

Fisheries Division  
P.O. Box 200701  
Helena, MT 59620-0701  
(406) 444-2449  
Fax: 406-444-4952  
October 6, 2006

Mark Walker  
Director of Public Affairs  
Northwest Power & Conservation Council  
851 SW 6th Avenue, Suite 1100  
Portland, Oregon 97204-1348

Dear Mr. Walker:

Montana Fish, Wildlife & Parks (MFWP) would like to thank the Council for forwarding our projects to BPA for funding in 2007 through 2009. MFWP and our partner agencies have a long history of successful mitigation projects that are incrementally offsetting fisheries losses caused by Hungry Horse and Libby Dams. We will continue to do an effective job during the period covered by the coming rate case.

MFWP would like to comment on NPCC's recommended budget reduction on the Confederated Salish and Kootenai Tribe's (CSKT) ongoing project 199101901, Hungry Horse Mitigation/Flathead Lake. CSKT project 199101901 is one of the six projects that received the highest scores resulting from the Mountain Columbia project review process, and is integral to our cooperative effort with CSKT to mitigate the impacts of Hungry Horse Dam. CSKT's project is focused on the Flathead Indian Reservation, and compliments actions by MFWP's Hungry Horse Mitigation Program throughout the remainder of the Flathead watershed. CSKT's project 199101901 also assists MFWP in monitoring Flathead Lake, both on and off of the Reservation. Habitat restoration projects implemented by project 199101901 include actions on lands within the reservation and on Tribal lands that will be acquired under our jointly submitted, Secure and Restore project (200200300). Habitat restoration projects planned for the 07-09 period will not be implemented if CSKT project 199101901 is not fully funded. These include 1) contouring roads to restore Seepay Creek, 2) removal of a passage barrier in Magpie Creek, 3) channel reconstruction in Ronan Creek, and 4) unforeseen restoration needs on lands acquired by the Secure and Restore project. As a result, state and tribal mitigation efforts will suffer if project 199101901 is not restored to full funding as recommended by the Provincial Oversight Group.

We strongly encourage the NPCC to remain consistent with the Mountain Columbia Oversight Group and reconsider their budget recommendation for FY07 and FY08 for project 199101901. The recommended budget reductions on project 199101901 appear to redirect funding to the completion of subbasin plans in the Bitterroot and Blackfoot drainages. Although the oversight group supported the concept of developing plans for these remaining subbasins, the proposals did not meet our "gatekeeper" criteria, due to the fact that there are no Federal hydropower impacts in the Blackfoot or Bitterroot drainages. We question the diversion of implementation dollars from an ongoing project to fund the development of subbasin plans in offsite watersheds.

Project 200717500 would develop simple, DNA-based tests to help fisheries managers differentiate native redband rainbow trout from coastal and hatchery varieties. DNA-based tests do not require fish be sacrificed, only a fin clip preserved in ethanol is needed. Washington State University (WSU) conducted preliminary research with funding from the Montana Fish, Wildlife & Parks' Libby Mitigation Program (Project 199500400). This preliminary project sought to identify DNA tests for the inland and coastal forms of two allozyme loci that have historically been used to detect hybridization. Results of the preliminary project were encouraging and suggest that if project 200717500 is funded at \$276,000.00, additional markers can be rapidly identified to improve the level of confidence in interpreting the level of hybridization within populations.

We would also like to comment on project 200725600 that was reviewed by the mainstem review team. This is an innovative proposal to use turbulent flow to guide fish past obstructions. The proposal would conduct fish guidance experiments using a Flow Velocity Enhancement System (FVES) that creates a large turbulent flow field. The ISRP gave the project a favorable review, but the Mainstem review group scored the proposal as a "recommended action" which typically receives no funding. The proposal provides an innovative solution to fish passage that requires less water to guide fish. The FVES was previously tested in net pens off Astoria and demonstrated fish guidance inside large net pens. Recently the device was tested in Riffe Lake on wild, free-ranging fish and the device showed fish guidance during intermittent "on and off" tests. Dr. Chuck Coutant (former ISRP/ISAB member) wrote an informational document on the positive results. The next test should attempt to guide fish from one eductor to another in an array to determine if fish can be guided from one device to the next. An array of three or four FVES eductors should be arranged in a "J" configuration to guide fish in an arc toward a specified destination such as a surface collector, bypass facility or individual spill gate. The test should be performed as part of another ongoing project that tracks marked fish, so that the influence of FVES can be evaluated. If fish can be guided effectively, as indicated by earlier tests, fish migrations could be enhanced with less flow augmentation or spill. This device could pay for itself by increasing power revenue at Columbia River dams (and thus generate more funding for fisheries mitigation basin wide). The proposal should be funded as an innovative project.

Thank you for your time and consideration. Please don't hesitate to call Brian Marotz at 406-751-4546, if you have any questions.

Respectfully,

Chris Hunter  
Chief of Fisheries