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September 1, 2026

**MEMORANDUM**

**TO:** **Fish and Wildlife Committee Members**

**FROM:** **Mark Fritsch, Maureen Hess, Heather Hendrixson, and Kris Homel**

**SUBJECT:** **Staff Recommendation on the 2026 Lands project review**

**PROPOSED ACTION:** Staff is seeking the Committee's support of the draft recommendations as part of the 2026 Lands Project Review, as outlined below (parts 1 – 3). The intent is to take these recommendations to the full Council for approval in October 2026, which would then be transmitted to Bonneville and project sponsors.

**SIGNIFICANCE:** Section 4(h)(10)(D) of the Northwest Power Act directs the Council, with the assistance of the Independent Scientific Review Panel, to review projects proposed for funding by the Bonneville Power Administration to implement the Council's Fish and Wildlife Program. Under this section of the Act, the Council makes final recommendations to Bonneville on projects to be funded through Bonneville's fish and wildlife program budget. A reminder that Section 4(h)(10)(A) of the Northwest Power Act requires Bonneville to use its fund and authorities to protect, mitigate and enhance fish and wildlife in a manner consistent with the Council's Fish and Wildlife Program.

**BUDGETARY/ECONOMIC IMPACTS**

The average annual project budget (Fiscal Year 2022-2026) for the 29[1] projects reviewed totals approximately $20,723,643 based on Bonneville's records (Table 1a), addressing approximately 370,000 acres across this suite of projects.

**Recommendations in three parts:**

Part 1: Background, Review Summary, and Council Considerations and Expectations

Part 2: Policy Issues and Recommendations

Part 3: Summary of Project Recommendations

# Part 1: Background, Review Summary, and Council Considerations and Expectations

## Background

Since the addition of Section 4(h)(10)(D) to the Northwest Power Act in 1997, the Council has developed and conducted reviews of projects directly funded by Bonneville that are implemented to protect, mitigate and enhance fish and wildlife under the Act. These rigorous reviews have resulted in clear documentation of each project's purpose, objectives, and results; project improvements through independent scientific review and feedback; improved sharing of project data and information; increased transparency and accountability; and the identification of project contributions to the Council's Columbia River Basin Fish and Wildlife Program (Program) and to the region.

Most projects implementing the Program have been reviewed and recommended by the Council numerous times. As such, their basic premise and scientific soundness have been accepted. The Council, with input from the region's fish and wildlife managers, the ISRP, and Bonneville, developed a revised approach to the review process for these existing and ongoing projects. This revised approach streamlines the process in recognition of the effort invested in previous reviews and the maturity of the direct-funded projects, while continuing to meet science review requirements as directed by Section 4(h)(10)(D) of the Northwest Power Act. The updated review

[1] This excludes six projects that administratively support other lands projects and are not reviewed (see Table 1b). Staff usually report only the current fiscal year project budget, however various funding mechanisms can impact year-to-year budgets (e.g., Bonneville's recent shift to 2-year contracts for some projects, portfolio management, agreements). Therefore, staff summarized the recent 5-year average annual project budget reported in CBFish to better reflect the general magnitude of funding dedicated to each project.

process was described in detail during the following Council and Fish and Wildlife Committee meetings: May 2023, October 2023, and May 2024.

The guiding principles of this revised project review process include:

- Review serves as an implementation check-in on project actions
- Reduced review materials necessary for submission (i.e., prior project proposals and review materials serve as the base information)
- Focused on the review of discrete sets of projects
- Advanced clarification on how projects may participate in the review process prior to initiation
- Value-added interaction, comments, and guidance provided by the science panel to strengthen projects for continued implementation

This Lands review represents the first set of existing and ongoing projects selected to undergo review using the updated approach. These projects were selected based on time since the last review (which was the 2017 Wildlife review in most cases); alignment to other Council work (i.e., Asset Management Strategic Plan[2]); project mapping for purpose and emphasis areas based on type of work implemented (i.e., Habitat, Restoration/Protection – Wildlife and Fish Lands Acquisition, O&M, RM&E); and their ability to contribute necessary information towards Program Performance assessments[3]. There are 35 projects funded through the Program that were identified for this review. Of those, 29 were noticed to participate in the review process. One of the 29 was a new start, so the proposal was sent to the ISRP separately. It was recommended by the Council in May 2026 and is included in the group of 29 projects[4]. The remaining six projects provide administrative support to the relevant projects and are not formally reviewed by the Council (Table 1b).

