

PACIFIC FISHERY MANAGEMENT COUNCIL

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July 7, 2003

Ms. Magalie Roman Salas, Esq.
Office of the Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Dear Secretary Roman Salas:

Re: Priest Rapids Hydroelectric Project Draft License Application FERC No. 2114

The Pacific Fishery Management Council (Council) is writing to comment on the Draft License Application for the Priest Rapids Hydroelectric Project (FERC No. 2114).

Essential Fish Habitat Consultation Mandate

As you know, in making hydropower project relicensing decisions, FERC must meet its responsibilities regarding conservation of essential fish habitat (EFH). Such responsibilities include consultation with the National Marine Fisheries Service (NMFS) to assure minimization of acute and cumulative impacts on salmon and other anadromous fish from hydropower operations and structural configurations, as well as providing a detailed response to Council comments on FERC actions that affect EFH.

This EFH mandate is also consistent with the 1986 Electric Consumers' Act and the 1980 Northwest Power Act, which require FERC to take a balanced approach to hydropower project licensing. These Acts require that when deciding whether to issue a license, FERC consider not only the power generation potential of a river, but *give equal treatment to energy conservation, protection of fish and wildlife, and general environmental quality*. This mandate requires FERC to consult with federal, state, and local resource agencies and Indian tribes, including fish, wildlife, recreation, and land management agencies, in order to assess the impact of a hydropower project on the environment.

While the Priest Rapids and Wanapum dams have a variety of impacts to different stocks of fishes, the Council is specifically concerned with the fall chinook salmon spawning in the Hanford Reach section of the Columbia River. These fish contribute to ocean fisheries from Alaska to California as well as support Columbia basin inriver fisheries.

As stated in the draft license application, the 1988 Vernita Bar Agreement has been beneficial to protect redds and incubating eggs. The Council is supportive of efforts by the state, tribal, and federal fisheries managers to refine and expand the Vernita Bar Agreement in a way that offers more protection for fish.

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However, the Vernita Bar Agreement does not cover flows needed to protect newly emerged fry, which can be stranded in shallow pools along the river edge. When flows fluctuate quickly, thousands of fish can become stranded and often die. The licensee has proposed ramping/flow targets to reduce mortalities. We believe that these proposals should be further refined and broadened to include the operations of the upstream federal and PUD projects.

FERC should include and strengthen protective measures such as those in the Vernita Bar Agreement during relicensing to protect spawners and redds. Additionally, the Council requests that the ramping/flow targets identified in the system operation requests (SOR 2003-7 and 2003-8) made by the Technical Management Team be met in the relicensing agreement to adequately protect juvenile rearing.

Finally, the Council has attached a letter outlining its concerns for all FERC relicensing projects. We reiterate these previous comments by this attachment for incorporation in the Priest/Wanapum Relicensing process.

The Council appreciates this opportunity to comment. We appreciate your attention to our concerns and suggestions.

Sincerely,



Hans Radtke, Ph.D.
Chairman

JDG:rdd

c: Council Members
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Salmon Advisory Subpanel
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