



**Department of Energy**  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

May 30, 2001

In reply refer to: KEW-4

Mr. Frank L. (Larry) Cassidy  
Chairman, Northwest Power Planning Council  
851 Sixth Avenue, Suite 1100  
Portland, OR 97204-1348

Dear Mr. Cassidy:

I am pleased to provide you with Bonneville's analysis of the proposals received for the Fiscal Year 2002 Project Proposals for the Mountain Columbia Province. Our analysis (Enclosure 1) is based upon a review of the original project proposals, the Columbia Basin Fish and Wildlife Authority (CBFWA) and the Independent Scientific Review Panel's (ISRP) final review of the project proposals.

The criteria we used to review the projects were:

- Are budgets (O&M, M&E, Carry Forward/Carry Over Issues, Overall) for the work realistic as gauged by our experience with similar projects?
- Are there any performance issues with ongoing projects?
- Completeness of work items, or does the proposal have the proper scope as compared with its overall objectives?
- Is there an identified or possible linkage to the U.S. Fish and Wildlife Service's Biological Opinion Reasonable and Prudent Alternative's (RPA's)?
- Is there any duplication of work between projects?
- Does the proposal describe how the work will complement similar work in other ongoing projects?
- Can the project spend the funds they are asking for, i.e. is their rate of implementation realistic?

We appreciate the opportunity to review these projects, and the level of analysis provided by the ISRP and the CBFWA. We have also enclosed a document outlining our eight categories of funding recommendations:

**Category 1 - Fund** – ESA BiOp Projects that meet both the needs of the Council Fish and Wildlife program and the ESA requirements of the US Fish and Wildlife Services Biological Opinion for operation of the Upper Columbia FCRPS dams and should be fully funded with qualifications as needed.

**Category 2 - Fund** – Ongoing Projects, which should be fully funded.

**Category 3 - Fund In Part or with Qualifications**– Ongoing projects that should be funded with the stated qualifications.

**Category 4 - Fund In Part** – New, includes two projects, which are a combination of ongoing projects and new projects designed for wildlife mitigation. The existing portions of these projects should be funded, but the wildlife mitigation objectives should not be funded for the reasons discussed later in this cover letter.

**Category 5 - Potential Funding After Completion of Subbasin Planning** – No Comments/Qualifications, lists projects that should be reconsidered for funding after subbasin planning is completed as discussed in our cover letter. We have no comments in addition to those provided by ISRP/CBFWA.

**Category 6 - Potential Funding After Completion of Subbasin Planning** – With Comments/Qualifications, lists projects that should be reconsidered for funding after subbasin planning is completed as discussed later in this letter.

**Category 7 - Do Not Fund** – Ongoing, lists projects that should not be funded to continue implementation of the current objectives based on our agreement with the technical review of the ISRP.

**Category 8 - Do Not Fund** – New, lists projects that should not be funded based on our agreement with the ISRP comments on the scientific merit of the projects, or with CBFWA on the timing and need for the project.

A number of proposals in categories 4, 5, 6, and 8 seek BPA support for projects that are designed in whole or in part to mitigate for the habitat impacts resulting from the construction or development of Libby and Hungry Horse Dams. BPA and the State of Montana addressed these impacts in a 1988 memorandum of agreement (MOA), the Wildlife Mitigation Agreement for Libby and Hungry Horse Dams. The purpose of the MOA, as stated in section 1, was "to establish an arrangement that provides for the protection, mitigation, and enhancement of wildlife and wildlife habitat affected by the development of Libby and Hungry Horse Dams. . . ." Section 2 of the MOA defined development as "the construction of Libby and Hungry Horse Dams, reservoirs, and associated facilities." Under sections 12(a) and (b) of the MOA, Montana agreed to be responsible for full mitigation at a one-to-one replacement value. In a letter from Governor Stan Stephens to Administrator Jim Jura regarding interpretation of the MOA (dated September 21, 1990), "full mitigation under the MOA was to replace 100 percent of the lost habitat identified in loss assessments with an amount of habitat, which has an equivalent biological carrying capacity."

