



July 7, 2011

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

Re: Draft 2010 Expenditures Report Columbia River Basin Fish and Wildlife Program

Dear Bruce:

Thank you for the opportunity to submit these comments on your draft report to the Governors on Bonneville Power and the Council's fish and wildlife program expenditures. As you know, RiverPartners cares deeply about these fish and wildlife investments because ultimately it is the region's families and businesses that pay these costs through their electric bills.

Fish and wildlife costs represent one-third of BPA's wholesale power rate to utilities and makeup anywhere from 15 up to 30 percent of customers' bills depending on their local serving utility. It is critically important that we assure the region that this large fish and wildlife restoration program is grounded in solid science; is efficiently and effectively managed, and will provide cost-effective, real and measurable benefits for fish and wildlife impacted by the federal hydropower system.

The Draft 2010 Expenditures Report provides an excellent description of the tremendous investment being made in fish and wildlife since 1978, now totaling \$11.8 billion dollars. It continues to provide the governors, congressional leaders, other policy leaders and the public with a quantitative accounting of the large investments being made to improve fish and wildlife productivity and survival.

RiverPartners is pleased and thanks the Council for continuing to recognize in this report that "lost revenues and power purchase expenses" are legitimate costs. Expenditures associated with changes in hydropower operations are the single largest expenditure, half the total program, at almost \$410 million last year. Customers pay these costs through their electric bills so they are quite clearly are very real costs. Changes in hydropower operations for fish have the greatest affect on BPA's power rates and need to be recognized.

For this and other reasons, we encourage the Council to keep sharp track of the efficacy of federal hydropower operations and make specific recommendations to NOAA and the Action Agencies on how spill operations could be better targeted to benefit fish while reducing hydro system losses. For example, RiverPartners continues to press for implementation of the 2010 Supplemental Biological Opinion (BiOp) which allows spill to be curtailed if few fish are present in the river during August. This is a common sense approach to balancing fish needs with energy needs, costs and other environmental concerns. BiOp operations would result in increases in power generation and revenues with no harm to fish, and minimize carbon emissions as the hydro generation would displace other more polluting resources - an important environmental benefit to the region.

RiverPartners commends the Council for producing this comprehensive report. It continues to be a very valuable source of information that can educate and aid regional decision makers on the costs and benefits of current and future fish and wildlife actions. It provides important transparency and accountability on the use of customer dollars to comply with fish and wildlife laws and regulations. We believe that with rigorous accounting of expenditures, combined with objective measures of biological effectiveness, the Council can help ensure that the region's investments in fish and wildlife are science-based, cost-effective and ultimately result in better fish and wildlife outcomes. Without achieving these equally important goals, protection and recovery efforts will be delayed, and families and businesses will see their scarce dollars wasted.

Thank you for this opportunity to comment on this critically important report.

Sincerely,



Terry Flores  
Executive Director, Northwest RiverPartners

Cc: NPCC members  
Peter Cogswell, BPA  
Lorri Bodi, BPA  
Congressional Offices