



July 11, 2008

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

RE: F&W High Level Indicators

Dear Bill,

Thank you for the opportunity to comment on the Northwest Power and Conservation Council's (Council) proposed fish and wildlife High Level Indicators.

PPC supports the use of metrics to determine regional progress on implementation of fish and wildlife mitigation efforts. The Council has and should continue to play a key role in providing reports on indicators of success such as those outlined as High Level Indicators in the document released at the June 11 Council meeting in Spokane.

The ability to measure progress and effectiveness of program efforts will be important to ensure success over time. PPC is concerned, however, that adoption of some of these High Level Indicators specifically into the Council's Fish and Wildlife Program (Program) is inconsistent with appropriate Program scope. Most of these High Level Indicators are broad in nature and are therefore useful at the regional level. Several of the proposed indicators, however, go well beyond the legal purview of the Program's mandate to address mitigation of only hydropower impacts, per the Northwest Power Act §4(h)(5).

In order to provide the region with a useful tool to assess fish and wildlife status and mitigation efforts, while maintaining consistency with the Northwest Power Act, the Council should not adopt these High Level Indicators into its Program. Rather, it should continue to provide reports on these metrics, as it has in the past or in an enhanced format, outside of the formal Program. To the extent there is continued effort to make these indicators part of the Program itself, we would welcome the opportunity to discuss the various indicators with you in greater detail.

Again, PPC is very supportive of the Council's pursuit and dissemination of data relating to fish and wildlife conditions for use by the region. PPC believes these indicators should be used outside of the Program context and look forward to working with you to better define these indicators.

Thank you for the opportunity to provide comment.

Sincerely,

A handwritten signature in black ink that reads "Scott Corwin".

Scott Corwin
Executive Director, Public Power Council