

BPA Public Involvement

From: Andy.Stuth@alcoa.com
Sent: Tuesday, April 06, 2004 09:21
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Andy Stuth

Andy.Stuth@alcoa.com
(360)384-7301

Ferndale Wa 98248

Dear BPA and the Corps of Engineers, I work in an industry that depends on economical power from federal hydroelectric projects in the Northwest. Recent BPA power rate increases have had tremendous impacts, and have put the future of my job in doubt. It is vital that we reverse the upward trend on power costs. I support your common-sense proposal for a more efficient summer spill program. Protecting people as well as salmon is important, and I urge you to proceed. Thank you for the opportunity to comment, Andy Stuth Enviromental, Health and Safety Specialist Alcoa Intalco Works P.O. Box 937 Ferndale, WA 98248 Phone: (360) 384-7301 Andy.Stuth@alcoa.com

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Wednesday, April 07, 2004 13:56
To: comment@bpa.gov
Subject: Comment on BPA's Strategic Direction

Comment on **BPA's Strategic Direction**

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No E-mail Address Submitted

BPA's proposal to reduce summer spills will help the economic recovery of the Pacific Northwest; our region must be afforded the lowest possible electricity costs to stimulate family wage jobs. BPA must do everything in its power to reduce costs and generate affordable power to its stakeholders. With reducing the summer spills, BPA can generate savings of up to 45 million dollars at a time when BPA rates are the highest in the U.S. and the world. BPA has an opportunity to do the right thing for its customers, now is the time to set up to the plate to reduce, if not eliminate summer spills. We must make economic development a priority, BPA must use everything in this arsenal to reduce cost and save family wage jobs. My job and my co-workers at Alcoa/Intalco are dependent on affordable electricity, again, do the right thing for our region do not have a summer spill, save a job and a family.

BPA Public Involvement

From: bkopacz@midstateelectric.coop
Sent: Tuesday, April 06, 2004 14:15
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Bill Kopacz

Midstate Electric cooperative Inc.

bkopacz@midstateelectric.coop

541-536-2126

51340 N. Highway 97

LaPine Or 97739

4/6/2004 RE: Summary Spill Dear BPA: The three year Summer Spill proposal will save about \$40 million per year, and the savings from 2004 and 2005 should be sufficient to reduce power rates in FY 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook, the spill adjustment only impacts a range of 2 to 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish anticipated to be lost from spill reductions, for a net impact of 1- 10 ESA fish. This is in the context of a run of Wild Snake River Fall Chinook returning adults that is reported as 2,420. For non ESA listed Fall Chinook the impact for spill adjustments is 12,600, but the mitigation measures will produce 88,662 returning adults. These runs exceed 384,000 fish and they are harvested in river at over 32%, about 123,000 fish. Reducing the summer spill program is the only common sense approach for BPA, the Corps and NOAA Fisheries. All of us in the Pacific Northwest need to keep our cost of operation low so we can stimulate economic recovery. Thanks.

BPA Public Involvement

From: Bobg@guidinger.homedns.org
Sent: Wednesday, April 07, 2004 9:51 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Bob Guidinger

Bobg@guidinger.homedns.org
541-298-2730
305 E 12th St.
The Dalles OR 97058

I would like to see the summer spill for salmon reduced or removed. I believe it does not improve the passage of fish at the dams during this time period.

BPA Public Involvement

From: premierjewel@msn.com
Sent: Wednesday, April 07, 2004 8:16 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Brenda Webb

premierjewel@msn.com
541-567-1768
2050 NW Geer Rd
Hermiston OR 97838

The proposal of reducing spill and providing offsets is going in the right direction for achieving cost-effective salmon recovery. The two initial offsets are a good start and go far in meeting the biological criteria. Any additional offsets must be chosen based on cost-effectiveness and biological benefits. specific offsets could be: further enhancing predator control programs, adding avian predation control, consider reducing non-tribal commercial harvest if necessary, and increasing hatchery production at specific hatcheries that are in the geographic areas of concern.

BPA Public Involvement

From: mccawbc@columbiainet.com
Sent: Wednesday, April 07, 2004 8:43 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Bruce E. McCaw
Director Columbia REA
mccawbc@columbiainet.com
(509) 525-0509
4706 Frog Hollow Road
Touchet WA 99360

I support the proposed summer spill program. A three year test to evaluate the effects of spill on young salmon seems reasonable. The economic benefits of reduced BPA rates should help the region retain industry, help create new jobs and reduce the historic high number of customer disconnects due to inability to pay. The proposals to mitigate the impact of reduced spill seem reasonable. This test is long overdue. Please implement it as planned. Cordially, Bruce E. McCaw



April 5, 2004

Stephen J. Wright
Administrator
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Bob Lohn
NOAA Fisheries
Office of Regional Director
7600 Sandpoint Way NE
Seattle, WA 98115-0070

Brigadier General William T. Grisoli
Commander and Division Engineer
U.S. Army Corps of Engineers
Northwestern Division
P.O. Box 2870
Portland, OR 97208-2870

Gentlemen,

The Public Power Council is a not-for-profit association representing 114 consumer-owned utilities in the Pacific Northwest. One of our missions is to assure that the dollars collected from our members' ratepayers are used in the most economic manner. We are keenly aware of the effects of the federal hydrosystem on fish and wildlife resources in the Columbia River basin. We appreciate the efforts on behalf of the federal agencies to consider more efficient and cost-effective methods to assure the safe migration of juvenile salmonids from the Snake and Columbia Rivers. We offer these comments on the issue of the summer spill program reduction as proposed by Bonneville Power Administration (BPA) and the U.S. Army Corps of Engineers (Corps) dated March 30, 2004 (March 30 proposal).

The NOAA-Fisheries (NOAA-F) Biological Opinion (BiOp) allows flexibility in actions to meet performance standards for juvenile survival during outmigration through the Federal Columbia River Power System.

The flexibility provided by NOAA-F in the 2000 BiOp for the federal hydrosystem is particularly relevant to the use of spill to pass the only Endangered Species Act (ESA) listed fish – *i.e.*, Snake River fall chinook – that are in the river during the summer months of July and August. The latest scientific information shows that there are extremely small biological benefits for the Snake River fall chinook from summer spill.

The current strategy in the BiOp is to achieve specified biological performance standards for fish listed for protection under the ESA. The BiOp contains 199 actions in what NOAA-F calls the “Reasonable and Prudent Alternative” (RPA). In proposing these actions, however, NOAA-F is clear that significant uncertainties and gaps in our knowledge exist that require flexible implementation. In this regard, NOAA-F says

The results from these studies and monitoring should provide better understanding about the status of the ESU’s, about which measures work, and about which measures do not work . . . Monitoring and evaluation may lead to revisions in measures the Action Agencies undertake to meet performance standards, or in the performance standards themselves . . .

