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From: Kathy Neal [mailto:[redacted]]
Sent: Friday, February 07, 2003 10:47 PM
To: comments@nwppc.org
Subject: Comments on draft mainstem amendments, doc 2002-16

Dear Sirs:

I had hoped to attend the public meeting in Vancouver last month, but had a conflict. I have a few comments regarding the draft mainstem amendments and comments made by other parties.

First, you call for much more economic analysis than has been done previously. It just makes sense to figure what actions provide the most benefit for each dollar spent. Then spend the available money on the most effective measures to produce the most benefits at the least cost. This seems to be a novel concept to many of the groups pushing for salmon recovery.

Transportation is claimed by many groups to be a failed recovery strategy since we've been doing it for 25 years and the salmon haven't recovered. However, these same groups are unwilling to accept the obvious corollary. We've been running water budgets and spills for almost that long, and they haven't recovered the salmon either. If transportation doesn't work and should be abandoned, by the same logic, water budgets and spill for fish should also be abandoned. I don't advocate this, but considering some of the letters, basic common sense seems to be in short supply in parts of the region.

The 1987 NMFS Salmon Recovery team found that for most species transported fish have a higher return rate as adults than fish that remain in the river. This would seem to indicate that a higher percentage fish should be transported. This should work well with reduced spill levels, which improves nitrogen supersaturation levels in the river for those fish that remain in river. I totally agree that it is an un-natural mode for fish to reach the ocean, but if the alternative is to reach the ocean inside a squawfish or floating belly up, a live smolt seems preferable.

The matter of harvest is a touchy matter, but it would seem to make sense to sort the hatchery fish from the wild fish as they go through the fish ladders and provide the hatchery fish to the commercial fishermen. This should provide the gill-netters with a higher profit margin, while doing much less damage to the wild runs. Tribal gillnetting could still be allowed for sustenance and ceremonial purposes, but to spend hundreds of dollars to produce a salmon, so it can be caught and sold for a tenth of the cost of production is just plain nuts. This is not how you recover an endangered species.

The idea of getting rid of the 10 April flood control elevations is excellent. It should reduce nitrogen levels in many years. Since the best science currently seems to show little benefit from higher spring flows, allowing this water to produce winter time energy should produce more

revenue, some of which can be used for fish measures which are more cost effective. Please keep in mind that there are several organized groups out there that seem to have the idea that we should continue or expand the water budget and heavy spill whether it works or not, and hang the cost.

Two years ago we had a drought, and since the fishery community was unwilling to make the decision to abandon the chum below Bonneville dam, resulting in the spring in a very minimal water budget, and due to the energy situation there was also limited spill. This was an invaluable experiment that could have not been performed under any other circumstances. It appears that the returning run is hardly decimated as the fishery agencies and tribes were claiming at the time. This would seem to indicate that the fish can indeed survive with lower flows in the spring and with lower levels of spill. But this unique opportunity should be studied and the best possible data collected.

Some of your commenters have once again called for breaching the Snake River dams. They seem to have the "best science" on their side. After all, in 1999 over 200 Northwest scientists wrote then- President Clinton calling for the dams to be breached. In their press release they pointed out that the Snake River runs have declined 90% since the dams went in, and there are only 10,000 wild fish left and there used to be 4 million. That leaves me somewhat concerned. Simple math shows that of the decline in the Snake River stocks, roughly 97.5% occurred before the dams were built, and 2.5% after the dams were built. This would seem to indicate that either there were some factors that were killing the salmon before the dams were built (none were mentioned), and these factors suddenly stopped harming fish when the dams were built. The other alternative is that the Snake River dams are much worse than previously thought, since they were decimating the runs 50 to 100 years before they were built. My first thought was to blow off the latter option, despite the fact that so many biologists seem to feel this is the case. After all, in the last 20 years the smelt runs have declined precipitously and even the Ozette run of sockeye in pristine habitat was declining. This seemed to me to indicate that problem was most likely ocean conditions, or possibly even over-harvest of salmon, or some other segment of the oceanic food web on which salmon, smelt, etc depended.

However there is some empirical evidence that these biologists might be right. About 10 years ago the talk of breaching the Snake River dams really got under way. Already we are seeing an improvement in the numbers of returning salmon. Is this an indication that we will breach the Snake River dams sometime between 50 and 100 years from now? This might be the best available science, but I still think its necessary to continue research on the off chance that it really was ocean conditions, other factors not yet identified, or whatever caused that first 97.5% of the Snake River runs to disappear.

I think you've derived a set of proposals which are badly needed, and which help inject a bit more common sense into the fishery debates. To truly solve the problem we first have to know what the problem is, and that is accomplished by going out and doing the research. Unfortunately, too much of the research that has been done to date seems to have been designed

to prove a particular point, rather than find the truth. Sadly everyone's got their own studies and computer models, and from looking at the model results, you can practically name the interest group that ran the model. We've spent huge amounts of money on salmon recovery that hasn't helped the salmon. Until we get the actual science done, we won't solve the salmon problem.

Thank You

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