

THEODORE R. KULONGOSKI
GOVERNOR



June 12, 2007

Dr. Tom Karier, Chair
Northwest Power and Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, OR 97204

Dear Dr. Karier,

I understand the Northwest Power and Conservation Council will take up two issues on its June agenda: Willamette wildlife crediting and the CHAP process recommendation.

The Northwest Power Act of 1980 requires the Council to adopt a program to "protect, mitigate and enhance fish and wildlife affected by the development and operation of the Federal Columbia River Power System."

The Council's 1989 Wildlife Rule quantified wildlife losses for construction and inundation at the federal dams for a variety of species. The Council continued to carry the loss statements from 1989 in the 1993 Wildlife Rule and the 1995 and 2000 Fish and Wildlife Programs.

The Willamette Basin loss assessments from eight hydro facilities on the Middle Fork, McKenzie, and Santiam River drainages lists harm to 16 vegetation cover types and 19 wildlife species. The Willamette projects "inundated, extensively altered, or affected 33,407 acres of land and river" including "17,800 acres, 60 miles of river, and an undetermined number of miles of tributary streams that were inundated." The Willamette Basin lost "5,184 acres of late successional or old-growth conifer forest, 2,850 acres of riparian hardwood stands, 2,180 acres of shrubland, 1,526 acres of sawtimber, 1,290 acres of grass-forb communities, and 1,266 acres of pole-size conifer forest." The Willamette lost 94,306 Habitat Units because of construction and inundation by the federal projects.

Habitat Units make up the currency of the Council's Fish and Wildlife Program. The Program defines losses in terms of Habitat Units, not inundated acres, ratios or other methods. To change from calculating and crediting losses to a method other than Habitat Units would require the Council to amend its current Program.

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Willamette Basin mitigation sponsors developed several proposals in the FY07-09 process to use an alternate wildlife and habitat suitability assessment method, the Combined Habitat Assessment Procedure (CHAP). The CHAP method appears to provide certain advantages over Habitat Evaluation Procedure (HEP) in the Willamette to assess properties to mitigate for identified losses, to calculate the number of habitat units to credit for those properties, and to develop better management plans for properties purchased. In short, the CHAP approach appears grounded in better science than the HEP methodology used by your Program.

Though it appears it would take a Program amendment to change the currency for expressing and crediting against wildlife losses, the Council is not constrained by the Program to employ the HEP method of calculating loss assessments. Because CHAP may provide some clarity in calculating these losses, the Council should consider using this tool. As it pertains to the Willamette, CHAP could provide a better method to calculate the value of properties used to mitigate for the Program defined losses. I ask the Council to support the use of CHAP to calculate these loss assessments.

As you might be aware, the State of Oregon and our tribal government co-managers formed a coalition to negotiate a settlement with Bonneville Power Administration for wildlife claims throughout Oregon. We consider those negotiations a matter between the coalition and Bonneville. The Council should support the potential settlement of the Oregon's wildlife losses by standing aside and allowing the pertinent parties to negotiate the issues involved in this settlement.

Sincerely,



Michael Carrier
Natural Resources Policy Director

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