Rocky Reach Fish Forum

Wednesday, 1 October 2014 1:00 – 4:00 p.m. Chelan PUD Fish & Wildlife Conference Room Wenatchee, WA



Meeting called by Steve Hemstrom Notes taken by Heidi Kunz

Chairperson, Tracy Hillman

Attending Representatives:

Hemstrom, Steve	Chelan PUD	(509) 661-4281	steven.hemstrom@chelanpud.org
Irle, Pat (phone)	Ecology	(509) 454-7864	pirl461@ecy.wa.gov
Kerec, Matt (phone)	Alcoa	(412) 553-4361	matthew.kerec@alcoa.com
Truscott, Kirk	CCT	(509) 978-8031	kirk.truscott@colvilletribes.com
Verhey, Patrick	WDFW	(509) 754-4624	patrick.verhey@dfw.wa.gov

Attending Participants:

Hillman, Tracy	BioAnalysts	(208) 321-0363	tracy.hillman@bioanalysts.net
Jackson, Chad (phone)	WDFW	(509) 754-4624 x250	chad.jackson@dfw.wa.gov
Kunz, Heidi	Chelan PUD	(509) 661-4758	heidi.kunz@chelanpud.org
McLellan, Jason (phone)	CCT	(509) 263-1082	Jason.McLellan@colvilletribes.com
Miller, Donella (phone)	YN	(509) 945-0132	mild@yakamafish-nsn.gov
Nelle, RD	USFWS	(509) 548-7573	RD_Nelle@fws.gov

Meeting Minutes

I. Welcome and Introductions

Tracy Hillman welcomed everyone to the Rocky Reach Fish Forum (RRFF) meeting.

II. Review of Agenda

The agenda was reviewed and approved.

III. Review and Approval of Meeting Minutes

Minutes from the 6 August 2014 meeting were reviewed and approved.

Pat Irle requested more time to review the minutes from the 3 September 2014 meeting. Once Tracy Hillman receives Pat's edits, he will add them to those he has received from other members. He will then send the edited September notes with the draft October notes to the RRFF for review. Pat Irle would also like Tracy Hillman to send out the document, "Responses from Sturgeon Experts" with the affiliations of the experts included.

Action Items:

- Tracy Hillman will add the affiliations of the sturgeon experts to the document "Responses from Sturgeon Experts" and send it to the RRFF.
- Tracy Hillman will add edits he receives for the 3 September 2014 meeting minutes and then send the minutes out for review and approval before the 5 November 2014 meeting.

IV. Review of September Action Items

Tracy Hillman asked the members of the RRFF if they would like to start reviewing the Action Items from the previous month at each meeting. RRFF members indicated that this is something they would like to do. Tracy reviewed the Action Items assigned from the 3 September 2014 meeting.

- All edits/comments on the draft August meeting minutes are due to Tracy Hillman by 4
 September. Complete.
- Tracy Hillman will e-mail the draft August meeting minutes with edits along with the draft September meeting minutes to the RRFF for approval at the 1 October meeting. **Complete.**
- Lance Keller will send the 2013 final report from Blue Leaf Environmental to Tracy Hillman for distribution to the RRFF. **Complete.**
- Lance Keller will talk to UBC on how they tailored the EcoSim model to fit white sturgeon management. **Ongoing.**
- Tracy Hillman will work with Chad Jackson on writing a primer on bioenergetics modeling. First
 Draft Complete.
- Tracy Hillman will e-mail Chad Jackson a reminder to add an introduction to the revised 2015 juvenile sturgeon stocking proposal. Complete.
- Tracy Hillman will distribute the revised 2015 juvenile stocking proposal to the group for their review. The RRFF will submit their vote on the revised proposal by Wednesday, 17 September. Complete. The proposal passed unanimously.
- Tracy Hillman will send the white sturgeon expert panel documents and the February white sturgeon workshop notes to the RRFF. Complete. Tracy will add the affiliations of the sturgeon

experts to the expert panel document.

- Steve Hemstrom will check on dewatering of Tumwater Dam and identify a good date for a tour this winter. **Ongoing.**
- Steve Hemstrom will check to see if Tumwater Dam had an auxiliary water supply pathway to the forebay. **Ongoing.**
- Comments on Steve Rainey's memo need to be submitted to him by Friday, 12 September.
 Reviewers should send a courtesy copy of their comments to Steve Lewis. Complete. Steve
 Rainey submitted a revised memo based on feedback from the RRFF.
- Tracy Hillman will work with Chad Jackson on writing a primer on bioenergetics modeling. First draft is complete.
- Tracy Hillman will keep the Bull Trout Tumwater Dam issue on the agenda for future discussion.

