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March 1, 2007

MEMORANDUM

TO: Fish and Wildlife Committee

FROM: Patty O'Toole, Program Implementation Manager

SUBJECT: Report on PISCES wildlife operation and maintenance comments

The Council invited review and comment on the PISCES wildlife operation and maintenance summary table concerning project costs for the wildlife portion of the Council's Fish and Wildlife Program over the last month.

The comment period closed on February 23rd and what follows is a brief summary of comments the Council received.

In the Council's project-funding recommendations to Bonneville for Fiscal Years 2007-2009 (adopted in November 2006), the Council agreed to undertake a review of the operation and maintenance activities and costs in the program. The Council decided to focus initially on the operation and maintenance activities and costs related to lands acquired for wildlife mitigation.

As part of this review, Bonneville staff prepared a summary of wildlife project budget information, based on data gathered for Bonneville's "PISCES" project and contract management software.

The Council sought comment on the utility of the project budget information in the PISCES database for the comprehensive wildlife land operations and maintenance review.

The Council received thirteen separate comment letters. Seven were from Columbia Basin tribes: Confederated Tribes of the Umatilla Indian Reservation, Burns Paiute Tribe, Kootenai Tribe of Idaho, Colville Tribe, Spokane Tribe, Yakama Indian Nation, and Kalispel Tribe. Three were from state fish and wildlife agencies: Washington Department of Fish and Wildlife, Idaho Department of Fish and Game, Oregon Department of Fish and Wildlife. Comments were also received from the Columbia Basin Fish and Wildlife Authority, Seattle City Light and the Bureau of Reclamation.

There was general support of the Council review of operation and maintenance work in the wildlife mitigation program. However, there was general agreement in the comments that PISCES information in its current state should not be used at this time for the purpose of analyzing actual costs of operation and maintenance activities nor for benchmarking or standardization of those costs. We received comments that PISCES is a valuable contracting tool, but many issues need to be addressed before using outside of that context. Examples of the comments received are:

- The data is not accurate (acreage or work elements not the same as in actual contracts for example). In some cases, significantly inaccurate.
- Commenters disagree with how project expenses were categorized. The method used for the summary table does not reflect actual work or expenses. Managers need to be in agreement on how to categorize work before PISCES data can be used for this purpose.
- PISCES numbers are estimated costs, not actual costs. Actual costs should be used to discuss costs in an operation and maintenance review.
- Commenters disagree with how activities were categorized as enhancement or maintenance (example: controlled burning).
- The method does not incorporate the actual funding level needed to maintain habitat units that have been credited to Bonneville. Some projects are under-funded and unable to perform appropriate operation and maintenance.
- More needs to be known about the condition of land and type of restoration for the exercise can be meaningful.
- Costs will always be different because salaries, indirect costs and work specifications (example: fence building specifications) are different for different entities.
- The phase of project (start up costs different than costs for well established projects) influences costs and is not captured within PISCES.
- A metric to quantify or quality the value of project land should be developed. This would help assess the biological benefit of the project.
- The Council should support the analysis of overall funding levels and mechanisms including consideration of long term trust funds and other incentives for efficiency.
- With additional work, PISCES could be more useful to provide better accounting of specific O&M tasks.
- PISCES information could be useful as long as it used in a general way to analyze O&M costs, but it is not useful if it is not used out of context.