

25 October 2006

Steve Wright
c/o David Basaraba
Communications and Liaison - PL – 6
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Dear Administrator Wright:

Thank you for the opportunity to comment on BPA's proposed Regional Dialogue.

Idaho Rivers United has been a vigorous advocate for restoring Snake River stocks of anadromous fish for over a decade. Wild stocks of spring/summer chinook, fall chinook, summer steelhead and sockeye salmon are all listed under the Endangered Species Act. Coho salmon went extinct in 1986. The chief reason for the demise of Snake River salmon stocks has been dams.

With that said, we do not believe that your agency can adequately plan for meeting the region's electrical needs without first resolving the Snake River salmon crisis.

The Snake River is the Columbia's largest tributary. In the early 1800s, when Lewis and Clark first encountered the Snake drainage, upwards of 4 million anadromous fish returned to the basin annually. Historically the Snake was the largest producer of spring/summer chinook salmon and summer steelhead. That number is now less than 50,000 wild fish.

Idaho's Snake River spring/summer chinook, steelhead and sockeye migrate inland from 500 miles at Lewiston to 900 miles in the upper Salmon River Basin ascending up to 7,000 ft – no other salmon populations in the world migrate this far and at this elevation. Spring/summer chinook have an exceptional amount of body energy in the form of oil and fat reserves that allows them to migrate long distances while not feeding. Because of their body condition they were revered by the native Americans as an essential food source – and also by the Columbia River commercial fisherman who capitalized on their prime condition just out of the ocean – Snake River spring chinook when available still garner the highest price in the fish market.

The Columbia River legacy for populations of spring/summer chinook and summer steelhead rests in the Snake River because of the quantity and quality of habitat the basin supports for the spring migrating salmon. The Clearwater, Salmon, Grand Ronde, Imnaha and Tucannon river drainages collectively

support abundant wilderness and roadless ground for restoring wild spring/summer chinook and summer steelhead to the Snake Basin.

Recovering wild Snake River salmon and steelhead will only come after the lower Snake River dams have been removed and the migration corridor is reduced to four Columbia River dams. The attempts to make the lower Snake dams and reservoirs fish friendly has not worked and the continued investment of ratepayer dollars to do so is unwise.

The marginal power generation of the lower Snake River dams — 2% of the Northwest Power Pool — can be replaced through efficiency and conservation in spite of the projected load growth through 2024. The power sales revenue from the lower Snake dams can be largely offset by not having to invest hundreds of millions in failed fish recovery measures just to preserve the status quo.

ESA is currently requiring the lower Snake dams spill water as means of improving smolt survival. The use of spill is likely to last under an aggressive no-dam removal Biological Opinion that will continue to contribute to lost BPA revenue, making the dams less cost effective.

Good regional planning as required by the Power Act is essential as we approach the next quarter century. Also, ensuring that listed Snake River salmon and steelhead do not go extinct and are recovered to sustainable/fishable numbers and the Northwest maintains an efficient and adequate power supply can be achieved after the dams are gone.

Maintaining the lower Snake River dams under the status quo, with hundreds of millions of ratepayer dollars invested into the future for ineffective salmon recovery, will not help build a vibrant future for the Northwest.

Sincerely,

Bert Bowler, Native Fisheries Director
Idaho Rivers United