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WASHINGTON STATE POTATO COMMISSION  
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March 15, 2000

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

RE: COMMENTS ON ALL-H PAPER

Dear Federal Caucus Representative:

Thank you for the opportunity to comment on the All-H Paper and salmon recovery efforts in the Pacific Northwest. My comments reflect the views of the Washington State Potato Commission (Potato Commission) - an organization that represents potato growers throughout Washington State. Most of the potatoes in Washington State are grown in the Columbia Basin and rely on irrigation water and affordable power from the Columbia and Snake Rivers. Potatoes are the second largest crop grown in the state with an annual farm production value of approximately \$500 million. Washington State accounts for nearly one-third of all potatoes (including both processed and fresh) exported from the U.S., totaling nearly \$500 million in potato exports from the Ports of Seattle, Portland, and Tacoma in 1999. The Columbia Basin is the number 1 producing area of French fries in North America. In summary, Washington State potato growers, packers, and processors create thousands of jobs locally in Washington State and generate approximately \$2.5 billion annually to the state's economy.

Because of the devastating impacts that dam breaching and massive flow augmentation would have on the Washington State potato industry, rural communities in Eastern Washington and the Pacific Northwest agricultural community, the Potato Commission wants to take the opportunity to provide comments on salmon recovery efforts.

The recently released studies and series of public meetings were designed to talk about how to save fish. Citizen Update Issue 2 indicated that the options and alternatives were being presented to stimulate public discussion of what the region can do to recover salmon and steelhead and other aquatic species. We believe this is what the debate is all about, or what it should be about. It is not about finding the rationale for taking out dams. Let me be clear. We all care about salmon. But I also care about having a healthy economy and Washington State potato industry. Fact is, this is not a fish versus economy issue. Fish are important.

The economy is important. Since both are important, we need to take seriously our responsibility to protect both – and – do what is right for both.

We applaud the Federal Caucus for attempting to shift the debate toward finding a comprehensive solution as described in the All-H Paper. If we are to be successful in solving problems associated with the complex life cycle of the salmon, we need to be addressing the impacts on all parts of that life cycle. Attacking one H – as was the case with hydro in the public hearings – will not solve the problem and will be a careless, expensive and wasteful experiment that won't get results. The Citizen Update Issue 2 describes the deterioration of the Columbia's once-numbered fish runs as a result of economic development of the basin and then reinforces the fact that addressing all the H's is the only way to resolve the problem. We agree.

The All-H Paper begins to define goals and performance standards. The region needs to know what we are trying to accomplish – a recovery plan with a clear vision, goals and priorities – before making decisions. That's the sensible, responsible thing to do. While I am encouraged by this discussion of goals, the ones outlined in the All-H Paper appear to be in conflict and, therefore unattainable. For example, the fifth goal is to minimize adverse effects on humans. Removing dams doesn't minimize adverse effects on humans. This action would increase air pollution as a result of using more trucks and railroad cars for transporting commodities, increase overall cost of production as a result of higher power rates for growing and processing crops, eliminate barging and eliminate jobs. The Citizen Update Issue 3 indicates that electricity rates throughout the Pacific Northwest would increase between 1.9 percent and 6.7 percent. While this doesn't seem drastic to a residential consumer, let me assure you this is drastic to an irrigator and food processor. With increasing competition from food processors in Alberta, Canada, increases in power rates would decrease our competitiveness and could result in processors moving production to Alberta, Canada where power rates would become relatively more competitive. In addition, the instability of power supply and rates that would result from the elimination the lower Snake River Dams would provide a climate of uncertainty to businesses, farms, and food processors in the Columbia Basin of Washington and Oregon.

The competing goals of conserving species and providing a sustainable harvest also need to be resolved. The Citizen Update Issue 2 describes one element of decline in fish populations to the advent of canning technologies in the late 1800s. The publication also discusses deliberate decisions made during development of the hydropower system that required the system to compensate for effects of the development on fish and fish habitat and to develop hatcheries as a way to supplement fish populations for harvest. The practice of deliberately killing "surplus" hatchery salmon that return to spawn and selling the eggs for fish bait has become the topic of a recent controversy. Compensating for hatchery operations in order to increase fish populations, yet killing "surplus" fish sets up fisheries management practices that are in conflict and must be resolved.

The All-H Paper provides a full range of options for most H's, with the exception of hydropower. The hydropower options continue to focus on dam breaching and flow augmentation without consideration for other system improvements. The options for hydropower appear radical in comparison to alternatives for the other H's when you consider

what has happened since construction of the Federal Columbia River Power System, what improvements have already been made, and what results we are seeing with salmon recovery.

- In the past two decades, the region has pursued a number of recovery actions – yet salmon and steelhead populations have declined throughout Puget Sound, the coastal rivers of Washington, Oregon and California and the Columbia Basin, even in rivers without dams. The U.S. Fish and Wildlife Service lists 608 fish and non-fish species in the region that are under ESA protection.
- Current NMFS research shows increased survival for spring/summer salmon in the Snake and Columbia rivers. Survival rates at each hydroelectric dam, as measured by NMFS, are nearly 95 percent for most years since 1995. This compares with estimates of per project survival for Snake River fish of less than 70 percent during most of the 1970s. Indeed, the survival level through this stretch of the river is approaching the practical upper limit.
- Fish survival through the hydropower system has improved to the point where the NMFS has found that breaching alone, or increases in flow or spill regimes alone, cannot bring these fish populations back.
- The success of the fish transportation effort is outstanding. Survival of juvenile fish that are transported through the system has been measured at greater than 98% and approximately twice as many adults return from transported groups of fish than if they migrate through the reservoirs and hydroelectric dams on the Columbia and Snake Rivers.
- Careful planning of hydro operations during the fall in the mid-Columbia River area are controlling water levels through the Hanford Reach to enhance spawning grounds and provide protection for about 99% of all Fall Chinook redds, significantly increasing the number of emerging fry.
- Irrigation inlets in the upper reaches have been screened to keep salmon from moving into irrigation systems and spawning.
- Marking fish for study has been a great success. The use of radio tags and Passive Integrated Transponder Tags (Pit-Tags) and the detection and deflector system used with them have been key in determining the movement and survival of salmon stocks.
- Hydropower generators have been leaders in developing new technology to improve fish passage at their facilities.

