



Comments On
Seventh Power Plan Issue Paper:
Methodology for Determining Quantifiable Environmental Costs and Benefits
September 2014

Submitted By
Northwest Resource Information Center¹
Ed Chaney, Director
October 31, 2014

The proposed methodology perpetuates the Council's persistent effort over the past 30 years to cover up its egregious betrayal of the public trust that is wreaking ecological, economic and social damage of epic proportions throughout the Northwest region.

It is pointless to offer new comments on a proposed methodology that does not cure the fatal flaws enumerated in NRIC's comments on the precursor Appendix P to the Sixth Power Plan and in NRIC briefs filed in *NRIC v. NW Power and Conservation Council*, 730 F.3d 1008, 1021 (9th Cir. 2013).²

It is pointless to offer new comments on a proposed methodology that is offered out of context of the Council's decades-long unrequited mandate to develop a program to mitigate the devastating effects of the Federal Columbia River Power System on Snake River (and other) salmon.³ The proposed methodology is of a piece with the Council's blatant and thus far successful strategy to subvert the salmon restoration mandate of the Act.

The Council simply refuses to do what the Northwest Power Act requires, i.e., produce a Program that would restore salmon and salmon fisheries decimated by the FCRPS and then use that Program to drive the development of a regional energy plan to assure an adequate, efficient, economical and reliable power supply. Instead the Council conspired with Bonneville Power Administration to drive Snake River salmon onto the List of Endangered Species.

In an effort to cover up subverting the law, the Council detached its salmon non-restoration plan from its Power Plan, and in the proposed methodology proposes to evaluate the environmental costs and benefits only of incremental addition of new resources to its existing regional energy portfolio. By this clumsy slight-of-hand the Council then concludes, ". . . that the region's power supply can remain adequate, reliable, economical and efficient. . ."

¹ NRIC is a scientific, educational organization incorporated in 1976 under section 501 (c)(3) of the Internal Revenue Code specifically to address the then-critical threat to the survival of Snake River salmon posed by four dysfunctional Army Corps of Engineers' dams on the lower Snake River in southeastern Washington.

² The court's decision and all NRIC briefs and the record in this litigation are incorporated into these comments by reference.

³ The devastating effects of the four dysfunction Corps of Engineers' dams on the lower Snake River was the primary impetus for the salmon restoration provisions of the Power Act and the Council's existence.

Nothing could be further from the truth. As noted in NRIC's comments on the Council's draft Columbia River Basin Fish and Wildlife program,⁴ the Council's regional power plan/energy portfolio is based on the virtual destruction of Snake River salmon by the FCRPS and the concomitant epic collateral ecological, economic and social damage.

In short, the Council's plan/portfolio is incontrovertibly not "efficient" or "economical". It is arguably the most *inefficient* and *uneconomical* energy plan/portfolio in the Nation. The proposed methodology is designed to perpetuate and cover up that fact by focusing on incremental additions to that portfolio out of context of the underlying portfolio and out of context of the Council's salmon restoration mandate.

It is nothing less than astounding the Council has managed to fool the Ninth Circuit of Appeals for so many years. One can hope that the Council's luck soon will run out and it finally will harvest the legal, political and public opprobrium it so richly deserves.

...

⁴ Comments on *Public Review Draft Columbia River Basin Fish and Wildlife Program 2013/2014*, Northwest Power and Conservation Council Document 2014-03, submitted by Northwest Resource Information Center, July 25, 2014, incorporated into these comments by reference.