### An Evaluation of the Decision Making Processes of the Central Arizona Project Fund Transfer Program

A Report to the U. S. Fish and Wildlife Service

By the

Wildlife Management Institute

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#### **EXECUTIVE SUMMARY**

The Wildlife Management Institute (WMI) was asked to perform a 1-year evaluation of the decision making processes of the Central Arizona Project (CAP) Fund Transfer Program in achieving its goal of assisting in the recovery of native fishes of the Gila River basin and disadvantaging non-native fishes in the basin. This work was deemed essential to determine if the program direction or methods of implementation need adjustment.

WMI was asked to review the original objectives of the program as stated in the 1994 and 2001 consultations, pursuant to section 7 of the Endangered Species Act and subsequent actions of the CAP Fund Transfer Program to determine if progress is being made in achieving those goals.

WMI was charged with performing 3 basic tasks:

- Review relevant portions of the 1994 and 2001 biological opinions and subsequent actions of the CAP Fund Transfer Program, contracts let, and other completed and ongoing project activities associated with the program.
- 2. Critically evaluate the decision-making processes and the assumptions used by the CAP Fund Transfer Program to achieve its goals and formulate recommendations for improvement.
- 3. Prepare a draft Final Performance Report for the Service that incorporates all analyses, conclusions, specific recommendations, and other materials derived from completion of Tasks 1 and 2, and make a presentation to a joint meeting of the CAP Fund Transfer Program Policy and Technical Teams to discuss the results and recommendations.

WMI conducted the review by evaluating project and background documents, interviewing current and past committee members and analyzing contracts let.

The CAP Fund Transfer Program provided project funds from 1997-2005, except no funds were provided in 1998. Over the funding period, 127 projects totaling \$4,945,045 were approved. WMI found the number of projects approved by the CAP Fund Transfer Program was stable since 1997 and averaged 18 projects per year from 1997-2004 (excluding 1988). Annual approved funding levels varied significantly due to actions on deleted projects and delays associated with pending projects. To define the general types of projects completed under the CAP Fund Transfer Program, WMI aggregated approved contracts into 1 of 7 project types. Greater than 40% of funds spent under the CAP Fund Transfer Program were on projects proposing to affect non-native control/removal.

Since 1997, 33% of projects funded through CAP Fund Transfer Program were considered completed. A higher than expected percentage of projects was classified as deleted or pending.

WMI found projects classified as completed or ongoing within the CAP Fund Transfer Program reflected an equal distribution of funding between Reasonable and Prudent Alternative (RPA)/Conservation Measure 3 and RPA/Conservation Measure 4.

WMI documented 46% of funds were expended for intermediate or low recovery plan priority projects. Several interpretations to explain this low percentage are offered. CAP Fund Transfer Program funding was generally spread evenly among each of the 4 jeopardy species.

WMI found both the CAP Fund Transfer Program "Long-term Direction, Project Allocation Guidance, and Rationale" (Guidance Document) and "Central Arizona Project Fund Transfer Program Strategic Plan 2003-2008" (Strategic Plan) had limited usefulness in encouraging rigorous project review, establishing priorities, and ensuring that funded projects address high priority tasks in the recovery plans. WMI found relationships were unclear among the recovery plans, Guidance Document, and Strategic Plan.

WMI recommends the percentage of funding dedicated to highest priority recovery plan actions increase, and that a rationale and justification be provided when funds are dedicated to recovery plan tasks of lower priority.

WMI recommends the current Guidance Document and Strategic Plan be replaced with a viable Strategic Plan that clearly states the long-term vision, mission, and goals of the program. Accompanying that long-term view should be a set of objectives designed to guide actions that advance toward Strategic Plan priorities within a 5-year period.

WMI provides numerous administrative function recommendations to improve accountability of the CAP Fund Transfer Program.

WMI recommends the Policy and Technical Committees evaluate, scope, and hold a multi-agency public process on potential planning and project implementation at the scale of sub-basins or watersheds and make additional efforts to incorporate CAP Fund Transfer Program actions into a larger, comprehensive, regional native fish recovery effort. WMI encourages use of program funds to leverage other funding in these endeavors.

In total, WMI's recommendations outline a program environment in which individual and committee roles and responsibilities are clearly defined; decision-making is formalized, disciplined, and strategic; and program accomplishments are quantifiable and defendable. WMI recommends that strict adherence to such a work environment will minimize the acrimony that characterized the program's past and increase the likelihood of recovery of native fishes in the Gila River basin.

#### INTRODUCTION

In September 2004, the Wildlife Management Institute (WMI) entered into an agreement with the U.S. Fish and Wildlife Service (FWS) to perform a 1-year evaluation of the decision making processes of the Central Arizona Project (CAP) Fund Transfer Program in achieving its goal of assisting in the recovery of native fishes of the Gila River basin and disadvantaging non-native fishes in the basin.

The CAP was completed in 1993 to provide a long term, non-groundwater, water source for municipal, industrial, and agricultural users in Arizona. The water provided through the CAP Aqueduct system represents Arizona's allocation of the flow of the Colorado River. The water is taken from the Colorado River at Lake Havasu and is conveyed across the state in a series of large open aqueducts. The CAP Fund Transfer Program partially mitigates impacts of the CAP on threatened and endangered native fishes of the Gila River basin.

A 1994 FWS biological opinion found that the CAP would allow non-native fishes and other aquatic organisms to move from the lower Colorado River to the Gila River basin, and that spread and establishment of these non-native species would jeopardize the continued existence of 4 native fish species listed under the Endangered Species Act (ESA) as threatened or endangered (hereafter jeopardy species): spikedace (*Meda fulgida*), loach minnow (*Tiaroga cobitis*), Gila topminnow (*Poeciliopsis occidentalis occidentalis*), and razorback sucker (*Xyrauchen texanus*). Reasonable and prudent alternatives (RPAs) in the 1994 biological opinion directed the U.S. Bureau of Reclamation (BR) to transfer funds for 25 years to the FWS for 1) conservation actions (recovery and protection) for the spikedace, loach minnow, Gila topminnow, razorback sucker, or other Gila River basin listed or candidate fish species; and 2) research on, and control of, non-native aquatic species. Under the biological opinion, FWS committed to report annually on how fund expenditures "contribute to the removal of jeopardy from the proposed delivery of CAP water in the Gila River basin."

When consultation on CAP water delivery in the Gila River basin was reinitiated in 2001 pursuant to court order, fund transfers for the 2 purposes established in 1994 were incorporated into the proposed action as conservation measures. These conservation measures reiterated the need for and purposes of the fund transfers. The stated goal of funding conservation actions (recovery and protection) for listed and candidate fish species in the 2001 biological opinion was "to achieve enhanced status for these species through recovery to compensate for threats from the CAP that cannot feasibly be removed or prevented." This was to be accomplished by "implementing, as much as possible, existing and future recovery plans for those fishes." The stated goal of funding non-native aquatic species research and control efforts was "to directly control threats from CAP introduced or mediated nonnatives as well as to achieve enhanced status for Gila basin listed species through recovery to compensate for threats from the CAP that cannot feasibly be removed or prevented." Funding was to be used "to help alleviate existing nonnative aquatic species threats in the Gila River basin, to remove nonnatives that may surmount fish barriers constructed by Reclamation, and to remove or control any nonnative species that may enter the basin via the CAP or other avenues."

Under the 2001 biological opinion, BR transfers \$500,000 to the FWS each year for a total of 25 years to implement the 2 purposes of the CAP Fund Transfer Program. The 25-year figure was based on the 1991 recovery plans for spikedace and loach minnow. Half that amount was identified for native fish recovery actions, and half for non-native aquatic biota control actions. Expenditure of these funds was jointly agreed upon by BR and FWS in consultation with the Arizona (AZGFD) and New Mexico (NMDGF) Departments of Game and Fish. The FWS submits an annual report to BR detailing the expenditure of the funds and how they contributed to recovery of fishes in the Gila River basin.

From WMI's review of CAP documents, the funding transferred by BR to FWS under the 1994 biological opinion originally was not intended to establish a stand-alone program.

Each federal agency involved already was implementing actions to help recover the jeopardy species using their own base funding. The Fund Transfer Program monies were intended to support existing efforts, or to accelerate and expand existing efforts by implementing additional actions on the ground. The funds for recovery and protection (RPA 3) were to be used to implement the existing approved or draft recovery plans for the jeopardy species, using the priorities set forth in those plans. The primary criterion for expenditures from this fund was described as whether the action helped remove the threat of jeopardy from the CAP to the 4 jeopardy species. The concept was to remove other, non-CAP threats from the 4 species to improve their status so that unalleviated threats from the CAP would not have as strong an impact. The funds for non-native management (RPA 4) were intended to be used for emergency management actions against non-native fish to protect the jeopardy species. This fund was considered necessary because it was recognized that physical and chemical barriers were not 100% effective.

Recovery tasks and priorities were established in final or draft recovery plans for each of the 4 jeopardy species. Recovery plans for spikedace and loach minnow were approved in 1991 and were not modified subsequently (FWS 1991a, FWS 1991b). The recovery plan for the razorback sucker was approved in 1998 and recovery goals added in 2002 (FWS 1998a, FWS 2002). The most recent plan for the Gila topminnow available to WMI for this review was a draft dated December 1998 (FWS 1998b). Collectively, these documents provide direction to the CAP Fund Transfer Program and serve as the anchor points for the WMI review of this program.

In 2003, based on the recovery plans for the 4 jeopardy fish species, the CAP Fund Transfer Program produced a document titled "Long-term Direction, Project Allocation Guidance, and Rationale" (Guidance Document) "to define the long-term goals, breadth, priorities, and processes of the 25-year CAP Fund Transfer Program." The overall program goals set forth in the Guidance Document were described as those established by the biological opinions: "(1) achieve enhanced status for listed or candidate Gila River

basin fish species by implementing existing and future recovery plans for those fishes; and (2) alleviate existing non-native aquatic species threats in the Gila River basin, remove non-natives that may surmount fish barriers constructed by Reclamation, and remove or control any non-native species that may enter the basin via the CAP or other avenues." According to the Guidance Document, "In order to accomplish these goals, conservation of all native fishes is important." The Guidance Document established broad program priorities and funding criteria. Identified as highest priority projects were those that were necessary to 1) prevent extinction and stabilize populations in the wild, and 2) replicate rare populations in the wild. Sub-priorities were established for each of these priorities and additional priority considerations were provided to guide project funding. The Guidance Document also set forth the process by which projects were selected for funding.

Beginning in 2003 and at approximately 5-year intervals thereafter, the Guidance Document called for the preparation of a sub-document that provides for shorter-term direction to the program through establishment, review, and modification of strategic goals and priorities. In response, a document titled "Central Arizona Project Fund Transfer Program Strategic Plan 2003-2008" (Strategic Plan) was produced. The Strategic Plan restated broad CAP Fund Transfer Program goals and identified the strategies and objectives that were expected to be accomplished by the program during the next 5 years. According to the document, the plan also "documents objectives that have been implemented since initiation of the Program in 1997" and sought "to identify major sub-goals and provide a basis for a step-wise approach toward achieving the main goal."

#### **OBJECTIVES OF REVIEW**

The charge to WMI was to review the original objectives of the program as stated in the 1994 and 2001 consultations, pursuant to Section 7 of the ESA and subsequent actions of the Fund Transfer Program to determine if progress is being made in achieving those goals. To accomplish this purpose, WMI was asked to complete 3 tasks:

- 1. Review relevant portions of the 1994 and 2001 biological opinions, subsequent actions of the CAP Fund Transfer Program, contracts let, and other completed and ongoing project activities associated with the program.
- Critically evaluate the decision-making processes and the assumptions used by the CAP Fund Transfer Program to achieve its goals and formulate recommendations for improvement.
- 3. Prepare a draft Final Performance Report for the Service that incorporates all analyses, conclusions, specific recommendations, and other materials derived from completion of Tasks 1 and 2, and make a presentation to a joint meeting of the CAP Fund Transfer Program Policy and Technical Teams to discuss the results and recommendations.

### **ACKNOWLEDGEMENTS**

WMI acknowledges all current and past members of the Policy and Technical Committees and agency staff that participated in this review. Paul Barrett served as the primary contact and coordinator for this project.

### **REVIEW METHODS**

#### **ASSUMPTIONS**

WMI recognized the following assumptions pertaining to the structure and function of the CAP Fund Transfer Program:

- 1. Jeopardy species recovery plans formed a sound basis for identification of priority conservation actions to be conducted under the CAP Fund Transfer Program.
- 2. The priority of actions taken by the CAP Fund Transfer Program was determined by the priority established for tasks identified in the jeopardy species recovery plans.
- 3. The CAP Fund Transfer Program planning documents guided identification and selection of projects and these documents reflected the priorities established in the jeopardy species recovery plans.
- 4. The roles and responsibilities of the Technical and Policy Committees were structured to provide adequate and unbiased input of expertise into the development, review, selection, administration, and oversight of projects and funding.
- The CAP Fund Transfer Program was a single program with the mission of advancing recovery of jeopardy species operating within the larger scope of funding and actions taken by federal and state entities intended to advance recovery.

