



## Pend Oreille County Public Utility District

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June 12, 2008

Mr. Tom Karier  
Northwest Power & Conservation Council  
705 - 1<sup>st</sup> Avenue MS 1  
Spokane, Washington 99201-3909

Dear Mr. Karier:

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 our utility. 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, 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,

A handwritten signature in black ink, appearing to read "Bob Geddes", is written over a horizontal line.

Robert D. Geddes  
General Manager