

Comment on **Summer Spill Proposal**

View open comment periods on <http://www.bpa.gov/corporate/kc/home/comment.cfm>

Joe McGrath  
Snohomish County PUD  
jlmcgrath@snopud.com  
425 783-1768  
2320 California Street  
Everett WA 98206

APRIL 7, 2004

Mr. Stephen J. Wright  
Administrator  
Bonneville Power Administration  
P.O. Box 3621  
Portland, OR 97208-3621

Brigadiers General William T. Grisoli  
Commander and Division Engineer  
U.S. Army Corps of Engineers  
Northwestern Division  
P.O. Box 2870  
Portland, OR 97208-2870

Mr. Bob Lohn  
NOAA Fisheries  
Office of Regional Director  
7600 Sandpoint Way NE  
Seattle, WA 98115-0070

Dear Administrator Wright, Brigadier General Grisoli and Mr. Lohn:

Snohomish County PUD appreciates the opportunity to comment on the Preliminary Proposal by the Bonneville Power Administration and U.S. Army Corps of Engineers regarding your March 30<sup>th</sup> Summer Spill Test Proposal on certain Columbia River projects. We applaud your goal, which is to achieve similar or better benefits for salmon at less cost than the current summer spill program.

Last year Summer spill cost the citizens of the Northwest \$110 million, and this year the projected cost is \$77 million-- for an estimated cost per listed adult fish of \$3 million.

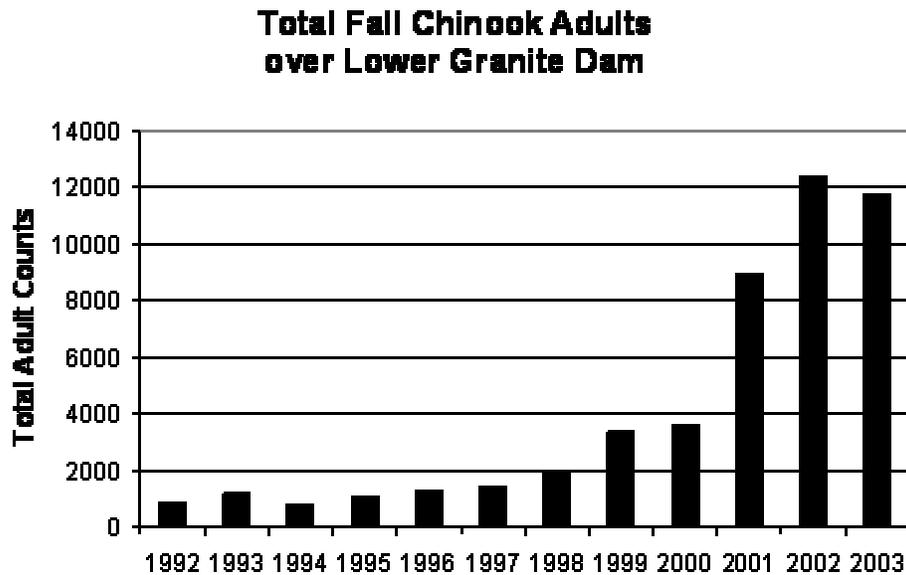
With record salmon returns, this is the time to test whether summer spill is producing any measurable benefits, and if so whether those benefits can be obtained at far less cost.

The Proposal indicates that the suggested mitigation actions such as Enhanced Northern Pikeminnow management and Hanford Reach stranding protection flows would "... offset approximately half the impact of the proposed spill reduction and therefore do not meet the criteria for providing similar or better benefits, ...".

We believe that one purpose of the test should be to determine whether there are any measurable benefits that would need to be mitigated. But if there are, the two proposed

mitigation actions appear to be sufficient, especially if a broader view is taken. The Proposal states that approximately half of the 20 ESA-listed Snake River Fall Chinook adults estimated to be lost from summer spill reductions will be recovered by the two mitigation actions. That leaves 10 listed Snake Chinook.

Recent, documented returns of these fish are displayed in the following chart.



- *“Summer Spill” benefits about 1.5% of Snake River fish, and less than 1% of threatened fish.*

These salmon are clearly enjoying a robust recovery, similar to that of many stocks in the region due to more favorable ocean conditions, reduced ocean and other harvest and continuing recovery efforts throughout the region.