WMI findings on the above-mentioned assumptions are included within the Findings Section. WMI did not evaluate the assumptions of the 1994 or 2001 Biological Opinion nor of any jeopardy species recovery plans.

#### **DOCUMENT REVIEW**

Beginning in August 2004, WMI requested background documents pertinent to the CAP Fund Transfer Program. The requested documents included the 1994 and 2001 biological opinions, status and funding for each CAP Fund Transfer Program project, contracts let

for each completed and ongoing project, Strategic Plan, Guidance Document, 1998 razorback sucker recovery plan, minutes of CAP Fund Transfer Program Policy and Technical Committee meetings, pertinent correspondence, and CAP Fund Transfer Program progress reports. These materials were provided to WMI over the next 8 months. Upon review, WMI requested either missing or additional documents as necessary. Recovery plans for spikedace, loach minnow, and Gila topminnow were obtained from the FWS website (http://ecos.fws.gov/ecos/).

#### PROJECT CHARACTERIZATION

Using the relevant recovery plan or plans and the project descriptions in Appendix 1 of "Progress Report 7, Implementation of Conservation of Native Fishes and Management Against Nonnative Aquatic Species Funds" (hereafter Progress Report 7) and other documents provided to WMI, each individual CAP Fund Transfer Program project was assigned 1) a recovery plan task and priority for each of the 4 jeopardy species addressed by the project, if any, 2) a Strategic Plan goal and objective, and 3) a Guidance Document priority, sub-priority, and appropriate additional priorities. In those instances in which recovery plan tasks and priorities were provided for a project in Progress Report 7, that information was used. Except as noted below, where the information was not available in Progress Report 7, WMI assigned each project a recovery plan task and priority from the applicable recovery plan to the extent appropriate after review of the project description and recovery plan. If a project addressed a jeopardy species but not a priority task identified in the recovery plan for that species, it was identified for the species in question as a project that "applies to jeopardy species but not a recovery priority." Projects that did not address any of the 4 jeopardy species or addressed them only very generally were not assigned recovery plan tasks or priorities and were labeled as either "administration" (e.g., FWS coordination) or "other species" (e.g., pupfish and chubs).

The progress reports and other project documents did not indicate which elements of the Strategic Plan and Guidance Document were satisfied by a project. Consequently, 2 members of the WMI review team working independently assigned each CAP Fund

Transfer Program project (except 9 projects classified by WMI as "administration") a Strategic Plan goal and objective and a Guidance Document priority, sub-priority, and from 0 to 3 additional priorities. When completed, the 2 review team members compared project Strategic Plan and Guidance Document assignments and when different, referred to pertinent information to come to agreement on the most appropriate classifications.

In addition to use of individual Strategic Plan goals in our analysis, we categorized these goals by the Strategic Plan's 3 recovery needs and by classifications we established. We created these classifications by recording key words in each Strategic Plan goal and then using these key words to group substantively similar goals. We found 7 groupings logically captured all of the subjects addressed by the goals.

Some assumptions were made in interpretation of the Guidance Document. The Guidance Document stated that additional priority should be given to funding projects that "1) benefit the four species identified in the 1994 biological opinion; 2) benefit multiple species, including listed, candidate, and state-listed species; 3) provide immediate on-the-ground benefit; and/or 4) address other activities pertaining to research or management." The Guidance Document did not provide any further information on how to interpret whether a project satisfies 1 or more of these additional priority funding criteria. We interpreted the first criterion to mean a project should benefit all 4 jeopardy species (spikedace, loach minnow, Gila topminnow, and razorback sucker). We interpreted the second criterion to mean benefits from a project that addresses more than 1 of the 17 native fish species in the Gila River basin identified in Progress Report 7 as eligible to receive CAP Fund Transfer Program funding. An "on-the-ground benefit" was interpreted to mean a benefit from a project that carries out an activity involving surveying/handling of live fish or construction of tangible structures, or a project that is an essential precursor to such activities. We determined the final criterion did not provide useful information beyond that provided by the other criteria and, therefore, it was not used in our analysis.

For each project, the task number, fiscal year of initiation, title, status, and funding was recorded based on information in Appendix 1 of Progress Report 7. Status of projects in the progress report was identified as completed, ongoing, pending, or deleted. Based on interviews of CAP Fund Transfer Program staff members, we understood completed projects were ones for which final project products were approved by FWS and BR. WMI understood ongoing projects were those for which a contract had been let or funds obligated. Pending projects were those approved by the Policy Committee, but for which no contract had been let or obligation of funds had taken place. Projects identified as deleted were understood to be either pending or ongoing projects that had been terminated. In our efforts to record project status, we found 1 project (3-63) listed in Appendix 1 of Progress Report 7 and earlier progress reports as both a completed project and a pending project. For the purposes of our analyses, this project was considered to be completed. Similarly, WMI found 1 project (3-59) listed in the progress reports as both an ongoing project and a pending project. It was considered as an ongoing project in our analyses.

To evaluate project funding in relation to each of the 4 jeopardy species, WMI assumed the project funding amount provided in Progress Report 7 was apportioned equally among each of the species addressed by the project. We allocated funding for our analysis accordingly.

#### PERSONAL INTERVIEWS

WMI interviewed 7 of the 8 current members of the Technical and Policy Committees in Phoenix during May 4-6, 2005. In addition, the Policy and Technical Committees were each interviewed as a group. The only Committee member not available was Technical Committee member David Propst, NMDGF. A standard set of questions was asked of each person interviewed and interviews lasted approximately 2 hours (Appendix 1). Individual notes were taken by each review team member and later discussed and summarized for completeness. In addition, WMI met on the first day with Rob Clarkson

at the BR office for a more general introduction to the CAP and to the CAP Fund Transfer Program.

#### PHONE INTERVIEWS

Based on input from current Technical and Policy Committee members, WMI determined it would be desirable to interview previous members of these Committees. WMI conducted the remaining interviews via conference telephone calls among the interviewee and the 3 WMI review team members. Seven phone interviews of previous committee members and 1 interview of David Propst were conducted from May 25 to June 14. WMI believes all but 2 previous members of the committees were interviewed.

For previous Technical and Policy Committee members, 2 sets of standard questions were asked of each interviewee based on whether the committee member had been involved in the development or review of the Strategic Plan and/or Guidance Document (Appendix 2). Interviewees who were not involved in the development or review of these documents were asked fewer questions because questions relating to those subjects were deleted. Each phone interview lasted approximately 1 hour. Once again, each review team member recorded individual notes and shared a summary of each interview with the other 2 review team members.

#### **DATA ANALYSES**

The information described above was used to characterize projects. Data were incorporated into standard Excel spreadsheets for use in developing a series of summary analyses. In the following discussions WMI offers a snapshot retrospective analysis of the first 9 years of the Program.

#### **ANALYSIS**

#### PROJECT ACCOMPLISHMENTS

The CAP Fund Transfer Program provided project funds from 1997-2005, except no funds were provided in 1998. Over the funding period, 127 projects totaling \$4,945,045 were approved (Table 1).

#### **TYPES OF PROJECTS**

To define the general types of projects completed under the CAP Fund Transfer Program, the review team aggregated approved contracts into 1 of 7 project types:

- 1. Artificial Propagation
- 2. Ecology, Status and Distribution
- 3. Land and Water Protection
- 4. Native Replication/Repatriation
- 5. Non-native Control/Removal
- 6. Program Effectiveness
- 7. Coordination

Of funds spent under the CAP Fund Transfer Program, 41% was on projects proposing to affect Non-native Control/Removal (Table 2). Funds committed to Native Replication/Repatriation, Program Effectiveness and Coordination were a minor funding commitment with <6% of funds going to each these project types (Table 2).

Table 1: Projects approved and funding within the CAP Fund Transfer Program for the years 1997, 1999-2005. Cell entries are for all project status categories combined.

Status	1997	1998	1999	2000	2001	2002	2003	2004	2005	Total
Number of Projects	24	0	19	15	8	20	13	20	8	127
Funding	\$892,673	\$0	\$632,709	\$623,744	\$578,136	\$709,202	\$522,255	\$461,697	\$524,629	\$4,945,045

Table 2: The percentage of CAP Fund Transfer Program funding devoted to a classification of project types for the years 1997, 1999-2005. Cell entries are the percentage of funds dedicated for all project status categories combined.

Status	1997	1999	2000	2001	2002	2003	2004	2005	Total
Artificial Propagation	1%	22%	12%	22%	38%	15%	19%	42%	20%
Coordination	11%	6%	6%	3%	12%	2%	0%	0%	6%
Ecology, Status and Distribution	37%	13%	15%	0%	21%	16%	14%	8%	17%
Land and Water Protection	5%	3%	32%	48%	0%	0%	0%	0%	11%
Native Replication/Repatriation	0%	4%	0%	0%	9%	2%	5%	0%	3%
Non-native Control/Removal	46%	49%	36%	27%	20%	64%	43%	51%	41%
Program Effectiveness	0%	2%	0%	0%	0%	0%	18%	0%	2%
Grand Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

#### CHRONOLOGY OF PROJECT COMPLETION

Since 1997, 33% of projects funded through CAP Fund Transfer Program were considered completed (Table 3). Projects classified as deleted annually captured 30-70% of funding from 1997-2001, but dropped off substantially since 2001 (Table 3). As might be expected, ongoing projects were most numerous in recent years, but 24% of funds committed prior to 2000 were still considered ongoing (Table 3). Pending projects were never a substantial percentage of available funds and were most numerous in recent years. A larger than expected percentage of funds committed prior to 2000 were still considered pending (16%) (Table 3).

# BIOLOGICAL OPINION CONSERVATION MEASURES IN RELATION TO PROJECT FUNDING

Under the 2001 Revised Biological Opinion, recovery of native fish (RPA 3) and control of non-native aquatic biota (RPA 4) became Conservation Measures 3 and 4, and formed the basis for the CAP Fund Transfer Program spending allocation of 50% for each of the tasks.

WMI found projects classified as completed or ongoing within the CAP Fund Transfer Program reflected an equal distribution of funding between RPA/Conservation Measure 3 and RPA/Conservation Measure 4 (Table 4).

Table 3: Project status and year of approval for funding distributed through the CAP Fund Transfer Program. Cell entries are the percentage of funds dedicated within each year.

Status				Ye	ar				Total
	1997	1999	2000	2001	2002	2003	2004	2005	-
Completed	56%	30%	28%	14%	46%	46%	4%	19%	33%
Deleted	30%	44%	55%	70%	0%	14%	0%	5%	28%
Ongoing	4%	20%	14%	16%	47%	21%	72%	76%	31%
Pending	10%	6%	2%	0%	7%	18%	24%	0%	8%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

Table 4: The percentage of CAP Fund Transfer Program funding devoted to Reasonable and Prudent Alternative (RPA)/Conservation Measure 3 and 4 actions for the years 1997, 1999-2005. Cell entries are the percentage of funds dedicated within each year.

Project Status	RPA/Conservation Measure	1997	1999	2000	2001	2002	2003	2004	2005	Total
Completed	(3) Recovery	14%	25%	8%	3%	33%	14%	1%	0%	14%
	(4) Control	44%	4%	20%	11%	13%	32%	3%	19%	20%
Deleted	(3) Recovery	17%	21%	38%	39%	0%	0%	0%	0%	15%
	(4) Control	11%	26%	17%	31%	0%	14%	0%	5%	13%
Ongoing	(3) Recovery	4%	0%	14%	0%	24%	17%	27%	49%	16%
	(4) Control	0%	19%	0%	16%	23%	4%	44%	27%	15%
Pending	(3) Recovery	4%	2%	0%	0%	7%	18%	11%	0%	5%
	(4) Control	6%	3%	2%	0%	0%	0%	13%	0%	3%
Grand Total		100%	100%	100%	100%	100%	100%	100%	100%	100%

# RECOVERY PLAN PRIORITIES IN RELATION TO PROJECT FUNDING

Recovery plans for the 4 jeopardy species assigned a priority to each task identified within the recovery plan. Priorities were ranked from 1-3 in the spikedace, loach minnow, and Gila topminnow recovery plans, and 1-5 in the razorback sucker recovery plan:

- Priority 1 actions in the spikedace and loach minnow recovery plans are
  absolutely essential to prevent extinction of the species in the foreseeable future.
  In the Gila topminnow and razorback sucker recovery plans, priority 1 actions
  must be taken to prevent extinction in the immediate future and prevent
  irreversible declines in the foreseeable future.
- Priority 2 actions for spikedace and loach minnow are necessary to maintain the species current population status. For Gila topminnow and razorback sucker, priority 2 actions must be taken to prevent a significant decline in the number of extant populations and needed habitats of the species and allow recovery to a less endangered status.
- Priority 3 actions include all other actions necessary to provide for full recovery
  of the species (spikedace and loach minnow) or to meet the recovery objectives
  (Gila topminnow and razorback sucker).

Forty-three percent of the funding within the CAP Fund Transfer Program was committed for projects identified as Priority 1 in 1 or more of the jeopardy species recovery plans (Table 5). Priority 2 and 3 projects received 14% and 23%, respectively, of funding (Table 5). Seven percent of funding was for administration (Table 5). Projects that applied to the jeopardy species, but were not recognized as a priority in the recovery plans, received 4% of funding (Table 5). Nine percent of funding was committed to species other than the 4 jeopardy species (Table 5).

