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Re: 1 - NWPPC, Columbia River Basin Fish and Wildlife Program, Notice of Request for Recommendations: Mainstem Plan (document 2001-4) March 14, 2001;  
2 - NWPPC, Analysis of Federal Columbia River Power System Operations on Fish Survival During Summer 2001, Council document 2001-14;  
3 - BPA Request for comments on updated technical analyses, affecting summer spill operations, FCRPS 2001 Hydro Operations Plan Update, June 14, 2001

I am submitting the following Recommendations and Comments as a concerned citizen, alarmed by many of the 2001 operations decisions taken by BPA, NWPPC and other agencies entrusted with the care of the Snake and Columbia River systems. Not all comments will apply to all referenced review requests.

I recently visited Lower Granite Dam, including the juvenile fish facilities. I received an excellent tour, and I am very disturbed by what I found. The current status of the Snake River is something to shame us all. Maximized transport of migrating juvenile salmonids is a ringing admission that the river no longer serves as functional habitat for the young fish. The way the hydro system is being operated, there is no river between the Lower Granite and Bonneville Dams, as far as smolt are concerned. These fish have no habitat.

ESA listed Salmon and Steelhead stocks can never be restored without habitat.

NMFS predicts between 96 and 98% loss of juvenile Snake River Fall Chinook this year due to maximized power generation, low water conditions and transport stress. "Normal" loss with spill is about 80%.<sup>1</sup> The marvelous return of adult Spring Chinook this year is mostly due to bountiful flow and spill provided by flood conditions of 1996. We must, even in drought years, use some Snake River water to provide flow and spill for fish; we can not, in good conscience, take all the water for human use. We can still make changes to benefit this year's miserable juvenile fish.

Water is the stuff of life, not of profits and careless power consumption. We must first maintain the river as functional habitat for the creatures that, unlike us, have lived in it since time immemorial. Our responsibility is to restore the rivers and the Salmon.

Please, operate the Snake River so the fish may survive in it.

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<sup>1</sup> - Sources: See Comments 3 and 13 below.

## ***Recommendations and Comments***

We are experiencing a fish emergency, regarding the potential destruction of this year's entire run of ESA listed Snake River Wild Fall Chinook migrating juveniles. We need to be able to declare an immediate fish emergency, beyond the encumbered, endangered ESA. Idaho Power must be required to release water from the Hell's Canyon Project – the fish need water. Elimination of Habitat is illegal.

- 1) I strongly agree with the following NMFS statements:<sup>2</sup>
  - “Immediate steps are needed to reduce risks to salmon and steelhead survival. ...
  - [We recommend that any particular corrective] action restores or acquires potentially productive habitats that will be largely self-maintaining after the activities are complete. ...
  - The action addresses imminent risks to survival of one or more species. ...
  - The action addresses a habitat enforcement issue and results in the protection of aquatic habitats.”
  
- 2) I strongly support NMFS's recent efforts to obtain releases of water from the Idaho Power's Hell's Canyon dams. NWPPC, BPA and the other Agencies should support NMFS in this effort.
  - ✗ 75% of Snake River Fall Chinook Salmon habitat was lost in 1958 with the construction of Brownlee Dam. Idaho benefits greatly from the Salmon and Steelhead runs that remain. Idaho must at least release adequate water to support the fish.
  - ✗ The summer spill requirements for the lower Snake River dams, called for in the 1995 and 2000 BiOp, are an inadequate compromise of conflicting interests and impoverished resources.
  - ✗ Dworshak Dam alone cannot adequately moderate the Snake River flows and temperatures.
  - ✗ Temperatures are already 18 deg. C at Lower Granite Dam and rising sharply.
  - ✗ 80-85%<sup>3</sup> of juvenile Fall Chinook will die just trying to migrate through “Granite Lake.”
  - ✗ An EIS for the Hell's Canyon Project, were someone to propose its construction today, with the current configuration, ownership and operation, would be so far out of current norms as to be laughable. Idaho Power's ownership and control of effectively the entire Snake River above Hell's Canyon Dam is not consistent with today's understandings of appropriate environmental stewardship. The “custody” of Snake River water can not be held in private, corporate hands any longer.
  - ✓ Fish passage must immediately receive reasonable water releases from the Hells Canyon Project.
  