The 29 reviewed projects primarily focus on land management activities on land either acquired through Bonneville funding and/or on land acquired by other entities for which Bonneville provides Operations and Maintenance (O&M) funding to support basic protection efforts to benefit fish[5] and wildlife[6]. Basic land management activities or O&M mostly involves work to (1) manage vegetation, (2) maintain boundaries, roads, fences, and gates, (3) manage access and land use, and (4) conduct compliance monitoring to ensure these lands are staying at or above

[2] Council approved this plan on October 10, 2018, to ensure the longevity and integrity of the Program's past investments associated with hatcheries, fish screens, and lands.
[3] Council staff are working to identify Strategy Performance Indicators on wildlife lands and to track progress toward achieving Wildlife Program goals. Both tracking efforts would benefit from information gained through project sponsor review materials and results.
[4] Project # 2024-004-00, *Upland Wildlife Habitat Management*
[5] Those lands purchased and/or enhanced as mitigation through the Program to benefit aquatic focal species are termed "Fish Lands."
[6] Those lands purchased and/or enhanced as mitigation through the Program to benefit wildlife focal species as mitigation for losses attributable to construction, inundation, and operation of the federal hydrosystem, are termed "Wildlife Lands."

baseline conditions determined at the time of acquisition. These O&M activities do not generally require additional science review in the same way that projects conducting research, monitoring, and evaluation or large-scale habitat restoration projects do. In addition, for these previously reviewed projects, the Council has accepted their basic premise and scientific soundness. Therefore, the Council did not request another review by the ISRP at this time.

It is important to also note that the projects in the Lands review represent a subset of the habitat protection efforts associated with the Program. There are other land parcels associated with projects that are outside of this Lands review, where Bonneville funds are used to acquire and maintain land as part of settlements, but the project is primarily focused on *restoring* habitat for both fish and wildlife (i.e., project mapping: Habitat Restoration/Protection). These habitat restoration/protection projects, although they sometimes occur on Bonneville- acquired land, are not part of this review because they are primarily focused on stream habitat restoration that typically occurs at a larger scale, often requiring prioritization tools for implementation, planned restoration with proposals, and occurring only once or at most infrequently.

Prior to initiating the Lands review, instead of asking project sponsors to immediately develop a project proposal as was done in previous reviews, the Council staff compiled existing information about each project through prior review materials, annual reports, and the land parcel data displayed in the Lands Program Tracker. From this suite of information, staff developed a summary and a targeted list of project-specific questions to check in on and confirm each project's actions, accomplishments, challenges, progress toward meeting objectives, and future planning. For the projects with associated land parcels, staff also developed parcel-specific questions to confirm and/or correct information and data such as parcel location and number of acres protected. These types of focused questions assisted staff efforts to improve data and information accuracy for Program Performance reporting. The targeted list of questions also asked if sponsors had questions for the ISRP or were interested in more project-specific ISRP guidance.

The Lands review was originally scheduled to begin in Fall 2024. Based on concerns about the overlap in timing with the Council's Fish and Wildlife Program amendment process that were expressed by fish and wildlife managers, the review was deferred to Fall 2025.

On November 6, 2025, Council staff initiated the review by sending guidance and instructions to the managers and sponsors of the Lands projects with a deadline of Feb 13, 2026. Following that deadline, Council staff made the materials received available to the ISRP and on the Council's website on March 30, 2026. The Council did not request additional ISRP review for all of the individual projects. Based on the emphasis of one project's focus to monitor and evaluate restoration activities and results on mitigation lands, the Council asked the ISRP to review the project # 2008-007-00, *Upper Columbia United Tribes (UCUT) Monitoring and Evaluation (M&E) Program*. In addition, there were 12 projects that requested specific guidance from the ISRP.

From April - July 2026, Council staff continued reviewing materials received and coordinated with project sponsors on any remaining clarifications related to project and parcel-level information. Additional coordination and discussion with Bonneville staff also occurred to better understand how Bonneville tracks acreage acquired through various acquisition types (e.g., fee-title, conservation easement, leases), details on specific land parcels (e.g., confirm acreage, clarity on O&M funding, data discrepancies), clarify when land management plans are required or acknowledged by Bonneville, and discuss challenges and opportunities for improving data and information accuracy to be able to track habitat protection efforts through the Program.

## ISRP Review summary

As noted above, the scope of the ISRP review was different from past reviews, and a full review of all projects was not requested by the Council with one exception. The Council asked the ISRP to fully review the *Upper Columbia United Tribes (UCUT) Monitoring and Evaluation (M&E) Program* and respond to twelve projects that requested ISRP guidance. The ISRP report was received on June 26, 2026 (ISRP document 2026-4)[7] and included the full review of the UWMEP project, six programmatic comments intended to benefit all projects, and specific responses for the projects requesting guidance.

## Council Considerations and Expectations

The Council considers the ISRP report and public review comments in making final recommendations on projects to Bonneville. Consistent with the Northwest Power Act, the Council also considers the "impact of ocean conditions on fish and wildlife populations" to the extent appropriate for this review and determines "whether the projects employ cost-effective measures to achieve program objectives," as detailed below, when making recommendations.

**Ocean conditions:**

The Northwest Power Act requires that the Council, in making its final recommendations, consider "the impact of ocean conditions on fish and wildlife populations". While Congress provided no other guidance as to the meaning of this consideration, the Council's Program recognizes the ocean environment as an integral component of the Columbia River ecosystem and acknowledges the importance of understanding the conditions anadromous fish face in the ocean to help the region identify factors most critical to survival, growth, and viability. Measures in the Program support monitoring ocean conditions and in-river restoration actions to determine those actions of greatest benefit, to separate the effects of ocean-related mortality from that caused in the freshwater part of the lifecycle, and to assess salmonid survival and evaluate restoration potential recognizing that ocean conditions can be variable. In the 2026 Program, the Council called upon Bonneville, as it has for decades, to continue contributing to ocean research for the Program to ensure actions that generate information about the ocean are preserved as

[7] No public comment has been received to date.

part of the Program. The Program also supports the Ocean and Plume Science and Management Forum to encourage coordination and communication between ocean scientists and fish and wildlife agencies and tribes to explore opportunities to improve in river management activities based on information about ocean conditions. Therefore, taken together, the Council acting under the Program can consider ocean conditions in general and recommend funding for projects that support these measures. While we do not have sufficient information to directly match habitat actions to ocean conditions and identify those providing the greatest benefit, the Council's recommendation to continue implementation of the projects in this review is based on a reasoned premise linking these projects to ultimate improvements in restoring and maintaining healthy populations of fish and wildlife affected by the hydrosystem, taking into account variable ocean conditions.

