

**The following comments pertain to corresponding issues of Document 98-25
"Discussion of Issues Raised by the ISRP Report on the FY 1999 Project Selection
Process".**

1. "Inadequate Project Proposals:"
 - As the ISAB has previously noted, the heart of this issue is that the projects presently define the Program instead of the Program clearly defining projects for implementation. Until the region has an agreed-upon a framework, this problem is likely to persist.
 - Having BPA staff work with the contractors to address the ISRP comments for each individual FY99 project is probably the most interim procedure until the region adopts a framework. However, in order for us to successfully address these concerns, we will need clear programmatic guidelines from the Council. We will then document how we have addressed the ISRP's technical comments through the contract negotiation process. This additional workload also has staffing implications for BPA. While we will continue to use existing staff as effectively as possible, the substantial increase in project-related issues, and additional communication with Council staff, CBFWA caucuses, and contractors may require additional staff.

2. "Changes in Priority for 9 Projects;"
 - This again points to the desirability of having CBFWA recommendations presented as a list of projects in order of priority, rather than an undifferentiated list of projects recommended to be funded. Such a list would allow the Council to make recommendations, such as selecting some of all of these projects for funding, in a manner that least disturbs the interests of the CBFWA members..
 - Of the three alternatives offered, our preference is to have CBFWA make room to fund the projects on this list that the Council recommends for initial funding or continuance in FY99.
 - We suggest the Council contact the ISRP for further information about what priority they believe should be given to these projects, or about why the panel recommends that these projects should go forward rather than others recommended by CBFWA.

- 2a. "Funding for Development of Program Framework:"
 - Funds in the Direct Program are intended to cover the costs of those fish and wildlife projects directly funded by Bonneville. Prior "framework" costs, such as those for the Multi-year Implementation Plan have been Direct Program costs, and the current framework effort is appropriately part of this category. Although the list of projects proposed for Direct Program funding is larger than the funds available, and thus funding the framework may mean some other projects are displaced, the need for a framework is clearly of such a priority that it should be given funding precedence this year.
 - As a complement to the program framework, Bonneville recommends that the Council formally endorse the concept and importance of an information structure

which would include policy, programmatic, and scientific framework elements. Bonneville agrees with the ISRP that the data coordination, data management, and data use issues need to be addressed in a more coherent and comprehensive way. The Council program already recommends a data structure centered on the Streamnet project, and we will be working with Streamnet and others to address these issues more fully..

3. “Deferring Conclusions on Artificial Production Projects until Comprehensive Review is Completed:”
 - Since the ISRP is making no present recommendations on these projects, we believe that it is reasonable to continue these projects, subject to the "three-step process" adopted in FY1998. However, we also believe that completing on schedule the comprehensive review of artificial production, and squarely addressing the policy questions raised in that review is an essential prerequisite to funding of these or any other artificial production projects beyond FY1999.
- 3a. “Resident Fish Substitution:”
 - Presently accepted mitigation is consistent with the resident fish substitution policies in the current Council Program.
 - The programmatic issue raised by the ISRP needs to be addressed in the framework. However, it is worth noting that most, if not all, of the resident fish substitution projects are in habitats that are not open to anadromous fish, that already have been considerably disturbed or modified, and for which the managers have already made clear policy determinations.
4. “FY99 Watershed Projects:”
 - We favor the approach of having proposed projects address the six criteria put forth by ISRP.
 - The definition of what constitutes "watershed assessment" may differ between ISRP, CBFWA, and others. It would be useful to have an informal regional effort (a meeting or two, not a new process) to better define what constitutes a watershed project as well as the components of a watershed assessment.
 - While we agree that preparing a good assessment is an essential foundation for restoration of a watershed, we believe that a number of watersheds already have such assessments by other names or substantial work completed that could be used to create such assessments. We therefore believe that, in most cases, the assessments can be completed in reasonable time, and that FY1999 projects should continue into implementation, guided by the ISRP criteria, while the assessments are being completed.
5. “Recommendation for Law Enforcement Funding:”
 - Protection of returning adult salmon is especially vital, since only a few percent of the juvenile fish that reach the estuary survive to return as adults. Prior studies, as well as new information from the limited radio tag study conducted in Zone 6 for part of 1997, suggest that there is relatively little illegal harvest and imply that the