The MOA satisfied all of BPA's responsibilities for the protection, mitigation, and enhancement of wildlife and wildlife habitat affected by the two dams. In addition, section 12(c) of the MOA prohibited Montana from seeking "directly or indirectly to recommend to the Council . . . or support the recommendations or claims of others, and not to make any other claims that BPA should pay additional moneys for . . . wildlife and wildlife habitat affected by the development of Libby and Hungry Horse Dams. . . ." The MOA did not cover other entities or other impacts

that warrant additional consideration here. BPA and the State of Montana were the only parties to the MOA. Other entities such as the Salish Kootenai Tribes are not bound by the terms of the agreement. Consequently, any entity other than Montana may seek further funding from BPA for measures that mitigate the construction or developmental impacts of Libby and Hungry Horse Dams. BPA, however, has no obligation to fund those measures because it discharged its full legal responsibility for wildlife mitigation for those dams with the MOA.

Another issue left unresolved with the MOA is BPA's outstanding duty to address operational impacts. The Council's 2000 program amendments indicate that operational losses should be addressed through subbasin assessment and planning. BPA agrees with this statement. Mitigation actions done as part of subbasin planning, combined with actions BPA will take under the National Marine Fisheries Service 2000 FCRPS biological opinion, will include additional habitat acquisitions and improvements throughout the Basin. Through the course of the next decade, BPA anticipates considerable amounts of habitat to be protected and enhanced through these related efforts. BPA believes the new subbasin mitigation actions will fully mitigate for the operational impacts of the FCRPS. Therefore, projects submitted in the Mountain Columbia Provincial Review that address operational impacts on wildlife should be considered, to the extent possible, in the context of the subbasin planning process. I should note, however, that BPA does not recognize an obligation to mitigate for secondary losses, which the program addresses in the same section as operational losses.

Finally, the MOA focused on wildlife only. Therefore, as projects are proposed to address fish habitat issues, BPA will consider them outside the parameters set in the MOA. Thank you for this opportunity to comment on these projects and we are looking forward to working with the Council as they move forward with the final review and funding recommendation for the FY2002 Mountain Columbia projects.

Sincerely,

Robert J. Austin  
Deputy Director for Fish and Wildlife

Enclosures

cc:

Dr. Brian Allee, Columbia Basin Fish and Wildlife Authority



## Mountain Columbia Province Funding

Project Number	Title	Sponsor	Subbasin	ISRP Funding Recommendation	BPA Funding Recommendation	FY02 Request	3 Year Funding Estimates	Notes
<b>1. Fund – ESA BiOp Projects</b>								
24001	Lake Pend Oreille Predation Research	Idaho Fish and Game	Pend Oreille Upper	Move to fundable versus recommended action	Agree, plus meets BiOp requirement	\$141,000.00	\$444,000.00	
24009	Assess Feasibility of Enhancing White Sturgeon Spawning Substrate Habitat, Kootenai R., Idaho	Kootenai Tribe of Idaho	Kootenai	Fundable	Agree, plus meets BiOp requirement	\$350,000.00	\$1,510,000.00	CBFWA recommends \$510,000 for 3 year estimate
24010	Reconnection of floodplain slough habitat to the Kootenai River	Kootenai Tribe of Idaho	Kootenai	Fundable - Elevate to High Priority	Agree, plus meets BiOp requirement	\$139,974.00	\$719,974.00	
24021	Implement Floodplain Operational Loss Assessment, Protection, Mitigation and Rehabilitation on the Lower Kootenai River Watershed Ecosystem	Kootenai Tribe of Idaho		Fundable/High Priority	Agree, plus meets BiOp requirement	\$192,864.00	\$968,864.00	
198806400	Kootenai River White Sturgeon Studies and Conservation Aquaculture	Kootenai Tribe of Idaho	Kootenai	Fundable/High Priority	Agree fundable , plus meets BiOp requirement	\$1,230,000.00	\$5,833,00	
199101903	Hungry Horse Mitigation	Montana Fish, Wildlife & Parks	Flathead	Fundable/High Priority	Agree, plus will be modified to meets BiOp requirements	\$982,850.00	\$3,037,850.00	
199404700	Lake Pend Oreille Fishery Recovery Project	Idaho Department of Fish and Game	Pend Oreille Upper	Fundable/High Priority	Agree fundable, plus meets BiOp requirements	\$362,000.00	\$1,100,000.00	
199500400	Mitigation For The Construction And Operation Of Libby Dam	Montana Department of Fish, Wildlife and Parks	Kootenai	Fundable/High Priority	Agree, plus will be modified to meets BiOp requirements	\$805,000.00	\$2,505,000.00	
					<b>Total</b>	\$4,203,688.00	\$10,285,688.00	
<b>2. Fund – Ongoing Projects</b>								
198806500	Kootenai River Fisheries Recovery Investigations	Idaho Department of Fish and Game	Kootenai	Fundable	Agree, fundable	\$825,391.00	\$2,834,892.00	
199101904	Stocking of offsite waters for Hungry Horse Mitigation - Creston National Fish Hatchery	U.S. Fish and Wildlife Service	Flathead	Fundable	Agree, fundable	\$106,672.00	\$329,712.00	
199404900	Improving the Kootenai River Ecosystem	Kootenai Tribe of Idaho	Kootenai	Fundable	Agree, fundable	\$710,891.00	\$3,535,891.00	
199700400	Resident Fish Stock Status Above Chief Joseph and Grand Coulee Dams	Kalispel Tribe of Indians	Pend Oreille Lower	Fundable	Agree, fundable	\$518,000.00	\$1,588,00	
					<b>Total</b>	\$2,160,954.00	\$6,700,495.00	
<b>3. Fund In Part or with Qualifications– Ongoing Projects</b>								
199004400	Implement Fisheries Enhancement Opportunities on the Coeur d'Alene Reservation	Coeur d'Alene Tribe	Coeur d'Alene	Fundable with Qualifications	Agree, Fundable with Qualifications	\$1,174,365.00	\$3,540,071.00	

