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March 16, 2000

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Federal Caucus Comment Record  
c/o BPA-PL  
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MAR 22 2000

RE: All-H Paper "Conservation of Columbia Basin Fish – Building a Conceptual Recovery Plan" Comment

The East Columbia Basin Irrigation District (ECBID) is one of three irrigation districts operating the Bureau of Reclamation's Columbia Basin Project. The East District operates canals serving the Moses Lake, Warden and Othello areas providing irrigation water to over 2400 farms, individuals and other businesses with a total irrigated service area of 152,000 acres. The source of this water is the Columbia River at Grand Coulee Dam.

I am one of 17 Columbia Basin Irrigation Project Directors. 10,000 people live within the irrigation district I represent. All are dependent upon Columbia River water. These are the people that the All-H Paper will affect. The All-H Paper has focused upon comprehensive salmon recovery. There is no reason to believe that comprehensive salmon recovery will achieve any more success than past Columbia and Snake River salmon recovery. Salmon recovery actions must be effective not comprehensive.

Salmon recovery actions must be effective not comprehensive. Elimination of comprehensive ineffective elements of current salmon recovery will lead to successful effective salmon recovery. Numerous elements of the habitat and hydropower sections of the All-H Paper touch on factors pertinent to the East District. The element most affecting the East District is flow augmentation. These comments will therefore focus on flow augmentation and in addition address the breaching of Snake River dams.

Present flow augmentation targets, based largely on the 1995 Biological Opinion, call for up to 16 million acre feet per year of flow augmentation. Most of that water comes from the mainstem of the Columbia but the Snake River portion is also very significant due to the smaller size of that river.

These flow targets exceed the levels that can be successfully shaped by the existing U.S. storage system at the times they are called for. There is mounting evidence that these high levels of flows are not producing the outmigration survival benefit that are intended to produce. In spite of this, the Options and Alternatives presented in the All-H Paper offer choices only for continuing flow augmentation at present levels or for increased levels of

flow augmentation. *The final All-H Paper should include an option to reduce mainstem Columbia flow augmentation to no more than 4 million acre feet per year, including a shift in timing to late summer and fall. That option should also become the preferred alternative.*

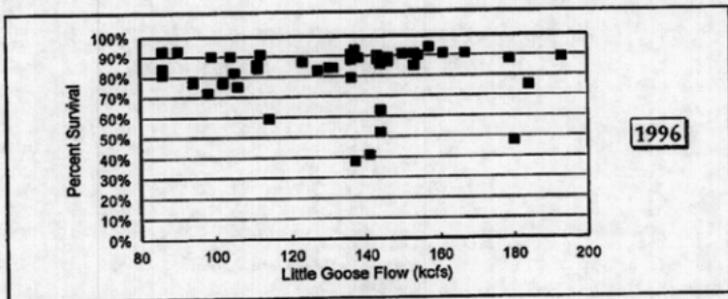
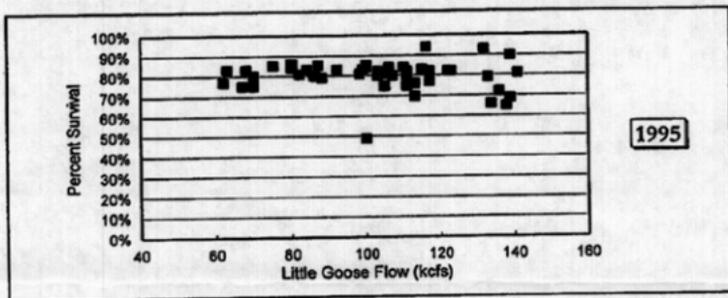
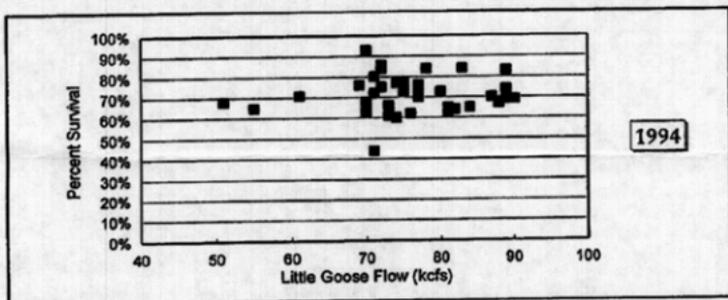
The discussion of the present flow augmentation strategy on pages 6-8 of the Hydropower Appendix includes the following statement:

“Juvenile spring fish survival (estimated from the upper dam on the Snake River to Bonneville Dam) has increased since the 1995 FCRPS Biological Opinion (BO) measures were implemented. However, the benefit conferred by flow cannot be isolated from the effects of other management activities. While no direct flow-survival relationship has been detected within the reaches studied, higher flows might improve conditions in the estuary and survival of migrants in the estuary and plume. In addition, higher flows and reduced exposure to stressors during migration through reservoirs might improve fish condition upon arrival in the estuary.”

Should this 16 maf annual flow augmentation target continue, or be increased, based on “mights”?