Table 5: The percentage of CAP Fund Transfer Program funding devoted to priorities identified in jeopardy species recovery plans and differentiated by project status for the years 1997, 1999-2005.

Recovery Plan Priority					Ye	ar				Total
	Status	1997	1999	2000	2001	2002	2003	2004	2005	
1 (Absolutely Essential Actions)	Completed	40%	3%	9%	9%	2%	22%	2%	7%	14%
	Deleted	18%	28%	51%	0%	0%	14%	0%	0%	15%
	Ongoing	4%	20%	0%	8%	20%	4%	18%	21%	11%
	Pending	1%	4%	1%	0%	0%	10%	19%	0%	4%
	Total	63%	54%	61%	17%	23%	50%	39%	28%	43%
2 (Necessary Actions)	Completed	10%	2%	0%	0%	0%	0%	0%	0%	2%
	Deleted	3%	17%	0%	48%	0%	0%	0%	0%	8%
	Ongoing	0%	0%	0%	0%	0%	0%	0%	8%	1%
	Pending	9%	2%	0%	0%	0%	5%	0%	0%	2%
	Total	23%	21%	0%	48%	0%	5%	0%	8%	14%
3 (All Other Actions)	Completed	1%	9%	13%	2%	33%	22%	2%	12%	12%
	Deleted	3%	0%	4%	22%	0%	0%	0%	5%	4%
	Ongoing	0%	0%	0%	8%	5%	1%	11%	29%	6%
	Pending	0%	0%	1%	0%	5%	1%	1%	0%	1%
	Total	3%	9%	18%	32%	43%	24%	14%	46%	23%
Administration	Completed	5%	6%	6%	3%	11%	2%	0%	0%	5%
	Deleted	5%	0%	0%	0%	0%	0%	0%	0%	1%
	Ongoing	0%	0%	0%	0%	1%	0%	17%	0%	2%
	Total	11%	6%	6%	3%	12%	2%	17%	0%	7%
Applies to Jeopardy Sp. But Not Recovery Priority	Completed	0%	9%	1%	0%	0%	0%	0%	0%	1%
	Ongoing	0%	0%	14%	0%	4%	0%	1%	0%	2%
	Pending	0%	0%	0%	0%	2%	2%	0%	0%	0%
	Total	0%	9%	15%	0%	6%	2%	1%	0%	4%

Table 5: Continued.

Recovery Plan Priority					Ye	ar				Total
	Status	1997	1999	2000	2001	2002	2003	2004	2005	
Other Species	Ongoing	0%	0%	0%	0%	17%	16%	25%	17%	8%
	Pending	0%	0%	0%	0%	0%	0%	4%	0%	0%
	Total	0%	0%	0%	0%	17%	16%	29%	17%	9%
Grand Total		100%	100%	100%	100%	100%	100%	100%	100%	100%

CAP Fund Transfer Program funding was generally spread evenly among each of the 4 jeopardy species. Loach minnow and spikedace received the largest proportions of funding (30%, and 25%, respectively), Gila topminnow received slightly less (22%), and razorback sucker received 14% of funding (Table 6).

Adherence to recovery plan priorities differed by species. For Gila topminnow, 93% of funding went to Priority 1 projects (Table 6). For loach minnow and spikedace, a greater proportion of the funding (44-47%) went to Priority 3 projects than to Priority 1 (32%-33%) or Priority 2 (17%-20%) projects (Table 6). Funding for razorback sucker was concentrated in Priority 1 (64%) and Priority 2 (29%) projects (Table 6).

# GUIDANCE DOCUMENT PRIORITIES IN RELATION TO PROJECT FUNDING

The CAP Fund Transfer Program Guidance Document listed 2 priorities:

- 1. Prevent extinction and stabilize populations in the wild
- 2. Replicate rare populations in the wild

Funding was spread evenly between Guidance Document Priority 1 (prevent extinction) and Guidance Document Priority 2 (replicate populations) (48% vs. 45%, respectively, Table 7). Of funds committed to Guidance Document Priority 1, approximately 90% went to the 2 highest jeopardy species recovery plan priorities (Table 7). Four percent of funds under Guidance Document Priority 1 were applied to actions not listed in the recovery plan, but applicable to the jeopardy species (Table 7). Projects benefiting "Other species" captured no funds under Guidance Document Priority 1 (Table 7).

Table 6: The percentage of CAP Fund Transfer Program funding devoted to priorities identified in recovery plans for each of 4 jeopardy species for the years 1997, 1999-2005. Cell entries are the percentage of funds dedicated for all project status categories combined.

Jeopardy Species Recovery Plan Priority	Gila Topminnow	Loach Minnow	Razorback Sucker	Spikedace	Other Species	Administration	Total
1 (Absolutely Essential Actions)	18.5%	9.7%	8.1%	7.0%	0%	0%	43.3%
2 (Necessary Actions)	0.3%	4.8%	3.6%	5.1%	0%	0%	13.8%
3 (All Other Actions)	0%	12.5%	0%	10.3%	0%	0%	22.8%
Administration	0%	0%	0%	0%	0%	7.3%	7.3%
Applies to Jeopardy Sp. But Not Recovery Priority	1.1%	0.9%	1.2%	0.9%	0%	0%	4.1%
Other Species	0%	0%	0%	0%	8.7%	0%	8.7%
Grand Total	19.9%	27.9%	12.9%	23.2%	8.7%	7.3%	100%

Table 7: The percentage of CAP Fund Transfer Program funding devoted to Jeopardy Species Recovery Plan Priorities and differentiated by CAP Fund Transfer Program Guidance Document Priorities for the years 1997, 1999-2005. Cell entries are the percentage of funds dedicated for all project status categories combined.

Jeopardy Species Recovery Plan Priority	Guidance Document Priority  1: Prevent Extinction	Guidance Document Priority 2: Replicate Populations	None	Total
1 (Absolutely Essential Actions)	32%	11%	0%	43%
2 (Necessary Actions)	11%	3%	0%	14%
3 (All Other Actions)	1%	22%	0%	23%
Administration	0%	0%	7%	7%
Applies to Jeopardy Sp. But Not Recovery Priority	4%	0%	0%	4%
Other Species	0%	9%	0%	9%
Grand Total	48%	45%	7%	100%

Within Guidance Document Priority 2, 49% of funds committed were applied to projects recognized as the lowest jeopardy species recovery priority (Table 7). Only 11% of total funds were allocated to the highest jeopardy species recovery plan priority (Table 7). Nine percent of total funds were allocated to projects under Guidance Document Priority 2 that benefit "other species" (Table 7).

Each Guidance Document priority had 4 sub-priorities. Sub-priorities listed under Prevent Extinction (Guidance Document Priority 1) were:

- 1.1 Construct barriers to protect existing populations
- 1.2 Control non-native aquatic species above barriers
- 1.3 Maintain refugia populations
- 1.4 Implement other actions to remove immediate threats and thereby help prevent extinction in the wild.

Sub-priorities under Replicate Rare Populations (Guidance Document Priority 2) were:

- 2.1 Safeguard streams for replication of rare populations
- 2.2 Where necessary, construct barriers and renovate streams
- 2.3 Undertake captive production, including development of propagation techniques
- 2.4 Implement other actions to insure that rare populations are replicated.

From our analysis, the 2 largest funding commitments were to "implement other actions to remove immediate threats and thereby help prevent extinction in the wild" (Guidance Document Sub-priority 1.4, 29%, Table 8) and "undertake captive production, including development of propagation techniques" (Guidance Document Sub-priority 2.3, 19%, Table 8). All Guidance Document sub-priorities received some funding, but 3 sub-priorities received <5% funding while all others received >10% funding (Table 8).

Table 8: The percentage of CAP Fund Transfer Program funding devoted to Jeopardy Species Recovery Plan Priorities and differentiated by CAP Fund Transfer Program Guidance Document Sub-priorities for the years 1997, 1999-2005. Cell entries are the percentage of funds dedicated for all project status categories combined.

Jeopardy Species Recovery Plan Priority	Guidance Document Priority 1: Prevent Extinction Priority 1 Sub-priorities				Guidance Document Priority 2: Replicate Populations Priority 2 Sub-priorities					Total
	1.1	1.2	1.3	1.4	2.1	2.2	2.3	2.4	None	1
1 (Absolutely Essential Actions)	14%	3%	1%	15%	1%	7%	1%	2%	0%	43%
2 (Necessary Actions)	0%	0%	0%	11%	0%	0%	3%	0%	0%	14%
3 (All Other Actions)	0%	1%	0%	0%	1%	7%	11%	2%	0%	23%
Administration	0%	0%	0%	0%	0%	0%	0%	0%	7%	7%
Applies to Jeopardy Sp. But Not Recovery Priority	0%	0%	0%	4%	0%	0%	0%	0%	0%	4%
Other Species	0%	0%	0%	0%	0%	0%	4%	4%	0%	9%
Grand Total	14%	4%	1%	29%	3%	14%	19%	9%	7%	100%

Table 9: Percentage of funding distributed through the CAP Fund Transfer Program achieving additional priority (as defined in the CAP Fund Transfer Program Guidance Document) by benefiting all 4-jeopardy species. Cell entries are the percentage of funds dedicated for all project status categories combined.

Additional Priority	1997	1999	2000	2001	2002	2003	2004	2005	Total
Benefits All-4 Species	41%	34%	29%	17%	5%	55%	8%	41%	29%
Benefits < 4 Species	59%	66%	71%	83%	95%	45%	92%	59%	71%
Grand Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

"Construct barriers to protect existing populations" and "maintain refugia populations" (Sub-priorities 1.1 and 1.3) were the only 2 sub-priorities with 100% of funding dedicated to projects identified as the highest recovery priority (Table 8). All other sub-priorities contained projects identified as Recovery Plan Priority 2 or 3 (Table 8).

In addition to priorities and sub-priorities, the CAP Fund Transfer Program Guidance Document also assigned additional priority to projects that:

- 1. Benefit the "4 jeopardy" species identified in the 1994 biological opinion
- 2. Benefit multiple species, including listed, candidate, and state-listed species
- 3. Provide immediate on-the-ground benefit
- 4. Address other activities pertaining to research or management

The majority of funds committed through the CAP Fund Transfer Program Project have not benefited "all 4 jeopardy species" (Table 9), a result not unexpected given our narrow interpretation of this criterion and the different aquatic systems inhabited by the 4 jeopardy species. Project funding consistently benefited "multiple-species" (Table 10). The "provides immediate, on-the-ground" benefit priority proved to be more difficult to achieve, with 41% of project funding not providing "on-the-ground" benefit (Table 11).

To assess the aggregate achievement of CAP Fund Transfer Program Guidance Document additional priorities, a cumulative score was calculated by coding projects with a 1 if they benefited all 4 species, benefited multiple species, and provided on the ground benefits. A project qualified in each of the 3 categories obtained an aggregate score of 3, the highest possible score. Sixty-eight percent of project funding was dedicated to projects scoring a 2 or 3 on the aggregate priority score (Table 12).

Table 10: Percentage of funding distributed through the CAP Fund Transfer Program achieving additional priority (as defined in the CAP Fund Transfer Program Guidance Document) by benefiting multiple species. Cell entries are the percentage of funds dedicated for all project status categories combined.

Additional Priority	1997	1999	2000	2001	2002	2003	2004	2005	Total
Benefits Multiple Species	95%	75%	91%	99%	60%	99%	99%	100%	89%
Benefits 1 Species	5%	25%	9%	1%	40%	1%	1%	0%	11%
Grand Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

Table 11: Percentage of funding distributed through the CAP Fund Transfer Program achieving additional priority (as defined in the CAP Fund Transfer Program Guidance Document) by providing immediate, on-the-ground benefits. Cell entries are the percentage of funds dedicated for all project status categories combined.

Additional Priority	1997	1999	2000	2001	2002	2003	2004	2005	Total
On-the-Ground Benefit	37%	74%	63%	83%	70%	37%	58%	42%	59%
No On-the-Ground Benefit	63%	26%	37%	17%	30%	63%	42%	58%	41%
Grand Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

Table 12: Percentage of funding distributed through the CAP Fund Transfer Program differentiated by the aggregate score achieved by projects qualifying for additional priority (as defined in the CAP Fund Transfer Program Guidance Document). Projects were coded with a 1 if they benefited all 4 species, benefited multiple species, and provided on the ground benefits. A project qualified in each of the 3 categories obtained an aggregate score of 3, the highest possible score. Cell entries are the percentage of funds dedicated for all project status categories combined.

Sum of Additional Priority Scores	1997	1999	2000	2001	2002	2003	2004	2005	Total
0	11%	15%	13%	3%	12%	2%	17%	0%	9%
1	34%	17%	2%	1%	57%	9%	32%	17%	23%
2	55%	49%	86%	97%	31%	89%	47%	83%	65%
3	0%	19%	0%	0%	0%	0%	3%	0%	3%
Grand Total	100%	100%	100%	100%	100%	100%	100%	100%	100%

Table 13: The percentage of CAP Fund Transfer Program funding devoted to Recovery Needs identified within the CAP Fund Transfer Program Strategic Plan and differentiated by Jeopardy Species Recovery Plan Priorities. Cell entries are the percentage of funds dedicated for all project status categories combined for the years 1997, 1999-2005.

