

NATIONAL ORGANIZATION TO SAVE FLATHEAD LAKE
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January 9, 2003

Frank L. Cassidy, Chairman
Northwest Power Planning Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204-1348

RE: Comments on the October 2002 Draft Mainstem Amendments
To The Columbia River Basin Fish and Wildlife Program.

VIA: FAX with hard copy to follow via US mail

Dear Mr. Cassidy:

I would like to thank you for the opportunity to provide comment on the October 2002 'Draft Mainstem Amendments To The Columbia River Basin Fish and Wildlife Program'.

I offer these comments on behalf of the hundreds of property and business owners that comprise the membership of the National Organization to Save Flathead Lake (NOSFL).

The National Organization to Save Flathead Lake has two principal goals:

- 1) A full-pool summer lake level of 2893' for Flathead Lake
- 2) A safe winter lake level for Flathead Lake that avoids potential ice damage to public and private property.

Our organization has neither professional nor technical capabilities. We do, however, attempt to maintain an interest in, and where appropriate, participate in the many federal and state processes which impact on the operations of headwaters reservoirs in Montana. More specifically, we become involved in any action that could impact the water levels and flows of Flathead Lake, which would result in ramifications to its social, economic and ecological environment.

Over the past several years, this organization together with several associated groups, state and federal agencies, and countless other interested parties, have developed serious concerns about the management and operation of the federal storage waters in Montana.

During the summer of 2001, a combination of circumstances resulted in profound and costly shortages of water in the region and specifically the Flathead drainage. This incident not only resulted in an emergency situation for the northwestern power producers, but given the mandated downstream demands, it also created an unusably low summer water level at Flathead Lake, jeopardizing resident fish and wildlife habitat as well as costing Northwestern Montana many millions of dollars. The social, economic and investment implications of that disaster continue to ripple throughout Northwestern Montana communities.

In this instance we write to support the adoption of the October 2002 'Draft Mainstem Amendments To The Columbia River Basin Fish and Wildlife Program'. The 'vision' as described within the amendments is not inconsistent with our organizations objectives, although we would add that the needs of people also belong in the overall equation being considered.

The National Organization to Save Flathead Lake supports the premise that the demands and needs of anadromous fish should not come at the expense of our own resident fish. In a situation like we have in Montana where our reservoirs and rivers below the federal dams are drastically impacted by mandated fish flows, it makes sense to seriously consider a regime that balances downstream needs and effects with those felt here. Such an approach could better assure that Montana's resident fish populations, which are clearly impacted negatively through increased outflows from the reservoirs, are protected while anadromous fish are concurrently cared for as well.

In recent years there has been a growing skepticism and controversy over the overall effectiveness and validity of the flow augmentation program and its flow targets. These inflexible demands frequently strain the headwater reservoirs, especially during drought years. We feel that the Council has wisely brought this issue to the forefront and applaud their efforts to have the flows re-evaluated by an Independent Scientific Advisory Board. We too, question this rigid practice and acknowledge that the adoption of the mainstem amendments could produce a more practical and flexible regime that would benefit all fish and wildlife within the system even during drought years.

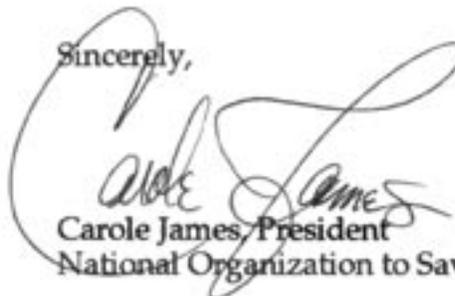
We agree with the Council that rules of operation need to be applied, and that drawdowns and refills must be based on local inflows. We further hold that the headwaters reservoirs should be managed in concert, so that the utilization of available water can benefit resident fish in and immediately below the reservoirs as well as meeting other local needs. To continue operating the hydro system without considering local storage requirements and any related sensitivities in

the headwaters portion of the system, in order to achieve arbitrary flow targets is certain to be counterproductive to resident fish and in violation of the Councils mandate to balance the systems needs.

The National Organization to Save Flathead Lake has long worked for a greater coordination between Hungry Horse Reservoir and Flathead Lake in order to help maintain Flathead at the established summer level of 2893' above sea level. When Hungry Horse Reservoir was constructed it blocked the historic flow of the South Fork into the Flathead River that naturally fed Flathead Lake. We would request that as Council considers the flow operations within the greater mainstem of the Columbia system and summer reservoir operations for Hungry Horse Dam, they be mindful to ensure that no adverse impacts happen to Flathead Lake: neither to the fish, wildlife and ecological needs, nor to the established lake elevations or to the established duration of time at the full pool level to which the economy and investment of the region has been built and based. Anything that would support and work towards these goals will meet with our hearty approval, likewise, anything that would work against these goals would earn our disapproval.

In essence, we think the proposal represents a good, common sense improvement over the status quo and commend the Northwest Power Planning Council for undertaking this work. "Balance" may be the ultimate good in this situation and it is apparent that the Council is working to attain that good.

Sincerely,



Carole James, President
National Organization to Save Flathead Lake.

Cc:

Governor Judy Martz
Senator Max Baucus
Senator Conrad Burns
Congressman Dennis Rehberg