



**IDAHO DEPARTMENT OF FISH AND GAME**

600 South Walnut/P.O. Box 25  
Boise, Idaho 83707

C.L. "Butch" Otter / Governor  
Cal Groen / Director

Patty O'Toole  
Program Implementation Manager  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue  
Suite 1100  
Portland, OR 97204

February 15, 2007

Dear Patty,

We have reviewed the summary of project costs for wildlife and considered the utility of PISCES in terms of land operations and maintenance review, standardizing costs for similar activities, and how it might be improved for future use.

After review of the tables we received, we note a discrepancy of 1255 acres in the Acreage Managed Under the Project column for 1995-057-00 - Southern Idaho Wildlife Mitigation – IDFG. Also, in the Albeni Falls Acreage Managed Under the Project column for 1992-061-00 we had a 2006 end of year total of 2739 acres. We did not review or proof the figures on the FY06 wildlife project costs table as it is problematic whether or not we could attempt to verify these figures while meeting the caveats or details described in the footnotes.

In answer to the questions posed by the Council, we believe that PISCES is inadequate in terms of being able to provide a comprehensive review of wildlife land operations and maintenance, or measure cost effectiveness or standardize costs for similar activities in the program. In our estimation, PISCES does not provide the detail or use the data necessary to do these activities or assist the IEAB with its task. While PISCES does provide a way to track implementation of contracts in a general sense, we feel it does not have the capacity to reflect the real differences the many contracts and managers must factor in as they implement BPA wildlife O&M across the Columbia Basin.

Specifically:

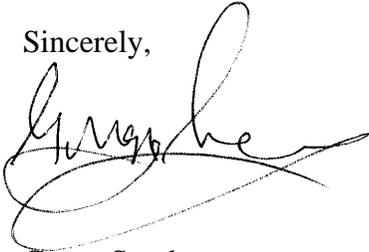
- PISCES cannot differentiate between such things as vegetative and population monitoring.
- PISCES cannot differentiate the differences between such things as fence types being used on different projects, which would result in different costs. In one case, it may be necessary to use a 2 strand smooth wire electric fence to keep cattle out of a riparian area while another project may require 4-strand barbed wire or a jack fence.

- PISCES is primarily divided by work elements in a contract. We feel these categories do not reflect the differences between actual activities done on the ground. And not everything fits into the categories currently found in PISCES, so there will be differences in how the same activity is actually categorized and entered into PISCES.
- PISCES reflects primarily contract estimates and “spending authority”. It does not incorporate actual costs, which are sent to BPA by each contractor. Therefore, it is not based on costs but only estimates.
- PISCES is not reflective of markets or different conditions on the ground. A contract for building 3 miles of 3-strand barbed wire fence in central Oregon will likely be very different than a contract for building 3 miles of 3-strand barbed wire fence in northern Idaho based both on market and ground conditions.

In terms of improving PISCES, it would seem to be a good project tracking device and a way that BPA can connect with all its many contractors in a consistent manner. However, it is not an accounting tool and we don't believe it can be “improved” to do such a thing. We do suggest that it might be used in place of annual reports or further enhanced so that it could do so. This might reduce overall costs and administration of contracts and reflect more timely updates and reporting.

We appreciate your request for our input and hope our comments are of some value. We look forward to working together on these questions.

Sincerely,



Gregg Servheen  
Wildlife Program Coordinator

cc: W. Bill Booth  
Dorie Welch  
Lee Watts  
Joann Hunt  
CBFWA Wildlife Committee