

BPA Public Involvement

From: alan@epud.org
Sent: Wednesday, April 07, 2004 15:44
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>

Alan Zelenka
Emerald PUD
alan@epud.org
(541) 744-7464
33733 Seavey Loop Road
Eugene OR 97405

Emerald PUD has adopted the following position on the Summer Spill issue: 1. Salmon survival and restoration is the most important goal in the Summer Spill debate. 2. Accomplishing this cost-effectively is a goal. 3. We support testing in 2004 of different alternatives to the current Summer Spill program that have a more than reasonable expectation of achieving a beneficial net impact on salmon through offset programs that are paid for through the savings.

BPA Public Involvement

From: sherriedan@hotmail.com
Sent: Wednesday, March 31, 2004 8:41 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>

Sherrie Duncan
Ridolfi, Inc
sherriedan@hotmail.com
253-576-7063

Tacoma WA 98407

This is absurd! I do not agree with this plan. It seems awful greedy and goes directly against federal plans for saving Pacific Northwest salmon. I do not believe sending electricity to California for a profit is worth the loss of a Pacific Northwest icon!!!

BPA Public Involvement

From: egebrthome@wellsrec.net
Sent: Thursday, April 08, 2004 19:38
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>

Scott Egbert

egebrthome@wellsrec.net

H.C. 60 Box135
Wells NV 89835

Attention: Bonneville Power Administration Corps of Engineers NOAA Fisheries Subject: Support for proposal regarding modifications to the Summer Spill Program It is my position, as a director 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: scotta@nezperc.org
Sent: Wednesday, March 31, 2004 3:49 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>

Scott Althouse
Nez Perce Tribe
scotta@nezperc.org
503-358-6462
POB 1242
Lewiston ID 83501

BPA: I encourage you to change your decision regarding the proposed reductions in spring and summer spill on the FCRPS. Short of breaching the dams, spill is the single most beneficial action for reducing mortality associated with out-migrating juvenile salmon and steelhead. By reducing or eliminating spill, the effectiveness of other off-site mitigation (habitat work and supplementation) above the FCRPS is greatly reduced. I find BPA's recent decision completely at odds with the Northwest Power Act's requirement to give "equitable treatment" to fish and wildlife, as well as the Endangered Species Act section 7 requirement that all agencies shall further the purposes of this act to conserve and recover listed species. To the contrary, reducing or eliminating spring and summer spill once again tilts the balance in favor of power, rather than fish, and further jeopardizes the continued existence of threatened and endangered salmon and steelhead in the Columbia and Snake River Basins. Such actions do not support the trust obligations of the United States to protect and enhance the opportunities for tribal members to exercise their treaty rights to fish at all usual and accustomed grounds and stations. I respectfully request that BPA withdrawal this and other proposals to reduce or eliminate spring and summer spill on the FCRPS. Sincerely, Scott Althouse

BPA Public Involvement

From: rizzibear@direcway.com
Sent: Sunday, April 04, 2004 10:59 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>

Russell
none -Elect user
rizzibear@direcway.com
541-459-8256
1301 hogan
Oakland oregon 97462
Stop wasting our money .Stop this dumb spill program .Stop spending \$600 million on dumb fish.Look for other ways
to save fish.Remember you are a electric producer

BPA Public Involvement

From: ricb@ravallielectric.com
Sent: Wednesday, April 07, 2004 11:13 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>

Richard J. Brown
Ravalli Electric Co-op
ricb@ravallielectric.com
406-961-3001
PO Box 190
Corvallis MT 59828

April 7, 2004 Mr. Steve Wright Administrator Bonneville Power Administration Post Office Box 3621 Portland, Oregon 97208-3621 Dear Mr. Wright: Ravalli Electric Co-op has long been a supporter of good science in the salmon recovery arena. The purposed summer spill reduction is a good start and the culmination of efforts by a lot of people for a number of years to bring science to the forefront. The following comments are a consensus of support within the utilities and strongly supported by Ravalli Electric Co-op. Support for Reduced Summer Spill May 2004 • The Corps of Engineers, NOAA-Fisheries and Bonneville Power Administration have proposed a reduction in the costly and wasteful summer spill program. • The summer spill program is aimed at helping move endangered Snake River fall Chinook juveniles downstream by spilling water over the dams during July and August. Over 90 percent of these juveniles are safely collected and transported downstream by barge and thus do not benefit from summer spill. Summer spill costs Northwest ratepayers \$77 million per year on average, yet it only provides at most 20 additional returning fall Chinook adults. • Some non-ESA listed salmon are also the subject of summer spill. Primarily from the Hanford Reach of the Columbia River, these fish are harvested at a rate of 50 percent or more each year. Only 5 percent of these fish will be affected by a reduction in summer spill. • There are much more cost-effective mechanisms to more than replace the fish potentially lost from the reduction in summer spill. Increasing the Northern pike minnow bounty program, additional habitat restoration and avian predator control can all be used to more than supplant the losses due to reduced spill at a far lower cost. • All four Northwest governors support a reduction in summer spill. • The reduction in summer spill proposed by the federal agencies would save ratepayers \$35-45 million per year. • In addition to the reduced summer spill, the federal agencies also proposed changes in the operation of Libby and Hungry Horse reservoirs. The proposed changes will keep the reservoir levels higher so as to help native fish, including the endangered bull trout. • We support the proposals of the federal agencies and ask you to help make these proposals a reality. Thank you for your consideration. Sincerely, Richard J. Brown General Manager cc: Bob Lohn, NOAA Fisheries Jerry Leone, Public Power Council

BPA Public Involvement

From: macriver@cableone.net
Sent: Wednesday, April 07, 2004 11:06 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>

Richard Bliss
U. S. Citizen
macriver@cableone.net
208-743-4323
1520 Linden Ave.
Lewiston ID 83501

After reading and studying the proposal, I see no viable alternative other than to void it and retreat to current status. Mitigating half the proposed upriver salmon loss is not acceptable. These stocks are listed and require a minimum of the protection and enhancement they have had in the past. If BPA wants to produce more power, then it should be up to it to find ways to be more efficient and to produce more power with less harm to our anadromous fisheries. The goal here should be to devise better and more productive methods of generating power and protecting more fish, both out migrating and returning. As your proposal and suggested mitigation techniques will not enhance these runs, but would destroy more of these fish, it should be abandoned and your time spent on coming up with alternatives as suggested above. That is the way the rest of us run our businesses and personal lives. Sincerely, Richard Bliss Lewiston, Idaho

BPA Public Involvement

From: pdwl1999@yahoo.cm
Sent: Thursday, April 01, 2004 11:39 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>

p lindsay
citizen
pdwl1999@yahoo.cm

9842 49 ave sw
sea wa 98136

The new summer spill program will not meet the needs of salmon. The major obstacle appears to be the very slight raise in the price of future power. We cannot afford to sacrifice the few remaining salmon for a little bit of money. In addition the new proposal does not fall in line with the scientific data gathered by fish and wild life experts. The proposal looks like a slight of hand- the appearance of doing the right thing while in fact doing the worst thing for the salmon. Please reconsider. Paula Lindsay

BPA Public Involvement

From: pat.flaherty@alcoa.com
Sent: Tuesday, April 06, 2004 7:08 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>

Pat Flaherty
IAM&AW
pat.flaherty@alcoa.com
(360) 384-7515
5987 Sunshine Dr.
Ferndale Wa. 98248

