



## Public Power Council

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April 4, 2012

Joan Dukes, Chairman  
Northwest Power and Conservation Council  
851 S.W. Sixth Avenue, Suite 1100  
Portland, OR, 97204

Re: ISRP Review of the Ocean Synthesis Report

Dear Joan:

Thank you for the opportunity to comment on the ISRP Review of the Ocean Synthesis Report. The Public Power Council (PPC) represents over 100 consumer-owned utility customers of the Bonneville Power Administration (BPA). As the primary customers of BPA, PPC members and their customers fund the Council's Fish and Wildlife Program (Program) and have a vested interest in ensuring it is efficient, cost-effective, and based on sound science. Additionally, as PPC members are also members of Northwest RiverPartners, PPC supports the RiverPartners' comments submitted by regional tradeheads.

Per the Council's Annual Report to the Governors on BPA's Fish and Wildlife Expenditures, PPC members have invested over \$12 billion since 1978 to mitigate the impacts of the federal hydrosystem on fish and wildlife in the Columbia River Basin. Recently, BPA's annual, Program-related fish and wildlife mitigation costs have been approximately \$230 million.

Currently, BPA estimates that research, monitoring and evaluation (RM&E) makes up 40% of the Council's Program. PPC believes this percentage is too high. Alongside other BPA customer groups, PPC has commented on several occasions that the Council's Program should be modified to reflect the fact it has already enabled collection of a great amount of data, and is now in a position to use that knowledge to spend Program dollars more effectively. To its credit, the Council has exhibited this leadership in the recent review of the "Group A" projects that cut over \$2 million in excessive RM&E. The

Council must continue to make difficult decisions in reducing the amount of Program dollars for RM&E, including decisions related to the recent ocean synthesis report.

Ocean research has helped identify the magnitude of the effect the ocean has on the salmon and steelhead stocks in the Columbia River. This information can be valuable to all concerned with fish management in the region. However, we question why the costs of this research should be borne primarily by BPA customers when the relationship between the research and FCRPS management decisions appear tenuous. PPC believes that because this research supports more broad recovery and management decisions across the region, the Council should ensure that the funding of these projects be shared as a regional responsibility. If no other funding sources are available, the Council should scrutinize the management questions this research provides. Where there is no FCRPS linkage, the Council should phase out funding of these projects.

The Council's Program does not have an infinite funding source. Subsequently, the Council must prioritize projects and determine the greatest RM&E needs at any particular time. This prioritization is critical in assuring that only the most appropriate projects are selected and funded, so that dollars may be redirected to on-the-ground actions that more directly meet the Program's mitigation objectives.

PPC and its members remain committed to mitigating the impacts of the hydropower system on fish and wildlife and appreciate the opportunity to comment on this issue. As representatives of the BPA customers funding the Program, we will remain active participants in Council fish and wildlife processes.

Sincerely,

/s/ Bo Downen

Policy Analyst  
Public Power Council