



Electricity From Irrigation Water

GRAND COULEE PROJECT HYDROELECTRIC AUTHORITY

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January 24, 2003

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

Chairman Cassidy and Council Members:

Thank you for the opportunity to comment on Council document 2002-16, "Draft Mainstem Amendments to the Columbia River Basin Fish and Wildlife Program", October 2002.

The Grand Coulee Project Hydroelectric Authority was created by the East, Quincy, and South Columbia Basin irrigation districts. The Authority operates and maintains the hydroelectric generating facilities developed by the three districts on the Bureau of Reclamation's water conveyance system within the Columbia Basin Project.

The Authority views much of what is proposed by the Council in the Draft Mainstem Amendments as a good first step toward restoring balance to management of Columbia River water. In our view, the mainstem flow management policies of the past decade or so have followed a region wide blanket approach with little or no regard for site specific circumstances. A result of this monolithic approach has been the "no-net-loss" policy imposed by NOAA Fisheries. Such a restrictive measure may be appropriate and scientifically supportable at some locations but to apply this remedy to the entire region and especially to the entire Snake and Columbia mainstems is needlessly harsh.

The October 28, 2002 Northwest Power Planning Council letter inviting public comment on the draft mainstem amendments included request for comments on 12 specific issues. The Authority offers the following responses to several of the issues (Numeric reference coincides with numbered issue in letter for ease of reference):

1. Changes in storage reservoir operations, in general.

The Authority supports the Council's strategy to de-emphasize spring and summer flow targets and to focus more on maintaining stable upriver reservoir elevations and to make reservoir releases in a more steady pattern. The Authority agrees with the Council's goal that such reservoir operations will better balance the needs of anadromous and resident fish, reduce the discrimination against non-listed fish in favor of listed fish, better balance water needs between fish and hydropower and

reduce the costs (direct and foregone generation) being caused by flow augmentation.

2. **Changes in storage reservoir operations – alternative that preserves status quo operations while evaluations are pending.**

The Authority recommends that the status quo not be preserved and that the Council encourage expeditious implementation of the proposed changes in reservoir operations with provisions to adjust actions as experience is gained.

3. **Changes in storage reservoir operations – elimination of April 10 flood control elevation target.**

The Authority supports the filling schedule and minimum elevation targets proposed by the Council in the draft mainstem amendments.

4. **Changes in storage reservoir operations – summer flows.**

The Authority supports the Council's proposals in the draft mainstem amendments to de-emphasize spring and summer flow targets.

5. **Changes in storage reservoir operations – alternative that calls for allocating more water to meeting or exceeding Biological Opinion flow targets.**

The Authority does not support this alternative.

9. **Juvenile fish transportation.**

The Authority agrees that the "spread the risk" strategy of transporting some of the juvenile fish and leaving balance to migrate in river to be logical and prudent. This strategy should be periodically reviewed as improvements such as removable spillway weirs, surface bypass systems and turbine retrofits are implemented.

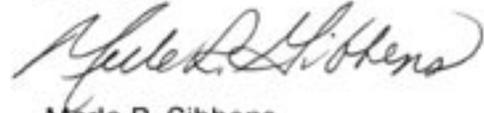
12. **Criteria and procedures for emergency operations.**

The Authority agrees that the Council should give some forethought to threshold criteria that would constitute a power emergency and to what mainstem actions should be taken during such an emergency. However, the Authority recommends that such pre-planning should be kept somewhat general and shouldn't be viewed as mandatory during the next emergency.

Each emergency, power or otherwise, tends to be somewhat unique and each emergency needs its own uniquely appropriate responses. Emergency planning should establish a process to deal with an emergency and leave most of the specific emergency responses to be developed through that process. There are so many players in the mainstem that trying to pre-plan everything about a future emergency doesn't seem practical or reasonably achievable.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Merle R. Gibbens".

Merle R. Gibbens
Secretary-Manager