Dear BPA and the Corps of Engineers: I'm a member of the International Association of Machinists and Aerospace Workers and employed at Alcoa Intalco Works in Ferndale Wa. Intalco employees about 500 people whose jobs depend on the supply of affordable power from federal hydroelectric projects in the Northwest. With the recent BPA power rate increases having a tremendous impact on our facility (Loss of nearly 300 jobs), families and community it is vital that we reverse the upward trend of power cost. We support your common-sense proposal for a more efficient summer spill program. Protecting salmon and steelhead at lower cost is the right direction and we you to proceed with this plan. Anything that can be done in the Northwest to help save existing jobs should be considered. This is the logical direction, to save more fish at a more cost effective approach. Thank You Pat Flaherty

BPA Public Involvement

From: nickhughes@charter.net
Sent: Wednesday, March 31, 2004 6:16 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>

Nick Hughes

None

nickhughes@charter.net

509-728-0180

903 N. 34th Ave. #2

Yakima WA 98902

Holding back some water flows are beneficial to more people than the few extra salmon that may be saved by not doing so. Saving salmon is good, but there has to be a fair effort that impacts all interests positively, not just one group or another. As to profit-taking accusations by parties against corporate business in general, I have seen too much profiteering by tribal individuals selling their supposed precious subsistence salmon and disappearing into the local bars while the rest of their catch rots in the sun in the back of their pick-ups. The extra millions that it costs the general public for this abuse of religious freedoms is simply not worth the price.

BPA Public Involvement

From: natel@nezperce.org
Sent: Wednesday, March 31, 2004 3:34 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>

nate lengacher
concerned fisherman/biologist Nez Perce Tribe
natel@nezperce.org
406-777-3819
660 Pine Hollow Rd
Stevensville MT 59870

I would like to register my extreme displeasure with the proposed summer spill reduction. In the face of a Biological Opinion which has been found inadequate by the Federal Judiciary in its continued reliance on "offsite mitigation" and habitat restoration, how can you folks continue to turn a blind eye to the issue at hand...the dams themselves. Efforts to pass adults and juveniles upstream and downstream, respectively, need to be increased, not decreased. Increasing funding for symptoms of this problem like non-native predation while ignoring root causes is like feeding an appendicitis victim morphine. It feels good till everybody's dead. Perhaps this is the real agenda of BPA-once all stocks are extinct-no more problem. Get a clue guys, CA needs to deal with their energy addiction, and you all need to adhere to your responsibilities to the resources you've exploited for so many years. Nate Lengacher

BPA Public Involvement

From: nichson@earthlink.net
Sent: Wednesday, March 31, 2004 7:38 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>

Mike Nicholson
retired military
nichson@earthlink.net

174 Sunny View Drive
Sequim WA 98382

I fully support releasing less water in order to generate more electricity. There are plenty of salmon out there and we need to start thinking about us humans. I'm on a fixed income, and I cannot afford to pay more and more for electricity. Let's think of us "humans" for a change.

From: m.denny@charter.net

Sent: Tuesday, March 30, 2004 3:44 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>

Mike Denny

Blue Mountain Audubon Society

m.denny@charter.net

509-529-0080

323 Scenic View Dr.

College Place WA 99324

Hello, I am writing to suggest the following: A. reduced spills will cause pools above the dams to remain high. This will inundate MANY areas that are VITAL to shorebird migration. The lake Wallula Pool will remain between 339-340 and that will deprive thousands of migrating protected shorebirds of very important resting/loafing/feeding sites such as the Walla Walla River delta, the Yakima River delta and the Umatilla River delta just to name a few prominent sites. Fall Shorebird migration begins in late June and is complete by early November. Spring Shorebird migration begins in mid March and is mostly complete by late May. The impact of a high pool on lake Wallula to migrating shorebirds must be considered and mitigated for. There are many other protected native species dependant on shorelines along the Columbia River and its slack water pools. Salmon are just a part of the big picture, not the whole picture. What about native mollusks such as fresh water mussels, what will deeper pools mean to them? Higher pools will allow a very successful CARP spawning season. low pools hinder Carp from reaching shallow mudflats and side channels where they spawn. Reduced flows will NOT stop D.C. Cormorants, Caspian Terns, California Gulls and Ring-billed Gulls, American White Pelicans or Common Mergansers from eating hatchery raised salmonids. These ignorant fish will always fall victim to dams and our native skilled avian predators. Shooting these PROTECTED birds or reducing their numbers by poisoning, adding eggs or inhibiting nesting all to protect hatchery salmonids is nuts and will prove futile, so don't even consider it. That is until the huge unnatural, introduced, highly predatory populations of Mississippi River spiny rays are dealt with in a meaningful way. Large and Small Mouthed Bass, both Crappie, The sacred Walleye Pike, Bluegill and Yellow Perch must be eliminated. Why should our native birds be blamed and pointed at as the "big problem" when all these salmon eating spiny rays and carp dominate the entire Columbia River System. These non-native fish consume huge numbers of smolts and yet I never hear the powers to be say anything about that. I believe that 35% of all smolt entering the John Day pool are devoured by bass and walleye alone. So until these introduced fish are dealt with in like manner as is being proposed for our native birds maybe reduced flows and other more lethal ideas might be shelved. I understand the reduced flow idea and how it might just change hatchery fish mortality. I doubt it. Thank-you Mike Denny

BPA Public Involvement

From: mgendron@ifpower.org
Sent: Monday, April 05, 2004 2:57 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>

Mark Gendron
Idaho Falls Power
mgendron@ifpower.org
208-529-1430
140 S. Capital, P.O. Box 50220
Idaho Falls ID 83405

Idaho Falls Power appreciates the opportunity to comment on the recent proposal by the Federal Agencies to test a reduction in summer spill on the Federal Columbia River hydro system. We understand the spill reduction proposal can be accomplished within the flexibility of the Biological Opinion, would effect only summer months, and that the effects on fish would be mitigated through other measures, or "offsets". Although all offsets have not been completely identified, net savings are estimated to be between \$35 million and \$40 million per year. Idaho Falls Power applauds the Federal Agencies for exploring and recommending a change in the operation of the hydro system that would save Northwest electric ratepayers real money while continuing to meet our obligations to protect and enhance the fisheries in the region. We strongly support the recommendation and further ask that the offset measures ultimately selected be those that provide the most value to both fish and ratepayers. Thank you very much for the opportunity to comment and we look forward to your final decision on this very important matter.

BPA Public Involvement

From: buzzandpat@msn.com
Sent: Wednesday, March 31, 2004 2:08 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>
Lloyd M. Hettick

