



August 12, 2014

U.S. Army Corps of Engineers, Portland District
ATTN: CENWP-PM-E/Double-crested Cormorant draft EIS
P.O. Box 2946
Portland, OR 97208-2946

Re: Public Power Council Comments on Draft EIS: Double-crested Cormorant Plan to Reduce Predation of Juvenile Salmonids in the Columbia River Estuary

Dear Project Manager:

Thank you for the opportunity to comment on the Draft EIS Double-crested Cormorant Plan. The Public Power Council (PPC) represents over 100 consumer-owned utility customers of the Bonneville Power Administration. As the primary customers of BPA, PPC members fund regional fish and wildlife mitigation efforts totaling approximately \$700 million annually and have a vested interest in ensuring these efforts are not inadvertently unwound by inaction or by a lack of addressing salmon mitigation comprehensively.

PPC appreciates the tremendous effort undertaken by the U.S. Army Corps of Engineers (Corps) to control animal populations that prey on juvenile salmonids in the Columbia River Basin, and we see that the regional investment for salmon and steelhead is working in many respects. While we are largely supportive of the Preferred Alternative (Alternative C) in the draft EIS, we believe the Corps should take a more expeditious and aggressive line on avian predation.

The development of this plan is a requirement of Reasonable and Prudent Alternative Actions 46 and 67 of the NOAA-Fisheries 2008 Biological Opinion (BiOp) for the Federal Columbia River Power System (FCRPS), as updated in 2010 and 2014. But, for six years since the 2008 BiOp release, predation by piscivorous birds in the Columbia River Basin has annually increased to a point where they are now consuming almost 25 million juvenile salmonids each year. A majority of these fish are from ESA-listed populations and a majority of these losses are a result of cormorant predation. This is alarming in light of the massive effort underway in all areas of the system to protect these fish.

With the region's salmon and steelhead mitigation costs amounting to nearly \$700 million annually, it is disappointing to see minimal management of avian predation in the suite of mitigation actions. We are appreciative of the Corps' recent efforts, however, in addressing this important issue both in the estuary and on the Upper Columbia. Losing millions more salmon and steelhead to avian predation simply cannot continue.

PPC believes that the Corps is correct in attempting to control the exploding cormorant population and return balance to the mouth of the Columbia River. Prior to the Corps' own dredging effort that built East Sand Island, the island was no more than a sandbar, insufficient for nesting birds. Though we are supportive of healthy populations of all fish and wildlife, East Sand Island is an unnaturally created place where the overabundance of double-crested cormorants is dramatically detrimental to ESA-listed salmon and steelhead.

The Corps' Preferred Alternative C is certainly a step in the right direction in managing this population and bringing it back into balance in the region. PPC generally supports this Preferred Alternative but believes the Corps should go further and adopt Alternative D. Alternative D employs most of the same management, but excludes future nesting by cormorants on East Sand Island. This option appears to be the one most inclined to remedy the issue being addressed. If the Corps allows the cormorant population to continue to nest on the island, it seems that continued culling would need to take place in order to maintain the target number of breeding pairs.

PPC implores the Corps to expedite these already long delayed management actions. As noted above, the requirement to manage fish losses due to piscivorous birds was included in the 2008 FCRPS BiOp. Yet, it is only now in 2014 that a draft management plan has been released. Further delay would potentially result in the loss of millions more juvenile salmon and steelhead.

As evidenced by the latest adult salmon and steelhead returns, we have seen that regional efforts of the past two decades are generally working well. Avian predation, however, continues to jeopardize these gains. While the Corps' Preferred Alternative is a great improvement over current management, we most support the expeditious implementation of Alternative D.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bo Downen', with a stylized flourish at the end.

Bo Downen