



Idaho County Light & Power Cooperative Association, Inc  
February 10, 2000

Federal Caucus Comment Record  
C/o BPA-PL  
707 W. Main Street, Suite 500  
Spokane, WA 99201

Re: Comments submitted on the Federal Caucus All-H Paper report  
Federal Caucus Public Hearing, Clarkston, WA

Gentlemen:

Thank you for the opportunity to comment on your "All-H Paper" report and for providing this forum for public dialogue on these very important issues.

I am the general manager for a small rural electric cooperative, the Idaho County Light & Power Cooperative. Our utility is a requirements customer of the Bonneville Power Administration, providing electrical service to approximately 3,000 member/consumers located, primarily, in the unincorporated areas of Idaho and Lewis counties, Idaho.

I make the following statements on behalf of the economic interests of the cooperative and its members, on behalf of the cooperative's board of directors and on behalf of myself as a lifelong resident of North Central Idaho.

We are categorically opposed to dam removal as an option for salmon recovery. We are also categorically opposed to taking any more of Idaho's water as an option for salmon recovery.

The basis for each of these positions are the same:

- 1) Increasing scientific evidence that neither of these options will ensure salmon survival or even greatly improve salmon survival over other viable options, and
- 2) Both will have devastating impacts upon the socio-economic fiber of the Pacific Northwest.....the focal point of that impact landing squarely on the industries and residents of the greater Lewiston/Clarkston area.

Having stated my position up front, I would like to offer more specific comment on the Paper's goals and objectives.

Regarding the "Conserve Species" goal: Certainly, we can and should endeavor to avoid extinction and foster long-term survival and recovery. However, we cannot will it or ordain that it shall be. At best, we can only attempt to assist nature. I recommend that the word "endeavor" be included in this stated goal.

Regarding the "Conserve Ecosystems" goal: Again, I recommend that the word "endeavor" be included in this stated goal.

Regarding the goal to "Assure Tribal Fishing Rights": Certainly, we can do this. We can create law and enforce man's law upon man. What we cannot do, and should not expect to do, is to enforce man's law upon nature. Law and treaties can require that a certain abundance of fish belong to the tribes before other members of society. But, if nature ultimately does not provide the required abundance...what then? Do we sue nature? Do we sue ourselves if we have made a good faith effort? What is to be gained by doing so?

Regarding the goal to "Balance the Needs of Other Species": Include the word "endeavor".

Regarding "Minimize Adverse Effects on Humans": Shouldn't our objective be to maximize our efforts for the best outcome of a combined relationship for all wildlife and humans, rather than to defensively be trying to minimize adverse effects on one or the other? This, after all, is the mandate of the Regional Power Act of 1980...to "protect, mitigate and enhance fish and wildlife...while assuring the Pacific Northwest an adequate, efficient, economical and reliable power supply." This goal should be changed to read, "Maximizing the Effects of a Balanced Relationship for Humans and Wildlife". Let me add that the Act also requires measures included in the program to "utilize, where equally effective alternative means of achieving the same biological objective exist, the alternative with the minimum economic cost."

I will close with my recommendations of preference for those options as outlined in the "All-H Paper".

On Habitat, I generally support Option 2, "Coordinated Regional Plans". Coordination of our regional entities is the key. And, selecting economically feasible and effective programs will be the bread and butter of a successful regional effort. The downside is that this can only be effective in an environment free of frivolous and obstructive litigation. This may be too much to hope for.

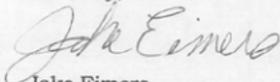
On Harvest, I generally support Option 3, "Conservation Fishery Levels". In this vein, I believe that cooperative efforts can be much more effective and much less onerous than regulatory pursuits.

On Hatcheries, I do not have enough information to state a preference.

On Hydro, I of course support Option 1, "Current Program". With no more Idaho water used for spill, and preferably less. I could also support a hybrid of Option 1 & Option 2 that did not include any increased flow augmentation but that would seek increased funding to pursue more aggressive implementation. As long as that increased funding was not added to our rate-payers already considerable contribution.

Once again, thank you for this opportunity to comment.

Sincerely,



Jake Eimers  
General Manager