



## OREGON CHAPTER SIERRA CLUB

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I am here representing over 20,000 Oregonians that are members of the Oregon Chapter of the Sierra Club to oppose the draft proposal decreasing the amount of water for salmon and increasing the number of juvenile salmon barged or trucked. I am also a fishery biologist. I continue to be amazed by agencies, such as your own, that profess to want salmon but then whittle away any protection that salmon have because there is no "proof" that salmon need those protections. Proof, in a biological world, is very difficult to come by given natural environmental variation. Therefore we continually destroy salmon habitat bit by bit. The Corps of Engineers wants to deepen the Columbia by three feet- NMFS says go ahead even though there is plenty to indicate that this will be bad for an already degraded estuary. But there is not absolute proof it will be bad. In the Klamath Basin, the Bureau of Reclamation took away water and the result was 30,000 fish died. But the Bureau and farmers say there is no proof that the lack of water killed the fish, despite the warnings of fishery biologists. In British Columbia, studies have indicated that extensive net pen farming of Atlantic Salmon is bad for Pacific Salmon. But these studies are attacked because there was no proof even though wild runs have tended to decline anywhere net pen farms have become common on both coasts. I fear that we will continue to whittle away salmon protections, bit by bit, until they are gone. Even if this does come to pass I am sure that power interests and industrialists will deny that they bear any responsibility for salmon's demise as there is no proof.

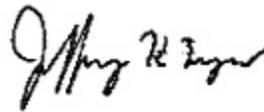
I'd like to know where the proof is that this proposal is good for fish. I wrote my dissertation on Columbia Basin sockeye salmon and I know there is no proof that barging and trucking is good for juvenile sockeye salmon. And the best data I have indicates that high flows speed the outmigration of juvenile sockeye salmon, suggesting again that this proposal will be bad for sockeye salmon. And I know barging is not an option for lamprey. And the past 25 years of trucking and barging chinook and steelhead salmon has given us no proof, nor even any indication, that this will lead to the recovery, of salmon in the wild.

Recently, the Independent Scientific Review Group, in its "Return to the River" highlighted the need for more normative river functions and processes if salmon are to survive and thrive. Just how does a plan such as yours that calls for even lower flows than those meager flows presently granted salmon put us towards a more normative river? And how does barging and trucking fit in with the call for a normative river?

And what is all the money that the BPA will get out of these changes in river operation going towards? Is it going towards buying water rights and key riparian habitat for

salmon in which case perhaps the short term slaughter might be worth the long term benefits for salmon? But no, this money is going to bail out BPA, the same agency that managed to lose money when power prices were high, and then managed to lose even more money when power prices were low. It is the heads of the managers at BPA that should be rolling, instead the power interests are using BPA's ineptitude as an excuse to gut salmon recovery efforts.

I urge you to reconsider your draft mainstem amendments.



Jeffrey K. Fryer  
Salmon Issue Coordinator