

October 18, 2019

RE: Columbia River Basin Fish and Wildlife Program – Draft 2020 Addendum

Introduction and Overall Considerations

The Public Power Council (PPC) appreciates this opportunity to comment on the Northwest Power and Conservation Council (NWPCC) Draft 2020 Addendum to the Columbia River Basin Fish and Wildlife Program (“Program”). PPC is a trade association representing the non-profit, public utilities that purchase wholesale power and transmission products from the Bonneville Power Administration (BPA). Preference power customers are the ultimate funders of all of BPA’s power costs, including the Fish and Wildlife Program.

PPC members take environmental mitigation obligations extremely seriously. We urge the NWPCC to develop the Program consistent with its statutory direction “while assuring the Pacific Northwest an adequate, efficient, economical, and reliable power supply.”

In addition to the more detailed comments that follow, we would like to emphasize the following overall considerations to the NWPCC in developing the amended Program:

- Nexus to federal hydro system and recognition and the statutory mandate of the NWPCC for Program elements is essential;
- Recognition of other processes such as the requirements of the Endangered Species Act and National Environmental Policy Act compliance;
- Prioritization of projects based on biological and economic impacts;
- Objective, independent, and scientific evaluation of project effectiveness;
- Recognition of program maturity and BPA Strategic Plan, which calls for flat overall spending and prioritization of new projects within existing budgets;
- The Draft Addendum should more fully recognize the accomplishments of the program to date.

Thank you for your consideration of these comments.

Program Scope

The NWPCC Needs to Manage the Program's Focus and Ensure a Hydro Nexus

The Program's purpose under the Northwest Power Act relates directly to, "fish and wildlife, including related spawning grounds and habitat, affected by the development and operation of any hydroelectric project on the Columbia River and its tributaries." As such, the Program and the projects it recommends for funding by BPA must have a clear and obvious relevance to the Federal Columbia River Power System (FCRPS).

The NWPCC program must distinguish between FCRPS impacts and other human impacts. The NWPCC must resist the temptation to expand the Program into measures that are not caused or related to the development of the FCRPS. Doing so will distract from the goals of the program and dilute the effect of available funding from BPA's customers. The Program needs to be focused on its statutory mandates in order achieve what have become increasingly significant mitigation goals.

The NWPCC has an opportunity to prioritize mitigation efforts, eliminate redundancies, and create efficiencies during this process. This is especially true for calls to expand the Program to address new items. The NWPCC should work to focus its mitigation recommendations on resources where improvements can be affected. In addition, any cost savings should be returned to BPA to offset future wholesale power rate increases.

The NWPCC Should Properly Consider Other Plans Pertinent to Fish and Wildlife Mitigation in the FCRPS

The Program has been in existence for more than 30 years and is unprecedented in its magnitude and expense. It is a mature program with extensive breadth. The Program has substantial overlap with FCRPS Biological Opinions (BiOps). The Program should incorporate by reference and ensure consistency with provisions of the most recent BiOps. The NWPCC needs to ensure that the revised Program does not conflict with these important legal requirements.

The Columbia Basin Fish Accords have been negotiated with many of the region's states and tribes. In addition, BPA has pursued a Memorandum of Understanding with the

State of Washington. The NWPCC must ensure that the revised Program incorporates and is not in conflict with these agreements.

Prioritization

Acknowledgment of Finite Budget

As noted by the NWPCC in its annual report on fish and wildlife costs, approximately one-quarter of Bonneville's wholesale power rates is estimated to be associated with its Program. Funding of the direct program currently exceeds \$250 million per year, having nearly doubled over the last decade. This level of funding has reached a critical capacity where its current size is all that the NWPCC and BPA can adequately manage. Further increasing funding significantly increases the risk that funds could be expended unproductively and wastefully.

BPA has a finite budget and both BPA and the NWPCC have a responsibility to provide an, "adequate, efficient, economical, and reliable power supply." The NWPCC should keep these guiding principles in mind to create a program that is in line with the limits of program budgets and can be efficiently and cost-effectively managed. Where increased spending is needed, this should come from reductions in other areas that may have outlived their purpose or usefulness within the program.

The Program Should Identify and Prioritize Mitigation Measures

The NWPCC should establish a methodology to prioritize potential projects and reach agreement on the projects of highest priority before recommending them to BPA. During the project selection phase of program implementation, the NWPCC should select which proposals will meet the objectives identified during project solicitation. Proposals that do not fit into one of the solicitation categories will be either rejected or set aside for consideration as part of an innovative project consideration.

The Independent Science Review Panel (ISRP) should review mitigation proposals and supporting documents in terms of scientific validity and effectiveness toward meeting the interim goal(s) to which the proposal applies. This scientific review must continue and the NWPCC needs to clearly address specific scientific recommendations in changes to the Program. The NWPCC needs to also recognize its responsibility to oversee the management of the Program and critically evaluate recommendations that often

recommend more study and ever-increasing budgets for research, monitoring and evaluation.

