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April 3, 2008

Mr. Mark Walker
Northwest Power and Conservation Council
Portland, Oregon

Dear Mr. Walker,

On behalf of the Northwest Sportfishing Industry Association, (NSIA) I am writing to provide comments on Program Amendments to the Council's Fish and Wildlife Program. NSIA is an umbrella organization consisting of sport fishing businesses-manufacturers, manufacturers representatives, wholesalers, retailers, guides, charters, hotels and marinas, as well as sport fishing associations from around the northwest and individuals who are dedicated to healthy fishery resources and their habitats. A partial listing of our membership is attached to this communication. The sport fishing industry employs nearly 31,000 in the northwest, and generates over \$3 Billion in economic benefit to our states, in service to the 1.7 million adults purchasing fishing licenses annually. We appreciate the opportunity to comment and improve the program, and trust that the comments from the Sportfishing Industry, our allies and customers will be taken seriously.

1. Continuity with past amendments

The Council's previous programs have specified some important directions that should remain and be enhanced by the next program. In particular the application of adaptive management, ecosystem management and doubling the runs of salmon in the Columbia should remain as significant guidance in the program. We therefore recommend that specific language be included to retain the emphasis on these prior goals.

2. Fish Passage Center

The Fish Passage Center has been a valuable resource available to the members of NSIA as well as being a source of important information for the general public and fish management community. We are well aware of the so called controversy and upon examination of the allegations directed against this project we find little merit in changing the administration and management of the FPC. We recommend that you consider enhancing the regionally valuable science role of the FPC to include monitoring Steelhead in the smolt monitoring program. This is a significant lack of information that is badly needed and we are deeply troubled that it has not been included before this time. We also strongly recommend that the funding level for the FPC be adequate for the mission it is created to accomplish. We have

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observed the classical diminution of its funding that appears to be in response to the allegations made by the power industry against the performance of the FPC. Although the FPC has gotten high marks for its work performance by all of the audits done as directed by the Council, the funding has been slowly eroded to the point of damaging the performance of the Center. It is time to move ahead and support the Fish Passage center, and the sorely needed functions it provides to fishery managers and the region, so that its productivity is not jeopardized in the future. We also recommend that some form of mediation or conflict resolution be used to get at the root causes of the controversy and remedial action is promptly taken to silence the unsubstantiated criticism.

3. Integrate the Council's Program with the BIOP Program

The region is plagued with confusion and controversy because of the lack of strong coordination of the requirements of the Endangered Species Act and the Northwest Power Act. Specific measures are required to implement each of the Acts and in practice many efforts overlap. We are concerned that due to the more immediate and less flexible constraint of the ESA the measures that are needed for the mitigation of the presence of the Federal Columbia River dams are not adequately funded and needed efforts arising from the mandates of the Power Act are not approved. We recommend that the NPCC and the Federal agencies make a deliberate and substantial effort to integrate the ESA actions into the Program. We suggest that the Biological Opinion, the sub basin plans, and the habitat recovery plans be the basis for sizing the program effort and the means of developing measures that will accomplish the requirements under both Federal Acts.

4. Develop Information Concerning the Economic Benefits of Sportfishing in the Columbia Basin

The Council has made a significant effort to document the economic benefits to the Region of the stable and economical supply of power from the FCRPS but has not done the equivalent for the evaluation of the impact of the availability of fish and wildlife resources on the Region's economy. Clearly the substantial fisheries of the Columbia River make a large contribution to the Region; however, the Council has never conducted or supported the collection and analysis of economic data that would document the contribution of the fisheries. In fact it is worth noting that the Council has in its history reviewed and critiqued many efforts to document various aspects of the economic benefits from the fisheries but has never been a source of objective professional analysis of the benefits due to fish and wildlife use by the Region. This is a glaring oversight on the part of the Council. Conversely, the Council has economists available to evaluate the economic impact and benefits of the power supply. It is time to correct this obvious imbalance since much of the policy dialogue in the Region revolves around the economic issues.