NOAA-F recognized that it is impossible to prescribe specific actions with the large gaps in our scientific knowledge of what factors actually affect salmon survivals. The flexibility provided in the BiOp for the Action Agencies to adapt actions based on the best available scientific information allows the region to pursue those actions that are both biologically effective and cost-efficient. Section 9.1.6 of the BiOp provides as follows:

An annual, multiyear planning process to refine, implement, evaluate, and adjust ongoing efforts is critical to achieving the FCRPS hydro and offsite performance standards within the time frame covered by this biological opinion.

Specifically with respect to the hydro system, Section 9.1.2: Hydro Actions, provides that

NMFS may deem other combinations of measures sufficient to meet the performance standards and avoid jeopardy.

In summary, the federal agencies should work to assure that ratepayer dollars are put to the most effective and efficient use. The March 30 proposal to reduce summer spill utilizes the flexibility available to the Corps and BPA. Yet more can be done to achieve a balance between economic issues and natural resource protection.

Senior level policy makers must strike a balance between economic issues and natural resource protection.

The decision to implement alternatives to summer spill is a policy decision. Technical staffs from throughout the region have, for several months, thoroughly vetted the risks and benefits of a reduction in summer spill to Columbia River Basin salmon and steelhead stocks. The federal executives are faced with two equal alternatives. It is now

their responsibility to balance the policies of their respective agency as to economic issues and natural resource protection.

Non-ESA listed Snake River fall chinook are adequately mitigated under the offset measures presented in the March 30 proposal.

In the most conservative case, the proposed reduction in summer spill as described in the March 30 proposal provides a benefit of about 12,600 non-ESA listed fall chinook salmon. The offset measures provide an estimated benefit of 88,662 adult fall chinook salmon returning to the Columbia River Basin. The offset measures are estimated to provide a seven-fold improvement to that provided by summer spill, and at a significantly lower cost to the ratepayer.

The proposed spill reduction will provide an economic benefit to the region's ratepayers of about \$35 to 40 million over the next three years. An additional 50,000 to 60,000 adult fall chinook returning to the Columbia River Basin will provide a significant economic benefit to both non-treaty and treaty fishers. We are encouraged by the efforts of BPA and the Corps to develop a proposal that works toward balancing economic issues and natural resource protection.

The offset measures described in the March 30 proposal can adequately offset any adverse effects to ESA listed Snake River Fall chinook.

The most conservative estimated benefit to ESA listed Snake River Fall chinook due to the reduced summer spill option described in the March 30 proposal is 500 juveniles or 20 adult fish. The estimated benefit of the proposed offset measures is 11 adult fish. The difference in survival of ESA listed Snake River fall chinook is nine adult fish or approximately 200 juveniles. Apparently this number was derived from SIMPAS model runs comparing various spill reduction regimes. The use of SIMPAS to provide estimates of effects or benefits at this small increment range is unsupportable.

The input parameters to SIMPAS, composed primarily of survival by route of passage and pool mortality, all have an associated range of uncertainty. The Corps and BPA declare, several times in the March 30 proposal, that they used the most conservative inputs to the SIMPAS run to derive this number. A slight improvement in any of the offset measures could produce nine adult fish, thereby more than adequately offsetting any adverse effect due to the proposed summer spill reduction. But there are several offset measures presented in the March 30 proposal will more than adequately address the minimal adverse effects to ESA listed Snake River fall chinook salmon. The offset measures described in the March 30 proposal provide flexibility to mitigate adequately for specific stocks of non-ESA listed salmon and steelhead.

There are a variety of offset measures that provide a significant benefit both to salmon and steelhead in the Columbia and Snake Rivers, and to utility ratepayers and treaty and non-treaty fishers.

When compelled, technical staffs with the various fish management entities were able to identify myriad offset measures that partially mitigate for a reduction in summer spill. A subset of these options is provided for comment in the March 30 proposal. There are several that will provide a significant economic benefit while increasing the populations of both salmon and steelhead on the Columbia and Snake Rivers.

Many who criticize the March 30 proposal gain an economic benefit either directly from arguing the issues, or indirectly by harvesting fish or managing the salmon and steelhead resources. The burden of paying this benefit is on the ratepayers. Our utility members gain no economic benefit from reducing the survival of salmon and steelhead. Our desire is to provide an equal or greater benefit to fish in an efficient and cost effective manner.

A less than 1% reduction of Lower Columbia River non-tribal fall chinook harvest will adequately offset any adverse effect of the summer spill reduction on ESA-listed Snake River fall chinook.

The non-treaty commercial fishery in the Lower Columbia River provides a minimal economic benefit to the region when compared to the loss of generation through summer spill, and exerts a significant impact to ESA listed salmon and steelhead. A less than 1% reduction in lower river non-tribal commercial harvest would more than adequately mitigate adverse effects to ESA listed Snake River fall chinook salmon. According to non-treaty commercial harvest data from 2003, a 2% total reduction in lower river non-tribal commercial harvest would result in an additional 160 ESA listed Snake River fall chinook salmon escaping upriver.

The region will gain a significant recreational and economic benefit by reducing or eliminating the Lower Columbia River non-treaty commercial fishery. A portion of the fish and concurrent ESA impacts reassigned to the sport fishery would provide approximately double the sport fishing seasons and thereby great economic benefit to fishing communities throughout the region. NOAA-F should reduce or eliminate the impact to ESA listed salmon and steelhead stocks as a result of the Lower Columbia River non-treaty commercial fishery.

Estimates of the benefit of the Northern Pikeminnow Management Program (NPMP) are inordinately conservative.

As described in the March 30 proposal, the benefits of the NPMP were very conservatively estimated. A more aggressive and focused removal of Northern

pikeminnow can provide a significant survival improvement to fall chinook salmon that will more than adequately offset any adverse effects of the proposed reduction in summer spill.

The Corps and BPA estimate that implementing a more aggressive NPMP will result in a catch on an additional 10,000 fish through the existing bounty program, and an additional 5,000 through site-specific removal around dams. The 2001 “heavy-up” of the NPMP resulted in an additional harvest of 40,000 pikeminnow. The estimated increase in harvest through the bounty program is extremely conservative, at 25% of that actually observed in 2001. It is very likely that an increase in the NPMP bounty will provide a more significant benefit to fall chinook.

Using a still very conservative estimate of harvest rate of 50% of the 2001 harvest, or an additional 20,000 pikeminnow, the benefit to ESA listed Snake River fall chinook is about 24 adult fish or 590 juveniles. This more than adequately offsets any adverse effects due to the reduction in summer spill. We urge the Corps and BPA to revisit their very conservative estimated benefit of the NPMP.

Increased management of other predatory fish species will provide a significant benefit to juvenile salmon and steelhead outmigrating from the Columbia and Snake Rivers.

