



NOAA Fisheries Salmon Plan Due May 5th

NOAA Fisheries' draft Biological Opinion issued October 31, 2007 proposes significant measures to mitigate impacts of the federal hydropower system on listed salmon and steelhead and is a major improvement over past efforts. The new salmon plan will result in increases in salmon survival while maintaining the many benefits of the federal dams. In a time of growing concerns over climate change, it cannot be emphasized enough that these dams are the region's premier source of renewable energy and help keep the Northwest's carbon footprint at nearly half that the rest of the country

The latest Biological Opinion also is far from the "status quo" as special interest, dam removal advocates erroneously suggest. We speak from experience. At Judge Redden's direction, the region has been engaged in a two-year collaborative process to develop a new plan. RiverPartners has worked closely with a coalition of Sovereign parties participating in the collaboration including the states of Washington and Montana and upriver Tribes.

The collaborative process and the rigorous science analysis in this plan are unprecedented, having never been undertaken for a listed species before, much less thirteen. A final plan, which will include a comprehensive analysis of the Upper Snake River agreement on Bureau dams in Idaho, is to be issued May 5, 2008 with implementation to begin August 31st, however, legal challenge is likely inevitable.

This is the third remand by Judge Redden of a federal hydrosystem Biological Opinion this decade. The future of the Columbia Snake River system and its multiple benefits of navigation and trade, agriculture, flood control and carbon-free energy, literally hangs in the balance.

We think this plan, with some improvements, can strike the right balance. Here is why:

- The plan's science analysis is comprehensive, looking at each of the 13 listed salmon and steelhead populations on an individual basis and identifying major factors limiting their recovery, including hydro operations, habitat degradation, hatchery overproduction, and unsustainable harvest levels.
- The new plan incorporates a higher legal standard than the "no jeopardy" standard under the Endangered Species Act. Rather, measures are proposed to meet a standard of ensuring that species are "trending towards recovery".
- The Biological Opinion addresses climate change by modeling pessimistic climate assumptions over a twenty year period, including a wide range of climate conditions and periods of poor ocean productivity. It thus errs on the side of more protection, not less.

- Expenditures proposed under the plan total between \$1.5 billion and \$2 billion over the next ten years and are “reasonably certain to occur” a concern of previous BiOps. Funds will be provided via the Bonneville Power Administration and paid for by regional electric customers through their power bills. Under the new Biological Opinion, the costs break out as follows:
 - \$400 million in habitat/tributary improvements;
 - \$30 million in predation controls (birds, predatory fish, and sea lions);
 - \$500 million for improvements at the dams, such as installation of devices called spillway weirs (or fish slides) that boast success rates of 98-99 percent survival for young salmon migrating downstream;
 - \$30 million for “conservation” hatcheries, which address the most vulnerable stocks, raising fish in captive conditions for a head start;
 - \$75 million initially per year for research, monitoring, and evaluation.

In conclusion, this plan has the ingredients to put the region’s listed salmon and steelhead on a course of recovery. However, the hydrosystem alone cannot recover these fish. A Biological Opinion is also being developed to authorize harvest levels in the lower Columbia for commercial, sport and tribal fisheries.

In stark contrast to the hydrosystem’s collaborative approach, this plan is being developed behind closed doors with only the parties to the *United States v Oregon* proceeding. The harvest management plan also must incorporate the best available science and apply the same legal standards as the hydrosystem Biological Opinion if these fish are to have a true chance to survive and prosper. The harvest BiOp is to be issued on May 5th simultaneous with the hydrosystem BiOp. RiverPartners and others in the region will be evaluating and commenting on that plan to ensure the benefits and gains made with the hydro salmon plan are not simply lost to added harvest pressures.

##