



Confederated Tribes and Bands  
of the Yakama Nation

Established by the  
Treaty of June 9, 1855

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**Patty O'Toole**  
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February 20, 2007

Dear Ms. O'Toole,

Thank you for the opportunity to comment on the Council's review of the operation and maintenance portion of the Wildlife Program. I feel that this review is long overdue and I am happy to see that it is finally receiving attention. The long-term success of the Council's Fish and Wildlife Program is dependent on the ability to implement all of the measures, not just the Wildlife O&M, in an efficient and cost-effective manner. My hope is that enough effort will be expended in this endeavor to facilitate the development of long-term agreements for the operation and maintenance of the lands being protected and restored as mitigation for the construction impacts due to the development of the Federal Hydropower System on the Columbia River. It is impossible to adequately manage these lands in the long-term when the funds needed for management are subject to review every three years.

I understand that the Council has asked its Independent Economic Advisory Board to assist in this review. In light of this, I would like to add some comments to help direct their efforts.

Use of PISCES data: The use of PISCES information should be done very cautiously. PISCES is a very recent addition to the contract management of these projects. Because of the diverse assemblage of activities carried out in the Council's Fish and Wildlife Program, it has been difficult to adapt the PISCES system to adequately address all of the types of activities being undertaken. The nature of long-term O&M is one of the areas that we have struggled with in terms of adequately implementing PISCES. PISCES works best when applied to projects with specific, known and measurable activities. For example, a project installing a specific amount of fence on a specific property can be identified well using the PISCES system. Long-term wildlife management, however, involves activities that are less able to be specifically predicted. Wildlife area management often is driven in a reactionary way. In other words, management responds to conditions that can not always be predicted. A large amount of wildlife area management involves controlling weed infestations, trespass issues, garbage dumping, road maintenance and fence repair. PISCES would have the managers predict the amount and location of the need for these activities for the coming year or years. This is possible only in a general manner. Long-term O&M is most effectively managed by addressing the average amount of these activities needed on an annual basis. A manager can predict the average amount of fence repair or replacement that will be needed annually, but not the specific locations.

Budgeting wildlife area management is best conducted with line item budgets. Land management works best when a crew of biologists and technicians are hired and remain on the project for many years. The "salaries and wages" budget line is the most important item in a management budget. The personnel on the project will be implementing various activities that differ from year to year. One year may emphasize fence repair, another



may require Russian olive removal activities. Management works best when a manager has a stable enough budget to hire personnel for long-term employment. PISCES budgets do not reflect the variable nature of management very well.

Because managers emphasize line item budgets, it has been difficult for them to adapt to breaking out expenses in the PISCES system. PISCES budget categorization has always been used to estimate the costs of the various work elements. At best they are gross estimations. At worst they are guesses, based on little or no thought. Much caution should be used when consulting these estimates in relation to actual costs per work element.

Variable nature of Operation & Maintenance activities: Proper budgeting for long-term O&M includes the planning for activities that occur infrequently. Examples of infrequent activities are repair work related to floods or other catastrophic events, road gravel replacement, water control replacement, trash removal, etc. To fund an infrequent activity, managers on a fixed budget must either reduce the attention paid to annual activities during the year of the infrequent activity, or save up funds for multiple years in anticipation of the infrequent need. Budget flexibility, again, is of paramount importance when addressing these needs.

Cost of O&M during the life of a property: The O&M needed for the first few years of a property is usually more intensive than that needed after a few years. This is due to initial requirements such as weed control, fence repair or installation, trash removal, etc. As the weeds are controlled and native functions are restored, the annual O&M needed to maintain these functions is lessened. Depending on the nature of the project, however, the lessened effort required to maintain the functions may be offset by the cost of infrequent items such as those listed referred to above.

Other influences: Many factors enter in to the determination of the appropriate O&M needed for a project. These include the amount of property perimeter, the adjacent land use, proximity to cities or agricultural activity, etc. I have visited most of the Council's wildlife mitigation projects. Though there are general similarities between them, each project has its own set of unique circumstances that influence the O&M requirements. These unique circumstances can not easily be dealt with in a standardized method.

In light of the observations provided above, I would like to offer a few recommendations to consider when conducting an analysis of the O&M needs of the various wildlife projects.

Long-term stability: One of the most important components of successfully running an operations and maintenance program is funding stability. Budgets often need to be planned years in advance to make sure that the infrequent items can be accomplished. The ability to attract and maintain high quality personnel is also related to budget stability. Having the budget up for approval every three years does not constitute budget stability. The Council, BPA and the managers need to enter into long-term agreements to meet the funding requirements of the wildlife areas.

Budget flexibility: Long-term agreements are usually designed to allow for budget flexibility. This is important to ensure that the infrequent activities are covered and to allow managers to adapt to changing needs and priorities. PISCES-style contracts generally do not allow the flexibility needed to operate long-term



projects in this manner. Long-term, flexible budgets also promote cost-effectiveness. When a manager is provided with a budget that must be adhered to for a number of years, that manager will be looking for ways to make those funds go the farthest.

Use of PISCES information: The use of PISCES information in a cost-effective analysis should be done very cautiously. As stated above, it has been very difficult to apply PISCES to operation and maintenance projects. Most wildlife areas have completed management plans, with goals, objectives and the means of measuring the progress toward them. The appropriate questions to ask in a cost effectiveness analysis pertain to the amount of funds for personnel, equipment, fuel, repairs, etc that are needed to accomplish the annual goals.

On-site analyses: The Yakama Nation manages a wetlands and riparian restoration project encompassing over 21,000 acres of floodplain lands in an intensively agricultural landscape. The properties within this project range in size from a few hundred acres to several thousand acres. Each property is quite different than the next. Though general goals can be made for the whole project, individual goals must be set for each property. The operation and maintenance needs for each property reflects this diversity. Each property requires different levels of attention. If this is true on just one project, the diversity reflected within all of the projects throughout the Columbia Basin must be much greater. A cookbook analysis will not be able to adequately measure the cost-effectiveness of these divergent projects.

In light of this, I would strongly recommend that time be taken to visit the projects. On-site analysis is the most important tool an analyst can have in this situation. There are no shortcuts in a process such as this.

**Acres information provided in the Draft FY06 Wildlife Project Costs Table:** BPA and the Yakama Nation have just completed an update on the acreage and HEP information for the Wetlands and Riparian Restoration Project. To date 21,000 acres have been protected, are undergoing restoration and management. The average annual cost for the operation and maintenance of this project is \$750,000.

Thank you for your assistance in this important review of the wildlife projects. I am happy to be of further assistance and look forward to working with the Council, BPA, and the other managers in assuring that the wildlife projects are funded at an appropriate, cost-effective level long into the future.

Sincerely,

Tracy Hames  
Waterfowl Biologist  
Yakama Nation Wildlife Resource Management