55-0020

JAN 2 9 2004

Kuehn, Ginny - DM-7

From: Jim Johnson [mgr@bbec.org]
Sent: Monday, January 19, 2004 10:28 AM
To: BPA Public Involvement
Cc: info@pplpwr.org
Subject: Summer Spill

Dear Mr. Wright:

I am writing to ask that you support reducing the summer spill at BPA's hydroelectric facilities on Northwest Rivers. These requirements cost ratepayers $80 million per year because of forgone generation sales with no appreciable benefit to the salmon they were designed to help. While some healthy species do benefit, almost 50 percent of these fish are later caught and eaten. In fact, the Northwest Power and Conservation Council estimates only 15 threatened adult salmon were aided by summer spill in 2003.

The Northwest currently has the highest unemployment in the nation, brought about, in part, by the rising cost of electricity. Ratepayers need relief, and you can help. Reducing summer spill for 2004 is a responsible action to take to balance the needs of your constituents for affordable electricity with fish restoration efforts that work.

Thank you for your consideration of this request.

Sincerely,

James Johnson, Manager

Big Bend Electric Cooperative

Gerry K.

NRU

55-0058
JAN 29 2004

(503) 233-5823
Fax (503) 233-3076
jsaven@pacifier.com

Northwest Requirements Utilities

825 NE Multnomah, Suite 1135
Portland, Oregon 97232

January 27, 2004

President George W. Bush
The White House
1600 Pennsylvania Ave., N.W.
Washington, D.C. 20500

Re: Summer Spill for Salmon on the Columbia and Snake Rivers

Dear President Bush:

Northwest Requirements Utilities (NRU) is an association of 46 publicly and consumer owned electric distribution utilities serving over 455,000 customers throughout the Northwest. Our members rely upon the Bonneville Power Administration (BPA) as their primary or exclusive wholesale supplier of energy and transmission services, and they account for over 20% of the firm power sold by the Agency in the region. Energy prices are a key driver of the Northwest economy, particularly in the more rural areas where many of the NRU members are located. Unfortunately the Northwest continues to lead the nation in unemployment, while BPA's wholesale rates are about 40% higher than just a few years ago. Your administration has an immediate opportunity to help our economy while also providing environmental stewardship.

Our member utilities purchase power from BPA and as a result pay their fair share of the full cost of federal generation. One of the largest components of this cost includes funding for fish restoration efforts in the Columbia River system. Not including the one time cost effects of the 2000 – 2001 west coast price run up, fish and wildlife costs constitute 21% of BPA's base power rates. We strongly support fish restoration programs that are based upon sound biology and can demonstrate accountability for results in returning fish.

We commend the work of your administration helping revamp the fish restoration approach in the Northwest by pursuing aggressive and well reasoned initiatives including use of new technologies and participation at the local level. Your visit last year to the Lower Snake River dams, and CEQ Chairman James Connaughton's visit yesterday to Bonneville Dam demonstrate that ongoing commitment, and provide greater public exposure to the substantial improvement in the runs of salmon and steelhead.

However, there is one major river operations practice that is extremely costly and has negligible biological benefit for salmon runs listed under the Endangered Species Act. Spilling water over dams in the months of July and August in an attempt to pass fish in river is a wasteful practice that needs to be halted before the summer of 2004. Recent materials presented on January 21st by Federal agency officials to the Northwest Power

and Conservation Council show the annual revenue loss impacts of the summer spill program for July and August of $77 million.

The reported biological impact on ESA listed Snake River Fall Chinook for ending summer spill completely is 24 fish, and for all 13 Fall Chinook stocks less than 20,000, out of a combined run that exceeded 600,000 fish this year. Equally important, the federal agencies are recommending changes in mitigation programs that are expected to provide an additional 51,000 to 66,000 returning fish, and a price of only $1 million. These include a more aggressive program to reduce Northern Pike Minnow predation and an expanded Hanford Reach rearing plan.

In summary, by ending summer spill and saving up to $77 million per year, there is a compelling opportunity to improve the Northwest economy through reduced electricity rates. We can simultaneously increase the number of returning fish, including ESA listed stocks, through much less expensive mitigation measures that have demonstrated biological benefit.

