



Public Power Council

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Steven Wright
Administrator
Bonneville Power Administration
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Re: PPC Comments on the Proposed Memorandum of Agreement between the Kalispel Tribe and the Action Agencies.

Dear Steve,

Thank you for the opportunity to comment on the latest accord. We appreciate your efforts to create a different relationship in the region with the Tribal governments, federal agencies and the fish and wildlife managers. We recognize that working together toward a common goal will often yield more productive results. However, as funders of the fish and wildlife program, we remain concerned about the program's increasing costs.

BPA customers understand their financial responsibility to mitigate for the effects of FCRPS and know that the Kalispel Tribe has been a good partner with the Action Agencies in addressing these impacts. We specifically appreciate the MOA commitment to the work and support that is necessary for a successful USFWS bull trout BiOp. Customers see value in this agreement and are optimistic that a strong partnership between the Kalispels and the Action Agencies will result in a strong bull trout BiOp.

Additionally, we are supportive of the elements of the agreement that create a clearer schedule with US Army Corps of Engineers to complete bull trout passage studies under the current bull trout BiOp and the support the agreement appears to provide for BPA's winter operations at Albeni Falls Dam.

We recognize the value of this MOA but remain concerned about the increasing rate impacts associated with agreements such as this. The direct fish and wildlife program has increased rapidly in recent years and is part of a larger fish and wildlife program that has become the largest single driver of rates. This commitment of approximately \$37 million over the next 10 years appears to keep the fish and wildlife program on this increasing trajectory.

This agreement, like others BPA has entered into in the past few years builds the fish and wildlife program from the bottom up instead of the top down. While designed to create certainty in program costs, the approach of building the program in this manner actually

does the opposite by creating speculation as to what type of agreement BPA may enter into next. A top down approach would create much greater certainty in the future of fish and wildlife costs as it would identify and prioritize the greatest needs and fund them according to budgets.

With specific respect to the Kalispel agreement, we are concerned that there are elements in regard to proposed wintertime operational changes and general principles concerning wildlife mitigation where funding levels remain unresolved. We believe the agreement would be strengthened if it further defined what meets conditions of consideration when determining winter operational changes as well as greater definition of BPA's wildlife obligations.

Additionally, we believe that the term of this agreement may prove problematic in management of the program budget and mitigation goals in that its endpoint is in 2021, beyond the period of the current BiOp and other MOAs that BPA has entered into.

Overall, however, this agreement moves BPA in a positive direction of collaboration with the region. We are hopeful that in moving ahead, BPA seeks ways to continue providing cost effective mitigation efforts to the program while also minimizing increases to the program budget.

PPC appreciates the ability to participate in this process and asks that BPA continue to thoroughly engage customers in fish and wildlife decisions that impact rate payers.

Sincerely,

/s/ Bo Downen

Policy Analyst

Public Power Council