



The Confederated Tribes of the Colville Reservation
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February 6, 2003

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

RE: Comments on Document 2002-16, Draft Mainstem Amendments.

Dear Mr. Walker:

The Confederated Tribes of the Colville Indian Reservation (Colville Tribes) are pleased to provide the following comments on the *Draft Mainstem Amendments to the Columbia River Basin Fish and Wildlife Program, Document 2002-16*.

The Colville Tribes support, for the most part, the draft mainstem amendments. However, there are specific areas within the strategy section that we do not support.

Vision for the Mainstem Plan

As part of the Colville Tribes recommendations for the mainstem plan, we specifically identified the need for the plan to identify a regional goal and provided our comments on what a regional goal should include. We recommended that the goal provide for "A functioning Columbia Basin Mainstem, one that supports both human settlement (support tribal and non-tribal harvest and cultural and economic practices) and the long-term sustainability of native fish and wildlife species in native habitats where possible, while recognizing that where impacts have irrevocably changed the ecosystem, we must protect and enhance the habitat and species assemblages that remain. To implement this goal, the Plan will deal with the Columbia Basin mainstem as a system; will protect, mitigate and enhance fish and wildlife while assuring an adequate, efficient, economical and reliable power supply; and will be consistent with the activities of the fish and wildlife agencies and tribes. Implementation will fulfill the nation's and the region's obligations under treaties and executive orders with Northwest Indian tribes, treaties with Canada, and applicable resource protection, restoration and enhancement statutes and regulations." The Vision Statement identified in the draft plan is very consistent with our goal statement.

Biological Objectives

The Colville Tribes support the biological objectives contained in this section of the plan. The broad biological mandate to protect, mitigate and enhance all the fish and wildlife of the Columbia basin affected by the development, operation and management of the hydrosystem has long been a major objective of the Tribe. The recovery of anadromous and resident fish and

wildlife affected by the development and operation of the hydrosystem that are listed under the Endangered Species Act is also very important to the Tribe and we are pleased that this is one of the overarching biological objectives of the program. The language in the overarching biological objective also includes "abundant opportunities for tribal trust harvest" which of course is very important to the Tribe. In addition, the mainstem priority language that provides an emphasis on protecting and restoring mainstem spawning and rearing habitats and populations is especially important to the Colville Tribes. The Tribe has been funding an effort, with assistance from the Army Corps of Engineers to investigate the feasibility of restoring anadromous fish above Chief Joseph and Grand Coulee Dams. Also, the Tribe has proposed a measure to improve mainstem spawning and rearing habitat conditions in the tailrace of Chief Joseph Dam,

The Tribe finds the plan lacking by not including a specific objective and strategy that address water quality issues in the Upper Columbia River mainstem. Both temperature and total dissolved gas concentrations exceed acceptable water quality standards. While some of these water quality issues are being addressed through the Transboundary Gas Group, more focus and effort needs to be provided through this planning process. The resident fish of Lake Roosevelt are severely impacted during above normal water years by high total dissolved gas levels. These TDG levels violate both State and Tribal Water Quality Standards and also exacerbate TDG levels downstream and affect the ability of most of the Mid-Columbia hydroprojects from providing spill levels necessary to meet their juvenile fish passage performance standards. Funding for the final design and implementation of gas abatement at Chief Joseph Dam that should help reduce TDG levels through the Mid-Columbia and improve juvenile fish survival has again been delayed. The mainstem plan needs to more adequately address in detail these issues and develop strategies that are consistent with the overarching biological objectives.

Strategies

Spill: The Tribe continues to support the current spill programs at mainstem dams, believes spill still offers the most effective inriver passage route and is very critical to the survival and recovery of anadromous fish above Bonneville Dam. We do agree that spill programs should minimize impacts on returning adults and not exceed total dissolved gas saturation limits of 120 percent.

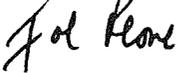
Water Management: The Tribe supports a systemwide water management strategy that balances the needs of anadromous fish with those of resident fish. At the same time, we also support the recovery of listed anadromous fish, especially the upper Columbia listed species.

With respect to the spring reservoir /flow operations, the Tribe does not agree with eliminating the provision in the Biological Opinion that calls for operating storage reservoirs to assure a high probability the reservoir levels are within one-half foot of the upper flood control rule curve by April 10. We are concerned with the affects this would have on reservoir elevations and out flows at Grand Coulee during the spring period. In past years when this provision was not in effect, there were years when the reservoir was subjected to substantially deeper drafts than would have normally occurred as a result of flood control due to power generation that took the reservoir well below the flood control curve in late winter and early spring. As a result of this action, outflows from Grand Coulee were significantly reduced during early spring that led to flows that were considered unacceptable by the fish managers for migrating juvenile salmon and

steelhead through the Mid-Columbia River. The Tribe believes the April 10 provision provides a mechanism for spring reservoir stability, which is important for initial zooplankton production and nutrient retention, and allows for adequate early spring flows in the Mid-Columbia when listed spring chinook and summer steelhead smolts are migrating to the ocean. We recommend the Council reconsider the removal of this provision or consider modifying the operational limit to some degree that would both allow additional flexibility for power generation but also assure reservoir stability and adequate Mid-Columbia flows during the early spring when listed smolts are actively migrating.

The spring and summer reservoir targets for elevation and water retention time are the recommended targets that the Tribe jointly submitted and supported in 1995. While the Tribe still supports these operations, we are strongly committed to the recovery and restoration of upper Columbia anadromous fish. We continue to support spring and summer flow augmentation at levels necessary to provide for survival and recovery of anadromous fish.

Sincerely,



Joe Peone,

Director, Fish and Wildlife Department

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