



Public Power Council

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May 10, 2010

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

Re: Draft Monitoring, Evaluation, Research and Reporting Plan

Dear Bruce:

Thank you for the opportunity to comment on the Council's Draft Monitoring, Evaluation, Research and Reporting Plan (MERR Plan). The Public Power Council (PPC) represents over 100 consumer-owned utility customers of the Bonneville Power Administration (BPA). As the primary customers of BPA, PPC members and their customers fund the Council's Fish and Wildlife Program and have a vested interest in ensuring this program is efficient, cost-effective, and based on sound science.

Per the Council's Annual Report to the Governors on BPA's Fish and Wildlife Expenditures, PPC members have invested nearly \$12 billion since 1978 to mitigate the impacts of the federal hydrosystem on fish and wildlife in the Columbia River Basin. Recently, BPA's annual fish and wildlife mitigation costs have ranged between \$700 million and \$900 million a year, making the fish and wildlife program the largest investment in species recovery and protection anywhere in the world.

Currently, BPA estimates that research, monitoring and evaluation (RM&E) make up 40% of the Council's Program. This percentage is too high. A significant body of knowledge concerning the effects of hydropower development on fish and wildlife populations and the value of various mitigation measures already exists. The Council's Program should be modified to reflect the fact it has already enabled collection of a great amount of data, and now is in a position to use that knowledge to spend Program dollars more effectively. We urge the Council to do this by beginning to redirect funds from RM&E to on-the-ground actions that are known to benefit fish and wildlife populations. We believe a more appropriate use of funds would ultimately achieve a 70/25/5 allocation with 70% dedicated to on-the-ground projects, 25% dedicated to RM&E, and 5% dedicated to coordination projects.

To achieve this goal, PPC supports the prioritization of RM&E as described in the draft MERR Plan, but we are concerned that this prioritization would still be done in a project-by-project, bottom-up manner. PPC believes the Council should instead take a top-down look at its Program in order to determine the greatest RM&E need at any particular time. This prioritization is critical in assuring that only the most appropriate RM&E projects are selected and funded, so

that dollars may be redirected to on-the-ground actions that more directly meet the Program's mitigation objectives.

In addition, the region would be well-served by the Council increasing the involvement of the Independent Economic Advisory Board (IEAB) to assist in establishing an overall RM&E budget that helps drive the Council's redirection of Program funds. One of the ways the IEAB could do this is in helping the Council identify research proposals that are duplicative or inefficient at producing meaningful results.

In view of the tremendous investment and accomplishment of fish and wildlife mitigation over the years, the Council's program would be enhanced if it uses this history as the appropriate context for shaping the final MERR Program. PPC and its members remain committed to mitigating the impacts of the hydropower system on fish and wildlife. And, as the BPA customers funding the Program, will continue to be active participants in the Council process.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Scott Corwin".

Scott Corwin
Executive Director
Public Power Council