



**WASHINGTON STATE
FARM BUREAU**

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APR 10 2000

March 31, 2000

Department of the Army
Walla Walla District Corps of Engineers
Attention: Lower Snake River Study Team
201 North Third Avenue
Walla Walla, WA 99352-1876

Re: Lower Snake River Juvenile Salmon Migration Feasibility Study: Draft Feasibility Report and Environmental Impact Statement

Dear Sir or Madam:

The Washington State Farm Bureau represents farmers and ranchers in every county in Washington State. We are a general agricultural organization representing 20,000+ members. We thank you for the opportunity to provide comments on the above noted feasibility study and salmon recovery efforts in the Pacific Northwest.

We appreciate you extending the deadline for comments to April 30, 2000. Due to the 4(d) rule process and the Agriculture, Fish & Water process we simply did not have the manpower to provide comprehensive comments within the original timeline. We respectfully request that you insert the following comments into the public records.

We want to emphasize for the record that our members support efforts to strengthen salmon runs throughout the Northwest. Many of our members are currently involved or have been involved in on-the-ground conservation efforts for the past decade. Farm Bureau is also actively involved in the Agriculture, Fish & Water process that is addressing voluntary measures that agriculture can take in riparian management areas critical for salmon recovery. Unfortunately, agriculture's efforts remain all too frequently unrecognized and unrewarded.

Our members believe that dams are essential to the economy of Eastern Washington. Dams provide clean, affordable power generation; clean, affordable transportation of goods to and from market; irreplaceable water for irrigation and recreation; and flood control. We firmly believe that it is possible to have both dams and salmon.

The Washington State Farm Bureau urges the Federal Caucus to reject alternatives that call for breaching dams or drawing down reservoirs, and to pursue options that will strengthen salmon runs without destroying dams. The science developed through years of research by members of the Federal Caucus and others supports this concept. We believe that there are numerous options that would significantly enhance salmon runs without breaching dams or drawing down reservoirs.

The most recent studies suggest that breaching dams would cost hundreds of millions of dollars and disrupt the economy of the region, while returning only minimal or speculative benefits for salmon over non-breaching alternatives. In fact, those same studies suggest that breaching the dams could well have a negative effect on the environment -- through the release of decades of built-up silt, an increase in truck and rail transportation to replace low-cost, low-pollution barge transportation, the need to replace lost

power generation through increased use of fossil fuels, and the loss of riparian habitat that now supports many other species.

1 The loss of the transportation caused by dam removal would have a major impact on ensuring that agriculture has competitive shipping options. Your summary assumes that there will be no changes in relative prices of transportation services for agriculture producers in the region. We must respectfully disagree with this assumption.

2 Currently farmers face a monopoly within the railroad companies, which will waste no time increasing the shipping costs once they control the market. Not to mention that this is happening at the same time that our farmers are losing rail spurs, which are being eliminated by the railroad companies in order for them to increase their bottom line.

3 Barging of commodities is a critical factor in remaining competitive not only for our farmers in Washington State but also for our fellow farmers in western North Dakota, Montana, Idaho, and Oregon. It is imperative that the Corps also takes into consideration that additional transportation costs to elevator operators, grain merchandisers and other agricultural shippers are borne by farmers in the form of lower grain prices when farmers sell their grain at the elevator. Removing barge transportation service for our farmers will decrease the price of their grain, decrease their profitability and have serious economic consequences for our state as well as the entire region.

4 We have grave concerns in regards to the trucking industry being able to provide meaningful competition to the railroads. And if they are able to provide competition the study does not even take into consideration that increased trucking will place considerable strain on the highway and rural road system of our state. We do not believe the existing infrastructure is prepared to handle the additional hundreds of millions of bushels of grain that are currently barged on our river transportation system. Our state Legislature held hearings during the past year in regards to the impact that dam removal would have on Washington's transportation corridors with the ultimate price tag being in the billion-dollar range.

5 The loss of electrical power generated by the dams, which are being considered for removal is of great concern to our members. Studies indicate that our farmers will face an increase of between 1.9 to 6.7 percent in electricity rates. Since electricity is another cost of production for our farmers, any increase in electrical rates could make the difference in whether their farms remain profitable. This is especially true given the current low market prices that all farm commodities are facing. We firmly believe that the regional power issue has not been adequately addressed and must become an important part of the economic equation.

6 Our members and their families are an important part of the economy that would be disrupted by dam removal. Therefore, we respectfully request that breaching the dams be removed as an option. This single action would remove one of the most contentious and divisive issues in the Northwest regarding salmon recovery and allow the community to move forward with meaningful salmon recovery measures.

To continue discussing options that are so strongly opposed by the people whose livelihoods would be most drastically affected is counterproductive. We urge you to move beyond the destructive debate over dams that is overshadowing more realistic options and to instead pursue non-breaching alternatives to strengthen salmon runs.

The Federal Caucus has, to its credit, acknowledged that there is no silver bullet when it comes to salmon recovery. The Caucus has also acknowledged that there are many issues besides dams to consider in salmon recovery, including overfishing, predation by marine mammals and fish-eating birds, and ocean

conditions. Therefore, we believe that attacking only one H (hydropower) in the process is simply not prudent. We agree with the Federal Caucus Citizen Update Issue 2 that reinforces that it is important that we must address all the H's in order to resolve the problem.

And while there has been some criticism that the Federal Caucus has not moved fast enough, the Washington Farm Bureau believes that you have acted wisely in waiting for the completion of critical scientific and economic studies – studies that now suggest there are more prudent ways to proceed than breaching dams.

We have, however, been disappointed with some members of the Federal Caucus. One agency, National Marine Fisheries Service, blatantly denied water to irrigators in the Methow Valley before issuing a biological opinion that is required by the Endangered Species Act.

The same agency has said publicly that it only cares about fish, not about people, and is now proposing to promulgate rules and regulations that it admits are based on scientific studies that aren't finished and have not been submitted to any other agency for peer review.

5 And that same agency has indicated that public hearings are a waste of time. That it plans to adopt those rules regardless of what the people want. It even scheduled one public hearing in the Olympia area ... and then had the police turn people away.

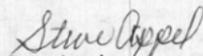
That agency has consistently and deliberately misrepresented the Endangered Species Act in public forums. It has refused a request from a U.S. senator to extend the 4(d) rule comment period. And it has set a deadline for adopting those rules that clearly indicates that it never intended to take public comment into consideration. That's not what representative government is all about.

We are pleased that the Federal Caucus, as a group, recognizes that the Endangered Species Act requires agencies to rely on sound science ... science that clearly shows that there are feasible alternatives to breaching. We are pleased that the Federal Caucus recognizes that its decisions must balance the needs of the fish with the needs of the people ... especially the people who would be most affected.

Within the area being considered under the All-H Paper are some of the most productive farmlands in the world. Many of the farmers in this area depend on water from reservoirs, and other benefits made possible by the system of dams, that individuals – most of them from outside the region – now want to destroy. We urge you to consider the huge costs to farmers, our state and others in the region of dam breaching. We urge you to adopt less costly and less intrusive means of restoring salmon habitat. We urge you to balance the needs of family farmers and our economy with the needs of the salmon.

Again, thank you for the opportunity to provide comments. We reserve the right to revise and extend our comments in the future.

Sincerely,



Steve Appel
President