



**MADISON
FARMS**

March 28, 2000

Department of the Army
Walla Walla District Corps of Engineers
Attention: Lower Snake River Study
201 North Third Avenue
Walla Walla, Washington 99362-1876

Ladies and Gentlemen:

I am writing to express my strong opposition to the dam breaching proposal in the Corps of Engineers' Lower Snake Draft Environmental Impact Statement (EIS). Simply put, breaching is too expensive, the benefits are too uncertain, and there are other non-breaching options that exist which can do equally well, if not better, than the breaching options at saving fish.

Madison Farms is a 3rd generation family farm, established in 1914 in Echo, Oregon. Farming techniques include minimum tillage, no-till, laser-guided land leveling, GPS controlled field monitoring, and neutron probe soil moisture monitoring. We have 5 miles of streambeds protected by riparian fencing. Ditches, fencerows, and field perimeters have been planted to grass for wildlife habitat. We receive and apply Bio-Solids from the Portland metro area to stabilize sensitive rangeland areas. We also land apply nutrient rich reuse water from a local food processor at agronomic rates for organic fertilizer benefits. We farm 6600 acres of land with irrigation water received from the Columbia River.

The draft EIS has a number of shortcomings that need to be addressed. They include:

- No accounting for impacts on rates with the loss of barge competition; anyone can tell you that rail and truck rates will rise without the presence of barge transportation.
- The cost estimate of moving from barge to rail or truck is suspiciously low.
- The Corps assumes that storage and transport infrastructure can be added without short term costs.
- No allowance for property value losses due to "recapitalization" of farm land at lower values. The Corps assumes that all the land will remain in production, but may change hands through bankruptcies and re-enter production at a lower value.
- The use of questionable "passive use" or "existence" values in the analysis, and applying them only on the pro-breaching scenario. The entire section on passive use should be removed.
- Dependence on a large influx of visitors from California to bolster the overly optimistic recreation benefit estimates, and not accounting for recreation values lost through breaching.
- Impacts on air quality from using power sources other than hydropower, and transportation modes other than barges. All of the alternatives have negative air quality impacts.
- The Corps also overlooked a number of impacts, including the possibility of

losing some of the service by ocean freight lines to the Port of Portland.

Comments provided to you earlier by the Oregon Wheat Growers League more clearly define these problems.

Nearly every resident of the region, myself included, wants to save salmon runs. They are an important part of the environment, history, economy and culture of the region. Farming also fits those descriptions. There is no need to sacrifice one for the other; there is no regional consensus in favor of breaching dams.

Sincerely yours,



Kent Madison
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