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Public Utility District No. 1 of Chelan County

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April 24, 2000

U.S. Army Corps of Engineers
 Walla Walla District
 Attention: Lower Snake River Study
 201 North Third Avenue
 Walla Walla, WA 99362-1876

Re: Comments of Chelan County Public Utility District on the Lower Snake River Juvenile Salmon Migration Feasibility Study/Draft Environmental Impact Statement

Chelan County Public Utility District (Chelan County PUD) appreciates the opportunity to comment on the Draft Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement (FR/DEIS). Our utility owns and operates the nation's second largest nonfederal, publicly owned hydroelectric generating system. Two of our hydroelectric projects, Rocky Reach and Rock Island, are part of an 11 dam system on the Columbia River. The utility's third project, Lake Chelan, serves a dual purpose of generating power and regulating the level of 50-mile-long Lake Chelan, the third deepest body of fresh water in North America. These projects have a combined total generating capacity of over 2 million kilowatts of low-cost, clean, renewable power – enough to meet the needs of a city of more than 900,000 people.

The Pacific Northwest is blessed with a remarkable river system with many benefits – flood control, recreational opportunities, fishing opportunities, navigation, irrigation and a clean, renewable source of energy. Chelan County PUD joins others in the region with a commitment to preserve and enhance our natural resources while preserving the many benefits of this multi-purpose river system. We recognize our projects have impacted our natural resources and we have actively worked to solve our portion of the problem – in a responsible, balanced way. In fact, the utility has been a leader for many decades in developing and implementing plans to enhance the survival of fish at its facilities and in Columbia River tributaries. The first Habitat Conservation Plan for salmon and steelhead was developed by Chelan County PUD and Douglas County PUD in cooperation with various state and federal fisheries agencies, including National Marine Fisheries Service (NMFS) and Native American tribes. The plan includes a combination of fish bypass systems at the hydro projects, hatchery programs and habitat restoration work along tributary rivers and streams. This habitat conservation plan model has measurable performance standards and flexibility to determine the appropriate measures to implement in order to get the best results.

Like Chelan County PUD, the hydropower industry has taken great pride in improving the system we have had in place and relied on for many decades. The industry takes seriously its responsibility for improving fish populations. The fish transportation effort at the federal facilities is

outstanding, other fish passage improvements are being considered and new technology and turbine designs are currently being tested. The increasing number of fish in the river system is encouraging. Recent counts indicate fish survival through the river system is as high as it was in the 1960s and 1970s – before the hydroelectric facilities on the lower Snake River were built.

The fundamental concern with the FS/DEIS is that we have jumped to a drastic, unproven measure like dam breaching without real knowledge, scientific or otherwise, that we will get results and without really taking the time to develop a comprehensive plan for recovery. For example, there is much we don't know about other factors affecting the salmon lifecycle and there are gaps in what we do know. These gaps are particularly evident with respect to knowledge about impacts of ocean and estuary conditions on salmon survival. NMFS recognizes in recent studies that there is unexplained mortality that could be caused by many factors – factors that have yet to be identified and will need to be researched. The Cumulative Risk Initiative, indicates that it is unlikely any of the alternatives alone, including dam breaching, will recover our fish populations. Attempts to assign the entire mortality to the hydropower system, as implied with the FS/DEIS, create nothing more than false solutions.

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Recently, the Northwest Power Planning Council issued a report that estimates the need for 3,000 megawatts of new electric power production by the year 2003. The four hydroelectric facilities on the lower Snake River produce 1,195 megawatts for the Bonneville System, with a peaking capacity of 3,033 megawatts. Breaching these dams would increase the projected regional power deficit by 40 percent. It is unrealistic and naïve to think the region will just conserve the energy lost or look exclusively to other renewable energy sources for replacement power. Breaching these hydroelectric facilities would not only affect our energy supply but would cause the agricultural community to turn to rail or diesel trucks in order to transport their commodities. This makes things even worse. Your own study indicates that replacement power and alternative modes of transportation would put an additional 4.2 million tons of pollutants into our air each year. If we are truly facing an energy shortage and truly concerned about air quality, then making decisions to dismantle our hydroelectric facilities is definitely premature.

Chelan County PUD believes the production of clean, renewable, reliable and affordable hydropower and recovering our fish populations are not mutually exclusive. To preserve both, the region must avoid experiments that are risky and costly to our economy and our natural resources. To preserve both, the region must get beyond the polarizing debates we're currently plagued with to a comprehensive recovery plan that is reasonable, achievable and grounded in sound, credible science. The region is in the midst of an important debate. Critical decisions will be made as a result – decisions that will affect salmon and other natural resources as well as the people of the Pacific Northwest. Chelan County PUD appreciates the opportunity to comment and looks forward to sharing our successes with others in the region as we work together on responsible solutions to these complex natural resource challenges.

Very truly yours,



Roger A. Braden
General Manager/Chief Executive Officer