5. Conduct an Objective Study of the Costs and Benefits of Removing the Four Lower Snake River Dams

No other issue has been as divisive and polarizing as the suggested removal of the four Snake River dams. While there have been several studies that attempted to document the benefits and costs of removal, none has been viewed as an unbiased evaluation or has served as a model for

guidance for public policy. Instead we have seen positions adopted by various interest groups and political leaders in extreme opposition to each other. The Council would serve the Region well if it were to commission a thorough study of the issue to answer the following questions:

What are the costs of removing the dams and how will the project be funded?

What infrastructure will need to be replaced and added to provide adequate transportation of material and commodities with the elimination of commercial barge services?

What are the alternatives available to replace the lost power production and at what cost?

What are the impacts on irrigated agriculture and how will irrigation be replaced or losses compensated?

What are the ecological benefits of dam removal and in particular what benefits to ESA listed species will occur?

What current program costs, both operational and capital, can reasonably be expected to discontinue if the Four Lower Snake River Dams were removed, and what savings are generated?

What are the economic benefits of fish and wildlife restoration due to the removal of the dams with a particular emphasis on the benefits of a substantially increased recreational fishery?

We strongly recommend that the Council pursue such a study. For far too long the Region has been without such an objective study to guide the development of policy. The fish survival studies continue to document the adverse impact of these dams and in spite of substantial evidence the conclusions are rejected because of alleged economic impacts. The picture is not clear however and we recommend that the Council ask the National Academy of Sciences to establish a study group to prepare a thorough analysis of the dam removal issue. It is long overdue to put this issue to rest. The Region cannot move ahead in a deliberate way unless and until such a study is done and thoroughly vetted throughout the Region. The Council is in a unique role in the Region and this would be a substantial contribution to the Region's future. We have already seen the functional extinction of the Redfish Lake Sockeye and Snake River Chinook continue to struggle with little real progress toward recovery.

We are willing to abide by the results of a thorough and unbiased study of the removal of the Snake River dams but we are not willing to accept the continued indifference of the Region's leadership toward the resolution of this issue.

6. Evaluate the Feasibility of Alternative Approaches to the Current Methods of Project Oversight and Implementation

The current method of managing the selection and supervision of projects within the program appears to be an outgrowth of BPA's process for assigning and supervising contracts. While this is one alternative it may be better to adopt a model like the US Fish and Wildlife Service's grant in aid program to the states. The advantage would be its reduced administrative costs while consistently funding the long term aspects of fish and wildlife management. In reality much of the Council's program does not change from year to year nor should it. This presents an opportunity to significantly reduce the costs of supervision of the projects within the program.

We also wish to recommend that the Council explore the possibility of establishing a different method of managing the funding of the program. Our concern is derived from the blatant use of the funding of projects to coerce the state agencies and tribes to adopt certain policy decisions particularly associated with the impacts of ESA implementation. A trust fund that is administered by an independent board of directors is recommended. The funding for the trust would be collected by BPA based on its rate case provisions and by establishing a trust it would build a firewall between the obvious conflicts that BPA now has in attempting to provide power while also mitigating for the FCRPS impacts. The control over this source of mitigation funding by the Bonneville Power Administration has translated into undue and inappropriate influence over the Fish and Wildlife program. We are dismayed at the current state of affairs and if this recommendation is not appropriate we recommend that the Council implement its own findings to correct this serious conflict of interest.

7. Improve and Expand the Social Science Input to the Program

The Council places great emphasis on biological science in its supervision of the program but there is a very significant lack of an equivalent emphasis on social science. Most fish and wildlife management agencies have accelerated the inclusion of human dimensions information into their management and policy decisions. Information derived from polling of public opinion, demographics, economic impacts, etc. is much more widely used to assist the decisions and guidance of these programs. We observe that the Council does little collection of information about the human dimensions of its programs and tends to rely on anecdotal evidence of trends and goals of the population of the Columbia Basin. We think that a small investment of time and money would go a long way toward better informed decisions.

We are also very concerned about how the public is expected to interact with the Council's efforts. We acknowledge that the general public is allowed to provide written and oral comments but there is a significant lack of outreach to the general public and the opportunities to comment are limited. We note that if we were to provide in person testimony to the Council about these comments we would have to travel to Montana to do so. This places a significant barrier between the Council and the general public that has an interest in the Council's efforts.

