



WASHINGTON STATE POTATO COMMISSION  
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March 28, 2000

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

**Re: Lower Snake River Juvenile Salmon Migration Feasibility Study/Draft Environmental Impact Statement Comments**

Dear Sir or Madam:

Thank you for the opportunity to comment on the Lower Snake River Juvenile Salmon Migration Feasibility Study/Draft Environmental Impact Statement (FS/DEIS) 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 proposals such as 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 these proposals.

The recently released studies and series of public meetings were designed to talk about how to save fish. Even the information distributed by the Federal Caucus indicated that the options and alternatives in the various studies were being presented to stimulate public discussion of what the region can do to recover salmon, 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. 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. As a region, we should not be supporting radical actions or "silver bullets" that have the ability to devastate our economy and won't save fish.

### Guiding Principles

We support a comprehensive recovery plan that has a clear vision, achievable and realistic goals and accountability. The plan must be based on sound, credible science and common sense.

A comprehensive recovery plan is essential if we expect good public policy, good decisions and good results. Relying on science alone won't assure the right solution or decisions. Focusing on only parts of the problem won't get us good decisions or results either. We need to get serious about obtaining good, credible science, examining the consequences of our proposals and testing the common sense factor before making decisions that affect the environment in which we live and on which we depend for our livelihood. We do not want to make mistakes that are costly to our economy and our natural resources.

Breaching the four lower Snake River hydroelectric dams will not solve our problem. Breaching dams is not a recovery plan. In fact, fish survival through the hydropower system has improved to the point where the National Marine Fisheries Service (NMFS) has found that breaching alone, or increases in flow or spill regimes alone, cannot bring these fish populations back. We oppose options that rely on dam breaching or other unproven actions and ignore the many benefits of our hydropower system.

### FS/DEIS

1 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. Even this study was commissioned at a time when the only Endangered Species Act (ESA) listings were for species found in the lower Snake River region. Today, the situation is much different. The U.S. Fish and Wildlife Service lists 608 fish and non-fish species in the region that are under ESA protection. And, 26 West Coast runs of salmon and steelhead are listed with another 8 either candidates or proposed for listing. Of these 34 runs, only 4 pass the hydroelectric dams on the lower Snake River. The problem goes way beyond what was addressed in the FS/DEIS.

The region has learned much in the past 20 years. We seem to be flooded with data that is causing confusion and huge differences of opinion. Yet, we are proposing to spend an estimated \$1 billion dollars on experiments such as dam breaching while

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cont. | unknown impacts on fish survival that NMFS identifies as unknown effects of climate and conditions in the estuary and ocean have yet to be addressed.

2 | We are also proposing to spend this money based on contentious, incomplete science gathered through studies such as the Plan for Analyzing and Testing Hypotheses (PATH). Even biologists are concerned with the PATH study results. The study incorporates direct mortality effects from passage through the hydropower system and indirect (delayed) mortality assumed to occur as a result of passage through the hydropower system and/or transportation system. Unexplained or extra mortality factors add even more uncertainty and unknowns. According to information published by the Federal Caucus, new technology and experiments, and large-scale databases should allow scientists to answer the uncertainties about extra mortality in the next 10 to 20 years. Spending approximately \$1 billion dollars on an experiment that the region has been told doesn't and won't have the science to back it up for another 10 to 20 years is ludicrous. It is obvious there is still a great deal that is not understood about survival through the river system and until we understand more, we cannot and should not condone these radical, unproven and extremely costly proposals.

3 | Since transportation would affect the agricultural community, let me use it as one example. The Drawdown Regional Economic Workgroup (DREW) navigation subgroup contracted with the Upper Great Plains Transportation Institute to evaluate rate impacts and the report concluded that there would be essentially no rate impacts, despite clear evidence in their own data tables to the contrary. Transportation rates, and consequently the cost of production, will most certainly be increased. Rail is twice as expensive as barge transportation and truck transportation is 3—4 times barge rates. Prices for our commodities are determined in a competitive world market and an attempt to pass costs along through higher prices will only drive business to other suppliers. Growers bear the cost of production, which includes transportation and marketing cost increases.

4 | Electricity is another cost of production. The Federal Caucus Citizen Update Issue 3 indicated that electricity rates throughout the region would increase between 1.9 percent and 6.7 percent. While this doesn't seem drastic to a residential consumer or those outside the region, 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 where power rates are more affordable and where they can remain competitive. In addition, the instability of power supply and rates that would result from breaching the lower Snake River hydroelectric dams would provide a climate of uncertainty to businesses, farms and food processors in the Columbia Basin of Washington and Oregon.

5 | Regional power needs are an issue that has not been addressed. In March 2000 the Northwest Power Planning Council issued a report entitled Northwest Power Supply Adequacy/Reliability Study. The report states that there is a 24% probability of generation shortfall by the year 2003, compared to an inferred utility standard of 5%. To

meet that standard in the Northwest, 3,000 megawatts of new generation would need to be added. The 4 hydroelectric dams on the lower Snake River produce 1,195 megawatts of power for the region. Removing these dams complicates the generation shortfall, adds to the uncertainty of electricity availability and cost, and is not the answer.

