

Coles, Kendra

Subject: FW: Wildlife O&M Comments

From: Kelly Singer [mailto:kellys@spokanetribe.com]
Sent: Thursday, February 22, 2007 12:57 PM
To: O'Toole, Patty
Cc: 'Billy Joe Kieffer'
Subject: Wildlife O&M Comments

Dear Patty,

I am providing comments on the February 1, 2007 Request for Comments from the NPCC on the Wildlife O&M costs and the use of BPA's PISCES database for comparing regional Wildlife Expenses. I feel that PISCES is an extremely beneficial tool that continues to improve the monitoring of contracting, program expenditures, and tasks that are being completed by project sponsors. There are still many issues that need to be worked out before it can be used to analyze project costs across the Columbia Basin for Wildlife Mitigation Program or the Program in general.

Some Wildlife information that is currently being presented is not completely accurate. The acreage being managed with the Spokane Tribe Wildlife Mitigation Project is currently at 4377 acres, not the 4247 that was identified by BPA. Also the Tribes Wildlife Mitigation Program continues to attempt to consolidate Wildlife Mitigation lands on the Spokane Indian Reservation to manage larger tracts versus checker boarded small tract to improve management efficiencies of the project.

My major concerns with the analysis of the PISCES data review have to do with how projects expenses were categorized and comparing agency costs across the board. Work elements were automatically placed in certain Work Categories for this review, but certain work elements can be used for multiple categories depending on the goal of the work. For instance, prescribed burning was categorized as an enhancement, but is often used as a maintenance tool for multiple habitat types. "Remove Vegetation" was classified as enhancement, but I use remove vegetation as a work element for mowing access roads of Wildlife lands to reduce fire hazards during summer months. It is not an enhancement, but a method of operation to protect the habitat from wildfire concerns. The way that costs are identified within work elements vary considerably among individual project managers (some more accurate than others).

I do not feel that the PISCES data is adequate to compare project costs between sponsors to see which projects are cost effective. To use PISCES data to compare sponsor cost to each other, all staff salaries would need same, agency indirect the same, activities spec's the same, equipment costs the same, supply costs the same, and etc. Example of spec differences; Agency 1: builds 3 strand fence with 25' post spacing, while Agency 2; builds 4 strand fence with 12' post spacing. PISCES doesn't show the higher spec's that Agency 2 uses. PISCES costs are just that, "estimates". True costs are typically identified in the Annual Report of the Project.

If you have any questions, please contact me to discuss these issues.

Thanks,

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