Jeopardy Species	Strategic Plan Recovery Need							
Recovery Plan Priority	1 (Science Foundation)	2 (Prevent Extinction)	3 (Manage to Recovery)	1				
1 (Absolutely Essential Actions)	14%	28%	4%	47%				
2 (Necessary Actions)	5%	9%	0%	15%				
3 (All Other Actions)	9%	16%	0%	25%				
Administration	2%	0%	0%	2%				
Applies to Jeopardy Sp. But Not Recovery Priority	4%	0%	0%	4%				
Other Species	9%	1%	0%	9%				
Grand Total	42%	53%	5%	100%				

# STRATEGIC PLAN GOALS IN RELATION TO PROJECT FUNDING

The CAP Fund Transfer Program Strategic Plan listed 3 Recovery Needs:

- 1. Build the science foundation for recovery efforts
- 2. Prevent extinction of rare populations and species
- 3. Manage toward recovery

The majority of funding within the CAP Fund Transfer Program was committed for projects to address Recovery Need 2 (54%). Projects addressing Recovery Need 1 received 41% of all funding (Table 13). Only 5% of funds were committed towards projects to address Recovery Need 3 (Table 13). Project funding generally declined over time in the "Science Foundation" recovery need and increased in the "Prevent Extinction" recovery need (Figure 1). Within each Strategic Plan Recovery Need, a greater share of total funding was allocated to projects ranked as Jeopardy Species Recovery Plan Priority 1 than to projects ranked as Recovery Plan Priorities 2 and 3 (Table 13).

Within each Strategic Plan Recovery Need, there were a variety of goals identified. Within Recovery Need 1 (Build the Science Foundation), the following goals were identified:

- 1. Identify critical streams and populations in need of protection.
- 2. Document existing and investigate novel methods to control non-native aquatic biota through funding of integrated pest management/control studies, including genetic methods.
- 3. Develop propagation techniques as necessary.

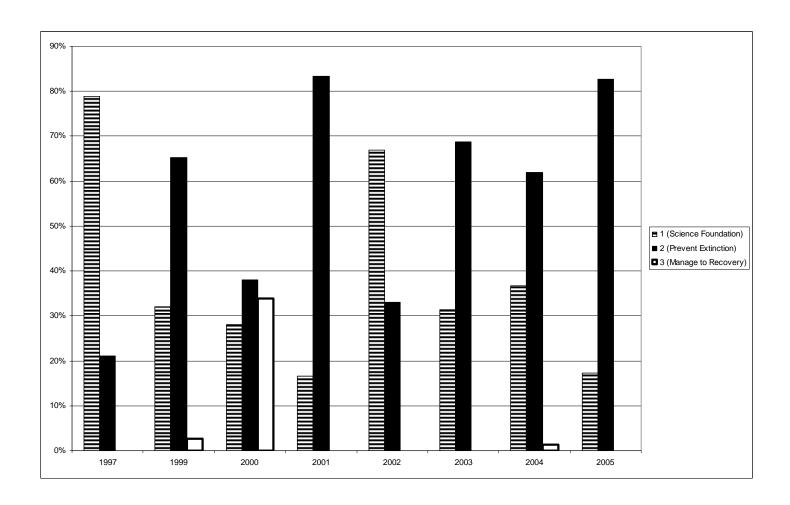


Figure 1: The percentage of CAP Fund Transfer Program funding devoted to Recovery Needs identified within the CAP Fund Transfer Program Strategic Plan from 1997, 1999-2005. Bars represent the percentage of funds dedicated for all status categories combined.

- 4. Assemble and complete information needed to identify larval stages of Gila River basin native fishes.
- 5. Update and assemble existing knowledge of life history needs and ecology of Gila River basin native fishes.
- 6. Determine needs for artificial propagation facilities for Gila River basin native fishes.
- 7. Assemble a database of historic and recent distributions of native fishes of the Gila River basin.
- 8. Survey existing water rights to identify possible protection and acquisition opportunities.
- 9. Survey poorly-studied stream systems to document existing fish communities.
- 10. Determine genetic differentiation among species and stocks as needed.
- 11. Develop and implement a program to obtain management easements for private stock tanks.
- 12. Obtain independent critical review of CAP Fund Transfer Program goals, priorities, and strategies.

The majority of funding of ongoing and completed projects accomplished within Recovery Need 1 (Science Foundation) was focused on Goal 3 (Propagation Techniques), Goal 1 (Identify Populations and Streams), and Goal 2 (Document Control Methods) (Table 14). Two of the 12 goals (Genetic Differentiation, Stock Tank Easements) did not receive funding (Table 14).

Within Recovery Need 2 (Prevent Extinction), the following goals were identified:

- As needed, identify or develop and maintain hatchery/pond stocks of critically endangered populations as insurance against extinction in the wild and to provide sources for population replications.
- 2. If new hatchery facilities are recommended under Recovery Need 1.6, scope, design, and construct a new hatchery facility.

- 3. Scope, design and install low-head fish barriers to prevent upstream movements of non-native biota.
- 4. Acquire adequate supplies of chemicals and associated equipment to conduct surface water renovations.
- 5. Survey stock tanks and other surface waters in drainages identified for native fish protection under Recovery Need 1.1, and remove non-native fishes in advance of renovations.
- 6. Renovate streams and other surface waters identified under Recovery Need 1.1 to remove non-native fishes.
- 7. Replicate rare populations and their associated native fish community into protected streams and other surface waters.
- 8. Acquire critical water rights or easements to protect or enhance key surface waters.
- 9. Acquire habitat and management easements to further protect key surface waters.
- 10. Assess Colorado squawfish and razorback sucker Gila River basin reintroduction successes, failures, and future needs.
- 11. Facilitate the above strategies by ensuring compliance with applicable federal and state laws and regulations, and completion of internal compliance processes.

The majority of funding of ongoing and completed projects accomplished within Recovery Need 2 (Prevent Extinction) was focused on Goal 3 (Fish Barriers) and Goal 4 (Acquire Chemicals) (Table 14). Three of the 11 Goals (Acquire Easements, Assess Reintroduction, Facilitation) did not receive funding (Table 14).

Table 14: The percentage of CAP Fund Transfer Program funding devoted to Goals/Strategies within Recovery Needs identified within the CAP Fund Transfer Program Strategic Plan for the years 1997, 1999-2005. Cell entries are the percentage of funds dedicated for all project status categories combined.

Recovery Need	Goal/Strategy	1997	1999	2000	2001	2002	2003	2004	2005	Total
1 (Science Foundation)	1.1	15%	5%	0%	0%	19%	7%	14%	8%	9%
	1.2	34%	4%	4%	17%	0%	0%	0%	0%	9%
	1.3	0%	10%	8%	0%	37%	15%	16%	10%	11%
	1.4	0%	9%	15%	0%	0%	0%	0%	0%	3%
	1.5	0%	0%	0%	0%	5%	0%	0%	0%	1%
	1.6	0%	0%	0%	0%	6%	0%	0%	0%	1%
	1.7	15%	1%	1%	0%	0%	10%	0%	0%	4%
	1.8	4%	0%	0%	0%	0%	0%	0%	0%	1%
	1.9	9%	0%	0%	0%	0%	0%	0%	0%	2%
	1.1	0%	0%	0%	0%	0%	0%	0%	0%	0%
	1.11	0%	4%	0%	0%	0%	0%	0%	0%	0%
	1.12	0%	0%	0%	0%	0%	0%	17%	0%	2%
	Total	79%	32%	28%	17%	67%	31%	48%	17%	42%
2 (Prevent Extinction)	2.1	1%	15%	5%	1%	1%	1%	3%	0%	3%
	2.2	0%	0%	0%	22%	0%	0%	0%	32%	6%
	2.3	6%	44%	21%	8%	22%	19%	8%	0%	16%
	2.4	1%	4%	9%	0%	0%	45%	0%	41%	11%
	2.5	0%	0%	2%	3%	0%	0%	24%	0%	3%
	2.6	8%	2%	3%	0%	0%	2%	12%	10%	4%
	2.7	4%	0%	0%	0%	10%	2%	5%	0%	3%
	2.8	1%	0%	0%	49%	0%	0%	0%	0%	6%
	2.9	0%	0%	0%	0%	0%	0%	0%	0%	0%
	2.10	0%	0%	0%	0%	0%	0%	0%	0%	0%
	2.11	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Total	21%	65%	38%	83%	33%	69%	51%	83%	53%

Table 14: Continued.

Recovery Need	Goal/Strategy	1997	1999	2000	2001	2002	2003	2004	2005	Total
3 (Manage to Recovery)	3.1	0%	0%	0%	0%	0%	0%	0%	0%	0%
	3.2	0%	0%	0%	0%	0%	0%	0%	0%	0%
	3.3	0%	0%	0%	0%	0%	0%	0%	0%	0%
	3.4	0%	0%	0%	0%	0%	0%	0%	0%	0%
	3.5	0%	0%	34%	0%	0%	0%	0%	0%	4%
	3.6	0%	0%	0%	0%	0%	0%	0%	0%	0%
	3.7	0%	0%	0%	0%	0%	0%	1%	0%	1%
	3.8	0%	0%	0%	0%	0%	0%	0%	0%	0%
	3.9	0%	3%	0%	0%	0%	0%	0%	0%	1%
	3.10	0%	0%	0%	0%	0%	0%	0%	0%	0%
	3.11	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Total	0%	3%	34%	0%	0%	0%	1%	0%	5%
Grand Total		100%	100%	100%	100%	100%	100%	100%	100%	100%

Within Recovery Need 3 (Manage to Recovery), the following goals were identified:

- Initiate acquisition and maintenance of hatchery/pond stocks of Verde
  River spikedace, Eagle Creek spikedace, Eagle Creek loach minnow, a
  San Pedro River drainage population of Gila chub, all major genetic stocks
  of Gila topminnow (including mixed lineage), and other species as
  appropriate.
- 2. Initiate the scope, design, and construction of a dedicated native fish hatchery as needed.
- 3. Complete the scoping, design, and installation of low-head fish barriers on five streams.
- 4. Complete the purchase of antimycin and application equipment in sufficient quantity to allow successful renovations of all approved surface waters.
- 5. Initiate the survey and removal of non-native fishes from stock tanks in drainages approved for renovations under Recovery Need 1.1.
- 6. Initiate renovation of a minimum of five streams or other surface waters to prepare them for repatriations of native fishes.
- 7. Initiate replication of stocks of rare species into 10 streams or other surface waters.
- 8. Initiate acquisition of water rights or easements on three surface waters.
- 9. Initiate acquisition of floodplain easements on two streams.
- 10. Complete a study of the Colorado squawfish/razorback sucker reintroduction program for the Gila River basin, and initiate implementation of recommendations to improve the program's success.
- 11. Complete environmental compliance for all proposed on-the-ground projects. Acquire habitat and management easements to further protect key surface waters.

All of the funding of ongoing and completed projects accomplished within Recovery Need 3 (Manage to Recovery) was associated with Goal 5 (Renovated Drainage Survey and Removal of Non-native), Goal 7 (Stock Replication), and Goal 9 (Floodplain Easements) (Table 14). Eight of the 11 goals did not receive funding (Table 14).

### **FINDINGS**

### PROJECT ACCOMPLISHMENTS

WMI found the number of projects approved by the CAP Fund Transfer Program were stable since 1997 and averaged 18 projects per year from 1997-2004 (excluding 1998). Annual approved funding levels varied significantly due to actions on deleted projects and delays associated with pending projects.

### **TYPES OF PROJECTS**

WMI found little funding emphasis was placed on projects to replicate or repatriate native fishes and to protect lands and waters. Most project funding emphasized control and removal of non-native fish. WMI found these funding allocations did not reflect the breadth of Guidance Document priorities and Strategic Plan goals.

### CHRONOLOGY OF PROJECT COMPLETION

WMI found the percentage of completed projects was a good indication program goals were being efficiently and effectively addressed. WMI additionally found the substantial complexity of recovery actions approved under the program was an adequate defense of the percentage of funds classed as ongoing, even when some projects were >5 years in duration.

WMI found the percentage of deleted projects was higher than expected. The low percentage of deleted projects in recent years was interpreted as an improvement in the processes used to allocate funds to projects acceptable to both the Policy and Technical Committees. We acknowledge the varied reasons for project deletion and applaud the efforts to find funds outside of the CAP Fund Transfer Program to achieve program goals. Those projects for which outside funding was obtained, although they appeared as deleted projects, were nonetheless valuable contributions to program goals.

WMI questions the meaningfulness or defensibility of projects classified as pending for >1-3 years.

## BIOLOGICAL OPINION CONSERVATION MEASURES IN RELATION TO PROJECT FUNDING

WMI found the CAP Fund Transfer Program was correctly achieving parity in funding between Conservation Measures 3 and 4.

## RECOVERY PLAN PRIORITIES IN RELATION TO PROJECT FUNDING

Within the assessment of CAP Fund Transfer Program decision making, the WMI finding that 46% of funds committed to jeopardy species recovery plan priorities was expended for intermediate or low priority projects may be interpreted in several ways.

