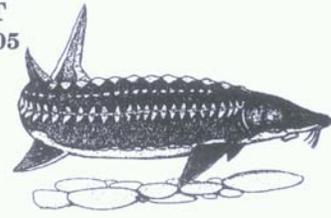




KOOTENAI TRIBE OF IDAHO

FISH AND WILDLIFE DEPARTMENT
P.O. Box 1269 Bonners Ferry, Idaho 83805
(208) 267-3620 Fax No. (208) 267-1131



February 23, 2007

Dear Patty O'Toole,

I'm writing in response to the NWPCC invitation to review and comment on the "Wildlife Summary" concerning project costs for the wildlife portion of the Council's Fish and Wildlife Program.

Several questions were posed on the NWPCC website, and I'd like to address as many as possible to assist the NWPCC and IEAB in the FY07-09 Wildlife Review:

1) NWPCC is seeking comment on the utility of the project budget information in the PISCES database for the comprehensive wildlife land operations and maintenance review.

- Pisces examples provided for review were inconsistent with "O&M definitions" and had incorrect calculations associated with them. Before Pisces information can be used, calculations, figures and acreages must be reviewed by F&W managers (e.g., 211 acres of Kootenai Tribal mitigation lands were divided by select project costs which equaled \$877/ac, where planning and coordination, percentages of Non-O&M costs per Work Element, and research, monitoring and evaluation costs were interpreted as "O&M" costs).
- The utility of Pisces is dependent on if it can be compartmentalized into meaningful implementation categories (P&D, C&I, O&M, RM&E), appropriate breakout of cost per "Work Element" category, percent per implementation category, and other relevant measures (i.e., habitat types, geography, etc.) rather than a one-size-fits-all approach.
- Additional consideration must be made to O&M, where it is a variable cost issue tied to regional areas, acreages, new Vs old projects, and landform differences, and cannot be explained or benchmarked very easily.

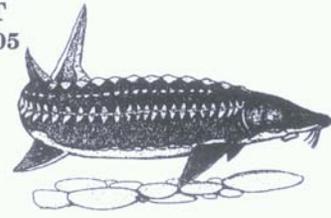
2) NWPCC is asking whether the PISCES data will be useful in helping the Council fulfill its obligation to determine if the projects are using cost-effective means to meet project and program objectives, and if there are ways to standardize operations and maintenance costs for similar activities, even if the characteristics of land parcels are also different.

- Pisces may be utilized as a cost-effective and standardization methodology if NWPCC, IEAB and F&W managers can agree on appropriate compartmentalization of meaningful implementation categories (P&D, C&I, O&M, RM&E), understanding of variable costs (i.e., "Work Element" categories, implementation categories like % of O&M per Work Element), and related measures (i.e., habitat types, geography, etc.) rather than a one-size-fits-all approach.



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3) NWPPC welcomes assistance in determining what data and methods of analysis would be most helpful in making these judgments about wildlife land operation and maintenance costs and whether the PISCES data can play this role.

- Work with F&W managers to better understand proper benchmarking and possible “Range of Costs”.
 - Must find suitable comparisons for this work
 - Other programs may be under funded in comparison based upon funding sources or mandates
 - Range of costs is better than a ceiling approach, where a ceiling approach encourages lower \$ sponsors to increase requests and penalizes those with special needs/conditions

4) NWPPC is interested in any recommendations you may have about how the PISCES data might be improved in the future.

- Need to describe and define O&M in terms that can fit projects within the Program
 - Planning and Design (P&D), Construction and Implementation (C&I), Research, Monitoring and Evaluation (RM&E) are not part of O&M costs.
 - May need to be compartmentalized into meaningful categories with funding ranges rather than a one-size-fits-all approach or budget cap/ceiling
 - Habitat type, geography, location, land form type
- O&M should not be perceived as a “bow wave” problem - part of a maturing program, O&M will necessarily become the majority of expenditures.
- O&M includes both on-the-ground actions and administrative support.
- O&M is not a 1:1 linear expression of current costs/acre
 - O&M cost/acre will decrease over time and with increases in acreage.
 - Start up or base costs are higher per acre due to scope or size (i.e., Kootenai Tribal mitigation lands).
 - O&M costs vary due to location, habitat type, geography, acreage, new Vs old projects, and other related factors.

Thank you for this opportunity to review and comment on the Wildlife O&M Review.

Sincerely,

/s/ Scott Soultz

Scott Soultz,

Wildlife Biologist / Wildlife Dept. Manager