Therefore, we urge quick action by the Army Corps of Engineers, BPA, NOAA and any other parties to eliminate or significantly reduce the summer spill program. Such an approach makes economic sense and is consistent with the current biological opinion for the federal river system.

Thank you for your continuing leadership on these important issues. The NRU members recognize there is an opportunity to address and resolve the issue before the summer of 2004, and we stand committed to assist in any way possible to achieve this objective.

Sincerely,

John D. Saven
Chief Executive Officer

cc: Northwest Congressional Delegation
Northwest Governors
Northwest Power and Conservation Council Members
James Connaughton, Chairman, Council on Environmental Quality
Bob Lohn, Regional Director, NOAA Fisheries
Steve Wright, Administrator, Bonneville Power Administration
Bill McDonald, Regional Director, Bureau of Reclamation
Dave Allen, Regional Director, U.S. Fish and Wildlife Service
General William Grisoli, U.W. Army Corps of Engineers

Promoting Sensible Salmon Recovery

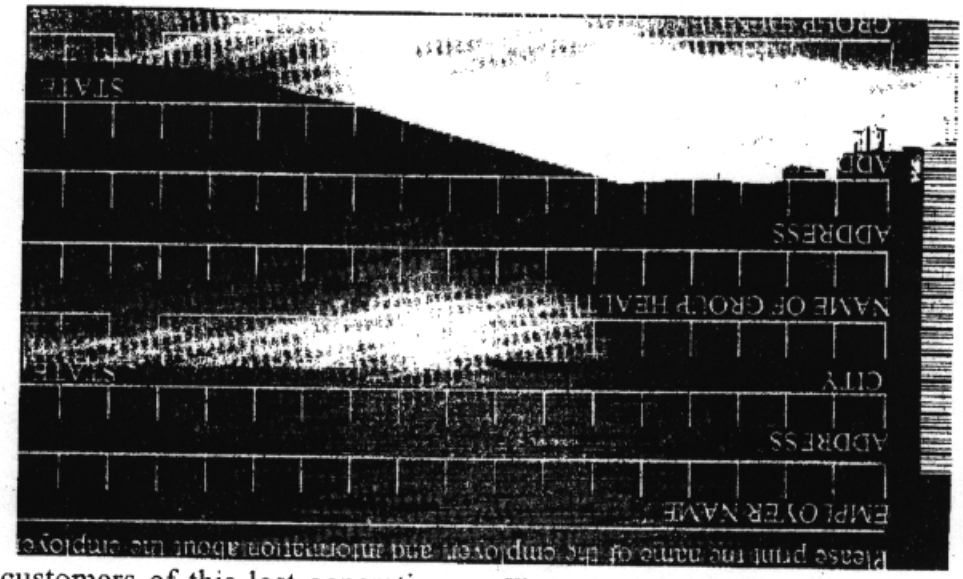
Dear Member,

Almost all of the electricity Clearwater Power Company provides is generated by the federal Columbia River power system and sold by the Bonneville Power Administration (BPA). So, the status of federally protected salmon in the Columbia and Snake River Basin is a critical issue to us.

Recent reports provide good news about these fish. The past three years have seen record returns of salmon past Bonneville Dam with the number of fish being three to five times the average. For the mighty Chinook salmon, there have been close to one million fish returning each year. Amazing numbers!

It may take several years for scientists to learn what these enormous returns mean for the long-term status of these fish. In the meantime, BPA and its customers continue to pay for large investments to ensure the health of these salmon and steelhead runs. About $600 million annually, roughly one-quarter of BPA's budget, is dedicated to fish and wildlife. For utilities like ours, that means that 10 to 15 percent of the retail rates you pay go toward this effort.

Because of these large investments and the importance of this issue, it is critical that every measure we take for salmon be effective. In July and August, federal river managers spill water *over the dams* instead of generating electricity with it in the hopes of helping juvenile salmon downstream. The cost to BPA's customers of this lost generation averages $80 million per year.



