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To: Leonard, Nancy
Subject: Comment on Draft MERR report

The strategic plan does not provide appropriate policy level guidance for allocating RME resources. Unless it is substantially revised, the draft plan will ensure that reporting during program implementation is incapable of providing precisely the kind of information that is necessary for the Council to satisfy the requirements of the 1980 Northwest Power Act. Similarly, the implementation framework is not suitable for determining what RME should be conducted. Instead MERR will restrict the focus of RME and reporting activities. Finally, guidance that the third component (implementation strategies) should provide is missing in action. Appropriate tools and strategies are instead replaced by stratagem to shelter action agencies, utilities and other private stakeholders from compliance with the Act and applicable provisions of environmental and procedural law.

For consideration, the strategic plan should use the existing framework provided by the Columbia Basin Fish and Wildlife Authority (habitat) and the Fish Passage Center (survival) to provide policy level guidance for allocating RME resources. The implementation framework should focus on hydroelectric operations, particularly operation of the system to provide load following, power peaking and surplus power for sale off-system. The implementation framework should also consider the impacts on fish and wildlife of the transmission and distribution facilities and operations on the region's fish and wildlife. The implementation strategies must not use 'prioritization' and 'high level indicators' as a ruse for neglecting the impacts of hydrosystem operations at the sub-species level, i.e., individual populations and/or major population groups of threatened/endangered species that are most at risk. Similarly, the prioritization of ecosystem components should address the impacts of day-to-day hydro operations on critical habitat downstream and upstream from the projects.