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From: Scott Bosse [mailto: [REDACTED]]

Sent: Tuesday, December 10, 2002 1:59 PM

To: comments@nwppc.org

Subject: Mainstem amendment comments

Dear Mr. Walker:

Please accept the attached comments on the draft mainstem amendment (Council document 2002-16) from the Greater Yellowstone Coalition. We have also mailed you a written copy of our comments.

Thank you,

Scott

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Scott Bosse
Rivers Conservation Coordinator
Greater Yellowstone Coalition

[REDACTED]
Bozeman, MT [REDACTED]

Ph: [REDACTED]

Fax: [REDACTED]

www.greateryellowstone.org

December 9, 2002

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

Dear Mr. Walker:

Thank you for the opportunity to comment on the proposed amendments to the Columbia River Basin Fish and Wildlife Plan. The following are the official comments of the Greater Yellowstone Coalition (GYC). The GYC is a Bozeman based non-profit conservation group dedicated to protecting the lands, waters, and wildlife of the Greater Yellowstone Ecosystem. Included in the upper Snake portion of the ecosystem are several rivers -- the Henrys Fork and South Fork Snake among them -- that are routinely manipulated in an attempt to mitigate for the impacts of the four lower Snake River dams.

I'd like to begin by reminding the Council why Congress passed the Northwest Power Act in 1980. It was because the operation of the Federal Columbia River Power System (FCRPS) was driving salmon and

steelhead, particularly those in the Snake basin, into extinction. The Act mandated for the first time that anadromous fish be given "equitable treatment" with other uses of the hydrosystem, namely hydroelectric production. One of the primary ways by which the Council was to accomplish this goal was to "provide flows of sufficient quantity and quality" in the mainstem Columbia and Snake rivers in order to improve juvenile salmon survival. We are greatly concerned that you are now proposing to scale back these very flows.

Twenty-three years after the passage of the Northwest Power Act, we believe the time is ripe to ask whether the Council has achieved its goals. If 2001 was any indication, I submit to you that the answer is a resounding no. There are some who say it is unfair to judge the Council's performance based on a severe drought year. I say that is precisely when the Council should be judged, when water is scarcest and decisions have the most profound implications. So what transpired in 2001? The outmigration of juvenile salmon and steelhead was the deadliest since Snake River salmon were listed under the Endangered Species Act in the early 1990s. The survival rate for in-river Snake River spring chinook smolts was just 26 percent, while the survival rate for Snake River steelhead smolts was a dismal 4 percent. To add insult to injury, the region suffered through chronic power blackouts and electricity prices, once the cheapest in the nation by far, soared to unprecedented heights.

Why was the juvenile salmon migration so deadly? The simple answer is because of record low flows in the mainstem Columbia and Snake Rivers. But the situation was likely made worse by the region's failure to provide flow augmentation water from Montana and Idaho reservoirs as required by the 2000 FCRPS Biological Opinion. Instead of being used to flush salmon smolts through the mainstem reservoirs, that water was used to spin turbines at the dams. That situation should have and would have been avoided had the Council diversified the region's energy portfolio with alternative power sources such as wind, solar, natural gas, and conservation. That is, if the Council had taken steps to ensure that the Northwest had a reliable, affordable power supply as Congress directed in 1980.

Today the Council has the audacity to propose abandoning the flow and spill targets set just two years ago in NMFS's 2000 Biological Opinion. I use the word "audacity" because these flow and spill targets were themselves compromise measures that were adopted after the Clinton Administration shied away from breaching the four lower Snake River dams even though the best available science showed it was the surest, and perhaps only, way to recover Snake River fish. The Council justifies this amendment by saying: 1) the science supporting flow and spill is inconclusive; 2) it will benefit resident fish; and 3) it will allow for more power generation, especially in winter.

The first justification - that there is no clear flow-survival relationship in the mainstem Columbia and Snake Rivers - is simply false. There is ample scientific evidence showing a strong, positive

correlation between outmigration flows and smolt-to-adult survival, especially in the Snake River (see June 14, 2001 Idaho Fish and Game comments). On a more anecdotal note, the premature death of 30,000 adult salmon in the Klamath River last summer illustrated quite graphically what happens to salmon when flows are insufficient.

The Council's second justification - that eliminating flow targets will benefit resident fish in places like the Kootenai River - may eventually prove true, but there is no hard scientific evidence to show that existing flow regimes are what are preventing bull trout, sturgeon, and burbot from recovering to historic levels. If the Council is sincere in its desire to restore native resident fish in headwaters areas, it would call for an end to power peaking at Libby, Dworshak, and other federal dams; the restoration of more natural hydrographs below these dams; and last, but not least, the removal of the four lower Snake River dams. The Council seems to have overlooked the fact that one of the major reasons why resident fish such as bull trout have declined so sharply in recent decades is because one their primary food sources - the eggs of anadromous fish - has largely disappeared. That, and the fact that historically productive rivers like the Salmon have gone sterile due to a lack of spawned-out salmon carcasses.

The Council's third justification - that abandoning flow and spill targets would allow for more hydroelectric production at the mainstem dams - is the only one that is remotely honest. Unfortunately, the proposed changes would result in only 41 additional megawatts of electricity, an amount that would have made virtually no difference during last year's energy crisis. The Council's argument that a portion of the additional \$8 to \$11 million generated at the dams would be used for fish restoration is utterly ridiculous. Essentially, what the Council is arguing is that it has to kill more fish to save more fish. In order to avert future salmon and energy disasters akin to the one that occurred in 2001, it is absolutely vital that the Council start looking at fish and wildlife costs as fixed, and energy costs as flexible, as opposed to the other way around. After all, BPA can always raise electricity prices to meet its Treasury payments. Fish have no such choice.

Other than providing more flexibility in power generation, I suspect the secondary reason why the Council is pushing this amendment is because Governor Martz and Governor Kempthorne are tired of seeing their states' recreational reservoirs drained before the Labor Day holiday. While the proposed changes in reservoir operations may please the Libby (Montana) and Orofino (Idaho) Chambers of Commerce, they will undoubtedly harm listed salmon and steelhead stocks by reducing flows at a time when they are needed most. The Council needs to ask itself which is more important - protecting the houseboating and bass fishing economies in headwaters reservoirs, or complying with existing laws and treaties?

In closing, we strongly urge the Council to reject the proposed amendment. It is wrong to trade salmon for power production, wrong to trade anadromous fish for resident fish, and wrong to keep the Northwest so dangerously reliant on hydropower. If the Council's goal in passing this amendment is to reduce or eliminate the need for flow augmentation, it should take a much more serious look at removing the four dams on the lower Snake River that are the root of the problem.

Sincerely,

Scott Bosse
Rivers Conservation Coordinator
Greater Yellowstone Coalition

[REDACTED]
Bozeman, MT. [REDACTED]

Ph: [REDACTED]

Email: [REDACTED]