



COLUMBIA BASIN FISH AND WILDLIFE AUTHORITY

851 SW Sixth Avenue, Suite 260 | Pacific First Building | Portland, OR 97204-1339
Phone: 503-229-0191 | Fax: 503-229-0443 | Website: www.cbfwa.org

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 fish and wildlife agencies:

Burns Paiute Tribe

Coeur d'Alene Tribe

Confederated Salish and Kootenai Tribes of the Flathead Reservation

Confederated Tribes of the Colville 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

May 17, 2007

Greg Delwiche, Vice President,
Environment, Fish and Wildlife
Bonneville Power Administration
905 NE 11th Avenue
Portland, OR 97232

Dear Mr. Delwiche:

The Members of the Columbia Basin Fish and Wildlife Authority (CBFWA) would like to provide comments on Bonneville Power Administration's (BPA) recent process and resulting decision in response to the Northwest Power and Conservation Council's (NPCC) FY 2007-09 recommendations. We have organized our comments into four specific areas; 1) Increased actual and planned budget, 2) In-Lieu, 3) Research Monitoring and Evaluation, 4) Consultation process and the path forward.

Increased Actual and Planned Budget

The Members of CBFWA appreciate the fact that BPA has increased the planning target for the Direct Program budget. CBFWA has long maintained that the budget amount used for planning and project selection should account for the discrepancy between planned budgets and actual expenditures on a year to year basis. Although the NPCC went part way down this path by assuming a \$10 million dollar per year increase over the target amount allocated for actual fish and wildlife spending, we commend BPA for increasing this amount an additional \$2 million dollars per year. Historic spending in the Direct Program supports this planning assumption. Additionally, by identifying of the level of unspent funds in the previous rate period and carrying those funds forward, BPA has demonstrated a commitment to keep dollars intended for fish and wildlife going to fish and wildlife projects. The hard work of the region in the past rate period to report, track, and plan throughout the year based on the actual expenditures of each project has enabled accurate tracking of unspent fish and wildlife mitigation funds. CBFWA is committed to continue working with the rest of the region to keep this process going for the FY 2007-09 rate period as well. Finally, CBFWA appreciates the fact that BPA has allocated an additional amount of funds to supplement the originally identified budget of \$143 million dollars, to support the 2007 river operations agreements.

The Members of CBFWA request that BPA provide a 3-year budget-to-actuals report to allow the region to track the implementation of the ongoing funding decisions and to provide a foundation to discuss any lingering disagreements. This report would provide the BPA 3-year funding decision from February 9, 2007 and the current contracted project budgets for FY 2007 and planned project budgets for FY 2008-2009 (linked at <http://www.nwccouncil.org/fw/budget/2007/bpa/Default.htm>). The report should be updated each month and provided to the Budget Oversight Group for tracking. Transparency in the status of annual budgets is critical to managing within-year budget requests.

In-Lieu

The CBFWA recognizes that BPA is attempting transparency with regard to its application of the in-lieu funding provision of the act, section 839b(h)(10)(A). We ask that BPA continue to discuss how it is applying this provision and expect that, as a result, the ratings that have been assigned will change. We are particularly concerned that since BPA's decisions have reduced FY 2009 planned funding levels to 85% of FY 2008 levels, efforts may be made to reallocate those funds for other uses. CBFWA feels strongly that this outstanding issue be one of the first to be addressed as we proceed forward on the decisions to finalize project decisions for FY 2008 and FY 2009. We disagree with many of the assumptions BPA provides in its decision document. The harm caused by the Federal Columbia River Power System (FCRPS) to the populations that we manage affects the actions we choose to support and implement. The in-lieu determination for these projects must be determined in collaboration with our Members.

Research, Monitoring, and Evaluation

The Members of CBFWA do not support the arbitrary allocation of funds into categories as presented in BPA's "reinvention" strategy. The Fish and Wildlife Program does not exist in isolation and cannot be managed from that perspective. The region needs to establish a regional plan that incorporates all restoration efforts and biological objectives. A more thoughtful approach would define what BPA should fund in each of the categories to best enhance research, monitoring, evaluation, and other activities throughout the basin. The funding level for the Fish and Wildlife Program should be established after developing a comprehensive plan, and the funding allocation among categories and between geographic provinces should be determined based on biological priority, highest priority management needs, and consideration of the impact of the FCRPS on managed populations. The flexibility that the BPA fund provides, allows cost share and enhancement with other funding sources. If we remove the flexibility within the BPA fund, the cost share opportunities may disappear as well.

The fish and wildlife managers are currently working on developing a data management framework for the Fish and Wildlife Program which will help define what the primary data needs are for the Fish and Wildlife Program and which projects are instrumental in providing the mechanisms for regional reporting. The Status of the Resource project is our first step towards building an information framework to support decision making within the Fish and Wildlife Program. The CBFWA Data Management Framework Subcommittee is working with the Northwest Environmental Data network (NED) project to develop this framework. We encourage you to assign staff for this effort to insure BPA involvement during this crucial step in the planning process. Additionally, the Collaborative Systemwide Monitoring and Evaluation Project (CSMEP) is developing integrated, alternative designs for fish population status/trend monitoring and for hatchery, habitat, hydro, and harvest action effectiveness monitoring.