<b>Project Number</b>	<b>Title</b>	<b>Sponsor</b>	<b>Subbasin</b>	<b>ISRP Funding Recommendation</b>	<b>BPA Funding Recommendation</b>	<b>FY02 Request</b>	<b>3 Year Funding Estimates</b>	<b>Notes</b>
199004401	Lake Creek Land Acquisition and Enhancement	Coeur d'Alene Tribe	Coeur d'Alene	Fundable with Qualifications	Fundable with Qualifications	\$1,463,070.00	\$5,030,784.00	
199106000	Pend Oreille Wetlands Wildlife Mitigation Project - Kalispel	Kalispel Tribe of Indians	Pend Oreille Lower	Do Not Fund	Disagree, conditional full funding of O&M if M&E plan developed	\$167,300.00	\$440,450.00	
199206100	Albeni Falls Wildlife Mitigation Project	Albeni Falls Interagency Work Group	Pend Oreille Upper	Do Not Fund	Disagree, conditional full funding of Implementation & O&M if M&E plan developed	\$6,178,795.00	\$19,331,635.00	
199500100	Kalispel Tribe Resident Fish	Kalispel Tribe of Indians	Pend Oreille Lower	Fundable in part	Agree, fundable in part	\$410,000	\$1,319,600.00	
199608720	Focus Watershed Coordination in the Kootenai River Watershed	Montana Department of Fish, Wildlife and Parks	Kootani	Do not fund	Disagree, fundable with qualification	\$101,500.00	\$305,250.00	
200000400	Monitor and protect bull trout for Koocanusa Reservoir.	BC Environment	Kootenai	Fundable	Agree, fundable with qualification	\$62,000.00	\$186,000	
					<b>Total</b>	\$9,147,030.00	\$29,967,790.00	
<b>4. Fund In Part – New</b>								
24018	Secure and Restore Critical Fish and Wildlife Habitats	Confederated Salish and Kootenai Tribes	Flathead	Do Not Fund	Disagree. Fundable in part	\$4,918,444.00	\$13,996,096.00	Fund Objective 4, 199608701, and Objective 5, 19910190. FY02 Total = \$111,402
24019	Research, Monitor, and Restore Native Species	Confederated Salish & Kootenai Tribes	Flathead	Fundable in Part	Agree, fundable in part	\$131,400.00	\$415,400.00	Fund Objectives 1-6, 199101900. Total = \$104,000
					<b>Total</b>	\$5,049,844.00	\$14,411,496.00	
<b>5. Potentially Fundable After Completion of Subbasin Planning – No Comments/Qualifications</b>								
24003	Acquire and conserve high priority bull and westslope cutthroat trout habitat in Trestle Creek.	Idaho Department of Fish and Game	Pend Oreille Upper	Fundable	Agree, fundable after subbasin planning	\$290,400.00	\$290,400.00	
24004	Pend Oreille/Priest Exotic Fish Species Suppression and Native Fish Protection	Idaho Department of Fish and Game	Pend Oreille Upper	Conditional Funding	Agree – fundable in part after subbasin planning	\$448,500.00	\$958,000.00	CBFWA Recommends FY02 = \$418,500; CBFWA Recommends 3 Year = \$928,5000
24005	Smith Creek Restoration	Idaho Department of Fish and Game	Kootenai	Fundable	Agree - fundable after subbasin planning	\$52,680.00	\$358,040.00	
24008	Genetic Inventory of Bull Trout and Westslope Cutthroat Trout in the Pend Oreille Subbasin	Kalispell Tribe of Indians	Pend Oreille Lower	Agree – Fundable	Agree, fundable after subbasin planning	\$243,490.00	\$450,490.00	
24012	Riparian Habitat Preservation - Weaver Slough and McWinegar Slough	Flathead Land Trust	Flathead	Fundable - Elevate to High Priority	Agree, fundable after subbasin planning	\$1,080,000.00	\$1,080,000.00	
24016	Kootenai River Subbasin Stakeholders Symposium	Kootenai River Network	Kootenai	Fundable	Agree, fundable after subbasin planning	\$51,450.00	\$162,197.00	

