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March 8, 2002

Mr. Mark Walker
Director of Public Affairs
Northwest Power Planning Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204
e-mail: comments@nwppc.org

RE: Comments on the Council's Mainstem Passage Strategies in the Columbia River System: Transportation, Spill, and Augmentation Report

Dear Mr. Walker:

Thank you for the opportunity to submit comments on the above referenced Science Report prepared by Albert Giorgi, Mark Miller, and John Stevenson. These brief comments are being submitted to meet the March 8, 2002 deadline for immediate feedback to the Council. We will continue to review and analyze the report intending to submit additional comments for the Council's consideration in the near future.

These recommendations are submitted on behalf of the Committee of Nine and the Idaho Water Users Association (hereinafter "Idaho water users"). The Committee of Nine is the official advisory committee for Water District 1, the largest water district in the State of Idaho. Water District 1 is responsible for the distribution of water among appropriators within the water district from the natural flow of the Snake River and storage from U.S. Bureau of Reclamation reservoirs on the Snake River above Milner Dam. The Committee of Nine is also a designated rental pool committee that has facilitated the rental of stored water to the Bureau of Reclamation to provide water for flow augmentation (FA) pursuant to the 1995 and subsequent Biological Opinions. The Idaho Water Users Association was formed in 1938 and represents about 300 canal companies, irrigation districts, water districts, agri-business and professional organizations, municipal and public water suppliers, and others.

As evidenced by our past comments[1] to the Council and federal agencies, the Idaho water users' primary concern is the continued use of water from the Snake River above Brownlee (upper Snake) for FA in the name of recovery for ESA listed salmonids. We fully support the recommendation in the last paragraph of Section 3.5 that states:

[1] The Idaho water users have submitted 16 separate sets of comments since October 1999 urging the use of FA from the upper Snake be discontinued or reduced, and certainly not expanded, until a comprehensive scientific analysis shows that FA is a cost-effective recovery tool for ESA listed salmonids.

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> *Given the community's sensitivity to this controversial management action, a holistic comprehensive updated evaluation seems prudent, and long overdue.*

Further, we support the conclusion at the end of Section 3.6 of the report that states:

> *To fully address concerns regarding anadromous fish and resident fish will require a significant effort. But without such an effort it is not clear how the region can determine if the status quo as prescribed in the FCRPS is an effective water management strategy for measurably improving salmon survival.*

We want to again stress that between year flow survival analysis cannot be used as a surrogate for evaluating FA effects. Most importantly, a low water year cannot be made into a good water year through FA. The variation in discharge between good and poor water years in the upper Snake is more than all of the storage in the upper Snake basin. Even if more storage were available, simply increasing flow in a low water year will not address other environmental differences that occur between low and high flow years, such as temperature and turbidity.

The focus of a comprehensive evaluation of FA must be on survival, FA/SAR relationship if any, rather than identification of any FA/travel time relationship. The first sentence of section 3.1.2 of the Science Report is correct in that if there is any underpinning for continued FA it must be shown to improve survival of the listed species to aid recovery. We commend the authors for their recognition that the Simms and Ossiander flow-survival relationship does not accurately reflect present conditions.

We are disappointed the authors did not consider the September 2000 report, Review of Survival, Flow, Temperature, and Migration Data for Hatchery-Raised, Subyearling Fall Chinook Salmon Above Lower Granite Dam, 1995 – 1998 by Dreher, et al. The Dreher report has been presented to the Council and we believe it adds to the knowledge to be gained from the data used in the Muir et al. (1999) report cited in the Science Report. We urge the Council to consider the Dreher report when reviewing the need for continued FA in the Fish and Wildlife Plan.

We are also disappointed that the authors apparently did not consider two reports prepared in 2000 by Dr. James Anderson and others, Heat Budget of Water Flowing through Hells Canyon; and the Effect of Flow Augmentation on Snake River Water Temperature, and Effects of Flow Augmentation on Snake River Fall Chinook (http://www.cqs.washington.edu/papers/jim/flowaug_fch.pdf>). These reports have previously been provided to the Council and Dr. Giorgi. We also urge the Council to consider these reports when reviewing the need for continued FA in the Fish and Wildlife Plan.

The authors of the Science Report note the lack of comprehensive evaluations of FA yet Council Program 199102900 seems to be focused squarely on the evaluation of FA effect on survival of Fall Chinook Salmon. We understand this program has been in place for over 10 years and has been funded for nearly $10 million. When should results from that

program be expected as they may be key to determining the scope of the future comprehensive evaluation of FA called for in the Science Report?

Finally, in conjunction with the Science Report prepared by Giorgi et al, we strongly urge the Council to review our concerns and recommendations on the Mainstem Plan that were submitted to the Council on June 15, 2001. As we discuss in those recommendations, revisions to the Plan should reflect new scientific information (such as that described above) as well as the physical, economic, legal and political realities in the region.

We appreciate this opportunity to provide comments to the Council on the Science Report on Fish Passage Strategies and commend the Council for the selection of authors.

Respectfully submitted by,

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On behalf of the Committee of Nine

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