

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

From: Shannon McDaniel [mailto:]

Sent: Thursday, February 06, 2003 12:41 PM

To: comments@nwppc.org

Subject: Comments on draft mainstem amendments, doc 2002-16

Please find attach comments submitted by the South Columbia Basin Irrigation District for Document 2002-16

<<Northwest Power Planning Council 2-6-03.doc>>

I have sent hard copy via mail.

Thank you,

Shannon McDaniel
Secretary/Manager
South Columbia Basin Irrigation District

(SEE BELOW FOR ATTACHMENT)

February 6, 2003

Northwest Power Planning Council
851 SW Sixth Avenue, Suite 1100
Portland, OR 97204-1348

Chairman Cassidy and Council Members:

The South Columbia Basin Irrigation District appreciates the opportunity to comment on the Draft Mainstem Amendments as outlined in the October 2002 Council document 2002-16. The District's perspective on this issue is based upon the continued need for water diversion for the intended agricultural, municipal, industrial, and wildlife benefits of the Columbia Basin Project, and the present and future landowners and water users of the District depending on the water resources of the Columbia River at Grand Coulee Dam.

The District is appreciative of the Council's efforts to realistically review the regulation of the Columbia River System in a way that considers both the needs of anadromous and resident fish, and the balance of maintaining a power system that is reliable and has the ability to sustain the economy of the Pacific Northwest. The District has gone on record on numerous occasions opposing regulation of the Columbia River for flow regimes that do not have factual scientific benefits.

The current operations of the Columbia River Hydro Power System, as defined in the 2000 FCRPS, though well intentioned, are not providing the best uses of water resources for anadromous and resident fish or hydropower. The small changes—and we emphasize *small*—that are proposed in flow patterns by the Mainstem Amendments, have the potential to make incremental improvements for biological and hydropower interests.

The wholesale use of large quantities of water for flow augmentation has not provided measurable benefit to listed anadromous fish or resident fish within the Columbia River drainage. If in fact measurable benefits could be shown, there would be no argument. The absence of science in this area is not for lack of study. The use of stored water for flow augmentation, besides wasting valuable hydropower resources, has unintended impacts on resident fish and the economies that have developed in areas where resident sport fisheries have been most affected.

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The District would like to make specific reference to page 21 of the Draft "Strategies in Specific Areas." The strategies are, at first glance, well thought out and would seem to provide the desired benefits to both anadromous and resident fish. However, the reintroduction of anadromous fish into blocked areas above Chief Joseph and Grand Coulee Dams would, in our opinion, create new flow and fish passage problems that would be beyond the financial capacity of the system, and would introduce an additional biological problem, which at this time would be an extreme waste of rate payers' financial resources.

The District urges the Council to continue with its efforts to balance the needs of the Northwest. The proposed amendments, while financially modest to BPA, are a start to a realistic approach to Columbia River flow management. Providing flexibility in reservoir control for resident fish and suggesting a more realistic approach to flow augmentation is an applauded step in Columbia River management.

Thank you, again, for the opportunity to comment.

Sincerely,

Mr. Shannon McDaniel
Secretary/Manager

SM:kgn