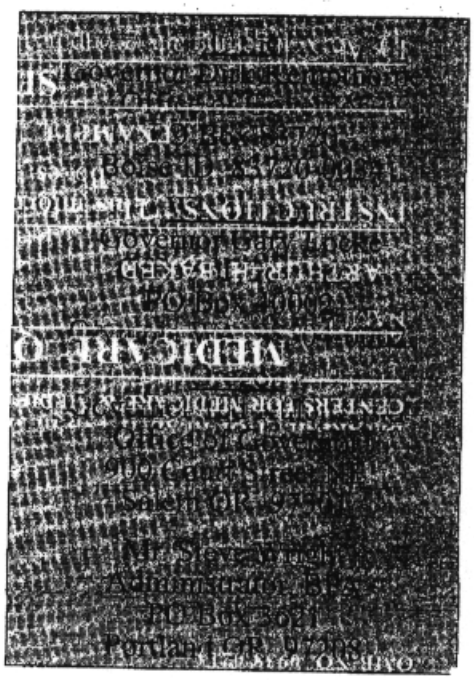
Water is spilled from dams on the Columbia and Snake river systems in the spring and summer to aid juvenile salmon. The spill costs rate payers $80 million a year.

A public statement this past August by BPA, the Army Corps of Engineers and NOAA Fisheries said, "the summer spill program, based on available evidence, appears to be excessively costly relative to the biological benefit provided."

State and federal river managers are reviewing this matter now. If they do not act quickly, it will be too late to arrange for changes to this wasteful operation by next summer. If you would like to request them to reduce this summer spill operation, you may want to write to your governor and the BPA administrator. Their addresses are on the right.

Sincerely,

Sandy Huling
General Manager



SS-0145
FEB 12 2004

Kuehn, Ginny - DM-7

From: AnonymousComment@somewhere.com
Sent: Thursday, February 12, 2004 9:44 AM
To: BPA Public Involvement
Subject: Comment on Summer Spill Analysis

Comment on Summer Spill Analysis View open comment periods on
http://webit2/corporate/kc/home/comment.cfm
Thomas D. Svendsen, General Manager, Klickitat PUD
No E-mail Address Submitted

131 S. Columbus
Goldendale WA 98620
February 12, 2004 Bonneville Power Administration DM-7, P.O. Box 14428 Portland, OR 97293-4428
Re: Summer Spill Analysis The economic impact resulting from the proposed spilling of water over dams in July and August are of very real concern to Klickitat PUD. Klickitat County is currently in economic crisis due to the closure of Goldendale Aluminum and the resultant loss of over 700 family wage jobs. This loss resulted in an unemployment rate of over 12%, one of the highest rates in a state already suffering one of the highest unemployment rates in the Nation. Klickitat PUD has made many cuts to produce a budget that will allow the utility to remain viable in the light of the many economic challenges that it now faces. Even a small increase in rates resulting from the proposed spill schedule are of critical impact in the Northwest economy, particularly so in rural areas such as Klickitat County. Utilities such as Klickitat PUD purchase power from BPA as a result pay their fair share of the cost of federal generation. A large component of this cost results from funding fish restoration efforts in the Columbia River system; in fact, fish and wildlife costs represent 21% of BPA base power rates. We support fish restoration programs, but only those that based on sound biology and reasonable economics; spilling water over dams in July and August in an attempt to pass fish is a wasteful practice that needs to be halted before the summer of 2004. Indeed, on January 21, 2003 Federal agency officials reported to the Northwest Power and Conservation Council that the annual negative revenue impact as a result of the summer spill program would be $77 million dollars. The reported biological impact on ESA listed Snake River Fall Chinook for ending summer spill completely is 24 fish, and for all 13 Fall Chinook stocks less than 20,000, out of a combined run that exceeded 600,000 fish this year. Equally important, the federal agencies are recommending changes in mitigation programs that are expected to provide an additional 51,000 to 66,000 returning fish, and a price of only $1 million. Other alternatives that should be considered include commercial harvest reductions, improvements in Hanford Reach rearing protection, avian predation research, habitat improvements, pile dike removal, and changes in smallmouth bass and northern pikeminnow management. In summary, by ending summer spill and saving up to $77 million per year, there is a compelling opportunity to improve the Northwest economy through reduced electricity rates. We can simultaneously increase the number of returning fish, including ESA listed stocks, through much less expensive mitigation measures that have demonstrated biological benefit. Therefore, we urge quick action by the Army Corps of Engineers, BPA, NOAA and any other parties to eliminate or significantly reduce the summer spill program. Such an approach makes economic sense and is consistent with the current biological opinion for the federal river system, and would result in meaningful economic help for distressed areas such as Klickitat County and Washington State.

