



## Columbia Rural Electric Association, Inc.

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June 12, 2008

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

JUN 16 2008

Dear Chairman Booth,

During this period of 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, we are keenly interested in the Council's Program amendment process. As customers who fund the Fish and Wildlife Program, we want assurances that 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.

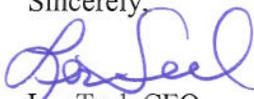
Utilities believe the Council's Program should specifically address mitigation for the hydrosystem. While we understand our obligation to mitigate for losses caused by the hydrosystem, the burden of mitigating for all human impacts to fish and wildlife in the Northwest should not be placed on utility 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 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.

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

Sincerely,

  
Les Teel, CEO

A Touchstone Energy® Cooperative 



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

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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.

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

Sincerely,

  
Les Teel, CEO

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June 12, 2008

Mr. Bill Booth, Chairman  
Northwest Power & Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, Oregon 97204

JUN 16 2008

Dear Chairman Booth,

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.

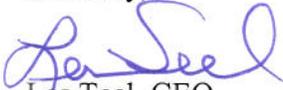
We support the power industry amendments previously submitted and believe that with the Council's leadership the Program can be the guidance document and policy direction needed for the region's fish and wildlife mitigation efforts. For the next Program the Council must reject the proposed amendments 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 of 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,

  
Les Teel, CEO

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