If we continue to focus on breaching the 4 lower Snake River dams without recognizing facts like the ones listed above and without addressing the conflicting goals of fisheries management, we don't have a comprehensive solution and we won't be successful in restoring fish populations. If we continue to focus on one recovery measure, the region will be unsuccessful because there is not a single source of mortality.

It is obvious that our problem is much broader than the current debate over breaching hydroelectric dams on the Snake River. It's a problem that requires a comprehensive solution with achievable, realistic goals for each factor in the salmon life cycle. In addition, we cannot ignore the unknown impacts on fish survival that NMFS identifies as unknown effects of climate and conditions in the estuary and ocean. There is still a great deal that is not understood about survival through the river system and until we gather these facts and add them to the equation, we cannot in good faith impose radical, unproven changes to our river system that have the ability to devastate the economy and way of life.

The region has learned much in the past 20 years, but there is still a lot we don't know. The PATH data has been evolving throughout the U.S. Army Corps of Engineers' study. Biologists are concerned with the PATH results, yet these results are to be used as part of the evaluations. We remain concerned that scientists may not come to agreement in the near term, yet good, credible science is needed to support the best policy decisions for the fish and people of the region. Once the region has set goals and objectives, obtained sound science and begun to implement measures, we suggest including a process for incorporating new information obtained from the planned monitoring and evaluation into the ongoing operations/implementation plan. An effective monitoring and evaluation program will prevent us from making costly mistakes that we will live to regret.

I'd like to comment on the recent public hearings. While I believe they were put in place with the best of intentions, in reality, they may have further polarized the region. We were looking forward to a serious debate about salmon recovery efforts in the Pacific Northwest. But, that didn't happen. Instead, we saw people promoting destructive agendas that offered only one solution -- dismantle our hydropower system. The unfortunate part is that these public hearings were turned into a game of numbers and a game of winners and losers. As a result, people question the integrity of the hearings and public record.

As an example, during this process, we learned of websites that were designed for the sole use of gathering massive numbers of supporters for dam breaching. In the case of [juno.com](#), those opposing radical, risky decisions such as dam breaching found their names on a supporter list merely because they accessed the website. It's a numbers game.

During the process, we learned of efforts to pack the hearings and public comment periods. While a separate room was set up to accommodate the overflow testimony, the result of these actions allowed skewed reports from the media and -- soon -- the hearings too became a numbers game.

Most recently, we learned that American Rivers is using the debate over breaching the 4 lower Snake River dams as a means of raising money and increasing membership. This is no longer about saving fish. It has become a numbers game.

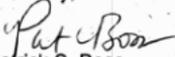
This is not a game. What we do over the next year will affect our way of life in the Pacific Northwest. These decisions will affect our farms, our communities, our potato industry and our economy. This is serious and we urge you to look beyond the political maneuvering, hidden agendas and unfair tactics that have been used in the past couple of months. This kind of activity is counter-productive and is doing nothing but turning us into winners and

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cont. | losers. We urge you to consider meaningful comments that seek to go beyond this – to ways of preserving our salmon resource and Pacific Northwest way of life.

A lot is at stake and these alternatives and study results should be considered carefully. I urge you to base decisions on good, sound science – science that strives to understand survival through the river system as well as the effects of climate and conditions in the estuary and ocean. I urge you to resolve some of the conflicting goals in fisheries management, between ESA and treaty rights and between laws protecting salmon and other species. I also urge you to consider the benefits of our current hydropower system, improvements that have already been made and things we can do now to help solve this problem, rather than continuing to focus on radical, risky ideas like dam breaching. Our lives here are built around these remarkable rivers. They have given us a clean, renewable power source, irrigation for growing our crops, navigation for moving our products to market, recreational opportunities, as well as prevented floods. In closing, we need to seriously consider the devastating impact of dam breaching which will destroy our economy and the lives of thousands of people in the Pacific Northwest

I appreciate the opportunity to comment and look forward to working with others in the region on a comprehensive plan for salmon recovery.

Sincerely,



Patrick S. Boss  
Executive Director

Cc: Washington State Potato Commissioners  
Governor Gary Locke, Washington State  
Senator Slade Gorton, Washington State  
Senator Patty Murray, Washington State  
Congresswoman Jennifer Dunn, Washington State  
Congressman George Nethercutt, Washington State  
Congressman Doc Hastings, Washington State  
Congressman Jack Metcalf, Washington State  
Congressman Adam Smith, Washington State  
Congressman Brian Baird, Washington State  
Congressman Jay Inslee, Washington State  
Congressman Greg Walden, Oregon  
Director Jim Jesernig, Washington State Department of Agriculture  
Bud Middaugh, National Potato Council  
Will Wise, Oregon Potato Commission