buzzandpat@msn.com
307-742-9247
1625 Spring Creek Drive
Laramie WY 82070

I'm writing this comment in regard to the summer spillage proposal. I find it perplexing, to say the least, that the BPA is once again failing to meet objectives and obligations to anadromous in the Columbia River and its tributaries. As a condition of allowing dams on the Snake and Columbia rivers, the anglers, tribes, and citizens of the United States were assured certain things, some of which are the following: 1. No loss of fish or fishing opportunities. 2. Mitigation of fish numbers through hatcheries. 3. No loss of remaining wild strains of anadromous fish. 4. Guarantee of water supply to aid anadromous fish. Since these "promises" were made, the anadromous fish in the Columbia River and its tributaries have seen nothing but continual declines and struggles. Water promised has not been met, smolt survival in many years is non-existent, adult returns are not hitting levels promised, and every run of wild anadromous fish in the Columbia River system is now listed as threatened under the Endangered Species Act. How an agency can defend what has happened in regard to anadromous fish since the development of the dams on the Snake and Columbia rivers is really incomprehensible. The BPA has tried all the things they say will help salmon, turbine screens, predator control, more and more hatcheries, etc. etc. etc. These practices have already cost the U.S. taxpayer over 1 billion in recovery efforts. The result of these "techno" fixes has not helped, and in some cases has actually harmed wild runs of anadromous fish. What is needed to aid anadromous fish and their recovery is not more of the same. Throwing money at more hatcheries, more turbine screens, killing more fish predators, will not do any good. How long and much more money must we spend to realize this simple thing?: For anadromous fish to thrive, they need water, in particular when they are trying to migrate through dams. I'm beginning to wonder if the BPA was actually involved with, read, or understood the data in the PATH report...over 100 top biologists from many agencies all agreed that impairment of flows and dams were the leading cause of loss of anadromous fish. Now, with the knowledge of what is vital to salmon the BPA is recommending we throw away more money on faulty recovery efforts and hold water that's vital to anadromous fish? As a professional I've studied fisheries and looked at many impaired species and water-sheds. However, one does not need to have a degree to understand that the BPA is failing at anadromous fish recovery and its promises. My recommendation to the BPA is to allow increased flows of water that they agreed to, in particular at crucial times to flush migrating smolt to the ocean. This alone will do more to help anadromous fish than all the predator control, hatcheries, and turbine screens combined. The BPA is at a cross roads here, and by failing to take action to do the right thing (increase flow), I feel impending lawsuits will soon follow. Myself and many others are under the impression the various Tribes are seriously considering legal action. Understand that treaties have been upheld by the U.S. supreme court and according to them is recognized as "high law". With the threat of a 120-200 billion dollar lawsuit by the tribes, I (as a U.S. taxpayer) strongly urge the BPA to do everything, including allowing increased flows, to help in the recovery of salmon. Thank you for the opportunity to comment. Lloyd M. Hettick

4/16/2004

BPA Public Involvement

From: laura@nvec.org
Sent: Wednesday, April 07, 2004 9:11 AM
To: comment@bpa.gov
Subject: Comment on Summer Spill Proposal

Comment on **Summer Spill Proposal**

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Laura McClure
Nespelem Valley Electric Cooperative, Inc.
laura@nvec.org
509 634-4571
1009 F Street
Nespelem WA 99155-0031

I am in favor of the BPA proposal regarding modifications to the summer spill program. The three year 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. As a ratepayer, please implement the proposal.

BPA Public Involvement

From: kws58@werval.com
Sent: Thursday, April 15, 2004 9:17 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>

Kevin Schoenwald
Chelan Co. PUD Customer
kws58@werval.com
509-667-2300
319 Methow Street
Wenatchee WA 98801

Please! Given the lack of benefit for Salmon from the Summer Spill Program DON't CONTINUE TO SPILL! (Unless you like wasting money.)



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

April 7, 2004

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

RE: COMMENTS ON FEDERAL SUMMER SPILL PROPOSAL

Dear Sirs:

PNGC Power and its members, who are consumer-owned electric utilities throughout the Northwest, support cost effective salmon recovery measures and are pleased that the federal agencies have proposed to reduce summer spill operations for a three year period. While the March 30, 2004 document falls short of proposing a preferred full elimination of summer spill, PNGC Power believes the proposed reductions and the identified offsets are a good first step. Combined, the proposal represents a move towards greater efficiency in achieving regional mitigation goals. This is an opportunity to bring even more fish back to the river at greatly reduced cost.

PROPOSED REDUCTIONS TO SUMMER SPILL

In a joint executive statement dated August 26, 2003, the regional executives of the Corps, BPA and NOAA Fisheries stated that “under any survival estimates the costs [of the current summer spill program] appear exceedingly high relative to the biological benefit and that the agencies have a “responsibility to the region to devise an approach that is less costly...” We are appreciative of the federal agencies’ efforts to meet this obligation and believe that the preliminary proposal to eliminate spill in August and reduce it in July represents a step in the right direction.

As you know, the summer spill program is the costliest salmon recovery effort currently implemented and is only one of 199 actions in the 2000 Biological Opinion (BiOp) and was intended to protect juvenile ESA-listed fall chinook salmon migrating from the Snake River. While only a tiny fraction of the fish benefiting from summer spill operations are listed as threatened, the framework and language of the 2000 BiOp compels federal agencies to compare various alternatives to achieve survival performance standards for listed species. Support for accountability and better results is consistent with full implementation of the BiOp, with the

Pacific Northwest Generating Cooperative
711 NE Halsey • Portland, OR 97232-1268
(503) 288-1234 • Fax (288) 2334 • www.pngc.com

recent statements of many of the region's elected officials¹ and with the agencies' responsibility to the region's electricity ratepayers. (Please find additional comments on summer spill and related offsets in the attached March 16, 2004 letter to the regional executives of BPA, NOAA Fisheries, USBR and the Corps.)

However, the proposed spill action still represents an estimated yearly cost to the region's ratepayers of \$30 million, with only very limited biological benefit to salmon. In light of the economic impacts of unnecessarily high electricity rates, it is important to present the following table:

	Fish benefiting from proposed spill action	Cost per fish benefiting from proposed spill action
ESA-listed Snake River fall chinook	2 to 20	\$15 million to \$1.5 million
Non-listed fall chinook	1,575 to 12,600	\$19,000 to \$2,380

THE PROPOSED OFFSETS

We believe that available mitigation measures can more than offset any impacts to fish from reduced spill. We support implementation of the two offsets highlighted in the proposal. Each of these offsets is based on a program that has enjoyed considerable and widely acknowledged success in the region. Additionally, each represents a considerable relative savings to ratepayers while providing similar or greater benefit to fish affected by changes to the summer spill program.

Furthermore, while we recognize that there has been some disagreement as to the overall *numerical* benefit to fish provided by these offsets, we note that their estimated effectiveness has been portrayed very conservatively in this proposal. We believe that these offsets alone fully mitigate for fish losses as a result of changes in summer spill operations.

- Enhanced Northern Pikeminnow management
 - We note that the estimated effectiveness of this program has been diluted considerably since it was first introduced as an offset. We believe the prior estimates to be more reliable.
 - Enhancement of this program will benefit all salmonid stocks in the river system.
- Hanford Reach stranding protection flows
 - This is a proven program that will further benefit healthy runs of Hanford Reach fall chinook.

¹ Please see the Four NW Governors' letter dated March 30, 2004 and the letters from NW Members of Congress dated March 12 and March 17, 2004 to the executives of BPA, NOAA Fisheries and the US Army Corps of Engineers.

- Importantly, Grant Co. PUD could not implement these stranding protection measures without assistance from BPA, and
 - BPA's assistance in this regard is provided with the clear understanding that it will be credited as an additional mitigation strategy.
- Finally, the fish that will benefit from this program are not ESA-listed, and are therefore not subject to BiOp related legal concerns. This stock is also harvested at nearly a 50% rate.