55-0146
FEB 13 2004

Kuehn, Ginny - DM-7

From: edl@nezperce.org
Sent: Thursday, February 12, 2004 5:11 PM
To: BPA Public Involvement
Subject: Comment on Summer Spill Analysis

Comment on Summer Spill Analysis View open comment periods on
http://www.bpa.gov/corporate/kc/home/comment.cfm
R. Ed Larson
edl@nezperce.org
208-843-7300, x 2440

Lapwai ID 83540
It is disappointing to think that summer spills --water past the dam without going through the turbine would be totally discontinued. While I can continue to represent the resource (fish), the Nez Perce Tribe (resource defender) and BPA (mitigator of the resource), much of the work I have tried to implement in behalf of each of the prior three noted entities will be wasted. I hope that some intermediate position will be found. BPA has done much to help with reocvery and restoration -- an important portion has come from spilling water and fish at critical times. It is one of the important tools that is needed to restore this resource and its associated benefits to all water users, BPA included. The abundance of the resource has brought not only social but economic benefits that should be counted as adding to BPA's credits. For example the State of Idaho noted that $94 million in economic benefits came to the State as a result of the salmon and steelhead returns this past year. If similar benefits are added in for Oregon and Washington, then the value of the fish helps to off set the cost of spilling. Do not totally abandon the spill. At a minimum, identify and maintain critical segments of summer spill to support each anadromous specie needed to fulfill BPA commitment to mitigation. Remember BPA has prospered from the water resource far more than than they have lost since investing in the hydrosystem. It is not fruitful to be selfish in the eternal scheme of things, fish must also be abundantly available if we are to continue to truely enjoy the benefits of hydro power.

SS-0148

FEB 17 2004

Kuehn, Ginny - DM-7

From: jlukas@wispwest.net
Sent: Tuesday, February 17, 2004 12:08 PM
To: comment@bpa.gov
Subject: Comment on Summer Spill Analysis

Comment on Summer Spill Analysis View open comment periods on
http://www.bpa.gov/corporate/kc/home/comment.cfm
Joe Lukas
jlukas@wispwest.net
406-333-9085
P.O. Box 878
Ephrata WA 98823
To Whom It May Concern: I am a Senior Fisheries Scientist with Grant PUD and I have been working on the Hanford Reach flow fluctuation issue since 1997. I believe that the BPA spreadsheet provides an useful example of the benefits that may be associated with this program. However, I do have several concerns about this analysis. First, the 1998DATA worksheet, column H cites a personal communication with me as the source of these data. These density data were an arbitrary adjustment necessary for this type of analysis because 1998 entrapment data were obtained only from entrapments containing fall Chinook fry. This produced a large upwards bias. In 2003, WDFW sampled entrapments under a different methodology that produced 49,754 fry from 2,383,179 sq. ft. of entrapment area to give a density estimate of 0.021 fry/sq. ft (Hoffarth 2003; Hanford Entrapment Report #10). Using this density data reduces the 1998 fry estimates from 4,093,906 to 1,520,804. This in turn, reduces the estimated adult savings from a range of 15,546-124,372 to 5,061-40,488. My second concern is the range of SARs used for Hanford Reach fall Chinook. SARs from 0.5% to 4.0% were used, but a simple exercise with the spreadsheet shows that replacement would occur at a SAR of 0.18%. Use of the 2.0% and 4.0% SARs under the assumptions of this analysis suggest that the Hanford Reach return could range from 400,000 to 2,000,000 fall Chinook. This is not supported by observed return data (e.g. compare row 3 to rows 28 and 31). Recent return data suggest that SARs from 0.2% to 1.0% are more appropriate for this stock of fall Chinook. Analysis of adult PIT-tag returns would also provide better data to address this question. In summary, use of the verified density data of Hoffarth (2003) and more realistic SARs of 0.2-1.0% suggest that the flow fluctuation limits of the new Hanford Reach Fall Chinook Protection Program may result in an incremental increase of returning adult fall Chinook ranging from 2,000 to 10,000 for the 2004 Hanford Reach outmigration. This however, requires an assumption that stranding and entrapment losses are depensatory and not compensatory mortality sources. Those considering this issue should review the discussion of McMichael et al. (2003). Thank you for the opportunity to submit these comments. Sincerely, Joe Lukas, Sr. Fisheries Scientist
REFERENCES
Hoffarth, P. 2003. Hanford entrapment report #10. Washington Department of Fish and Wildlife, Pasco, WA. McMichael, G. A. and eleven co-authors. 2003. Subyearling Chinook salmon stranding in the Hanford Reach of the Columbia River. Report prepared for Public Utility District No. 2 of Grant County by Battelle-Pacific Northwest Division, Richland, WA. License Application Technical Appendix E-4.N.

