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March 1, 2007

MEMORANDUM

- **TO:** Fish and Wildlife Committee Members Council Members
- FROM: Patty O'Toole John Shurts

SUBJECT: Bonneville's FY2007-09 project funding decision letter

One topic on the agenda for the Council's March meeting, and the entire agenda for the Fish and Wildlife Committee's special meeting March 5, will be a discussion of Bonneville's decision in response to the Council's project funding recommendations for FY2007-09.

Attached to this cover memorandum are summary tables from the staff summarizing Bonneville's decisions and the key differences from the Council's recommendations. Staff will present additional information at the Committee and Council meetings.

Also attached is an outline of key issues presented by Bonneville's decisions. The list is the product of many collective and individual discussions and reviews over the last week and a half among members and central and state staff. This does not mean the list is exhaustive, but we do believe it captures the main themes.

The obvious question is whether and how the Council responds to Bonneville's decisions. That will be the main focus of the discussions with the Committee and the Council, and people have posited a range of reactions and responses. A couple of suggestions:

First, Bonneville has asserted a number of broad policy initiatives in this decision, especially in areas that the Council has also expressed an interest in engaging, such as reform in the program's load of monitoring and evaluation and related matters. The Council had a preferred approach to dealing with these issues: (1) *interim* funding for projects in certain areas, while the Council reviews and, if possible, develops better priority recommendations for elements of the program in the near term, with major resolution of these policy areas to take place in (2) the

program amendment process and (3) the next project review process. Our suggestion is that it still makes sense for the Council to focus its energy and resources in those upcoming reviews and events -- and especially on resolving these policy issues and the matter of roles and responsibilities in the program amendment process.

Second, this still leaves the question of what to do about project funding issues raised with the FY07 through 09 period itself. And the suggestion here is to engage in this way:

(1) Just as the Council treated its project funding recommendations in certain areas as *interim* pending further review and resolution of certain issues, the Council might let Bonneville know that the Council similarly treats Bonneville's assertion of these policies and their application especially in the 08 and 09 budget figures as just as *interim* as the Council's, while we pursue the review and possible reform of these elements of the program.

(2) We also have a series of important clarifications/commitments to ask of Bonneville. This includes the need for ISRP review of projects Bonneville added that did not yet get or complete ISRP review; assuring the appropriate Step review of added projects where appropriate; clarification of the rescheduling and carry forward rules after 07; and so forth, as outlined in the issue list.

(3) Engage with Bonneville on project-specific issues arising out of their decision as the need arises.

Again, there are other possible ways to respond. These are merely suggestions to consider.

List and description of issues arising out Bonneville's FY07-09 decision letter *revised March 7*, 2007

Totals/Overall effect

- *See* Tables attached summarizing Bonneville's decisions and the differences from the Council's recommendations. The staff will have additional information at the Committee and Council meetings
- Whether looked at in terms of # of projects affected or \$\$ amounts changed, overall Bonneville made significant changes to the Council's project funding recommendations in the expense category (we do not know about capital yet). Bonneville did so in part by applying a set of policy and project preferences (many outlined below), with the following resulting effects:
 - An overall addition of money to anadromous habitat and production projects (and to other projects proposed by the tribes in the anadromous areas) and to certain rm&e projects favored by Bonneville.
 - An overall reduction of money *from* funding for projects above Hells Canyon and Lake Roosevelt and Lower Columbia; *from* rme&c projects and work elements in general (except for the rm&e projects favored by Bonneville); *from* new projects, and *from* 09 budgets for on-going projects labeled in lieu projects, based on this set of policy and project reasons. Also, Bonneville's decisions allocated the reserve amounts the Council left unallocated.
 - > The end result does not necessarily mean a *shift* in funding from the areas reduced to the areas increased. Under the budget planning target the Council used, what Bonneville has done would indeed result in a shift, as Bonneville allocated up to that planning target. But the budget planning target Bonneville is using turns out to be much higher than the Council understood -- \$477 million over three years rather than the \$459 million the Council used. So even with Bonneville allocating a higher three-year total than the Council did, Bonneville estimates that there could still be as much as an additional \$20 million in planning flexibility. Because of the fact that more money is available than the Council expected, for provinces and project areas that show reduced totals compared to the Council's allocations, Bonneville said that its decision "does not overtly reflect moving these dollars to other provinces," and instead simply that "these dollars are not reflected as being spent" and that Bonneville invites the Council to work with Bonneville in deciding how to use the available funds. At the same time, the Council should note that while these additional funds may be available, they come with restrictions, including the policies Bonneville applied along the way to the reductions and a caution about adding more in Fy07. One big question going forward will be whether funds truly are available in the areas that show spending reduced compared to the Council's allocations, given the policy obstacles that led to the reductions in the first place (see below).
 - O8 and 09 budget totals may also be affected by the fact that most of the 07 Ops Agreement projects do not have 08 and 09 budgets (some do). This may be understandable under the legal circumstances, but the odds are that at least most will have 08 and 09 budgets, and so Bonneville's 08 and 09 totals may be higher than depicted (again, in anadromous areas), using up some of the flexibility.