The NWPCC should consider the final ISRP reports, other statutory and programmatic considerations and prioritize recommended proposals by how well the proposal meets the following criteria:

- Links to hydropower impact
- Produces in-place, in-kind mitigation
- Improves ecological functionality, alleviates limiting factor(s)
- Produces broad biological benefits
- Provides benefits to ESA listed species/stocks
- Improves the effectiveness of other projects or efforts
- Produces easily measurable results
- Represents a unique work effort (does not duplicate another project or effort)
- Utilizes cost sharing
- Represents the least-cost alternative

This list of prioritized project proposals, categorized by type of action, should serve as the final funding recommendations on program implementation to Bonneville:

Highlight Programmatic Adaptability to Eliminate Underperforming Projects

The NWPCC should continually work to reduce redundancies in monitoring efforts to maximize on-the-ground mitigation efforts. Results from the significant number of past mitigation projects can be used to inform the likely effectiveness of similar projects implemented in the future. Cost savings from these efforts should be returned to BPA to offset future wholesale power rate increases.

Goals

Ensure Best Available Science is Applied to Mitigation Projects

The Program's credibility, especially with the region's utility customers who fund the Program, is supported in large measure by the NWPCC's requirement that the ISRP provide a rigorous scientific review of each measure proposed for funding by BPA. PPC supports the NWPCC's position that proposals for experiments must be based on the best

available science, have appropriate study designs, be subject to review by the independent science panels, and address issues raised by independent scientific and peer review.

Also, PPC agrees with the need to have experiments meet the necessary regulatory approvals consistent with all federal and state laws. Finally, PPC supports the NWPCC considering compatibility of an experiment with other research taking place, including future or planned fish passage improvements at the dams in the Columbia Basin, as well as the effect on the adequacy, efficiency, economics, and reliability of the power system. We urge the NWPCC to apply these standards to all projects in the Program.

Promote Projects with Clear Goals and Success Metrics

The NWPCC should assure that all projects have clearly defines goals, strategies and metrics. The goals should identify the desired outcome of each project and include the plan or method for achieving the stated goals for each project. The metrics developed for each project should be quantifiable measurements that capture the efficacy, performance, or quality of a plan, process, or product.

Clarify Program Goals Per ISAB Recommendations

The NWPCC should continue to implement recommendations from the Independent Science Advisory Board (ISAB) review of the 2014 Program (ISAB Doc. 2018-3). PPC supports the improved adaptive management opportunities identified in the 2020 Addendum. Further, we urge the NWPCC to improve the cost effectiveness evaluation of projects to help identify actions that have the greatest expected benefit per dollar and the highest likelihood for generating those benefits in the shortest period.

Develop Strategy for Better and More Cost-Effective Research, Monitoring and Evaluation

The NWPCC should ensure a robust and efficient Research, Monitoring and Evaluation (RM&E) Program but needs to reduce the overall costs which now represent half the entire cost of the Program. We urge the NWPCC to reallocate a larger percentage of these funds to on-the-ground actions that are known to benefit fish and wildlife populations. The NWPCC should establish a policy framework to prioritize and recommend RM&E projects based on an evaluation of cost, risk, and certainty as

developed by NWPCC staff. The NWPCC should also delineate research from ongoing monitoring, then evaluate if the research is pertinent to adverse effects to the FCRPS. A concerted effort should be made to understand what RM&E results and data are available from other parties in the region, or if joint funding opportunities can be forged. If any of the proposed RM&E research is not pertinent to the nexus of the FCRPS, it should be reduced or eliminated, or partners should be found to share funding responsibilities.

Program Implementation

The NWPCC has a valid role in monitoring program implementation, however BPA is ultimately the entity that must balance program priorities and make adaptations. The NWPCC should carefully consider the tradeoffs between benefits and administrative burden in thresholds for monitoring specific projects.

Specific Program Recommendations

The NWPCC Should Not Support Numeric Goals for Fish Populations That Are Not Directly Tied to FCRPS Operations

The Program should not support mitigation goals that lack scientific credibility. An example is the inclusion of smolt to adult returns (SARs) goals, which are beyond the scope of the Program because they incorporate all sources of mortality throughout the fish's lifecycle, not just those caused by the existence and operation of the FCRPS.

Recent ocean research has demonstrated that ocean conditions are the primary driving factors in adult return rates in the Columbia River Basin. The current SAR goals provide no function in the Program and are an inappropriate basis for the NWPCC to base any decisions in the Program.