 Ongoing.

V. Aquatic Invasive Species

New Zealand Mudsnails

Tracy Hillman reported that WDFW found New Zealand Mudsnails around the Ringold Hatchery and raised the question about whether they are spreading up the river and asked what WDFW is doing to contain or eradicate the mudsnails from the hatchery. Chad Jackson reported that WDFW has found New Zealand Mudsnails in the Ringold water source (springs). WDFW is looking at how to decontaminate Ringold Hatchery and how to prevent any re-infestation. WDFW is also checking other locations where live fish from Ringold Hatchery have been transplanted. So far, they have not found any contamination in these areas. Chad Jackson speculated that in order to decontaminate areas that have been infected with the mudsnail, the earthen ponds would need to be drained and if necessary treated with a chemical to kill the snails. Patrick Verhey suggested that freezing has also been used to kill the snails. Pat Irle stated that when dealing with an invasive species, WDFW is responsible for the fauna and Ecology is responsible for the flora.

Chad Jackson suggested that he could have somebody from the WDFW Aquatic Invasive Species (AIS) Unit speak to the RRFF. RRFF members indicated that they would be interested in learning more about the colonization rates of New Zealand Mudsnails. Chad Jackson will check the WDFW AIS "Summary of Findings" to see what actions WDFW plans to take at their facilities. Chad Jackson will provide this document to the RRFF. A presentation could be planned if members are still interested after reviewing the document.

Action Item:

 Chad Jackson will provide the "Summary of Findings" on how WDFW will deal with the infestation of New Zealand Mudsnails at the Ringold Hatchery.

VI. Pacific Lamprey

Rocky Reach Project Effects (No Net Impact)

Steve Hemstrom said that Chelan PUD is still talking internally about NNI. There is a meeting scheduled for 9 October 2014 with the lamprey subgroup and others to discuss NNI. Tracy Hillman stated that these meetings are open for anybody to attend.

Action Item:

• Steve Hemstrom will send out the time and place of the lamprey subgroup meeting along with the purpose of the meeting and the objectives.

Pacific Lamprey at Tumwater Dam

Tracy Hillman reported that Steve Rainey updated his memo on his site visits to Tumwater and 3-Mile Dams based on comments from the RRFF. The revised memo was sent to the group for review. In an email, Steve Lewis asked Tracy to remind the RRFF that the memo should be used as an information packet when discussing passage issues for lamprey at Tumwater Dam. RD Nelle addressed some of the comments he made on Steve Rainey's memo. RD Nelle noted that his main comment on the memo is that adult lamprey are in Tumwater Canyon. One lamprey was documented on video at Tumwater Dam in November of 1998. Information from tagging studies in other areas indicate that this is not when lamprey typically migrate. RD Nelle reported that in studies completed pre-1998, lamprey were occasionally seen on video. Steve Hemstrom believes that the fishway was modified in 1985. Steve Hemstrom will provide a link to a report completed in 1983 by Bonneville Power Administration (BPA) titled, "Natural Propagation and Habitat Improvement – Washington Volume IIA – Tumwater Falls and Dryden Dam Fish Passage Final Report, 1983." This report does not provide a lot of information on Pacific lamprey, but does provide historical information on Tumwater Dam.

RD Nelle stated his concern that Steve Rainey's memo reports that the reason adult lamprey are not present at Tumwater Dam is because of WDFW operations at the facility. RD Nelle stated that it is not known if the reason lamprey are not present is because of WDFW operations, or the modification of the fishway, or both. Steve Hemstrom agreed.

Kirk Truscott asked about the run timing of lamprey at Tumwater. RD Nelle said that he believes adult lamprey would move through Tumwater in August or September. He noted that lamprey could pass Tumwater in the first year that they migrate or they could wait (overwinter) in freshwater and move up the next year to spawn. Kirk Truscott believes it might be worthwhile to look at trapping data and operations at Tumwater from WDFW studies conducted in the mid-2000's. RD Nelle has requested these data, but has not been successful on getting metadata on operations there. It is his understanding that things were shut down and fish had to go through the steeppass most of time. RD Nelle commented that no sampling took place between the time of the fishway modification and the trapping operations,

so it is unknown how either affected lamprey passage.

