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June 12, 2008

Mr. Bill Booth, Chairman  
Northwest Power and Conservation Council  
851 S.W. 6<sup>th</sup> Avenue, Suite 1100  
Portland, OR 97204

Dear Chairman Booth:

The Chelan County Public Utility District and the Douglas County Public Utility District (PUDs) would like to thank the Northwest Power and Conservation Council (Council) for the opportunity to provide comments on the 2008 Columbia River Basin Fish and Wildlife Program Amendment recommendations. This public process is vital to ensuring consistency and collaboration among the numerous programs underway in the Columbia River basin. The PUDs ask that the Council consider including these comments in the amended Fish and Wildlife Program.

The Council is probably aware that Chelan and Douglas PUDs have approved and active Anadromous Fish Agreements and Habitat Conservation Plans (HCPs) for the Rocky Reach, Rock Island, and Wells Hydroelectric Projects that integrate stakeholders' objectives and various methods to achieve HCP fish survival standards, habitat improvements, and hatchery compensation. The HCPs address the Endangered Species Act for listed and non-listed anadromous salmonid species and their habitat as affected by the Projects and utilize an outcome based approach and survival measurements to determine whether a No- Net-Impact standard is achieved. The HCPs have been signed by NOAA Fisheries, the US Fish and Wildlife Service, the Washington Department of Fish and Wildlife, the Confederated Tribes of the Colville Reservation, and the Yakama Nation and have also been incorporated into the FERC licenses of the Rocky Reach, Rock Island, and Wells Hydroelectric Projects agreed to by all the parties including the Department of Ecology.

Chelan PUD also has an approved an active settlement agreement for its Lake Chelan license and a settlement agreement for a new license for the Rocky Reach hydroelectric project pending before FERC. Both agreements have been signed by the HCP parties plus other stakeholders including the Washington Department of Ecology and include provisions for water quality, wildlife and resident fish.

Chelan and Douglas PUDs urge the Council, as they move forward with the development of the Fish and Wildlife Program Amendments and incorporation of the recommendations that have been received, to work with the PUDs to ensure that Council supported programs are coordinated with and supportive of the HCPs and settlement agreement programs which, after ten years of negotiations, are being implemented effectively and successfully. This also ensures opportunities for collaboration are captured and that Council supported programs are not unknowingly inconsistent with our FERC approved collaborative programs.

Furthermore, the PUDs emphasize that this recommended collaboration among the region's programs and agreements is vitally important and possible since we believe that our Habitat Conservation Plans are consistent with the Council's Fish and Wildlife program goals.

Finally, the PUDs suggest that the recommendations provided by various parties do not move the system towards "normative flows". Simply stated, normative flows are run-off with no regulation, draft, or fill. Any drafting of the reservoirs for current operations, (i.e. flood control, and increasing summer flows, and the setting of minimum flows related to fish protection), moves operations away from normative flows. The PUDs suggest that the reference to normative flows is incorrect and that regulating projects to recognized constraints is more appropriate.

The PUDs would like to thank the Council for the opportunity to provide these comments relevant to the recommendations that have been received for the 2008 Columbia River Basin Fish and Wildlife Program Amendment process. The PUDs look forward to working collaboratively with the Council on this amendment process and the implementation of subsequent Fish and Wildlife programs.

Regards,



Tracy Yount  
Director, Natural Resource Division  
Chelan County PUD



Robert W. Clubb, Ph.D.  
Chief of Environmental and Regulatory Services  
Douglas County PUD