



The Montana Power Company

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Federal Caucus Comment Record, c/o BPA-PL
707 W. Main St. Suite 500
Spokane, WA 99201

Dear Federal Caucus:

This letter is in response to the December 1999 draft, Conservation of Columbia Basin Fish, Building a Conceptual Recovery Plan, commonly referred to as the "All-H" paper. We, at The Montana Power Company, applaud the nine federal agencies for joining forces to seriously tackle the Pacific Northwest salmon issue from a basin-wide, multi-species perspective and for seeking solutions that provide benefits to the salmon populations throughout their lifecycles.

The strong emphasis on clear, consistent goals in your paper is commendable. These goals can provide the needed policy direction for establishing management priorities and focusing the use of our limited resources to best improve the plight of the listed salmon. However, the five goals suggested in the draft paper are potentially inconsistent and therefore may not be simultaneously attainable. For example, depending on how these goals are interpreted and implemented the goal of assuring tribal fishing rights may be incompatible with the goal of avoiding extinction and fostering long-term survival and recovery of Columbia River salmon and steelhead. Therefore, it is vitally important that the Federal Caucus provide the region with the leadership to identify the priority of these goals if a conflict does arise.

The conceptual framework laid out in this draft paper for developing a thorough, practical, usable recovery plan is a good one. It considers actions in each of the four Hs and if the combinations of options are done well it should result in a balanced, effective recovery plan. In the draft document you have made it clear that the range of options for each of the four Hs and the integrated alternatives discussed are for illustrative purposes only. However, based on these examples, there is still much work to do before a recovery plan could be finalized. The Federal Caucus should work with all interested parties to improve the options and make the integrated alternatives more realistic. The following are some of our concerns.

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- The harvest options should be more than a range of harvest rates. They should include changes in harvest methods; timing, location, equipment and gear to allow more harvest of hatchery fish with less impact on listed stocks.
- The hatchery options must be coordinated with recovery goals and the harvest policies.
- The hydro options should be broader. They are too narrowly focused on Snake River dam removal and flows and should incorporate the most recent “best available science” from the NOAA Science Center in Seattle.
- The habitat options define who will participate without describing the types of actions that might be considered and without providing a basis for setting priorities.

The integrated alternative that would ultimately become a recovery plan must address all the goals, be comprehensive across the lifecycle of the listed stocks, internally consistent and economically and politically achievable. The examples of integrated alternatives used in the draft paper do not seem to achieve these necessary conditions. This is in part because the ranges of options for each of the Hs aren't comprehensive. Thus, reasonable integrated alternatives are not achievable. The Federal Caucus must ensure that the integrated alternatives are a consistent assemblage of recovery and fisheries management options that will achieve the stated goals.

It is encouraging that biological performance standards are being considered for all the H's. The current approach to management of the recovery effort is not relying on measures of biological survival, but instead it is based primarily on physical measures such as flow, percent spill, temperatures, etc. There is much work to do to develop rigorous, effective, biologically based performance standards. However, as a starting point these standards should be based on NMFS' scientific research that partitions the total lifecycle mortality of salmon into the various life stages. This will provide substantial benefits to the recovery effort if the region can systematically move toward more direct measures of biological performance to assure that biological goals are being met and it will encourage clearer responsibility and accountability in the recovery process.

An effective monitoring and evaluation program for each of the Hs is also essential for the region to have success in recovering the listed stocks. The region has learned a lot about the factors affecting salmon survivals over the last twenty years, but there is still much we don't know. The final All-H paper should include a description of how new information from the monitoring and evaluation will be incorporated into management decisions and the choice of recovery actions.

The Caucus is correct in the assessment that better coordination is needed among the federal agencies across the four H's to maximize the benefits of any federal spending and actions. The federal agencies, working with the Council should seek agreement on a common set of priorities for funding and decision-making on implementation actions

within each H. With a common set of priorities in place each responsible agency or body can make their decisions accordingly. Also, to provide better coordination NMFS should combine and cross-reference the many Biological Opinions to insure that the left hand and right hand are working together. Getting all the BOs finalized in as close to the same time frame as possible would also help with setting clear, consistent biological priorities.

Coordination amongst the federal agencies could also be improved if there was more clarity about who is responsible for what. This would be helpful for that inside and outside the agencies. Thus, the next draft of the All H paper should specify who is responsible for what decisions. For example, for in-river operations NMFS is responsible for ESA implementation. NMFS uses an established planning process where other impacted parties provide input to decisions through the Technical Management and Implementation Teams. These are useful forums for consultations between federal agencies, the states and the tribes, however, when they don't agree, NMFS makes the final decision on in-season management actions. With this as an example, who is ultimately responsible for hatchery operations, habitat improvements and changes in harvest practices? The Caucus should document this for each of the Hs.

Up until now there has been a serious over-emphasis on the hydro "H" at the almost complete exclusion of critical recovery actions in habitat, hatcheries, harvest and understanding ocean conditions. This imbalance is not scientifically credible given the latest lifecycle analysis from CRI and it must come to an end. The All-H paper and the recovery plan that it precedes are opportunities to change that. As has been said many times, there is no silver bullet that will save all the fish. However, a single, comprehensive recovery approach guided by clear goals and priorities is what the region needs to restore and protect the listed fish. With the draft All H Paper the Federal Caucus has taken a giant step toward that end.

Thank you for this opportunity to comment. We look forward to engaging with the federal agencies and others as the region takes the next steps.

Sincerely,



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