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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. Northwest utilities have been working with the region for over two decades to address fish and wildlife mitigation issues. As we look ahead, we see that the Council's Program can play a vital role in the success of our ongoing mitigation efforts and provide the guidance the region needs to balance the many demands for resources to aid fish and wildlife in the region. We support the previously submitted amendment proposals from the power industry with emphasis on the following points.

The Program that guides the Council's decision making needs to give members flexibility to rapidly respond to new information and change implementation when necessary. The Council should create a Program that provides guidance principles and sets aside prescriptive measures and details which hamper its ability to quickly react. A Program structure like this enables the Council to use the best-available information to make its decisions. We believe that by operating in this fashion, the Council and its Program would be the most effective to the region.

BPA customers feel that 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 impact and improve the condition of fish and wildlife. To date, there has been extensive RM&E done in the region that has already enabled fish and wildlife managers to understand where on-the-ground dollars can be effectively spent to impact regional fish and wildlife.

The Council Program's framework should create a clear pathway for project solicitation and selection. The Program has a finite budget and it is necessary that the funded projects are the ones that would provide the greatest benefits while maintaining a definitive link to the hydrosystem. The framework needs to prioritize the needs in the region and solicit projects that can meet these needs. Creating clear priorities for project solicitation and selection will facilitate a difficult job for the Council and provide greater certainty that funds are being spent on projects with the greatest merit.

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,

John Gerstenberger
Manager