

Burns Paiute Tribe

Fish & Wildlife Department

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February 7, 2007

Patty O'Toole
Program Implementation Manager
NPCC Fish and Wildlife Division
851 SW Sixth Ave., Suite 1100
Portland, OR 97204

RE: IEAB review of wildlife O&M costs.

Dear Patty O'Toole,

Thank you for the opportunity to comment on the proposed IEAB review of project budget information in the PISCES database.

The Columbia Basin Fish and Wildlife Authority, Wildlife Advisory Committee (WAC) has discussed this topic in length and is currently preparing a response to the proposed IEAB task #116. As stated in the Council's letter, characteristics of land parcels are different; however many other factors are involved in cost variations for similar activities between projects. We look forward to sharing our detailed analysis of cost variation through our involvement with the WAC in the near future. The Burns Paiute Tribe (BPT) does not believe standardizing operations and maintenance (O&M) costs for similar activities can be achieved.

More specifically, the Council's letter seeks response to the PISCES information and its usefulness in the review process. We do not feel PISCES data is accurate enough to conduct a thorough analysis. First, the budget information supplied includes the performance period of October 2005 – September 2006. Budget information was not required for the two BPT properties during the period of October 2005 – December 2005 and therefore the budget review does not reflect a full annual performance period. Second, when providing work element budget information in the PISCES database, the information is an estimate derived once the activity is completed. We hope costs are accurately assigned to the corresponding work element but without more time spent tracking daily activities these costs may be incorrectly stated. Third, Bonneville Power Administration (BPA) and WAC have been unable to completely agree on which activities should be categorized as enhancements or as maintenance. This information should be reviewed prior to an analysis of O&M costs. Finally, comprehensive work

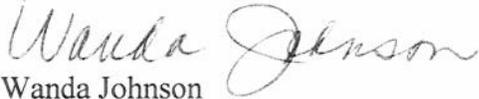
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element definitions are at times lacking. For example, project administration costs clearly include submitting BPA funding package requirements and managing on the ground efforts. However, it is unclear if time spent with coordination activities, dealing with personnel issues, budget tracking and analysis, signing of lease agreements and others should be included. We believe including these items has raised our project administration costs above those of other entities and makes comparison between projects difficult.

We have verified that the acreage reported by BPA is accurate.

We urge you to consult with the wildlife managers and CBFWA through the remaining cost analysis procedure. We will continue to work with the WAC to further communicate the cost effectiveness of our programs. Thanks again for the opportunity to comment.

Sincerely,


Wanda Johnson
Tribal Chairwoman