Issues arising out of the disparate policy elements are outlined below. But a threshold issue is whether the Council wants to react to this overall picture, and if so, how? At its core, this presents less of a legal issue about direct instances of Program inconsistency and more of a mixed policy/legal concern about the appropriateness of Bonneville asserting an overriding programmatic policy approach in this forum, policies that seem better suited to the Program and a Program amendment process.

Broader policy and legal issues

- Consistency with the Council's Fish and Wildlife Program
 - ➢ After re-write, any problems with way Bonneville explains consistency? Still analyzing.
 - Any decisions clearly not consistent with Program? Are there explanations for deviations? None for law enforcement projects. Three more important questions will be:
 - (1) Do project decisions in any subbasin run counter to subbasin priorities and strategies?
 - (2) If Bonneville reduced or rejected a project that is based in program priorities, and did so based on an application of policies such as a lack of an FCRPS nexus or an in lieu situation, that would be an adequate explanation for a program inconsistency *if* those policies are appropriately applied. That will be a key question on a project-specific basis.
 - (3) Do the overall changes have a significant effect on the Program's 70-15-15 allocation provision? Bonneville says no (pp. 21 of the Decision Enclosure).
- Bonneville's policy (which it calls "reinvention") of using proportionate spending goals to shift funding from rme&c to on-the-ground habitat and production actions
 - What does the Council think of this particular policy? Resisted it before; still desire to resist?
 - On the other hand, the Council came to a policy conclusion in its recommendations that is similar or related to Bonneville's underlying concern: The program spends a lot of money on rme&c (and data management as part of that) without the best plans to guide this spending and thus without the best understanding of what are the priority tasks to fund. The Council's recommended method for responding to this situation was (1) to set *interim* funding levels for projects in these categories, often at less than requested levels, and then to review and develop a better set of priorities before making final recommendations for this rate period, and then (2) to use the Program amendment and next project review processes to resolve these concerns for the longer term. Bonneville's approach -- to go ahead and reduce rme&c budgets and shift funds to habitat and production actions with a percentage goal -- may be complementary *or* it may get in the way of the Council undertaking these reviews and finalizing project recommendations for 08 and 09.
 - So, what does the Council think of the *way* Bonneville imposed the policy, as a programmatic policy assertion outside of a Program amendment process and in a way that may (or may not) work contrary to the Council related initiatives in these areas? Again, this may not be a direct Program consistency issue, because the Program itself is quite general in these areas right now, but how appropriate is it for Bonneville to assert

such a direct programmatic policy in the absence of provisions on this topic in the Program and with a Program amendment process coming up?

- Just as important, how consistently did Bonneville apply this policy? Budgets for a number of rm&e projects favored by Bonneville go up, not down, the net effect of which in part accounts for the fact that Bonneville reports an overall modest shift toward its spending goal.
- > Staff will have information on the magnitude of this shift at the meetings.

• ESA implementation in anadromous basins

- Nearly all of the projects Bonneville *added* to the Council's recommendations are intended by Bonneville to implement the 2004 UPA, or to anticipate ESA requirements in the new FCRPS Proposed Action and BiOp, or to settle ESA litigation issues around 07 operations.
- The fact that Bonneville decided to add these projects may not be as much of an issue for the Council as the possible effects these additions might have for the rest of the package, such as effects on the 70-15-15 target, etc.
- > Staff will have information on the magnitude of these effects at the meetings.