ADDITIONAL OFFSETS


In general PNGC supports offsets that maintain the federal agencies stated commitment to cost effective mitigation. Because we are not convinced that additional offsets are needed, spending \$2 - \$5 million on them per the proposal seems unwarranted. However, if the federal agencies feel compelled to select additional offsets they should be based on their ability to achieve the greatest biological benefit for the least cost. The following are additional offsets that could provide further mitigation for the effects of changes to the summer spill program:

- Commercial harvest reductions
 - Currently, the fall chinook salmon affected by changes to summer spill are subject to a total harvest of approximately 50%. Reductions in harvest represent the surest way to ensure that greater numbers of adult salmon return to their spawning grounds or to other fisheries.
 - This offset would benefit both listed and non-listed stocks of salmon.
 - A voluntary buy-out program would be the preferred approach.
- Avian predation research
 - While we recognize that results from this action may not appear immediately, the offset as originally proposed could result in an estimated additional 500,000 juvenile salmonids surviving to the ocean each year.
 - This measure has a proven record and would benefit all stocks in the river, including ESA-listed fish impacted by changes to summer spill.
 - We urge the agencies to seek actions on predation that might be implemented within the three year proposed time frame.
- Smallmouth bass management
 - We are curious as to why this mitigation measure was not included in the preliminary proposal, especially because it has been acknowledged that smallmouth bass prey on juvenile salmon. In fact, the Washington Statewide Strategy said that:
 - *“Non-indigenous predatory fishes such as...smallmouth bass...and native species such as northern pikeminnow (squawfish), have been found to consume significant numbers of juvenile salmonids.”*
 - We believe that targeted smallmouth bass removal could provide mitigation for juvenile salmonid losses due to changes in summer spill, especially for ESA-listed fish.

CONCLUSION

The goal and effect of the federal proposal for summer spill operations is to achieve similar or better biological benefits for salmon at less cost than the current summer spill program. While this proposal represents a positive first step in achieving greater cost accountability in the region's salmon recovery efforts, a full elimination of summer spill would mark real progress in that regard. PNGC Power believes that implementing programs that provide the greatest benefit to salmon at the lowest possible cost represents the best way to achieve sustainable results that will benefit the diverse yet similar interests of citizens in the Northwest.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin S. Banister". The signature is fluid and cursive, with a large loop at the end.

Kevin S. Banister
Manager, Government Affairs and Special Projects
PNGC Power

Attachment

cc: Governor Dirk Kempthorne
Governor Theodore Kulongoski
Governor Gary Locke
Governor Judy Martz
Robert Lohn, NOAA Fisheries
J. William McDonald, USBR
James Connaughton, CEQ
Northwest Power & Conservation Council

Steve Wright, BPA
Brigadier General William Grisoli, USACE
J. William McDonald, USBR
Robert Lohn, NOAA-Fisheries

March 16, 2004

Dear Sirs:

In a February 11, 2004, presentation, the federal agencies responsible for operation of the Northwest river system thoroughly documented the limited biological benefits of the summer spill program and outlined the obvious economic cost to the operation. They estimated summer spill to cost \$77 million dollars to benefit 24 fall chinook salmon listed as threatened under the Endangered Species Act. They also outlined a responsible set of alternatives to summer spill that can bring back more fish at a much-reduced cost to the region.

We are troubled that in his February 20, 2004, letter responding to that presentation, Dr. Jeff Koenings, Director of the Washington Department of Fish and Wildlife, presented disappointing, counterproductive arguments. We believe that the available information argues against the policy positions in Dr. Koenings' letter, and that the evidence supports immediately putting into place offset measures and curtailing the summer spill operation this year.

Attached is a memo prepared by our technical experts to clarify the facts surrounding the summer spill program and to highlight the efficacy of the proposed offset measures.

Sincerely,



C. Clark Leone
Manager
Public Power Council



R. Patrick Reiten
President and CEO
PNGC Power



Richard Adams
Executive Director
PNUCC

cc: Governor Gary Locke
Bob Nichols, Governor's Office
Larry Cassidy, Northwest Power & Conservation Council
Tom Karier, Northwest Power & Conservation Council
Jeff Koenings, Washington Dept. Fish & Wildlife

MEMORANDUM

From: Shane Scott – Sr. Policy Analyst, Fish & Wildlife, PPC
Jim Litchfield – Litchfield Consulting Group for PNUCC
Scott Corwin, Esq. – Pacific Northwest Generating Cooperative

To: C. Clark Leone – PPC
Dick Adams – PNUCC
Pat Reiten –Pacific Northwest Generating Cooperative

Date: March 11, 2004

Subject: Response to WDFW Director Dr. Jeff Koenings' letter to BPA
Administrator Steve Wright, dated February 20, 2004

In his February 20, 2004, letter to Bonneville Power Administration (BPA), the U.S. Army Corps of Engineers (Corps) and the U.S. Bureau of Reclamation (BuRec), Dr. Jeff Koenings, Director of the Washington Department of Fish and Wildlife (WDFW), outlines the policies of the WDFW regarding summer spill as an option to recover salmon in the federal river system. Unfortunately, he provides only criticisms of the proposed summer spill reductions. He does not offer constructive discussion of how to implement programs for salmon recovery more efficiently and effectively.

This memorandum is a response to that letter. In it, we will provide a summary of the issue; an analysis of related WDFW arguments; and a breakdown of proposed offset strategies.

ISSUE SUMMARY

The summer spill program is one of 199 actions in the NOAA-Fisheries (NOAA-F) 2000 Biological Opinion (BiOp) for the federal hydrosystem. The summer spill program was implemented to protect juvenile Endangered Species Act (ESA) listed fall chinook salmon migrating from the Snake River. The Corps says that over 90% of these fish are safely barged from the river each year. According to the recent evaluation by the federal agencies, the summer spill program produces a benefit of only 24 adult ESA-listed Snake River fall chinook salmon. It is evident that this is not a significant ESA issue.

Yet the federal and state fish managers and tribes are arguing to implement the BiOp required summer spill program to benefit *non*-ESA listed fall chinook. These fish are later harvested at a rate of over 50%. Mitigation for non-ESA listed salmon and steelhead stocks are addressed in the Northwest Power and Conservation Council's (Council) Fish and Wildlife Plan, not in the 2000 BiOp.

The Council is required by the Northwest Power Act to develop a plan to protect, mitigate and enhance fish and wildlife resources while assuring adequate, efficient, economical and reliable power supply. In April 2003, the Council issued its updated amendments to the Fish and Wildlife Plan. The amendments call for a study of spill at federal dams with the goal of finding alternatives to spill. The Council declared that it would

... work with the federal operating and fish and wildlife agencies, in consultation with the state fish and wildlife agencies and tribes and the Independent Scientific Advisory Board in a rigorous evaluation of the biological effectiveness and costs of spillway passage at each project and bring that information to bear in a systematic way in decisions on when, and how much, to spill. The goal of this evaluation should be to determine if it is possible to achieve the same, or greater, levels of survival and biological benefit to migrating fish as currently achieved while reducing the amount of water spilled, thus decreasing the adverse impact on the region's power supply.

In summary, opposition to reducing summer spill does not arise from needs to protect ESA-listed salmon and steelhead stocks. The opposition comes from fish management agencies and tribes using the requirements in the BiOp to protect a stock that is heavily harvested. The Northwest Power Act requires that mitigation for non-ESA listed stocks be balanced and efficient. The summer spill program is neither.

THE WDFW ARGUMENTS AND COUNTERPOINTS

1. WDFW asserts that reduction of summer spill would be inconsistent with the “aggressive non-breach” option currently being implemented.

This is not correct. The BiOp contains survival goals that assure recovery of ESA listed salmon and steelhead in the Columbia River. NOAA-F prescribed 199 mitigation actions in the BiOp to meet its survival goals. Summer spill is only one of these actions. The BiOp allows the Action Agencies (BPA, Corps and Bureau of Reclamation) flexibility to adapt mitigation actions based on the best available scientific information.

