

Comment of Tom Iverson, Regional Coordinator, Yakama Nation Fisheries on the 2018 report of 2017 fish and wildlife costs of the Bonneville Power Administration

To whom it may concern,

Thank you for the opportunity to provide comments on the Northwest Power and Conservation Council's (NPCC) DRAFT 2017 BPA F&W Program Costs Report (2018-4). This series of reports was created in response to the 2001 Bonneville Power Administration (BPA) financial crisis in hopes of providing greater transparency to the region for BPA fish and wildlife expenditures. Considering today's state of BPA's financial condition, this report is more important than ever to help the region understand BPA's fish and wildlife costs.

In that context, it would be very helpful to put BPA 2017 fish and wildlife expenditures into an historical perspective. The report currently leads the reader to believe that fish and wildlife costs are on an ever-increasing trajectory (see Figure 12 in your report). In fact, the 2017 fish and wildlife expenditures are at a ten-year low and are currently on a very steep downward trajectory. This should be a concern for the NPCC since BPA efforts are far from achieving the Fish and Wildlife Program's goal to "increase returning salmon and steelhead to an average of five million adults returning above Bonneville Dam by 2025 in a manner that supports tribal and non-tribal harvest." It would be very helpful to the reader for the NPCC to include an historic graph of BPA fish and wildlife expenditures for the past ten years to provide context for BPA's current expenditures. Graphing total BPA F&W Spending over time shows a dramatic downward trajectory, while graphing the BPA Direct Program expenditures over time shows a flat trajectory since 2012. This data is readily available within your annual reports and these graphs would be very helpful in discussing future fish and wildlife costs with the region.

The NPCC report does not help with explaining the complicated interaction between the BPA rate case values assigned to projected fish and wildlife costs and the actual BPA expenditures for fish and wildlife actions. While it is true that during the BPA rate cases for the past ten years, BPA has proposed approximately one-third of their costs be attributed to fish and wildlife for the sake of calculating their power rates (page 5); however, BPA has only expended approximately 20% of the total Power Business Line expenditures for fish and wildlife (as demonstrated in your annual reports). This leads the reader to believe that one-third of BPA expenditures are due to fish and wildlife expenses, which is factually not true. Due to the discrepancy between planned and actual fish and wildlife costs, significant fish and wildlife funding (approximately \$441 million) has apparently been redirected to the BPA general fund between 2008-2017. In 2017, the Direct Fish and Wildlife Program spending was nearly \$20 million less than projected in the BP16 rate case. It would be helpful to the region for the NPCC to provide greater clarity between planned spending identified in the BPA rate cases and actual spending provided in this report.

Thanks again for the opportunity to provide comments. Please contact me if you need further clarification.

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