

Regional Impacts of Plaintiff's Proposal

5/19/05

The following are highlights of the federal agencies' response brief regarding potential impacts of plaintiff's proposal, National Wildlife Federation et al v. National Marine Fisheries Service and U.S. Army Corps of Engineers, filed April 22, 2005, U.S. District Court, District of Oregon.

Biological Impacts

The Federal action agencies' Updated Proposed Action follows the most prudent course of staying with the strategy under which the runs have increased, while committing to fund research to better understand the biological phenomenon of yearling life history strategy of fall chinook.

To choose an untried operation in such a critically low water year would be to experiment with this threatened species running the risk that any speculative increases in survival through in river migration do not materialize. A prudent salmon manager should not gamble with species at risk. While the plaintiffs have not described with specificity the particular operations of the hydro system they would undertake to achieve their goal, based on my knowledge and experience it appears that the operations necessary to achieve the water particle travel time goal this summer would cause greater mortality to listed fish than those in the current biological opinion.

Declarations of D. Robert Lohn, Regional Administrator, National Marine Fisheries Service

In addition to failing to provide quantitative survival data on their recommended spill operations at the lower Snake River projects, the [plaintiff's] also fail to discuss the biological *risks* to different salmonids stocks associated with their suggested action.

Declaration of Rock Peters, Senior Program Manager, Northwest Division, United States Army Corps of Engineers

Resident Fish Impacts

Grand Coulee lower lake levels will also adversely affect resident fish interests. Lower lake levels increase entrainment of resident fish through the dam; block resident fish from spawning sites; reduce nutrients for resident fish due to decreased water retention time, and impact net pen operations which require a water surface elevation of 1283 feet or higher.

Declaration of D. James Fodrea, Jr., Columbia/Snake Salmon Recovery Office, United States Bureau of Reclamation

Navigation Impacts

Drawdown of Lower Granite reservoir below Minimum Operating Pool would shut down the lock operation to commercial vessels because there is insufficient draft over the upstream sill of the lock and in the channel above the lock. This eliminates commercial traffic above Lower Granite Dam, which includes the ports of Lewiston, Clarkston, and Wilma.... total economic losses over a 2-1/2 month drawdown period yields an average loss of \$2.5 million. This assumes there is capacity to handle changes in transportation modes, which in the short-term may not be adequate unless much higher costs are paid.

Declaration of Gregory S. Graham, United States Army Corps of Engineers

Irrigation Impacts

The proposals for injunctive relief made by plaintiffs could have significant, long-term negative impacts on virtually all of Reclamation's projects in the Columbia and Snake River basins; these impacts include harm to other species listed under the ESA, potential violations of clean water standards, violations of state water laws, failure to meet authorized project water deliveries, economic impacts and an increased likelihood that Reclamation reservoirs would not refill sufficiently to meet salmon flow augmentation obligations and other authorized project purposes in future years.

Declaration of Kenneth R. Pedde, Deputy Regional Director, Pacific

Recreational Impacts

The additional draft would have potential adverse economic impacts to the tribal and other recreational concessions for 2005 due to the effects of reduced [Grand Coulee] lake levels on recreational activity. We estimate that half of the boat ramps on the lake would be inaccessible with the additional draft.

Declaration of D. James Fodrea, Jr., Columbia/Snake Salmon Recovery Office, United States Bureau of Reclamation

Drafting Dworshak from elevation 1520 feet to elevation 1470 feet would ...reduce access to available recreational boat ramps (see Graham's declaration).

Declaration of David J. Ponganis, United States Army Corps of Engineers Northwest Region, United States Bureau of Reclamation, Boise, Idaho

Economic Impacts

Simply put, the effects of the proposed 2005 operations carried over into 2006 (assuming an average water year and average market conditions and resumption of UPA operations) would result in an expected loss of revenues over the two years, FY2005 and FY2006 of \$102 million.

Declaration of Roger Schiewe, Fishery Impact Technical Expert and Principal Hydro Power Systems Operations Engineer, Bonneville Power Administration