



June 11, 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:

Public Utility District No. 1 of Cowlitz County, Washington (Cowlitz PUD) appreciates the opportunity to comment on the proposed amendments to the Council's Fish and Wildlife Program.

Cowlitz PUD provides electric service to 48,400 residential, commercial and industrial customers in Cowlitz County. Our annual electric sales exceeded 4.4 million megawatt hours in 2006, second among Washington PUDs. Cowlitz PUD purchases 90 percent of its wholesale power from BPA.

The success of your Program is of vital importance to our utility; about 20% of every Cowlitz PUD ratepayers' monthly electricity bill pays for fish and wildlife costs incurred by BPA. We believe that a successful Program will provide a mitigation program that is both cost-effective and biologically-effective, and will stabilize power rates for the region's electricity consumers over the long term.

As we look ahead, we see that the Council's Program plays a vital role in the success of our ongoing efforts and provides the guidance needed to balance the many demands for resources to mitigate hydrosystem impacts on fish and wildlife. To be successful and effective, we believe the Council's Program must include the following principles and elements:

- **Specifically address mitigation for the hydrosystem**  
While we understand our obligation to mitigate for losses caused by the hydrosystem, the burden of mitigating for all human impacts to fish and wildlife in the Northwest should not be placed on utility customers. To the extent the Council's Program leads to mitigation beyond the hydrosystem, the Council should ensure that those actions are specifically identified and related back to the specific objective of mitigating for the hydrosystem.
- **Give Council members flexibility to rapidly respond to new information and change implementation as necessary**  
The Council should create a Program that provides guidance principles and sets aside (rejects) prescriptive measures and details which hamper its ability to react quickly. 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. We believe that by operating in this fashion, the Council and its Program would be the most cost-effective and biologically-effective in the region.

- **Prioritize the needs in the region and solicit projects that can meet these needs**  
Creating clear priorities for project solicitation and selection will make a difficult job easier and provide greater certainty that funds are being spent on projects with the greatest merit. Funds spent on fish and wildlife mitigation should be prioritized for projects that directly benefit fish and wildlife. While some degree of research and monitoring is critical, the Council should give preference to projects that actually improve fish and wildlife and their habitat.
- **Create a clear pathway for project solicitation and selection**  
The Program has a finite budget and it is necessary that the funded projects provide the greatest biological benefits while maintaining a definitive link to the hydrosystem.
- **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 thorough review to ensure they will deliver the biological benefits they have promised, mitigate for hydrosystem impacts, and integrate well with the rest of the Program.
- **Seek opportunities to complement other actions in the region to create the greatest biological benefit and provide maximum efficiency**  
By bringing unique perspectives from four states, while understanding the broader work being done throughout the region, the Council has the ability to determine which projects in the region could use additional assistance from its Program. The Council can also determine where other entities could dedicate resources to improve the effectiveness of Council projects already underway. Finding areas where symbiotic relationships can be forged to carry out mitigation actions will extend the value of Council funds and create stronger fish and wildlife responses to those actions.

In addition to comments provided in this letter, we support the previously submitted amendment proposals by the power industry.

Thank you for the opportunity to comment. We look forward to continuing to work with the Council and other interested parties to amend the Program to create the best conditions for the region's fish and wildlife resources.

Sincerely,



Brian L. Skeahan  
General Manager

cc: U.S. Senator Maria Cantwell  
U.S. Senator Patty Murray  
Congressman Brian Baird