One interpretation is the approval process was not reflective of jeopardy species recovery plan priorities because the Policy and/or Technical Committees were not supportive of recovery plan priorities or paid little attention to them. If true, 2 of the program assumptions (jeopardy species recovery plans form a sound basis for identification of priority conservation actions to be conducted under the CAP Fund Transfer Program and priority actions identified in jeopardy species recovery plan prioritize actions within the CAP Fund Transfer Program) are found to be invalid.

A second interpretation was the committees were utilizing recovery priorities to guide approval, thereby validating program assumptions, while at the same time utilizing funds opportunistically to achieve lower priority actions when lower priority projects were circumstantially available, affordable, timely, and/or operationally efficient.

A third interpretation was the positive values associated with an accomplishment that was a measurable, demonstrable, and an on-the-ground action trumped other higher priority actions.

WMI did not receive specific data to judge the validity of any single interpretation, although anecdotal data suggest all 3 interpretations may at times be operative. WMI noted, for example, that of the funds committed to projects reflective of recovery plan priorities, 98% of funds dedicated to Gila topminnow and 69% of funds dedicated to razorback sucker were to projects classified by the recovery plan for each species as highest priority. Those percentages were reflective of the influence of recovery plans on CAP Fund Transfer Program funding approvals. On the other hand, nearly 50% of funds approved for spikedace and loach minnow were for projects classified by the respective recovery plan as lowest priority. WMI was not provided justification for the departure from recovery plan priorities for those 2 species.

WMI found each jeopardy species received similar funding levels, a finding that met our interpretation of equal ranking of each of the 4 species under the Guidance Document and Strategic Plan. Operational and environmental differences among the 4 species were a justifiable rationale for the small differences observed in funding levels.

### **GUIDANCE DOCUMENT**

WMI found commendable that the Technical and Policy Committees saw the need for and produced the CAP Fund Transfer Guidance Document. However, we found the structure of the Guidance Document was difficult to comprehend. The various priorities, sub-priorities, and additional priorities were loosely described, and linkages and hierarchy among each was left to imagination. WMI also found the document did a poor job of providing an outside entity reasonable access to the committee's decision-making thought-process. In the process of assigning recovery plan tasks and priorities, Guidance Document priorities, and Strategic Plan goals and objectives to projects, WMI found the current structure of the document made it exceedingly difficult to evaluate program accomplishments for several reasons.

First, the relationship between the recovery plans for the 4 jeopardy species and the priorities in the Guidance Document was not readily apparent. Although the Guidance Document was based on implementation of the recovery plans, there was insufficient information presented

to allow a reader to understand how the priorities in the Guidance Document either reflected or deviated from (based on new information) the priorities in the recovery plans.

Second, the Guidance Document was ill equipped to set even broad long-term priorities because the weights given to catchall priorities (e.g., implement other actions) were equal to those given to other more specific priorities (e.g., construct barriers). We classified 38% of all projects as satisfying these catchall priorities (Table 14).

Third, although the Guidance Document took a long look at priorities and the Strategic Plan a 5-year look at priorities, WMI found the relationship between the Guidance Document and the Strategic Plan was unclear.

Based upon our analysis of contracts let, WMI found Guidance Document influence upon program accomplishments and prioritization was variable.

WMI documented approximately equal funding between the 2 Guidance Document priorities (Prevent Extinction and Replicate Populations). Of the funds approved under Guidance Document Priority 1 (Prevent Extinction), approximately 66% was dedicated to projects classified as highest priority within 1 or more jeopardy species recovery plans.

WMI found Guidance Document Priority 2 (Replicate Populations) included substantial funding for projects that were medium to low recovery plan priority. Only 24% of funds were dedicated to highest priority projects within 1 or more jeopardy species recovery plans. The majority of those funds dedicated to lower priorities were concentrated in Guidance Document Sub-priority 2.2 (Construct Barriers and Renovate Streams) and Sub-priority 2.3 (Undertake Captive Production). Those 2 actions, while contained within 1 or more jeopardy species recovery plans, appear to suggest a predilection on the part of the committees to deviate from other higher priority projects recommended in jeopardy species recovery plans. WMI was not provided justification why the committees favored those actions over other higher recovery plan priority actions but we assume 1 or more of the 3 interpretations offered above were operational.

As noted, WMI acknowledges the difficulty in obtaining high percentages of funding for projects that "benefit all-4 species" because of the different aquatic systems inhabited by the 4 jeopardy species and our narrow interpretation of this criterion. WMI found CAP Fund Transfer Program funding was consistently meeting the priority of benefiting multiple species, a result we applaud. A majority of funds provided "on-the-ground" benefit but we had no data to assess whether the accomplishment was favorable to the general recovery of the jeopardy species. WMI does acknowledge the committees favored "on-the-ground" benefits and were guiding funds towards that goal, which from a planning perspective was commendable. Our arbitrary scoring system documented the committees achieved 2 or more of their additional priorities 68% of the time, another accomplishment that was commendable.

### STRATEGIC PLAN

WMI found commendable that the Technical and Policy Committees saw the need for and produced the CAP Fund Transfer Strategic Plan. However, in the process of assigning recovery plan tasks and priorities, Guidance Document priorities, and Strategic Plan goals and objectives to projects, WMI found the current structure of the document made it exceedingly difficult to evaluate program accomplishments for several reasons.

First, WMI found it difficult to see how the Strategic Plan recovery needs, goals, and objectives flowed from the priorities set in the Guidance Document. Guidance Document priorities and sub-priorities were not reflected in the Strategic Plan which adopted a different set of ranking criteria and nomenclature. It was not apparent, therefore, how a given goal in the Strategic Plan related to a priority or sub-priority in the Guidance Document.

Second, as with the Guidance Document, there was insufficient information presented in the Strategic Plan to allow a reader to understand how the priorities in that document either reflected or deviated from (based on new information) the priorities in the recovery plans. From the perspective of the review team, it appeared as though the recovery plans, Guidance

Document, and Strategic Plan were 3 independent efforts to establish priorities, which were only tangentially related.

Third, results of our interviews indicated most committee members viewed the Strategic Plan as an accounting of completed and ongoing actions and identified future needs rather than a plan to get from 1 point to the next. Our findings with respect to the Guidance Document and Strategic Plan suggest these documents currently had limited usefulness in encouraging rigorous project review, establishing priorities, and ensuring funded projects address high priority tasks in the recovery.

As was true with the Guidance Document, WMI found Strategic Plan influence upon program accomplishments and prioritization was variable.

WMI found 2 of the 3 recovery needs in the Strategic Plan received a disproportionately large share of funding. The recovery need "Manage to Recovery" only received 5% of total funding. The "Science Foundation" recovery need dominated funding in the early years of the program, a trend suggested to WMI as appropriate to gather adequate science structure to understand the needs of and threats to jeopardy species. Projects dedicated to preventing extinction dominated in recent years and presumably represented the fruits of science endeavors. WMI was not provided any explanation why "Manage to Recovery" projects were not undertaken.

WMI found the majority of goals listed in the CAP Fund Transfer Strategic Plan received little to no funding. Of the 34 goals listed, nearly 70% of funding was concentrated in 7 goals. For a document intended to guide funding for a 5-year period, that finding was problematic.

### **ADMINISTRATIVE FUNCTIONS**

WMI was reminded several times "bureaucratic" administrative processes limit program effectiveness. WMI respects this desire and has made its recommendations with intention to avoid adding bureaucratic requirements. However, there is a fine line between administrative efficiency and administrative responsibility.

### **Committee Form and Function**

### **Technical Committee**

The purpose of the Technical Committee was to solicit and develop project proposals, evaluate merits of submitted proposals, and provide recommended projects, technical information, and expertise to the Policy Committee regarding those proposals. By definition, members of the Technical Committee must be technically and professionally competent.

The minutes of an August 21, 2003 meeting indicate the Technical Committee decided to schedule their meetings in 1) June before the Policy Committee meeting to finalize project descriptions or "blurbs" (comprised of background, scope of work/assistance, estimated cost, and period of performance) to be funded the next fiscal year; 2) September to develop blurbs for the following fiscal year; and 3) December to finalize the project list to present to the Policy Committee in January. Due to the paucity of records, WMI was unable to determine the extent to which this schedule was followed.

WMI found a need for a more formal approach to conduct of committee business. WMI did not find any information concerning circulation of agendas prior to Technical Committee meetings. Based on our interviews we understood information concerning project ideas or proposals was solicited and distributed occasionally, but unevenly, via email to Technical Committee members prior to the meetings.

WMI found various formats and levels of formality for meeting minutes. Members of the Technical Committee provided copies of personal or draft minutes of the committee meetings. WMI found only 1 instance of minutes jointly agreed upon and finalized by the participants.

The location of committee meetings appeared to rotate among the member agencies with the host agency taking the lead on logistical needs for each meeting. WMI found this practice, although helpful in sharing workloads, did not lead to standardization of operating practices.

WMI heard about several instances of jurisdictional disputes among Technical Committee member agencies. WMI also became aware of individual personality conflicts that hindered committee progress at times. These problems appeared to be more prevalent during earlier years of the program. WMI believes much of this acrimony resulted first from the complex nature of the topics addressed, but also because there was little formal direction or guidelines describing explicit roles and responsibilities for agencies, committees, or individual committee members.

WMI learned of several approaches used by committee members to seek or receive outside expertise. WMI believes it is important the very best information and ideas be incorporated into project selection and design. WMI found additional opportunities must be created for committee members to seek input from the scientific community.

### **Policy Committee**

The Policy Committee served as an oversight committee to the Technical Committee. The main purpose of the Policy Committee was to approve or amend project lists submitted by the Technical Committee. The Policy Committee approves projects based on Technical Committee recommendations and social, logistical, political, financial, or other considerations.

According to the Guidance Document, "the Technical and Policy committees meet jointly early in the calendar year to discuss and recommend selections of potential projects to be funded in the following fiscal year." Since 2001, this meeting occurred in January, but once as late as March. The Guidance Document also noted there was a Policy Committee meeting in June each year to review proposed projects presented by the Technical Committee. Based on the information provided to us, WMI documented that these meetings occurred during

June for the past 4 years. The Policy Committee approved the final project list by September of each year. It was unclear whether this approval occurred at a meeting or by written or electronic correspondence among the Policy Committee members.

Notice of Policy Committee meetings did not appear to have been provided to the general public. To the extent notice was provided to individuals and organizations other than members of the Technical and Policy Committees, it appeared to be ad hoc and informal.

The WMI review did not reveal any documents or information from interviews concerning governance of the Policy Committee. Available minutes did not make clear whether an individual was assigned the task of chairing a Policy Committee meeting. The location of committee meetings apparently rotated among the member agencies with the host agency taking the lead on logistical needs for each meeting. WMI found this practice, although helpful in sharing workloads, did not lead to standardization of operating practices.

The Guidance Document stated, "A short description of purpose, proposed actions, time frame (duration), and estimated funding amount for each potential project are prepared and sent to the Policy Committee" prior to its meeting with the Technical Committee in June. WMI was not provided with copies of agendas for Policy Committee meetings, but we understood from our interviews that the blurbs and task status tables used in the progress reports formed the basis for the Committee's agenda. WMI found no information on circulation of agendas before meetings.

WMI was provided copies of approved, final minutes of 6 Policy Committee meetings from 2002 through 2004. We found that on occasion approval of these minutes was slow due in part to differences among meeting participants in interpretation of the subjects discussed. WMI found 1 instance in which the approval process for minutes of a joint Technical Committee and Policy Committee took 4 months.

As discussed with the Technical Committee, agency jurisdictional issues also were a problem within the Policy Committee. Again, the absence of a clear role and purpose of the

committee, especially in its relationship to the Technical Committee, was a factor. WMI found discussion and information sharing between the Policy Committee and Technical Committee were limited and mostly constrained to projects. Discussions on other topics of mutual interest and related to overall program operations did not routinely occur.

### **Project Selection Process**

WMI found the project selection process was described generally in the Guidance Document (Figure 2). However, no formal process was found to solicit project ideas consistently. Initially, Technical Committee members worked with the Desert Fishes Recovery Team to identify priorities and projects. Some members of the CAP Fund Transfer Program found this to be an insular process in which word of the program was not getting out to others; others felt frustration at not being able to gain consideration of project ideas. At their meeting on 22 January 2003, the Policy and Technical Committees discussed "the most efficient way to solicit project ideas, ranging from a wide distribution, postings on AFS/DFC websites, Co-op Units, and Universities to stimulate a broad range of input and proposals." This discussion also included 1) greater utilization of private sector resources; 2) distribution of the Guidance Document and Strategic Plan with solicitation letters to provide direction on project ideas that would be considered for funding; and 3) a date by which project ideas would no longer be considered for funding in the following fiscal year.

WMI did not find the ideas discussed at the January 2003 Policy Committee meeting were adopted as standard practice. Two informational meetings about the CAP Fund Transfer Program were conducted during 2003, but these meetings apparently were not intended to solicit proposal ideas. Instead, they were described as efforts "to open up the process to people outside of the [CAP Fund Transfer Program], to clarify how the money was dispersed, to discuss what types of projects would be considered and what types of projects would not be considered, and to solicit additional ideas." A PowerPoint presentation was developed, although it did not appear to have been used subsequent to the 2 meetings in 2003.