expanded law enforcement effort has had a beneficial effect. Bonneville recognizes the difficult policy issues involved in last year's decision not to continue funding law enforcement, and supports the Council's conclusion that other entities, such as state-funded fish and wildlife programs, have an interest in and responsibility for assuring that illegal harvest is held to a minimum. However, particularly in the instance of tribal law enforcement, where additional funding sources are not readily available, Bonneville encourages the Council to take a close look at the potential benefits for protection of adult salmon if supplemental funding of tribal law enforcement is resumed.

6. "Treatment of Non-Discretionary Projects:"

- Refer to July 27, 1998 email to Doug Marker documenting accomplishments of 1998 non-discretionary projects, including rationale with obligated and expensed funds.
- It is unlikely that independent assessment and decision support projects such as these will ever be fully acceptable via the consensus process. Nonetheless, these are support activities that Bonneville relies on, often in lieu of adding additional in-house staff, to provide the information and analysis used to make ESA assessments, make operating decisions, and consider alternatives for meeting its legal obligations within the region. We continue to welcome regional comment on the need for and cost of these projects and will take that comment into account in determining how to proceed with these projects. However, this is a decision on which the recommendations of the Council and others will be valued, but the final determination must be based on Bonneville's assessment of how to best meet its statutory obligations as a federal agency.
- ISRP comments to specific projects are addressed in separate attachments hereto.

7. "Biological Studies of Gas Supersaturation:"

- These studies are related to the 1999 NMFS decision on the Lower Snake River dams. Both ISAB reviews, of the DGT research plan and of Corps of Engineers' Gas Abatement Program, need to be completed in time to contribute to 1999 Snake River decision process.

8. "New Research Lamprey Projects:"

- We agree with the Council's recommendations about collaborative review (ongoing with proposed) before initiating additional work in this area.
- Proposals submitted by OSU and USGS to the Corps of Engineers for 1999 funding and the 1999 proposals submitted for funding from the Direct Program have overlap that needs to be addressed to avoid duplication.

9. "Coordination Funding:"

- Bonneville agrees that reasonable coordination activity is an appropriate Direct Program expense. However, the coordination funding proposal raises several issues that should be resolved before separate funding of coordination activity takes place. One is the potential overlap between coordination activity and funding provided

under individual projects for administration and coordination. It appears that, in a number of instances, the budgets for individual projects already contemplate a degree of coordination activity, and provide for it (although not necessarily by that name.) Another is the current overhead or "indirect" charges for tribal, state, and federal agency administrative costs. These costs are already substantial and are increasing. While the computation of these charges varies from agency to agency, it is arguable that some coordination activities are already being funded by such charges. A careful review of indirect charges therefore needs to be completed before a final decision is made on coordination funding. Finally, if coordination funding is provided for agencies and tribes and is not extended to other project proponents, there may be some difficult equity issues. Other individuals and entities also submit project proposals, and doubtless would want to be reimbursed for time and travel expenses relating to the presentation and defense of their proposals if states, tribes, and federal fish and wildlife agencies are getting additional funding for this purpose.

