

August 14, 2013

CRT Review (DKE)
P.O. Box 14428
Portland, Oregon 97293

U.S. Entity Coordinators, Columbia River Treaty

Mr. Stephen R. Oliver
Bonneville Power Administration

Mr. David Ponganis
U.S. Army Corps of Engineers

Dear Sirs,

Inland Power and Light Company is pleased to be provided the opportunity to comment on your June 27th "Columbia River Treaty Review Working Draft of a Regional Recommendation." Inland Power is an electric cooperative serving some 39,000 members in 13 counties in eastern Washington and northern Idaho. Our service area is largely rural and either includes or borders on areas where major components of the Federal Columbia River Power System (FCRPS) are located.

We understand and appreciate that the Columbia River Treaty involves many complexities and is of interest to many parties both here in the Pacific Northwest and in Canada. Your efforts to date have undoubtedly involved many challenges and we acknowledge the difficulties involved in preparing the working draft recommendation given the process used thus far.

Unfortunately, we must conclude that the working draft recommendation is seriously flawed in many basic respects and should not serve as a basis for further efforts and negotiations regarding a revised Columbia River Treaty. We support the comments and conclusions submitted by the Northwest Requirements Utilities (NRU), Northwest Irrigation Utilities (NIU), Public Power Council (PPC) and the Columbia River Treaty Power Group.

From Inland's perspective, the working draft recommendation has lost its focus on the key issues of power generation benefits and related compensation and flood control. The working draft recommendation has instead largely become an effort to supersede the well-established and scientifically based Biological Opinion (BiOp) for addressing anadromous fish issues. The

vague, ill defined, seemingly open ended and/or yet to be defined nature of many portions of the working draft recommendation, particularly the ecosystem-based function section, as well as items noted in the cover letter, are simply “troubling.”

Inland Power is supportive of sound, scientifically based BiOp efforts to mitigate for the impacts of the FCRPS. Between 1978 and 2012, Inland members have paid close to \$200 million of the total \$13 billion that has been invested in federal fish and wildlife measures. A revised Columbia River Treaty is not the mechanism to make wholesale and unsupported changes to the approaches incorporated in the BiOp and Tribal Fish Accords.

While the current Columbia River Treaty is very unbalanced in terms of benefits derived between U.S. and Canadian interests, it is Inland’s view that it would be inappropriate to proceed with the negotiation of a revised treaty using what we see as the seriously flawed current working draft recommendation. It would be much better to make fundamental changes to both the process and substance of much the working draft recommendation before proceeding with any actual treaty negotiations.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Chad V. Jensen". The signature is fluid and cursive, with the first name "Chad" and last name "Jensen" clearly legible, and a middle initial "V." in between.

Chad Jensen
Chief Executive Officer
Inland Power and Light Company

Cc: Senator Patty Murray
Senator Maria Cantwell
Congresswoman Cathy McMorris Rodgers
Governor Jay Inslee
Northwest Power Council Member Tom Karier