

February 1, 2000

Federal Caucus Record  
Public Comment Officer  
c/o BPA-PL  
707 West Main, Suite 500  
Spokane, WA 99201

Dear Public Comment Officer:

Re: Conservation of Columbia Basin Fish

Reading your publication (Fall 99, Issue 2, "Building a Conceptual Recovery Plan") leads us to believe there are some significant deficiencies:

#### **I. HABITAT OPTIONS**

Options 1 and 2 are inseparable. There is no choice but to require Federal and Regional plans to be coordinated. Option 1, therefore, is unacceptable as a standalone option. Option 3 is unacceptable. In addition, Option 3 does not define what an acceptable plan under Option 2 would need to be.

Add Option 4/Water Level Management. There should be increased coordination among Federal and non-Federal entities to provide better control of local flooding, irrigation and flow augmentation. Impoundments created by Federal and non-Federal entities would be integrated to improve spawning, nursing and rearing habitats for resident and anadromous fish.

#### **II. HARVEST OPTIONS**

The options proposed provide for an excessive harvest of listed species. Five percent and seven percent of wild stocks of spring and fall Chinook are too high when based on 1999 catch rates. Harvest of A and B run steelhead runs should not be based on 1999 harvest rates. Rather than base harvest on prior harvest data, escapement goals should be established which will allow salmon and steelhead to escape to spawn. Those goals should be sectionalized so that part of the runs is allowed to pass given points before harvest in that area can start. Following the first cycle of escape and harvest, a second and third cycle should be established. The objective of the plan is to allow a portion of the early, mid and late returning adults to escape and allow a portion of the run (if escapement goals are reached) to

be subject to harvest. Escapement would be guaranteed. The current options guarantee harvest. This is backwards.

There is no option proposed for the condition, which would be created when restoration of fish runs shows some success. Some runs will improve in some streams faster than in others. However, the weak run and strong runs will be missed in the river. Increased harvest of the stronger runs will also increase harvest of the weaker runs, which is not acceptable. The weak runs will be adversely impacted if harvest is allowed to increase just because some runs are recovering. It should be anticipated that pressure to increase harvest in the face of success would be rapid and intense. A means should be considered that would address this anticipated pressure to increase harvest. Increases in any run should be left untouched so as to accelerate the recovery effort.

All options should provide for compliance with the Pacific Salmon Treaty provisions. No option should use the 1999 harvest rates, but should use the 1996 rates instead.

#### OPTION 4

Establish escapement goals by region progressing upstream. Harvest would not commence until escapement goals for each specific checkpoint has been achieved. Compliance with Pacific Salmon Treaty is preserved.

#### OPTION 5

Selective harvest methods shall require that commercial harvest be restricted to systems, which would allow wild fish to be identified and released unharmed. These methods include traps, fish wheels and hook and line trolling.

### III. HATCHERY OPTIONS

The options as written are ambiguous. They should be revised to state the uniqueness between and among the three options proposed.

#### OPTION 4

Supplementation experimental projects using eyed-out eggs placed in suitable protective devices in selected underutilized habitat should be developed in cooperation with state agencies, local stake holders and conservation groups.

**IV. HYDROPOWER**

The objective stated in this section of the draft paper state, "provide in stream and reservoir environmental conditions necessary for adequate survival of resident fish and other aquatic species."

Both Options 1 and 2 should be amended to state that Federal plans should be coordinated with local plans for improved fish passage and resident habitat.

**V. INTEGRATED ALTERNATIVES**

ALTERNATIVE D (new)

I. HABITAT

- Option 2 Coordinated regional plans
- Option 4 Coordinated water level planning

II. HARVEST

- Option 4 Management by escapement
- Option 5 Harvest restricted to "live" harvest methods

III. HATCHERIES

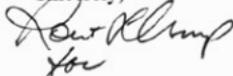
- Option 1
- Option 4 Supplementation using eyed-out eggs in underutilized habitat

IV. HYDROPOWER

- Option 1 Amended to include non-Federal facilities

These are the views of the Board of Directors of Kootenai Electric Cooperative, Inc. representing 14,000 members.

Sincerely,



William H. Boekel  
President/KEC Board of Directors

RLC/tcb