### **CAP Project Implementation Process**

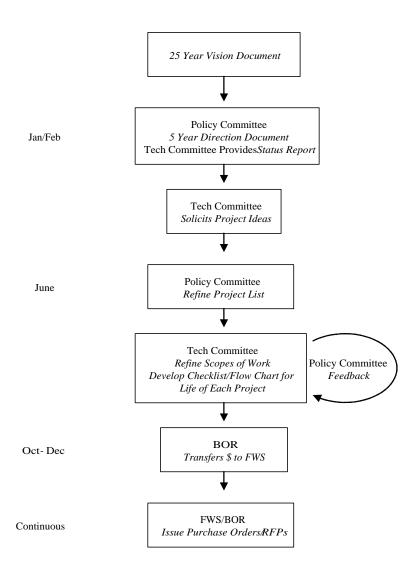


Figure 2. Diagram of CAP annual implementation process

More recently, project ideas generally were developed by Technical Committee members within the CAP Fund Transfer Program. They did not appear to be solicited in any formal or regular manner from the scientific community or from other individuals or organizations. There were occasional requests for project ideas from Technical Committee members to individuals outside the CAP Fund Transfer Program. Outside individuals who were aware of the program may have suggested ideas and made proposals to the Technical Committee. In the early years of the CAP Fund Transfer Program there were some unsolicited proposals. If approved by the Policy Committee, a proposed idea either was undertaken by 1 of the CAP Fund Transfer Program participants or bid out on a competitive basis as a project proposal with a Request for Proposal (RFP), according to the priorities set by federal contracting rules. WMI found there were concerns by outside parties that project ideas developed by them in response to solicitations were undertaken by federal or state agencies or other entities that had preference within federal contracting guidelines.

Lists or descriptions of project ideas for the Technical Committee's consideration generally were distributed electronically in advance of meetings. WMI was provided a copy of 1 electronic message distributed to the Technical Committee for its consideration that listed the projects and associated funding levels proposed for 2004. The timing of this type of distribution and the format, content, and level of detail describing project ideas was reported to be highly variable. Project idea descriptions by CAP Fund Transfer Program agencies reportedly were less detailed and more informal than those from outside parties. Some current and previous Technical Committee representatives voiced concerns that consideration of project ideas took place in separate communications outside of the committee process.

WMI did not find much written documentation concerning Technical Committee consideration of project ideas and development of project lists for Policy Committee review. There did not appear to be a standard format or agreed upon contents required for presentation of project ideas, descriptions, or proposals for consideration within the Technical Committee. Minutes of the 21 August 2003 Technical Committee meeting discussed the review of project ideas to develop project blurbs and completion of a project

list to present to the Policy Committee for review and approval. Apart from development of project blurbs and lists for Policy Committee review, WMI was unable to determine the extent to which the Technical Committee had standardized and formalized its own processes for consideration, development, and approval of project ideas to be developed for the Policy Committee.

The CAP Fund Transfer Program assumed project funding was based on the program's foundational and planning documents: the 2001 biological opinion, recovery plans for the 4 jeopardy species, Guidance Document, and Strategic Plan. WMI found 24% (31) of the project blurbs in the 2005 Progress Report 7 identified at least 1 recovery plan task and associated priority that would be addressed by the project. The remaining 96 project blurbs made no mention of specific recovery plan tasks or priorities. No blurb identified how a project addressed the program priorities and funding criteria established in the Guidance Document. No blurb referenced Strategic Plan recovery needs, goals, or objectives that would be met by a project.

WMI found no mention in the Policy and Technical Committee minutes available of recovery plan tasks and priorities, Guidance Document priorities, or Strategic Plan recovery needs, goals, or objectives in relation to any project. Although WMI found no explicit evidence that the recovery plans, Guidance Document, and Strategic Plan were used in project decisions, past and current Technical Committee members indicated in our interviews they used their knowledge of these documents or professional judgment to evaluate the extent to which project ideas addressed the established priorities. No Policy Committee member indicated he had reviewed project blurbs in relation to project documents.

WMI found no documentation in relation to prioritization of project ideas or proposals by the Technical or Policy Committees. Throughout most of the history of the CAP Fund Transfer Program, Technical Committee members reported there was not a pressing need to prioritize projects for funding.

WMI found little written record of Technical Committee decisions concerning which project ideas had project blurbs developed for Policy Committee review. We also found little documentation of Policy Committee decisions concerning which of the projects on the list presented by the Technical Committee were funded. Concerns also were expressed in our interviews about potential conflicts of interest or the appearance of such conflicts that arose from agency representatives participating in decisions to fund projects to be carried out by their agency.

### **Contracting**

During the review WMI heard numerous concerns about the FWS contracting process. Most contracting for the CAP Fund Transfer Program was through the FWS regional office.

WMI found staff members did not understand the contracting process and believed it was too complex, time consuming, and non-transparent. Committee members admitted little knowledge or understanding of the contracting process and frequently opined how contracting bottlenecks negatively impacted timely and efficient implementation of selected projects. Contracting was believed to impact participation of potential contractors in the program.

### **Document Management**

#### **Primary Program File**

The CAP Fund Transfer Program was the product of 2 federal agencies, the BR and FWS, and, as a result, both agencies share in record keeping for CAP Fund Transfer Program projects. Limited staff in both agencies and absence of a full time administrator specifically assigned to CAP Fund Transfer Program (especially early in the program) resulted in a lack of standard operating procedures and processes for filing project documents.

In some instances during the review WMI received project records from both federal agencies. WMI recognized the complexity of dual agency administration brought on by the need for both agencies to be accountable for funds administered. WMI found both sets of

records were similar but some project status and budget totals differed, making accurate accounting questionable.

WMI did not learn of any procedures in place to address security of program files.

### **Retrieving and Archiving Files**

WMI believes efficient retrieval of project documents is essential. During the review WMI found no central depository for documents, making document retrieval difficult.

Archiving of program documents was essentially non-existent. Reference was made to documents submitted to Arizona State University (Paul Marsh) for archiving. However project staff later learned documents were only being stored in his office and not archived by the University.

Absence of a centralized program file hindered efficient access to program data that could be used for multiple purposes including reporting. Changing personnel involved with the CAP Fund Transfer Program over the years exacerbated this issue.

### **Reporting**

Narrative progress reports summarizing individual projects for each of the 2 major tasks (conservation of native fishes, control of non-native fishes) from 2001 through 2005 were made available to WMI. No reports were obtained for the period from 1997 through 2000. Interim progress reports were requested by the FWS project coordinator from all project principal investigators with variable degree of response.

Project reports were primarily drafted in conjunction with annual committee meetings and prepared at different times each year. Over the years, dates covered by each report varied with some reports covering up to 21 months while others covered 10 months. The project identification process used for reports where projects were numbered and further classified into categories as on-going, deleted, pending, or completed made it difficult to track a

specific project in a progress report if one did not know its current status (i.e., completed, deleted, pending, on-going). Thus, status tables become invaluable parts of the reports.

Information on recovery plans, recovery plan priorities, long range guidance goals, priorities, sub-priorities, and Strategic Plan goals and objectives being addressed by each project was mostly absent in the reports. This information, if provided, would identify purpose and focus of each project and would aid committee members and others in understanding which elements of planning documents were being met.

WMI found format and detail of information presented within the progress reports was improving as more attention was directed to the reporting aspects of the program in recent years.

### PROJECT IMPLEMENTATION

One common concern WMI heard during the review centered on the problem of lengthy delays in finding suitable sites for implementation of CAP Fund Transfer Program projects. A series of hurdles were identified in these delays including political, economic, and environmental. WMI agreed that this problem limited effectiveness of the CAP Fund Transfer Program.

WMI heard the present approach of implementing individual projects resulted in an inefficient application of limited resources. Minimal attention was given to grouping projects into specific definable geographical areas. WMI was told of the benefits of grouping projects into selected geographical areas such as individual watersheds or subbasins, thereby focusing more attention on obtaining the necessary political, economic, and environmental clearances needed for project implementation over a larger area.

From documents and interviews WMI learned the CAP Fund Transfer Program was never intended to be a stand-alone program. WMI concurred the Program would be more effective if it successfully leveraged its funding with other existing agency and non-agency funds.

WMI found little documentation that CAP Fund Transfer Program monies were used to leverage private, state, and other federal funds in support of projects.

### RECOMMENDATIONS

WMI offers the following recommendations in no ranked order of priority.

### PROJECT ACCOMPLISHMENTS

<u>Recommendation 1</u>: WMI recommends the trend of committing 100% of available annual funding continue in future years.

### TYPES OF PROJECTS

<u>Recommendation 2</u>: WMI recommends the categories created by us (or a similar set of descriptors) be utilized in the future to describe the types of projects to give reviewers an easy-to-comprehend matrix of program actions.

### CHRONOLOGY OF PROJECT COMPLETION

<u>Recommendation 3</u>: WMI recommends the Policy and Technical Committees sustain the trend of minimizing deleted projects. When projects are deleted, a clear statement of the reason for deletion should be appended to program summaries.

<u>Recommendation 4</u>: WMI recommends the number of pending projects be reduced and the oldest pending projects be moved to ongoing or deleted. WMI recommends pending projects be <2 years in the classification.

# RECOVERY PLAN PRIORITIES IN RELATION TO PROJECT FUNDING

<u>Recommendation 5</u>: WMI recommends the percentage of funding dedicated to highest priority recovery plan actions increase.

<u>Recommendation 6</u>: WMI recommends when funds are dedicated to medium or low priority recovery plan actions, the rationale and justification for funding projects lower than the highest priority be written and appended to program summaries.

### GUIDANCE DOCUMENT AND STRATEGIC PLAN

<u>Recommendation 7</u>: WMI recommends the Guidance Document be eliminated and replaced with a viable Strategic Plan that includes both a long-term vision and the 5-year objectives for the CAP Fund Transfer Program

Recommendation 8: WMI recommends the CAP Fund Transfer Program Strategic Plan be completely rewritten to clearly state the long term vision, mission and goals of the program. Accompanying that long-term view should be a set of objectives designed to guide actions that advance toward Program priorities within a 5-year period. Program staff should seek help of outside professional planners as the new Strategic Plan is developed. The newly developed Strategic Plan should be updated at least every 5 years or as specifically needed.

<u>Recommendation 9</u>: The revised CAP Fund Transfer Program Strategic Plan should make clear how its priorities reflect or deviate from the priorities established in relevant recovery plans.

<u>Recommendation 10</u>: To be effective, the CAP Fund Transfer Program Strategic Plan must be a living document that clearly provides the framework for all program expenditures in relation to program goals and vision. All actions taken by both committees must be referenced back to Strategic Plan goals and objectives.

### **ADMINISTRATIVE FUNCTIONS**

### **Committee Form and Function**

### **Technical Committee**

<u>Recommendation 11</u>: WMI recommends the Technical Committee take a more formal approach to how it does business. Agendas should be prepared and circulated to committee members at least 2 weeks before each meeting.

<u>Recommendation 12</u>: Formats for agendas and minutes should be standardized and filing protocols for those documents developed. A final agenda should be attached to each set of minutes.

<u>Recommendation 13</u>: All meeting decisions and justifications for those decisions should be clearly identified in the minutes, especially when status of individual projects is changed. To assure minutes are finalized promptly, consideration should be given to limiting them to a recording of topics discussed and actions taken.

<u>Recommendation 14</u>: To standardize committee operations, WMI recommends the FWS representative be made the permanent chair of the Technical Committee. The chair would be responsible for selecting dates and locations of meetings, developing agendas, recording draft minutes and producing final minutes of each meeting.

#### **Policy Committee**

Recommendation 15: WMI recommends the Policy Committee take a more formal approach to how it does business. Agendas should be prepared and circulated to committee members at least 2 weeks before each meeting.

<u>Recommendation 16</u>: Formats for agendas and minutes should be standardized and filing protocols for those documents developed. A final agenda should be attached to each set of minutes.

Recommendation 17: All meeting decisions and justification for those decisions should be clearly identified in the minutes, especially when status of individual projects is changed. To assure minutes are finalized promptly, consideration should be given to limiting them to a recording of topics discussed and actions taken.

<u>Recommendation 18</u>: Time should be set aside during 1of the annual meetings to openly discuss committee operations, functions, and issues of mutual concern with Technical Committee members.

<u>Recommendation 19</u>: Written procedures should be developed by the Policy Committee that clearly define the purpose, function, roles and responsibilities of each committee. Roles of individual committee members, minimal qualifications for committee members and specific guidelines for timing, conduct, and record keeping for committee meetings should be defined. Procedures should also clearly define the roles of each agency.

<u>Recommendation 20</u>: A chair should be designated in advance for each meeting of the Policy Committee. The duties of the chair should be clearly specified in writing.

<u>Recommendation 21</u>: A notice to the public of meeting date, location, and time should be provided for each decision-making meeting of the Policy Committee.

### **Project Selection Process**

<u>Recommendation 22</u>: A formal process should be instituted to solicit project ideas in an efficient manner. Per Technical and Policy Committee discussions, WMI recommends this solicitation process provide direction on project ideas that would be considered for funding based on a CAP Fund Transfer Program Strategic Plan and a date by which project ideas would no longer be considered for funding in the following fiscal year.

