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20 July 2007

Patty O'Toole
Program Implementation Manager
Northwest Power and Conservation Council
851 SW 6th Avenue, Suite 100
Portland, OR 97204-1348

Re: Innovative Project selection and Project #2000753500

Dear Patty:

Montana Trout Unlimited is writing to urge the Northwest Power and Conservation Council to recommend funding for Innovative Project #2000753500, which involves field testing of a flow velocity enhancement system. The Independent Scientific Review Panel ranked this project "B-1," fundable, but not necessarily meriting funding given the 5 priority projects it ranked above it, as well as the three other lesser priority "B" projects that are competing for resources.

We have no special expertise in this particular technology, but our examination of the technology and the hypothesis behind the proposed testing indicates it has real potential for success. If it meets muster in a pilot application it could prove to have large-scale, cost-effective applicability for guiding salmonids safely around obstructions such as dams and irrigation diversion structures. Dealing with these types of barriers to fish movement is a major challenge to native fish conservation in our state – and one Montana TU deals with regularly.

Importantly, this technology also has the potential for improving survival for downstream migrating salmon smolts as they attempt to navigate slackwater reservoirs in the Columbia River basin. If this flow velocity system can reduce travel time and increase smolt survival in reservoirs, then not only will salmon recovery benefit but so potentially could conservation of resident and native fish in Montana. Presently the operative – but contested – federal Biological Opinion for Columbia River salmon and steelhead calls for flow augmentation from federal hydro facilities in Montana's Flathead River and Kootenai River system. Augmentation flows have produced significant tension between interests supporting resident fish in our state and interests downstream and here who desire to restore the Columbia system's imperiled salmon and steelhead stocks. You

are undoubtedly familiar with the issue: Flow augmentation, because it departs so much from normative river conditions and can reduce reservoir productivity, is putting Montana's resident fish, including listed species, at risk in exchange for a marginal benefit at most for Columbia system anadromous fish.

We think it is good business to seek alternatives that can better guide migrating smolts through downstream reservoirs while reducing or even eliminating demand for augmentation flows that provide limited benefit downstream. Further, if this technology proves successful at guiding smolts to surface collectors, bypass channels and fewer spillway bays, it could reduce the need for salmon-related spills at mainstem dams, thereby enhancing hydroelectric revenues and potentially reducing gas super-saturation impacts in some tailwaters. At \$318,000, the proposal for testing a flow velocity enhancement system could be an investment well worth the money.

We recognize the council is confronted with the puzzle of funding nine proposals that total \$16 million when only \$2 million is available. We recommend the council work with BPA to increase funding for this fiscal year, and then to re-examine the top-rated proposals for opportunities to pare the funding request for individual proposals. In that way it might be possible to fund most of the projects in the A-1, A-2 and B-1 categories, including the flow velocity enhancement proposal, albeit at less than requested. As a reviewer for other programs that fund fishery restoration, I can attest that there is always something that can be pared without compromising the objective of a proposal.

Thanks for the opportunity to comment. We urge the council to fund the proposal for the Flow Velocity Enhancement System.

Sincerely,

Bruce Farling
Executive Director

cc. Bruce Measure
Rhonda Whiting