**Cost-effectiveness:**

In making its final recommendations, the Act requires that the Council determine whether the projects employ cost-effective measures to achieve Program objectives. As with the ocean conditions consideration, Congress did not provide any further explanation or guidance as to the meaning of this provision. However, the provision itself does not require the use of a single measure of biological effectiveness as a basis for comparison, nor the use of strictly quantitative analysis. Further, the wording of the provision calls for a cost-effectiveness analysis only within projects, not necessarily a cost effectiveness analysis among and between projects. Based on the Council's work over the years to understand and develop an approach to determine whether any particular project employs the most cost-effective of possible alternative methods to meet its objectives, the Council has found that cost-effectiveness review drives toward procedures for review, selection, and management that emphasize efficiency and accountability in meeting project objectives. To improve the likelihood that projects recommended for funding are those that employ cost-effective measures to the greatest degree, the Council has identified several strategies, which include developing other elements of project review that also provide accountability benefits and assessing the effectiveness and evaluating the outcomes of existing projects over time. Further, in the 2026 Program (see Part Seven), the Council continues its commitment to regularly assess the performance of the Program and using what we learn about performance to improve implementation in a cost-effective manner. Specifically, the Council reiterated its commitment to ensuring that projects deliver cost-effective benefits to fish and wildlife and assessing program performance to this end. By conducting the Lands review the Council has acted consistent with the 2026 Program provisions and its strategies in making its recommendations in this review. Additionally, as an overarching policy direction, the Council is supportive of its staff efforts to identify and emphasize efficiencies and effectiveness improvements in the project review process.

**Duration of recommendations:**

The Council's recommendations are applicable to projects beginning on the date of this letter and remain applicable through the next project review, unless otherwise noted through other

processes that may occur outside of a project review (e.g., coordination with Bonneville staff through the Project Change Coordination Forum).

**Funding:**

The 5-year average (Fiscal Year 2022-2026) for annual project budgets as reported in CBFish is shown in Table 1a to reflect the general magnitude of the work being implemented through the suite of projects in this review. The 2026 Program emphasizes that Bonneville should provide funding to adequately implement the ongoing work of the Program, including adequate and dependable funding for annual and long-term operation and maintenance of the direct Program's assets. This also means providing inflation adjustment factors for projects. Projects held at or often below the rate of inflation struggle to meet their objectives and protect Program investments, as actual costs of projects have increased (labor, materials, etc.). The Council requests that Bonneville continue to report project and Program funding details for regional transparency, which is also important for the Council's efforts in tracking the implementation of the Program.

**Agreements and Accord Project Funding:**

The Council recognizes the financial arrangement of the agreements and accords that exist in the Columbia River Basin. The Council understands that Accord parties can shift funding within their accords between projects and between years to meet seasonal needs, expenses, priorities, etc. As with all Program projects, Bonneville has a Start of Year (SOY) budget for each accord and agreement-funded project for fiscal year 2026 and beyond, and the working budget may shift from Bonneville's SOY.

The Council also stated in the 2026 Program that it expects that cost management efforts are shared as equitably as possible over the entire Program. Bonneville's efforts to manage or reduce program costs can, at times, be imposed on a small proportion of the total range of projects funded to implement the program. The Council understands the value of the commitments made in long-term agreements and to that portion of the Program that addresses the needs of listed fish. On the other hand, the Program's core protection and mitigation activities are of equal priority under the Northwest Power Act and need to be treated equitably in program management, especially if proposed funding cuts begin to threaten the substantive work and ability to meet project objectives.

# Part 2: Policy Issues and Recommendations

Part 2 identifies policy issues associated with this group of projects and the Program. Staff recommendations for these policy issues are based on input received from the sponsors and the ISRP programmatic comments identified in its report. They may also address an issue that has been raised in the past and remains relevant for this review to address broader policy issues that underline or affect project recommendations and the Program.

The Council believes it is important that Bonneville's implementation and project managers, and project sponsors read the ISRP report, and the Council's policy-level and project-specific recommendations (Part 3, table 1).

## 1. Preserve Program Integrity

### A. Annual Operations and Maintenance (O&M)

Adequate annual and long-term O&M funding is needed to maintain the integrity of Program assets and maintain the mitigation values for which land was acquired or protected at or above baseline conditions. Adequate annual support for recurring operations and maintenance is critical to prevent higher costs for non-recurring maintenance and rehabilitation expenses (see policy issue and recommendation 1b).