The NWPCC Should Continue to Support Ocean Research That Identifies the Effects of Ocean Conditions on Salmon and Steelhead

As stated above, recent research has identified ocean conditions as the primary factor in the adult return rate for Columbia River Basin Salmon and Steelhead. These ocean conditions are not directly affected by any activities related to the construction or operation of the FCRPS. The NWPCC should continue to support incorporating ocean conditions into fish survival estimates and adult return forecasts.

The NWPCC Should Continue to Support Hatchery and Harvest Actions That Do Not Adversely Affect the Recovery of Columbia River Basin Salmon and Steelhead

BPA customers fund significant hatchery fish production in the Columbia River Basin. The NWPCC should continue to promote hatchery production that supports and does not conflict with conservation objectives. The NWPCC should require implementation of the Hatchery Science Review Group recommendations as well as explicitly incorporating adaptive management strategies for Program-funded hatchery efforts.

The NWPCC should continue to support selective harvest methods and policies that reduce the incidental catch of ESA listed and naturally spawning fish but increase harvest of hatchery origin stocks. The Program should assess the extent to which harvest slows recovery of naturally reproducing populations and implement adaptive management strategies for harvest measures in the Program. The NWPCC should also work with the region to assure that artificially produced fish are not exceeding the carrying capacity of freshwater, estuarine and marine habitats.

The NWPCC Should Reduce RM&E Funds Where Possible and Redirect to O&M of Successful Programs if Appropriate

BPA estimates RM&E currently makes up 27% of Program expenditures. There is already a significant body of knowledge available concerning the effects of hydro development on fish and wildlife populations and the value of various mitigation measures. We urge the NWPCC to find efficiencies in RM&E expenditures and reallocate a larger percentage of these funds to on-the-ground actions that are known to benefit fish and wildlife populations.

The NWPCC Should Support Programs That Are Successfully Managing Predator Populations That Prey on Salmon and Steelhead in the Columbia River Basin

Several predator management programs have been developed to protect adult and juvenile salmon and steelhead populations in the Columbia River Basin. The NWPCC should build on the success of past accomplishments and support more aggressive control measures for marine mammals, birds and fish populations that feed on significant numbers of salmon and steelhead.

The NWPCC should support removal of predatory fish species collected in any anadromous portion of the Columbia River, including inside the Boat Restricted Zones (BRZs). Natural Resource managers currently catch pikeminnow in the BRZs in areas where the public cannot access. Staff currently return all other species back to the river, including non-native fish. Non-native, predatory fish should be removed from the river when possible.

Study and Proposals Related to Reintroduction of Anadromy Above Chief Joseph/Grand Coulee Must Be Approached with Substantial Caution and Full Public Transparency

Several juvenile fish collectors have been installed in small reservoirs in the Pacific Northwest. Few, if any existing surface collection systems are meeting their fish collection goals. The forebay above Grand Coulee is much larger than any of the other reservoirs, which will further complicate the operation of a juvenile collector. The NWPCC should assess and share the relevant details about the costs and associated relative success against established metrics developed for other Northwest juvenile fish collectors.

There are still many opportunities to improve existing habitat below Chief Joseph and Grand Coulee Dams. Reintroduction of anadromy should not be prioritized until mitigation opportunities in the lower basin are completed.

The NWPCC Should Not Address Potential Increases in Total Dissolved Gas Limits

Significant biological uncertainty exists around the effects of high total dissolved gas (TDG) concentrations, particularly 125%. High TDG levels result in acute and chronic injuries to juvenile fish and other aquatic organisms. The U.S. Army Corps of Engineers (USACE) is already granted permission to exceed the currently accepted TDG standard of 110%. High spill volumes may also reduce the passage success of adult fish by creating high currents in the dam tailraces as well as increase fallback through the spillways due to elevated spill levels. The Columbia River System Operations (CRSO) Environmental Impact Statement (EIS) is the proper venue to consider any long-term changes to spill regimes and TDG concentration limits

The NWPCC Should Continue to Support Programs That Have Successfully Improved Lamprey Passage Survival and Reintroduced Populations into Extirpated Areas

Several actions to date at the dams have improved lamprey passage survival and

improved lamprey populations in the Lower Columbia River Basin. Reintroduction programs have successfully repatriated lamprey into historical habitats. Further opportunities to repatriate lamprey into former habitats should be explored and implemented where feasible. PPC supports continued expansion of these programs where savings can be found within the existing Program budget.

The NWPCCC Should Continue to Support a Region-Wide Effort to Control Invasive Mussels

Invasive mussels will significantly harm important investments the Region has made on fish passage systems in the FCRPS. PPC supports a continued regional approach to establish a defensive perimeter to keep invasive mussels out of the Columbia River Basin. As a regional issue with potential impacts to multi-purpose federal assets in the Columbia River system, funding for programmatic efforts to control invasive mussel species should be funded at a regional level and not by BPA rate payers.

Thank you, again, for your consideration of these comments.