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WESTERN MONTANA ELECTRIC GENERATING & TRANSMISSION COOPERATIVE, INC.

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December 1, 2003

BY FACSIMILE

Mark Walker
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RE: Comments on the APRE Paper

Dear Mr. Walker:

The members of Western Montana Electric Generating and Transmission Cooperative (WMTG&T), all of whom purchase all or most of their power from the Bonneville Power Administration, appreciate the opportunity to comment on the Northwest Power and Conservation Council's (the Council's) paper on Artificial Production and Review (APRE). Serving over 100,000 consumers in Western Montana, WMTG&T's members are extremely concerned about the efficiency and cost-effectiveness of fish and wildlife programs funded by Bonneville from rates charged to our consumers. As such, we have been very supportive of efforts by both Bonneville and the Council to address the cost-effectiveness of fish and wildlife programs.

WMTG&T members believe that this paper is another critical step toward addressing the inconsistencies, conflicting goals and objectives and lack of cost-effectiveness in some fish and wildlife programs. As the first major review of all hatcheries in the region, this paper is both scary and disheartening. It is scary in that this type of review has never been completed before, despite the hatchery program's cost and impact on salmon species. The report is also disheartening in that it highlights the complete lack of a coherent hatchery policy despite many years of ratepayer and taxpayer funding.

WMTG&T has three main comments on the APRE paper. First, the paper calls into question the management of all salmon species in the Columbia River Basin. It is clear, once again, that there is no coherent policy or set of strategies to deal with Endangered Species Act listed salmon species. Second, the hatchery program as implemented in the Northwest itself operates without a coherent policy and often at cross-purposes both with other hatcheries and other elements of the salmon recovery effort. Finally, until consistent strategies are developed and implemented for both the overall salmon recovery effort and the hatchery program, ratepayer funds will continue to be wasted.

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ADREC/Comment on APRE Draft Report 2003-17/14-2003

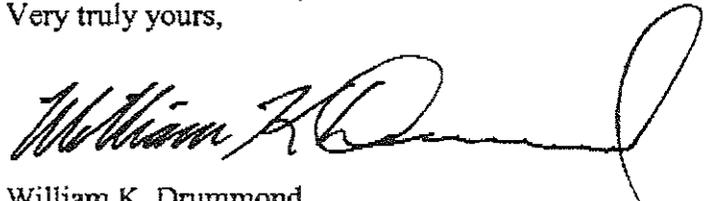
The APRE paper describes numerous problems with the current hatchery program. For example, despite being an integral part of salmon recovery efforts, hatcheries have failed to implement even the most elementary adaptive management techniques. Hatchery managers seem hide-bound to goals and objectives often developed 25 years ago, long before salmon stocks were listed under the ESA and at a time when fish-economics were radically different. Additionally, despite the recent record returns of fall chinook, most hatcheries are focused on producing fall chinook, instead of the less abundant and more valuable spring and summer chinook. These are but two of the more egregious problems with the current hatchery program.

The next step for this process is to clearly delineate what the goals and objectives for hatchery production should be. This requirement should also apply to the larger issue of salmon recovery generally. Additionally, hatchery program managers should be required to implement adaptive management techniques so that hatchery production can respond to changing goals and objectives over time. Finally, hatchery managers should be immediately required to collect data for the purposes of monitoring and evaluation. It is reprehensible that 95 percent of all hatcheries do not collect recruits-to-smolts data or that virtually two-thirds of all hatcheries have no smolt-to-adult survival figures.

The Council's APRE paper is an excellent first step toward hatchery reform. Having been in the Columbia Basin for over 100 years and as one of the "four Hs" of salmon recovery, hatcheries are an integral part of the region's salmon strategy. The APRE paper illustrates, however, just how far both the salmon recovery program and particularly the hatchery program has to go.

Thank you for the opportunity to comment. Please feel free to contact me if you have any questions.

Very truly yours,



William K. Drummond
Manager

cc: WMG&T Board of Trustees
Member System Managers
Ed Bartlett
John Hines
Kerry Berg
Jerry Leone