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December 22, 2004

Mr. D. Robert Lohn
Regional Administrator
NOAA Fisheries
525 NE Oregon Street, Suite 500
Portland, OR 97232

Mr. Steve Wright, Administrator
Bonneville Power Administration
PO Box 3621
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Mr. David B. Allen, Regional Director
U.S. Fish and Wildlife Service
911 NE 11th Avenue
Portland, OR 97232-4181

Dear Sirs:

The Council's 2003 Mainstem Amendments call for the action agencies to implement and evaluate a particular summer operation at the Hungry Horse and Libby projects in Montana as an experiment. This operation would extend the summer drafts to the end of September, reduce the amount of the draft in all but the lowest 20% of water years, and draft the projects in such a way as to produce stable or very gradually declining outflows. The Council hypothesized that this operation "will significantly benefit listed and non-listed resident fish in the reservoirs and in the portions of the rivers below the reservoirs without discernible effects on the survival of juvenile and adult anadromous fish when compared to ordinary operations under the biological opinions."

In a July 19, 2004, letter from NOAA Regional Administrator Bob Lohn to Council Chair Judi Danielson, Mr. Lohn requested that the Council convene a symposium to gather the information that would be required to guide a decision on summer operations for the Hungry Horse and Libby projects in 2005. In short, the symposium was to investigate the efficacy of the Council's hypothesis based on the current state of the science, and, if needed to render conclusions on that hypothesis, how to structure additional investigations or experiments.

In response to Mr. Lohn's request, the Council hosted a two-day symposium on reservoir operations on November 9 and 10. The symposium convened top scientists from the region to discuss the most current information on fish survival issues related to reservoir operations in the

lower Columbia River and effects of past and current biological opinion operations on species in and downstream from the project reservoirs. Members of the Independent Scientific Advisory Board received this information at the symposium, considered it, deliberated and have issued a written report.

The findings of the ISAB were presented to the Council last week at its meeting in Portland. One purpose of this letter is to transmit the report and the conclusions of the ISAB to NOAA Fisheries and the other federal agencies involved in hydrosystem operations. "ISAB Findings from the Reservoir Operations/Flow Survival Symposium," Council Document No. ISAB 2004-2 (Dec 2004), on the Council's website at <http://www.nwcouncil.org/library/isab/isab2004-2.htm>.

The ISAB concluded that the Council's hypothesis regarding the likely biological consequences of the operations is reasonable and supported by the available science. Among other things, the ISAB found that any effects on anadromous fish in the lower river from the proposed operation are likely too small to measure practically against both measurement error and background variation due to other causes. At the same time, the ISAB identified a number of other issues and attributes regarding the relationship of flow and survival in the lower river that do need further investigation, including a reasonable concern about the potential cumulative effects of many small changes.

The ISAB report contains analysis and conclusions that the federal agencies should review as soon as possible as you plan for hydrosystem operations in 2005. The ISAB report supports testing the hypothesis underlying the summer operation experiment called for in the Council's program. The Council again asks the federal agencies to begin implementing this provision of the program in the summer of 2005, including providing the operations called for and funding the evaluations specified. These evaluations would consist of (1) a monitoring project to assess whether in fact the proposed operation benefits resident fish, as hypothesized; (2) similarly, a physical flow monitoring project to verify whether in fact the change represented by the operation does indeed have no discernible effect on flow in the lower river; and (3) research that is part of the region's general ongoing work at "ascertaining the nature, extent of and reasons for a flow-survival relationship through the lower Columbia system," presumably addressing one or more of the issues identified by the ISAB. The program also calls on the agencies to implement this summer operation in a way that ensures no adverse biological effect on Lake Roosevelt.

We appreciate your attention to the ISAB's report and to the Council's request in this letter. We look forward to working with you to implement this and all other provisions in the 2003 Mainstem Amendments.

Sincerely,

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Judi Danielson
Chair