<b>Project Number</b>	<b>Title</b>	<b>Sponsor</b>	<b>Subbasin</b>	<b>ISRP Funding Recommendation</b>	<b>BPA Funding Recommendation</b>	<b>FY02 Request</b>	<b>3 Year Funding Estimates</b>	<b>Notes</b>
24023	Purchase Conservation Easement from Plum Creek Timber Company (PCT) along Fisher River	Montana Fish, Wildlife & Parks	Kootani	Fundable/High Priority	Agree, fundable with comments after subbasin planning	\$500,000.00	\$1,500,000.00	
					<b>Total</b>	\$2,666,520.00	\$4,799,127.00	
<b>6. Potentially Fundable After Completion of Subbasin Planning – With Comments/Qualifications</b>								
24015	Wetland/Riparian Protection, Restoration, Enhancement and Maintenance in the Coeur d'Alene Subbasin	Coeur d'Alene Tribe	Coeur d'Alene	Fundable	Agree, fundable with comments after subbasin planning	\$1,996,131.00	\$6,535,188.00	
24017	Restoring Bull Trout Habitat in The Blackfoot River's North Fork	Trout Unlimited's Western Water Project	Blackfoot	Fundable	Agree, fundable with comments after subbasin planning	\$329,128.00	\$349,128.00	
24020	Center for GIS Analysis and Information in the Coeur d'Alene Subbasin	Coeur d'Alene Tribe	Coeur d'Alene	Fundable	Agree, fundable with comments after subbasin planning	\$180,700.00	\$563,100.00	
					<b>Total</b>	\$2,505,959.00	\$7,447,416.00	
<b>7. Do Not Fund – Ongoing</b>								
199004402	Coeur d'Alene Tribe Trout Production Facility	Coeur d'Alene Tribe	Coeur d'Alene	Do Not Fund	Agree, do not fund	\$775,496.00	\$2,516,120.00	
					<b>Total</b>	\$775,496.00	\$2,516,120.00	
<b>8. Do Not Fund – New</b>								
24002	Using DNA from bear hair samples to confirm grizzly bear presence in the Lower Pend Oreille Sub-basin.	Washington Department of Fish and Wildlife	Pend Oreille Lower	Do not fund.	Do not fund	\$74,516.00	\$74,516.00	
24006	Pend Oreille Erosion Abatement and Landform Restoration	Idaho Department of Fish and Game	Pend Oreille Upper	Do Not Fund	Agree – Do Not Fund	\$73,000.00	\$115,000.00	
24007	Characterize and Assess Wildlife-Habitat Types and Structural Conditions for Sub-Basins within the Mountain Columbia Ecoprovince	Northwest Habitat Institute	Mountain Columbia	ISRP Fundable vs. CBFWA Do Not Fund	Do Not Fund Agree with CBFWA	\$327,600.00	\$490,140.00	
24013	Assessment of Operational Impacts of Hungry Horse Dam on Riparian Wildlife habitats and their associated aquatic components	Montana Department of Fish, Wildlife and Parks	Flathead	Do not fund.	Agree, do not fund	\$188,949.00	\$498,839.00	
24014	Assessment of Operational Impacts of Libby Dam on Riparian Wildlife habitats and their associated aquatic components	Montana Department of Fish, Wildlife and Parks	Kootenai	Do not fund.	Agree, do not fund	\$188,849.00	\$498,839.00	