55-0149
FEB 18 2004

Kuehn, Ginny - DM-7

From: jlukas@wispwest.net
Sent: Tuesday, February 17, 2004 4:41 PM
To: comment@bpa.gov
Subject: Comment on Summer Spill Analysis

Comment on Summer Spill Analysis View open comment periods on
http://www.bpa.gov/corporate/kc/home/comment.cfm
Joe Lukas
jlukas@wispwest.net
406-333-9085
P.O. Box 878
Ephrata WA 98823
To Whom It May Concern: This comment is a supplement to my earlier comments on the Hanford Reach offset spreadsheet. Another concern that I have is that the data presented in the 1998DATA worksheet only includes modeling of entrapment areas from RM 377 downstream to RM 355. To account for impacts in the entire Hanford Reach, McMichael et al. (2003) developed a methodology that considered habitat complexity, spawner distributions and distance from Priest Rapids Dam. This effort showed that fry mortality estimates should be doubled to account for the entire Hanford Reach rearing area. Thus, my earlier recommendation for modifying the 1998 estimate should be multiplied by 2 to give an estimate of 3,041,608 fry in 1998. The fyr mortality estimates for 1999-2003 were based on this same approach as shown in Table 7.2 of McMichael et al. (2003). This adjustment gives a corresponding range of incremental adult return increases from 4,500 for a SAR of 0.2% to 22,500 for a SAR of 1.0%, although the 500,000 adult return estimated using linear extrapolation for all mortality sources appears exceedingly optimistic as density-dependent mortality sources (e.g. redd superimposition) may be expected for large spawning escapements like the 90,000 fish escapement of 2003. Redd superimposition would manifest itself primarily through reduced egg to fry survival rates, although there is no available data and additional assumptions would be necessary to make these density-dependent adjustments. My message is to consider the implications of these compensatory mechanisms while evaluating whether adult returns implied by these modeling exercises are realistic. Sincerely, Joe Lukas, Sr. Fisheries Scientist

SS—0150

Kuehn, Ginny - DM-7

FEB 18 2004

From: jscheel@popud.com
Sent: Wednesday, February 18, 2004 12:28 PM
To: comment@bpa.gov
Subject: Comment on Summer Spill Analysis

