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American Falls Reservoir District No. 2
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MAR 23 2000

Comments on Corps DEIS & the All-H paper

March 8, 2000

My name is Lynn Harmon, I am manager for the Big Wood Canal Company and American Falls Reservoir District No. 2, located in Shoshone, Idaho. Our organization is responsible for delivery of irrigation water to 98,000 acres in Blaine, Lincoln, Jerome and Gooding counties. As a representative of the 1000 water users who we provide irrigation water to I would like to express my concerns with the various salmon studies and offer a few suggestions.

First I would like to go on record as being firmly opposed to Flow Augmentation and Dam removal.

Idaho has supplied more than 10 million acre feet of water for flow augmentation in the past 5 years and it has resulted in no measurable benefit to salmon. Yet every study but one requires from 1 to 3 million acre feet of Idaho water for flow augmentation.

It has been suggested that more flow would help Salmon recovery. However, taking an additional 1 million acre feet of irrigation water for flow augmentation would dry up more than 600,000 acres of productive farm land at an annual cost of \$430 million and thousands of agricultural jobs. The impact to the economy from this type of a decision would be devastating. It would undoubtedly cause many of the communities in southern Idaho to cease to exist as no jobs to support them would exist. Agriculture is the economic back bone of this area.

1 Taking this 1 million acre feet of Idaho water means that many of Idaho's reservoirs would be empty up to 10% of the time on a dry year. Is it reasonable to devastate our resident fisheries, wildlife habitat and recreational opportunities for a option like dam breaching.

The net direct value to the economy of one acre foot of water, when used for irrigation, is \$40 to \$70 per acre foot. The 1994 flow augmentation program used 11 million acre feet. Water used for flow augmentation is not available for irrigation use or power production. Is it reasonable to continue to use water for flow augmentation when there is no scientific proof that it helps salmon recovery?

Barging of smolts is working. Recent studies by the National Marine Fisheries Service indicate that 98% of barged fish and 58 % of in-river fish reach the Pacific alive. Of those, twice as many barged fish return to spawning areas. Today, National Marine Fisheries Service says that survival of smolt is as high as it was in the 1960's and 1970's before the dams were built. In that case, tearing out dams will not provide any greater chance of survival.

Using current data, the difference between breaching and not breaching is as little as 2% over 48 to 100 years.

Dam breaching is a very costly measure which would take years to accomplish. No real data as to what effect the release of the 75 million tons of sediment which has built up behind these dams would have on the resident fish population in the river has been released. Estimates are that it would require up to 16 years to remove the sections of the four dams on the lower Snake River. It is likely, that the Salmon don't have that much time according to recent studies. Wouldn't it be more reasonable to work with other options which would show more immediate effects on increasing salmon populations.

The amount of power generated by the four dams is not as insignificant as some would have you believe. Their combined generating capacity is greater than that of Idaho Power Co. Making up that deficit would require massive thermal generating facilities, which increase costs and air pollution problems. The other alternative would be nuclear and no one want the risks associated with nuclear power.

The draft EIS depends on results from the PATH computer program to justify destroying four lower Snake River Dams. PATH models all include flow augmentation from Idaho. Is it reasonable to base our actions on a computer model that shows results that do not match real data as the basis for breaching four lower Snake River Dams?

Some Things We Can Do

Fish passage improvements for juvenile and adult salmon, such as turbine modifications, fish screens, spillway modifications, fish ladder improvements and by-pass improvements.

Work to improve natural habitat on the river and tributaries.

Change the hatchery practices so they more closely mimic natural conditions that exist.

Dedicate more money to research Ocean conditions and estuary conditions

Work on programs to relocate terns and cormorants so that they prey on fewer salmon smolts.

Develop partnerships with local people in programs such as the hatch box program currently being pursued by the Nez Perce and Sho-Ban tribes and Lemhi county. This provides more smolts going downstream and results in more returning adults.

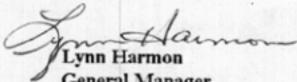
Reduce ocean harvest to help insure more adult salmon returns.

In conclusion, breaching dams is the most drastic option available. It can not happen in time to save endangered salmon runs. Removing an additional 1 to 2 million acre feet of water from Idaho, drying up 600,000 acres of productive farm

land, as well as, eliminating thousands of agricultural jobs and devastating the regional economy is unacceptable. We must look at reasonable alternatives that help recover salmon quickly. We must not continue to waste time and money on pursuing options which cannot happen in time to save salmon runs. Why not use the money being spent on fighting over what to do, to improve existing efforts and options which actually help salmon recovery. Dam breaching is not the silver bullet for salmon recovery, nor is flow augmentation above what currently exists. There is no silver bullet for salmon recovery.

I would like to thank you for the opportunity to be able to voice my concerns and hope that you arrive at a decision which will benefit both salmon and agriculture.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn Harmon".

Lynn Harmon

General Manager

Big Wood Canal Company

American Falls Reservoir District No. 2