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February 2, 2004

John Stein, Ph.D.
Salmon Science Coordinator
Northwest Fisheries Science Center
2725 Montlake Blvd. East
Seattle, WA 98112-2097

Re: Comments on Northwest Fisheries Science Center Technical Memoranda

Dear Mr. Stein:

I am writing on behalf of the Save Our Wild Salmon Coalition (SOS) to comment on the Northwest Fisheries Science Center draft Technical Memoranda written as part of the remand process to rewrite the 2000 Federal Columbia River Power System (FCRPS) Biological Opinion (BiOp). I appreciate this opportunity and hope that these comments provide your agency with useful guidance to ensure the recovery of salmon and steelhead in the Columbia and Snake River Basin.

With a combined membership of over six million, SOS is a diverse nationwide coalition of commercial and sport fishing associations, conservation organizations, taxpayer advocates, clean energy proponents, businesses and others joined under a single unifying mission: to restore self-sustaining, harvestable populations of wild salmon to the rivers and streams of the Pacific Northwest. Our membership benefit from both the sheer beauty of these species as well as from the economic benefits they bring to the region. Thus our members are extremely interested in the rewrite process.

The Technical Memoranda are intended to address and update the available data on the impacts of the FCRPS on Endangered Species Act (ESA) listed salmon and steelhead in the Columbia and Snake rivers. As such, these documents are an integral component of the upcoming Biological Opinion and form the scientific basis for the policy decisions therein. With that in mind, it is absolutely critical that a fair and equitable collaborative process - agreed to by state and tribal fish and wildlife managers - be developed with haste in order to air the best available scientific data during the remand process.

On January 23, 2004, representatives from the Nez Perce Tribe, the Confederated Tribes and Bands of the Yakima Indian Nation, the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Washington Department of Fish and Wildlife, and the states of Idaho and Oregon submitted a joint proposal on how to best provide a collaborative scientific process as part of the pending remand. We wholly support this proposal and recommend that it commence immediately. We believe that a collaborative scientific discussion need not result in a lengthy delay in the rewrite process. To date, NOAA Fisheries has been unwilling to engage state and tribal salmon experts in a meaningful collaborative process.

Alaska Trollers Association
American Rivers
Association of Northwest Steelheaders
Boulder-White Clouds Council
Clearwater Biodiversity Project
Coalition for Salmon-Steelhead Habitat
Coast Range Association
Columbia Riverkeeper
Defenders of Wildlife
Earthjustice
Federation of Fly Fishers
Friends of the Clearwater
Friends of the Earth
Idaho Conservation League
Idaho Rivers United
Idaho Steelhead and Salmon Unlimited
Idaho Wildlife Federation
Institute for Fisheries Resources
Izaak Walton League - Greater Seattle Chapter
Lands Council
Lighthawk
Long Live the Kings
The Mountaineers
National Wildlife Federation
Natural Resources Defense Council
North Cascades Conservation Council
Northwest Ecosystem Alliance
Northwest Resource Information Center
Northwest Sportfishing Industry Association
NW Energy Coalition
Oregon Guides and Packers Association
Oregon Natural Desert Association
Oregon Natural Resources Council
Oregon Trout
Oregon Wildlife Federation
Pacific Coast Federation of Fishermen's Associations
Pacific Environmental Advocacy Center
Pacific Marine Conservation Council
Puget Sound Harvesters
Purse Seine Vessel Owners Association
Rivers Council of Washington
Salmon For All, Inc.
Salmon For Washington
Sawtooth Wildlife Council
Sierra Club
The Wilderness Society
Trout Unlimited
Washington Kayak Club
Washington Trollers Association
Washington Wilderness Coalition
Washington Wildlife Federation
Water Watch of Oregon
Wild Angels
Willamette Riverkeeper

As a result of the lack of meaningful collaboration to this point, the Technical Memoranda suffer severely, lacking the best available science and a cohesive framework to do the appropriate analyses. These systemic failings have created overarching problems in all of the papers. The Memoranda are without critical peer review from technical experts throughout the region. In several of the papers it is clear that the absence of this peer review and collaboration has created analyses devoid of regional biologists' best thinking. As one example we point to the starkly contrasting conclusions of federal, state, and tribal fishery managers and the Memoranda on turbine efficiency (see attached for more information). Limiting the analyses in this way creates a sense that instead of using data to more accurately define critical needs for listed species, the agency is offering post-hoc rationalizations for establishing hydrosystem/revenue priorities at the expense of salmon protections.

Moreover, there is little rationale provided in the documents for how and why certain conclusions were drawn. These analytical holes make it difficult to comment effectively on these papers. In some cases (e.g., the estuary white paper), the scant information provided in the analyses not only limits the reader's ability to understand how conclusions were drawn, but much of the information presented seems to contradict those very conclusions. If not corrected soon, the end result will be a BiOp that does not have the confidence of regional fishery experts, does not rely on the best available science, and does not adequately protect the listed species.

In addition to these overarching and fatal flaws in the Technical Memoranda, we have specific concerns associated with each of the four papers outlined in the attached document on a paper-by-paper basis. Again, given our overarching concerns, it is difficult to provide a more thorough review of the papers. We hope and expect that once an agreed-upon collaborative process gets underway, there will be an appropriate forum for experts to air more detailed concerns.

Thank you again for the opportunity to provide comment.

Sincerely,

Pat Ford
Executive Director