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From: Robin Steinkraus [mailto: [REDACTED]]  
Sent: Friday, February 07, 2003 5:33 PM  
To: Mark Walker, NWPPC  
Subject: Document 2002-16, Draft Mainstem Amendments

Flathead Lakers  
PO Box 70  
Polson, MT 59860

February 7, 2003

Mark Walker, Director of Public Affairs  
Northwest Power Planning Council  
851 SW 6th Ave., Suite 1100  
Portland, OR 97204

Re: Draft Amendments to the Columbia River Basin Fish & Wildlife Program, Council  
Document 2002-16

Dear Mr. Walker:

The Flathead Lakers is a nonprofit, grassroots organization working for clean water, healthy ecosystems and lasting quality of life in the Flathead Watershed of Northwest Montana. The organization was founded in 1958 and currently has over 1,000 members. Membership is open to anyone who is concerned with protecting and improving the environment of Flathead Lake and the Flathead Watershed. Flathead Lakers members own land on Flathead Lake and throughout the watershed, and use and enjoy the lake and its tributaries for fishing, boating and other forms of recreation. Flathead Lake provides significant recreational, scenic and economic benefits to the Flathead Basin and State of Montana as well as being a major natural feature in a unique ecosystem.

The Flathead Lakers has a direct interest in the fisheries of the Flathead Watershed and in sustaining native species. The presence of native fish populations in the Flathead is part of what makes this area special. Native fish are part of the area's natural and cultural heritage. It is important to preserve native fish populations in Flathead Lake and the Flathead River system.

The Flathead Lakers are pleased to see federal agencies taking a broader look at basin-wide impacts, including giving more attention to headwaters areas such as the Flathead River. The Flathead Lakers support the Northwest Power Planning Council's efforts to balance the requirements for resident fish in the upper basins of the Columbia River system with the needs of anadromous fish in the Columbia River. Although the best possible balance is difficult to

determine, the needs of the upper basins should not be sacrificed in the attempt to restore downstream fisheries.

The Flathead Lakers also support the implementation of VARQ for Hungry Horse Dam because of its benefits to threatened fish species in the Flathead Basin, attempts to create a more natural flow regime in the Flathead River, and improving the probability of refill of Flathead Lake during droughts by moving releases from Hungry Horse from winter to the spring refill period. A high priority should be given to filling headwaters storage reservoirs in the spring. The Flathead Lakers also support incorporating a sliding scale for the date of required refill of Hungry Horse Dam. A sliding refill date based on reservoir inflow forecasts will reduce the potential for uncontrolled spill and fisheries impacts downstream. Spreading flow augmentation for salmon out over the summer months rather than releasing sudden, short-term flows in August will also benefit Flathead River fisheries and avoid the unnatural late summer peak in flows in the Flathead River.

We encourage the NWPPC to examine opportunities for increased coordination between Hungry Horse Dam and Kerr Dam, currently owned and operated by PPL Montana. The Bureau of Indian Affairs (BIA) is in the process of preparing an Environmental Impact Statement on a drought management plan for Flathead Lake and Kerr Dam. A drought management plan is required by the Kerr Dam license issued by the Federal Energy Regulatory Commission. The Flathead Lakers have strongly encouraged the BIA to conduct a thorough environmental and economic impact analysis of various drought management strategies including improving coordination between Hungry Horse and Kerr Dam management. Just as the headwaters rivers and the mainstem Columbia River cannot be managed in isolation from one another, the upper and lower portions of the Flathead River should be viewed as one system in order to maximize the ability to satisfy water needs during droughts, including Flathead Lake levels during the recreation season and flows in the Flathead River below Kerr Dam.

Thank you for the opportunity to comment.

Sincerely,

Robin Steinkraus  
Executive Director