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Dec. #31

December 15, 2000

Mr. Frank L. Cassidy Jr., Chair  
Northwest Power Planning Council  
851 S.W. 6<sup>th</sup> Avenue, Suite 1100  
Portland, OR 97204-1348

Dear Chairman Cassidy:

I am writing you in response to the Northwest Power Planning Council (NWPPC) request (R. Lohn to T. Iverson, 12/11/00) for a recommendation on the Arrowleaf property conservation acquisition/easement proposal.

The Columbia Basin Fish and Wildlife Authority (CBFWA) shares the NWPPC's concern that this proposal falls outside of the two established processes for making funding recommendations: the Rolling Provincial Review and the "High Priority" project solicitation. However, the CBFWA has completed an expedited review of the proposal. The Anadromous Fish Committee (AFC) and the Members' Management Group (MMG) reviewed the proposal on December 12, 2000. The greatest concern by CBFWA members was that by funding this project now, other projects that may be identified as higher priority either in the "High Priority" solicitation or the Columbia Cascade Province review, might be put at a funding disadvantage.

The CBFWA has determined that this proposal has clear fish and wildlife benefits, but because we have not yet seen the other "High Priority" proposals, we are unable to establish a priority for this proposal at this time. This project addresses concerns raised by the National Marine Fisheries Service (NMFS) in their FY 2000 Biological Opinion and lies within one of three first-year "High Priority" subbasins identified in the All-H Paper.

This proposal meets the Fish & Wildlife Program criteria for a "High Priority" project, in that: it represents a time-limited opportunity to address imminent risks to the survival of an ESA-listed species; it is consistent with the Northwest Power Act and is not in lieu of others' responsibilities; and, implementation can be completed by September 30, 2001. It also is similar to a "High Priority" project because it cannot await the Rolling Province Review of the Columbia Cascade Province; however, other "High Priority" projects should not be jeopardized by funding this project at this time.

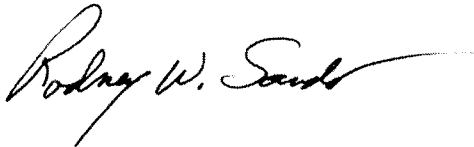
It is our understanding that Bonneville Power Administration (BPA) proposes to fund this project from the unallocated Anadromous Fish Placeholder within the Fish and Wildlife

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Program. The CBFWA opposes taking the funds from the \$127 million that BPA has made available under the MOA Budget. There is over \$20 million in anadromous fish projects, \$1.8 million in resident fish projects and \$14 million in wildlife projects already reviewed and on hold until additional funds become available in FY 2001 (see CBFWA's FY 2001 DAIWP). There is insufficient time for CBFWA to determine whether this proposal is of a higher priority than these previously reviewed projects. CBFWA also opposes funding this project from the proposed FY 2001 "High Priority" project placeholder or land acquisition funds. Again, this is because other projects submitted through these solicitation processes could be put at a funding disadvantage.

The CBFWA notes that this is primarily an anadromous fish project and should not be credited against any wildlife losses assessed against the hydropower system.

Sincerely,

A handwritten signature in black ink that reads "Rodney W. Sando". The signature is written in a cursive style with a long horizontal flourish at the end.

Rodney W. Sando, Chair  
Columbia Basin Fish & Wildlife Authority