Lands project sponsors identified several issues of concern regarding the adequacy of the annual support received from Bonneville for maintenance. Concerns include the increasing costs of labor, equipment, and supplies due to inflation; increased costs due to emergency repairs such as wildfire response, floods, and vehicle and equipment breakdowns; and ongoing weed management, especially the invasion of annual grasses following wildfire. In addition, to maintain operations, sponsors are tapping into other funding sources to meet their project needs such as Accord carry-over funding or non-BPA funding. While this may seem cost efficient, it actually indicates that the projects are unsustainable at their current funding levels and therefore unable to fulfil their mitigation role.

Another concern with current funding levels is that it generally only allows small-scale actions, while larger-scale efforts to address broader challenges to protection efforts like invasive species, wildfire, equipment or facility need,) are often not pursued because of funding shortages. As a result, there is a tendency towards using emergency efforts to respond instead of performing regular maintenance. Some project sponsors also identified issues with staffing limitations, which are closely tied to the adequacy of funding. Staffing limitations threaten the ability to conduct necessary maintenance, and it can be challenging to attract and retain staff in remote field locations.

In addition, some project sponsors noted that they are engaging in new land acquisitions and easements in different ways. One way is through a mitigation or settlement agreement that has a defined acreage target to achieve. Currently, these agreements also include a one-time stewardship payment for O&M. Past legacy mitigation parcels in the Program continue to receive annual O&M budgets. Another way is through a long-term funding agreement for land acquisition and annual contracts for O&M. In this case the annual O&M contract amount does not substantially change over time or with the addition of new parcels. This can be problematic because additional funds may be necessary to effectively maintain these assets and mitigation values on new parcels.

Recommendations: Maintain adequacy, stability, and continuity in annual O&M budgets which include staffing and on-the-ground work. Bonneville should implement an annual inflation adjustment factor that keeps pace with the cost of living and Program needs. The Council requests Bonneville work with the Council and project sponsors to identify when project budgets need to increase in response to inflation to preserve the substantive work of the Lands projects. If Bonneville funding is used to acquire new land parcels outside a one-time stewardship agreement, then the budget should be scaled to maintain the mitigation values for which land was acquired or protected. The Council encourages Bonneville to use one-time payments over annual contracts for O&M. This will allow sponsors the ability to better manage their funds and ensure long-term integrity of program lands.

**B. Asset management**

Adequate and dependable funding is critical for project management, especially for non-recurring asset management of these lands and the necessary supporting facilities and field equipment. This ensures that these past investments remain properly functioning to benefit fish and wildlife in the basin and meet their intended goals and objectives, as well as continuing to meet Bonneville's mitigation obligations.

Beginning with the 2014 Fish and Wildlife Program- and continuing through the 2026 Program, the Program included an investment strategy. Specifically, "*…long-term maintenance of the assets that have been created by prior program investments…*" was ranked the highest emerging priority in the 2014 Program. In response, the Council developed an asset management strategic plan[8] collaboratively with Bonneville to address non-recurring maintenance needs for hatcheries, fish screens, and mitigation lands to ensure longevity and integrity of the Program's past investments made for the benefit of fish and wildlife. The plan was approved by the Council on October 10, 2018.

In contrast to hatcheries and fish screens, lands are not affected by "age" in the same way structural assets may be. However, it remains critical that land management activities continue to maintain conditions at or above baseline. Mitigation lands, necessary structures (buildings, barns, outbuildings, etc.), and field equipment must be maintained and protected in order for sponsors to provide quality habitat for fish and wildlife to meet mitigation obligations.

As part of the Program's asset plans, Bonneville conducts remote sensing and on-site inspections to provide comprehensive and regular reporting on the condition of the lands and other critical assets (structures and equipment) as part of their agency-wide Asset Management Key Strategic Initiative. That initiative guided development of strategic asset management plans (SAMPs) for fish and wildlife lands, hatcheries, and fish screens. These Bonneville SAMPs recognize and complement the Council's Asset Management Strategic Plan, though the land assets have never been incorporated into the collaborative and coordinated process as was done

[8]The Asset Management Strategic Plan was developed in the following 4 phases for the Program's past investments (Phase 1: Asset Inventory; Phase 2: Condition Assessment; Phase 3: Prioritization and Phase 4: Strategic Planning).

for the Program's hatcheries and screens[9]. The elements of the lands SAMPs and the associated critical assets need to be prioritized to maintain lands' projects and adequately fund annual and recurring needs to align with mitigation requirements and conservation needs to ensure the longevity and integrity of the Program's past investments.

Lands purchased using Bonneville funding are considered investments and long-term assets of the Program and should be formally incorporated into the annual process established by the Asset Management Strategic Plan utilizing the inventory and assessments conducted by Bonneville's SAMPs. There is a need to have reliable support for critical non-recurring maintenance needs for land assets as has been prioritized for the Program's hatcheries and fish screens using FY 2022 and 2023 Reserve Distribution Clause funds, respectively.

As with the approach and process used for Program hatcheries and screens, the Program's lands need to be folded into this process. The Council recommends that Bonneville formalize and include lands, and their supporting facilities and field equipment, within the Asset Management Strategic Plan for non-recurring maintenance needs and adequate annual preventative maintenance support for Program investments. Doing so will ensure that the integrity of the Program's past investments is maintained and that investments are able to continue to deliver their intended benefit to fish and wildlife over time.

