

February 28, 2000

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MAR 02 2000

Corps of Engineers
201 North Third Avenue
Walla Walla, WA 99362-1876
Fax to (509) 527-7832
Email: salmonstudy@usace.army.mil

RE: Comment on the Draft, Lower Snake River Juvenile Salmon Migration
Feasibility Report/Environmental Impact Statement-February 17, 2000

Dear Sirs:

We are members of the Othello School Board. 10,000 people live within the School District we represent. All are dependent upon Columbia River water.

We are here in support of EIS Alternative 1 or Alternative 2 with one caveat: all salmon recovery actions must have significant benefit to salmon recovery. We repeat--must have **significant** benefit to salmon recovery. Wild experiments are unacceptable. In addition, we oppose breaching of dams because that provides no benefit to salmon recovery. Stop all study of a McNary drawdown.

Spring flow augmentation is the largest salmon recovery effort on the Columbia and Snake Rivers. This effort accounts for 1/4 of the total Columbia and Snake River salmon recovery effort. Each year 100 to 180 million dollars are sunk into spring flow augmentation.

1 Please notice the chart attached to this letter titled NMFS/UW Survival Data, 1994-96. The chart clearly shows that there is no relationship between flow and survival rates. Notice the large flow variation, and that the survival rates stay the same during each year. There is a truckload of data in the basement of the NMFS Center in Seattle backing up this presented chart. The one sure thing proven by Columbia and Snake River salmon recovery efforts is that there is no benefit from spring flow augmentation! Why is this water resource wasted by flow augmentation? What are the cost/benefits of spring flow augmentation and any other flow augmentation? This so-called water crisis is an administrative water crisis. Why is there an administrative water crisis on the Columbia River?

All flow augmentation for Columbia and Snake Rivers must be reduced to 4 million-acre feet or less, which is more than adequate. The current augmentation up to 16 million-acre feet is a waste and without benefit. We believe it is illegal to waste resources in this manner.

2
Irrigation withdrawals on the Columbia River are insignificant. Please note the attached chart titled "Columbia River Inflow at Grand Coulee Dam with Columbia Basin Irrigation Withdrawal at Banks Lake". This chart uses average data from the Bureau of Reclamation. This chart shows that more than 97% of the Columbia River water at Grand Coulee Dam remains in the River. Consider the proven facts that there is no flow/survival relationship for juvenile salmon, and the insignificant portion of Columbia River water used for irrigation (about 2.7 million-acre feet). Why then is there a moratorium on Columbia River water withdrawals in each of the following areas? The moratorium prevents proper mixing of land applied spray field water. The moratorium prevents necessary irrigation. The moratorium prevents city and county citizens from increasing water use that is needed for residences, schools and hospitals. The moratorium is unnecessary for salmon recovery and should be abandoned as a wild experiment.

Sincerely,

Mike McQuate Chairman
Shannon McKay vice chairman

Directors of the Othello School District

CC: Honorable Bill Clinton, President of the United States
1600 Pennsylvania Avenue
Washington, D.C. 20500

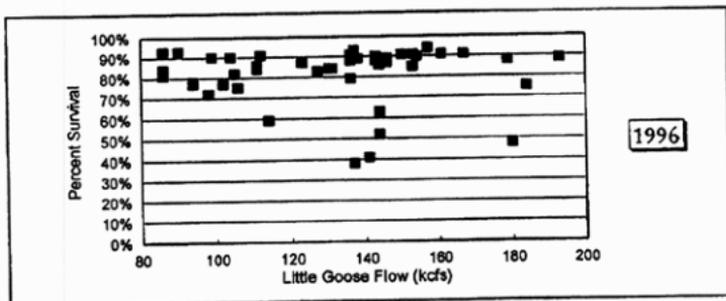
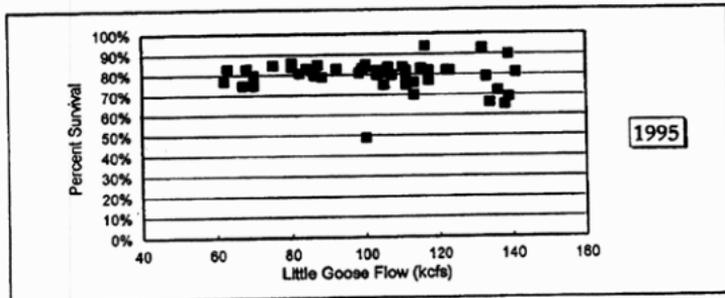
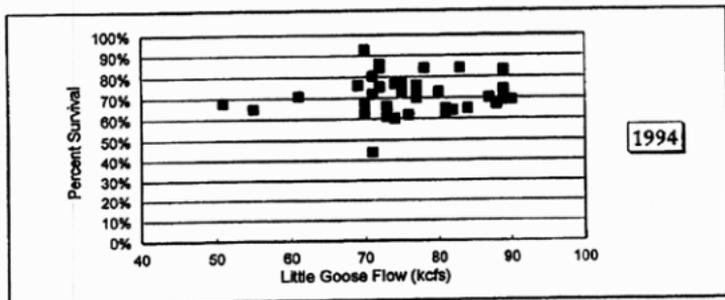
Senator Slade Gorton
730 Hart Senate Office Building
Washington, D.C. 20510

