 and earlier years, and working with BPA to aggressively identify opportunities to capitalize costs currently defined as expenses. Toward this end, the Council should immediately schedule a meeting with the fish and wildlife managers to go through the draft list of recommended projects and work together to correct critical omissions and errors in funding levels. The biological consequences of not fully funding the subbasin plans are avoidable if the Council commits to working more closely with the fish and wildlife managers to define critical needs and priorities and better use available dollars to fund projects that meet those needs.

If you have questions regarding these comments, please contact Brian Lipscomb at (503) 229-0191.

Sincerely,



Ron Trahan, Chair  
Columbia Basin Fish and Wildlife Authority

Enclosure

cc: CBFWA Members  
NPCC Members  
Greg Delwiche, BPA  
Glen Nenema, KT  
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Rick Sherwood, STI  
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