- 3) For Salmon restoration, we must make adjustments in all the “H's,” Habitat, Hatchery, Harvest and Hydro, all of which are in Human hands.
  - ✗ Barging fish is not an adjustment to Hydro operations (other than financially). It serves only to justify even greater power generation. It hurts Snake River fish.
  - ✗ Some of the extra money made by maximizing power generation is to be used partly for “off-site remediation efforts.” This means raising fish out of the river environment. This is not an acceptable alternative to raising fish in a functional river.
  - ✗ Eliminating Habitat is supremely unacceptable; it is illegal. A take of nearly 100% is also.
  - ✗ Using essentially 100% of the river water for Humans and 0% for fish survival is unconscionable. Not more than 80% of river capacity should be devoted to human use, i.e. at least 20% of average flow should be left in service to the river itself and the life within it.
  - ✗ Transported fish are permitted to be held in near concentration camp conditions for up to 5 days. This is a Salmon Holocaust.

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<sup>2</sup> Source: NWPPC, Findings on Recommendations, Section 7 (May 2001), Hi priority actions 2001-7, National Marine Fisheries Service Recommendation No. 54, pg. 331.

<sup>3</sup> Source: NMFS, “Expected Effects of 2001 Water Conditions...” Calculated from data in Tables 1 and 2, June 13, 2001.

- ✗ It is not true that the “No Spill Option” has no effect on Snake River runs. That comparison is between either 3 or 4 Snake River dams with no spill. Comparing the “No Spill Option” against in-river survival with average flows and spill, the loss is a staggering 50-94%.<sup>4</sup> (see, also, related Comment 13, below)
  - ✓ We must manage the river as a real river (we have forgotten what that is?) not only as a barge trail, a power and irrigation source, a people’s play pool and a cow toilet.
- 4) The NMFS 2000 BiOp appears to have succumbed to narrow regional economic, political and generally human pressure, rather than serving the fish as originally chartered. It must remain true to the concerns of its charges and speak strongly and clearly for the best interests of the fish. Many other Agencies affecting operations of the Snake and Columbia Rivers hydro-system have also been twisted into the exclusive service of a few specific Human interests. The entire region, including its environment, must be served equitably.
  - 5) The goal as regards restoration of endangered species is to do oneself out of a job. Not by the loss of the species, but by restoring self-sustaining conditions for life.
  - 6) Declaration of power-related emergencies must be moderated by limits, conditions and agency coordination more favorable to environmental concerns.
  - 7) We, Humans, Corporations and Governments, have endless resources in our creative capabilities, if not in our courage or honesty. Salmon have no endless resources anywhere today. We can find other solutions to our problems. Salmon can not.
    - ✓ We must reduce our dependence on hydropower.
    - ✓ Insurance companies often no longer insure houses built in flood plains. Taxpayers and fish must no longer insure power generation, irrigation, transportation, recreation and corporate profits obtained at the expense of the life of the river.
    - ✗ There is no glory in having a rich, powerful economy, if it can be sustained only by the destruction of all that it touches.
  - 8) Rather than a power shortage, we have the results of severely mismanaged power pricing and supply throughout much of the Western region. We also have an economy dependent on luxury and waste. We need to be developing a truly healthy, sustainable, environmentally inclusive economy. We can do that, but it may take some real thinking.
    - ✓ The “radically changing energy industry” accompanies a radically changing economy. Our regional long-term power plans can begin to define what this new economy will look like.
    - ✓ BPA and the other Agencies are in a unique position to re-vision and create Regional Health.
  - 9) I commend BPA on the demand reduction and extensive water and power buy-backs achieved thus far, also the spring water management to facilitate juvenile salmonid emergence and migration in the Columbia River, as well as any progress made on solar installations.
    - ✓ More needs to be done.
    - ✓ Realistic, unsubsidized, unmanipulated prices for power are acceptable, as are conservation and advance warning of possible disruption of electrical service. Education of the public will be required, and in fact has begun.

