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June 10, 2008

Mr. Bill Booth, Chairman
Northwest Power and Conservation Council
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Subject: Comments on Proposed Amendments to the Council's Fish and Wildlife Program

Dear Chairman Booth:

Thank you for the opportunity to comment on the proposed amendments to the Council's Fish and Wildlife Program. Franklin PUD is committed to doing our part toward the goal of improving the survival of fish and wildlife populations in the Northwest. The Council's Fish and Wildlife Program plays an important role in this effort, and Franklin PUD appreciates having the opportunity to help shape the future of your Program. 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 regional power industry representatives including PPC and PNUCC, and hope these will be reflected in the Council's amended program.

As was intended by the Northwest Power Act, the vision, objectives and strategies of the Program should address mitigation of hydropower impacts, rather than all human-caused impacts.

We support recommendations that:

- narrow the vision, objectives and strategies of the Program and recognize that ratepayers should pay only for hydrosystem mitigation.
- include Program goals and objectives based on biological performance and environmental characteristics as a replacement for numerical adult return goals.
- elevate the priority of on-the-ground projects for the Council's consideration during project solicitation and selection.
- establish a comprehensive review by the Council of all hydrosystem mitigation actions. The review will provide context and assist in prioritization of actions both on-site and off-site.

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.

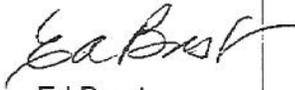
Franklin PUD believes that funds spent on fish and wildlife mitigation should be prioritized for projects that directly benefit fish and wildlife. While some degree of research and monitoring is critical, the Council should give preference to projects that impact and improve the condition of fish and 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.

Franklin PUD would also like to recommend that the Council reject proposed Program amendments that add language or requirements from biological opinions, memoranda of agreement, subbasin plans and recovery plans. These documents have different scopes than the Council's Program and it would be inappropriate and confusing to combine elements in the language of the Program.

We believe by accepting the proposed amendments and operating in this fashion, the Council and its Program would be the most effective to the region. Thank you for the opportunity to comment. We look forward to working with you throughout this process.

Sincerely,



Ed Brost
Manager

LTR: 2008-149