



Oregon

Kate Brown., Governor

Department of Fish and Wildlife
Ocean Salmon & Columbia River
Program
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Mr. Tony Grover
Fish & Wildlife Division Director
Northwest Power and Conservation Council
851 SW Sixth Avenue, Suite 1100
Portland, OR 97204-1348

Dear ~~Mr. Grover:~~ *Tony*

On behalf of the Oregon Department of Fish and Wildlife (ODFW), thank you for this opportunity to comment on the Fish and Wildlife Draft "Methodology to Identify and Review Projects for Cost Savings." The document describes a new process by which the Northwest Power and Conservation Council will identify and review projects for potential close-out or significant cost reduction, in order to redirect funding for new or other projects.

The ODFW supports identifying additional funding to pay for emerging program priorities. In particular we endorse providing funds for long-term maintenance of program assets, implementing adaptive management (including prioritized research on critical uncertainties) throughout the program, implementing additional sturgeon and lamprey measures, and continued efforts to improve floodplain habitats.

We also appreciate the commonsense of identifying cost savings from projects that are closing out, where efficiencies can be found, or where the benefits to the resource are low. Unfortunately the draft memo describes a new process that is time consuming, that will likely place an undue burden on projects that fall outside of the Federal Columbia River Power System Biological Opinion Reasonable and Prudent Alternatives (FCRPS BiOp RPAs) or Fish Accords, and that seems duplicative to the program budget tracking and reporting that Bonneville Power Administration (BPA) already employs. The Council's Fish and Wildlife Program already has processes in place for project selection and review that are rigorous and require a significant time investment by sponsors. Once projects are reviewed and recommended for funding, the measures they are based on have already been reviewed for cost effectiveness and nexus to the FCRPS. In addition, the process described in this document identifies a working group that is too restricted and does not encompass needed expertise from fish and wildlife managers regarding specific projects and project outcomes. Finally, project close outs are not common, thus the described quarterly review period is too frequent, and 14 days is inadequate for project sponsors to respond after receiving notification of review. The proposed process will create additional administrative obligations and has little chance of finding significant funds for new priorities.

Due to a low chance of finding significant savings relative to the administrative burden placed on project sponsors, we recommend that this proposal be dropped from further consideration. As an alternative, we suggest that the Council request BPA to designate a placeholder for new priorities in the currently available fish and wildlife program-planning budget. At this time, this is not a request for additional funding beyond the program's budget and revenue requirement forecasts in BPA's current rate case. This alternative is consistent with the ongoing procedures BPA has described to identify and reallocate unspent funds near the end of a fiscal year. For a variety of reasons, many projects that BPA has contracted are underspent each year. Now, BPA uses this end of year savings to fund approved and ready property purchases, as well as appropriate commitments in Memorandums of Agreement and Settlement Agreements. This enables BPA to fully spend, but not exceed, the fiscal year's budget. We suggest adding appropriate items from program's emerging priorities to BPA's 'approved and ready' list of acquisitions.

Thank you again for this opportunity to comment. We look forward to working with you to efficiently and effectively implement the Fish and Wildlife Program to protect, mitigate and enhance Columbia River Basin fish and wildlife resources.

Sincerely

A handwritten signature in blue ink, appearing to read "Tom Rien".

Tom Rien
Columbia River Coordination Program Manager

cc: Bill Bradbury (Oregon Council Member; Fish and Wildlife Committee Chair)
Henry Lorenzen (Oregon Council Member)
Karl Weist (Oregon Council Staff)
Richard Whitman (Oregon Governor's Natural Resource Office)
Curt Melcher (Director, ODFW)
Ed Bowles, Chris Kern, Bruce McIntosh, Bruce Eddy, Steve Marx (ODFW)