Kirk Truscott asked if there is any literature on passage of lamprey through steeppass denils. RD Nelle commented that it really depends on how steep the steeppass is. He commented that the steeppass at Tumwater does not appear to be in a good location. He stated that adult lamprey passage is possible and some have done it, but that the Tumwater steeppass is fairly steep compared to others, which may make it more difficult for lamprey passage. RD Nelle stated that it would be interesting to study this issue. He stated that Tumwater has been open at night and that some lamprey may have passed but he has not been able to do any sampling.

Tracy Hillman asked the group if they have a direction they would like to go with this issue. RD Nelle suggested to study where the lamprey might congregate at Tumwater and then try to help facilitate their passage. He would also like to do a site visit when the dam is dewatered in order to evaluate the ladder and where the lamprey might want to pass. Steve Hemstrom said that a tour can be arranged. Steve Hemstrom stated that the only relationship of Tumwater to the Rocky Reach License is the trapping of broodstock for the hatchery programs. If there was no trap at Tumwater, there would be no need for the fishway to be part of the License.

Tracy Hillman will keep this issue on future agendas. Tracy noted that the Forum may want to invite Mary Moser, a noted expert on lamprey passage, to the site visit. RD Nelle also suggested inviting Aaron Jackson. Steve Hemstrom expressed concern that there are no pheromones upstream to attract the lamprey even if they are able to pass the dam and referenced articles that support this theory. Steve is not convinced that helping them pass the dam will solve the problem. RD Nelle stated that lamprey were there historically and something happened in recent times to change that. There was some disagreement about whether or not fixing passage at Tumwater will fix the problem. Steve Hemstrom suggested that the group could discuss this issue further after they have toured the dewatered facility. There was discussion about studying the effects of releasing adult lamprey upstream and downstream from Tumwater Dam.

As a final note, Steve Hemstrom wanted to make it clear that there was not a fishway on the right bank at Tumwater. The structure on the right bank was an old trash sluiceway.

Action Items:

- Steve Hemstrom will provide a link to the report, "Natural Propagation and Habitat Improvement – Washington Volume IIA – Tumwater Falls and Dryden Dam Fish Passage Final Report, 1983." Tracy Hillman will send the link to the RRFF.
- Steve Hemstrom will provide a paper titled, "Trapping Effects and Fisheries Research, A Case Study of Sockeye Salmon in the Wenatchee River, USA." Tracy Hillman will send the paper to the RRFF.
- Steve Hemstrom will try to arrange a visit of Tumwater Dam when the fishway is dewatered.

Regional Implementation Planning Process

RD Nelle reported that not much has happened lately with the regional implementation planning process. For reporting, they are currently evaluating the use of a template developed in California. The Methow and Okanogan meetings still need to take place. RD Nelle is hoping they will take place by December.

Wanapum Response: Rock Island Lamprey Passage Structures

Steve Hemstrom reported that there is no new information at this time. He said that the denils are working and fish are passing. There was a lamprey detected at Wanapum Dam that was detected five days later at Rocky Reach Dam. He did not have an update for the middle ladder at Rock Island Dam. Tracy Hillman will contact Lance Keller and see if Lance can schedule a date when the RRFF can tour the denils at Rock Island Dam. Steve Hemstrom reported that Lance Keller is currently working on the October Interim Fish Passage Plan (IFPP).

Action Item:

Tracy Hillman will contact Lance Keller to identify a good time to tour the denils at Rock Island
 Dam.

Grant PUD Adult Trap and Haul: 2014 Rocky Reach Tagging and Initial Detections Update

Referencing his preliminary report, "2014 Rocky Reach Adult Pacific Lamprey Preliminary HDX PIT Detection Summary," Steve Hemstrom reported that Chelan PUD worked with Grant PUD to get access to Pacific lamprey trapped at Priest Rapids and Wanapum dams as part of Grant's trap and haul program for the Wanapum Dam Response. Grant PUD transported a total of 2,011 adult Pacific lamprey upstream of Rock Island Dam between 17 July and 18 September. Of those, 1,725 were untagged and released in the Rock Island Reservoir at Kirby Billingsley Hydro Park. A total of 286 adult lamprey were transported to the Juvenile Bypass facility for tagging at Rocky Reach Dam. Of these, 276 lamprey were tagged between 31 July and 18 September. The tagged fish were released at Confluence Park just upstream from the Wenatchee River. Steve Hemstrom noted that the tagging work in 2014 increased the HDX sample size by more than 1,100% over the 2012-2013 sample size.