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These studies fail to recognize the many contributions the hydropower system has already made to salmon recovery. Hydropower generators have been leaders in developing new technology to improve fish passage at their facilities. 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. U.S. Army Corps of Engineers' representatives reiterated these facts at a recent hearing before the House Energy and Water Appropriations Subcommittee.

In addition, 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. These are at risk with the proposed dam breaching scenario because the U.S. Army Corps of Engineers estimates that 50-75 million cubic yards of sediment will be released into the river when the dams are breached. The sediment will pass through the Hanford Reach, the spawning ground for the healthiest fall chinook stock in the system.

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Furthermore, recent studies indicate that 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.

The number of salmon returning to the Snake River indicates that fish runs may be improving. This could be as a result of our actions or quite possibly a combination of our actions and an improvement in ocean conditions. More than 4,000 spring/summer jack salmon were counted at Lower Granite Dam this year – about 10 times more than the 1998 count and 40 times the number counted in 1994. Jack returns of spring/summer chinook at Bonneville Dam this year were the highest (11,684) since biologists began keeping track of them in the 1970s.

Dam breaching is not a silver bullet and just does not come close to returning enough benefit to justify the staggering cost. NMFS research shows that the benefits of dam breaching are minimal, will take many years to realize and even the benefits are speculative. The Anadromous Fish Appendix of the DEIS states:

*"CRI analyses suggest that no single management action is likely to result in sufficiently improved demography for spring/summer chinook salmon. For dam breaching alone to recovery spring/summer chinook salmon, it would have to produce improvements in estuarine and early ocean survival as high as 80 to 100 percent, as well as an approximate 30 percent improvement in survival during upstream migration."*

7 It is obvious that our problem is much broader than the current debate over breaching hydroelectric dams on the Snake River. The Anadromous Fish Appendix indicates that the most effective way to help Snake River stocks is to aggressively pursue actions that improve survival in the first year of life and during their time in the estuary and entry into the ocean.

*"On a more optimistic note, the CRI analyses suggest that a combination of improvements spread throughout the life cycle, and attained by a mixture of different management actions, could promote adequate annual population growth for spring/summer chinook salmon. Numerical experiments that correspond to manipulations of "current demography" indicate that small improvements in estuarine and early ocean survival or in the survival of newly born fish, will yield the greatest rewards in terms of enhanced population growth."*

8 Bottom line is we need to consider the significant improvements the hydropower system has already made and consider the changing ocean conditions and other factors affecting our salmon resource. It's obvious that this problem won't be solved with breaching dams. We need a comprehensive recovery plan that addresses all factors in the salmon life cycle. Until we have more to stand on than theory and contentious science, we cannot in good faith support any of the options that include dam breaching or massive flow augmentation.

### A Promising Alternative

9 The All-H Paper begins to define a comprehensive recovery plan. We applaud the Federal Caucus for this effort. 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 – in this case hydropower – will not solve the problem and will be a careless, expensive and wasteful experiment that won't get results. The Federal Caucus 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 Hs 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. Once the region has set goals and objectives, gathered 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.

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cont. 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 Hs, with the exception of hydropower. The hydropower options continue to focus exclusively on dam breaching and flow augmentation. The options for hydropower appear radical in comparison to alternatives for the other Hs 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.

If we continue to focus on breaching the 4 lower Snake River dams without recognizing improvements already made to the system, the complexity of the problem 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 cannot be successful because there is not a single source of mortality.

### **The Public Process**

10 I'd like to comment on the recent public hearing process. While I believe the process was put in place with the best of intentions, the outcome may have done more harm than good. 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 and return our rivers to free flowing. 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.

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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. It disturbs me to read articles that quote a high-ranking official of your organization as saying that, indeed, the numbers may be the deciding factor in this debate. After all the promises, it appears as though it has become 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.

Let me assure you, 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 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.

## **Conclusion**

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. Our region is in the midst of an invaluable process to define a long-term recovery plan for listed species. This recovery plan is long overdue and badly needed. Without a recovery plan that addresses all the causes of mortality, the region continues to focus on the hydropower system. While there has been a significant increase in survival for listed stocks as they are migrating past the dams, there are many sources of mortality outside of the hydropower system that need to be addressed.

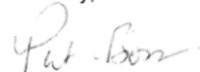
I urge you to discard the risky, expensive experiments like dam breaching, massive flow augmentation and costly capital improvements – those outlined in Alternatives 3 and 4. Instead take the accomplishments the hydropower system has seen with transportation of juvenile fish, turbine upgrades and fish bypass systems to the table as part of a comprehensive recovery plan. I urge you to help 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. We need to seriously consider the consequences of radical and risky "fixes," that could devastate our economy or harm our environment.

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

c: 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  
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