Unfortunately, the Corps and BPA did not include increased management of smallmouth bass, walleye or channel catfish in their offset measures. Significant populations of these predatory fish are found throughout the basin. A minimal effort to manage these species within the boat restricted zones adjacent to the dams should provide a measurable survival benefit to outmigrating juvenile salmonids.

While managing Northern pikeminnow populations adjacent to dams, staff can also remove other predatory species. If unavailable, an acceptable estimate of benefit to juvenile salmonids could be made through concurrent studies or through those conducted at a later date. We urge BPA and the Corps to investigate reservoir operations that may be useful in reducing the populations of predatory fish species.

The Corps and BPA should consider the fact that these are species are not native to the Columbia River Basin. Moreover, these populations exert a significant mortality on both ESA listed and non-listed salmon and steelhead stocks. While difficult to implement, increased management should be considered as an efficient and cost effective option to summer spill.

Additional or improved artificial production may be a feasible offset measure for summer spill.

Increased hatchery production may provide benefits to specific stocks not completely mitigated by the proposed offset measures. The actual number of juvenile fish required to offset fully the proposed summer spill reduction is so small that these fish could be produced in existing facilities. There are, however, several issues to consider with this option. The hatchery program should not conflict with NOAA-F ESA policies or with state wild fish policies. Any additional fish produced through these programs should not be harvested in commercial fisheries that have an impact on ESA listed stocks.

Removable Spillway Weir (RSW) technology has promise for significantly benefiting both the salmon and steelhead and the ratepayers.

The RSW at Lower Granite Dam has demonstrated a higher fish passage efficiency, higher survival than spillway passage and at a more economic river operation the spillway passage. Preliminary tests on the Bonneville Powerhouse 2 corner collector are showing similar benefits. While installation of more RSWs do not meet the specific criteria required in the summer spill reduction proposal, we urge the Corps and BPA to evaluate, and, where feasible, implement similar surface bypass technologies.

There are non-economic benefits to the region to be gained by the proposed reduction in summer spill.

Reduction of summer spill will lead to a significant reduction in greenhouse gas emissions. The current summer spill reduction represents an equivalent of approximately 1.4 million MWh. Replacing hydro generation with that from fossil fuel power plants will result in an estimated 1.4 million additional tons of carbon dioxide. This is equivalent to the carbon dioxide produced from burning nearly 4000 railroad car loads of coal. Similarly, replacing 1.4 million MWh of hydro generation with fossil fuel-derived generation would increase the emissions of SO₂ by 2600 tons and NO_x emissions by 2700 tons. These numbers double if the hydro generation would displace primarily coal generation.

This reduction in carbon dioxide emissions would result in a reduction in both greenhouse gas emissions and acid deposition from SO₂ and NO_x emissions. Alternate methods are available for offsetting the effect of reduced summer spill on fish – thus this seems a perfect opportunity to help the region economically, minimize net impact to fish, and have significant positive impacts on the environment.

We support implementation of the Libby-Hungry Horse reservoir operation.

Modifying the summer draft of the Libby-Hungry Horse reservoirs should provide a benefit to recreation and resident fish in the upper Columbia River Basin. The actual volume of water provided to the lower river is immeasurable (very small). The Corps

and BPA should work with fish management agencies to draft these reservoirs in a manner that provides the greatest benefit to all interests.

Summary

- The BiOp for the federal hydrosystem allows the Action Agencies the flexibility to meet juvenile survival performance standards in the most efficient and cost effective manner.
- It is the responsibility of senior policy staff from the federal agencies to balance natural resource protection with economic impacts of the summer spill program.
- The offset measures presented in the March 30 proposal were developed from very conservative estimates of their benefits. Increasing the scope of these offsets, especially management of predatory species, will provide a benefit to both ESA listed and to non-listed salmon and steelhead stocks in the Columbia and Snake Rivers at a significant savings to the region.
- The offset measures provided in the March 30 proposal provide a seven-fold benefit to salmon and steelhead as compared with that provided by the reduced summer spill. The survival gap for ESA-listed Snake River fall chinook is nine fish, which is within an error estimate of the SIMPAS model.
- When compelled, technical staff from natural resource agencies can identify myriad offset measures that provide a more efficient and cost effective means to mitigate adverse effects to salmon and steelhead stocks.
- A less than 1% reduction of Lower Columbia River non-tribal fall chinook harvest will adequately offset any adverse effect of the summer spill reduction on ESA-listed Snake River fall chinook.
- The estimated benefit of the NPMP as estimated by the Corps and BPA is conservatively low. Increasing the harvest rate to 50 % of that observed in 2001 instead of 25% will completely mitigate for adverse effects to ESA listed Snake River fall chinook.
- Increased management of other predatory fish species will provide a significant benefit to juvenile salmon and steelhead outmigrating from the Columbia and Snake Rivers.

- Additional or improved artificial production may be a feasible offset measure for summer spill. Fish managers should ensure that additional artificial production does not conflict with salmon recovery efforts.
- RSW technology has significant promise for significantly benefiting both the salmon and steelhead and the ratepayers.
- There are non-economic benefits to the region gained by the proposed reduction in summer spill. Implementing a reduction in spill will reduce the need to replace generation lost to that operation, thereby reducing the emission of greenhouse gasses.
- Implementation of the modified Libby-Hungry Horse reservoir operation should provide a benefit to recreation and resident fish in the upper basin.

We appreciate the opportunity to comment. We look forward to the opportunity to explore with you new avenues to balance the economic realities of the region with effective natural resource protection.

Sincerely,

A handwritten signature in black ink that reads "C. Clark Leone". The signature is written in a cursive style with a long horizontal flourish extending to the right.

C. Clark Leone
Manager

BPA Public Involvement

From: gamalil1@yahoo.com
Sent: Wednesday, April 07, 2004 9:43 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

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Candy Welsh
WREC
gamalil1@yahoo.com
775-752-3548
580 5th Street
Wells NV 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as a member of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Tuesday, April 06, 2004 15:30
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://webit2/corporate/kc/home/comment.cfm>

Carol Lynde
Harney Electric Cooperative, Inc.
No E-mail Address Submitted

1326 Hines Blvd
Burns OR 97720

I am in FAVOR of curtailing the summer spill. The savings from this curtailment far outweighs the benefits to the few fish it impacts.

BPA Public Involvement

From: c.carter@dhittle.com
Sent: Wednesday, April 07, 2004 8:46 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Christina Carter
Electrical Engineering Consultant
c.carter@dhittle.com
509-627-4719
815 Columbia Park Trail
Richland WA 99352

The summer spill reduction should proceed as proposed. The projected change in the fish runs is minimal. Meanwhile the increased power production is large. This will enable BPA to reduce wholesale power rates. BPA has been looking for more ways to cut costs in recent years. This proposal is one way where resources can be better utilized. BPA has an obligation to balance its resources in a manner which benefits the region as a whole. The spill reduction proposal does that.