<u>Recommendation 23</u>: Particular emphasis needs to be given to increasing discussion with and contribution of ideas by members of the scientific community. The committees should aggressively explore ways outside technical expertise can be accessed. The size of the desert fish scientific community is small and this expertise should be tapped however possible. Scientific expertise in other disciplines should also be considered.

<u>Recommendation 24</u>: Efforts need to be made, through sole source agreements or other mechanisms, to assure those who develop project ideas in response to solicitations by the CAP Fund Transfer Program are not effectively prevented from being selected as a vendor by federal contracting guidelines.

<u>Recommendation 25</u>: The Technical Committee should ensure that all project ideas and lists are described in sufficient detail to allow Committee members to evaluate the merits of these ideas and lists.

<u>Recommendation 26</u>: WMI recommends adoption of a standard format for presentation of the project ideas, descriptions, or proposals that are considered within the Technical Committee.

<u>Recommendation 27</u>: WMI recommends project ideas, descriptions, or proposals be provided to Committee members sufficiently in advance of decisional meetings to allow thorough review and consideration.

<u>Recommendation 28</u>: Technical Committee consideration of project ideas and its decisions with respect to individual projects and development of project lists and descriptions for Policy Committee review and approval should be documented explicitly in formal written minutes of the Technical Committee.

<u>Recommendation 29</u>: Policy Committee decisions concerning funding of the projects on the list presented by the Technical Committee should be explicit and documented in formal written minutes.

<u>Recommendation 30</u>: Each current and past project blurb should identify 1 or more recovery plan tasks that would be addressed by the project and the recovery plan priorities of those tasks.

<u>Recommendation 31</u>: Each project blurb should identify 1 or more program priorities of a CAP Fund Transfer Program Strategic Plan that would be addressed by the project.

<u>Recommendation 32</u>: Technical and Policy Committee members should consider project ideas and review project descriptions explicitly in relation to the tasks and priorities established in recovery plans and strategic plans, and this consideration and review should be documented in formal minutes.

### **Contracting**

<u>Recommendation 33</u>: A regular presentation by the FWS regional contracting officer and/or staff to both committees of the CAP Fund Transfer Program explaining key aspects of the process should be scheduled. Key aspects of this discussion should center on how the process can be more transparent, timely, and available to a wider audience of potential vendors.

<u>Recommendation 34:</u> Committee members should develop timelines for project review and selection that would accommodate time requirements needed for contracting and increase availability and interest of potential contractors.

### **Document Management**

### **Primary Program File**

Recommendation 35: One centralized primary file should be created for the CAP Fund Transfer Program. At a pre-determined date each year staff members from the 2 federal agencies should meet to reconcile any and all differences in program documents and create 1 "official" record for that year. As the responsible agency for the program, the official record depository should be maintained, filed, and housed by the FWS.

### **Retrieving and Archiving Files**

Recommendation 36: Beginning immediately, staff at the Phoenix FWS and BR offices should perform a detailed assessment of program files to identify missing files and organize existing files. One centralized project file should be created and organized by project years. This file should include an active and an archived depository. Complete directories should accompany all files. The FWS office should take the lead in this assessment.

<u>Recommendation 37</u>: Duplicate copies of the final documents should be created and filed in separate secure facilities.

<u>Recommendation 38</u>: Important program documents no longer needed on a regular basis should be clearly identified and archived in a permanent archive site, and made available to the public. This would include documents previously submitted to Paul Marsh.

### Reporting

<u>Recommendation 39</u>: Progress reports and project status tables should be completed for each fiscal year; "formalized" in style and format, completed by the same date, and cover the same time periods each year. All tables, appendices, and associated files for each annual report should be clearly identified, labeled, and attached to each report. Status tables are critical and must be maintained.

<u>Recommendation 40</u>: The reports should track progress, accomplishments, and significant mileposts for each project and clearly identify elements of planning documents addressed. Significant findings should be identified and highlighted. Status changes for projects should be clearly identified and accompanied by justification for that change.

<u>Recommendation 41</u>: Interim reports should continue to be required for all principal investigators each year. Efforts to obtain these reports must be increased. Annual progress reports are important products and must accurately summarize the program. They are heavily dependent upon timely and accurate interim reports.

### **PROJECT IMPLEMENTATION**

<u>Recommendation 42</u>: The committees should evaluate, scope, and hold a multi-agency public process on potential for planning and project implementation at the scale of sub-basins or watersheds.

<u>Recommendation 43</u>: WMI recommends the Program make additional efforts to incorporate CAP Fund Transfer Program actions into a larger, comprehensive, regional native fish recovery effort. Opportunities to use program funds to leverage other funding should be automatically considered prior to project approval.

Recommendation 44: The suite of WMI recommendations outlines a program environment in which individual and committee roles and responsibilities are clearly defined; decision-making is formalized, disciplined and strategic; and program accomplishments are quantifiable and defendable. WMI recommends that strict adherence to such a work environment will minimize the acrimony that characterized the program's past and increase the likelihood of recovery of native fishes in the Gila basin.

### LITERATURE CITED

- FWS (U.S. Fish and Wildlife Service). 1991a. Spikedace (*Meda fulgida*) recovery plan. Albuquerque, New Mexico: U.S. Fish and Wildlife Service. 38pp.
- FWS (U.S. Fish and Wildlife Service). 1991b. Loach minnow (*Tiaroga cobitis*) recovery plan. Albuquerque, New Mexico: U.S. Fish and Wildlife Service. 38pp.
- FWS (U.S. Fish and Wildlife Service). 1998a. Razorback sucker (*Xyrauchen texanus*) recovery plan. Denver, Colorado: U.S. Fish and Wildlife Service. 81pp.
- FWS (U.S. Fish and Wildlife Service). 1998b. Gila topminnow (*Poeciliopsis occidentalis occidentalis*) revised recovery plan (draft). Albuquerque, New Mexico: U.S. Fish and Wildlife Service. 89pp.
- FWS (U.S. Fish and Wildlife Service). 2002. Razorback sucker (*Xyrauchen texanus*) recovery goals: amendment and supplement to the razorback sucker recovery plan. Denver, Colorado: U.S. Fish and Wildlife Service. 113pp.

### **APPENDIX 1**

### PERSONAL INTERVIEW

#### **GUIDANCE DOCUMENT**

1. Describe the thinking and process that led to establishing the program priorities and funding criteria in the Long-Term Guidance document.

#### **STRATEGIC PLAN**

2. Describe the relationship between the Long-Term Guidance document and the Strategic Plan.

#### RECOVERY PLAN

3. Tell us how the recovery plans for the 4 species are used in development of the guidance document, strategic plan and in prioritization and selection of projects.

#### IDENTIFICATION/SELECTION OF PROJECTS

4. What process is used to identify and prioritize potential projects?

### PROJECT DELETION

5. Prior to a decision on whether to delete a project, what written materials are made available to committee members to describe project progress in relation to objectives and expenditures in relation to the budgeted amount? Can these materials be made available to us?

#### PROGRESS REPORT

6. Are the Progress Reports adequate to provide Committee members the information needed to be effective in their jobs?

#### PROJECT IMPLEMENTATION AND EVALUATION

7. How do completed studies or study results inform subsequent decision-making by the Technical and Policy Committees?

### **COMMITTEE OPERATIONS**

8. Describe the working relationship between the Technical Committee and the Policy Committee. In other words how do the two committees interact both formally and informally?

### **PROJECT ADMINISTRATION**

9. Is overall project administration and record keeping sufficient for you to be effective in your role as a committee member?

### **OTHER**

10. Is there anything else you would like to tell us about with regard to the CAP Fund Transfer Program?

### **APPENDIX 2**

### PHONE INTERVIEW

#### INTRODUCTION

- a. History of WMI
- b. Purpose of Review
- c. Explanation for the need for conference call
- d. Sidebars of the review
  - i. Confidentiality
  - ii. Review report goes to FWS
- e. Focus question on interview: Were you actively involved in the writing and development of the Strategic Plan and Long Range Plan for the CAP Fund Transfer Program?

#### 2. IF NOT INVOLVED:

- a. Describe how decisions relative to project selection were made in the early years of the CAP Fund Transfer Program. Were there any written or unwritten guidelines?
- b. From your perspective, what do you think is the most effective process for existing technical and policy committees to request and receive input from outside experts?
- c. Please provide us any other information or comments you think would be useful in our evaluation of the CAP Fund Transfer Program.

### 3. IF INVOLVED IN THE DEVELOPMENT OF THE STRATEGIC PLAN

### **GUIDANCE DOCUMENT**

1. Describe the thinking and process that led to establishing the program priorities and funding criteria in the Long-Term Guidance document.

### STRATEGIC PLAN

2. Describe the relationship between the Long-Term Guidance document and the Strategic Plan.

#### RECOVERY PLAN

3. Tell us how used the recovery plans for the 4 species are used in development of the guidance document, strategic plan and in prioritization and selection of projects.

### **IDENTIFICATION/SELECTION OF PROJECTS**

4. What process is used to identify and prioritize potential projects?

#### PROJECT DELETION

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6. Are the Progress Reports adequate to provide Committee members the information needed to be effective in their jobs?

### PROJECT IMPLEMENTATION AND EVALUATION

7. How do completed studies or study results inform subsequent decision-making by the Technical and Policy Committees?

#### **COMMITTEE OPERATIONS**

8. Describe the working relationship between the Technical Committee and the Policy Committee. In other words how do the two committees interact both formally and informally?

### **PROJECT ADMINISTRATION**

- 9. Is overall project administration and record keeping sufficient for you to be effective in your role as a committee member?
- 10. Is there anything else you would like to tell us about with regard to the CAP Fund Transfer Program?

WRAP UP AND THANKS.

## **Appendix 3: Project Data**

				Spi	kedace	Loach	nminnow	Gila to	pminnow	RB S	Sucker							
					ery Plan		ery Plan	Recov	ery Plan		ery Plan		Gui	dance Docu	ment		Strat	Plan
	F37	g, ,	F 1'	m 1	D.: ::	T 1	D : :				D: :	Sub- All 4 Mult GOAL priority spp Spp			0.0 1	G 1	01:	
T_P	FY	Status	Funding	Task	Priority	Task	Priority	Task	Priority	Task	Priority		priority	spp	Spp	OnGround	Goal	Obj
3-1	1997	Completed	\$26,054	1.6	1	1.6	1					1	1.4	0	1	0	1.1	1.1
3-2	1997	Ongoing	\$35,000	2.1	1	2.1	1					1	1.4	0	1	1	1.7	1.7
3-3	1997	Completed	\$5,000					1.1	1			1	1.3	0	0	1	2.1	2.1
3-4	1997	Deleted	\$75,000					1.21	1			1	1.4	0	1	0	1.1	1.1
3-5	1997	Deleted	\$10,000							III	1	1	1.4	0	1	1	2.8	2.8
3-6	1997	Deleted	\$15,000	1.5	1	1.5	1					1	1.4	0	1	1	2.6	2.6
3-7	1997	Pending	\$35,000	1.9	2	1.9	2	1.2, 1.3	2	2511	2	1	1.4	1	1	0	1.8	1.8
3-8	1997	Deleted	\$25,000	4	2					III	2	1	1.4	0	1	0	1.9	1.9
3-9	1997	Ongoing	\$4,000					1.21	2			1	2.4	0	0	1	2.7	2.7
3-10	1997	Completed	\$90,819	7.3.3	2	7.3.3	2					1	1.4	0	1	0	1.7	1.7
3-11	1997	Deleted	\$25,000	2.5	1	2.5	1					1	1.4	0	1	1	1.1	1.1
			, -,	•														
3-12	1997	Completed	\$2,500							2611	2	1	2.3	0	1	1	2.1	2.1
3-13	1997	Completed	\$2,500	1.1	1							1	1.4	0	1	1	1.9	1.9
3-14	1999	Deleted	\$27,000	6.3, 6.4	3	6.3, 6.4	3					1	2.4	0	1	1	2.7	2.7
				0.4	3	0.4	3	1.3	1			_		0				
3-15	1999	Deleted	\$3,000					1.3	1	2622	2	1	1.4		0	1	1.1	1.1
3-16	1999	Completed	\$15,000							2623	2	1	2.4	0	1	0	3.9	3.9
3-17	1999	Completed	\$7,500			1.1	1		•			1	2.4	0	0	1	1.1	1.1
3-18	1999	Deleted	\$5,000	2.3 1.1,	2	2.3 1.1,	2		2		2	1	1.4	1	1	0	1.7	1.7
3-19	1999	Pending	\$15,000	1.2	1	1.2	1					1	1.4	0	1	1	1.1	1.1
3-20	1999	Deleted	\$10,000							2611	2	1	2.3	0	0	0	1.3	1.3
3-21	1999	Completed	\$51,927		0		0		0		0	1	1.4	1	1	0	1.4	1.4
3-22	1999	Deleted	\$5,000							2611	2	1	2.3	0	0	1	2.1	2.1
3-23	1999	Deleted	\$80,000							2611	2	1	2.3	0	0	1	2.1	2.1
3-24	1999	Completed	\$45,000	8.4	3							1	2.3	0	0	0	1.3	1.3
3-25	1999	Completed	\$39,268														NA	
3-26	2000	Deleted	\$27,200	8.4	3							1	2.3	0	1	1	2.1	2.1
3-27	2000	Completed	\$5,790		0		0		0		0	1	1.4	1	1	0	1.7	1.7
3-28	2000	Deleted	\$10,000					2.1	1			1	1.4	0	0	1	2.5	2.5
3-29	2000	Ongoing	\$88,000		0		0		0		0	1	1.4	1	1	0	1.4	1.4