The BiOp does not require summer spill just for the sake of spill. The latest scientific information indicates that alternate mitigation actions will provide a benefit at least equal to the current summer spill program. The BiOp requires the Action Agencies to modify mitigation actions as necessary to meet survival goals. This flexibility also allows the Action Agencies to implement the most cost-effective mitigation actions necessary to meet the survival goals established in the BiOp.

2. WDFW asserts that the litigation surrounding the 2000 Biological Opinion is reason enough not to alter spill operations this year.

This is not correct. The current lawsuit is not about river operations required in the NOAA-F 2000 BiOp. The focus of the litigation is on the ability of the federal agencies to ensure that off-site mitigation measures are “reasonably certain to occur” per the regulatory standard. Sections 9.1 and 9.4 of the BiOp, among others, clearly allow the flexibility to change the combination of measures used as we learn more about the effects that mitigation measures and the federal hydrosystem have on ESA listed fish stocks.

3. WDFW asserts that the Governors’ June 2003 letter declares that the 2000 NOAA-F BiOp be fully implemented.

Again, full implementation of the BiOp may include alternative mitigation for the 24 listed adult fish impacted by reducing summer spill. The “Four Governors’ Letter” of June 2003 did not advocate blindly following the 199 actions in the BiOp at any cost. Rather, it embraced a comprehensive “All-H” (habitat, harvest, hatcheries, hydro) approach to salmon recovery and urged the federal government to take positive, measurable and cost-effective steps to benefit fish. Recent evaluations by the federal agencies show that similar or greater survival standards for juvenile salmonids can be met more effectively through alternate mitigation measures and are consistent with the Governors’ statement.

4. WDFW asserts that the hydropower policy goal of WDFW is to achieve no net impact for each salmonid species affected by hydropower projects.

Yes, this is precisely what the federal agencies are considering. They intend to mitigate – or more than fully mitigate – for any adverse effects resulting from reductions in summer spill. This clearly meets the WDFW policy of “no net impact”.

Moreover, Dr. Koenings refers to the hydropower policy defined in the *Washington Statewide Strategy to Recover Salmon* (Statewide Strategy), issued by the Governor’s Office of Salmon Recovery (Governor’s Office) in 1999. The Governor’s Office offers a hydropower policy goal to achieve no net impact for each salmonid species affected by hydropower projects. But the Governors Office also asserts that its first objective for salmon recovery is to develop a balance between salmon recovery and a healthy economy. The policy reads as follows:

Develop and implement a coordinated and balanced statewide strategy that moves aggressively toward the goal while maintaining a healthy economy.

The Governor's Office also acknowledges funds for salmon recovery will always be limited and decisions must be made to put them to the best use. In the section titled *Setting Priorities*, the Governor's Office says that

Given the nature and extent of the problems faced by Washington's salmon, the need for funding and other resources will always be greater than what's available. Decisions must and will be made to allocate available resources to specific activities and areas over time.

Summer spill is the most expensive mitigation measure implemented by the Action Agencies. The alternate mitigation strategies are scientifically supportable and will move toward balancing salmon mitigation with responsible economic management.

5. WDFW asserts that curtailment of summer spill will increase the downstream passage mortality for large numbers of Washington origin fish.

We do not agree. According to the Corps, in any given year over 90% of the ESA listed Snake River fall chinook are safely collected and barged from the river. The abundant non-ESA listed fall chinook from the Hanford Reach are barged at a rate of about 50%. Therefore summer spill provides a minimal benefit to both ESA-listed and non-listed salmonids at a large cost to the region.

As for the few fish that remain in the river, the actual increase in mortality is minimal. NOAA-F estimated the rate of survival for various routes of passage when it developed recommended river operations in the BiOp. Survival through the other passage routes through dams is very nearly as high as through spill in most cases. For instance, as shown in the agencies' impact analysis, survival of juvenile salmonids passing spillways is estimated at 98%; for bypass systems, 98%; and for turbine passage 90% - 94%. The current strategy in the BiOp is to achieve specified biological performance standards for fish listed for protection under the ESA.

Primary among Dr. Koenings' concerns is the mortality of Washington origin salmonids. Yet the vast majority of these fish are not listed under the Endangered Species Act, so his other concerns about the 2000 BiOp's requirements do not apply to these stocks. Regardless, the estimated increase in mortality is minimal and the biological offsets being considered will provide the needed benefit to ensure equal or greater benefit than summer spill.

6. WDFW asserts that offset actions are inadequate.

We disagree with WDFW's statement that the proposed offsets "offer very little real value." The offset actions to replace summer spill were developed cooperatively by representatives of federal and state fish managers, tribes, the Council staff and

utilities. Recent analysis shows that these offsets can provide an equal or greater benefit to all fish stocks adversely affected by the elimination of summer spill. The two offsets being primarily considered, increased Northern pikeminnow management and Hanford Reach Anti-Stranding operations, were developed by the federal and state fish managers who now criticize their effectiveness.

These and all of the proposed offsets are described more fully in Section D below.

ADDITIONAL SUPPORT FOR ALTERNATIVES TO SUMMER SPILL

A. The Biological Opinion includes flexibility in actions to meet the performance standards.

There is misunderstanding about the difference between the so-called “aggressive non-breach” alternative used in the Corps’ environmental analysis on the Snake River projects and what the region is currently implementing in the BiOp. 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 make it necessary for there to be flexibility in 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.

The flexibility provided by NOAA-F in the BiOp is particularly relevant to the use of spill to pass the only 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 clearly shows that there are extremely small biological benefits for the Snake River fall chinook from summer spill.

B. The federal agencies are using the best science available.

The federal agencies used a “simulated passage” model (SIMPAS) developed by NOAA-F in the late 1990s to assess the effects of spill reductions on salmon stocks in the Columbia River. SIMPAS produces an estimate of the difference in survival of a population of juvenile salmonids as they pass through different routes through a dam. The model was designed to allow policy makers to evaluate the relative biological benefits of alternative strategies for improving salmon and steelhead survivals through the hydropower system.

The SIMPAS model was the basis of the NOAA-F fish survival estimates that supported its recommended operations in the 2000 BiOp. SIMPAS has been used many times since then to evaluate the consequences of proposed operational changes. Thus SIMPAS is recognized as the best available tool for this type of analysis.

To quantify the number of adults produced by various operational scenarios, a ratio of smolt to adult return rate (SAR) is applied to SIMPAS results. The federal agencies decided to look at SARs of 0.5 to 4%. Therefore the model can provide a range of adult numbers from the exact same number of juveniles estimated by SIMPAS. For clarity, the region uses a mid-range SAR of 2%, resulting in a benefit of the summer spill program of 19,000 non-listed adult fall chinook salmon. While altering the assumption to a 4% SAR in the same model would result in a doubling of the number of adult fish assumed to be helped by summer spill, it would also have the effect of enlarging the entire population returning. The federal agencies estimated the total returning fall chinook number to be 384,000.

In addition, the recent federal agencies’ analysis is the most comprehensive and detailed yet conducted on the biological benefits and economic considerations of spilling water at federal dams on the Columbia and Snake Rivers during July and August. In this analysis, the federal agencies expanded the SIMPAS model to address all major fish stocks migrating during the summer months, in addition to the Snake River fall chinook.

C. Reductions in summer spill have very minimal impacts.

The expanded analysis clearly shows that the primary beneficiary of the summer spill operation is the abundant and non-ESA listed Hanford Reach fall chinook. Indeed, this analysis shows that the use of summer spill as a measure to improve Snake River fall chinook survival is particularly ineffective and inefficient.