Comment on Summer Spill Analysis View open comment periods on
http://www.bpa.gov/corporate/kc/home/comment.cfm
Jim Scheel
jscheel@popud.com
509-447-6702
PO Box 549
Ione WA 99139
RE: Summer Spill Analysis Gentlemen; I wish to thank the BPA, the Power Planning and Conservation Council and NOAA Fisheries for the opportunity to comment on the options you are considering for Summer Spill 2004. It is my understanding that several federal agencies are considering reducing the number of days of summer spill in the month of August and in its place conduct supporting work to supplement the fisheries of the Columbia River. Supplemental work would include such tasks as barging juvenile salmonids around hydro facilities and predator control regarding fish such as the northern pike minnow. Governor Martz of Montana brought up this idea last summer and I believe this is a good, common sense approach to the multifaceted issue of fish survival and economic health of hydro operations. I wish to support the idea of, not elimination, but reducing summer spill while providing supplementary work to help the salmonids achieve similar or better survival than the summer spill program. I believe this program would provide additional environmental benefits that may not often be considered....namely off -site impacts. Summer spill increases TDG issues during a time of year when the fish are stressed by high temperatures. Is it wise to continue to spill into the hottest month of the year when alternative strategies could transport the fish without adding TDG issues to the aquatic environment ? Also, with spill there is the loss of energy and dollars that occur concurrently. The lost power is still needed, so the replacement energy bought will come most probably from gas fired turbines . Air pollution will result from this demand as well as the loss of hydro dollars in the purchase of this electricity from out of the area. These hydro dollars could have been generated from flows and some of the surplus could have funded additional measures to protect the salmonids..both residential and anadramous. Ocean conditions are not the only thing that has fluctuated over the last several years, as the financial status of BPA has waxed and waned. We support a common sense approach that would allow reduction of spill in August and would result in the increase in revenue for BPA and other generators while providing additional strategies for increasing salmon populations. Sincerely, Jim Scheel Director, Hydro Operations & Power Supply Pend Oreille Public Utility District

Big Bend Electric Cooperative, Inc.
1373 N. Hwy 261
PO Box 348
Ritzville, WA 99169-0348
Telephone: (509) 659-1700
Fax: (509) 659-1404
www.bbec.org

SS-0153
FEB 18 2004

February 12, 2004

Mr. Steven Wright, Administrator
Bonneville Power Administration
PO Box 3621
Portland, OR 97208-3621

Re: Summer Spill for Salmon on the Columbia and Snake Rivers

Dear Mr. Wright:

Big Bend Electric Cooperative, Inc. is a member-owned, non-profit cooperative serving about 7,500 accounts primarily in Adams and Franklin Counties in Washington. Big Bend is a full requirements customer of the Bonneville Power Administration (BPA).

More than half of our sales are to irrigators and most of our consumers are, in some way, tied to agriculture. The successfulness of our agriculture related accounts tend to be highly dependent on the availability of affordable power.

A significant component of our power costs from BPA includes funding for fish restoration efforts in the Columbia River system. Since a large portion of funds for fish restoration programs ultimately comes from the pocketbooks of electric consumers, our consumers expect these programs to be based upon sound biology with accountability for results in returning fish.

Recent materials prepared by Federal agency officials indicate that spilling water over dams in the months of July and August in an attempt to pass fish in the river system is not a cost-effective practice and that this "summer spill" needs to be halted before the summer of 2004. We understand that there are much less expensive mitigation measures that have demonstrated biological benefit and are much more cost-effective.

We at Big Bend Electric Cooperative believe there is a significant opportunity to improve the Northwest economy through reduced electricity rates achieved partly by eliminating summer spill. We believe less expensive mitigation measures can offset fish losses incurred by eliminating summer spill. Therefore, we urge the Army Corps of Engineers, BPA, NOAA, and other parties involved to eliminate the summer spill program.

Thank you for your consideration and leadership on this important issue.

Sincerely,

James A. Johnson

James A. Johnson, Manager

NRU

Northwest Requirements Utilities

(503) 233-5823
Fax (503) 233-3076
jsaven@pacifier.com

825 NE Multnomah, Suite 1135
Portland, Oregon 97232

04.0019

2.18.04

Info Only

55-0156

FEB 20 2004

February 17, 2004

Governor Ted Kulongoski
Oregon Governor's Office
State Capitol, Room 254
Salem, OR 97301-4047

INFO ONLY: Suzanne Cooper-PG-5
cc: FO3, DC/Wash, DR-7, L-7, P-6, PG-5, PGF-6, Taves-DR-7C, Bodi-A/Seattle, McNary-A-7

