



October 10, 2006

Dr. Tom Karier
Chair, Northwest Power & Conservation Council
705 West First Ave. MS-1
Spokane, WA 99201

Dear Dr. Karier,

On behalf of PNUCC members, thank you for this opportunity to comment on your recommendations for the 2007-2009 Council Fish & Wildlife Program. This program demonstrates the region's commitment to recover and protect fish and wildlife populations. PNUCC members share this commitment both in our individual efforts and through our BPA rates. The Council's program is an integral part of the overall salmon effort that includes the work of utilities, federal agencies, state governments and Native American tribes. Coordination between these entities and amongst the many processes, including the remand of the 2004 Federal Columbia River Power System Biological Opinion, is important to PNUCC members who see that coordination as the best way to achieve the salmon goals of the region.

As we reviewed your recommendations we noticed several budgeting philosophies that are noteworthy. We are pleased that the Council reserved nearly \$11 million over 3 years as a placeholder for future needs as they arise. Yet we feel the program needs to be more adaptable still. Leaving more funds unallocated will increase the flexibility of the program and increase the ability of the Council to nimbly respond to the fluid needs of fish and wildlife populations.

The Council has the ability to remove some of the ambiguity surrounding the Biological Opinion remand process by setting aside more funds for tasks that will be defined through the remand process. To raise the level of reserve funds we urge the Council to identify projects that could be partially funded or delayed and to continue to seek out creative funding sources including cost sharing.

Also, PNUCC members believe that using a planning budget that is \$10 million more per year than the budget level reflected in the BPA rates is shortsighted. Allocating more funding than will actually be available sets up false expectation and removes most, if not all, flexibility from the program. Increased flexibility can also strengthen the coordination between salmon recovery efforts allowing us to achieve overall success sooner.

Through the leadership of the Council, your program has resulted in many improvements that have benefited the fish and wildlife of the region. We propose you further publicize your achievements, they are the result of the hard work of many and the investment of even more.

We can only know where we need to go if we know where we have been. Clearly laid out biological accomplishments will help us to focus our future actions and priorities.

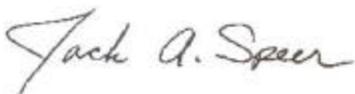
As we move forward we urge the Council to move toward allocating funds based on biology including the 70% on-the-ground, 25% research and 5% coordination funding split. Also, the 70% anadromous fish, 15% resident fish and 15% wildlife funding allocation will put resources where they are needed most without neglecting other species.

We are pleased with the hard look the Council took at all of the projects and the deliberation on how projects would fit together to bring forward the best program possible. And there is more work to be done. The Independent Science Review Panel and others have raised serious concerns about the validity of the Comparative Survival Study and we feel the project is in need of redesign. The data generated from the tagging efforts of this project are important, and we propose that funding for this portion of the project continue while an independent third party formulates a new study plan with which to apply that data.

We also support the proposal from Battelle and Pacific States Marine Fisheries Commission to take over data management and analysis functions associated with fish passage. This project was vetted in an open and fair process last year and it provides the needed separation of data analysis and policy making functions. The Council should not rely on the judicial system to determine their recommendations, but rather take the lead based on the merits of the proposals. It is troubling that the majority of Council members have publicly supported the Battelle/PSMFC proposal and yet the issue remains undecided.

We appreciate the Council's effort over the past year to sort through the staggering number of proposals in order to reach their recommendations. You and your staff should be commended. PNUCC members remain committed to salmon recovery and protection of the region's fish and wildlife and we feel that your fish and wildlife program is an important piece of that effort. Thank you for the opportunity to comment, we look forward to continuing our involvement in implementing your program.

Sincerely,



Jack Speer, Alcoa
Chairman



Jim Sanders, Benton PUD
1st Vice Chairman



Jim Lobdell, PGE
2nd Vice Chairman

cc: Steve Wright, BPA Administrator
Bob Lohn, NOAA Fisheries Regional Director
B.G. Gregg Martin, Corps of Engineers Commander
Governors' Offices