

# DRAFT

January 20, 1989

Northwest Power Planning Council

851 SW Sixth Ave.

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Portland, OR 97204-1348

Gentleman:

The Idaho Chapter of the The Wildlife Society, an organization of about 250 professional biologists, appreciates the opportunity to comment on the Staff Issue Paper - Wildlife Mitigation Planning (88-10).

We have familiarized ourselves with the Northwest Power Act, the planning procedures developed by the Power Council, the methods used to identify impacts, the wildlife impact assessments, and the mitigation plans completed to date for Idaho's three hydroelectric projects.

We offer the following summary comments regarding the specific issues identified in the order presented on page 2 of the issue paper:

1. Wildlife mitigation should receive just as much priority as fisheries mitigation. The Act and Congressional intent are clear in this regard.

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2. There is some rationale for better defining the wildlife program policy goals and objectives, and the Council should undertake this effort. However, the Council need only establish general goals and objectives. We see no utility in establishing technical or policy committees to assist in the process. The Council's staff is capable of drafting these goals and policies. With agency, tribal, and public involvement, the Council could then decide the goals and policies which should be amended into the program.

The Council certainly needs to more fully address the potential costs of the program, mechanisms to fund mitigation, and time frames for funding. We recognize that the costs are probably higher than anticipated. Nevertheless, the current budget for wildlife mitigation is small in relation to the fish mitigation budget, and in terms of ratepayer's costs. The wildlife mitigation budget could be enlarged substantially without undue burden on ratepayers.

Related to the issue on the planning approach (i.e. basinwide vs. project-by-project), we feel that regional goals and objectives are being and will be met through the current project-by-project approach. The interagency teams which are involved in the planning process are represented by professional biologists from a number of agencies which carry local, regional, and national perspectives to the teams.

There is good rationale for a basinwide approach from the fisheries perspective because of the additive effects that each project had on an anadromous fish resource. However, the impacts to wildlife were largely confined to the area in the vicinity of each project. The wide variations in geography and environments over the Pacific Northwest would make it very difficult to develop meaningful analyses of impacts for a large number of wildlife species affected by a large number of projects. In turn, such an approach would result in undue complexity in identifying and communicating the needed mitigation. The project-by-project approach is a much more manageable and clear-cut way to handle the program.

We feel strongly that the habitat based method used to describe impacts and proposed mitigation is sound. It is straight forward, widely tested and applied, and defensible. We recognize that it is not perfect. Nevertheless, consider that it represents the consensus of professionals. You should feel confident, as we do, that it represents the best available approach to determining impacts and mitigation. A population approach, which is advocated by some people, adds the additional complexity of a myriad of other biotic and abiotic factors which may be influencing a particular population at any point in time. This makes it more difficult to identify the factors responsible for losses caused by the projects and to justify mitigation. The issues are complex enough without adding additional problems.

We see no basis from those that argue that not enough is being done for threatened and endangered wildlife. Idaho's plans certainly do not reflect such a bias. Mitigation is proposed for peregrine falcons, bald eagles, and other rare species.

3. The wildlife mitigation proposals submitted from Idaho should be amended into the fish and wildlife program as described in Alternative 1. The development of general program goals and objectives should not delay your decision to enter rulemaking and amendment to the program. These hydroelectric facilities have been in place, unmitigated for 30 to 70 years. The mitigation plans have been completed for over a year. They were prepared in accordance with the Council's procedures, using accepted methods, and the interagency teams have identified losses and have presented reasonable and justifiable mitigation. We see no reason to delay implementation any longer. Further delay may jeopardize some projects and will also likely result in higher implementation costs.

Related to the acquisition issue, we hope the Council does not adopt a policy to limit the use of this mitigation tool. The development of hydroelectric facilities frequently affected habitats which are in short supply including wetlands, riparian areas, and big game winter ranges. Many of these crucial wildlife habitats are in private ownership and some are under threat of conversion to other uses. Acquisition is a vital tool to mitigate for these losses and frequently accomplishes the greatest good for society at the lowest cost. We support the concept of land acquisition only on a willing seller basis.

- 4. We reviewed the paper on the wildlife mitigation requirements of the Northwest Power Act, prepared by Idaho Deputy Attorney General, Susan Mattos. We support the conclusions of that paper. We feel that the Act requires full protection, mitigation and enhancement for wildlife and that Bonneville should be the primary source for funding the program. As the Deputy Attorney General concludes, BPA expenditures can be reimbursed by the other beneficiaries of multipurpose projects.

The Congressional repayment formula appears to be the logical method of determining the amount of reimbursement from the various purposes for wildlife mitigation at multipurpose facilities.

However, delaying adoption of the mitigation plans to resolve this issue is neither necessary nor desirable from our point of view.

- 5. If the Council decides that more time is needed before it make its final decision on the pending mitigation proposals, then we suggest that all the Idaho projects that involve acquisition be allowed to proceed. At least two significant acquisition proposals identified in Idaho's plans are no longer feasible because of existing delays.

Again, thank you for the opportunity to comment on the issue paper.

Sincerely,

Jack Connelly,  
President