Re: Summer Spill for Salmon on the Columbia and Snake Rivers

Dear Governor Kulongoski:

Northwest Requirements Utilities (NRU) is an association of 46 publicly and consumer owned electric distribution utilities serving over 455,000 customers throughout the Northwest. We have 17 member utilities in the state of Oregon all the way from the City of Ashland to Oregon Trail Electric. Our members rely upon the Bonneville Power Administration (BPA) as their primary or exclusive wholesale supplier of energy and transmission services, and they account for over 20% of the firm power sold by the BPA in the region. Energy prices are a key driver of the Oregon economy, particularly in the more rural areas where many of the NRU members are located, such as Harney County. Unfortunately the Northwest continues to lead the nation in unemployment, while BPA's wholesale rates are about 40% higher than just a few years ago. The state government of Oregon has an immediate opportunity to help our economy while also providing environmental stewardship.

Our member utilities purchase power from BPA and as a result pay their fair share of the full cost of federal generation. One of the largest components of this cost includes funding for fish restoration efforts in the Columbia River system. Not including the one time cost effects of the 2000 – 2001 west coast price run up, fish and wildlife costs constitute 21% of BPA's base power rates. We strongly support fish restoration programs that are based upon sound biology and can demonstrate accountability for results in returning fish. Over the years BPA's revenue requirement has been impacted by over $6 billion for measures associated with fish mitigation.

However, there is one major river operations practice that is extremely costly and has negligible biological benefit for salmon runs listed under the Endangered Species Act. Spilling water over dams in the months of July and August in an attempt to pass fish in river is a wasteful practice that needs to be halted before the summer of 2004. Over 90% of the juvenile Fall Chinook in the Columbia and Snake Rivers are safely transported past the dams and released below Bonneville dam. Recent materials presented on January 21st by Federal agency officials to the Northwest Power and Conservation Council show the annual revenue loss of the summer spill program for July and August of $77 million.

The reported biological impact on ESA listed Snake River Fall Chinook for ending summer spill completely is 24 fish, and for all Chinook stocks less than 20,000, out of a combined adult run of 385,000 Chinook, less than 5%. These abundant stocks are then harvested at over a 50% rate when they return. Equally important, the federal agencies are recommending changes in mitigation programs that are expected to provide an additional 51,000 to 66,000 returning fish, and a price of only $1 million. These include a more aggressive program to reduce Northern Pikeminnow predation and an expanded Hanford Reach rearing plan.

Those opposed to eliminating summer spill make arguments that we may not have all conceivable data to determine the scientific impacts (if any) on fish mortality, either immediate or delayed. Such arguments need to be considered in the context of the overall lack of scientific information used as a base initially for establishing summer spill. It is time for common sense and application of best available data to prevail.

In summary, by ending summer spill and saving up to $77 million per year, there is a compelling opportunity to improve the economy of Oregon through reduced electricity rates. We can simultaneously increase the number of returning fish, including ESA listed stocks, through much less expensive mitigation measures that have demonstrated biological benefit.

Therefore, we urge quick action by the Army Corps of Engineers, BPA, NOAA and any other parties to eliminate or significantly reduce the summer spill program. Such an approach makes economic sense and is consistent with the current biological opinion for the federal river system. Your direction to the Oregon Department of Fish and Wildlife and The Northwest Power Planning and Conservation Council supporting these concepts would be of considerable assistance.

Thank you for your continuing leadership on these important issues. The NRU members recognize there is an opportunity to address and resolve the issue before the summer of 2004, and we stand committed to assist in any way possible to achieve this objective.

