



October 4, 2006

Mark Walker
Director of Public Affairs
Northwest Power & Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204-1348

Re: PNGC Power comments on Northwest Council Fish and Wildlife Program funding recommendations

Dear Council Members:

As you know, PNGC Power has long advocated for the use of the best available science in all matters of the Fish and Wildlife Program, guided by principles of cost effectiveness. Because our members continue to contribute significantly to the fish and wildlife program through their electric rates, PNGC is deeply interested in seeing effective programs implemented that will most quickly result in meeting the obligations laid out under the Power Act.

We appreciate the Council's efforts over the last year to sort through the hundreds of project proposals that it has received. The region relies on the Council to be a voice for wise program management and push for the best use of the limited funds available. Accordingly, the highest priority projects should complement the efforts of others in the region. We also appreciate the Council's leadership in re-evaluating ongoing projects; the Council should be rigorous in its check backs to ensure the Program is accomplishing its intended results.

Effective management of the program

The Council must resist recommending funding for programs that do not mitigate demonstrably for the impact of the hydrosystem. Similarly, the Council needs to ensure that recommendations for funding stay within the \$143 million budget parameters that have been established through BPA's public process. With this in mind, PNGC objects to a Council planning budget of \$153 million. We believe that implementing a planning budget that exceeds the actual budget sends the wrong signal to all parties involved and reduces PNGC's confidence that our members' significant contributions to the program are being managed effectively.

PNGC is also concerned that this planning budget reduces the Council's flexibility precisely when it is needed the most. As the requirements of the Biological Opinion on remand become clear, the Council should be prepared to prioritize projects that assist in meeting them. As such, until the obligations of the BiOp are understood, projects that require shorter term funding, or funding that can be reassigned should be prioritized. In all cases, the Council should continue to look for creative sources of funding, including cost sharing with others.

Focus on direct and effective projects

The Council should continue to work towards allocating Direct Program funds in harmony with BPA's stated objective (70% for programs of direct benefit (on the ground), 25% for research monitoring and evaluation (RME) and 5% for administration and overhead). PNGC believes that maintaining this focus will provide more positive results for fish and wildlife and still preserve the ability to learn and adapt to new information. Through this allocation the Council should prioritize the RME that addresses critical issues for fish and wildlife in the Basin.

Consistent with this belief, PNGC asks that the Council look seriously at the Comparative Survival Study (CSS). The Independent Scientific Review Panel made several significant suggestions on how to improve this study. The extent of these recommendations, however, combined with the serious concerns that have been raised about its validity and usefulness, call for a complete program redesign, not a band aid approach that leaves many of the problematic elements intact. We propose that funding for tagging fish continue but that funding for the CSS study halt until a new plan is developed by an independent third party.

Additionally, we urge the Council to continue its funding for the data management, warehousing and analysis associated with fish passage by supporting the Battelle/Pacific States Marine Fisheries Commission proposal. This proposal's key advantage is that it explicitly separates policy making from data analysis. It also provides superior oversight and greater accountability for peer reviewed results than previous fish passage analysis programs. Data management and analysis on fish passage is important to the region, so it is unhelpful when the information generated is not useable because it lacks credibility. Reestablishing credibility in this program should be a priority to the Council.

Recognize accomplishments

Finally, the Council should work harder to highlight the good work that is being done in the region on behalf of fish and wildlife. Huge investments are being made, and some good results are being achieved. Greater articulation of the region's accomplishments will better serve all those who have worked so hard to achieve them, in addition to the general public.

Thank you for the opportunity to provide comments on the Council's funding recommendations for its Fish and Wildlife Program. PNGC looks forward to working with you as the Program is implemented.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin S. Banister". The signature is fluid and cursive, with a large loop at the end.

Kevin S. Banister
Manager, Government Affairs and Special Projects