<b>Project Number</b>	<b>Title</b>	<b>Sponsor</b>	<b>Subbasin</b>	<b>ISRP Funding Recommendation</b>	<b>BPA Funding Recommendation</b>	<b>FY02 Request</b>	<b>3 Year Funding Estimates</b>	<b>Notes</b>
24025	Pend Oreille Subbasin Native Westslope Cutthroat Population Study	Washington Trout	Pend Oreille Lower	Fundable/ISRP, Do Not Fund/CBFWA	Do Not Fund	\$73,275.00	\$227,875.00	
					<b>Total</b>	\$926,189.00	\$1,905,209.00	



**FY 2002 FUNDING RECOMMENDATIONS FOR  
MOUNTAIN COLUMBIA PROVINCE**

**1. Fund – ESA BiOp Projects**

The following projects meet both the needs of the Council Fish and Wildlife program and the ESA requirements of the US Fish and Wildlife Services Biological Opinion for operation of the Upper Columbia FCRPS dams and should be fully funded with qualifications as needed.

**Project Number 24001 - Lake Pend Oreille Predation Research**

- This project has direct relationship to the BiOp requirements, but also warrants consideration of the points raised by the ISRP concerning the implementation techniques and the connection with proposal 24004.

**Project Number 24009 - Assess Feasibility of Enhancing White Sturgeon Spawning Substrate Habitat, Kootenai River, Idaho**

- Agree with ISRP and CBFWA recommendation to fund and will meet BiOp requirements.

**Project Number 24010 - Reconnection of Floodplain Slough Habitat to the Kootani River**

- Agree with ISRP to fund the feasibility phase of this project and agree with the CBFWA recommendation to fund this in conjunction with 24021 to meet BiOp requirements.

**Project Number 24021 - Implement Floodplain Operational Loss Assessment, Protection, Mitigation and Rehabilitation on the Lower Kootenai River Watershed Ecosystem**

- Agree with ISRP and CBFWA recommendation to fund and will meet BiOp requirements.

**Project Number 198806400 - Kootenai River White Sturgeon Studies and Conservation Aquaculture**

- Agree with the ISRP and CBFWA recommendation to fund and will meet BiOp requirements.

**Project Number 199101903 - Hungry Horse Mitigation**

- This project does not presently meet ESA BiOp requirements, but will require funding under the implementation plan. It is anticipated that this project will be fully developed by December 2001. The original project goals are identified in the "Hungry Horse Mitigation Implementation Plan". Those are the annual numbers given by the ISRP in their review. Those numbers/goals have not changed since 1993. The ISRP was correct in identifying this as an amalgam of many discrete projects. Past performance on individual projects has been satisfactory, but it has been difficult to establish clear linkages between individual projects and the overall mitigation goals. There has been no clear delineation of how each project fits into an overall program, or how construction and operational losses could be separated between the proposed individual projects. This project should only be funded with the stipulation that an overall project management plan be developed in conjunction with a clarification of the project goals and objectives.

**Project Number 199404700 – Lake Pend Oreille Fishery Recovery Project**

- Agree with the ISRP and CBFWA recommendation to fund and will meet BiOp requirements.

**FY 2002 FUNDING RECOMMENDATIONS FOR  
MOUNTAIN COLUMBIA PROVINCE**

**Project Number 199500400 – Mitigation for the Construction and Operation of Libby Dam**

- This project does not presently meet ESA BiOp requirements, but will require funding under the implementation plan. It is anticipated that this project will be fully developed by December 2001. The ISRP was correct in identifying this as an amalgam of many discrete projects. Past performance has been acceptable on individual projects, but as with the Hungry Horse Mitigation project 199101903, it is difficult to measure the overall success of the project without a clear linkage between individual projects and overall mitigation goals and objective. This project has been operating under the draft Libby mitigation plan provided to the Council in 1996. The Council should act to adopt this mitigation plan and require the project sponsor to clarify its goals and objective and timeframes for mitigation success. We also do not understand the current objective for "information transfer". The type of peer review, such as a scientific journal or other publication needs to be clearly stated.