Sincerely,

John D. Saven
Chief Executive Officer

cc: Oregon State, Northwest Power and Conservation Council Members
Steve Wright, Administrator, Bonneville Power Administration
Lindsay Ball, Director, Oregon Department of Fish and Wildlife

NRU

Northwest Requirements Utilities

(503) 233-5823
Fax (503) 233-3076
jsaven@pacifier.com

825 NE Multnomah, Suite 1135
Portland, Oregon 97232

Copy

February 17, 2004

Governor Gary Locke
Washington Governor's Office
PO Box 40002
Olympia, WA 98504-0002

Re: Summer Spill for Salmon on the Columbia and Snake Rivers

Dear Governor Locke:

Northwest Requirements Utilities (NRU) is an association of 46 publicly and consumer owned electric distribution utilities serving over 455,000 customers throughout the Northwest. We have 14 member utilities in the state of Washington serving customers all the way from the Orcas Island to Spokane. Our members rely upon the Bonneville Power Administration (BPA) as their primary or exclusive wholesale supplier of energy and transmission services, and they account for over 20% of the firm power sold by the BPA in the region. Energy prices are a key driver of the Washington economy, particularly in the more rural areas where many of the NRU members are located, such as Ferry County which continues to suffer from extremely high rates of unemployment and underemployment. Unfortunately the Northwest continues to lead the nation in unemployment, while BPA's wholesale rates are about 40% higher than just a few years ago. The state government of Washington has an immediate opportunity to help our economy while also providing environmental stewardship.

Our member utilities purchase power from BPA and as a result pay their fair share of the full cost of federal generation. One of the largest components of this cost includes funding for fish restoration efforts in the Columbia River system. Not including the one time cost effects of the 2000 – 2001 west coast price run up, fish and wildlife costs constitute 21% of BPA's base power rates. We strongly support fish restoration programs that are based upon sound biology and can demonstrate accountability for results in returning fish. Over the years BPA's revenue requirement has been impacted by over $6 billion for measures associated with fish mitigation.

However, there is one major river operations practice that is extremely costly and has negligible biological benefit for salmon runs listed under the Endangered Species Act. Spilling water over dams in the months of July and August in an attempt to pass fish in river is a wasteful practice that needs to be halted before the summer of 2004. Over 90% of the juvenile Fall Chinook in the Columbia and Snake Rivers are safely transported past the dams and released below Bonneville dam. Recent materials presented on January 21st by Federal agency officials to the Northwest Power and Conservation Council show the annual revenue loss of the summer spill program for July and August of $77 million.

The reported biological impact on ESA listed Snake River Fall Chinook for ending summer spill completely is 24 fish, and for all Chinook stocks less than 20,000, out of a combined adult run of 385,000 Chinook, less than 5%. These abundant stocks are then harvested at over a 50% rate when they return. Equally important, the federal agencies are recommending changes in mitigation programs that are expected to provide an additional 51,000 to 66,000 returning fish, and a price of only $1 million. These include a more aggressive program to reduce Northern Pikeminnow predation and an expanded Hanford Reach rearing plan.

Those opposed to eliminating summer spill make arguments that we may not have all conceivable data to determine the scientific impacts (if any) on fish mortality, either immediate or delayed. Such arguments need to be considered in the context of the overall lack of scientific information used as a base initially for establishing summer spill. It is time for common sense and application of best available data to prevail.

In summary, by ending summer spill and saving up to $77 million per year, there is a compelling opportunity to improve the economy of Washington through reduced electricity rates. We can simultaneously increase the number of returning fish, including ESA listed stocks, through much less expensive mitigation measures that have demonstrated biological benefit.

Therefore, we urge quick action by the Army Corps of Engineers, BPA, NOAA and any other parties to eliminate or significantly reduce the summer spill program. Such an approach makes economic sense and is consistent with the current biological opinion for the federal river system. Your direction to the Washington Department of Fish and Wildlife and Washington members of the Northwest Power Planning and Conservation Council supporting these concepts would be of considerable assistance.

Thank you for your continuing leadership on these important issues. The NRU members recognize there is an opportunity to address and resolve the issue before the summer of 2004, and we stand committed to assist in any way possible to achieve this objective.

Sincerely,

John D. Saven
Chief Executive Officer

cc: Washington State, Northwest Power and Conservation Council Members
Steve Wright, Administrator, Bonneville Power Administration
Dr. Jeffrey P. Koenings, Director, Washington Department of Fish and Wildlife