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3-30	2000	Completed	\$45,000	8.4	3							1	2.3	0	0	0	1.3	1.3
3-31	2000	Deleted	\$200,000					1.4	1			1	1.4	0	1	1	3.5	3.5
3-32	2001	Deleted	\$100,000	1.10	2	1.10	2					1	1.4	0	1	1	2.8	2.8
3-33	2001	Deleted	\$125,000	8.3	3	8.3	3					1	2.3	0	1	1	2.2	2.2
3-34	2001	Completed	\$5,000					1.1	1			1	1.3	0	0	1	2.1	2.1
3-35	2001	Completed	\$14,493														NA	
3-36	2002	Completed	\$231,702			8.4	3					1	2.3	0	0	1	1.3	1.3
3-37	2002	Ongoing	\$10,000					2.2	1			1	2.4	0	0	1	2.7	2.7
3-38	2002	Ongoing	\$30,000	6.3	3	6.3	3					1	2.4	0	1	1	2.7	2.7
3-39	2002	Pending	\$15,000	6.3	3	6.3	3					2	2.4	0	1	1	2.7	2.7
3-40	2002	Ongoing	\$2,500					1.1	1			1	2.4	0	1	1	2.7	2.7
3-41	2002	Ongoing	\$2,500					2.2	1			1	2.4	0	1	1	2.7	2.7
3-42	2002	Ongoing	\$2,500	6.3	3							1	2.4	0	0	1	2.7	2.7
3-43	2002	Ongoing	\$5,000														NA	
3-44	2002	Completed	\$5,000					1.1	1			1	1.3	0	0	1	2.1	2.1
3-45	2002	Pending	\$35,000	8.3	3	8.3	3	0	0			1	2.4	0	1	0	1.6	1.6
3-46	2002	Ongoing	\$120,000									1	2.4	0	1	0	1.10	1.10
3-47	2003	Pending	\$5,000	6.3	3	6.3	3					1	2.1	0	1	0	2.7	2.7
3-48	2003	Ongoing	\$5,000	8.2	3	8.2	3					1	2.4	0	1	1	2.1	2.1
3-49	2003	Pending	\$35,000	1.1	1	1.1	1					1	2.4	0	1	0	1.1	1.1
3-50	2003	Ongoing	\$75,000									1	2.3	0	1	1	1.3	1.3
3-51	2003	Pending	\$5,000					2.2	1			1	2.4	0	0	1	2.7	2.7
3-52	2003	Pending	\$50,000	2.3	2	2.3	2	3.2	1		0	1	1.4	1	1	0	1.7	1.7
3-53	2003	Completed	\$75,000	6.2.5	3	6.2.5	3	1.5, 2.4	1	1311	1	2	2.2	1	1	0	2.4	2.4
3-54	2003	Ongoing	\$11,000	0.2.3	3	0.2.3	3	2.4	1	1311	1	2	2.2	0	1	1	2.6	2.6
3-55	2003	Deleted	\$11,000							142	1	1	2.4	0	1	1	2.7	2.7
3-56	2004	Ongoing	\$5,000					1.1	1	142	1	1	1.3	0	0	1	2.7	2.1
3-57	2004	Pending	\$5,000	8.2	3	8.2	3	1.1	1			1	2.4	0	1	1	2.1	2.1
3-58	2004	Pending	\$25,000	1.1	1	1.1	1					1	2.4	0	1	0	1.1	1.1
3-59	2004	Ongoing	\$25,000	1.1	1	1.1	1					1	2.4	0	1	0	1.3	1.3
3-60	2004	Pending	\$5,000									1	2.4	0	1	1	2.7	2.7
3-61	2004	Pending	\$5,000									1	2.4	0	1	1	2.7	2.7
3-62	2004	Pending	\$3,000 \$7,500									1	2.4	0	1	1	2.7	2.7
		_		6.2	2	6.2	2	2.2	1									
3-63	2004	Completed	\$4,000	6.3	3	6.3	3	2.2	1	I		1	2.4	0	1	0	2.7	2.7

		_		_		_		_		_	_						_		
3-64	2004	Ongoing	\$5,000					1.1	1			1	1.3	0	1	1	2.1	2.1	ı
3-65	2004	Ongoing	\$40,000									1	2.4	0	1	0	1.10	1.10	ı
3-66	2004	Pending	\$5,000	2.1, 2.2	1	2.1, 2.2	1	3.1	1			1	2.4	0	1	1	3.7	3.7	ı
3-67	2004	Ongoing	\$50,000	2.2	1	2.2	1	5.1	1			1	2.3	0	1	0	1.3	1.3	l
3-68	2005		\$40,000									1	2.3	0	1	0	1.10	1.10	l
		Ongoing	\$40,000 \$167,937	8.3	3	8.3	3	1.1	1	261	2				1	1			l
3-69 4-1	2005 1997	Ongoing Deleted	\$167,937	0.3	3	6.3	3	1.1	1 1	201	2	1	2.3 1.2	0	0	1	2.2 2.6	2.2	l
4-02	1997	Pending	\$5,000					1.21	1			2 2	1.2	0	0	1	2.6	2.6 2.6	l
		_		2.0	1	2.0	1			,,,,	1		1.2			0			l
4-03	1997	Completed	\$20,000	2.0	1	2.0	1	1.0	1	III	1	2		1	1		1.2	1.2	l
4-4	1997	Deleted	\$30,000	1.7	1	1.7	1					2	1.2	0	1	1	2.6	2.6	l
4-05	1997	Completed	\$10,000			1.8	1					2	1.1	0	0	1	2.3	2.3	l
4-06	1997	Pending	\$50,000	3	2	3	2				_	1	1.4	0	1	0	1.9	1.9	l
4-07	1997	Completed	\$262,000	1.7	1	1.7	1	1.214	1	III	1	2	1.4	1	1		1.2	1.2	l
4-08	1997	Completed	\$40,000					1.2131	1			2	1.1	0	1	1	2.3	2.3	l
4-9	1997	Completed	\$50,000														NA		l
4-10	1997	Deleted	\$50,000					1.5,									NA		l
4-11	1997	Completed	\$9,800	6.2.5	3	6.2.5	3	2.4	1	1311	1	2	2.2	1	1	0	2.4	2.4	ı
4-12	1999	Deleted	\$24,000							1311	1	2	1.4	0	1	1	1.2	1.2	ı
4-13	1999	Pending	\$20,000	1.10	2	1.10	2	2.3	1			1	1.4	0	1	1	1.11	1.11	ı
4-14	1999	C1-4-4	\$25,014	6.2.5	2	625	2	1.5,	1	1311	1	2	2.2	1	1	0	2.4	2.4	l
		Completed			3	6.2.5	3	2.4	1		1	2		1	-	0	2.4	2.4	l
4-15	1999	Ongoing	\$120,000	1.8	1	1.8	1	2.4	1	1312	1	2	1.1	1	1	1	2.3	2.3	l
4-16	1999	Deleted	\$120,000			1.8	1					2	1.1	0	1	1	2.3	2.3	l
4-17	1999	Deleted	\$10,000					2.2	1		_	2	2.2	0	1	1	2.6	2.6	l
4-18	1999	Deleted	\$10,000	1.8	1			2.4 1.5,	1	1312	1	2	1.1	0	1	1	2.3	2.3	l
4-19	2000	Completed	\$19,743	6.2.5	3	6.2.5	3	2.4	1	1311	1	2	1.2	1	1	0	1.2	1.2	ı
4-20	2000	Don din a	\$10,000	624	2	624	2			1311,	1	2	2.2	0	1	1	2.6	2.6	l
4-20	2000	Pending	\$10,000	6.2.4	3	6.2.4	3			1312 1311,	1	2	2.2	0	1	1	2.6	2.6	l
4-21	2000	Completed	\$12,922	1.8	1	1.8	1			1312	1	2	1.1	0	1	1	2.3	2.3	l
4-22	2000	Completed	\$8,632	1.8	1	1.8	1					2	1.1	0	1	1	2.3	2.3	l
4-23	2000	Pending	\$4,750					2.4	1			1	1.3	0	1	1	2.6	2.6	l
4-24	2000	Completed	\$50,750	6.2.5	3	6.2.5	3	1.5, 2.4	1	1311	1	2	2.2	1	1	0	2.4	2.4	l
								2.4	1			2		0	1				i
4-25	2000	Deleted	\$99,850	1.8	1	1.8	1	2.4	1	1312	1	2	1.1			1	2.3	2.3	i
4-26	2000	Deleted	\$6,600	1.7	1	1.7	1	2.4	1	1311	1	2	1.4	1	1	0	1.2	1.2	1

4-27	2000	Completed	\$34,507														NA	
4-28	2001	Ongoing	\$94,044	6.2.5	3	6.2.5	3	1.5	1	1311	1	2	1.2	1	1	0	1.2	1.2
4-29	2001	Deleted	\$178,176	1.10	2	1.10	2					1	1.4	0	1	1	2.8	2.8
4-30	2001	Completed	\$14,423	6.2.3	3	6.2.3	3					2	2.1	0	1	1	2.5	2.5
4.21	2001	G 1 . 1		1.0		1.0				1311,		2		0			2.2	2.2
4-31	2001	Completed	\$47,000	1.8	1	1.8	1			1312	1	2	1.1	0	1	1	2.3	2.3
4-32	2002	Ongoing	\$20,000	1.8	1	1.8	1					2	1.1	0	1	1	2.3	2.3
4-33	2002	Ongoing	\$44,133	1.8	1	1.8	1					2	1.1	0	1	1	2.3	2.3
4-34	2002	Completed	\$10,000	1.8	1	1.8	1					2	1.1	0	1	1	2.3	2.3
4-35	2002	Ongoing	\$50,000	1.8	1	1.8	1					2	1.1	0	1	1	2.3	2.3
4-36	2002	Completed	\$23,867														NA	
4-37	2002	Ongoing	\$15,000					1.5	1			2	1.1	0	1	1	2.3	2.3
4-38	2002	Ongoing	\$2,000	6.2.5	3	6.2.5	3	1.5	1	2522	2	2	1.2	1	1	1	1.2	1.2
4-39	2002	Ongoing	\$30,000		0		0		0		0	1	1.4	1	1	0	1.5	1.5
4-40	2002	Completed	\$55,000														NA	
4-41	2003	Ongoing	\$20,000	1.8	1	1.8	1					2	1.1	0	1	1	2.3	2.3
4-42	2003	Completed	\$15,000	6.2.5	3	6.2.5	3	1.5	1	1311	1	2	2.2	1	1	0	2.4	2.4
4-43	2003	Completed	\$140,000	6.2.5	3	6.2.5	3	1.5	1	1311	1	2	2.2	1	1	0	2.4	2.4
4-44	2003	Deleted	\$75,000					1.5	1			2	1.1	0	1	1	2.3	2.3
4-45	2003	Completed	\$11,255														NA	
4-46	2004	Ongoing	\$10,000					2.4	1			2	1.1	0	1	1	2.3	2.3
4-47	2004	Ongoing	\$50,000	6.2	3	6.2	3					2	2.1	0	1	1	2.5	2.5
4 40	2004	G 1 . 1	¢15,000	605	2	605	2	2.4	1	1311,		2	2.2	1	4		2.6	2.6
4-48	2004	Completed	\$15,000	6.2.5	3	6.2.5	3	2.4	1	1312	1	2	2.2	1	1	1	2.6	2.6
4-49	2004	Ongoing	\$10,000					2.4	1	1.3,		2	2.2	0	1	1	2.3	2.3
4-50	2004	Ongoing	\$40,000							2522	1	2	2.2	0	1	1	2.6	2.6
4-51	2004	Pending	\$60,000					1.5	1			2	2.1	0	1	1	2.5	2.5
4-52	2004	Ongoing	\$15,197	1.8	1	1.8	1	1.5	1		0	2	2.2	1	1	0	2.3	2.3
4-53	2004	Ongoing	\$80,000														1.1	1.12
4-54	2005	Completed	\$692	6.2.5	3	6.2.5	3	1.5	1	1311	1	2	1.4	1	1	0	1.2	1.2
4-55	2005	Completed	\$26,000	6.2	3	6.2	3					2	2.2	0	1	1	2.6	2.6
4-56	2005	Deleted	\$26,000	6.2	3	6.2	3					2	2.2	0	1	1	2.6	2.6
4-57	2005	Ongoing	\$140,000	6.2.5	3	6.2.5	3	1.5	1	1311	1	2	2.2	1	1	0	2.4	2.4
4-58	2005	Completed	\$74,000	6.2.5	3	6.2.5	3	1.5	1	1311	1	2	2.2	1	1	0	2.4	2.4