Consultation Process

Your recent decisions have highlighted the need for greater clarification in the Fish and Wildlife Program for roles, responsibilities, and process details of how projects should be selected and implemented to optimize benefits to the fish and wildlife populations

Mr. Delwiche, BPA

May 17, 2007

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affected by the Federal Columbia River Power System. We hope that the upcoming NPCC's Program amendment process will address many of the current deficiencies in expressing biological priorities and funding responsibilities that you have referenced in your letter. As expressed to your agency in our April 4, 2007 letter (attached) to Steve Wright and Tom Karier, CBFWA is implementing an amendment strategy to address the missing elements within the current Fish and Wildlife Program.

Finally, the fish and wildlife managers appreciate the fact that BPA representatives have met with us individually to address funding priorities within our geographic areas; however, there are several projects that have had their funding reduced that support regional collaborative efforts. These projects do not have a single champion to usher through funding support. CBFWA will be providing funding recommendations for these projects in the near future and hope that BPA will give our recommendations proper consideration.

We provide these comments in support of a more effective effort by the region to work together to rebuild and strengthen the future project selection process through the upcoming amendment process. Your expression of criteria for project selection is a step in that direction. We need to continue discussions to insure that the views of the fish and wildlife managers and others in the region are incorporated into a regionally accepted set of criteria for implementing project selection in the future.

If you have questions regarding this letter, please contact Brian Lipscomb at (503) 229-0191. We look forward to working closely with you as we improve and update our information to support an amendment to the Fish and Wildlife Program at the end of this year.

The NOAA Fisheries' representative to CBFWA abstained from taking a position on this action.

Sincerely,



Larry Peterman, Vice-Chair
Columbia Basin Fish & Wildlife Authority

cc: CBFWA Members
NPCC Members
Steve Wright, BPA

Attachment



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April 4, 2007

Tom Karier, Ph.D., Chairman
Northwest Power and Conservation Council
705 West First Avenue, MS-1
Spokane, WA 99201

Stephen Wright, Administrator
Bonneville Power Administration
905 NE 11th Avenue
Portland, OR 97232

Dear Dr. Karier and Mr. Wright:

The Columbia Basin Fish and Wildlife Authority's (CBFWA) Members are currently refining and summarizing management objectives for fish and wildlife populations in the Columbia River Basin. The Members intend to provide this information as recommendations to the Northwest Power and Conservation Council (NPCC) during its call for amendments to the Columbia Basin Fish and Wildlife Program (F&W Program). The CBFWA Members will submit their recommendations so the NPCC can respond to the Northwest Power Act requirement that the F&W Program be consistent with the existing plans of the fish and wildlife managers.

The CBFWA's recommendations for management objectives will build on and improve the existing F&W Program, including the NPCC's 2000 Program, 2003 Mainstem Amendment, and Subbasin Plans by refining existing objectives and providing the linkage between subbasin level objectives and regional scale goals. The recommendations will also incorporate goals and objectives contained in recovery planning, existing Federal Columbia River Power System (FCRPS) biological opinions, US v. Oregon agreements, the Pacific Salmon Treaty, and the Clean Water Act.

The fish and wildlife managers, working with their local and regional partners, will develop and recommend to the NPCC a framework for the F&W Program that is consistent with and incorporates, as appropriate, critical elements in state and tribal fish and wildlife management plans, recovery plans, and biological opinions. During the next several months, the fish and wildlife managers will collaboratively work with others to refine the definitions for focal populations, biological objectives, and determine how best to express limiting factors, strategies and actions at the population scale. This framework will explicitly integrate existing data management systems for comprehensively managing population/subbasin-scale information and ensure that objectives are expressed in common and consistent terms across the basin.

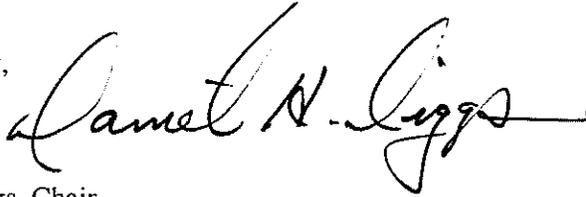
Pending regional agreement on management objectives and the set of critical factors limiting our success, the managers intend to develop strategies and actions necessary to successfully protect, mitigate, and enhance fish and wildlife populations in the Columbia River Basin. We anticipate including these strategies and actions in the set of recommendations the fish and wildlife managers submit to the NPCC during the proposed

Dr. Karier, NPCC
Mr. Wright, BPA
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amendment process in 2007. Through that process, specific BPA responsibilities can be defined and funded.

It is the fish and wildlife managers' intent to work closely with our local and regional partners to ensure our efforts incorporate their input, garner their support, and build on their existing activities. Through collaboration and partnering we can ensure an amended F&W Program is comprehensive and is implemented based on a thorough understanding of linkages and obligations as called for by the Northwest Power Act.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Diggs". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dan Diggs, Chair
Columbia Basin Fish & Wildlife Authority

cc: CBFWA Members
NPCC Members
Greg Delwiche, BPA