Recommendations: Incorporate Bonneville-acquired lands into the Council's and Bonneville's asset plan as is occurring for hatcheries and screens. Bonneville should use the assessments of the SAMPS to develop a prioritized list of non-recurring maintenance needs and include into the annual process guided by the project sponsors and Asset Management Subcommittee[10].

## 2. Environmental stressors – invasive species, wildfire risk, and climate

The Columbia River Basin continues to experience physical and biological stressors that influence the health of the aquatic and terrestrial environment. This is exemplified in lands projects because of their direct interaction with invasive species, wildfire risk, and changes in climate. These stressors were also highlighted in the programmatic comments as part of the ISRP report.

Climate impacts are an overarching theme that is associated with many cascading impacts across the landscape, including on protected lands. Changes in climate include drier and hotter summer conditions and warmer and wetter winter conditions. These conditions can exacerbate

[9] At the time of the Council's approval of the Asset Management Strategic Plan the expectations were that the Budget Oversight Group (BOG) process would be the primary tool to be used to address non-recurring needs associated with the wildlife lands (e.g., natural events, emergencies and miscellaneous needs). The BOG process is no longer functioning and the replacement process, Project Change Coordination Forum (PCCF), has not yet demonstrated the ability to address within-year adjustments in a transparent and adequate manner. In addition, the BOG and PCCF processes only have the ability to address within-year budget adjustments.

[10] Represented by Council member Ed Schriever and Jason Sweet (Executive Manager, Fish and Wildlife Division, Bonneville).

drought conditions and lead to more intense flooding events, both of which can directly impact fish and wildlife populations.

Warmer and drier conditions also increase the risk of catastrophic wildfires, which are becoming more normative across the Columbia Basin. Wildfire can strike anywhere, anytime, and can be extremely destructive, not only by burning valuable environmental resources, but also by the methods used to fight the fire and the impact on existing infrastructure such as roads and fences. Several projects indicated they are working on post wildfire mitigation – controlling weeds, addressing the impacts of wildfires on progress improving and enhancing lands, post fire seeding, repairing roads and fences, and shifting management focus to recently burned area at the expense of other project land management actions. Following wildfire, non-native annual grasses often invade the recently burned areas, changing plant community structure and function.

Project staff are working on vegetation management, including forest management, native plant establishment, and controlling invasives on the lands under this review. Invasive plants take advantage of disrupted conditions to proliferate and invade habitat. Invasive species management is a consistent ecological challenge identified across projects in this review. Concerns include expansion and spread of invasive annual grasses, and interactions among invasive species, altered fire regimes, and changes in climate.

Recommendations: Bonneville should encourage project sponsors to frame management objectives around ecological resilience, strategic containment of invasives, protection of high-quality habitats, and reduction of wildfire risk in Land Management Plans and annual budgets. Management plans should include the identification of wildfire protection resources, preparedness, and plans for post-fire mitigation, including replanting native plants and addressing invasive weeds. Disturbances can sometimes create opportunities for improving land and infrastructure to be more resilient in the future and should be considered following disturbance events. Climate impact considerations should be considered in land management plans.

## 3. Program Performance

### A. Tracking Program performance

Lands projects may span decades or be relatively new additions to the Program. Some relate to settlement agreements for fish or wildlife, and some acquire or protect lands for other purposes. These lands have been tracked and records kept in a variety of ways over the last few decades. Over time, this has led to discrepancies in the information assembled on each parcel of land (e.g., acreage, mitigation attributed to particular dam(s), location, ownership, etc.) when comparing information from various reporting sources (e.g., the Council, Bonneville's realty department, Wildlife Advisory Committee, Regional HEP team, CBFish and other older Bonneville reports, and information provided by sponsors over multiple project review cycles).

These discrepancies hinder our ability to accurately characterize the status of mitigation associated with lands, particularly where there are established ledgers of losses and habitat gains. As the region moves closer to completing wildlife mitigation associated with construction and inundation losses and following the Council's encouragement to settle remaining operational losses, there is an increasing need to document this accomplishment with an accurate database of protected lands.

In this review, project sponsors reviewed parcel-level data and provided corrections for the Council's records. In the majority of cases, the Council's records are updated with those records from the project sponsors and Bonneville. In a few cases, there are some lingering questions about individual parcels- usually related to changing project numbers over time or changing acreage as portions of parcels are acquired or traded. These questions can be addressed with project sponsors on a case-by-case basis, as needed. There are also some discrepancies between Council records and Bonneville records. These are typically small discrepancies and may relate to the historical methodology used to determine the acreage of parcels (e.g., on-the -ground surveys, county assessor records, or Geographic Information Systems).

Recommendations: The Council commits to improving the ability to track protection efforts under the Program. This includes documenting source information, good record keeping, and coordinating with and confirming parcel information (e.g., land management plan status, number acres protected, etc.) with Bonneville and project sponsors. As part of this process, the Council will develop a relational database with all lands information in it, coordinate with Bonneville and project sponsors to keep this database up to date and meet regularly with Bonneville to address any remaining inconsistencies.

