



Public Power Council

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October 7, 2013

Mr. Will Stelle, Regional Administrator
NMFS Northwest Region
National Oceanic and Atmospheric Administration
7600 Sand Point Way NE
Seattle, Washington 98115

Re: Public Power Council Comments on Draft 2013 FCRPS Biological Opinion

Dear Mr. Stelle:

Thank you for the opportunity to comment on the NOAA Fisheries' Draft 2013 FCRPS Biological Opinion. The Public Power Council (PPC) represents over 100 consumer-owned utility customers of the Bonneville Power Administration (BPA). As the primary customers of BPA, PPC members fund regional fish and wildlife mitigation efforts totaling approximately \$800 million annually and have a vested interest in ensuring these efforts are efficient, cost-effective, and based on sound science. PPC appreciates the tremendous effort undertaken by NOAA Fisheries in satisfying the court's order to evaluate the efficacy of the BiOp and ensure certain measures within it are reasonably certain to occur. The regional investment for salmon and steelhead in the Columbia River is working and targets are being met. This Draft 2013 FCRPS BiOp continues the region on its successful path and we are largely supportive of its continued implementation.

Passage improvements and operations decisions guided by the BiOp have increased survival for migrating salmon. Subsequently, all eight of the federal hydro projects on the mainstem of the Columbia and Snake Rivers are close to, if not already meeting the BiOp's survival goals. In addition to the positive passage and operational effects on salmon, by detailing future habitat actions, NOAA Fisheries has both satisfied the court's order and will provide measurable benefit to fish in the estuary and tributaries.

Sound, independent science has been a hallmark of these recent BiOps and this latest draft is no exception. This is critical in decision making and program implementation, as this effort is

largely funded by regional ratepayers of public power and should be as effective and efficient as possible.

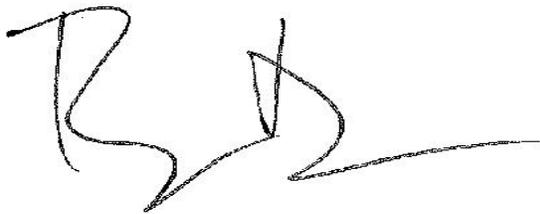
While this Draft BiOp is largely a positive effort, we believe that NOAA Fisheries should have affirmatively discussed why more aggressive actions, e.g., dam removal, flow augmentation, reservoir modifications, are unnecessary. Under current conditions where survival goals are being met, RPAs are being achieved, jeopardy is being avoided, and stocks are trending toward recovery, these types of measures are not necessary. A clear connection should be made between the fact that the BiOp is working and the subsequent unnecessary nature of these measures.

In addition, we believe the BiOp should discuss the spill operations in greater detail. The duration and volume of the spill regime outlined in the BiOp targets times during which fish are migrating in the river. This “smart spill” provides great benefit to fish while also limiting unnecessary loss of a non-carbon emitting generating resource. Further calls by some parties to spill in excess of current levels (which already exceed Clean Water Act levels) can cause gas bubble trauma in salmon and cause adult fish to “fall back” after passing projects, thereby delaying their return to spawning grounds. The spill regime outlined in the draft BiOp is supported by sound science and should be given a chance to work.

As evidenced by the latest runs, we have seen that the regional efforts of the past two decades are working. This supplemental draft BiOp continues this good work and clearly achieves the goal of ensuring that the continued operation of the FCRPS will not jeopardize listed salmonids. In doing so, it also satisfies the specific issues raised in Judge Redden’s 2011 remand order.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bo Downen', with a long horizontal flourish extending to the right.

Bo Downen
Policy Analyst

Cc: Bruce Suzumoto, NOAA Fisheries
Lorri Bodi, Bonneville Power Administration

Sarah McNary, Bonneville Power Administration
Rock Peters, U.S. Army Corps of Engineers
David Ponganis, U.S. Army Corps of Engineers