BPA Public Involvement

From: cfitch@wrec2.com
Sent: Wednesday, April 07, 2004 8:19 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Clay R. Fitch
Wells Rural Electric Company
cfitch@wrec2.com

PO Box 365
Wells NV 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program As the CEO of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: dsabala@dougselectric.com
Sent: Wednesday, April 07, 2004 10:20 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Dave Sabala
Douglas Electric Cooperative
dsabala@dougselectric.com
541-673-6616
PO Box 1327
Roseburg OR 97470

Summer Spill Proposal Dear Sirs: I am recommending that summer spill should be eliminated entirely. Alternatives should include additional controls for predation in the following areas: 1) Caspian Tern nesting discouragement program 2) Small Mouth Bass bounty control program 3) Sea Lion removal and transport to other distant areas program Best Regards, Dave

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Wednesday, April 07, 2004 09:34
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://webit2/corporate/kc/home/comment.cfm>

David Lopez

No E-mail Address Submitted

406-541-4433

1700 W Broadway

Missoula MT 59808

I fully support the proposed Summer Spill. I believe it is going in the direction that will enhance cost-effective salmon recovery. I think the offsets appear to be a positive way to begin to meet the biological criteria. The offset(s) that make the most sense to me are increasing hatchery production at specific hatcheries that are in the geographic areas of concern and further enhancing predator control programs.

Thank You

BPA Public Involvement

From: david.boyer@alcoa.com
Sent: Tuesday, April 06, 2004 11:18
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

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David S. Boyer
Alcoa Intalco Works
david.boyer@alcoa.com
360-384-7439
4050 Mountainview Road
Ferndale WA 98248-0937

Dear BPA and the Corps of Engineers, I work in the Aluminum Industry, an industry that depends very heavily on economical power from federal hydroelectric projects. Recent BPA power rate increases have had tremendous impacts, and have put the future of my job in doubt. Alcoa Intalco is one of the last few operating Aluminum Smelters in the region and the only one operating at any significant production capacity. My family and I relocated to this area just two years ago and may have to leave Washington State if my job is eliminated due to closure of this facility. AS a private citizen I am concerned about ever increasing power rates and the impact it has not only on my family but others, some less fortunate than us. Reading articles about Senior Citizens and low income families having their power shut off due to their inability to pay or making choices between, food, medical care and power bills is extremely troubling. It is vital to families, workers and our shared economy that we reverse the upward trend on power costs. I support your common-sense proposal for a more efficient summer spill program. Protecting people is at least as important as protecting salmon, and I urge you to proceed in reducing and eventually eliminating the spill. Thank you for the opportunity to comment, David S. Boyer and Family

BPA Public Involvement

From: dnaab@canbyutility.org
Sent: Wednesday, April 07, 2004 11:34 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Debbie Naab
Canby Utility Board
dnaab@canbyutility.org
503-266-1156
154 NW 1st Avenue
Canby OR 97013

Canby Utility appreciates the opportunity to comment on your March 30 Summer Spill Proposal. Canby Utility believes your March 30 proposal to reduce summer spill and provide alternative offsets is a move in the right direction to get us to a cost-effective salmon recovery. We have long been concerned about the costs to our consumers associated with summer spill. Canby Utility urges you to implement your March 30 Preliminary Proposal.

BPA Public Involvement

From: dwight@nwasco.com
Sent: Wednesday, April 07, 2004 8:48 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Dwight Langer
Northern Wasco PUD
dwight@nwasco.com
541-298-3300
2345 River Road
The Dalles OR 97058

Given the many years of data and information that is before us, it would be completely irresponsible for us to not reduce summer spill. How long will we let unsupportable and unjustified actions continue and override what is right. There is never a wrong time to do what is right. It is right to reduce summer spill. The citizens of this community and the Pacific Northwest deserve our best, most responsible actions and efforts. We support the Preliminary Proposal for Federal Columbia River Power System Summer Juvenile Bypass Spill Operations report. Respectfully, Dwight Langer, General Manager, Northern Wasco PUD, The Dalles, Oregon

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Tuesday, April 06, 2004 13:32
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

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Frank P. Cook
Intalco Alcoa Works
No E-mail Address Submitted

4050 Mt. View Rd.
Ferndale Wa 98248

Dear BPA and Corps of Engineers, I work in an industry that depends on economical power from federal hydroelectric projects in the Northwest. Recent BPA power rate increases have had tremendous impacts, and have put the future of my job in doubt. It is vital that we reverse the upward trend on power costs. I support your common-sense proposal for a more efficient summer spill program. Protecting people as well as salmon is important, and I urge you to proceed. Thank you for the opportunity to comment, Frank Cook

BPA Public Involvement

From: friendbech@earthlink.net
Sent: Wednesday, April 07, 2004 12:23 PM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

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Friend K. Bechtel
Kierstat Systems LLC
friendbech@earthlink.net
509-238-2444
15902 E. Holcomb Rd.
Mead WA 99021

I agree with the following suggested letter drafted by Inland Power and Light supporting more economical alternatives for protecting fish runs on the Columbia drainage system. Sincerely, Friend K. Bechtel As a member and ratepayer of Inland Power and Light, I am concerned about the practice of spilling water over federal dams in July and August. This practice, referred to as "summer spill", is costly to the region's ratepayers, and does not produce sufficient biological benefits to warrant its continuation. I understand that federal agencies are proposing to initiate a three-year program of spill reductions and mitigation actions. I support this proposal which will save the regions ratepayers millions of dollars per year while still protecting salmon and steelhead. While a greater reduction in summer spill is warranted, this proposal is a step in the right direction. It is important that actions taken to protect salmon and steelhead be cost-effective and focused on producing real results. The proposed reduction in summer spill and stepping up other measures to protect fish is both economically and biologically sound. The regions ratepayers and citizens demand no less.

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Tuesday, April 06, 2004 09:58
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://webit2/corporate/kc/home/comment.cfm>

Gary Bass

No E-mail Address Submitted

360-933-0999

1799 Matz RD>

Ferndale WA. 98248

I think it is a good idea, because it saves tax dollars at a time when Gov"t spending is at a all time high.Anytime we can save money and get the same result for the salmon is a blessing.

BPA Public Involvement

From: G.wharton@dhittle.com
Sent: Wednesday, April 07, 2004 8:49 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Gary Wharton
D. Hittle And Associates
G.wharton@dhittle.com
627-4719
815 Columbia Park Trail
Richland WA 99352

Tell BPA the Corps and NOAA Fisheries that the proposal is step in the right direction!

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Wednesday, April 07, 2004 7:19 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://webit2/corporate/kc/home/comment.cfm>

Geri Dickmeier

No E-mail Address Submitted
541 567-1405

Hermiston OR 97838

I am in support of your March 30, 2004, Summer Spill Proposal. I believe the proposal to reduce spills and provide offsets is a move in the right direction for achieving cost-effective salmon recovery. The two initial offsets are a good start and go far in meeting the biological criteria. Any additional offsets must be chosen based on cost-effectiveness and biological benefits.

