

**PPC Recommendations to Amend the
Northwest Electric Power and Conservation Planning Council's
Mainstem Plan**

June 15, 2001

Recommendation I. The Council should be assertive in fulfilling its obligations regarding management of the Federal Columbia River Power System (FCRPS).

The Council, in representing the four Northwest States, has an important role to play in setting priorities, establishing an overarching framework and making funding decisions regarding the Columbia River fish and wildlife programs and power system.

A. The Council's Mainstem Plan, the Federal Agencies and the BiOp

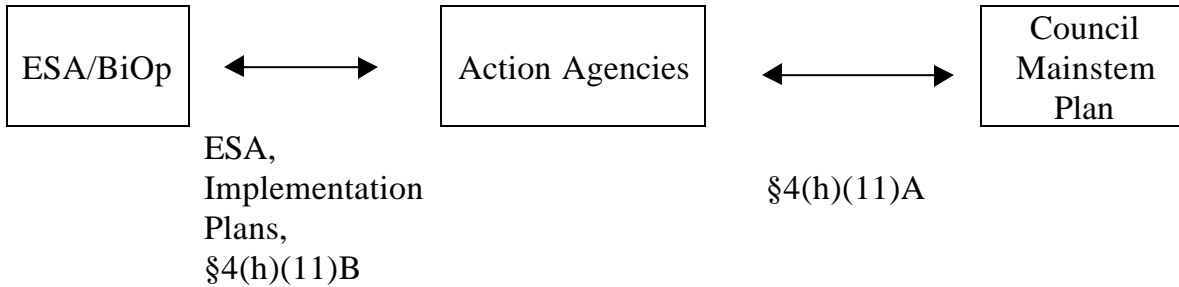
It is not helpful to have dueling plans for operation of the FCRPS. PPC would therefore like to see all the Federal agencies take the Act into consideration regarding operation of the FCRPS. The Act provides a clear mandate to balance power and fish and this should be an integral feature in the management of the FCRPS.

The Council can help fill a void in the ongoing management of the Columbia River by ensuring key provisions of the Act are implemented and by facilitating better coordination and integration of federal and non-federal mainstem efforts (both fish and power). Some federal agencies have ignored or denigrated the Act and Council participation in mainstem issues and there has been considerable ambiguity about the relationship between the Council and the federal agencies.

PPC suggests that Section 4. (h)(11) of the Act may give the Council and action agencies a logical basis for integrating the Mainstem Plan with the Endangered Species Act (ESA) and the Biological Opinion, via the Implementation Plans now being developed by the federal agencies.

Section 4. (h)(11)(A) requires the federal action agencies to exercise their responsibilities consistent with the purposes of the Act, while Section 4. (h)(11)(B) requires these same agencies to consult with NMFS and others and coordinate their actions to the greatest extent practicable. This may provide useful

guidance to all the relevant agencies to participate in and cooperate more closely with the Council’s efforts. The following figure shows this relationship.



B. Non-federal Projects in the Basin

Relative to non-federal projects in the basin, the Council should look for opportunities to increase coordination and cooperation between federal and non federal efforts (*e.g.* improvements at mainstem dams), but the Council should recognize that not all measures appropriate for federal facilities are appropriate for non-federal facilities and programs.

Recommendation II. The Council should carefully design its Mainstem Plan so that it makes sense and is effective from a “big picture” perspective.

A. Develop an Overall Mainstem Plan Framework

The Council should start with an overall framework for the mainstem plan that is designed to achieve a balance between fish and power obligations (as opposed to starting by adopting specific measures). This should be in the context of the role of, and limits of, the mainstem plan in increasing survival over the entire life cycle of salmonids.

The Council should focus primarily on the big picture, not specific measures by further developing the conceptual “framework” for addressing mainstem issues. The overall mainstem framework should include a rigorous analytic framework to evaluate alternative proposed measures including a quantitative analysis of the power benefits and biological benefits at each life stage. If possible there should be estimates of the likely increases in returning adults that the region can expect from each fish-enhancement measure included in the Program as well as expected decreases from power operations. This would be a logical extension of the excellent work performed by the Council’s power and fish division staff this year.

The framework should also provide for an analysis of the costs, (either financial, power or resource consumption such as water volumes) and estimates of the inherent uncertainties that each action entails along with a risk assessment of the implications of these uncertainties.

PPC drafted a lengthy list of specific strategies and measures to recommend to the Council in this rulemaking. However, we have not included them in these recommendations because we encourage the Council to resist the calls to adopt specific measures and instead focus on the framework and clear biological objectives and priorities for mainstem passage measures.

- B. Include clear statements of biological and power system goals, objectives and performance standards.

The Northwest Governors recommended this but progress has been slow. Increased survival of salmonids (both upstream and downstream) through the mainstem should be a priority objective and this should be based on direct measurement and cost effectiveness rather than reliance on indirect measures of survival such as flow and spill.

If every fish-enhancement measure proposed for the main stem were accompanied by an estimate of adult benefit, it would allow the Council to better evaluate what return the region could expect from expenditures (like spill at the lower mainstem dams).

On the power side, one example of a pertinent goal would be to increase, where possible and cost-effective, the amount of generation at existing dams in the FCRPS to help resolve the region's resource deficit

- C. Include methodologies for assessing the degree to which proposed strategies and measures can be expected to achieve the goals, objectives and performance standards as well as measuring actual performance.

The development of methodologies for monitoring and evaluation need to be further refined in terms of both the reliability of the power system and survival of fish as a function of flow and spill.

New information and strategies regarding prioritization by species/stock, effectiveness of various measures (including barging and surface collection and bypass), use of stored water and power system operations should be considered in the rulemaking.

- D. Use cost-effectiveness applied to the goals, objectives and performance standards as the basic evaluation criteria.

Because the Act requires the Council to seek a balance between fish and wildlife mitigation and power supply, the use of cost-effectiveness can guide the Council on key issues such as considering how far to go in protecting and restoring natural functions in the basin. Inclusion of cost-effectiveness in the Mainstem Plan would be consistent with the Council's 2000 Program as demonstrated in this quote:

“Actions taken under this program must be cost-effective and consistent with an adequate, efficient, economical and reliable electrical power supply.” (2000 Columbia River Basin Fish and Wildlife Program, Basinwide Provisions, Vision for the Columbia River Basin)

One important and timely application would be to improve the efficiency of spill and flow measures to obtain the greatest increase in survival for the least water used.

- E. Tailor the Mainstem Plan so that it effectively contributes to
1. the federal Implementation Plans for the 2000 Biological Opinion and
 2. ensuring the region of an adequate, economic, efficient and reliable power supply.

The Council can avoid creating a “do-nothing” document by working with the federal agencies to ensure that the Mainstem Plan is designed to be used and useful to the federal agencies in implementing the Biological Opinion in the most effective manner possible. In particular, PPC recommends the Council assign a high priority to improving the effectiveness of the performance standards in the Biological Opinion.