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Idaho Conservation League

Bonneville Power Administration
Public Affairs Office - DKE-7
P.O. Box 14428
Portland, OR 97293-4428

November 7, 2011

Subject: Kootenai Tribe of Idaho Native Fish Aquaculture Program

Dear Mr. Gresh:

Thank you for considering our comments on this project. Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 20,000 supporters, many of whom have a deep personal interest in protecting human health and the environment.

Given the extremely low number of wild burbot and sturgeon remaining in the Idaho portion of the Kootenai River, it is critical that steps be taken to prevent their extinction. We applaud the efforts of the Kootenai Tribe in taking a lead role in working to recover depressed populations of burbot and sturgeon in the Kootenai River.

While one of the primary environmental concerns related to hatcheries is the discharge of water pollutants, it is our understanding that the proposed hatchery facility will not meet the minimum levels of discharge normally requiring an NPDES permit. The environmental analysis should detail this information, and describe if any mitigation measures are otherwise necessary to meet the TMDL for the Kootenai River Basin.

Another general concern with hatcheries is that the genetic stock used for hatchery production may ultimately dilute or deplete the wild genetic strains. However, given the very low number of wild fish remaining, there is no other option but to augment the wild populations with hatchery-reared fish. In speaking with the Tribe's biologist, the hatchery stock will come from Moyie Lake, which is likely very similar to wild Kootenai fish. Methods of integrating the wild genetic stock are also being considered to prevent its entire loss.

During the construction phase of the hatchery, we encourage the Tribe to work with relevant state and federal agencies to develop and implement appropriate best management practices and mitigation measures, designed to prevent or minimize impacts to water quality. For example, silt fences or other barriers to erosion and sediment delivery should be considered.

Once again we thank you for the opportunity to submit comments on this project. Please feel free to contact me if you have any questions or require additional information. I can be reached by phone at (208) 265-9565 or by e-mail at bsmith@idahoconservation.org.

Sincerely,



Brad Smith
Conservation Associate

Cc: Sue Ireland, Kootenai Tribe of Idaho