

October 7th, 2013

Bruce Suzumoto
Assistant Regional Administrator
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RE: Comments on the 2013 Draft Supplement to the 2008/2010 Biological Opinion

Dear Mr. Suzumoto,

Northwest Requirements Utilities (NRU) is writing to express our members' support for the Draft BiOp. NRU is a non-profit trade association of 52 public power systems that rely upon BPA as their primary or exclusive supplier of wholesale electric energy. These utilities account for nearly 25% of BPA's wholesale public power sales in the Northwest. Northwest Requirements Utilities has been very active in all forums to support BPA in fulfilling their environmental stewardship responsibilities, particularly regarding fish and wildlife issues associated with FCRPS operations. The Biological Opinion is the foundational document governing salmon recovery in the Columbia River basin and is a key component in determining the overall cost of BPA's wholesale power supply. NRU members support the comments of Northwest River Partners.

NRU members commend NOAA Fisheries, the action agencies, and their state and tribal counterparts for implementing this 20 year, \$1.6 billion effort to increase the abundance levels of endangered salmon. NRU members agree that this supplemental draft BiOp clearly achieves the goal that the continued operations of the Federal Columbia River Power System (FCRPS) will neither jeopardize listed salmonids nor hinder these species from trending towards recovery. The Draft BiOp utilizes sound science to support the continued recovery of listed salmonids.

The region has made significant progress in mitigating the impacts of the dams on listed steelhead and salmon, with all eight federal mainstream hydro projects meeting the BiOp's performance standards of 96% survival for spring migration and 93% survival for summer migration. Operational changes, combined with key improvements in the fish passage systems, including removable spillway weirs, spill walls, improved bypass facilities, flow deflectors, and corner collectors, have increased overall dam survival for migrating salmon.

NRU members generally support the Draft BiOp's approach to spill operations. NRU members agree that spill amounts and pattern should be based on the best available science. Spill levels should be managed according to the specific characteristics of each dam in order to balance the needs of adult and juvenile fish passage. While spill is important in helping juvenile fish migrate downriver, this

must be balanced with managing flows to ensure that returning adult fish can find and efficiency navigate through the fish ladders.

NRU members urge NOAA Fisheries to continue to reject all calls for additional experimental spill. Not only is there a lack of data indicating any survival improvement from additional spill, but there is also significant potential that experimental spill could cause more harm than good. Spill beyond the current total dissolved gas caps of 120%¹ is dangerous for salmon and other aquatic species. High levels of dissolved gasses can harm or even kill juvenile salmon and can disorient or injure returning adults. Now is not the time to engage in a dangerous experiment that lacks a strong scientific basis. NRU members urge NOAA Fisheries to continue to follow the best available science with respect to spill.

Additionally, NRU members support the Draft BiOp's proposed 50/50 split between transport and in-river migration for juvenile fish. Transporting a percentage of the juvenile salmonid population spreads the risk among multiple avenues of migration. Increased transportation is warranted particularly when demonstrated to benefit a particular population.

Furthermore, in regards to habitat improvements, NOAA Fisheries has done an admirable job identifying specific tributary and estuary habitat measures that are reasonably certain to occur between 2014 and 2018. Habitat and estuary improvements are critical to the continued recovery and resiliency of salmon populations. NRU members support the continued utilization of independent, expert scientific review boards to evaluate habitat improvement measures and to evaluate survival benefits from implementation. Habitat and estuary improvement projects should continue to be prioritized based on the best available science.

In regards to predation management, NRU members support the continued implementation of measures to reduce the impacts of predation on salmonid populations. While NRU members support the ongoing predation management programs, we also recognize that it is particularly important to develop mitigation plans as new predator populations are identified, including new interior Columbia Basin avian predator populations.

With abundance levels the highest the region has seen in decades, NRU members urge NOAA Fisheries to actively rebut why more aggressive actions proposed by some parties, such as reservoir modification, or flow augmentation, are not necessary, and may have a negative impact on ESA listed stocks of fish. The final BiOp should highlight the success in achieving increased abundance among nearly all the interior Columbia River Basin populations. NOAA Fisheries has achieved the requirements in Judge Redden's remand order by including more definitive set of restoration measures that are reasonably certain to occur.

NRU members recognize the effort NOAA Fisheries, the action agencies, and their state and tribal counterparts have expended in developing and implementing the BiOp. We are pleased that these efforts have resulted in increased abundance for listed species. Overall, the 2013 Draft Supplement to the 2008/2010 Biological Opinion represents a scientifically sound approach to the continued recovery of salmon in the Columbia River Basin. The region needs to continue along this path where the

¹ 120% represents a waiver from federal Clean Water Act total dissolved gas standard of 110%.

FCRPS facilities continue to provide clean, carbon free power supply that can be used to integrate other renewable resources, while simultaneously making steady progress in fish and wildlife protection.

Thank you for the opportunity to comment.

Sincerely,

John D. Saven
Chief Executive Officer