

Payette River Water Users Association, Inc.

(A not-for-profit organization)
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Mark Limbaugh
Executive Director

MAR 27 2000

March 22, 2000

U.S. Army Corps of Engineers
Dept of the Army, Walla Walla District
201 N. 3rd Ave.
Walla Walla, WA 99362-1876

To Whom It May Concern:

The Payette River Water Users Association ("Association") is a non-profit corporation representing over 130,000 acres of irrigated farms and ranches located in the Payette River Basin of Idaho. Our members include family farmers, ranchers, municipalities and irrigation companies and districts who rely on water from the Payette River system for their livelihoods and the livelihoods of their respective citizens or customers. Our Association believes our water rights are at risk in the current debate over endangered and threatened salmon and steelhead recovery efforts in the Pacific Northwest. The following comments are meant to express the views of our membership on the issues of salmon recovery raised through the U.S. Army Corps of Engineers (Corps) Lower Snake River Juvenile Salmon Migration Draft FR/EIS.

At the outset, the Payette River Water Users Association concurs with the comments submitted by the Committee of Nine and the Idaho Water Users Association. These comments are consistent with the views of our membership and should be given thorough consideration by the Corps in coordinating and finalizing any salmon recovery effort.

The recovery alternatives that include dam removal on the Lower Snake River or the use of additional flows from Idaho reservoirs for flow augmentation would be very disruptive to the lives of many of our members.

In our opinion, dam removal will not recover the fish and may cause more harm to existing runs than currently estimated. It would take many years for the silt built-up behind these dams to re-settle downstream, a factor not studied thoroughly enough in the debate. The economic hardships caused by removing these dams from service would have a much greater impact than currently estimated. Just the lost source of over 3,000 megawatts of power productive capability would drive prices of electricity in the Pacific Northwest beyond our region's ability to pay, resulting in a huge transfer of money from the existing economy to the electric utilities industry.

1 | Additional water from Idaho for flow augmentation would devastate Idaho's agricultural industry, drying up over 600,000 acres of productive farmland and costing Idaho over \$430 million in lost economy. In addition, flow augmentation has not been proven to be

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particularly effective as a salmon recovery method. As the river is currently situated, there is not enough water produced in Idaho to effectuate prehistoric flow regimes. Flow targets set by federal agencies at Lower Granite are simply not realistic and are set too high. And Idaho, one of the few states to actually offer water flows on a trial basis, has not been given credit for working with the federal agencies on salmon recovery. Instead, federal agencies have studied taking up to one-million acre feet of additional water from Idaho storage reservoirs for flows downstream, adding more distrust to their relationship with the state and causing much worry and consternation among water users about their important water supplies.

The recovery methods not currently being promoted by scientists or environmental groups but with much promise in helping these magnificent fish to survive include improved predator management, improved fish passage hardware, and more study of ocean conditions and harvest as possible detrimental effects to the salmon populations in jeopardy. Also, hatchery operations have been and should continue to be improved to focus on recovering localized populations of salmon. Rearing "wild" salmon in hatcheries and nurturing stream-specific stocks continues to show much promise in recovering salmon populations in already healthy ranges of habitat.

In conclusion, we believe the focus has been on recovery measures that will not or cannot be accomplished, and that more focus should be placed on measures that can and should be improved to help recover these fish. Our concurrence with the Committee of Nine and the Idaho Water Users Association comments is consistent with this analysis and we hope that the Corps FR/EIS will produce a much clearer vision of practical and effective salmon recovery for the fish and the people of the Pacific Northwest.

Sincerely,



Mark Limbaugh, Executive Director

Cc: PRWUA Board of Directors
Idaho Water Users Association
Committee of Nine



Lower Snake River Juvenile Salmon Migration Draft Feasibility Report/ Environmental Impact Statement

The U.S. Army Corps of Engineers invites any person who has an interest in the Draft FR/EIS or represents a group of people that have an interest in the subject matter of this study, to make comments. The Corps will respond to the comments related to their Draft FR/EIS in their next NEPA document produced for the Lower Snake River Juvenile Salmon Migration Feasibility Report/EIS. Comments will be accepted through March 31, 2000.

Please see the attached pages for comments by the Payette River Water Users Association.

Respectfully submitted by,

A handwritten signature in black ink, appearing to read "Mark Limbaugh". The signature is written over a horizontal line.

Mark Limbaugh
Executive Director
Payette River Water Users Assoc.
102 N. Main
Payette, ID 83661

Via mail

Cc: Board of Directors
Idaho Water Users Assoc.
Committee of Nine
Dave Shaw, ERO