

Date: 2/23/03
To: NWPPC
From: Terry Hastings
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Re: amendments to mainstem policy

I wholly support reduction in the folly commonly referred to as flow augmentation, and would like to suggest that the council is not going far enough with its modest proposal of reduction of this highly dubious science.

In reading the latest review by the ISAB on flow augmentation dated 2-10-03 I see little or no benefit once flow exceeds 100K/50K cfs for spring smolt/fall smolt respectively. For flows below these levels the ISAB concludes there may be "some" benefit.

What I do not see is a definition of just what "some" means. Are we realizing additional adult returns of 1 fish, 100 fish, 1000000 fish or what? What are the costs to the electrical ratepayers of the Pacific Northwest for flow augmentation? What is the cost in \$/returning adult fish for flow augmentation? Everyone wants to save the salmon. Only the extreme elements of the environmental movement want to do this on a cost is no object basis.

So far, flow augmentation has cost the ratepayers of the Pacific Northwest well in excess of \$1,000,000,000, and the best that can be said for it is that it may have "some" benefit. That is a huge sum of money to spend for something that cannot be quantified any better than "some".

Other research suggests that "some" benefit of flow augmentation is a false promise that is statistically biased by the extreme low water year of 2001. Mr. James Anderson states on page 51 of his research paper 'An analysis of smolt survival with implications to flow management' dated 2-6-03:

"I suggest the relationship (flow/survival) is spurious and is wholly dependent on the data from 2001, which was a year with low flow and high temperature. The conclusion from my analysis is that temperature, not flow, produced the correlation. Remove 2001 from analysis of survival with water transit time and the correlation disappears. In contrast, remove 2001 from the XT-analysis and the correlation with temperature and travel distance remains and is equally significant."

Over time, Mr. Anderson's work has been proven true. I think the council should spend more time reading Mr. Anderson's work and less time listening to the 'back to nature' crowd.

The energy crisis has been blamed for BPA's current financial predicament. This is part of the truth, but it is not the whole truth. Eco-extremism is also a significant factor in BPA's current fiscal mess. Spill and flow augmentation are probably two of the most extreme examples of out of control environmental extremism driving public policy to the detriment of our electrical rate structure. On a dollar per returning adult fish basis flow augmentation goes beyond folly. It is waste of the ratepayer's money on a mind-boggling scale. The council jeopardizes its own credibility to allow this to continue.

I urge the council to filter out the hype of the environmental media machine and immediately pare back those programs that cannot be proven cost effective on a \$/returning adult fish basis.

Thank you for this opportunity to comment on how my electrical rate dollars are to be spent.

Tlh