Your comment record includes complete copy of a February 1998 report entitled “The Columbia – Snake River Flow Targets/Augmentation Program”. The report was prepared by a study team of reputable biologists and economists. The report generates no additional science but analyzes already existing Federal Caucus data to conclude present flow augmentation targets are excessive and ineffectual. Figure 2, preceding page 13 of that report presents data indicating present flow targets are hydrologically unrealistic. Figure 10 (copied on the next page) following page 20 presents NMFS research confirming there is no outmigration survival benefit provided by the present flow targets. The years presented are 1994 (a dry year), 1995 (an average year) and 1996 (a wet year). Survival is measured across a range of flows for each year. If more water equaled more survival, a mean or median line drawn through the data points would slope upwards from left to right. The slope is flat, confirming the lack of a flow-survival relationship. This figure does point out that survival is better in wetter years than in drier years but shaping mainstem flows to mimic wetter years does not result in wetter year survival conditions for average or dry years. This report concludes and recommends that mainstem Columbia flow augmentation targets should not be higher than 4 maf and that Snake River targets should not be higher than the current 427,000 acre feet target. The report also suggests that these levels of flow augmentation may provide better benefits if used in late summer or fall.

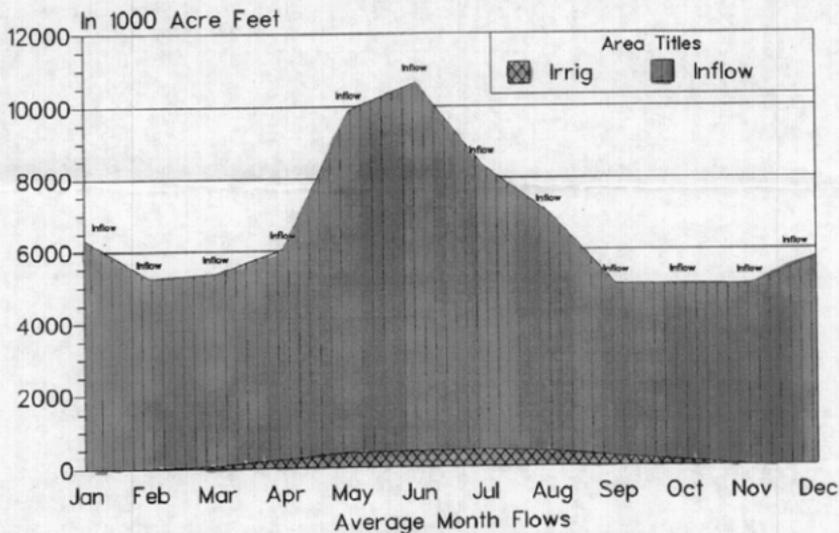
Figure 10. NMFS/UW Survival Data, 1994-1996  
 Survival Rates for Juvenile Spring Chinook Release Groups  
 (L. Granite Tailrace to L. Monumental Tailrace)



Current flow Augmentation effort is enormous in scope. Flow augmentation accounts for about ¼ of the total Columbia and Snake River salmon recovery effort. This flow augmentation effort is without benefit to salmon recovery. The present levels of flow augmentation are causing problems and costs for the East District's service area. These flow targets have caused the Bureau of Reclamation to place an administrative moratorium on the use of 85,000 acre feet of previously authorized Columbia Basin Project water which has eliminated the option for the use of additional surface water for agricultural, municipal or industrial purposes in the District's service area. This same area is also experiencing a shortage of groundwater, the current source for most industrial and municipal uses and a significant portion of agricultural use. The present flow augmentation targets are constraining most opportunities for agricultural, industrial and municipal growth in this area. Such a constraint is not appropriate in view of the lack of an overwhelmingly apparent flow-survival relationship.

Irrigation withdrawals on the Columbia River are insignificant. Please note the attached chart titled "Columbia River Inflow at Grand Coulee Dam with Columbia Basin Irrigation Withdrawal at Banks Lake."

Columbia River Inflow at Grand Coulee Dam  
with  
Columbia Basin Irrigation Withdrawal at Banks Lake



This chart uses average data from the Bureau of Reclamation. This chart shows that more than 97% of the Columbia River water at Grand Coulee Dam remains in the River. Consider the proven facts that there is no flow/survival relationship for juvenile salmon, and the insignificant portion of Columbia River water used for irrigation (about 2.7 million-acre feet). Why then is there a moratorium on Columbia River water withdrawals in each of the following areas? The moratorium prevents proper mixing of land applied spray field water. The moratorium prevents necessary irrigation. The moratorium prevents city and county citizens from increasing water use that is needed for residences, schools and hospitals.

The moratorium is unnecessary for salmon recovery and should be abandoned as a wild experiment.

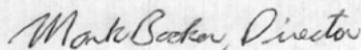
***Again, the East District strongly urges the Federal Caucus that the final All-H Paper should include an option to reduce mainstem Columbia flow augmentation to no more than 4 million acre feet per year including a shift in timing to late summer and fall. That option should also become the preferred alternative.***

***The East District recommends that the options and alternatives calling for the breaching of the Snake River dams be dropped from further consideration.*** Breaching those dams would result in higher energy costs for East District farmers and could result in increased transportation costs for their agricultural supplies and crops.

The costs to eastern Washington as a whole though cause the East District to oppose breaching those dams for reasons beyond just the direct local impacts. The loss of 37,000 highly productive irrigated acres, the loss of 5% of the region's hydropower capacity and the loss of navigation to much of the inland northwest are extremely excessive in view of the statistical, highly theoretical and the long term (50 year) nature of any improvement in salmon recovery.

In addition to the excessive costs and uncertain benefits the dam breaching alternatives should be dropped because the divisiveness of these proposals detract from the region's ability to focus on achievable salmon recovery measures.

Sincerely,



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