Steve Hemstrom noted that there are a lot of lamprey passage data at Rocky Reach to analyze. He said that so far, there have been 227 unique lamprey detections at the top of Rocky Reach; 212 (76.8%) of those were from the 276 PIT tagged at Rocky Reach and released at Confluence Park. The fastest individual travel time from Confluence Park to first detection at Rocky Reach was 16 hours and 15 minutes; the longest was 5 days, 13 hours, and 28 minutes. Steve Hemstrom said that if a fish is detected again lower in the fishway system after it has reached the fishway exit at Rocky Reach Dam, it is identified as a lamprey that did not pass Rocky Reach Dam. He said that the definition of "successfully

passing the fishway" is any fish that has been detected at the last antenna (RR07) and not again anywhere else downstream.

Steve Hemstrom stated that 15 of the Pacific lamprey detected at the top of Rocky Reach were not tagged by Chelan PUD. These are preliminary data because all it shows is that the fish reached the top, it does not account for fish that may have gone back down through the ladder or that make it to the forebay and then go through a turbine unit back downstream. The final data will show their final fates, including how long it took them to pass, if they successfully passed or did not pass the project, and where they finally ended up in the system. Chelan PUD will continue to download data weekly through October and then bi-weekly in November depending on the number of new detections. Steve Hemstrom is encouraged by the number of adult lamprey that migrated successfully upstream from Confluence Park (five miles downstream) to Rocky Reach Dam, through the Rocky Reach fishway, and finally were detected at the exit of Rocky Reach Dam fishway. Steve Hemstrom is working with the Geographic Information System (GIS) Department at Chelan PUD to track the path of the tagged fish in the fishway. Steve Hemstrom identified a full duplex adult PIT-tagged fish that was sampled in the Rocky Reach Juvenile Bypass System on 21 July 2014. It was determined to be a Douglas PUD fish that was tagged 30 July 2013. It was released five miles downstream from Wells Dam as part of Douglas PUD's 2013 lamprey passage study. It was never detected in the Wells fishway.

Modeling Lamprey/Sturgeon Interactions

Tracy Hillman referred to his and Chad Jackson's action item to write a primer on bioenergetics modeling. Earlier today he e-mailed a draft of his report, "A Primer on Bioenergetics Models," to the RRFF. Tracy noted that although this is a product from both him and Chad Jackson, Chad has not had time to review and comment on the primer. Tracy stated that the purpose of the primer was to (1) provide an overview of bioenergetics, (2) describe briefly the core processes in the bioenergetics models, (3) describe how bioenergetics for individual fish can be scaled up to populations, and (4) identify what information will be needed to model the effects of sturgeon predation on juvenile and adult lamprey. Tracy provided a brief review of the draft report and identified the information needed to model sturgeon energetics within the Rocky Reach Project Area.

Tracy Hillman said that he and Chad did not have time to search the literature for studies that modeled the energetics of white sturgeon. Therefore, they did not include any information on the energetics of sturgeon in the primer. Jason McLellan commented that bioenergetics models have been used with white sturgeon and he cited two papers that he will forward to Tracy to share with the RRFF. RD Nelle questioned how a diet analysis would be obtained. Jason McLellan explained that white sturgeon have a spiral gut making lavage techniques challenging. He stated that the best information on diet can be gathered from euthanizing fish and removing the gut. He did not think that would be an option with the limited number of adults in the Rocky Reach pool. Jason indicated that he would send Tracy some papers describing lavage methods for sturgeon.

Tracy Hillman commented that the model can be as complex or as simple as one wants depending on

how many parameters are included in the model. Steve Hemstrom stated that the RRFF could make a decision about euthanizing a few of the juvenile lamprey in order to study their diet. He also discussed the potential difficulty of knowing what the carrying capacity of the reservoir is, and the issue of adding large numbers of pikeminnow carcasses (from the pikeminnow removal program) to the system. Tracy Hillman asked the group to please provide comments after they have read the primer.