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Tuesday, April 06, 2004 11:46
To: comment@bpa.gov
Subject: Comment on BPA's Strategic Direction

Comment on **BPA's Strategic Direction**

View open comment periods on <http://webit2/corporate/kc/home/comment.cfm>

greg roberts
alcoa alum. worker
No E-mail Address Submitted

1180 kale lane
bellingham wa 98226

I agree with bpa proposal to save water and save \$\$\$\$. We need jobs in pacific n.w. not fish.

BPA Public Involvement

From: hjames@wrec.coop
Sent: Wednesday, April 07, 2004 9:55 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Hank James
WREC
hjames@wrec.coop
775-752-3328
1451 Humboldt Avenue
Wells Nevada 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as an employee of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: Jack.Speer@alcoa.com
Sent: Wednesday, April 07, 2004 9:32 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Jack Speer
Alcoa Inc.
Jack.Speer@alcoa.com
(509) 663-9331
6200 Malaga/Alcoa Highway
Malaga WA 98828

BPA power rates have caused the closure of most of the aluminum plants in the Northwest, resulting in severe economic hardship to many communities and families in the region. We applaud your efforts to find more efficient ways to meet our obligations to Columbia and Snake river fish, and to reduce power rates. Please adopt your proposed plan. Your efforts to save ratepayer dollars while meeting fish obligations will result in higher employment and a better standard of living for the people of the Northwest. Thank you for this common-sense approach and keep up the good work. Sincerely, Jack A. Speer

BPA Public Involvement

From: jrwebb@lvenergy.com
Sent: Wednesday, April 07, 2004 8:57 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

James R. Webb
Lower Valley Energy
jrwebb@lvenergy.com
307-885-3175
P.O. Box 188
Afton WY 33110

Lower Valley Energy is strongly in favor of reducing the summer spill! The proposal to reduce summer spill is a step in the right direction and we appreciate the time and effort you have put into studying this important issue. We recognize the importance of protecting salmon but think that any measures adopted should be supported by good science. Some of the money saved by spill reduction could be used for mitigation in other areas such as Pikeminnow predator reduction resulting in a net gain in ESA fish. BPA needs to stand up and be accountable for the fish mitigation money it spends. Set realistic goals for fish mitigation and put the regions money to work where it can do the most good, supported by sound scientific principles and and balance your efforts with the economic needs of the region. Thank you. Jim Webb

BPA Public Involvement

From: jbronec@glacierelectric.com
Sent: Wednesday, April 07, 2004 8:42 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Jasen Bronec
Glacier Electric Cooperative
jbronec@glacierelectric.com
406-873-5566
410 East Main
Cut Bank MT 59427

To Whom It May Concern: On behalf of Glacier Electric Cooperative, I want to express my support for the proposed summer spill program. Glacier Electric feels that the proposal of reducing summer spill and providing offsets is going in the right direction for achieving cost-effective salmon recovery. Furthermore, the two initial offsets are a good start and go far in meeting the biological criteria. In addition, it must be noted that any additional offsets must be chosen based on cost-effectiveness and biological benefit. Glacier Electric also feels strongly that other programs need to be looked at and considered. For example: * Further enhancing predator control programs, * Adding avian predation control, * Consider reducing non-tribal commercial harvest if necessary, and * Increasing hatchery production at specific hatcheries that are in the geographic areas of concern. As rural economies struggle to survive, it is extremely important that programs are developed and based on sound reasoning of cost-effectiveness and biological benefit. The cost of electricity has a direct effect on the economy and welfare of our communities. Glacier Electric serves the Blackfeet Reservation and 7000 meters in northwestern Montana. It is important that every effort is made to control all costs. Thank you for the opportunity to comment on this issue. Sincerely, Jasen R. Bronec General Manager - Glacier Electric Cooperative

BPA Public Involvement

From: jcromie@wrec2.com
Sent: Wednesday, April 07, 2004 10:09 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Jeff Cromie
WREC
jcromie@wrec2.com
775-752-2534
744 Tobar St.
Wells NV 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as a Member of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: jmartin@tpud.org
Sent: Wednesday, April 07, 2004 11:22 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Jim Martin
Tillamook P.U.D.
jmartin@tpud.org
503 842-2535
P O Box 851
Tillamook OR 97141

The BPA rates have really had an impact here in Tillamook. The economy is not doing well, unemployment is bad, people are struggling to pay their power bills. Any reasonable way to save money at BPA (and I believe this is reasonable) should be looked at seriously to prevent further economic decline.

BPA Public Involvement

From: workzmec@yahoo.com
Sent: Wednesday, April 07, 2004 8:37 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

J. M. Hulett

workzmec@yahoo.com
406-541-4433
1700 W Broadway
Missoula MT 59808

I fully support the proposed Summer Spill. I believe it is going in the direction that will enhance cost-effective salmon recovery. I think the offsets appear to be a positive way to begin to meet the biological criteria and salmon needs. The offset(s) that make the most sense to me are increasing hatchery production at specific hatcheries that are in the geographic areas of concern and further enhancing predator control programs. Thank You

BPA Public Involvement

From: johndarn@comcast.net
Sent: Wednesday, April 07, 2004 12:12 PM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

John Arn
Member and Ratepayer of IP&L
johndarn@comcast.net

N 17708 Saddle Hill Rd.
Colbert WA 99005

Dear Federal Official: As a member and ratepayer of Inland Power and Light, I am concerned about the practice of spilling water over federal dams in July and August. This practice, referred to as "summer spill", is costly to the region's ratepayers, and does not produce sufficient biological benefits to warrant its continuation. I understand that federal agencies are proposing to initiate a three-year program of spill reductions and mitigation actions. I support this proposal which will save the regions ratepayers millions of dollars per year while still protecting salmon and steelhead. While a greater reduction in summer spill is warranted, this proposal is a step in the right direction. It is important that actions taken to protect salmon and steelhead be cost-effective and focused on producing real results. The proposed reduction in summer spill and stepping up other measures to protect fish is both economically and biologically sound. The regions ratepayers and citizens demand no less. Sincerely, Concerned Inland Power & Light Co. Member John Arn >

BPA Public Involvement

From: jporter@bentonrea.org
Sent: Wednesday, April 07, 2004 10:25 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

John Porter
Benton REA
jporter@bentonrea.org
(509)786-2913
402 7th Street PO Box 1150
Prosser WA 99350

This three year proposal will allow BPA to reduce rates by 3 - 4%! Given the state of our local economy, any kind of relief from the current high energy prices is certainly welcome. This proposal is finally a step in the right direction for BPA, the Corp and NOAA Fisheries!!

