

August 1, 2001

Mark Walker
Director of Public Affairs
Northwest Power Planning Council
851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204

RE: Comments on recommendations for a plan for the mainstem of the Columbia and Snake rivers as an amendment to the Northwest Power Planning Council's Columbia River Basin Fish and Wildlife Program

Dear Mr. Walker:

Our comments on several of the recommendations submitted to the Northwest Power Planning Council (Council) for a plan for the mainstem of the Columbia and Snake River are based on the four points the Council asked to be considered which are: 1. consistency with the basinwide provision in the Council's program, especially the role of the mainstem plan in a multi-species, habitat-based program; 2. power supply considerations; 3. relationship of the mainstem plan of the fish and wildlife program to the recently released biological opinions on hydropower operations; 4. long-term objectives and strategies for the mainstem.

Flow Augmentation

Flow augmentation from the Upper Snake River has been the most controversial issue for Idaho in the regional debate over how to operate the Federal Columbia River Power System. The cost of flow augmentation to Idaho and the region without knowing the biological benefits to fish is at the heart of the issue. We support the recommendations that propose the biological benefits to fish of various flow and spill regimes.

One of the Hydrosystem Passage and Operations Strategies in the Council's Fish and Wildlife Program is; "Assure that flow and spill operation are optimized to produce the greatest benefits with the least adverse effects on resident fish while assuring an adequate, efficient, economical, and reliable power supply." A measure called for under this strategy is; **"Bonneville, in consultation with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service, shall prepare an annual report based on scientific research for review by the Independent Scientific Advisory Board that**

documents the flow augmentation actions taken, the benefits of flow augmentation for fish survival, and the precise attributes of flow that may make it beneficial.” We encourage the Council to expand upon this measure in the plan for the mainstem and that the Council request this action be incorporated into the federal agencies Implementation Plan.

We oppose recommendations that propose additional flow augmentation from the Upper Snake River, and drafting Dworshak 20 ft from elevation 1520 to 1500 ft in August.

Ocean Research

We support BPA's recommendation to support the ongoing federal efforts and plans to ascertain the affects of the marine environment on salmon survival. We also agree with BPA's statement in their recommendations that the importance in understanding the ocean's effect on salmon adult returns is that ocean conditions affecting mortality may overwhelm the effects of any action taken in the fresh water portion of the salmon's life cycle, thus resulting in misinterpretation of the effects of management actions taken in the mainstem or tributaries.

Predator Control

We strongly support the recommendations that propose the need for more aggressive action to reduce predation of salmonid spring and summer migrants in the estuary.

Turbine Passage

We support recommendations that propose alternative turbine designs such as minimum gap runners be further investigated and installed to reduce juvenile mortality. One of these recommendations propose that the plan for the mainstem require the federal operators to incorporate all state-of-the-art turbine design technology to improve fish survival during turbine rehabilitation programs. Another recommendation proposes that because dam-related projects are likely to provide for safer passage through turbines will be regarded as a high priority since fish will continue to pass through turbines regardless of the effectiveness of non-turbine passage alternatives.

Operating Turbines at 1% Efficiency

Two of the recommendations propose operating turbines at 1% of peak efficiency to improve survival. This criteria is based on a paper by Milo Bell, 1981. Another recommendation proposes that some research show increased fish survival at increased flow rates beyond their best efficiency points thereby increasing available generation capacity while also improving fish passage survival. We propose that the Council call for the review of the science and new research, which is available within a short time frame on this issue in the plan for the mainstem.

Dam Breaching

We oppose all recommendations that propose breaching mainstem dams because current science does not support dam breaching as an effective fish recovery measure. We believe the region's efforts should remain focused on immediate scientifically supported actions benefiting fish.

Interstate Flow Agreements

BPA recommends; “ the Council facilitate an agreement among the four states to ensure state law recognizes instream water rights for aquatic habitat as a beneficial use. In addition, when existing water rights are converted to instream use, state water agencies should grant the new instream water right the same priority date of the original water right”. We oppose this recommendation based on the specific Council Fish and Wildlife Program language regarding water rights which is: “As provided by the Northwest Power Act, nothing in this program shall affect the rights or jurisdictions of the United States, the states, Indian tribes, or other entities over waters of any river or stream or over any groundwater resources or otherwise be construed to alter or establish the respective rights of States, the United States, Indian Tribes, or any person with respect to any water or water-related right.”

Performance Standards and Biological Objectives

We support BPA’s recommendation on performance standards and biological objectives for the NMFS Biological Opinion and Implementation Plan. Eventhough it is not specifically stated as such, we assume that a method of accounting will be developed to document and credit all actions taken at the local, state and federal level that effectively improve conditions for fish and wildlife in the Columbia Basin in compliance with the NMFS Biological Opinion and the Action Agency’s Implementation Plan.

We look forward to reviewing and commenting on the “draft” plan for the mainstem.

Sincerely,

A handwritten signature in black ink, appearing to read "Dirk Kempthorne", with a long horizontal flourish extending to the right.

DIRK KEMPTHORNE
Governor

DK:jlc