



April 08, 2022

Mr. Guy Norman, Chair
Northwest Power and Conservation Council
Pacific Fishery Management Council
851 SW 6th Avenue, Suite 1100
Portland, Oregon 97204-1384

RE: Comments on NPCC's draft 2021 Columbia River Basin Fish and Wildlife Program Costs Report

Dear Mr. Norman:

Thank you for the opportunity to provide comments on the Northwest Power and Conservation Council's (NPCC) draft 2021 Columbia River Basin Fish and Wildlife Program Costs Report. This is an important report for providing transparency and accountability to both rate payers and taxpayers on fish mitigation spending. We provide the following comments relative to improving clarity within the report.

When discussing the BPA Fish and Wildlife Program funding, reporting estimated costs versus actual expenditures can be confusing. In general, we recommend using the term "cost" or "estimated cost" for projections and budgeting purposes as determined in BPA's Integrated Program Review (IPR) and Rate Case setting process. Those costs are used to establish BPA's wholesale power rate. This report primarily focuses on "expenditures" or "actual costs" by BPA's Fish and Wildlife Division of the Power Business Line (PBL). In several areas the report uses these two terms in a confusing way. For example, we would recommend changing the last line on Page 5 to read "This report only includes actual fish and wildlife ~~cost~~ expenditures, as reported by Bonneville, not the estimated cost in rates."

In this report the NPCC states that 25% of the BPA wholesale power rate in FY2021-FY2022 is for fish and wildlife program spending. This is accurate according to BPA's IPR documents. However, as you report, actual expenditures by BPA PBL on fish and wildlife has frequently been significantly less than 25% (22.5% for 2021, 18.6% average for past ten years). Therefore, while BPA revenues are collected from its customers with the expectation that 25% of the revenues will be required to cover fish and wildlife costs, BPA has generally spent less than that amount on fish and wildlife mitigation actions in recent years. Given the continuing difficulties in achieving NPCC salmonid abundance targets, funds that are collected to meet fish and wildlife obligations should be fully spent on fish and wildlife actions. In the interest of transparency, we suggest that the NPCC include BPA's IPR tables in their report to illustrate the flow of funds intended for fish and wildlife mitigation in comparison to those actually spent on fish and wildlife actions.

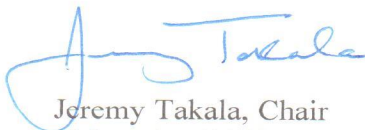
In the last Bonneville rate period (BP-20), nearly \$30M was collected in rates from Bonneville's customers that would have fallen within the 25% of costs that were considered necessary for the Integrated Fish and Wildlife Program but ended up not being spent for that purpose. Rather, we understand that the \$30M was absorbed into Bonneville's general fund and used to meet other Bonneville objectives like building up reserves. Again, we urge that your reporting does not confound forecast "costs" with actual "expenditures" in order to be clear on BPA's actual investment in fish and wildlife mitigation actions.

Finally, we believe it would be very useful to show how BPA funding is leveraged to the benefit of other restoration programs like Oregon Watershed Enhancement Board (OWEB), WA Salmon Recovery Board, etc. These programs have locally developed projects and support of watershed councils, soil and watershed conservation districts, and willing-participant private landowners. BPA's CBFish.org collects cost share information for every contract. This kind of information would show how much BPA funding is a catalyst for extensive cost share opportunities across the basin and would therefore be valuable in review of the fish and wildlife expenditures by Governors' offices.

The annual Columbia River Basin Fish and Wildlife Program costs report to the northwest Governors is a critical and important report for tracking BPA actual expenditures. Our comments are intended to help make it even better.

If you have any questions regarding these comments, please feel free to reach out to Donella Miller, YNF Program Manager at mild@yakamafish-nsn.gov or at 509-865-5121 ext. 6363.

Sincerely



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CC: Aja DeCoteau, Executive Director, Columbia River Inter-Tribal Fisheries Commission
Scott Armentrout, Executive Vice President of Environment, Fish and Wildlife,
Bonneville Power Administration