

**Columbia-Snake River Irrigators Association  
Eastern Oregon Irrigators Association**

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**Summary-Preliminary Comments On:  
Corps Snake River Drawdown EIS  
Federal Agency "All-H" Paper  
John Day Dam Breaching Study-Phase I  
NPPC Framework Review**

**Regional Policy Implications For Salmon Recovery:**

- 1 | • The federal agencies' ten-year focus on river drawdowns and dam breaching has seriously impaired their credibility and misdirected tens-of-millions of dollars that could have been used for "real" salmon recovery actions and projects. The agencies have failed to make an environmental or economic case for the benefits of dam breaching, much less a case for repeating the "dam" studies. The drawdown/breach issue has been the single greatest impediment to implementing regional salmon recovery measures.
- 2 | • During the past ten years, the Corps and NMFS have held more than a dozen public meetings in the Columbia Basin region but have not listened to the dominant message: a large majority of the those directly or indirectly affected by the action--including elected officials from the region--do not support dam breaching. The agencies' focus displays poor judgment and no accountability.
- 3 | • The Northwest Congressional delegation should remove from all federal agency budgets any funding that allows for further review or study of river drawdown or dam breaching measures. Congressional leadership should cut the funding.

**Corps Snake River EIS Preferred Alternative and Comments:**

- The Corps should recommend a preferred alternative for the Final EIS that: 1) eliminates any further review of river drawdown or dam breaching proposals; 2) provides for the continued improvement to dam passage measures, including bypass facilities, turbine upgrades, and fish transport improvements and evaluations; and 3) directs the Corps to prepare a full review of the benefits and costs surrounding the NMFS flow augmentation program within the Snake-Columbia River system--including a review of the potential benefits and costs of the proposed New Water Management Alternative.
- The Corps' review of the PATH and CRI analyses indicate that drawdown/breaching actions would only be more effective than non-breaching

actions if: 1) in-river survival levels are low; 2) transport to in-river (TIR) survival ratios are low; 3) differential delayed transport mortality is high (a low "D Value"); and 4) overall "latent" fish mortality can be attributed to hydro system passage, as opposed to general ocean conditions (ecological factors).

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- But the empirical data collected and reviewed by NMFS-UW indicate that: 1) in-river survival conditions are high (>60% survival); 2) the TIR ratios are high (1.5-3.0); 3) the differential delayed transport mortality is low or depends on which river systems are selected for comparison; and 4) ocean conditions are clearly responsible for the overall "latent mortality" that has affected fish survival, not system passage conditions. The available data and analyses for these variables indicate that dam breaching would not improve Snake River spring migrant runs.
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- Within the Corps EIS, a careful review of the PATH and CRI modeling work--and a review of their critical assumptions and variables--would suggest that dam breaching will not improve snake river spring and summer chinook survival (or the improvement would be very small). The critical assumptions used within the model analyses can vary greatly depending on the data used--but best available data and analyses would suggest that the dam breaching and existing-improved passage conditions alternatives are approximately equivalent in fish benefits.
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- Fall chinook improvements for dam breaching largely depend on the assumptions used to characterize the addition of new spawning habitat within the Lower Snake River Reach--not changes to survival above Lower Granite Dam that would occur within Idaho waters. Any changes to fall chinook survival above Lower Granite Dam would be modest, at best. Fall chinook analyses concerning spawning habitat and fish production in the Lower River are speculative.
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- The effects of ocean conditions on salmon survival and recovery within the Corps' EIS review--as expressed within the PATH and CRI analyses--do not appear to be adequately taken into account. Large magnitude changes to fish production within the Columbia River Basin system will be the result of changes to ocean conditions--all other factors are marginal in comparison.
  - The Corps' economic analyses for the irrigation, navigation, and recreation sectors should be revisited. It appears that the Corps has underestimated the costs within these sectors to varying degrees. The annual direct net costs should be about \$300 million rather than \$250 million. What this means is that the breaching alternative would provide very few fish benefits (limited to small numbers of fall chinook outside of Idaho), but cost the region \$300 million per year.