While the goal of the proposal is to achieve similar or better biological benefits for salmon, the projected loss is an estimate, derived from a myriad of inherent uncertainties such as the range of potential smolt-to-adult return rates (SARs). The recent returns detailed above suggest that the degree of unmitigated loss contended in the proposal for ESA-listed species is now less than 1 tenth of 1% of returning adults.

The proposal suggests/offers a number of approaches to resolving the unmitigated loss issue. While each offer is an opportunity, some lack the ability to immediately impact adult returns (again predation research) while others amount to very expensive solutions (Weirs) for such a small number of salmon at risk.

Mindful that the search for a solution can sometimes cause a loss of focus, the PUD would suggest that the cost effectiveness principle that has fostered this effort to date should continue to guide the selection of additional offset measures.

One cost effective solution is in addressing in a better way harvest activities. According to statistics derived from 2003 harvest data, Columbia and Snake River fall chinook are harvested in-river, at a rate of 32% of the total population estimated to return to the Columbia River. Additionally:

- The non-treaty harvest of fall chinook is 8% or 1/3 of the total. The non-tribal harvest is then allocated commercial 3 to 4 % for commercial and 4 to 5% sport harvest. (These are annual average numbers.)
- The treaty tribal harvest is 24% or 2/3 of the total.
- A less than 1% reduction in lower river non-tribal commercial harvest would more than adequately mitigate from any adverse affects to listed Snake River fall chinook salmon. According to actual non-treaty commercial harvest from 2003, a 2% total reduction in lower river non-tribal commercial harvest would result in an additional 160 ESA listed Snake River fall chinook salmon escaping upriver.

The call for modifications in the rate of harvest is not a new perspective in the salmon recovery dialogue. An excerpt from an article in the April 2, 2004 Vancouver Sun demonstrates where Canada is likely headed on the issue:

Commercial salmon fishermen are bracing themselves for the biggest changes to sweep their fleet since British Columbia joined Confederation in 1871.

A report to be submitted to the federal and provincial governments is widely expected to recommend an end to the "race for salmon" that has marked the commercial fishery since its inception.

In its place, a report by co-authors Peter Pearse and Don McRae is expected to recommend that individual fishermen be issued quotas -- a system that has proven effective in other fisheries but effectively privatizes this controversial public resource.

The report is also expected to recommend the removal, in perpetuity, of a portion of the commercial salmon harvest in order to settle treaties with First Nations.

Many others have pointed out the inherent contradiction of allowing harvesting of the very species that are listed as threatened or endangered.

Almost a decade ago, Senator Dan Evans, in a speech called "Claiming Our Future," (Seattle Post-Intelligencer, January 13, 1995) said that lower fish returns were due largely to ocean conditions and commercial overharvest:

"We must fully utilize our natural advantages to build economic strength. One of the most important of these is low-cost electric power. More and more of our manufacturing processes are using electricity and we enjoy the lowest power rates in the United States. That is a dramatic competitive advantage.

The basic producer of our low-cost hydroelectric power is the Columbia River System, much of it managed through the Bonneville Power Administration. The current national administration proposed changes that would radically increase power rates at Bonneville. Strong reaction from the Northwest Congressional delegation halted this proposal temporarily. But we must seek a permanent solution that will guarantee stability in power rates and remove the threat of Congressional tinkering. Electric rates are under siege from another source.

The Northwest Power Planning Council, under pressure by the courts and federal fisheries agencies could order costly fish protection measures that will be of questionable benefit. Foolishly raising the cost of energy based on shaky science is not only highly speculative, but wrongheaded. The decline of our salmon fishery is due largely to overfishing in the ocean and changes in the ocean currents. Few know that the largest salmon runs on the Columbia river in the past 50 years were in 1986 after all the dams were built.”

A very small change in harvest regimens can successfully mitigate any losses estimated to occur to ESA listed fall Chinook as a result of reductions in summer spill. The changes can be quickly implemented, and the effect will be immediate and certain.

Together with the original offsets, the proposal’s goal to achieve similar or better biological benefits for salmon, at less cost than the current summer spill program, can be met.