December 10, 2001

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

Dear Chairman Cassidy:

This letter is to formalize the Columbia Plateau project funding recommendations presented to you by the Columbia Basin Fish and Wildlife Authority (CBFWA) Members at the Northwest Power Planning Council's (NWPPC) November 7, 2001, meeting in Idaho Falls. This presentation was a follow up to a September 26, 2001 letter CBFWA transmitted to the NWPPC in response to your request to "balance the budget" for the Columbia Plateau Province project recommendations.

The salient concerns expressed by the CBFWA Members at the presentation are summarized below.

**Issue 1:** The \$186 million planning budget is inadequate to protect, mitigate, and enhance fish and wildlife in the Columbia River basin.

- Although the NWPPC's Rolling Provincial Review is not completed and subbasin planning (i.e., Phase II of the NWPPC Fish & Wildlife Program amendment process) has not begun, the identified needs already exceed \$186 million.
- The federal one- and five-year implementation plans for the 2000 biological opinions are not finished and cost estimates have not been established.
- The proposed \$186 million barely covers inflation under the \$127 million promised under the previous Bonneville Power Administration (BPA) budget MOA.
- The BPA rate case from which the \$186 million was derived is under dispute before the Federal Energy Regulatory Commission.
- The NWPPC has not asked for, nor has BPA provided, any factual basis for limiting the fish and wildlife spending to \$186 million.

**Issue 2:** Public involvement and review was lacking in the development of the NWPPC \$186M planning target for FY 2002-2004.

- The NWPPC did not provide public notice of their decision to accept the proposed planning budget.
- The NWPPC should work with the CBFWA Members to establish a public process to develop a FY 2002 budget recommendation to BPA for funding of the NWPPC's Fish and Wildlife Program.

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• Benefits to the local economies from restored fish and wildlife populations should be considered in this discussion.

**Issue 3:** The NWPPC did not implement the budget balancing recommendations in our September 26, 2001 letter.

- The Columbia Plateau Province decisions should be considered "interim" until the budget has been established for all provinces.
- Once a budget is established, the CBFWA and NWPPC should revisit each of the provinces to fund as many additional high priority objectives in ongoing and new projects to ensure effective allocation of limited funds.

**Issue 4:** The NWPPC staff's recommendation to fund new projects in the Columbia Plateau Province over new or expanded tasks proposed for ongoing projects proceeded without a process to assure that these new tasks were more beneficial to the resource than the unfunded tasks proposed for the ongoing projects.

- Legitimate increases in ongoing projects have been lost to new starts.
- New tasks for ongoing projects that addressed the Independent Scientific Review Panel's comments may not be funded under the recommended approach.
- We found it very disconcerting that the NWPPC went forward with its decision with little public deliberation on our recommendation. As a result, we requested that 30 days be provided to allow for collaboration to resolve these issues prior to making a 3-year funding commitment on new projects.

We thank you for the opportunity to present our views on this matter and hope the CBFWA input will be given some level of deference during our discussion on December 11, 2001, regarding the Fish and Wildlife Program's annual budget.

Sincerely,

Rodney W. Sando, Chairman

Kodny W. Sand

Columbia Basin Fish and Wildlife Authority

Cc: Steve Wright, Sarah McNary, and Bob Austin, BPA Steve Crow, Doug Marker, and Members, NWPPC Members and Members Management Group, CBFWA