

9 July 2005

Bruce Measure
Northwest Power and Conservation Council
Old Board of Health Building
Box 200805
Helena, MT 59620

Dear Council Member Measure:

Montana Trout Unlimited, a state affiliate of Trout Unlimited national, represents 3,200 conservation-minded anglers organized in 12 volunteer chapters around the state. Our members, especially those in our chapter in Lincoln County, the Kootenai Valley Trout Club, have long been concerned about how the federal hydroelectric system in western Montana affects coldwater habitats and fisheries. Most prominently, we are concerned with how operations and water management at the Hungry Horse and Libby projects can be better balanced to accommodate flood control, reservoir recreation, ecosystem health, resident and listed fish species in Montana, power production and demands for conservation and recovery of troubled salmon and steelhead stocks in the Columbia River system. In our evaluation of this balance, we have looked at some of the available science, ESA-related biological opinions, recent judicial decisions, historical operations and economic demands on the power system. In addition, in order to better understand the complex scientific, economic and political landscape surrounding operation of the federal system, we have discussed Montana concerns with TU colleagues elsewhere in the Northwest as well as with federal and state agency staff, and the last three state administrations in Montana.

Based on this background, and our personal familiarity with the Kootenai and Flathead River systems, we support the Systems Operations Request Montana recently submitted to guide water management this year at the Libby and Hungry Horse projects.

These measures were essentially incorporated in the Mainstem Amendments adopted in 2004 for the Power and Conservation Council's Fish and Wildlife Plan. Importantly, understand that our national organization, which is one of a number of plaintiffs in litigation challenging the 2000 and 2004 biological opinions for Columbia River salmon, supports the views of its Montana membership. This support was evident when the plaintiffs in their injunction request to Judge Redden in the recent BiOp litigation specifically excluded augmentation flows from Montana in their request for relief.

It is our view that the proposed operational model, especially at the Libby project -- flat flows through August and September, with a gentle ramp down into fall culminating in a draft 20 feet below full pool – can provide measurable benefits to the aquatic communities of the river and reservoir, including listed Kootenai white sturgeon and bull trout; candidate species westslope cutthroat and burbot; and recreationally important wild populations of river-dwelling rainbow and reservoir populations of introduced kokanee. We also believe, indeed we can document, that the proposed operations in the Montana SOR would benefit the nascent and sustainable river-related business that is emerging in economically troubled Lincoln County.

Though we support Montana's SOR, we do not reject the notion that a positive relationship exists between survival for outmigrating Snake River and upper Columbia salmon and steelhead and increased travel time with lower water temperatures in mainstem reservoirs. Still, we have come to conclude that the small amount of water Montana's reservoirs can realistically contribute for flow augmentation has at best a nominal and nearly impossible-to-measure effect on fish movement that occurs hundreds of miles downstream below several other large upper Columbia reservoirs. Certainly any positive contribution Montana's reservoirs can contribute, if it's even measurable, is outweighed by the harm augmentation schemes incur on our state's resident fisheries. Notably, our primary concern stems from discharges that include dramatic, unnatural double-peaks in the August hydrograph. These have been followed by abrupt September ramp-downs that occur when the biological production in our northwest Montana rivers is still significant.

We acknowledge and are supportive of fishery conservation interests on the Snake and mainstem Columbia Rivers. And thus we encourage the State of Montana to take a fresh and objective look at region-wide, measurable and systemic improvements in the Columbia Basin hydro system that can better benefit both salmon and Montana's resident fish. We'd be willing to discuss these in greater depth with Gov. Schweitzer and the Power and Conservation Council.

Montana TU is also ready to assist in any effort that leads to improved diplomacy and more agreement on solutions.

Sincerely,

Bruce Farling
Executive Director

cc. Rhonda Whiting
Hal Harper
Jeff Curtis
Tim Linehan
Tom France