



## Public Power Council

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To the representatives of the Action Agencies:

We appreciate the opportunity to comment on the draft 2013 Comprehensive Evaluation of the first five years of progress in implementing NOAA Fisheries' Biological Opinion for operation of the FCRPS for ESA-listed salmon and steelhead. The Public Power Council (PPC) represents the consumer-owned utility customers of the Bonneville Power Administration (BPA). As the primary customers of BPA, PPC members and their customers fund a majority of the mitigation requirements of the FCRPS Biological Opinion. Subsequently, we have a vested interest in ensuring fish and wildlife mitigation programs are efficient, cost-effective, and productive in mitigating the adverse effects of the FCRPS on fish and wildlife populations in the Columbia River Basin.

PPC members have invested over \$13 billion since 1978 to mitigate the impacts of the federal hydrosystem on fish and wildlife in the Columbia River Basin. Over \$1 billion of that has funded BPA's direct fish and wildlife program which supports a substantial portion of the measures required by the BiOp. These costs have real impacts to the ratepayers of the Northwest. PPC is supportive of mitigation but is committed to ensuring that these projects are efficient and provide the greatest benefit to fish and wildlife. In most cases, this draft Comprehensive Evaluation shows that this most recent BiOp and the region's investment in it are working.

Public power is pleased to see that most populations of ESA-listed salmon and steelhead are increasing and that population trends have seen improvement since the measures of this BiOp have been implemented. We believe that this is in large part due to the unprecedented collaboration between states, tribes, and the federal agencies that are supportive of the BiOp. The Comprehensive Evaluation shows that these partnerships in the science-based effort to

return greater numbers of salmon and steelhead to the Columbia and its tributaries have been productive.

The success of the BiOp, however, should not obscure the fact that any effort like this must be holistic. While the BiOp primarily addresses the hydro, habitat, and hatchery effects on fish, continued improvements must be made on the harvest front as this "H" continues to adversely affect salmon and steelhead populations. Additional work on selective harvest called for by the BiOp must be completed to better manage mixed-stock harvest and provide significant benefit to returning adult fish.

The draft Comprehensive Evaluation shows that the current operations scheme needs adjustment as high spill and flows can provide adverse effects on adult fish and are often needlessly wasteful. The report stated that adult fish passage survival for three Snake River ESUs over the last five-year period is less than expected. It appears that high spill and flow operations are a cause.

The draft Comprehensive Evaluation notes that high flows and high spill levels delay adult migration upstream and increase the incidence of fallback after fish have successfully passed dams. The Action Agencies must modify flows and the spill regime to assure that adult are not adversely affected while returning to their place of origin.

This document provides a comprehensive look at the excellent work being done to benefit salmon and steelhead. It also shows that best science should be applied to revise the spill regime in the BiOp that will be submitted to the court by the end of 2013.

Public power customers are proud of their investment in regional salmon and steelhead efforts and appreciate consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Bo Downen". The signature is stylized with a large initial "B" and a long horizontal line extending to the right.

Bo Downen  
Policy Analyst  
Public Power Council