



UPPER SNAKE RIVER TRIBES FOUNDATION, INC.

413 W. Idaho Street, Suite 101, Boise, Idaho 83702

(208) 331-7880

June 26, 2015

Ms. Kendra Coles
Northwest Power & Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204

Re: Comments Regarding the June 22, 2015, Fish and Wildlife Draft Cost Savings Methodology

Dear Ms. Coles:

The Upper Snake River Tribes (USRT) Foundation is composed of four Indian tribes of the Upper Snake River region in Idaho, Nevada, and Oregon: the Burns Paiute Tribe, Fort McDermitt Paiute-Shoshone Tribe, Shoshone-Bannock Tribes of the Fort Hall Reservation, and Shoshone-Paiute Tribes of the Duck Valley Reservation. While the members of USRT currently reside within the Upper Snake River region, their aboriginal areas of use extend far beyond the region in all geographic directions. The four tribes have common vested interests to protect rights reserved through the United States Constitution, federal treaties, federal unratified treaties (including but not limited to the Fort Boise Treaty of 1864, Malheur Treaty of 1864, Bruneau Treaty of 1866, and Long Tom Creek Treaty of 1867), executive orders, inherent rights, and aboriginal title to the land, which has never been extinguished by USRT member tribes. USRT works to ensure the protection, enhancement, and preservation of the tribes' rights, resources, cultural properties, and practices and that they remain secured. These include but are not limited to hunting, fishing, gathering, and subsistence uses.

The Upper Snake River Tribes Foundation is pleased to provide these comments on the Northwest Power and Conservation Councils (NPCC) cost-savings methodology for fish and wildlife projects.

You may contact Bob Austin, bob@usrf.org, USRT Fish and Wildlife Program Director, at (503) 880-8164 (cell) or Heather Ray, USRT Executive Director, at (208) 331-7880 (office) or (208) 608-4131 (cell) or heather@usrf.org should you have any questions following review of these comments.

Sincerely,

Bob Austin
USRT Fish & Wildlife Program Director

Fish and Wildlife Program Cost Savings Alternative Process

USRT recommendation

June 26, 2015

An alternative process would be to consider that this proposed, highly contentious, time intensive, somewhat arbitrary, cost-savings process as described in the NPCC draft memo, be dropped from further consideration. We recommend replacing this methodology with a request to BPA that they designate a non-specific placeholder for new priorities in the currently available fish and wildlife program-planning budget. This would **not be a request for additional funding** beyond the already specified program budget and revenue requirement levels forecast in BPA's current rate case. Due to a lag in fish and wildlife project implementation and spending, for a wide range of reasons, BPA plans each year to "implement" more than the allocated BPA fish and wildlife budget with the goal that they actually accrue most all of the available budget planned for that fiscal year. Currently, as we understand their budget planning process, if BPA determines near the end of a fiscal year that they may underspend the budget, they can quickly decide to fund already approved and implementation ready fish habitat or wildlife focused property purchases, funding commitments in an MOA or Settlement Agreement, prior to the end of the fiscal year to make up the spending difference - up to and not exceeding the total budget available for that fiscal year.

What budget amount to recommend for an undesignated placeholder for new priorities is an open question. We understand that the NPCC had at one time recently asked for a \$3M or 1% amount of the fish and wildlife budget as a starting point to set aside for new fish and wildlife program priorities as per the newly adopted NPCC Program in 2014. Based upon the extent of new priorities in the 2014 Fish and Wildlife Program, that amount may be a worthwhile starting point to consider, beginning with a lesser amount the first year, ramping up to the full amount within 2-3 years. This approach recognizes that new priorities always take some time to develop the specific and detailed statements of work, budgets and schedule, as well as allowing for time needed for an ISRP and NPCC review and recommendation, prior to any project funding by BPA.