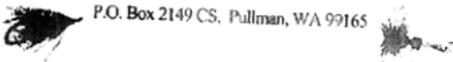


MAR 30 2000

Clearwater FlyCasters



P.O. Box 2149 CS, Pullman, WA 99165

Dear Sirs,

The Clearwater Flycasters is a local fly fishing club (duly incorporated, affiliate organization of the Federation of Fly Fishers) located in eastern Washington with over 100 members. Our membership encompasses a variety of individuals from all walks of life living in the Pullman/Moscow area, the Lewiston/Clarkston Valley and as far north as Spokane, Washington. Thank you for allowing us to comment on this important issue.

The Clearwater Flycasters has traditionally opposed the dams on the lower Snake River. In the very first issue of our club newsletter, dated July 1970, the founding members of the Clearwater Flycasters unanimously voted to support the Northwest Steelheaders Association in their fight against dams in the principal rivers of the Northwest. When the dams went in and runs began to suffer, the club responded by supporting the Corps' barging efforts - but they have proven ineffective in maintaining or restoring Snake River runs of salmon and steelhead. We believe that the time has come to take bold measures and remove the earthen portion of the four lower Snake River dams. The loss of the salmon and steelhead, and the intrinsic value they represent, is something that we feel is not adequately addressed in the Corps' Draft Feasibility Report and Environmental Impact Statement.

1 The Lower Snake River Juvenile Salmon Feasibility Report/ Environmental Impact Statement fails to present and consider adequately the intrinsic value that people place on the continued existence of the runs of wild salmon and steelhead. Having wild steelhead and salmon in the Snake River has value to many people beyond the amount associated with recreation, tourism, and direct uses of the fishery. Many people want to have the fish in the river whether they are using them or not. Qualitatively we know that this is so from the testimony at NEPA hearings, letters to newspapers, and other public and private expressions of concern for fish survival. There is no mention in the Summary Report of the EIS of this important benefit to preserving the fish runs. The Main Report mentions it but does not include it in the tabular comparisons of costs and benefits. The reader must consult Appendix I of the EIS in order to see a full explanation. It is a dominant effect, \$66 million to \$879 million annual benefit in the case of the breaching alternative (Alternative 4), and it has been effectively ignored in presenting the cost benefit analysis in the EIS.

The Drawdown Regional Economic Workgroup (DREW) recognized that this existence value, or passive use value, should have been part of the economic analysis in

2 the EIS and requested that a contingent valuation survey be conducted to measure its magnitude. Although a survey instrument was designed and pre-tested, the survey itself was not conducted because of controversy surrounding the pretest mailing and the contingent valuation methodology. This work should have been done and should have focused on the likelihood that action under each alternative would avoid extinction. Under the circumstances, the economists doing the work adapted four existing passive use value studies to the Snake River situation to derive the annual benefit range above, \$66 million to \$879 million with a middle range between \$142 million and \$508 million for the breaching alternative. Alternatives 2 and 3 did not show much passive use benefit. However, 1999 revisions to their effectiveness, not considered in Appendix 1, would have brought them closer to the Alternative 4 value. The economic analysis in Appendix 1 pointed out that the values above are probably underestimates because the surveys used in the four existing studies did not refer to threatened or endangered species. Even better than a contingent valuation survey would have been a referendum on alternatives 2, 3, and 4, or at least on breaching (Alternative 4). Here the voters would be able to express directly whether they are willing to accept the costs of each alternative, especially breaching, in return for its benefits including the prospects that the alternative would prevent extinction of the runs. This latter action did not take place and presumably will not take place. However, the fact that many people place a high intrinsic value on the preservation of the wild stocks of salmon and steelhead is demonstrated by the EIS, and must be realized and taken into account in the Record of Decision for the action to be taken. It is clear that this benefit is large and widespread and favors the alternative with the maximum likelihood to preserve the wild runs, namely the breaching alternative.

3 The DREW further made an estimate of the passive value of restoring the Free flowing nature of the lower Snake River even apart from the question of preserving the fish runs. In this case they are measuring the value that people place on having a free flowing river even if they do not visit or use it themselves. DREW again used results from existing studies. The resulting annual benefit from this work is \$420 million. It is again a large effect and clearly associated only with Alternative 4.

Because we feel that the intrinsic value of salmon, steelhead and a free flowing river are important and that the loss of such cultural values is unacceptable we support Alternative 4, breaching the dams, to achieve salmon recovery.

We realize that the removal of the earth-filled portion of the dams is not a cure-all. We believe that habitat restoration, harvest modifications (yes, even elimination of sport fishing if necessary), and decreasing the reliance on hatchery supplementation must be part of the overall solution to recovering the runs of salmon and steelhead in the Snake River Basin.

We do, as a club, unanimously support alternative 4 that calls for the removal of the earth-filled portion of the lower four Snake River dams and the elimination of slack water thereby opening up over 140 miles of free flowing river. Doing so will restore 140 miles of chinook spawning habitat and reduce smolt mortality from predators, lethal

water temperatures, excessive migration times and turbine passage imposed by Lower Granite, Little Goose, Lower Monumental and Ice Harbor dams.

Respectfully submitted,



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March 27, 2000

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TO: Department of the Army
Walla Walla District Corps of Engineers
ATTN: Lower Snake River Study