Senator Patty Murray
173 Russell Senate Office Building
Washington, D.C. 20510

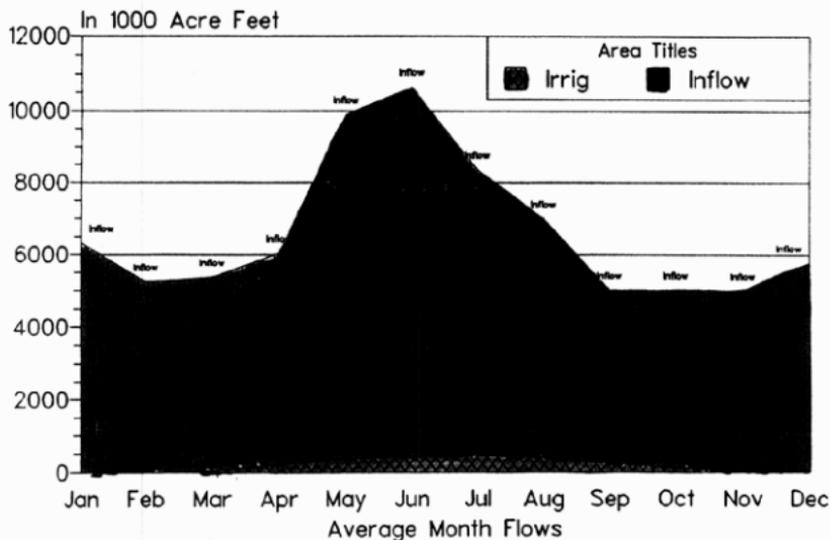
Representative George R. Nethercutt, Jr.
1527 Longworth House Office Building
Washington, D.C. 20515

Representative Doc Hastings
1323 Longworth House Office Building
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Figure 10. NMFS/UW Survival Data, 1994-1996
 Survival Rates for Juvenile Spring Chinook Release Groups
 (L. Granite Tailrace to L. Monumental Tailrace)



Columbia River Inflow at Grand Coulee Dam
with
Columbia Basin Irrigation Withdrawal at Banks Lake



Lower Snake Dam Removal Annual Scenario
Estimate of Retail Power Cost Increase

1998 BPA Gross Revenue	\$2,313,325,300 ¹
Snake River Dams Net Generation Contribution	<u>210,000,000</u> ²
BPA Gross Revenue Without Snake River Dam Resource	<u>\$2,103,325,300</u>
Price Increase Factor - Due to Lost Snake River Dam Resource	1.09984 ³
BPA Gross Revenue Adjusted Without Snake River Dam Resource	\$2,313,325,300
New Replacement Power Cost	<u>271,000,000</u> ⁴
New BPA Gross Revenue - Including New Replacement Power Cost	<u>\$2,584,325,300</u>
BPA Wholesale Price Increase Including Lost Resource & New Power	11.715% ⁵
Othello School District Annual Power Cost for 1998	\$188,000
Estimated Othello School District Cost of Power Increase Caused by Removal of the Lower Snake River Dams (Retail)	<u>\$11,012</u> ⁶

¹ 1998 BPA Annual Report

² Net generation contribution = Average BPA wholesale value of power produced by the four Lower Snake River Dams less operation and maintenance reimbursement from BPA to the Corps of Engineers for power production.

³ Required BPA price increase to maintain current spending levels. Assuming BPA costs will stay the same after the Lower Snake River Dams are removed. Most likely costs will increase because of the following announcement in the Columbia Basin Bulletin. "The Bonneville Power Administration on Dec. 21, 1998 unveiled its strategy for selling electricity in a way the agency says will cover up to \$721 million a year in fish and wildlife obligations for the 2001-2006 period". The current fish and wildlife expenditures are \$435 million each year.

⁴ The wholesale cost of power to replace the power that is generated by the Lower Snake River Dams. "The hydropower impact is now estimated at \$251 million to \$291 million on an average annual basis using a medium forecast, which is the most likely outcome," said Ed Woodruff, regional economist for the Army Corps of Engineers' Northwest Division, and leader for the hydropower work team. "This is the cost to make up for the power and system reliability that would be lost if the four dams were removed". \$271 million dollars is the replacement cost used by the Corps of Engineers dam removal presentation given at Pasco February 17, 2000.

⁵ Estimated percent wholesale power cost increase. This estimate assumes current spending levels will continue, the value of the lost resource and replacement cost of the power produced by the Lower Snake River Dams.

⁶ Big Bend Electric cost for delivery of the wholesale power to retail customers is approximately equal to the cost of the wholesale power. This relationship provides a dampening effect to retail prices when considering wholesale power rate increases. This estimate assumes that delivery charges of Big Bend Electric will remain unchanged.