Specifically, the federal agencies' analysis estimated that the elimination of summer spill would result in a loss of approximately 24 adult Snake River fall chinook from a returning run that was close to 12,000 fish over Lower Granite Dam last year. Elimination of summer spill would also reduce the estimated fall chinook run of 384,000 adult fish by about 19,000 fish, or less than 5%. On the other hand, these non-ESA listed salmon are subject to a 50% harvest.

Finally, the current summer spill strategy costs the federal system approximately 3,000 megawatt-months of generation, or \$77 million annually. When this figure is calculated to a per-fish cost, each ESA listed fish costs the Northwest more than \$3 million and each non-listed fish more than \$4,000.

D. The proposed offset strategies are valid and would work.

How were the offset proposals created? An *ad hoc* group composed of representatives from NOAA-F, BPA, Corps, the Council, U.S. Fish and Wildlife Service, WDFW, ODFW, university researchers, tribes and utility interests worked cooperatively to identify alternate mitigation strategies (offset measures). The intent was to mitigate for any increase in mortality that may occur as a result of reducing or eliminating summer spill.

This committee developed a series of principles to guide its deliberations. Briefly, these principles say that offsets should be cost effective, measurable, address all affected stocks, provide an equal or greater survival benefit to affected stocks, and apply to both ESA-listed *and* non-ESA listed stocks of salmon and steelhead.

The committee considered a wide variety of offsets such as increased flow augmentation, increased spill at certain dams, installation of structures at dams to provide a safer route of passage, increased control of avian and fish predators, increased production of hatchery fish, improvements to critical habitat, increased law enforcement and reductions of harvest through purchase of excess commercial harvest capacity. To demonstrate further the thoroughness of these discussions, the committee even discussed *dam drawdown and dam breaching*.

In summary, this *ad hoc* group of representatives from fish managers to utility interests worked cooperatively to develop sound and scientifically supportable

alternate mitigation options. Unfortunately, now some fish management agencies are declining to support the biological offsets identified through this process.

Offset Action 1 – Northern Pikeminnow Management Program Heavy-Up

WDFW asserts that the offset may provide some benefit if it is expanded in the lower river, but is negligible as currently drafted.

This is a proven program that can be enhanced further. Staff with the Oregon Department of Fish and Wildlife (ODFW) contracted with BPA to study the effects of Northern pikeminnow predation on outmigrating juvenile salmonids. The estimated mortality was so significant that BPA funds an annual program that pays a bounty to anglers that catch Northern pikeminnow. Both the ODFW and WDFW staff sites along the Columbia and Snake Rivers to register anglers and record their catch each day. Since inception, over two million pikeminnow have been removed from the basin with an estimated reduction of juvenile salmonid mortality of 25%. As a result, an estimated four million more juvenile salmonids survive to the ocean each year.

What's new in the offsets proposal? Currently, anglers are allowed to fish in waters only open to the public. Yet there are significant predator populations located in the immediate vicinity of the dams within the Boat Restricted Zones (BRZs). We propose that the federal agencies implement a more site-specific removal program in the BRZs. Notably, when juvenile salmonids pass a dam, either through a spillway, turbine or juvenile bypass system, they are typically exposed to significant turbulence. As a result, they are more likely to be disoriented within the BRZ and therefore more prone to be eaten. Removing predators in the BRZ will likely have a more significant benefit to the survival to juvenile salmonids than removing predators in the open water between the dams.

Offset Action 2 – Smallmouth Bass Control

WDFW asserts that removing smallmouth bass is not an efficient way to increase survival of juvenile salmonids.

Studies prove otherwise. Recent research by the Corps identified very large populations of smallmouth bass associated with dams, especially The Dalles Dam. A recent turbine survival study was cut short because test fish were being eaten by predatory fish before they could be retrieved. Additionally, smallmouth bass populations are dramatically increasing above the Lower Snake River dams.

Interestingly, in the Washington Statewide Strategy, the Governor's Office said that:

Non-indigenous predatory fishes such as walleye, smallmouth bass and channel catfish, and native species such as northern pikeminnow (squawfish), have been found to consume significant numbers of juvenile salmonids.

The ODFW and WDFW sell a large and ever increasing number of licenses to anglers who primarily target warm- and cool-water species. There is a constituency that targets smallmouth bass for recreation. Thus it is logical that these agencies would not support reducing smallmouth populations as an offset to summer spill.

Although implementing a bounty program or increasing the bag rate for smallmouth bass is unlikely, we support site specific removal of smallmouth from the BRZs around each dam to reduce predation on juvenile salmonids.

Additionally, smallmouth populations can be further controlled in other areas of high predation by varying the reservoir elevation during the spring. Drafting the reservoirs for a short interval in the spring would disrupt the reproductive success of smallmouth bass, thereby further reducing the population. This operation may also affect other non-native predatory species.

Offset Action 3 – Commercial Harvest Reduction

WDFW asserts that this offset is unrealistic, inappropriate and inconsistent with the Northwest Power Act.

No one suggests that tribal harvest be reduced to offset the elimination of summer spill. The fish managers' continual reference to tribal fisheries in this regard serves only to confuse and make the issue more contentious. Only the SE Alaska commercial troll fishery has been considered as an offset measure for two specific reasons. First, part of its catch is fall chinook from the Mid-Columbia River. Second, due to a variety of factors, the market for its fish is depressed. The proposal considered by the federal agencies was to buy fishing capacity from fishermen on a voluntary basis. At no time has anyone urged that this fishery be unilaterally reduced or eliminated.

Limiting the non-tribal commercial gill net fishery in the lower Columbia River can also be an effective strategy. Currently, the states and tribes evenly split the harvestable surplus of fish returning to the Columbia River. Of the non-tribal portion of the fall chinook harvest, about 40% is allocated to the non-tribal commercial fishermen and 60% to sport fishermen. According to the Northwest Sportfishing Industry Alliance, sport fishery in the Columbia River provides a significant economic benefit to the region, especially in fishing dependent communities.

Conversely, the non-tribal commercial fishery is inefficient and provides little economic benefit. There is a significant mortality of non-target fish in the commercial fishery,

including significant numbers of ESA listed salmon and steelhead stocks. When using a gill net to catch fall chinook, significant numbers of other non-target species are caught and killed. By reducing the non-tribal commercial fishery, the impact to non-target ESA listed fish is reduced. Hence more fish can be allocated to the sport fishery and more fish can be allowed to continue upstream to reproduce and further build populations for the future.

Offset Action 4 – Avian Predation Research

WDFW asserts that this offset would provide little or no value.

While the federal agency representatives may be unable to implement this offset measure until 2005, the offset as proposed would reduce the number of Caspian terns in the lower estuary by 2,500 to 4,500 pairs. This reduction would result in an estimated additional 350,000 to 500,000 juvenile salmonids surviving to the ocean each year. This measure has a proven record. Even under the restrictions imposed by the court under the Migratory Bird Treaty Act, relocation of terns from Rice Island to East Sand Island reduced predation mortality by 50%, saving four to eight million smolts per year.

Offset Action 5 – Pile Dike Removal

WDFW asserts that this offset would provide little or no value.

Removing pile dikes in the Columbia River estuary would reduce opportunities for cormorant perching and associated foraging for juvenile salmonids, reduce fish predator habitat, restore natural flow velocities, and potentially improve forage and habitat conditions in the immediate location of the removed pile dikes. It is a biologically sound goal to allow natural habitat forming processes to proceed unimpeded.

Offset Action 6 - Anti-Stranding Flow Fluctuations Limits in the Hanford Reach.