**LIBBY DAM 6TH UNIT** - The FWS biological opinion requests that Libby Dam capacity should be increased by 10 kcfs. A 2001 test of the spillway to determine how much water could be delivered through spill while staying within the 110% Total Dissolved Gas Standard has been delayed for one year due to low water conditions. This project requires funding under the implementation plan and will be fully developed by December 200.

<b>2. Fund – Ongoing Projects</b>
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The following projects should be funded as described. Bonneville has no additional comments on these projects.

<b>Project Number</b>	<b>Title</b>	<b>Sponsor</b>	<b>Subbasin</b>
198806500	Kootenai River Fisheries Recovery Investigations	Idaho Department of Fish and Game	Kootenai
199101904	Stocking of offsite waters for Hungry Horse Mitigation - Creston National Fish Hatchery	U.S. Fish and Wildlife Service	Flathead
199404900	Improving the Kootenai River Ecosystem	Kootenai Tribe of Idaho	Kootenai
199700400	Resident Fish Stock Status Above Chief Joseph and Grand Coulee Dams	Kalispel Tribe of Indians	Pend Oreille Lower

<b>3. Fund In Part or with Qualifications– Ongoing Projects</b>
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The following ongoing projects should be funded with the stated qualifications.

**Project Number 199004400 - Implement Fisheries Enhancement Opportunities on the Coeur d’Alene Reservation**

- Past implementation performance has been successful. We recommend project funding contingent that the sponsor provides an acceptable monitoring and evaluation. The plan must be acceptable to the Council and BPA.

**FY 2002 FUNDING RECOMMENDATIONS FOR  
MOUNTAIN COLUMBIA PROVINCE**

**Project Number 199004401: Lake Creek Land Acquisition and Enhancement**

- We agree with the ISRP recommendation for conditional funding. A set of clear time lines and potential deliverables needs to be established for this project. Past performance to purchase properties was unsuccessful and tied up valuable mitigation funds for over ten years.

**Project Number 199106000 - Pend Oreille Wetlands Wildlife Mitigation Project – Kalispel**

- Disagree with the ISRP recommendation of Do Not Fund

- Recommend full funding for the O&M and M&E portions contingent upon the sponsor submitting a complete M&E plan as outlined in the cover document of the report (Page 1, Section 1).

- The MOA and subsequent covenant with the Bureau of Indian Affairs and Kalispell Tribe of Indians states that in the event of failure to meet the goals and expectations listed in the MOA, BPA can cease payment for all or part of the activities related to the parcel and that such responsibility falls on the Bureau of Indian Affairs and Kalispell Tribe of Indians.

- Article 13 of the MOA states: *“BPA shall provide reasonable amounts of funding for operation, maintenance, monitoring, and evaluation of the Ranch that is determined to be necessary to maintain positive wildlife and or wildlife habitat benefits for the life of the project. The life of the project is the time it will take to improve the habitat to achieve the minimum habitat unit values guaranteed by the Tribe in paragraph 3(b) above. BPA may fund operation, maintenance, monitoring, and evaluation up to the levels suggested in the plan”*.

- Article 16 states: *“In the event BPA reasonably determines the Tribe has substantively breached this Agreement, the management plan, or any agreement or plan to which this Agreement is appended, BPA may discontinue payment of all or a portion of any funds due to the Tribe, and the Tribe shall hold harmless and indemnify BPA for any loss of credit BPA suffers as a result of the discontinuance of funds.....”*.

**Project Number 199206100 - Albeni Falls Wildlife Mitigation Project**

- Disagree with the ISRP recommendation of Do Not Fund

- Recommend full funding for the Implementation, O&M and M&E portions contingent on the sponsor submitting a complete M&E plan as outlined in the cover document of the report (Page 1, Section 1). Past performance has been acceptable on the implementation and O&M portions of this project. The funding should be continued based on the development of an M&E plan.

- A do not fund decision would create a new situation with regard to ownership and management of the acquired property. The MOA states that in the event the property is not managed in accordance to the goals and expectations of the MOA, BPA may take over management of the property. This may necessitate that BPA take ownership of the property and to find another property manager. We are not inclined to own and operate land for wildlife activities and would need to seek another agency or organization to perform those functions. This could prove to be a contentious action.

**Project Number 199500100 – Kalispell Tribe Resident Fish**

- Agree with the ISRP that Objective 2, task a., should not be funded.

