

DATE Feb. 10, 2010  
TO Northwest Power and Conservation Council  
FROM Charles Pace<sup>1</sup>  
RE Comment on Bitterroot River Subbasin Plan

This memo responds to the council's request for comments on the Bitterroot Basin Subbasin Plan, which, if adopted as the Council proposes, could result in Bonneville Power Administration paying for projects such as acquiring and improving habitat for fish and wildlife, boosting fish production, and funding research for the Bitter River system.

So far as I am aware, no hydroelectric projects are sited in the Bitterroot River subbasin. And, there is no indication in the assessment provided in the subbasin plan that populations of bull trout or any other sensitive species of fish, wildlife or plants have suffered any adverse impacts of hydroelectric projects.

Instead, the adverse impacts that have occurred may be attributed to water diversions for agriculture, forest management practices, mining, and urbanization. In short, the plan suffers from a fatal flaw. With the exception of losses that may be attributed to transmission lines and distribution facilities,<sup>2</sup> ratepayers have no responsibility for protecting/enhancing fish and wildlife populations or for mitigating for environmental damages associated with non-hydro human impacts.

---

<sup>1</sup> By way of background, in addition to my interests as a "regional preference" consumer of electric power produced by the Federal Columbia River Power System, the Bitterroot River basin is adjacent to the upper Salmon River basin in Idaho. I own property in Challis, Idaho, have operated an economic consulting business from that location and have used the Bitterroot River on a regular basis for recreational/aesthetic purposes, canoeing, camping, hiking and skiing. I also have long-standing professional interests in the energy and natural resources of the Clark Fork-Pend O'reille River basin, which the Bitterroot (and Blackfoot River) are tributary to, and in assessing relative responsibility for adverse impacts on water quality/quantity and other natural resources, including fish and wildlife, hydroelectric generating assets sited downstream vis a vis water diversions for irrigation and for domestic and municipal purposes, continuing release of hazardous wastes from mining, population growth and urbanization, and other human-caused impacts.

<sup>2</sup> My understanding is that Missoula Electric Cooperative provides service to electric consumers from the northern portion of the Bitterroot subbasin to the Idaho border. Northwestern Energy, which receives FCRPS power from interconnections a high voltage transmission line (500 kV) Bonneville operates as part of its main grid, operates two power distribution lines (161 kV) that run from Missoula to Hamilton, Montana with smaller lines (69 kV) providing local service to Lolo, Montana and other communities. The subbasin plan doesn't address the impacts on fish and wildlife of these lines or facilities.