

September 4th, 2013

Lorri Bodi
Vice President, Fish & Wildlife
Bonneville Power Administration
905 NE 11th Ave.
Portland, OR 97232

RE: Reduction in Funding for Coded-Wire Tag Program

Dear Ms. Bodi,

Northwest Requirements Utilities (NRU) is writing to express our support for BPA's potential reduction in funding for the coded-wire tag (CWT) program. NRU is a non-profit trade association of 52 public power systems that rely upon BPA as their primary or exclusive supplier of wholesale electric energy. These utilities account for nearly 25% of BPA's wholesale public power sales in the Northwest. Northwest Requirements Utilities has been very active in all forums to support BPA in fulfilling their environmental stewardship responsibilities, particularly regarding fish and wildlife issues associated with FCRPS operations.

Despite two years of research and deliberation in the Fish Tagging Forum, the Northwest Power and Conservation Council voted to maintain status quo funding for the CWT program at \$7.5 million.¹ NRU members support BPA's assessment that the majority of funding for CWT falls outside the nexus of hydro operations.

NRU members find that catch sampling for harvest management is utilizing BPA funding in lieu of fishery managers' responsibility. Catch sampling and associated analysis is used for harvest management and is the responsibility of the state fishery managers both by statute and international treaty. We note that the Northwest Power Act explicitly prohibits funding that is in lieu of other expenditures authorized or required from other entities under other agreements or provisions of law. NRU members support BPA ceasing funding CTW activities associated with catch sampling for harvest management.

NRU members also support BPA ending funding for CTW activities at Mitchell Act Hatcheries. BPA funding for CTW activities at Mitchell Act Hatcheries represents funding by BPA that is in lieu of NOAA's responsibility. NRU members note that the Northwest Power Act explicitly prohibits funding that is in lieu of other expenditures authorized or required from other entities under other agreements or provisions of law, and that Congress has designated funding responsibility for Mitchell Act hatcheries to National Oceanic and Atmospheric Administration (NOAA).

¹ Grover, T. (2013). Fish Tagging Forum Process and Recommendations. *Northwest Power and Conservation Council August Meeting*. Portland, OR.

NRU members support continued Action Agency funding of CWT in the limited instances when utilized at FCRPS mitigation hatcheries to perform analysis associated with hatchery management and in studies to evaluate the percentage and impact of FCRPS hatchery origin fish on the spawning grounds. However, these instances represent only a fraction of BPA's current CWT funding.

Thank you for the opportunity to comment.

Best Regards,



John Saven, Chief Executive Officer

CC: Elliot Mainzer, Acting Administrator, Bonneville Power Administration
Terry Flores, Executive Director, Northwest RiverPartners
Scott Corwin, Executive Director, Public Power Council
Steve Crow, Executive Director, Northwest Power and Conservation Council