Action Items:

- Jason McLellan will send Tracy Hillman articles on sturgeon energetics and lavage techniques.
 Tracy will forward them to the RRFF.
- The RRFF will review the draft primer and discuss next steps during the November meeting.

Future Planning

Steve Hemstrom reported that Chelan PUD has been discussing internally how to achieve the No Net Impact (NNI) standard. Chelan PUD may or may not be able to conduct all the Project effect studies that were envisioned. Chelan PUD may be able to assess the juvenile and adult components of passage at the dam, but the effect on juveniles in the reservoir will be a tough one to address. It needs to be determined whether it's a reservoir problem that is causing a problem for adults, or whether it is just fish eating fish. Steve Hemstrom reported that the juvenile component is the more difficult one in terms of planning. How can it be determined what the effect is, how to fix the effect, and how to determine what Chelan PUD needs to do to achieve No Net Impact. That is the premise of the lamprey plan. Steve Hemstrom stated that they will wire-up the Entiat in order to determine the fraction of adult lamprey that pass Rocky Reach Dam and end in the Entiat River basin. Steve Hemstrom thinks this will happen in March 2015. RD Nelle suggested that Chelan PUD coordinate with people who are already working in the Entiat River. RD Nelle reported that they had found evidence of adult spawning downstream of the existing power supply for the lowest array in the river. He stated that the power is there and it is a good site, but that they will need to discuss any adverse effects of additional noise at the site.

VII. Bull Trout

Bull Trout and Tumwater Dam

Tracy Hillman reported that Steve Lewis would like to keep this issue on the agenda. There are no new updates at this time.

VIII. White Sturgeon

Rearing Update

Chad Jackson reported that both Chelan and Columbia Basin hatcheries have completed their first culls.

The first round of histology samples have been taken from fish at both hatcheries. These samples were sent to the Idaho Fish Health Lab for testing. Chad Jackson is hoping the samples will be processed soon; however, the WDFW contract for those services has not yet been finalized. Fish health reports indicate that the fish are doing fine other than normal observations of certain common pathogens. He reported that they continue to have good numbers within all of the half-sib families.

Donella Miller reported that the fish at Marion Drain are also doing well. She said there are still fish from all 40 families on station. The fish were placed in the ten-foot tanks and they are separated according to the eight different maternal groups.

Monitoring Update

Tracy Hillman reported that Lance Keller provided the RRFF with the final 2013 monitoring report. Steve Hemstrom has the 2014 draft report from Lance Keller, but has not had a chance to look at it. He provided a brief monitoring update from Lance Keller. With the approved stocking number of 6,500 juveniles in 2015, based on half-sibling families in possesson, hatcheries now have production targets. The third of four juvenile indexing events is underway and an overall summary will be available once it has been completed. EcoPath/EcoSim software has been installed on Lance Keller's computer. They have gone through the model once and are looking into each of the metrics of the model and the required data input. The EcoPath/EcoSim portions of the models do different things. The EcoPath model tracks the flow of biomass through the hypothetical ecosystem. EcoSim is the time varying simulation of the model.

2013 White Sturgeon Indexing and Monitoring Report

This final 2013 monitoring report was distributed to the RRFF as reported earlier. There were no additional comments.

Stocking Approach for 2015

Tracy Hillman reported that Chad Jackson was asked to add a brief introduction to his proposal titled, "Revised Proposal on the Number of Juvenile White Sturgeon to Release into the Rocky Reach Project Area in 2015." The revised draft proposal was distributed to the RRFF and members were asked to vote on the proposal by 17 September. Tracy reported that the Proposal was approved unanimously. Although the Yakama Nation supported the proposal, they offered their concerns with the proposal in an e-mail to Tracy Hillman and others. Bob Rose asked Tracy to read their concerns to the RRFF and attach the e-mail to the October meeting notes. Tracy read the e-mail from the Yakama Nation to the RRFF (see Attachment 1).

Tracy Hillman commented that the RRFF needs to determine how they will move forward with Phase II of the Sturgeon Conservation Program. This will include determining how to use the information from the outside experts and how to incorporate the monitoring data being collected within the Project Area.

Chad Jackson suggested that Chelan PUD should hire a consultant to draft a Phase II plan. Steve Hemstrom (CPUD), Pat Irle (Ecology), Jason McLellan (CCT), Patrick Verhey (WDFW), RD Nelle (USFWS), Matt Kerec (Alcoa), and Donella Miller (Yakama Nation) agreed with Chad's suggestion.