April 7, 2004

Mr. Stephen J. Wright
Administrator
Bonneville Power Administration
P.O. Box 3621
Portland, Or, 97208-3621

Mr. Robert Lohn
NOAA Fisheries
Office of Regional Director
7600 Sand Point Way NE
Seattle, Wa. 98115-0070

Brigadier General William T. Grisoli
Commander and Division Engineer
U.S. Army Corps of Engineers
Northwestern Division
P.O. Box 2870
Portland Or. 97208-2870

Dear Administrators Wright and Lohn and Brigadier General Grisoli:

The following are the comments of Northwest Requirements Utilities (NRU) regarding the March 30th proposal for summer spill modifications, the proposed offsets, and consideration of other offsets - *“Preliminary Proposal for Federal Columbia River Power System Summer Juvenile Bypass Spill Operations.”*

NRU is a non profit trade association of 47 public preference utilities that are Full Requirements customers of BPA. Our members account for over 20% of the public preference sales made by BPA, our exclusive supplier of energy. We would like to commend the regional Federal Agencies, the Administration and Congressional Delegation, the Northwest Governors, and the Power and Conservation Planning Council for their assistance in moving this issue forward for full public consideration.

NRU has participated closely in river operation issues over the years. Our conclusion is that currently the FCRPS generation resources are sacrificing generation potential for meager if any benefit for fish. This is due in part to 2000 Bi-Op spill programs in July and August that achieve negligible biological benefit for ESA listed stocks that have already migrated or are being transported in river. We wholeheartedly agree with the August 26th joint statement from NOAA Fisheries, the Corps and BPA that: *“under any survival estimates the costs of the current summer spill program appear exceedingly high compared to any biological benefit.”*

Overall we view the Agencies’ March 30th proposal as a refreshing and scientifically grounded major step in the right direction. It provides desperately needed economic relief, while at the same time offering significant mitigation for ESA listed stocks as well as non-listed stocks. However, we 1) recommend an even larger reduction in summer spill, by eliminating the balance of it in July, and 2) question the need for additional discretionary mitigation funds yet to be defined that go beyond the two recommendations contained in the March 30th proposal. Even if you do not adopt our recommendation to end July spill, as long as the mitigation dollars are not increased, this is a three year demonstration program that we actively support.

Need for Economic Relief Is Compelling

NRU members are contractually committed for a 10 year period through FY 2011 to rely upon BPA as their only source of power supply. From the time those contracts were signed, retail rates have risen about 46%. These high rates continue to place a damper on economic recovery in the Northwest. Assuming about \$40 million in net revenue improvement per year from the March 30th proposal, BPA could count these savings in both 2004 and 2005 summer spill as an offset in the calculation of any FY 2005 Safety Net Cost Recovery Adjustment Clause. This adjustment would reduce wholesale power rates in FY 2005 by about 5% from what they would be with current Bi-Op spill. The need for rate relief is compelling, particularly in the rural, agriculturally based, and low density areas of our region where many of the NRU members are located. If you need additional information regarding current regional economic conditions, please let us know.

The proposal includes an elimination of summer spill in August, for a savings of \$42 million compared to the Bi-Op, and \$5 million for a limited reduction in July. This adjustment fails to capture an additional \$30 million in foregone revenues from continued spill during July at The Dalles, and partial spill at Ice Harbor, Bonneville and John Day. The impact of about 19,000 non ESA listed Fall Chinook that are harvested at a 50% rate is more than offset by the mitigation measures proposed. The impact on ESA listed Snake River Fall Chinook is nearly immeasurable. We would urge the federal agencies by no later than the end of the three year test period to critically re-examine the July spill issue. For the limited number of fish effected, other forms of biologically sound mitigation are available that are far less expensive than spill.

Impacts of Spill Proposal are Extremely Limited for ESA Listed Stocks

In table #1, the impacts of reduced spill operations on ESA listed Snake River Fall Chinook range from 2 – 20 adults using smolt to adult return rates (SARs) ranging from 0.5% to 4.0%. However, applying the recent SARs for Snake River ESA listed fish at 0.32%, included in the March 30th report narrative, it is reasonable to conclude that the number of impacted fish would be in the range of 1-2, prior to any form of mitigation. With the mitigation provided by the Pikeminnow program of 1 – 11 ESA listed Snake River Fall Chinook, then the net impact of the proposal when using the 0.32% SAR is between 0 and 1 fish!

It is reasonable public policy to question whether the Federal agencies should forego an additional \$30 million in revenues associated with continuing spill in July if the impact of ending spill in August is arguably only (1) ESA listed Snake River Fall Chinook. If the ESA listed Snake River Fall Chinook returning adults were projected to be 10 or 20 fish, that would raise the question of a reduction of 1 fish having an important percentage impact on the stock. However, the January 21st Federal Agencies presentation to the Council identifies 2,420 Wild Snake River Fall Chinook adults, using a 2% SAR. This is a conservative 10 year number that does not reflect the vast improvements in returns the last few years.

It is instructive to compare returning adults under the Bi-Op and the March 30th proposal using the same SARs. If the 2% SAR is used, then after Pikeminnow mitigation, an ESA listed Fall Chinook run of 2,420 returning adults would be impacted by less than 5 fish. Given this miniscule and possibly immeasurable impact, NRU supports a full elimination of spill in July and August, and achieving the

related \$77 million in power generation. Any biological impacts could be mitigated by considering funding for some of the additional measures listed in the March 30th report (see comments below).

Estimated Impacts on non ESA Listed Hanford Reach and other Non Listed Fall Chinook are for Stocks that are Harvested

The proposal would affect 885 to 7,080 non listed Hanford Reach Fall Chinook and 690 to 5,520 other non-listed Fall Chinook, a maximum of 12,600 fish prior to mitigation. However, the very cost effective Hanford Reach Anti-stranding mitigation proposal, at \$100,000, is estimated to yield 3,916 to 80,662 returning adult fish. When combined with the Pikeminnow reduction program, the offsetting mitigation impact grows to 4,166 to 88,662 for all non ESA listed stocks.

At face value, the mitigation measures more than offset the impact of the change in spill. However, to understand the relative magnitude of these numbers, the March 30th proposal could have been enhanced by providing data regarding the historic or estimated future size of the returning runs for all Fall Chinook stocks, as well as recent years' returns of adults. This is particularly relevant because the Hanford Reach Fall Chinook stock is the strongest numerically, and is subject to a heavy harvest rate, totaling 50% for both ocean and in river.

The Federal agencies in other documents (January 21st Summer Spill Analysis) totaled all of the returning Fall Chinook stocks to be 384,000. We believe this is a 10 year average. In fact, for 2003, the number of returning adults passing Bonneville dam exceeded 600,000. It is our understanding that using 2003 data, Columbia and Snake River Fall Chinook are harvested in river at a rate of 32% of the total population estimated to return to the Columbia River. 8% of this occurs downriver in zones 1-5 and 24% in zone 6.

