



March 15, 2006

Colonel Debra Lewis
Seattle District, Corps of Engineers
P.O. Box 3755
Seattle, WA 98124-2255

Dear Colonel Lewis,

We are writing to express our concerns with your recently completed Reconnaissance Report, *Columbia River Fish Mitigation System Flood Control Review*. In particular, the proposed feasibility study estimated to cost \$30 million and take 6 years to complete troubles us. We understand that you expect this study to be paid for through the Columbia River Fish Mitigation (CRFM) Project funded primarily by Northwest ratepayers through the purchase of power from the Bonneville Power Administration (BPA). PNUCC members are public and private utilities, and the direct service industries purchasing the majority of the power marketed by BPA. We take the responsibility of mitigating the effects from Columbia River Basin dams on salmon seriously, advocating for cost-effective, biologically sound investments to aid in salmon protection and recovery. **We recommend that this feasibility study be deferred until several concerns are addressed.**

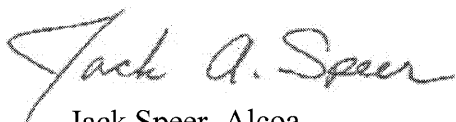
The premise for this study, that an incremental increase in flows will provide a similar increase in salmon survival, is fraught with considerable uncertainty as you acknowledge in the Reconnaissance Study where you describe the competing scientific hypotheses and models. The ambiguity of the potential benefits is confounded by several factors including the debate over barging the fish rather than leaving them in-river during poor water conditions. Before ratepayers invest \$30 million in a feasibility study, not to mention the millions more it will take to actually modify facilities if something were to be implemented, the region should be much clearer on the anticipated biological benefits.

We recommend that the proposed feasibility study be weighed against the many other efforts for salmon recovery being funded through the CRFM Project. We believe the study falls much lower in the list of priorities given the direct and measurable biological benefits of other salmon mitigation projects. For example, there is likely more that could be done to reduce sea lions' take (estimated at 3% or more in 2005) of adult salmon near Bonneville Dam. And salmon would likely see more direct benefit from reducing the take of juvenile salmonids by birds in the estuary. Accelerating the installation of removable spillway weirs and ensuring appropriate studies on Snake River Fall Chinook survival should also be a higher priority than this feasibility study.



It does not make sense to spend limited ratepayer dollars on this study until there is more certainty that the increased river flows provided by changing reservoir flood control requirements would provide a significant enough benefit to fish to justify the additional risk of flooding. If such benefits are shown to exist, then the study could proceed and could be implemented after other more effective measures had been implemented. Thank you for your consideration of our comments. We look forward to working with you toward our mutual goal to pursue biologically sound, cost-effective, goal-oriented salmon measures.

Sincerely,



Jack Speer, Alcoa
Chairman



Jim Sanders, Benton PUD
1st Vice-Chairman



Jim Lobdell, Portland General Electric
2nd Vice-Chairman

cc: Brigadier General Gregg Martin, Corps Northwestern Division Commander
Steve Wright, BPA Administrator
Northwest Delegation Members
PNUCC Members