



December 1, 2008

Mr. Bill Booth
Chairman
Northwest Power and Conservation Council
851 S.W. 6th Avenue, Suite 1100
Portland, OR 97204-1348

Dear Mr. Chairman:

Thank you for providing PNGC Power with the opportunity to comment on the Northwest Power and Conservation Council's draft Columbia River Basin Fish and Wildlife Program.

As you know, PNGC Power is a cooperative utility owned by its 15 member utilities. We are responsible for procuring and scheduling power and transmission on both a preschedule and a real-time basis to our various member loads. Our members are located largely in rural communities throughout Oregon, Idaho, Washington, and Montana. We serve customers in seven western states.

PNGC Power and its members strongly support making the Council's Fish and Wildlife Program efficient, cost effective, and successful. Northwest ratepayers, including PNGC Power members, pay the majority of the costs Fish and Wildlife Program. For this reason, PNGC Power and its members believe that the Program should be supported by the best-available science and provide the greatest benefit to fish at the lowest possible cost. In particular, we emphasize the following points about the current draft of the Program:

- PNGC Power supports keeping the Program amendment as a general guidance document instead of a document that provides detail about specific organizations or actions. This allows the Council to set more rational fish and wildlife policy decisions, ensures that the Program plays its appropriate role in the region, and allows the Council flexibility for shorter term decision making.
- PNGC Power supports the Council's emphasis on independent scientific review, particularly the use of the Independent Science Review Panel and the Independent Science Advisory Board to assess projects proposed for funding. Our cooperative agrees with the Council's view that all projects, including those proposed to meet the FCRPS Biological Opinion and Bonneville Power Administration's Columbia River Fish Accords, must be subject to scientific review.
- PNGC Power supports reducing the costs of research, monitoring, and evaluation (RM&E) projects under the Program. As you know, RM&E currently makes up approximately 40 percent of the cost of the Program. This is too much. RM&E spending takes funds away from measures that directly help fish and wildlife. PNGC urges the Council to find efficiencies and take other steps to create a Program where no more than 20 percent of costs go to RM&E.
- PNGC Power supports the Council's willingness to address in the draft Program problems associated with harvest and hatcheries. Harvest and hatcheries play a large role in fish survival and recovery. The Council should continue to work for more accountability in these areas.

- PNGC Power supports acknowledging in the draft Program the comprehensive and productive fish and wildlife mitigation accomplishments over the past 25 years. The Council should acknowledge these accomplishments, including such accomplishments as those achieved in fish habitat restoration.
- PNGC Power supports removing specific reference to the Fish Passage Center in the Program. The Fish Passage Center has lost credibility, improperly functions as an advocacy organization, and is a divisive presence in the region. Instead of referencing the Fish Passage Center, the Program should describe the functions that a similar entity should perform.

PNGC Power appreciates the opportunity to provide comments on the draft Program. We look forward to working with the Council throughout this important and timely process.

Sincerely,

A handwritten signature in blue ink that reads "Dan James". The signature is written in a cursive, flowing style.

Dan James
Vice President, Public Affairs & Marketing