

State, Federal and Tribal Fishery Agencies Joint Technical Staff

*Columbia River Inter-tribal Fish Commission
Idaho Department of Fish and Game
Nez Perce Tribe
Oregon Department of Fish and Wildlife
Shoshone-Bannock Tribes
US Fish and Wildlife Service
Washington Department of Fish and Wildlife*

October 18, 2004

Ms. Judi Danielson, Chair
Northwest Power and Conservation Council
450 West State
PO Box 83720
Boise, ID 83720-0062

Mr. Doug Marker
Northwest Power and Conservation Council
Fish and Wildlife Division Director
851 SW 6th Ave., Suite 1100
Portland, OR 97204-1348

Dear Ms. Danielson and Mr. Marker:

Re: November 9-10 Flow-Survival Symposium

It is our understanding that the Northwest Power and Conservation Council (Council) and NOAA Fisheries are planning a symposium for November 9 and 10, 2004 to examine how changes in operations of Libby and Hungry Horse dams may affect flow and survival in the mainstem Columbia below Chief Joseph Dam. We concur with the need for federal, state, and tribal scientists to explore the biological implications of changes in Libby and Hungry Horse operations during summer as anticipated in the Council's 2003 Mainstem Amendments to the Columbia Basin Fish and Wildlife Program (Program) and as discussed in the July 19, 2004 letter from NOAA Fisheries to the Council. We are concerned, however, about the Council organizing and structuring this symposium without the formal involvement of all of the regional fish managers with vested interest in this issue.

A strong body of work from the regional fish managers and the National Research Council exists on the topic of flow, survival and incremental water withdrawals in the Columbia River Basin State, Federal, and Tribal Anadromous Fish Managers Comments on the Northwest Power Planning Council Draft Mainstem Amendments as they Relate to Flow/Survival

Relationships for Salmon and Steelhead, January 2003; The effects of mainstem flow and water velocity on salmon and steelhead populations of the Columbia River, Presentation to the National Research Council, IDF&G, ODFW, USFWS, FPC, March 2003; and Managing the Columbia River: Instream Flows, Water Withdrawals, and Salmon Survival, Committee on Water Resources Management, Instream Flows, and Salmon Survival in the Columbia River Basin, National Research Council, 2004). These works should be the starting point for framing the workshop (we have attached the former two documents and the web link for the latter document for your record. Link to NAS report: <http://www.ecy.wa.gov/programs/wr/cr/crinsr.html>).

The Council should formally consult with the affected fishery managers on the objectives, specific questions, analytical methods, and format of the symposium. The current list of questions posed for the symposium is extremely narrow in scope, and appears to be directed at addressing the questions based on an incremental analysis of the effects of flow on juvenile salmonid survival utilizing SIMPAS and other models. We believe an examination of these issues using only these deterministic single life cycle models is not sufficient, as these models are inadequate to address the complexities and uncertainties of the effects of summer flow on the entire life cycle survival of anadromous fish below Libby and Hungry Horse dams. Applying this approach, which is parallel to the contested method used by the Council, NOAA Fisheries, and Action Agencies to evaluate effects of summer spill reductions, will only promote additional controversy, resulting in a lack of regional support of findings from the symposium. The Council should strive to avoid creating additional controversy by facilitating a broader technical scope. Also, failing to include in the rigorous evaluation of changes in Libby and Hungry Horse operations the effects on resident fish above and below projects leaves out a decisive element needed for a comprehensive evaluation as is anticipated in the Council's Program.

Based on our review of the announcement for the symposium, it appears that symposium participants will be asked to share their responses on the questions that will be summarized in a briefing document developed by the Council. We recommend that the symposium be patterned after a decision analysis framework using a "weight of evidence" approach whereby the strengths and weakness of the various factors affecting survival including flow are evaluated for each life stage of fish below the projects. We specifically recommend that the format used in the Comparative Survival Study workshop conducted February 11-13, 2004, be followed to provide a scientifically sound basis for assessing effects of changes in Libby/Hungry Horse project operations on fish.

We stand ready to assist the Council in planning and conducting this important symposium that will increase the region's collective understanding of the implications of the Council's Program on fish and hope that our recommendations are useful in formulating the symposium. We agree that changes to the operations of Libby and Hungry Horse reservoirs need to be comprehensively examined to make sure that the modified operations proposed under the Council's program do not increase the risk to Columbia River anadromous or resident fish, particularly pursuant to ongoing FCRPS consultation and expectations for further recovery planning. Flow augmentation is an extremely important component of anadromous fish recovery and restoration. Any changes to operations of Libby and Hungry Horse need to be comprehensively evaluated for compatibility with the NOAA Fisheries and USFWS BIOPs and to assure that the modified operations do not impede the progress towards recovery, achieving biological objectives and restoring sustainable fisheries.

Sincerely, STFA



Dave Statler, NPT



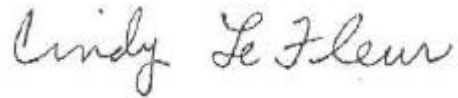
Ron Boyce, ODFW




Keith Kutchins, SBT



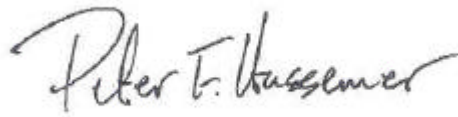
Rob Lothrop, CRITFC



for Bill Tweit, WDFW



Howard Schaller, USFWS



for Sharon Kiefer, IDFG

Cc: Bob Lohn NOAA Fisheries