Idaho Falls Power
A Division of the City of Idaho Falls

"A community with its own kind of energy"

June 11, 2008

Mr. Bill Booth, Chairman
Northwest Power & Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204

Dear Chairman Booth,

Thank you for the opportunity to comment on the proposed amendments to the Council's Fish and Wildlife Program. As our customers fund the Council's Program through their power bills, the success of your Program is of vital importance to Idaho Falls Power. We believe that a successful Program will provide a stable mitigation effort for fish and wildlife and stabilize power rates for the region's electricity consumers.

We support the power industry amendments previously submitted and believe that with the Council's leadership the Program can be the guidance document and policy direction needed for the region's fish and wildlife mitigation efforts. For the next Program the Council must reject the proposed amendments you have received that add prescriptive details. In addition, the specifics of other regional documents such as the FCRPS Biological Opinion and memoranda of agreement should be incorporated by reference only. This will allow the Program to remain viable regardless of the status of these documents and ensure the Council and its Program increased influence on Northwest mitigation efforts.

As intended by the Northwest Power Act, we are counting on the Council to create a Program that focuses on *mitigating impacts of the hydrosystem* while ensuring the Program is an integral part of the greater regional fish and wildlife effort. We want to ensure that power customers are not unduly burdened through their power rates with mitigating for all human impacts to fish and wildlife in the Northwest. To the extent the Council's Program leads to mitigation beyond the hydrosystem the Council should ensure that those actions are related back to the objective of *mitigating for the hydrosystem*.

Lastly, the Council is uniquely positioned to require thorough scientific review by the Independent Science Review Panel of all projects recommended for funding. We recommend the Council Program provides the support for this appraisal. Projects such as those being proposed in the agreements related to the FCRPS Biological Opinion, need review to ensure they will deliver the biological benefits they have promised and that they fit with the rest of the Program.

We look forward to continuing to work with the Council and other interested parties so the amended Program creates the best conditions for the region's fish and wildlife resources.

Sincerely,

Jackie Flowers
General Manager

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