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<sup>4</sup> Approximately 80% average loss for Hatchery SR Fall Chinook migrating in-river with spill, 90% average loss for all SR Fall Chinook migrating in-river with and without spill, 95% average loss for in-river Wild and Hatchery SR Fall Chinook migrating without spill, for 1995-2000. With estimated additional 76% transport-related loss, an estimated total loss of 98.8% of Wild and Hatchery Snake River Fall Chinook migrating without spill and with transport this year, 2001. – Sources: CBR-DART at <http://www.cqs.washington.edu/dart/esu.html>; NMFS “Expected Effects of 2001 Water Conditions...” June 13, 2001; NWPPC “Analysis of 2001 FCRPS Operations...” March 28, 2001.

- 10) BPA has oversold generating capacity by 3000 MW more than can be produced even in good water years, and outrageously high spot market prices for electricity offer potential profits, tempting BPA to maximize power production. These mistakes, temptations and delusions must be avoided.
- 11) It might not be possible to meet the requirement of Section 4(h) of the Northwest Power Act, that NWPPC must “protect, mitigate and enhance fish and wildlife while assuring the Pacific Northwest an adequate, efficient, economical and reliable power supply,” with hydropower in place.
- 12) I support installation of solar panels on residential, commercial and industrial roofs throughout the Western region, tied into existing building circuitry and the grid, and also the development and widespread use of fuel cells.
- ✓ In many areas, the highest demand for electricity correlates directly with hot, sunny conditions.
  - ✓ Ratepayers and the environment would profit greatly.
  - ✓ This huge distributed power source is not encouraged by large power producers since they likely would not profit by it. Public power must be an exception and support it.
  - ✗ Developing larger and longer transmission systems proportionally increases system instability.
- 13) The position reflected in much of BPA’s language does not promote a responsible relationship with the environment. The priority of finance and hydropower generation above all else is inequitable. Quotes from BPA’s current Request for Comments, Background and Summer Spill, follow:
- ✗ “Spill operations are only being considered when certain emergency criteria related to power system reliability are met.” (power first; fish, maybe never)
  - ✗ “BPA and the other agencies intend to return to normal fish operations next year if there is sufficient water supply.” (fish come in last again; and there will still be no summer spill )
  - ✗ “It is difficult to establish a fixed regime without periodic adjustments because the hydro system is so close to the edge of being unable to provide any spill within the reliability and financial criteria.” (something needs to be revised in operations, expectations and dependency)
  - ✗ “The National Marine Fisheries Service's biological analysis seems to suggest that summer spill has no definitive benefit to ESA listed stocks [Snake River Fall Chinook] - system survival is estimated to be 3.8 percent regardless of spill levels.” (this is false; to be meaningful, “No Spill” must be compared with average or full spill conditions, not the “Full BiOp Spill,” which is already effectively no spill on the Snake River)
- For SR Fall Chinook (combined Hatchery and Wild, with spring spill and no summer spill) average survival is about 10.2%.<sup>5</sup>
  - Survival with “No Spill” is about 2.6%. This is an average survival decrease of 74%.
  - Survival of Hatchery Fall Chinook migrating with spill<sup>6</sup> is closer to 20%. So, the survival decrease from “Spill” to “No Spill” is on the order of 85%.
- ✗ “The financial value of summer spill is substantial. It is also possible that other operations could provide better biological benefit.”
- 14) Finally, we must address the lethal environmental effects of excessive human population. We already have too many people to cohabit appropriately with the resources and other life of the planet. We must use our capabilities to care for more than only humans. This is a difficult but essential political, economic and social topic. Change may have to come slowly.

<sup>5</sup> NMFS Hydro Program, June 13, 2001, Draft “Expected Effects of 2001 Water Conditions and Alternative Spill Operations...”  
 --- From Table 1, pg. 6, SR Fall Chinook (combined hatchery and wild) “Multi-Year Average Survival (and Range) Est’d in 2000 BiOp under a range of water conditions” is 10.2% [0.5-16.4].  
 --- “Est’d Survival with Full BiOp Spill,” i.e. no spill at 3 SR collector dams, is 3.15%, which is now common for the summer migration, having had no spill since at least 1995. For “No Spill,” survival is 2.6%.

<sup>6</sup> Source: CBR-DART, for 1998, 1999, 2000, at <http://www.cqs.washington.edu/dart/esu.html>. --- For Hatchery SR Fall Chinook released in mid April, migrating in-river with spill at all dams, survival is around 20% [13 - 28].