This is of particular concern to the lower river communities. Few if any attempts are made to provide accessible opportunities for the general public to interact with the leadership of the Council. This leads to domination of the process by established interest groups with little opportunity for the unaffiliated person interested in the direction of the program.

8. Develop Recommendations for Adapting to Climate Change

We applaud the Council's efforts to date to anticipate the effects of global climate change and we recommend that the Council develop a strategic plan for future guidance for the region. This is an opportunity for the Council to provide information to its many cooperators about how to cope with the long term changes and their impacts to fishery resources that are anticipated. This is a significant opportunity for the Council to provide leadership to the Region since many of the agencies will not devote adequate resources to the thorough analysis required to provide sound direction for the future. There are large implications for the flow of water in the Columbia and the Council is in the unique position once again to integrate the needs of both power supply and fish and wildlife. No other entity is so uniquely qualified to provide such guidance.

9. Develop Recommendations for Adapting to Population Growth and Land Use Changes in the Basin

There have been many forecasts of the expected increase in the human population of the region. If these predictions are true there will be significant impacts from the water use and development needed to support this expansion. We recommend that the Council authorize a strategic analysis of the effects of this expansion and make recommendations for efforts to accommodate the increased impacts of population and development. There are many aspects to this problem and currently there is an opportunity for leadership to install long term programs to provide a sustainable approach to the problem. Much is being done but we see a great opportunity for coordination and guidance of the many entities that apply their efforts.

10. Sturgeon Management

Sturgeon is a species that lives in both fresh and salt water, and once traveled inland all the way to the Kootenai River in Montana. The primary limiting factor for the productivity and health of the species is the fragmentation of the populations caused by the construction of the dams in the basin. Most of their historic range has been inundated, and the spawning and rearing habitat is severely degraded. Lack of flow, temperature regimes, predators (fish and marine mammal), and lack of food sources are all limiting factors caused by Dams. Pollutants and contaminants are also entrapped by the dams, and are contributing to reproductive and other difficulties. As such, the area below Bonneville dam is one of the last highly productive spawning and rearing habitats for White Sturgeon populations in the United States. Given the decimation of much of the sturgeon's historic spawning, rearing and migratory habitat, we strongly urge the council to suggest funding for the following projects:

- Young of the year surveys annually below Bonneville Dam. The reproductive success of the brood stock sturgeon in the remaining few river miles of appropriate habitat available to sturgeon are tied to suitable flows and river temperatures during late spring and early summer. Spawning surveys must be conducted every year to build a data base that can be tied to river flows and temperatures to ensure the current and future reproductive success of this unique remaining habitat. Given the Bonneville Power Administration's insatiable appetite for power sales over fish health, this data is essential to ensure adequate flows are provided during critical spawning time.

- Trawl and Haul. We do not support the funding of a program of removing sturgeon from below Bonneville Dam to provide for fisheries above Bonneville dam that is not tied to a program of protection and benefit for the population below Bonneville Dam. This program robs lower river fisheries to pay a debt for the Bonneville Power Administration and is unsupportable.
- Instead, we suggest that a request for proposals is put out for a sturgeon supplementation facility that is funded by Bonneville Power Administration. Clearly the populations above Bonneville are severely limited by dams, and a supplementation program, perhaps run by a Tribal entity is necessary.
- Marine Mammal control program. It is the existence of Bonneville Dam itself that is trapping the movement of spawning and rearing sturgeon. They are “sitting ducks” in an unfair battle with sea lions because of this river blockage. There are estimates predation of ten percent per year of brood stock sturgeon at the base of Bonneville dam by Sea Lions, and an unknown impact on legal and sub legal size. There is a clear mitigation responsibility here.
- Given that the few miles below Bonneville are one of the last quality habitats for white sturgeon, a study of the carrying capacity, a survey of the number of brood stock and life history behavior is necessary to ensure adequate future protections. The states of Oregon and Washington could be contracted for these surveys.

We are pleased to offer our recommendations to you and offer our assistance as you deliberate your amendments to the program.

Yours truly,

Liz Hamilton, Executive Director
Northwest Sportfishing Industry Association

Encl: NSIA membership

NORTHWEST SPORTFISHING INDUSTRY ASSOCIATION



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