**FY 2002 FUNDING RECOMMENDATIONS FOR  
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**Project Number 199608720 - Focus Watershed Coordination in the Kootenai River Watershed**

- We disagree with the ISRP and believe that this project should be funded, but modified. Past performance has been acceptable on this project, but the scope and process of the watershed coordination needs to be reviewed. Currently only the Montana portion of the Kootenai is being covered by this project. Also, there is no decision making body, or technical oversight group to aid the coordinator in planning and decision making. To address these issues, we propose that an organization such as Kootenai River Network would potentially be a more appropriate entity to lead this effort. We also disagree with CBFWA in trying to combine this with 9500400. The scope of this project has always been to cover the entire Kootenai basin (at least the US part). We agree that it is tied to 9500400 since they are both in the Kootenai basin, but there is not otherwise a strong link between the projects. The watershed coordinator position should continue as a stand alone planning and implementation program for the entire Kootani River watershed.

**Project Number 200000400 - Monitor and protect bull trout for Koocanusa Reservoir**

- We agree with the ISRP comment that the final completion report will require a rigorous analysis of the data collected.

**4. Fund In Part – New**

The following two projects are a combination of ongoing projects and new projects designed for wildlife mitigation. The existing portions of these projects should be funded, but the wildlife mitigation objectives should not be funded for the reasons stated in the cover letter.

**Project Number 24018 – Secure and Restore Critical Fish and Wildlife Habitats**

- Do not fund objectives #1, #2, and #3. These objectives are for wildlife mitigation that should be funded out of the Montana wildlife mitigation agreement with the State of Montana for Libby and Hungry Horse dams.

- Objective 4 should be funded. It is a continuation of ongoing project 9608701 Focus Watershed Coordination - Flathead River Watershed

- Objective 5 should be funded. It is a continuation of ongoing project 9101901 Flathead Lake Monitoring and Habitat Enhancement.

- Do not fund Objective 6, Comprehensive I&E program. This appears to be primarily connected to Objectives #1, #2 and #3, which we are recommending not be funded.

- Do not fund Objective #7. We agree with the ISRP comments on inadequacy of the shoreline erosion portion of the proposal.

- Do not fund Objective #8. Subbasin planning will be funded through the Council subbasin planning process.

**Project Number 24019 - Research, Monitor, and Restore Native Species**

- Fundable in part. Agree with the ISRP comments to fund fisheries monitoring with qualifications. Fund objectives 1-6 under project 199101901, Hungry Horse Fishery Mitigation – Flathead Lake. We agree with the ISRP comments on the monitoring program in relation to monitoring lake fish populations in the lake relative to habitat restoration. We are also not aware on any ongoing lake trout control program, which would be needed as part of a successful monitoring program.

- Do not fund the wildlife/sharp-tailed portion of this project. Wildlife mitigation for Libby Dam and Hungry Horse Dam has been funded with the state of Montana under the Wildlife

**FY 2002 FUNDING RECOMMENDATIONS FOR  
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Mitigation Agreement for Libby and Hungry Horse Dam of 1988. This project would more appropriately be funded from this agreement.

- Additionally, we believe it is inappropriate in this instance to mix wildlife and fish projects together. The ISRP comments that they should be "assured that progress in its program objectives can be isolated from those of other supporters". When projects combine numerous

objectives that are not related, the evaluation of success becomes very difficult. We acknowledge that the Council Program calls for an integrated approach, and we have funded land acquisition projects that have benefits for both fish and wildlife. This project combines two very distinct projects with unrelated goals and objectives, which would be much easier to analyze if they were separated.

**5. Potentially Fundable After Completion of Subbasin Planning – No Comments/Qualifications**

The following projects should be reconsidered for funding after subbasin planning is completed as discussed in our cover letter. We have no comments in addition to the ISRP/CBFWA review comments.

<b>Project Number</b>	<b>Title</b>	<b>Sponsor</b>	<b>Subbasin</b>
24003	Acquire and conserve high priority bull and westslope cutthroat trout habitat in Trestle Creek.	Idaho Department of Fish and Game	Pend Oreille Upper
24004	Pend Oreille/Priest Exotic Fish Species Suppression and Native Fish Protection	Idaho Department of Fish and Game	Pend Oreille Upper
24005	Smith Creek Restoration	Idaho Department of Fish and Game	Kootenai
24008	Genetic Inventory of Bull Trout and Westslope Cutthroat Trout in the Pend Oreille Subbasin	Kalispell Tribe of Indians	Pend Oreille Lower
24012	Riparian Habitat Preservation - Weaver Slough and McWinegar Slough	Flathead Land Trust	Flathead
24016	Kootenai River Subbasin Stakeholders Symposium	Kootenai River Network	Kootenai
24023	Purchase Conservation Easement from Plum Creek Timber Company (PCT) along Fisher River	Montana Fish, Wildlife & Parks	Kootani

**6. Potentially Fundable After Completion of Subbasin Planning – With Comments and/or Qualifications**

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The following projects should be reconsidered for funding after subbasin planning is completed as discussed in our cover letter. We have the following comments in addition to the ISRP/CBFWA review comments.