Steve Hemstrom asked to comment briefly on the e-mail from the Yakama Nation. Steve Hemstrom stated that Chelan PUD has done a great job of getting the Phase I fish in the reservoir. It took them four years, but they have successfully released 19,500 juvenile sturgeon into the reservoir. He does not think it is a lack of funding. For Phase II, Steve Hemstrom thinks they should find somebody who has the expertise to help the RRFF decide what the stocking numbers should look like and when it should be 6,500 fish or some number lower than 6,500 fish. He is concerned about whether or not the outcome of that effort will keep the group from disagreeing. He does not want Chelan PUD to spend \$30,000 on a consultant and then still be in dispute resolution that year because of different beliefs of what the management plan says. He would like the group to decide if they will follow the recommendation of a consultant before Chelan PUD decides to spend the money. Tracy Hillman suggested that the subgroup convene to work out the issues of using a consultant. This would include identifying the key issues that need to be considered so that the consultant has clear guidance. Tracy Hillman stated that the group may want to move forward after Lance Keller has reported on the EcoPath/EcoSim model. Steve Hemstrom agreed that they could wait one more month to talk about the models and also talk internally within Chelan PUD about the idea of hiring a consultant. Steve Hemstrom agreed to take the lead in coordinating this effort along with Lance Keller.

Phase II Sturgeon Conservation Program – UBC Sturgeon Model

Steve Hemstrom stated that Lance Keller will have an update next month on the University of British Columbia sturgeon model (EcoPath/EcoSim) and then the group will discuss hiring a consultant to help the RRFF move forward with Phase II. Steve Hemstrom commented that different parties feel that there is a difference between a conservation program and a harvest augmentation program for white sturgeon. RRFF will have to come to an agreement that it should be either one or the other or a mix. Steve Hemstrom suggested that everybody should think about what their respective agencies would like the program to be and what they would like it to achieve. Tracy Hillman commented that when he read the White Sturgeon Management Plan it was clear to him that it was first a conservation program, but it also contained language for harvest opportunities. The plan makes it clear that it is a mix of both with an emphasis on conservation. The question is how to move that program forward considering both goals and that the goals may not be fully compatible. Steve Hemstrom agreed.

Action Item:

 Steve Hemstrom will work with Lance Keller on the EcoPath/EcoSim model and discuss their findings with the group at the next meeting.

IX. Next Steps

The next regular meeting of the RRFF will be Wednesday, 5 November 2014 from 1:00 to 4:00 p.m. in the Chelan PUD Second Floor Conference Room.

Attachment 1

E-mail from the Yakama Nation on the 2015 Juvenile Sturgeon Release Number Proposal

From: Bob Rose [mailto:rosb@yakamafish-nsn.gov]

Sent: Friday, September 19, 2014 3:40 PM

To: Tracy Hillman; Tom Skiles; Jackson, Chad S (DFW); Patrick McGuire **Cc:** Donella Miller; Steve Parker; Jeff Korth; John Monahan; Mike Clement

Subject: Re: FW: PRFF: 2015 Juvenile Sturgeon Release Number

Hi Tracy - and all,

The Yakama Nation will vote YES on this matter but we are not at all comfortable with this vote.

We recognize that there is an overwhelming likelihood that we will have sufficient families to provide the total 6,500 juvenile release. To move forward and try to keep peace within the family, this is the only reason for a YES vote.

We would like to remind the PRFF that if, for some reason, we had only 15 half-sibling families (for example) and are then compelled to release a smaller number of fish, this would be, in fact, completely contrary to Ecologies recent Dispute Resolution ruling. We would be in exactly the same place for the same reason as we were last year. The "experts" were clear - it didn't matter. Ecology ruled that there isn't sufficient information to indicate it does matter.

In addition, I also wish to remind the PRFF that Grant PUD has been a champion of this genetic diversity conversation. However we have consistently fallen below the 6X6 cross (goal) within the Management Plan. As we move forward, it is now incumbent upon Grant PUD to meet or exceed this goal. Imposing budgetary constraints is no longer consistent with the WSMP.

Tracy - I'd like to have these comments entered into the Meeting Minutes at the next PRFF meeting.

Thanks.