**B. Land Management Plans**

Land management plans (LMPs) serve as guides for the management of BPA funded fee title acquisitions and some easements to ensure compliance with mitigation agreements and any conservation easements granted over a property. Bonneville usually requires land management plans for real property interest secured with ratepayer funds but will acknowledge exceptions on a case-by-case basis. Where Bonneville funds an easement only, the terms of the easement may be sufficient, and additional plans may not be needed. LMPs should include wildlife, fish, plants, or habitats of interest, known cultural resources, reserved rights and allowable actions, and any restrictions and describe how the sponsor will manage for those elements. LMPs also guide monitoring for mitigation and compliance within the agreed-upon terms for the property. Over time, the plans should be updated to reflect current conditions and adjustments to management actions. Many sponsors indicated that their land management plans are in draft form or need updating or that they have an update planned for future years. The ISRP stated that development of clear expectations regarding management plans and mechanisms to incorporate changes through time would be beneficial. They also suggest that LMPs should be living documents to ensure the integrity of these mitigation lands is maintained and reflected in annual reporting.

It is important to recognize that Bonneville's 2024 Hatchery and Lands Strategic Asset Management Plan (SAMP) is working to improve sponsor compliance for submitting new and updated land management plans and developing a system to measure the status of the program and progress relative to mitigation obligations.

Recommendations: As part of the 2026 Program's goals and objectives (e.g., objectives W3, W4, and E6), and tracking Program Performance, Bonneville should identify the status (i.e., draft, in revision, acknowledged) of land management plans (see also Policy issue 3a), develop clearer expectations regarding the frequency of management plan revisions, procedures for transitioning draft plans to finalized status, and encourage sponsors to incorporate adaptive management findings into revised plans and implementation actions. Bonneville should also encourage project sponsors to more clearly align Statements of Work with land management plan objectives.

### C. SMART objectives and Adaptive Management

During the last wildlife lands review in 2017 (which most of the projects under review here were a part of), the Council recommended, based on the ISRP review, developing quantifiable objectives for most projects. Many sponsors in this review indicated that quantifiable objectives had been established either prior to or after the last review. Several projects reported that quantifiable objectives will be included in their next iteration of Land Management Plans. Other projects reported that they were making progress in developing quantitative objectives and addressing past Council recommendations but due to budget constraints, the process was on hold for now.

In this check-in review, the ISRP noted the need for clearer, more quantitative and operationally explicit objectives across all lands. Strengthening objectives will help clarify and prioritize actions being implemented, the ecological responses expected, and how progress is evaluated. Their comments parallel programmatic comments made in the 2017 Wildlife Project Review that emphasized the importance of time-specific, quantifiable objectives as foundational elements of adaptive management and that projects continue to vary wildly in their use of adaptive management frameworks and therefore their ability to evaluate restoration actions. In the current review, the ISRP recognizes additional challenges given budget constraints and altered landscapes and recognizes that many lands projects historically emphasized acquisition as mitigation for construction and inundation of the federal dams, or for habitat unit accounting rather than explicit ecological performance monitoring. This resulted in many projects containing implementation and management objectives, but not necessarily measurable objectives tied to timelines, thresholds, or adaptive management decision pathways.

Recommendations: Bonneville should encourage strengthening the linkage of SMART (specific, measurable, achievable, relevant, timebound) objectives to land management to prioritize actions for the ecological protection and restoration of these mitigation lands. All project sponsors should consider and incorporate the ISRP's guidance on developing SMART objectives and include them in their land management plans and/or their statements of work (ISRP's Lands review report; Online Appendix 1).

### D. Workshops and technical information exchanges

The ISRP emphasized that collaborative workshops and technical exchanges among project sponsors, the ISRP, Bonneville, Council staff, and regional technical experts could accelerate development of adaptive management approaches and lead to sharing successful management strategies and implementation, monitoring tools, and analytical approaches. This peer-to-peer learning and informational exchange could improve consistency, technical capacity, and long-term effectiveness of lands projects.

While workshops and technical exchanges could provide many benefits to the Program's implementation and coordination efforts, it is also important to consider the time, effort, and cost of coordinating such workshops and the interest and participation from project sponsors. In some cases, a project review process itself can deliver similar benefits.

Recommendation: The Council will continue to consider opportunities for workshops and technical information exchanges, whether occurring directly through a project review process or separate from that process.

# PART 3: Summary of Project Recommendations

Part 3 of this document contains the Council's recommendations for the projects themselves. The following spreadsheet (Table 1) lists the projects reviewed during the Lands review and provides the Council's recommendations for each project addressed in this review, including any conditions, comments or guidance associated with the recommendation. Following is a brief overview of the ISRP's UCUT review and guidance.