• In lieu

- Overall policy -- Concern about continued reliance on what seems to us a relatively arbitrary cost share percentage as proof of no in lieu problem, especially the 15% reduction factor in FY09. Bonneville recognizes that there are other ways of proving that an in lieu situation does not exist, but for now relies on the cost-share concept, turning what is an in lieu prohibition into a cost share policy. Does the Council want to apply its staff and member resources to design and implement an alternative approach, as Bonneville essentially invites?
- In lieu ratings -- particular problems?
- Projects reduced or removed from list for lack of nexus to FCRPS or because Bonneville stated they are not a "priority" for the FCRPS. How to respond?
 - > areas of the basin -- above Hells Canyon and Grand Coulee and in the Lower Columbia
 - particular species, such as bull trout
 - types of m&e, such as population status monitoring -- concern over this shows up in the in the m&e "reinvention" and in lieu initiatives, too
 - for these last two categories, this seems to staff a relatively expanded and aggressive assertion of programmatic policy by Bonneville -- again, is this the right place for that kind of policy assertion and application, outside of a Program amendment process?

Other issues, including explanations, clarifications and commitments needed

• Missing projects

- Without the *capital* table, impossible to evaluate what's next for capital expenditures and hard to evaluate how appropriate are the expense budgets for capital projects.
- Apparently, a few within-year or close-out projects and budgets are missing, including Abernathy. Any others?

ISRP and ISAB were not in the tables with the decision documents, but were in the Excel spreadsheet, fully funded.
Others?

- **ISRP review**. Need for ISRP review of projects that did not yet "pass" ISRP review, consistent with how the Council conditioned similar funding recommendations on further ISRP review. Bonneville added projects that ISRP rated not fundable, that got an ISRP rating of "response requested" but did not go through the loop again, and that never got reviewed (enforcement projects). Staff will have a list at the meetings.
 - ➤ same issue with projects added that are in Step review
- **Explanations.** In some cases, Bonneville still needs to supply explanations for changes that it made to the Council's recommendations. Bonneville explained most of the changes it made in project budgets (and in removing projects from the list or adding projects to the list) as based on: (1) the policies noted above, such as the "reinvention" policy of shifting money from rme&c to on-the-ground activities; lack of FCRPS nexus; in lieu issues; or ESA needs, including settlement of 07 operations in the ESA litigation; or (2) a project-specific difference with the Council on the appropriate scope or work elements for a project unrelated to any broader policy issues (very few of these); or (3) a Bonneville re-evaluation of what is an appropriate budget for the work recommended, in a form of project-cost tweaking Bonneville usually engages in during contracting. But some changes in project budgets are not sufficiently explained to understand why they've been made, and need to be.
 - as a collective version of this issue, Intermountain project budgets and the provincial total seem to have reduced the most without full explanation. Is this an accurate perception?
- **Rescheduling and carry forward**. We need a commitment on rescheduling and carry-forward rules following 07.
- June 1 deadline. Bonneville has set a June 1 deadline for recommendations to change Bonneville funding decisions for the following fiscal year, such as from o&m or coordination or m&e review. *See* Page 7, footnote 9. Is this realistic?
- Project specific issues from individual states
- Other issues?

Draft

Three				Overall	
year totals		Council	Bonneville	province	
lotais	Province/area	recommendation	decision	net impact	Total change in \$
	Basinwide	\$83,393,276	\$94,120,997	Increase	\$10,727,721
	Blue Mountain	\$21,351,492	\$23,648,072	Increase	\$2,296,580
	Columbia Cascade	\$9,001,998	\$19,260,753	Increase	\$10,258,755
	Columbia Estuary	\$10,979,912	\$12,975,000	Increase	\$1,995,088
	Columbia Gorge	\$15,643,652	\$16,072,655	Increase	\$429,003
	Columbia Plateau	\$64,081,909	\$67,594,810	Increase	\$3,512,901
	Intermountain	\$45,861,678	\$39,785,202	Decrease	-\$6,076,476
	Lower Columbia	\$7,545,387	\$6,520,708	Decrease	-\$1,024,679
	Mainstem/Multiprovince	\$39,890,123	\$40,375,927	Increase	\$485,804
	Middle Snake	\$10,122,237	\$4,856,997	Decrease	-\$5,265,240
	Mountain Columbia	\$37,770,529	\$35,767,717	Decrease	-\$2,002,812
	Mountain Snake	\$50,279,915	\$51,548,180	Increase	\$1,268,265
	Upper Snake	\$4,725,066	\$3,144,223	Decrease	-\$1,580,843
	Enforcement	\$0	\$610,000	Increase	\$610,000
	Total	\$400,647,174	\$416,281,241	Increase	\$15,634,067
	Innovative Placeholder	\$3,000,000	\$2,000,000		
	Basinwide Reserve	\$8,457,119	\$0		
	Unallocated placeholder	\$6,000,000	\$0		
	Within year reserve	\$0	\$6,000,000		
	ISRP/ISAB	\$3,150,000	+ -	BPA includes	in Basinwide
	BPA Program Support	<u>\$33,000,000</u>	<u>\$36,000,000</u>		
	3-year total	\$454,254,293	\$460,281,241		
	Annual average	\$151,418,098	\$153,427,080		

