

Northwest
RiverPartners
For salmon, our economy and quality of life

April 10, 2006

Colonel Debra Lewis
US Army Corps of Engineers
Seattle District
PO Box 3755
Seattle, WA 98124

RE: Columbia River Fish Mitigation System Flood Control Review

Dear Colonel Lewis:

Northwest RiverPartners (RiverPartners) is a non-profit association representing a broad consortium of river users in the Pacific Northwest. RiverPartners members are dramatically affected by efforts to recover listed endangered salmon and steelhead – through power costs and affected river uses. We oppose the US Army Corps of Engineers (Corps) proposal to fund and further study flood control modifications purportedly to benefit Endangered Species Act (ESA) listed species in the Northwest.

We believe the best way to protect and recover salmon and steelhead in the Northwest and maintain a healthy economy is through use of the best available independent science and allocation of federal funds to maximize species' benefits. The Corps' proposed feasibility study, which would cost customers of the Bonneville Power Administration over \$30 million dollars and take six years to complete, does not meet either of these criteria and we do not support its implementation.

The premise of the proposed feasibility study is that in-river juvenile migration and survival may be improved in the spring and summer through increased flows as a result of changed flood control operations. Currently, there is no credible scientific information that providing increased flows will benefit salmon and steelhead. In fact, this premise has been seriously called into question. In February 2003, the Independent Science Advisory Board concluded that the flow-survival paradigm "is no longer supportable". More recently, in December 2005, the federal Judge presiding over the remand of the 2004 Biological Opinion also questioned the validity of the relationship between flows and fish survival. Further, it appears the Corps is proposing to implement the feasibility study as referenced in the 2000 and 2004 Biological Opinions – which have been vacated by the court.

These findings underscore the serious questions surrounding the study's design and assumptions. Also, there are other programs and potential uses for this \$30 million that would provide real, demonstrable benefits to fish. Examples include removable spillway weirs and programs that reduce the impact of avian and mammalian predation. RiverPartners strongly believes that these programs should receive priority funding.

Finally, agencies, utilities, biologists and other affected parties are currently engaged in negotiations in response to Judge Redden's remand of the federal Biological Opinion (BiOp). The result of the remand process will determine river operations for fish, and will conclude long before the proposed flood control modification study will be completed.

Northwest RiverPartners is committed to achieving a balanced approach to preserving multiple uses of the Columbia and Snake Rivers in order to preserve a sound economy as well as efficient, cost-effective salmon and steelhead protection and recovery. Northwest RiverPartners does not believe that adding a \$30 million, six-year Corps of Engineers Flood Control Study will meet these goals.

We appreciate the opportunity to comment on this important issue and look forward to working with the Corps as we look for the most effective ways to provide benefits to ESA listed salmon and steelhead.

Sincerely,

Terry Flores, Executive Director
Northwest RiverPartners

Cc: Northwest Congressional Delegation
NWPC
Brigadier General Gregg Martin
Steve Wright, BPA Administrator