

June 9, 2023

Richard Spinrad Administrator NOAA 1401 Constitution Avenue NW Room 5128 Washington, D.C. 20230	Janet Coit Assistant Administrator NOAA Fisheries 1315 East-West Highway 14 th Floor Silver Spring, MD 20910	Michael Tehan Assistant Regional Administrator NOAA Fisheries Interior Columbia Basin Office 1201 Northeast Lloyd Portland, OR 97232
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Dear Dr. Spinrad, Ms. Coit, and Mr. Tehan:

The Public Power Council (PPC) represents the interests of non-profit, consumer-owned electric utilities that rely on the Federal Columbia River Power and Transmission System to deliver reliable, economic, and environmentally responsible power to their communities. PPC member utilities repay all the costs the Bonneville Power Administration (BPA) incurs in generating and transmitting the power from the federal hydro system. Indeed, Northwest public power utilities fund approximately 70 percent of BPA’s \$3.9 billion annual revenue requirement through their power and transmission rates and – given their nonprofit nature – have a keen interest in ensuring that BPA complies with its statutory obligation to offer “the lowest possible rates to consumers consistent with sound business principles.”¹

However, the cost of Federal power is not a matter of dry economics for us. PPC members are community-owned utilities delivering an essential human service of electricity to their consumers. In many cases, PPC members serve some of the most economically vulnerable, underserved, and underrepresented communities in the Pacific Northwest. In the last 15 years, BPA’s Tier 1 power rates have already increased 24 percent, requiring PPC members to figure out how to continue to deliver affordable electric power to ratepayers who already struggle with their electric bills. There are no shareholders, investors, or profit margins to absorb increasing power costs – every cost must ultimately be recovered from the ordinary folks in our region, including those who must choose between feeding their children, purchasing life-saving medication, or heating their homes in subzero temperatures. Some see the latter as a luxury they simply cannot afford.

At the same time, PPC and its members have an abiding and vital interest in the recovery of the endangered fish species because many of PPC’s members have declared their commitment to environmentally-friendly and sustainable power generation and usage. This commitment stems in part from the genuine environmental interests and values of the communities they serve, who

¹ 16 U.S.C. § 838(g).

desire environmentally-responsible but also affordable and reliable power. Through BPA's Fish and Wildlife Program, consumer-owned utilities have funded all of BPA's costs for mitigating the impacts of federal hydropower generation on threatened and endangered fish species. Over the last 10 years, the consumer-owned utilities have paid on average \$685 million per year for BPA's program, which constitutes one quarter to one third of their BPA power rates. In total, over the last 10 years, the consumer-owned utilities in the Pacific Northwest have paid more than \$6.8 billion for fish and wildlife mitigation measures.

We know that the National Oceanic and Atmospheric Administration Marine Fisheries Service (NOAA Fisheries) is currently under intense pressure to succumb to single-issue advocates demanding the removal of the Lower Snake River Dams, without either offering credible scientific evidence of the benefits to the endangered species or addressing the massive consequences to the communities and businesses served by public power. The inconvenient truth that these NGOs simply refuse to acknowledge because it counters the narrative they have created is that the survival rates at the Lower Snake River Dams are at their record highs right now. Indeed, as was recently reported, for adult fish swimming upstream, the survival rate is above 90% and 75 of every 100 young chinook and steelhead that head downstream and past the four dams survive.²

We applaud NOAA Fisheries, and specifically Mr. Ritchie Graves, the Columbia Hydropower Branch Chief, for doing what NOAA Fisheries does best – sticking to science and using fact-based data, research, and analysis – to acknowledge that the Lower Snake River Dams are achieving required performance standards. In reference to the tremendous passage rates at the Lower Snake River dams on the Columbia River, Mr. Graves said that: “In a lot of river systems, that would be something they would shoot for.”³ The truth is that the mitigation measures we have invested so heavily in are working and contrary to the claims that the endangered species are at the brink of extinction, we appreciated Mr. Grave's recognition of the real fact that “we haven't lost any populations in 25 to 30 years of listing, either.”⁴

NOAA Fisheries has a long and established history of conducting research and analysis designed to help scientists understand the variety of conditions affecting the nation's oceans and their inhabitants. The NOAA Fisheries scientists have historically been protected from politics allowing them to focus on the facts and pursue endangered species mitigation strategies that were truly scientifically driven. That is why we were so surprised when on July 11, 2022, NOAA Fisheries released a “Regional Fishery Co-manager Review Draft” of a report entitled “Rebuilding Interior Columbia Basin Salmon and Steelhead.” That report was out of character for NOAA Fisheries and not consistent with the agency's historical practices. It was unusual in its process, having been prepared in consultation with fishery managers for the Nez Perce tribe

² Matthew Weaver, *Amid a Battle Over Snake River Dams, a Look at How the Salmon Are Doing*, CAPITAL PRESS, May 18, 2023, retrieved from https://www.capitalpress.com/ag_sectors/grains/amid-a-battle-over-snake-river-dams-a-look-at-how-the-salmon-are-doing/article_c76c740a-dadd-11ed-ad18-9fb96a214c52.html.

³ *Id.*

⁴ *Id.*

and the State of Oregon, and unattributed in terms of authorship within NOAA. In response to that report, PPC sent NOAA Fisheries a letter raising science-based concerns and laying the report's shortcomings. That letter is attached. To this day, PPC has not received a response from NOAA Fisheries.

We urge you to resist the undue political pressure to endorse actions not supported by the facts and the science and to protect NOAA Fisheries and its scientists from unprecedented and increasing attacks by environmental extremists to censor their official, science-based findings.

Regards,



Bear Prairie,
General Manager
Idaho Falls Power
Chair, PPC Executive Committee



Joe Morgan,
General Manager
Modern Electric Water Company
Vice Chair, PPC Fish & Wildlife Committee



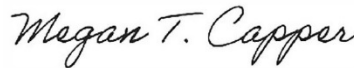
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