Table 2. Summary of Bonneville decision, FY 2007

Y		No.		No. of		No. of rec projects					
07		projects	No. of	new	No. of	not	Total	Percent			
		Council	projects	projects	project	funded	number	project		Bonneville \$ Province	Total
	Province/area	Rec	increased	• •		by BPA	changes	change	Council \$ Rec	decision net impac	t change in \$ Comment
	Basinwide	47	0	c	18	2	35	74%	\$ 30,356,447	\$33,518,581 Increase	Council rec \$3,162,134 \$30,306,446
	Blue Mountain	47	9		-	2			+,,		
		-	2		4	1	12	67%	\$7,117,164	\$8,320,750 Increase	\$1,203,586
	Columbia Cascade	15	4	11	0	1	16	107%	\$4,038,665	\$7,488,622 Increase	\$ 3,449,957 BPA number
	Columbia Estuary	5	2	0	1	1	4	80%	\$3,932,800	\$4,175,000 Increase	\$ 242,200 differs from po
	Columbia Gorge	13	0		6	1	10	77%	\$4,559,181	\$5,199,751 Increase	\$640,570
	Columbia Plateau	52	14		9	3	35	67%	\$21,973,636	\$25,087,807 Increase	\$3,114,171
	Intermountain	24	0		7	1	9	38%	\$15,241,904	\$13,382,186 Decrease	-\$1,859,718
	Lower Columbia	13	2	-	1	5		92%	\$2,421,071	\$2,426,599 Increase	\$5,528
			-			Ū.	.=	02/0	<i>\\\\\\\\\\\\\</i>	<i>q</i> _,0,0000400	BPA number
	Mainstem/Multiprovir	12	5	1	0	2	8	67%	\$13,410,639	\$14,777,493 Increase	\$1,366,854 differs from p
	Middle Snake	13	0	0	4	5	9	69%	\$3,390,828	\$1,766,145 Decrease	-\$1,624,683
	Mountain Columbia	16	2	0	1	2	5	31%	\$12,589,847	\$12,597,108 Increase	\$7,261
	Mountain Snake	32	2	8	2	1	13	41%	\$16,933,305	\$17,756,975 Increase	\$823,670
	Upper Snake	5	0	0	0	2	2	40%	\$1,381,643	\$1,026,543 Decrease	-\$355,100
	Enforcement	0	3	0	0	0	3		\$0	\$610,000 Increase	\$610,000
	Total	265	45	48	53	27	173	65%	\$137,347,130	\$148,133,560 Increase	\$610,000
							Innovative P	laceholder	\$1,000,000	\$0	
							Basinwide R	eserve	\$2,337,714	\$0	
							Unallocated	placeholde	\$2,000,000	\$0	
							Within year r	eserve	\$0	\$2,000,000	
							ISRP/ISAB		\$1,050,000		les in Basinwide

