



December 1, 2008

Mr. Bill Booth, Chairman  
Northwest Power and Conservation Council  
851 SW 6<sup>th</sup> Avenue, Suite 1100  
Portland, OR 97204

Dear Chairman Booth,

On behalf of the PNUCC members I want to once again offer you thoughts on the Council's developing Fish and Wildlife Program. Utilities and industry have a vested interest in improving the survival of fish and wildlife populations in the Northwest and have reviewed the draft Program in this light. We commend the Council for your hard work and diligence to get the draft Program completed when so many other parts of the region's mitigation efforts are yet to be settled. The unique leadership the Council has demonstrated thus far will be needed to work through many of the processes you have outlined as part of the Program going forward.

The changes to the Program PNUCC proposed in April and our input in June were founded on the five principles we have shared with you multiple times. We appreciate that the draft Program acknowledges these principles in several ways. It is more of a guidance document that acknowledges the Program connection to hydropower impacts, recognizes the many other ongoing and new regional fish and wildlife efforts, and looks for opportunities to share costs. We encourage the Council to resist pressures to add details to the Program that reduce its flexibility and adaptability. The Council is the entity best situated to take in the big picture and set a coherent policy course for fish and wildlife mitigation in the region.

This being said we are conscious of the increasing challenges the Council faces to implement the Program. What follows are our thoughts and encouragements to the Council for ensuring the final Fish and Wildlife Program is grounded in sound science and will promote the most cost-effective actions for improving fish and wildlife in the region.

- **We support the Council's emphasis on independent science and use of the Independent Science Review Panel and the Independent Science Advisory Board to assess the scientific aspects of the projects proposed for funding.** The independent science reviews should be used by the Council to inform the Council's policy choices, not define the policy.
- **We agree with the Council that all projects, including those proposed to meet the FCRPS Biological Opinion and BPA's Columbia River Fish Accords, are subject to this science review.** It will help assure our investments are sound and benefiting Northwest fish and wildlife.

- **The Independent Economic Advisory Board should have a more prominent role in the implementation of the Council’s Fish and Wildlife Program.** This group provides the capability to ensure the Program is implemented in a cost-effective manner. As new measures are assessed biologically, they should also be considered from an economic perspective. We understand this group is not being fully utilized and offer to work with the Council and others to make the most of their expertise to benefit the region.
- **PNUCC believes that the Council should clarify how projects are selected for funding when there are disagreements.** It would be useful to add a discussion of how disagreements are resolved between the Council and BPA when they have different opinions about funding projects. We have observed situations where there have been disagreements and there is no agreed-upon process for resolution. Having clarity about project funding decisions between the Council and those implementing the Program will improve the efficiency and cost-effectiveness of the Program.
- **We look forward to working with the Council and others to design useful high-level indicators.** Well chosen indicators will help shape the Program and more narrowly focus the research, monitoring, evaluation and funding. As stated by BioAnalysts in a draft report for PNUCC, “At the end of the day, the HLI’s should not only document the success of the Council’s Fish and Wildlife Program, but also produce clear endpoints where program funding is no longer required and resources can therefore be shifted to other areas.”
- **We recommend the Council set a goal to reduce the amount of research, monitoring and evaluation funded through the Program to no more than 20 percent of its budget and use the additional resources for on-the-ground projects that provide direct benefits to fish and wildlife resources.** Research, monitoring and evaluation now make up 40 percent or more of the cost to implement the Council’s Program. This takes significant funding away from measures that can go directly to help fish. We are urging the Council to find efficiencies in the monitoring and evaluation of projects and to heavily scrutinize the stand alone research being funded by the Council. We concur with the schedule put forth by NW RiverPartners for ramping down research, monitoring and evaluation measures.
- **PNUCC recommends that the Council replace Table 11-4 “Estimated Losses Due to Hydropower Construction” with a tabulation of the wildlife mitigation that has been accomplished to date.** As the Council considers wildlife mitigation we highly recommend that you look back and give credit for the wildlife mitigation that has been accomplished since the Program began. This latest draft does not acknowledge the significant accomplishments for wildlife over the last 25 years. In addition, as you examine the historic accomplishments also include the benefits that have accrued through numerous non-wildlife projects, such as fish habitat restoration.
- **The language that was added in the beginning chapters of the draft Program emphasizing the hydropower impact focus is good and should be carried through into the later chapters and sections.** The Program as drafted does a much better job than in the past of linking recommendations for mitigation efforts to the

hydropower system impacts. We appreciate this change and are confident that this conscious connection will help focus the Program. We are also hopeful it will improve the ability to track which projects are being done to mitigate for which impacts.

- **We recommend that BPA customers participate in the effort the Program suggests for determining the accounting for wildlife benefits.** We recognize the controversy over the habitat crediting issue. While we support a goal of one-to-one replacement of habitat units, the Council has maintained a two-to-one goal and others are pushing for even higher replacement ratios. Bonneville customers have a role in considering and determining the habitat crediting scheme. This is a significant expense in the Program and must be done in a thoughtful, comprehensive manner.
- **We urge the Council to add language to enhance the accountability of those overseeing the Fish Passage Center and those performing the Center's functions.** We are disappointed that the draft Program continues to identify the Fish Passage Center as the specific entity to perform the tasks of smolt monitoring, providing region fish information, etc. The Center has lost credibility and is a divisive presence in the Program. Language changes like those being suggested by NW RiverPartners to address this issue should be incorporated into the Program.
- **In light of the increased demand for renewable resources, the Council should revisit the designated Protected Areas.** It has been several years since the Council considered protected areas. They should evaluate the protected areas and the criteria for determining those areas with an eye on balancing the need for renewable power supply, improvements in technology of building resources and changes in the population and human development.

We look forward to continuing to work with you and the region as this next Program is implemented. Thank you for considering our thoughts and please don't hesitate to contact Shauna McReynolds of the PNUCC staff to discuss any of these points further.

Sincerely,

A handwritten signature in black ink that reads "Jim Sanders". The signature is written in a cursive, flowing style.

Jim Sanders, Benton PUD  
PNUCC Chairman

cc: PNUCC Board of Directors