## 1. Project #2008-007-00, *Upper Columbia United Tribes (UCUT) Monitoring and Evaluation (M&E) Program*

This was the one project that warranted standard ISRP review due to the purpose and emphasis of this project. The project provides monitoring and evaluation of restoration activities and results on mitigation lands for the five UCUT member tribes. Each project uses its budget allocation, usually 5%, for implementation and compliance monitoring activities to fund this project. Monitoring data is used to compare the condition of managed lands to reference sites that represent a desired future condition for the following lands projects:

Project #1992-061-02, *Albeni Falls Wildlife Mitigation-Kalispel Tribe*

Project #1992-061-05, *Albeni Falls Wildlife Mitigation-Kootenai Tribe*

Project #1992-061-06, *Albeni Falls Wildlife Mitigation-Coeur D'Alene Tribe*

Project #1992-048-00, *Hellsgate Big Game Winter Range (Colville Confederated Tribes)*

Project #1998-003-00, *Wildlife Mitigation/Operations and Maintenance (O&M) for Spokane Tribe Land Acquisitions*

The ISRP has reviewed this project several times. Most recently was a 2018 follow-up review to the 2017 Wildlife Category Review that included a final ISRP recommendation of "meets scientific review criteria (qualified)". The ISRP noted in the current review that they have adequately followed through on their plans to address issues described in the 2018 follow-up review and the project "meets scientific review criteria". The ISRP noted the many strengths of the Upper Columbia United Tribes Monitoring and Evaluation Program (UWMEP) and offered some suggestions to improve the program further. These include more interpretation of broad scale patterns, assessing statistical power, expanding analysis to inform interpretation of data, disaggregating the data at reference sites, revisiting reference sites, developing time histories at mitigation sites, and archiving eDNA samples. Overall, the ISRP found the UWMEP approach to be an excellent and scientifically sound framework for monitoring wildlife lands projects.

## 2. ISRP Programmatic Comments

The ISRP provided programmatic comments based on identified themes seen across the projects in this review. These are touched upon in Part 2 above and listed below. We recommend all project sponsors and relevant Bonneville staff read the full report.

a. The need for quantitative objectives
b. Monitoring, evaluation, and adaptive management
c. Emerging opportunities for regional monitoring and shared technical infrastructure
d. Invasive species, wildfire risk, and climate resilience
e. Consistency in reporting and updates of land management plans
f. Workshops and collaborative technical exchanges

## 3. ISRP Project Specific Guidance

The targeted list of questions sent to sponsors to initiate this review asked if they had any questions for the ISRP or were interested in ISRP guidance on specific aspects of their project. Twelve projects responded to the request for additional guidance. See the ISRP's report for details regarding the specific guidance for each of the twelve projects. While not all projects reviewed requested ISRP guidance on specific aspects of their projects, this suite of projects share similar goals and objectives. The Council intends the ISRP's input to benefit and strengthen all projects reviewed into the future and recommends project sponsors read the project specific guidance in addition to the rest of the ISRP's report.

**Table 1a. Fish and Wildlife Program Lands Review project list (29 projects)**

| Project Number | Proponent Orgs | Project Title | Project Focus – wildlife or fish lands | Expense Budget - 5-yr. Average (2022-2026) | Council Recommendation |
|---|---|---|---|---|---|
| 1990-092-00 | CTUIR | Wanaket Wildlife Area | Wildlife Lands | $417,941 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 1991-061-00 | WDFW | Swanson Lake Wildlife Mitigation | Wildlife Lands | $373,720 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 1992-048-00 | CTCR | Hellsgate Big Game Winter Range | Wildlife Lands | $2,398,480 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 1992-061-02 | KT | Albeni Falls Wildlife Mitigation-Kalispel Tribe | Wildlife Lands | $1,133,704 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |

| Project Number | Proponent Orgs | Project Title | Project Focus – wildlife or fish lands | Expense Budget - 5-yr. Average (2022-2026) | Council Recommendation |
|---|---|---|---|---|---|
| 1992-061-03 | IDFG | Albeni Falls Wildlife Mitigation-Idaho Department of Fish and Game (IDFG) | Wildlife Lands | $1,807,368 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 1992-061-05 | KTOI | Albeni Falls Wildlife Mitigation-Kootenai Tribe | Wildlife Lands | $426,819 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 1992-061-06 | CDAT | Albeni Falls Wildlife Mitigation-Coeur D'Alene Tribe | Wildlife Lands | $833,356 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 1994-044-00 | WDFW | Sagebrush Flat Wildlife Mitigation | Wildlife Lands | $493,226 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 1995-057-02 | SBT | Shoshone-Bannock Wildlife Mitigation Projects | Wildlife Lands | $524,435 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management |

| Project Number | Proponent Orgs | Project Title | Project Focus – wildlife or fish lands | Expense Budget - 5-yr. Average (2022-2026) | Council Recommendation |
|---|---|---|---|---|---|
| | | | | | plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 1995-057-03 | SPT | Southern Idaho Wildlife Mitigation--Shoshone-Paiute Tribes | Wildlife Lands | $297,992 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 1995-060-01 | CTUIR | IsqÃºulktpe Watershed Project | Wildlife Lands | $283,435 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 1996-080-00 | NPT | Northeast Oregon Wildlife Project | Wildlife Lands | $483,093 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 1996-094-01 | WDFW | Scotch Creek Wildlife Mitigation | Wildlife Lands | $508,232 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 1998-003-00 | STOI | Wildlife Mitigation/Operations and | Wildlife Lands | $567,483 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. |