BPA Program Support

Total

\$11,000,000 \$154,734,844 \$161,633,560

Table 3. Summary of Bonneville decision, FY 2008

Data from BPA decision 07_09 for web (expense only) draft 2/28/2007

L											diant 2
8 Province/are	No. projects Council a Rec	No. of projects increased	No. of new projects by BPA	No. of project decreased	No. of rec projects not funded by BPA	Total number changes	Percent project change	Council \$ Rec	Bonneville \$ decision	Overall province net impact	Total change in \$ Comme
Basinwide	40	8	4	16	4	32	80%	\$ 27,120,297	30,852,650	Increase	3,732,353
Blue Mountain	18	2		5	1	11		\$7,117,164	\$7,767,240		650,076 BPA numb
Columbia Casca	de 15	2	9	0	1	11	73%	\$3,023,665	\$6,384,174	Increase	3,360,509 differs from
Columbia Estuar	y 5	3	0	0	1	3	60%	\$3,519,712	\$4,475,000	Increase	955,288
Columbia Gorge	13	0		6	1	7		\$6,558,587	\$6,458,952		-99,635 BPA numb
Columbia Platea	u 50	11	7	9	6	27	54%	\$21,061,636	\$21,376,996	Increase	315,360 differs from BPA numb
Intermountain	26	0	1	13	1	14	54%	\$15,313,245	\$13,324,516	Decrease	-1,988,729 differs fror
Lower Columbia	9	0	2	1	6	3	33%	\$2,271,988	\$1,917,061	Decrease	-354,927
Mainstem/Multip	rovir 12	4	0	3	0	7	58%	\$13,271,558	\$13,031,033	Decrease	-240,525 BPA numb
Middle Snake	13	1	0	5	6	6	46%	\$3,290,350	\$1,611,145	Decrease	-1,679,205 differs from BPA numb
Mountain Colum	bia 16	0	1	4	5	5	31%	\$12,590,145	\$11,794,138	Decrease	-796,007 differs from
Mountain Snake	31	1	5	1	4	7	23%	\$16,673,305	\$17,064,108	Increase	390,803
Upper Snake	5	0	0	1	2	1	20%	\$1,604,401	\$1,082,001	Decrease	-522,400
Enforcement	0	0	0	0	0	0		\$0	\$0	\$-	0
Total	253	32	33	64	38	167	66%	\$133,416,053	\$137,139,014	Increase	\$3,722,961
						Innovative P Basinwide R Unallocated Within year r ISRP/ISAB BPA Program Total	eserve placeholde eserve	\$1,000,000 \$2,457,820 \$2,000,000 \$0 \$1,050,000 <u>\$11,000,000</u> \$150,923,873	\$12,000,000	BPA include	s in Basinwide

Draft

Table 4. Summary of Bonneville decision, FY 2009

Data from BPA decision 07_09 for web (expense only) draft 2/28/2007

Province/area	No. projects Council a Rec	No. of projects increased	No. of new projects by BPA	No. of project decreased	rec projects not funded by BPA	Total number changes	Percent project change	Council \$ Rec	Bonneville \$ decision	Overall province net impact	Total change in \$ Co	omment
Basinwide	40				4	28	70%		29,749,766		3,833,234	
Blue Mountain	19	-			2	10	53%	\$7,117,164	\$7,560,082		442,918	PA number
Columbia Cascad	de 11	2	9	0	1	12	109%	\$1,939,668	\$5,387,957	Increase	3,448,289 dif	
Columbia Estuar	y 5	3	0	0	1	4	80%	\$3,527,400	\$4,325,000	Increase	797,600 dif	fers from
Columbia Gorge	14	1	0	-	1	8	57%	\$4,525,884	\$4,413,952	Decrease	-111,932 BF	PA numbe
Columbia Platea		10	7		7	36	71%	\$21,046,637	\$21,130,007			PA numbe
Intermountain	26		0		1	15	58%	\$15,306,529	\$13,078,500		-2,228,029 dif	fers from
Lower Columbia	13		2		7	12	92%	\$2,852,328	\$2,177,048	Decrease	-675,280	
Mainstem/Multipr				-	0	7	58%	\$13,207,926	\$12,567,401			PA numbe
Middle Snake	13				6	12	92%	\$3,441,059	\$1,479,707			PA numbe
Mountain Columb				4	5	10	77%	\$12,590,537	\$11,376,471		-1,214,066 dif	fers from
Mountain Snake	31	2			4	15	48%	\$16,673,305	\$16,727,097		53,792	
Upper Snake	4	0			1	2	50%	\$1,739,022	\$1,035,679	Decrease	-703,343	
Enforcement	0	0	0	0	0	0		\$0	\$0			
Total	252	35	31	65	40	171	68%	\$129,883,991	\$131,008,667	Increase	1,124,676	
						Innovative P		\$1,000,000	\$1,000,000			
						Basinwide R		\$3,661,585	\$0			
						Unallocated	•		\$0			
						Within year r	eserve	\$0	\$2,000,000			
						ISRP/ISAB		\$1,050,000		BPA include	s in Basinwide	
						BPA Prograr	n Support	<u>\$11,000,000</u>	<u>\$12,500,000</u>			
						Total		\$148,595,576	\$146,508,667			

Draft

Council Budget Planning

- \$143 M Spending per year X 3 years
- \$429 M 3-year spending target
- \$ 30 M\$10M per year planning-to-
spending difference
- \$459 M 3-year planning target
 - \$153 annual planning target