Using the conservative 10 year average of 384,000 returning adults counted at Bonneville dam, and 2003 harvest ratios, we can project that roughly 30,000 could be harvested in the lower river, and 92,000 above Bonneville. For comparison purposes, using the highest impact of the modified spill proposal prior to mitigation, (12,600 for non ESA listed stocks), the spill proposal has only one tenth the impact of all in river harvest, and four tenths the impact of non treaty harvest in the lower river. These ratios would be even lower if we used recent years' returns of adults.

With the Pikeminnow and Hanford Reach Anti-stranding mitigation measures proposed, the positive effect on non ESA listed stocks is reported to be 4,166 to 88,662 returning adults. That is to say the mitigation impact from these two actions is nearly seven times the adverse impact from the modified spill proposal. Based upon this information, we do not believe the mitigation measures need to be expanded for non ESA listed stocks beyond those specific actions recommended in Part B – the Proposed Offsets, and do not need to include “Other Mitigation Actions.”

We understand that there are parties that have a strong economic stake in fishing in river for non ESA listed stocks of Fall Chinook. However, even without any mitigation, 12,600 fish would be lost compared to the 122,000 that are harvested in river. The \$40 million in generation savings produced is equivalent to \$3,175 per fish prior to mitigation. Given this magnitude of dollars, there ought to be an opportunity among willing participants to reduce fishing for returning non ESA listed stocks if necessary to bolster the number of returning adults.

The Two Mitigation Proposals Make Sense and Should be Adopted

Expansion of the Pikeminnow eradication program makes sense as an offset, and is projected to offset 1 to 11 of the 2 to 20 ESA listed adult Fall Chinook that are reportedly impacted by the summer spill change, about 50%. The enhanced Pikeminnow program is estimated to cost between \$1 - \$3 million per year. We believe there is sufficient scientific information to justify this investment. According to the proposal, this would eliminate between 15,000 and 40,000 voracious predators of juvenile salmon.

The Hanford Reach Anti-stranding Proposal is relatively inexpensive at \$100,000, has a huge impact on non ESA listed stocks, and should be adopted.

Council Fish and Wildlife Program Enhancement

NRU appreciates the role the Council has played in facilitating the three year test of summer spill. The adopted Mainstem Amendments in 2003 that include support for the hydrosystem performance standards and an examination of the current program helped set the stage for this March 30th proposal. To the extent the program is fully implemented to achieve the power market value of summer spill, we are willing to support a maximum of \$5 million of additional funding for the Council for a two year period only. While not endorsing specific programs, we believe this will provide sufficient financial flexibility for the Council and BPA to complete programs that were previously adopted and contractually committed, but where for a variety of reasons funds may no longer be available. However, our support is predicated on acceptance of the summer spill reduction package.

Placeholder Estimate for Offsets Under Consideration

With regard to other measures the government may be considering, we do not support funding them unless additional power generation revenues are to be available due to further curtailments of spill during the month of July. If that were to happen, then we would recommend three measures for your consideration, which we believe have the greatest biological benefit to returning adult stocks of Fall Chinook. These include:

- Additional Removable Spillway Weirs – direct benefit to juvenile fish and very cost effective
- Commercial Harvest Reductions (non tribal) – direct benefit to adult fish
- Avian Predation Research – proven and effective.

Conclusions

Thank you for taking public comments. A number of individual members of NRU may be submitting comments, which will likely be briefer, but will carry a common theme. ***High electric rates are impeding our economic recovery. Rates can be lowered by reducing summer spill, and cost effective mitigation measures will accomplish this without harming Fall Chinook.*** This is a unique opportunity, and there is more than sufficient information to make a decision using the best available scientific information. The numbers are compelling and require decision makers to apply common sense rather than perpetuating a status quo that has failed electric customers and produced meager if any benefit to fish stocks compared to available alternatives. The risk factors seem to have an adverse

impact on 1 ESA listed Fall Chinook. The risk factors to non-ESA listed Fall Chinook are more than offset by the mitigation proposed and apply to stocks that are harvested at an overall 50% rate.

On balance the March 30th proposal is a major step in the right direction, and we look forward to working with you to make these adjustments in river operations and in implementing the mitigation measures as early as possible in 2004.

Respectfully,

John Saven, CEO

CC: Members of the Northwest Power and Conservation Council
Members of the Northwest Congressional Delegation
Members of Northwest Requirements Utilities

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Wednesday, April 07, 2004 7:48 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://webit2/corporate/kc/home/comment.cfm>

Kelly McGreer

Wasco Electric Cooperative, Inc.

No E-mail Address Submitted

541-489-3251

P.O. Box 18

Antelope OR 97001

I support the BPA summer spill program. I believe the current program is a waste of water for power because it is ineffective and not supported by science.

BPA Public Involvement

From: ken.sugden@flatheadelectric.com
Sent: Wednesday, April 07, 2004 6:45 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Kenneth Sugden
Flathead Electric Cooperative
ken.sugden@flatheadelectric.com
406-751-4401
2510 US Hwy 2 East
Kalispell MT 59901

The summer spill proposal now proposed by the Federal Agencies is a step in the right direction. The two offsets are a good start towards meeting the necessary biological criteria. Any additional offsets should be chosen with cost effectiveness and biological benefits in mind. Some offsets that should be considered include: (1) further enhancing predator control programs, (2) adding avian predation control, (3) consider reducing non-tribal commercial harvest if necessary, and (4) increasing hatchery production at specific hatcheries that are in the geographic areas of concern. As I said, the summer spill proposal is a step in the right direction. Don't reduce the proposal and go backwards in logic.

BPA Public Involvement

From: kindlejohnny@yahoo.com
Sent: Wednesday, April 07, 2004 9:42 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Kindle Johnny
WREC
kindlejohnny@yahoo.com

1735 Mountain View
Wells NV 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as a member of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: krism@inlandpower.com
Sent: Wednesday, April 07, 2004 12:03 PM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Kris Mikkelsen
Inland Power & Light
krism@inlandpower.com
509-747-7151
320 E. 2nd Ave
Spokane WA 99202

Inland's Comments on Federal Agencies Proposal to Reduce Summer Spill Re: Preliminary Proposal for Federal Columbia River Power System Summer Juvenile Spill Operations The elected Board of Trustees of Inland Power and Light Company (Inland), which serves over 33,000 electric customers in eastern Washington and northern Idaho, supports the proposal to initiate a three-year program of spill reductions and mitigation actions. While it is our view that more spill reductions and related savings could be achieved without harming fish, we support the proposal as a step in the right direction. Summer spill, which on average costs \$77 million per year, is clearly of little value in terms of protecting endangered salmon and steelhead species. The proposed reduction in summer spill, while not as substantial as we believe is warranted, would nonetheless be of significant economic value to the ratepayers of the Bonneville Power Administration. This is particularly the case when other mitigation actions costing far less than summer spill can promptly be undertaken. These other mitigation actions will more than make up for any potential impacts on listed and non-listed fish species related to a reduction in summer spill. Inland is supportive of sound, cost-effective efforts to improve the number of salmon and steelhead returning to the Columbia River system. We support the views of the four Northwest Governors on this matter as expressed in their letter of March 29. It is important that the states' economies be improved without lowering the standards to protect the environment. The proposal is a positive step in this direction. Sincerely, Kris Mikkelsen, CEO On Behalf of the Board of Trustees Inland Power & Light Company Cc: Governor Locke Northwest Power and Conservation Council Northwest Congressional Delegation

