MAR 22 2000

Washington Wheat

February 23, 2000

Federal Caucus Comment Record
c/o BPA-PL
707 West Main St. Suite 500
Spokane, WA 99201

Dear Sirs,

The following comments from the Washington Wheat Commission (WWC) and the Washington Association of Wheat Growers (WAWG), address the Corps of Engineers Draft Lower Snake River Juvenile Salmon Migration Feasibility Report (Draft Report), the Federal All-H Paper and the John Day Drawdown Study.

The Corps study was not a dam breaching study. The purpose of the study was to find the best solution to improve juvenile salmon survival. It is disappointing that the Corps spent so much time and money on a study only to announce it was unable to make a conclusive statement, and will now ask the public what should be done about the dams. At the same time, National Marine Fisheries Service (NMFS) will determine in May the actions to take for salmon using the Corps study, a study the Corps says will not be finalized until Fall. This does not make sense.

With regards to the Draft Report, we recognize that much is being accomplished under Alternative 1 and support the continued improvements to the system that are proving to be very effective in enhancing juvenile and adult fish migration.

We support Alternative 2 that provides for the maximum transport of juvenile salmon. Barging works, as was well documented in the report. For example, on page 5.4-13 of the Draft Report, it states that while in river passage survival ranges from 45 to 62 percent for spring/summer Chinook and 42 to 54 percent for steelhead. If they are collected and transported at the first dam, their system survival is about 98 percent. Again on page 5.4-13 the report states that "if it is assumed that delayed mortality due to transport is not significant (as indicated by NMFS), overall transport survival is 79 to 98 percent, which is considered higher than the 61 percent in-river survival."

We support Alternative 3, providing major system improvements. Behavioral guidance structures, collection and by-pass systems show great promise for passing smolts through dams at a minimum level of harm. By-pass system modifications are based on the tested and proven model of the Wells Dam on the Mid-Columbia, operated by Douglas County PUD. The Wells Dam was recently granted an HCP with smolt survival ratios measuring approximately 95%, approaching natural run of river mortality levels.

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We oppose Alternative 4, breaching dams. Developing PIT tag data has proven the limited capacity of "PATH" as a scientific tool for characterizing the dynamic life cycle of anadromous species. In contrast, CRI (cumulative risk initiative) analysis is progressively discounting the assumed adverse impact of the Snake River dams on salmon survival. CRI analysis even suggests that "dam passage improvements and fish transport measures implemented since the late 1970's have likely prevented the extinction of spring/ summer Chinook and possibly others" (Draft Report Summary, p.18).

NMFS's own evaluation reveals the benefits of dam removal are based upon poor data by stating "debate about the importance of post Bonneville effects of dams has been highly contentious and data with which to estimate these parameters are generally poor" (Draft Report Summary, p.18).

Dam removal will forego the established benefits the dams provide for salmon recovery. The Draft Report Summary highlights how breaching will also increase water temperatures, increase sediment movement, decrease air quality, decrease land values, eliminate food production on thousands of acres, increase electric rates, create havoc with the infrastructure and have a net negative effect on jobs and incomes. All while the benefits to salmon are based on poor science.

1 We note that the true increased cost of transporting grain established in the study is underestimated. Grain does not move evenly every month as assumed in the model.
2 Grain movement is dynamic and moves according to market demand. The barge system is uniquely able to quickly adjust and accommodate such demand changes.

3 Likewise, the study concludes that the system does not currently operate at a least-cost level. This is due in large part from the inability of shippers to obtain rail cars and the lack of rail service. We are not so naïve as to believe the rail industry will suddenly improve service and car availability when modal competition is reduced by dam breaching. The costs are also underestimated because of the failure to include the rates paid by growers to ship grain.

At the core, basing the study on perfect competition when one mode of transport is actually eliminated by breaching (thereby reducing competition) and then assuming rates will not increase is not reality. It does not reflect the environment that growers face in moving product to market. Rates and costs will indeed increase when competition is reduced and they will continue to increase over the next one hundred years.

4 Even with the assumptions, it is unclear why the Draft Report shows on 5.8-2 an average 27 cent per bushel increase, while the Draft Report Summary (page 31) lowers the figure to 19 cents per bushel.