**John Day Dam Breaching Study:**

- The Corps' should not proceed with any additional review of river drawdown or dam breaching alternatives. As the Corps recommends within its John Day Dam

review, no further study (Phase II analysis) should be conducted on a John Day Pool drawdown. The Congressional delegation should remove from proposed agency budgets any funding that would directly or indirectly support drawdown-breaching studies or proposed measures.

- The fish benefits derived from breaching the John Day Dam appear to be highly speculative and represent a mix of trade-offs among different fish stocks. Also, it appears that the John Day analysis tends to underestimate the benefits of transportation and overestimate potential benefits to fish from drawdown measures. In contrast, the economic costs are definitive and high--about \$700 million annually. This is a very high cost, low benefit salmon recovery measure.

#### The Federal Agencies "All-H" Review:

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- For regional salmon recovery, the federal agencies should direct their efforts toward 4 key actions: 1) improving existing project bypass and fish transportation systems; 2) restructuring the existing NMFS flow augmentation program; 3) improving water management within the region via the New Water Management Alternative; and 4) giving priority to "targeted" salmon recovery measures that will protect tribal fishing rights, such as improving Zone 6 fishing for the tribes.
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- The federal agencies "All-H" review does not deal adequately with water management or the NMFS flow augmentation program. Under water management, the federal agencies should adopt the key features of the New Water Management Alternative, calling for: 1) a restructured flow augmentation program; 2) transferring the economic value of the flow augmentation to water projects in the tributaries and watersheds; and 3) improving water transfers/changes and marketing; 4) implementing stakeholder identified water efficiency projects; and 5) involving the tribes in water management projects as equity partners (see attachment).

#### NPPC Frame Process Results--Fish and Wildlife Program:

- The NPPC framework process results are in early stages of presentation and review. As such, the critical assumptions used by the staff to assess fish benefits and impacts across the 6 alternatives and within the "strawman" analysis need to be transparent. It appears that very conservative assumptions are being made concerning the benefits to fish from transportation and fish passage improvements (PATH Analysis assumptions?); with higher benefit assumptions in place for flow augmentation and dam removal actions.
- The NPPC should focus on water management needs and adopt the key features of the New Water Management Alternative within the new Fish and Wildlife Program (see attachment, New Water Management Alternative).

## A New Water Management Alternative for the Columbia River Basin

*Water Management Will Be the Key to Future Resource Planning*

### Flow Augmentation Program:

- The existing flow augmentation program is restructured based on biological data and economic impacts. The goal is *optimization*.
- The spring period flow augmentation regime is eliminated. The summer regime is limited to levels that approximate the summer period flow regime that was provided during 1994, a low water-year condition.
- The impacts to Idaho from summer flow augmentation are limited; Upper Snake River Basin withdrawals would be less than under the NMFS 1995 BIOP; impacts to the Upper Columbia Basin (Montana) would be limited.
- Changes to the existing flow augmentation program will create "new" revenues from the hydro power system—presently foregone revenues incurred by BPA.

### New Water Resources Projects for Watersheds and Tributaries:

- Move water management for environmental needs off the mainstem system and into the watersheds and tributaries, to provide measurable results and real benefits.
- Revenues (funding) provided by restructuring the flow augmentation program are used to develop new water resources projects in watersheds and the mainstem tributaries.
  - New Water Storage Projects and Applications.
  - Promotion of Water Transfers/Changes with Local Control.
  - Implementation of Selected Efficiency Measures.

### Tribal Rights and Economic Development:

- Tribal fishing rights are recognized and respected as legitimate *property rights*; recovery measures are implemented that improve or complement tribal rights.
- The tribes are invited to participate in the develop of new water resources projects as *equity partners*. Funding resources gained from the restructured flow augmentation program are used for this purpose.

### State and Private Water Rights, Economic Development:

- State control over water rights and management is retained; private water rights are protected. Community social and economic needs are met through continued access to adequate water resources.