**Project Number 24015 - Wetland/Riparian Protection, Restoration, Enhancement and Maintenance in the Coeur d'Alene Subbasin**

- We have concerns that no specific parcels have been identified for this project. This project should only be funded if a set of clear definable goals, objectives and time frames are

established in conjunction with the other land acquisition projects, i.e. 199004401 Lake Creek Acquisition and Enhancement, and the 199206100 - Albeni Falls Wildlife Mitigation Project.

**Project Number 24017 - Restoring Bull Trout Habitat in the Blackfoot River's North Fork**

- The Blackfoot is identified as one of the bull trout core areas in the Montana's Roundtable recovery plan. We agree that the state or Trout Unlimited should get longer-term agreements for the water use or at least an option. There is also a question of the value of spring creek's bull trout use.

**Project Number 24020 - Center for GIS Analysis and Information in the Coeur d'Alene Subbasin**

- This is a fundable project provided there is coordination with existing GIS services and there is no duplication of effort. We agree that the GIS center should eventually become a self-supporting endeavor.

**7. Do Not Fund – Ongoing**

The following project should not be funded to continue implementation of the current objectives. We agree with the technical review of the ISRP.

**Project Number 199004402 - Coeur d'Alene Tribe Trout Production Facility**

- Do not fund. The sponsor has failed to adequately address several technical issues such as:

- Adequate water quantity and water quality
- Predation of juvenile cutthroat in Lake Coeur d'Alene
- Effects of project 199004400 on rejuvenated populations
- Cost effectiveness

**8. Do Not Fund – New**

The following projects should not be funded based on our agreement with the ISRP comments on the scientific merit of the projects, or with CBFWA on the timing and need for the project.

**Project Number 24002 – Using DNA From Bear Hair Samples to Confirm Grizzly Bear Presence in the Lower Pend Oreille Subbasin**

We agree with this assessment on a technical basis that the project should not be funded.

**Project Number 24006 - Pend Oreille Erosion Abatement and Landform Restoration**

- Do not fund. We agree that on a technical basis this project should not be funded. In addition, because this project deals with the Albeni Falls mitigation project, we agree with

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the CBFWA recommendation that the project should be reviewed and funded under the Albeni Falls Wildlife Mitigation Project 199206100.

-We are concerned about the proposal statement that this project would look at existing parcels purchased under the Albeni Falls Wildlife Mitigation Project. The proposal states, *“The proposed study would compliment current AFWWG wildlife mitigation activities where existing wetlands are acquired, restored, and enhanced, by protecting existing public land from further erosion, and restoring lost land area”*. We should not fund an additional project to look at erosion issues on these parcels. The Albeni Falls Wildlife Mitigation Project should deal with those issues under it’s own O&M phases.

**Project 24007 – Characterization and Assess Wildlife-Habitat Types and Structural Conditions for Sub-Basins within the Mountain Columbia Ecoprovince**

- Do not fund. We agree with CBFWA that this project should not be funded until a clear priority for this need is established through the subbasin planning process.

**Project Number 24013 – Assessments of Operational Impacts of Hungry Horse Dam on Riparian Habitat and their Associated Aquatic Components**

- Do not fund. We agree with the ISRP recommendation based on the technical merits of the project.

**Project Number 24014 – Assessments of Operational Impacts of Libby Dam on Riparian Habitat and their Associated Aquatic Components**

- Do not fund. We agree with the ISRP recommendation based on the technical merits of the project.

**Project Number 24025 - Pend Oreille Subbasin Native Westslope Cutthroat Population Study**

- Do not fund. Disagree with ISRP and agree with CBFWA that the project is not well coordinated with the fish and wildlife managers, and that much of the work is potentially duplicative with other completed work. The project should not be funded until all parties can agree that the work is necessary.