10. "Budget Management Issues:"

- Bonneville has met with CBFWA staff and provided its best available information regarding these amounts. However, as indicated in that meeting, it is not possible to make any guarantees of the exact amounts that will be paid as interest on unspent funds, or as unspent carryforward from FY1998, until 2-3 months after the close of the fiscal year. In addition, as indicated at that meeting, the CBFWA budget did not include the budget necessary for certain non-discretionary projects, nor did the estimates take into account either the FY1998 funds used to initiate the framework process or FY1999 funding needs for the framework process.
- For these reasons, Bonneville believes that there is some uncertainty about the total amount of funding that will be available and that some form of explicit prioritization would be very useful as the FY1999 budget is assembled. This will allow most projects to proceed in the face of this budget uncertainty, while those that are closest to the limit of the budget can be funded as money becomes available within the budget and from the closeout of the previous fiscal year.

11. "Protection and Enhancement of Mainstem Habitat:"

- The scope of "mainstem" needs to include the estuary and nearshore ocean influenced by freshwater.
- Efforts should be included to enhance salmon protection in the estuary, such as further support to the effort to reduce predation by birds, as well as efforts to reduce pinniped predation and experiments to improve estuary acclimation. .

12. "Earmark Budget for Innovative Work:"

- Bonneville agrees that a earmarked budget for innovative projects would be a very valuable addition to the program. It is particularly important since very few new projects are otherwise likely to be funded, given the high percentage of the budget that is given over to continuing funding for existing projects. For FY99 some of the innovative project proposals identified by the ISRP are ready to go and should be

given some initial seed money.

- Suggested candidates include: Proposal No. 9047, Use of Unsteady Flow to Aid Mainstem Passage of Juvenile Salmonids (pulsing proposal: 95-98 BO includes RPA that region/NMFS will explore developing proposal to pulse flows; has not been done to my knowledge although NMFS may have given it some attention?). Proposal No 9136, Influence of Marine-Derived Nutrient Influx on CRB Salmonid Production: Recent recognition and application of importance of nutrients contributed by salmon escapement to production have resulted in nutrient addition programs up and down the Pacific coast (Washington & Canada) where spawners have been depleted. Transfer of learning from early October 1998 AFS-Wakefield symposium on importance of salmon nutrients to ecosystem production provides opportunity to apply learning to at least initiate some scoping work for application to enhance egg-parr-smolt production of wild listed chinook and steelhead Columbia stocks which could contribute to increased SAR.
13. “Wildlife Program Recommendations:”
- We agree with the ISRP recommendations that an M&E component be accommodated in Wildlife projects. Dr. John Skalski has been approached by the wildlife group and has talked to staff about developing some improved M&E tools. The wildlife group want to improve the tools so that they can better evaluate the effectiveness of their programs and we support this effort.
14. “Funding for the Columbia River Basin Bulletin:”
- The CBB appears to be a valued information source within the basin. The coverage is timely, accurate, and has a good level of relevance and detail. We would support continued funding for this effort.
15. “Reform of Project Review Process:”
- 15a. Program reviews/multi-year approval -- grouping projects into umbrella programs for review and multi-year approval recommendations
- We concur with the recommendation to have new projects implemented via an open solicitation process.
 - We support the ISRP theme of establishing umbrella programs if:
 - a. ISRP review of the aggregate is assured.
 - b. Adequate technical peer review of the individual project, of the aggregate, and of the Program is assured.
 - c. Recommended improvements and changes can be achieved and not compromised by advocacy and/or political positions.
 - d. Only projects of similar function are grouped.

- e. Grouped projects will not materially change during lifetime of grouping or significant changes in scope, process, etc. will involve review.
 - f. Projects with outstanding deliverables that are substantially behind schedule are ineligible.
 - g. Peer-reviewed project management plans will be required and will be complete with detailed objectives, tasks, milestones, reporting mechanism, etc.
 - h. Performance will be reviewed at least annually.
- Implementation might include Council drafting of overlying scope documents, BPA contractual aggregation of projects, and project sponsors joint preparation of scopes of work, project management plans, etc. Aggregation could be by basin with selected basins as prototypes.
- 15b. Additional ISRP recommendations for improving the project selection process/reporting of results and adaptive management improvements
- We do not support reordering of the CBFWA-ISRP-Council review sequence.