



## ATTACHMENT 2

October 25, 1999

Todd Maddock, Chair  
Northwest Power Planning Council  
851 SW 6th Avenue, Suite 1100  
Portland, OR 97204-1348

Dear Chairman Maddock:

The Columbia Basin Fish and Wildlife Authority (CBFWA) is requesting the Northwest Power Planning Council (NWPPC) reconsider its pending denial of funding for Project #20143, "Monitor Symptoms of Gas Bubble Trauma in Adult Salmonids." Although CBFWA and the Independent Science Review Panel (ISRP) recommended funding for this project, it is our understanding the NWPPC staff is recommending rejection of this project for three reasons. The following discussion reiterates the NWPPC staff points as we understood them and provides a response for your consideration.

1. *Monitoring results of recent years have indicated there is no adult problem resulting from the current spill program.*

The spill program is not static but is dynamic. The 1998 Supplemental Biological Opinion increased the spill in the Federal Columbia River Power System (FCRPS). Additionally, the 2000 program may include changes such as spill at John Day Dam and a substantial increase in daytime spill at Bonneville Dam. These changes will increase total dissolved gas in the river and subject adult salmon to an increased risk of gas bubble disease (GBD).

2. *The adult monitoring program has been minimal and is not statistically defensible.*

While it is true that the adult monitoring effort has been minimal, it must be recognized that the adults sampled at Lower Granite and Bonneville are caught to serve other studies. The gas bubble monitoring was secondary to those studies but useful as an indicator to aid management of the spill program. To account for the lack of statistical robustness the spill program action criteria are very conservative. That is, any observation of GBD signs in adults requires an in season review and a probable reduction of spill. Statistical rigor is not necessary to determine presence or absence of gas bubbles in the adult populations. Additionally, very few projects monitor GBD in adult salmonids and this

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has been identified as an information gap by the ISRP and one the CBFWA fish and wildlife managers feel is important in making management decisions on spill.

3. *The state water quality agencies do not require adult monitoring.*

The water quality agencies are not the only agencies responsible for the health of aquatic resources. The National Marine Fisheries Service (NMFS) shares this responsibility with the states and other federal agencies. The Biological Opinion Spill Program is the cause of dissolved gas exceeding the water quality criteria when voluntary spill is implemented. Therefore, NMFS closely monitors the health of our primary concern, the listed salmon species.

We hope that the NWPPC will reconsider the earlier decision and allow the funding of this project. If this letter generates questions or need for further clarification please contact Dr. Mark J. Schneider, Fish Facilities Branch Chief, National Marine Fisheries Service.

Thank you for your continuing support.

Sincerely,



Brian Allee, Ph. D.  
Executive Director  
Columbia Basin Fish & Wildlife Authority

cc: Bob Lohn, NWPPC  
Gustavo Bisbal, NWPPC  
Fish & Wildlife Managers  
Caucus Chairs

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