BPA Public Involvement

From: lmj@wrecwireless.coop
Sent: Wednesday, April 07, 2004 9:41 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Layla Johnny
WREC
lmj@wrecwireless.coop
775-752-2350
443 4th Street
Wells NV 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as a member of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Wednesday, April 07, 2004 09:27
To: comment@bpa.gov
Subject: Comment on BPA's Strategic Direction

Comment on **BPA's Strategic Direction**

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Linda L. Wilson

No E-mail Address Submitted

541 298-1065
4015 Fivemile Road
The Dalles OR 97058

I would like to respond to my concern about Summer Spill. As an electric customer of Wasco Electric Cooperative, here in The Dalles, I am concerned about BPA's skyrocketing electrical costs which I pay in my rates and the notion that when it comes to saving a fish, all common sense reasoning is thrown out the window. I am in favor of the Corps and BPA's proposal regarding modifications to the summer spill program. I understand the 3-year proposal would save about \$40 million per year and would reduce power rates in 2005 by close to 5% from what they would be without the proposal. I feel the Corps and NOAA Fisheries proposal to reduce summer spill is a step in the right direction and it is about time!

BPA Public Involvement

From: labbott@wrec2.com
Sent: Wednesday, April 07, 2004 9:38 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Lonnie Abbott
Wells Rural Electric Co
labbott@wrec2.com
7757521516
Po Box 617
Wells Nv 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as a member of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: lcromie@wrec2.com
Sent: Wednesday, April 07, 2004 9:57 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Lynn Cromie
Wells Rural Electric Company
lcromie@wrec2.com
775-752-3328
1451 Humboldt Ave
Wells NV 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as a member of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Tuesday, April 06, 2004 11:04
To: comment@bpa.gov
Subject: Comment on BPA's Strategic Direction

Comment on **BPA's Strategic Direction**

View open comment periods on <http://webit2/corporate/kc/home/comment.cfm>

Mark Moldenhauer

No E-mail Address Submitted

(360)398-7754

239 W. Hemmi

Bellingham Wa. 98226

As a consumer in the PNW of BPA power I support the plan to reduce the fish flush or spilling of extra water. I think it would be wiser to look into more cost effective plans to save the salmon. This also will make the BPA look into a way we could save more salmon along with other government agencies. The spilling of the extra water and not producing power has had it test. Now is the time to explore new ideas and find a better way than doing business as usual. Mark Moldenhauer

BPA Public Involvement

From: Fortnelson@aol.com
Sent: Tuesday, April 06, 2004 4:42 PM
To: comment@bpa.gov
Subject: Comment on BPA's Strategic Direction

Comment on **BPA's Strategic Direction**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Michael L. Nelson
Co-op Customer
Fortnelson@aol.com

77499 Bar B-L Ranch Road
Oakridge OR 97463

I am a retired commercial salmon fishery biologist from the State of Alaska. I spent my career working for the balanced use and continuation of the salmon resource. It makes so much sense to me to try other mitigation efforts, rather than spill, to achieve salmon recovery. It seems, so far, that this effort has been basically to throw millions of dollars at the problem in the hope that something might work. This has resulted in a dollar cost invested per individual salmon that makes no sense biologically or ethically and is rapidly exceeding the ability of electric rate payers to sustain. Please take a look at the alternatives of expanded predator control and reduction in harvest as necessary before continuing to raise the cost of essential services. Thank you.

BPA Public Involvement

From: mcromie@wrec2.com
Sent: Wednesday, April 07, 2004 9:29 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Mike Cromie
WREC
mcromie@wrec2.com
775-752-3328
1451 Humboldt Ave
Wells NV 89835

Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as the Operations Manager of Wells Rural Electric Company that the proposal is positive. It will save about \$40 million per year. The savings from 2004 and 2005 will be enough to reduce power rates in 2005 by close to 5% from what they would be without the proposal. For ESA listed Snake River Fall Chinook the spill adjustment impacts less than 20 returning adults. Increases in the Pikeminnow predator reduction program will mitigate for half of the ESA listed fish that could be lost from spill reductions. The net impact is less than 10 ESA fish. The runs for non-ESA listed Fall Chinook currently exceed 384,000 fish. Approximately 123,000 of these are harvested in the river. The impact for proposed spill adjustments is 12,600 but the mitigation measures will produce 88,662 returning adults. For these reasons, and more, the proposal is a good one.

BPA Public Involvement

From: mpeterson@utahcooperatives.org
Sent: Wednesday, April 07, 2004 11:26 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Mike Peterson
Utah Rural Electric Association
mpeterson@utahcooperatives.org
801-619-6550
10714 South Jordan Gateway
South Jordan Utah 84095

The Utah Rural Electric Association represents, in addition to Utah based rural electric cooperatives, rural co-ops headquartered in Nevada and Idaho that are Bonneville customers. On behalf of these members we strongly support the proposal to modify the summer spill program. Since customers of rural electric cooperatives are the owners of the utility, any increase in expenses is shouldered by them alone. Likewise, any savings directly benefits the member/owner. With projected cost reductions of \$40 million per year, new rate increases could be mitigated by up to 5%. This is a tremendous benefit to our rural electric cooperatives. Given that the impacts to fish are so minimal, and that the benefits to ratepayers are so great, we firmly believe the proposal is a good one. Sincerely, Mike Peterson
Executive Director Utah Rural Electric Association

BPA Public Involvement

From: randall@eotnet.net
Sent: Wednesday, April 07, 2004 8:56 AM
To: comment@bpa.gov
Subject: Comment on BPA's Strategic Direction

Comment on **BPA's Strategic Direction**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Randall Kowalke
Public power employee
randall@eotnet.net
541-289-6900
1314 NE Gladys Drive
Hermiston OR 97838

Dear BPA, I solidly support your initial efforts! The proposal of reducing spill and providing offsets is going in the right direction for achieving cost-effective salmon recovery. The two initial offsets are a good start and go far in meeting the biological criteria. Any additional offsets must be chosen based on cost-effectiveness and biological benefits. Please see below for my comments / recommendations regarding specific offsets: further enhancing predator control programs, adding avian predation control, consider reducing non-tribal commercial harvest if necessary, and increasing hatchery production at specific hatcheries that are in the geographic areas of concern. Thank you for your consideration! Randall Kowalke