WDFW asserts that the program is not a valid offset because the program is already authorized.

This is untrue. First, BPA has not yet agreed to this measure and has no obligation to pursue it. For a future obligation to be conferred upon BPA as a result of past cooperation is a classic example of a good deed taken for granted. If BPA's participation creates mitigation benefits, it should receive corresponding credit.

The voluntary provision of flow fluctuation limits in the past does not establish a future requirement. Even if one accepts that invalid premise, Grant will be providing up to 7.7 million smolts in the future from its hatchery – far exceeding its current requirements. The excess smolts provided will specifically be for mitigation of unavoidable mortalities

related to the impacts of flow fluctuation. The combined effect of additional hatchery production and the proposed river operations program during the rearing period more than mitigate for the expected loss of juvenile fish from stranding.

In the Washington Statewide Strategy, the Governor's Office says that it will use "...*collaborative, incentive-based approaches to recover salmon*". Grant, working cooperatively with the other mid-Columbia PUDs, the Corps, BPA, the BuRec, WDFW and tribes developed an operation to reduce river fluctuations in the spring and therefore afford significant protection to juvenile fall chinook salmon rearing in the Hanford Reach. While Grant's Priest Rapids Project is immediately upstream of the Hanford Reach, reducing river fluctuations in that area requires cooperation of all the hydroelectric project operators upstream. The Hanford Reach Fall Chinook Protection Program, a new agreement likely to be ratified this week, officially expands the successful Vernita Bar Agreement to include measures to reduce flow fluctuations during the post-emergence rearing period of fall Chinook fry that have been voluntary up to this point. With this agreement, mid-Columbia River hydroelectric project operators are once again demonstrating a commitment to "follow the science." Not to allow some credit to BPA for voluntarily entering into an operation that will save a significant number of a salmon stock that is important to the state of Washington is a direct rebuke of the cooperative, incentive-based approach declared to be a goal in the Washington Statewide Strategy.

No party questions the biological benefit provided here. The program could result in long-term, legally binding obligations for protection of rearing fall chinook and with added protection relative to anything done in the past. For these reasons, the proposed program is a valid offset to be credited against the elimination of summer spill.

CONCLUSION

In their presentation dated February 11, 2004, the federal agency representatives thoroughly document the limited biological benefits of the summer spill program. They outlined the obvious economic cost to this operation. And, they outlined a responsible set of alternatives to summer spill that can bring back more fish at a much-reduced cost to the region. We find the available information argues against the policy positions in Dr. Koenings' letter of February 20, 2004. Indeed, the evidence supports immediately putting into place offset measures and curtailing the summer spill operation this year.

BPA Public Involvement

From: jandl.nelson@verizon.net
Sent: Wednesday, March 31, 2004 8:17 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 Nelson
private citizen
jandl.nelson@verizon.net

20039 Wallingford Ave N
Shoreline WA 98133

No, no, NO! It's time we, as a nation, become true stewards of all under our jurisdiction and control. We need to do better in protecting our environment and the species living therein. Let's do what we've already agreed to do: protect the fish, the environment and stand by our legally binding agreements concerning water flows. This proposal has "California first" written all over it. I say "NO!".

BPA Public Involvement

From: julsund@jcpenny.com
Sent: Thursday, April 08, 2004 15:58
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>

Jerry Ulsund

julsund@jcpenny.com
541 296 4978
260 Lone Pine Lane #7
The Dalles OR 97058

I am strongly in favor of reducing the summer spill. As I see it the economic factors both in the short and long run clearly point to the need to use the water for the benefit of the whole area and it's citizens. There are currently numerous programs that will continue to help the salmon but the need for less expensive energy will be helping people meet basic needs such as winter heating through reduced power rates. Thank you.

BPA Public Involvement

From: Jean McKinney [jmckinney@gorge.net]
Sent: Saturday, April 10, 2004 10:29 AM
To: comment@bpa.gov; cathyw@wascoelectric.com
Subject: Support of BPA Summer Spill Proposal

What defines success? This year a record number of Chinook passed Bonneville Dam exceeding the 10 year average by 230%. The return of Steelhead and Coho also exceeded the 10 year average.

How much longer must we spend millions of dollars for the current Summer Spill Program? This program cost ratepayers 77 million per year. Federal agencies such as NOAA and USACE have indicated several times that there might be a more cost-effective program!

We want to continue be successful in balancing the needs of fish and our power needs, but we should consider programs that are considerate of fish and people.

The BPA Summer Spill Proposal will be a step in the right direction.

Jean McKinney
Board Member
Wasco Electric Cooperative

BPA Public Involvement

From: jvaneatonpw1@mashell.com
Sent: Wednesday, April 07, 2004 4:08 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>

Jamieson Van Eaton
Town of Eatonville
jvaneatonpw1@mashell.com
253-720-6192
201 Center St. W
Eatonville WA 98328

The Town of Eatonville, a customer of BPA, is vitally interested in receiving least cost reliable power, and as such, supports in every manner, the ongoing efforts of BPA to provide for low-cost environmental mitigation.

BPA Public Involvement

From: frasier@gorge.net
Sent: Friday, April 09, 2004 11:00 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>

Ivan

frasier@gorge.net

2304 East 14th Street
The Dalles OR 97058

I don't see the "Summer Spill" item to comment about. My comment to that is that the modification is a step in the right direction. Thank you.

BPA Public Involvement

From: irishtv@email.com
Sent: Thursday, April 15, 2004 9:14 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>

Galen

none

irishtv@email.com

509-884-7246

858 N. Valley Mall Parkway

East Wenatchee wa 98802

Iam in favor of not having a summer spill just to a few fish. Some of the money earned from power sold during that time could used for better research for saving the fish. Thanks Galen Eggers

BPA Public Involvement

From: vadasrlv@dfw.wa.gov
Sent: Wednesday, March 31, 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>

Dr. Robert L. Vadas, Jr.

Personal statement

vadasrlv@dfw.wa.gov

(360) 705-2231

517 11th Ave. SE, Apt. #41

Olympia WA 98501-2370

As a fisheries scientist who has provided Columbia River analyses to the National Academy of Sciences, I find it disconcerting that newspaper articles often suggest that reduced summer spills won't impact salmonids because most smolts outmigrate towards the ocean during spring. But the river historically had decent summer flows that allowed important runs (e.g., chinook) to thrive. With the dams in place, we need to provide spring/summer spills so that various salmonid runs have adequate flow to bypass dangerous turbines and fish predators, the latter of which hang out near dams to better pick off disoriented smolts. My own analysis revealed the strong relation of juvenile chinook survival to lower Snake River flows, albeit the relation was curvilinear rather than a simple straight line. That is, intermediate flows of 100-115 kcfs are needed to protect smolt outmigrations; lesser flows have yielded much-reduced survival in the past three decades. So smolt survival was good throughout the 1990s because of the consistent federally mandated spills then. Lesser spills will impact these fishes and thus the commercial and sport fishers that collectively contribute much to our state's economy.

