



June 14, 2004

Mr. Stephen J. Wright
Administrator
Bonneville Power Administration
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Brigadier General William T. Grisoli
Commander and Division Engineer
U.S. Army Corps of Engineers
Northwestern Division
P.O. Box 2870
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Mr. Bob Lohn
Regional Director
NOAA Fisheries
7600 Sandpoint Way NE
Seattle, WA 98115-0070

Dear Sirs:

The proposal issued June 8, 2004 to change summer spill operations is a landmark in salmon recovery. It marks a change in thinking. The Northwest called for more effective salmon recovery and better economics for our region. The federal action agencies are proposing something that is headed in the right direction.

The PNUCC members support the general spirit of the proposal, but we must express disappointment in the retreat from earlier proposals that would have accomplished more. While the current proposal begins to create a more cost-effective system of salmon recovery, it simply does not go far enough. These changes in summer spill should be the first step in ensuring protection for the highest number of salmon at the lowest cost to the region. This proposal saves more fish and costs the region less money. For that you are commended.

The latest federal proposal is a mixture of extremes. It sets the goal of mitigating for the largest possible impacts from the operational changes by using an extreme, worst-case scenario. To address this maximized impact, the proposal cites the smallest possible

benefits from the new mitigation strategies and fails to include benefits of other programs. This conservative approach seems to assume that there is only one chance to influence salmon runs, while they are migrating as juveniles. It is important to remember that if mitigation strategies for juvenile fish fail to deliver the needed results those salmon stocks can still be helped years later when they return to the Northwest as adults.

While this proposal is a first step toward a cost-effective salmon recovery strategy, there is a long way to go to achieve that goal. It is important that these opportunities are utilized in future planning. Investing in quality hatchery programs has the advantages of being targeted and quantifiable, allowing the region to help specific salmon stocks and being able to evaluate the results. Increasing the production of certain hatcheries or modifying their operations could substantially benefit salmon populations. Changes to commercial harvest practices provide the most certain way of recovering salmon. This strategy protects the adults that have already survived whatever ocean conditions they met and are the best chance for future generations. Commercial harvest modification does not need to be at the cost of fishermen, but can be a win-win scenario. This is a case where collaboration can be more than an industry buzz-word, it can improve the protection for salmon and benefit the people of the Northwest.

The federal agencies have been meeting the performance standards of the 2000 FCRPS Biological Opinion, but that accomplishment has come at a great cost to the region. Power rates are at extreme levels making rate payers desperate for relief. Now more than ever it makes sense to examine salmon recovery efforts and ensure cost-effectiveness. The long-term salmon recovery process is not aided by spending without comparable returns. It is important that you continue to find opportunities to increase the cost-effectiveness of Northwest salmon recovery efforts.

Thank you for your work on these difficult issues. We recognize and appreciate your leadership and the important role you play in shaping the future of our region.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Adams". The signature is fluid and cursive, with a large initial "R" and "A".

Richard Adams
Executive Director

cc:

Northwest Power & Conservation Council Members
Governor Ted Kulongoski
Governor Gary Locke
Governor Dirk Kempthorne
Governor Judy Martz