| Project Number | Proponent Orgs | Project Title | Project Focus – wildlife or fish lands | Expense Budget - 5-yr. Average (2022-2026) | Council Recommendation |
|---|---|---|---|---|---|
| | | Maintenance (O&M) for Spokane Tribe Land Acquisitions | | | Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 1998-022-00 | CTWSRO | Pine Creek Conservation Area | Wildlife Lands | $536,827 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 2000-015-00 | CTWSRO | Upper John Day Conservation Lands Program | Fish Lands | $896,915 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 2000-026-00 | CTUIR | Tat'win Wildlife Area Operations | Wildlife Lands | $501,452 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 2002-003-00 | CSKT | Secure and Restore Fish and Wildlife Habitat in Montana | Fish Lands | $112,045 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |

| Project Number | Proponent Orgs | Project Title | Project Focus – wildlife or fish lands | Expense Budget - 5-yr. Average (2022-2026) | Council Recommendation |
|---|---|---|---|---|---|
| 2002-014-00 | WDFW | Sunnyside Wildlife Mitigation | Wildlife Lands | $261,324 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 2003-012-00 | WDFW | Shillapoo Wildlife Mitigation | Wildlife Lands | $454,442 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 2006-003-00 | WDFW | Desert Wildlife Mitigation | Wildlife Lands | $161,745 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 2006-004-00 | WDFW | Wenas Wildlife Mitigation | Wildlife Lands | $558,808 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 2006-005-00 | WDFW | Asotin Creek Wildlife Mitigation | Wildlife Lands | $255,613 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management |

| Project Number | Proponent Orgs | Project Title | Project Focus – wildlife or fish lands | Expense Budget - 5-yr. Average (2022-2026) | Council Recommendation |
|---|---|---|---|---|---|
| | | | | | plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 2008-007-00 | UCUT | Upper Columbia United Tribes (UCUT) Monitoring and Evaluation (M&E) Program | Wildlife Lands | $238,480 | Continue implementation - meets scientific review criteria. Please see ISRP project-specific review suggestions. In addition, please see Part 3 and 3.1. |
| 2008-102-00 | CTCR | Upper Columbia Land Operation and Maintenance | Fish Lands | $330,602 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report and project specific guidance. |
| 2008-104-00 | CTCR | Upper Columbia Land & Water Acquisition | Fish Lands | $1,669,428 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Continue to coordinate with project #2002-013-01 (Columbia Basin Water Transactions). Being that this project seems to be currently focused solely on water acquisitions, not all policy issues in Part 2 may be relevant, but please review as they relate to potential future land acquisition. In addition, see ISRP report. |
| 2011-004-00 | ODFW | ODFW Operation & Maintenance (O&M) | Wildlife Lands | $1,987,122 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |
| 2024-004-00 | STOI | Upland Wildlife Habitat Management | Wildlife Lands | $1,650,747 | This project was previously reviewed and recommended by the Council on May 26, 2026. In addition, see ISRP report. |

| Project Number | Proponent Orgs | Project Title | Project Focus – wildlife or fish lands | Expense Budget - 5-yr. Average (2022-2026) | Council Recommendation |
|---|---|---|---|---|---|
| 2026-003-00 | BPT | Burns Paiute Wildlife Areas O&M | Wildlife Lands | $558,809 | Continue implementation and incorporate the Council's review recommendations into future implementation, as appropriate. Please see Part 2, Policy Issues (2 - environmental stressors; 3a – tracking Program performance; 3b - land management plans; and 3c - SMART objectives and adaptive management). In addition, see ISRP report. |

**Table 1b. BPA Support – These 6 projects administratively support (i.e., BPA Support) the Lands category of projects and receive direct funding from Bonneville associated with the Northwest Power Act. These projects are not part of the review. For regional transparency, this informational table outlines how these projects contribute to Fish and Wildlife Program Lands.**

| Project Number | Proponent Orgs | Project Title | Project Focus – wildlife or fish lands | Project Description of Work Implemented |
|---|---|---|---|---|
| 2008-303-00 | CTWSO | Columbia and Willamette Rivers Operations Administration | Wildlife Lands | Provides the necessary support to the Confederated Tribes of Warm Springs to coordinate with and participate in the Willamette Wildlife Mitigation Program (WWMP). |
| 2008-800-00 | MFWP | Montana Resident Fish Habitat Acquisition | Fish Lands | Implements the Montana Fish Accord MOA. |
| 2010-088-00 | OSC | Upper and Lower Lemhi Acquisition/Easements | Fish Lands | Closed as of Sept 2025. Assists in acquiring interests in land and water in the Lemhi Watershed. In conjunction with OSC's Lemhi River Restoration Project, 2010-072-00 |
| 2011-003-00 | ODFW | Willamette Wildlife Fund | Wildlife Lands | Provides the funding necessary for ODFW to implement the Willamette Wildlife MOA |
| 2013-002-00 | BPA | Land Acquisition Monitoring | Fish Lands | This project funds the annual monitoring work completed by BPA's GIS staff for baseline surveys for lands secured through the Program. On the Transmission side of BPA. |
| 2018-001-00 | BPA | BPA Pre-Acquisition | Fish Lands | This project funds the BPA realty group to do the pre-acquisition activities needed to acquire an acquisition such as title review, site visits, etc. On the Transmission side of BPA. |