(unallocated placeholder, rate case carry forward and basinwide reserve targeted on ESA, outyear budget needs, transition funds)



Bonneville Budget Planning

- \$143 M Spending per year X 3 years
- \$429 M 3-year spending target
- \$ 3Madditional from 07 operations

agreement

- \$ <u>9 M</u> \$ carried forward from rate case
- \$441 M Revised spending target
- \$ <u>36 M</u> \$12 million per year planning-tospending difference
- \$477 M 3-year planning target
- \$460 M Bonneville budget decision \$159M annual planning budget
- \$ 17 M Available (with restrictions)



FY 2007-2009 BPA decision data

draft March 13, 2007 **FY 2007 - all**

		Data	
FY07 %			
sort	Theme comment	Count of Proposal # Sum of F	Y07 budget differences
<10-	FCRPS	2	-\$27,000
	In lieu	8	-\$274,902
	Other	18	-\$831,551
<10- Total		28	-\$1,133,453
<10+	ESA	1	\$25,000
	In lieu	2	\$19,575
	Other	2	\$71,061
<10+ Tota	l	5	\$115,636
>10-	Agreement	1	-\$24,000
	ESA	1	-\$150,000
	FCRPS	2	-\$277,520
	In lieu	4	-\$559,055
	Other	19	-\$2,881,889
>10- Total		27	-\$3,892,464
>10+	Agreement	2	\$308,001
	ESA	9	\$2,793,904
	In lieu	5	\$589,437
	Other	19	\$3,012,206
>10+ Tota		35	\$6,703,548
BPA Adde	Agreement	14	\$4,882,431
	Close	13	\$1,686,743
	ESA	21	\$4,308,089
	Other	11	\$2,718,935
BPA Adde	d Total	59	\$13,596,198
Not funded	k	25	-\$4,603,028
Grand Total		179	\$10,786,437

FY 2008 - all

		Data	
FY08 % so	Theme comment	Count of Proposal #	Sum of FY08 budget differences
<10-	FCRPS	1	-\$9,569
	In lieu	g	-\$322,014
	Other	26	-\$1,158,666
<10- Total		36	-\$1,490,249
<10+	In lieu	2	\$28,092
	Other	6	\$141,594
<10+ Tota		8	\$169,686
>10-	Close	1	-\$484,500
	FCRPS	2	-\$162,000
	In lieu	6	-\$1,236,422
	Other	19	-\$4,091,113
>10- Total		28	-\$5,974,035
>10+	ESA	6	\$2,600,292
	In lieu	4	\$462,048
	Other	14	\$2,611,878
>10+ Tota		24	\$5,674,218
BPA Adde	Agreement	2	\$1,129,938
	ESA	19	\$5,552,918
	Other	10	\$2,441,545
BPA			
Added			
Total		31	\$9,124,401
Not funded	Agreement	3	-\$574,999
	FCRPS	19	-\$3,321,730
	In lieu	2	-\$157,872
	Other	14	-\$2,696,136
Not funded	Total	38	-\$6,750,737
Grand Tota	al	165	\$753,284

FY 2009 - all

		Data	
FY09 %			
sort	Theme comment	Count of Proposal #	Sum of FY09 budget differences
<10-	FCRPS	1	-\$19,282
	In lieu	2	-\$98,824
	Other	21	-\$1,047,839
<10- Total		24	-\$1,165,945
<10+	In lieu	2	
	Other	5	\$141,550
<10+ Tota		7	\$169,642
>10-	FCRPS	1	-\$100,000
	In lieu	21	-\$3,271,356
	Other	23	-\$4,934,296
>10- Total		45	-\$8,305,652
>10+	ESA	7	\$2,502,277
	In lieu	3	\$352,214
	Other	15	\$3,265,004
>10+ Tota		25	\$6,119,495
BPA Adde	Agreement	2	\$1,934,322
	ESA	19	\$4,625,383
	No change, not rec	1	\$595,965
	Other	10	\$2,373,886
BPA Adde	d Total	32	\$9,529,556
Not funded	Agreement	3	
	FCRPS	17	-\$3,639,788
	In lieu	2	-\$170,667
	No change, not rec	1	-\$30,000
	Other	15	-\$3,176,988
Not funded	Total	38	-\$7,592,443
Grand Total		171	-\$1,245,347