

Ravalli Electric Co-op

1051 Eastside Highway
PO Box 190
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October 23, 2013

CRT Review (DKE)
Stephen Oliver, Bonneville Power Administration
David Ponganis, U.S. Army Corps of Engineers, Northwest Division
PO Box 14428
Portland, OR 97293

Re: Columbia River Treaty (Submitted electronically to treatyreview@bpa.gov)

Dear Mr. Oliver and Mr. Poganis,

Ravalli Electric Co-op is pleased to submit comments on the September 20, 2013 Draft Regional Recommendation of the Columbia River Treaty Review. We are a small western Montana cooperative serving 10,000 member/owners. We have been an active purchaser of power from BPA since 1950 and were the first cooperative in Montana to do so. While the latest draft has some improvements over the original of June 27, 2013, it is still lacking in fundamental direction for a Regional Plan.

Rebalancing the benefits of the system between Canada and the U.S. should be the primary goal. The current Treaty is standard model for transboundary water treaties. Unfortunately, the sharing of benefits has been grossly unfair over time, something the original drafters and signatories hadn't contemplated. The attempt to add new purposes like "ecosystem functions" while ignoring the billions spent by the regions ratepayers over the past 50 years for environmental stewardship is very concerning. Ecosystem is covered by other Federal, State and local laws and should not be a part of this international treaty.

We support the efforts to add flexibility into the agreement. Bonneville has historically forecast snowpack and water runoff conditions multiple times each year. I assume that is because a single forecast each year would be grossly out of line by years end. That should make it abundantly clear that today's projections planned for 50 years into the future would also be out of line. Efforts to enhance cross boundary planning and operational flexibility in order to maximize the benefits of the CRS are a benefit to everyone. This should also make sure that future benefits are shared equally. We, however, do not support adding wastebasket phrases like "climate change" and "ecosystem" into the mix. They are way too vague and allow a wide range of interpretation without any direct reason or plan. The phrases are a hedge against making a firm statement and having to live up to those statements.

Finally, we support the Power groups work on reestablishing a fair and equitable Treaty. Thank you for your consideration of our comments.

Sincerely,



Richard J. Brown
General Manager

cc: Trustees
Joe Lukas, WMG&T

"The Power of Human Connections"

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