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Monday, April 12, 2004 14:10
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>

Donald F. Dunn
Dunn, Toole & Carter, LLP
No E-mail Address Submitted
541-296-5424

The Dalles OR 97058

The three year spill adjustment proposal will save about \$40 million per year, and the savings from 2004 and 2005 would 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 contxt 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 about 88,662 returning adults. These runs exceed 384,000 fish and they are harvested in a river at over 32%, about 123,000 fish. This proposal is a step in the right direction

BPA Public Involvement

From: AnonymousComment@somewhere.com
Sent: Monday, April 12, 2004 2:10 PM
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>

Donald F. Dunn
Dunn, Toole & Carter, LLP
No E-mail Address Submitted
541-296-5424

The Dalles OR 97058

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BPA Public Involvement

From: Cheney, Katherine - KEWS-4
Sent: Monday, April 12, 2004 12:02
To: Kuehn, Ginny - DM-7; Stenehjem, Carlene - DM-7
Subject: FW: BPA Columbia River Plans

[not sure if this one made it to you or not yet.....thanks!](#)

-----Original Message-----

From: Merchant, Adele R NWD [mailto:Adele.R.Merchant@nwd01.usace.army.mil]
Sent: Monday, April 12, 2004 8:04 AM
To: Cheney, Katherine - KEWS-4; Lane, Dominic P - PG-5
Subject: FW: BPA Columbia River Plans

[Katherine/Nick:](#)

[I wasn't sure how to get this message to the appropriate place, so I thought I would send it to you to in hopes you can forward it for me. It's a comment on summer spill. Thanks,](#)

[Adele 503-808-3722](#)

-----Original Message-----

From: Perkins, Homer H NWD
Sent: Sunday, April 11, 2004 5:48 PM
To: Merchant, Adele R NWD
Subject: FW: BPA Columbia River Plans

-----Original Message-----

From: Diane Bagués [mailto:dbagues@earthlink.net]
Sent: Wednesday, April 07, 2004 3:33 PM
To: homer.h.perkins@usace.army.mil
Subject: BPA Columbia River Plans

Dear Mr. Perkins,

This is an email follow-up to the conversation we had last week. You gave me your email address and told me you would forward my message to appropriate parties.

I find it unconscionable, and a dereliction of duty, for the Army Corps of Engineers to allow the BPA plans for halting spills over the Columbia River dams to go forward. The Corps is charged with protecting both the river's endangered species and the ecosystem upon which they--and we--all depend. The BPA plans are focused on making money at the expense of the fish, and consequently other species and the entire ecosystem as well. In turning the river into an even warmer series of lakes, the plan is detrimental to water quality and species dependent on the river as well. It is particularly reprehensible that birds will be harassed and killed to compensate for the fish killed by the dams.

The Corps should have brought a halt to the BPA plan long ago, and it must do so now if it is to fulfill its obligations under the Endangered Species Act.

Sincerely,
Diane Bagues

4/16/2004

2013 S.E. Waldron Road
Milwaukie, Oregon 97222
503.794.0997
dbagues@earthlink.net

BPA Public Involvement

From: manchu1@arczip.com
Sent: Wednesday, March 31, 2004 8:45 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>

David Schuchardt
Citizen of the United States
manchu1@arczip.com
206.285.8123
2555 27th Ave W
s wa 98199

The proposed spill and mitigation package will kill Fall Chinook Salmon, a listed endangered species. The proposal estimates up to 20 returning adults will be killed, while the mitigation (which is minimal and uncertain) will at best increase survival by 11 adults. This is a net take and is illegal. More significantly, the mitigation package has extremely modest costs and really represents best management practices that should already be in place!!! Why are these cost-effective measures not already being implemented as part of the existing management strategy? Have the Corps and BPA knowingly mismanaged the river system, in order to "reserve" these simple measures as future mitigation for take proposals? Please explain why these measures are not already part of the existing river management plans. As new, cost-effective management strategies that increase survival are identified in the future, does the Corps and BPA plan to withhold them and use them as offsets against further take proposals? If so, how can the river system ever be improved? Such an approach amounts to ongoing degradation of a public natural resource to subsidize BPA.

BPA Public Involvement

From: dtate@wrec2.com
Sent: Wednesday, April 07, 2004 9:26 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>

Darcy Tate
Wells Rural Electric
dtate@wrec2.com
775 752 3328
P.O. Box 365
Wells Nv 889835

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: dldocherty@bpa.gov
Sent: Thursday, April 01, 2004 2:42 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>

Debbie Docherty
BPA
dldocherty@bpa.gov

The comment period on the summer spill proposal is not long enough. Why is there such a short comment period for this?

BPA Public Involvement

From: chuckb@okpud.org
Sent: Wednesday, April 07, 2004 11:16 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>

Chuck Berrie
Public Utility District of Okanogan County
chuckb@okpud.org
509-422-8485
P.O. Box 912
Okanogan WA 98840

Okanogan County Public Utility District strongly supports healthy sustainable salmon populations throughout the Columbia River system and its tributaries. Further, Okanogan County Public Utility District is very aware and sensitive to the impacts electric rates have on our customers and the economic climate in our County. Rate relief and salmon are both very important. We support efforts that are based on sound science that will provide equal or more biological benefits and reduce the cost associated with the benefits. It is very important to review current practices to discover and implement more cost effective programs. The proposal to reduce summer spill when it is least effective, while providing additional measures (offsets) that would be as beneficial at a lower overall cost, would be a step in the right direction. Chuck Berrie Assistant Manager Okanogan Public Utility District

BPA Public Involvement

From: dawsey@bentonrea.org
Sent: Wednesday, April 07, 2004 10:48 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>

Charles Dawsey
Benton REA
dawsey@bentonrea.org
509-786-2913
P.O. Box 1150
Prosser WA 99350

April 7, 2004 Comments Regarding Summer Spill Given the significant Bonneville Power Administration (BPA) wholesale rate increases that have been imposed on customers within the region during the last few years it is imperative that all reasonable avenues be investigated to reduce power costs. The modifications being proposed to the summer spill are certainly reasonable and common sense approaches to aid in reduction of power costs. To suggest that forgoing the financial value estimated at \$40 million that could be received by modifying the summer spill, to potentially avoid affecting 2 to 20 Snake River Fall Chinook is a ridiculous proposition. It becomes even more absurd when taken in context that the total number of returning Snake River Fall Chinook is 2,420. I wholeheartedly support the efforts of the BPA, Corp of Engineers, and NOAA Fisheries in the modifications to the summer spill as proposed. It is for the first time in some years that we see some application of "good ole common sense"-a step in the right direction!!!. Sincerely Yours, Charles L. Dawsey

BPA Public Involvement

From: aghoug@msn.com
Sent: Wednesday, April 07, 2004 08:10
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>

Arnie Houg
Alcoa Intalco Works
aghoug@msn.com
360-354-3580
509 Palmer Ct
Lynden wa 98264

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, Arnie Houg

BPA Public Involvement

From: almoffitt@hotmail.com
Sent: Wednesday, April 07, 2004 9:23 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>

Amanda Moffitt
Wells Rural Electric Co.
almoffitt@hotmail.com
7757522311
305 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: ahess@wrec2.com
Sent: Wednesday, April 07, 2004 09:47
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>

Allen Hess
Wrec
ahess@wrec2.com
775-752-3328
1451 Humbolt Av.
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: adormaier@iglide.net
Sent: Thursday, April 08, 2004 11:37
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>

Allen Dormaier
Member Inland Power and Light
adormaier@iglide.net
509233859
45122 Lakeshore Homes Road
Loon Lake WA 99148

4-7-04 Dear Federal Official: I am a rate payer and am concerned about the practice of spilling water over federal dams in July and August. I support trying to be concerned about preservation of our salmon but all the reports I can find indicate that the practice of spilling water is very expensive to farmers and rate payers for the relatively fish that are saved. I am in favor of the proposed reduction of spillage and feel it definitely needs to be tried for the three year period as proposed. Sincerely, Allen Dormaier
Concerned Inland Power & Light Co. Member