We suggest that NMFS and other decision-makers understand fully the infrastructure costs identified by the Corps that, according to the study, will occur outside the National

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Economic Development (NED) analysis. Such costs are identified as rail line upgrades, highway improvements, elevator capacity and improvements, railcars, and car storage and range as high as $531 million. The Corps correctly states that these costs and improvements "would be required prior to actual implementation of the drawdown in order to increase the capacity of the system" (Appendix I, p. I3-80).

5 These added costs would indeed be a direct result of dam breaching. It is inappropriate to exclude the annual cost of infrastructure improvements in the transportation costs with breaching as is done in the study (Appendix I, p. 13-80). By so doing, the transportation cost component of the study is understated.

We appreciate NMFS beginning to address all H's applicable to salmon. It is ironic however, that it appears NMFS has not included the ocean, wherein salmon spend most of their existence. The Corps, in its report, identifies numerous studies indicating the ocean effect is very significant with ocean temperature and nutrient changes highly correlated with salmon productivity and survival, even to the point of overriding any improvement made in the hydrosystem. We encourage NMFS to reveal and explain to the public how and to what extent ocean conditions are accounted for in proposed recovery actions.

6 In terms of harvest, the Federal Caucus goals of conserving species and providing sustainable harvest appear to be in conflict. It is only logical that a fish not killed by harvest is in fact a potential spawning adult. Fish harvest managed for endangered species escapement to spawning grounds only makes sense. We seriously question why salmon are the only endangered species being allowed to be killed, wherein harvest levels are set by NMFS, the agency charged with their recovery under the ESA. At the same time, federal laws protect predators that consume millions of smolts each year and many predators species introduced by fishery agencies themselves over time are taking a huge toll on salmon. Predator control must be a key part of a recovery plan.

7 Regarding hatcheries, the distinction between hatchery salmon and wild salmon is still fuzzy. A hatchery fish (not under ESA protection and even clubbed to death by some fishery agencies) is apparently genetically inferior, according to fish biologists. Yet, if the hatchery fish mistakenly spawns in the "wild," the offspring are suddenly wild, genetically superior, and subject to the ESA. If there really is a difference, the elimination of mixed stock harvest practices and the adoption of selective practices are essential.

NMFS's approach to the Hydropower section of the All-H Paper is confusing. NMFS says the fish problem is a regional issue, even stating that Upper Columbia stocks are in worse shape than the Snake River stocks. The summary talks about Grand Coulee, the Hells Canyon Complex and other dams on tributaries that have totally blocked spawning areas because of a lack of fish passage. Then NMFS turns around and focuses on breaching the Lower Snake River dams (with passage) as one of the three options to the regional fish problem. Only four of the nearly 30 salmon runs threatened

or endangered migrate back and forth across the Lower Snake River dams. There seems to be tunnel vision regarding dams when it comes to the basin-wide and coast-wide salmon problem.

Many in agriculture have already made significant contributions to habitat improvement and restoration of fresh water habitat. The short list of projects and plans in various stages of completion reads as follows:

1) Asotin Creek project, Asotin County Conservation District
2) Tucannon River watershed restoration
3) Touchet River watershed restoration
4) Walla Walla River restoration plans
5) Douglas County HCP (habitat conservation plan) facilitated by the Foster Creek Conservation District
6) Widespread acceptance of the NRCS Conservation Reserve Enhancement Program and a desire to see the program expanded.
7) TMDL pilot project with the Department of Ecology

We strongly support the development of watershed based incentive programs for landowners and managers. Wheat growers have been proactive in effectively managing and improving habitat and we will continue our efforts.

Before sweeping rules and opinions are issued with regard to habitat, NMFS should come out onto the land and see what wheat growers and many others are doing for the benefit of not only salmon, but also many other fish and wildlife species. As resource managers, we have a great deal of experience to offer through our association with local Conservation Districts, local National Resource Conservation Service (NRCS) personnel and local irrigation districts.

In terms of the John Day pool drawdown, we support the Corps' conclusions that no further study is necessary and note that similar conclusions would apply to the Snake River Dams.

In conclusion, we support the multi-use function of the river system as authorized by Congress, a system that has a great deal to do with the favorable quality of life for people in the Northwest. With credible science and sound policy we can effectively recover salmon without destroying dams and large segments of the Pacific Northwest economy.

Sincerely,

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