



June 22, 2020

RE: Columbia River Basin Fish and Wildlife Program – Revised Draft Part I of the 2020 Addendum

Dear Chair Anders:

The Public Power Council (“PPC”), Northwest Requirements Utilities (“NRU”), and the Pacific Northwest Generating Cooperative (“PNGC”) submit these joint comments on the Northwest Power and Conservation Council’s (“NWPPCC”) Revised Draft Part I of the 2020 Addendum (“Revised Draft”) to the Fish and Wildlife Program (“Program”). PPC, NRU, and PNGC are organizations representing the non-profit, consumer-owned 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, NRU, and PNGC continue to support the comments submitted by PPC in October 2019 on the Draft Addendum, and as such, these are attached for reference. We would like to emphasize that given the significant impact of the Covid-19 pandemic on our local communities, financial accountability and program stewardship that is directly aligned with NWPPCC’s statutory mission are more necessary than ever. Projects should be prioritized based on biological and economic impacts, and these should be developed with adaptive management and compatibility with the forthcoming final EIS and Biological Opinion in mind.

Additional Comments on the Revised Addendum

We are concerned that the Revised Addendum overextends the intended purpose of the Program and introduces objectives and performance indicators which should remain in supporting documentation or considered in alternate forums. For example, goals established by other regional groups, such as the Columbia Basin Partnership Task Force, do not belong in the Revised Addendum or the Program. These external goals are not consistent with the statutory scope of the Program and address factors outside of BPA’s control and/or authority. Although the NWPPCC states that it does not anticipate BPA will meet these goals, including them in the Revised Addendum creates confusion as well as false expectations that exceed the NWPPCC’s mandate under the Northwest Power Act (“Act”).

While we understand that the NWPCC is attempting to consolidate information and facilitate regional efforts to protect salmonids and other wildlife, the work proposed extends beyond what is directed in the Act. The NWPCC is funded by public power through BPA's power revenue requirement, with the express purpose of developing a Program to mitigate for the impacts of the hydropower system. To the extent that the NWPCC's work extends beyond its statutory charge, it is using public power funding in an inappropriate manner. If the states, tribes, and other regional stakeholders wish to continue to develop other regional goals, that effort should occur in a separate forum.

Similarly, the Program Vision, while well intentioned, goes beyond the Program's statutory purpose. As mentioned above, the Act directs the NWPCC to adopt a program to mitigate for the impacts of the hydrosystem, but the Vision extends beyond this scope and encompasses the entire Columbia River ecosystem. Subsequently, in interpreting the Vision, the NWPCC has included metrics and targets that do not appropriately focus on the scope of hydrosystem impacts. If the NWPCC intends to interpret the Vision in a way that influences objectives and indicators included in Program documentation, the Vision should be limited in scope.

For similar reasons to those outlined above, specific targets for SARs ratios and total salmon and steelhead returns to the Columbia River, such as the five million fish ten-year rolling average, are not appropriate for inclusion in the Revised Addendum or the Program. Salmonid returns are affected by numerous factors that are outside the impacts of operating the federal hydrosystem and go beyond BPA's influence. It is not useful or practical to set adult fish return goals in the Program that BPA cannot control. Restoring salmonid populations in the Pacific Northwest is a complex policy issue with reach and considerations that extend far beyond BPA and the federal hydrosystem.

In conclusion, we support a strategic approach to setting quantitative goals and monitoring program performance. Along these lines, we are asking that these goals be clearly tied to statutory mitigation obligations that are within the scope of hydropower operations. If goals and indicators are put in place that go beyond the intent of the Act, they should not be included in the Program or Program documentation.

Thank you for your consideration of these comments.