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June 10, 2008

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Mr. Bill Booth, Chairman
Northwest Power and Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, OR 97204

Dear Chairman Booth,

Over the past few years fish and wildlife costs have increased significantly and we continue to see escalating fish and wildlife costs and uncertainty as to how the 2008 Biological Opinion for the FCRPS and memoranda of agreement will fit into the integrated Fish and Wildlife Program. As a BPA customer who funds the Fish and Wildlife Program, we are keenly interested in the Council's Program amendment process. The fish and wildlife portion of our BPA power costs amount to over $6 million dollars annually and we want to be able to assure our consumers that these funds are being spent productively and efficiently. We believe the Council is a body in the position to direct a prudent and productive Fish and Wildlife Program. We support the previously submitted amendment proposals from the power industry with emphasis on the following points.

Utilities believe the Council's Program should 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, it should ensure that those actions are reflected in the specific goal of mitigating for the hydrosystem.

The Program that guides the Council's decision making needs to give 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 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.

In order to create the greatest impact and provide maximum efficiency to fish and wildlife mitigation efforts, the Council's Program should seek opportunities to

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complement other actions in the region. 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 or 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.

As a public utility directly accountable to its consumers, we believe the best available science should be utilized in deciding upon fish and wildlife programs and spending. The Council is uniquely positioned to require thorough scientific review by the Independent Science Review Panel (ISRP) of all projects recommended for funding. We recommend that 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.

Thank you for the opportunity to comment. We look forward to working with you throughout this process.

Sincerely,

Dave Muller

Dave Muller
Manager

cc. Mr. Dick Wallace, Council Member
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