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APR 10 2000

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March 30, 2000

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Department of the Army  
Walla Walla District Corps of Engineers  
Attention: Lower Snake River Study  
201 North 3<sup>rd</sup> Avenue  
Walla Walla, WA 99362-1876

**VI A E-MAIL AND REGULAR FIRST CLASS MAIL**

Re: Draft Lower Snake River Juvenile Salmon Migration Feasibility  
Report/Environmental Impact Statement (FR/EIS)

Dear Sir/Madam:

These comments are submitted in connection with the Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement dated December, 1999.

**GENERAL COMMENT**

**Defining the Problem.**

I believe that the Corps has not properly defined the problem. The Corps stated "the problem is that Columbia Basin salmon and steelhead populations continued to decline." Unfortunately, the FR/EIS does not address the problem. The real question is: how can the federal government, including the Corp, stop the decline in salmon and steelhead populations? The FR/EIS does not address some extremely important issues. Those issues include: excess harvesting in the ocean; extraordinary predation by marine mammals and birds, including the Caspian Tern; and the gill net harvesting of adult salmon in the Columbia River by the Treaty Tribes.

**Feasibility Study.**

1 The Feasibility Study only addresses the effects of the four Lower Snake River Dams on juvenile adult fish. I do not believe that the study adequately addresses the impacts of the dams as compared to the impacts of other activities and actions on the Snake River anadromous fish.

**Possible Actions/Effects.**

Alternative I.

2 The discussion of effects is deficient in that it does not mention the continued use of the reservoirs for recreation. Recreation has become a significant activity in the reservoirs.

Alternative II. - Maximum Transport of Juvenile Salmon.

3 Again, the continuation of recreational use of the reservoirs is not mentioned. However, a "slight reduction in extinction risk for listed stocks (CR) is mentioned." I do not believe there will be any reduction in extinction risk unless adult fish harvesting, juvenile fish predation, and adult fish predation is controlled.

Alternative III. - Major System Improvements.

4 Again, the continued recreational use of the reservoirs is not mentioned. Without control of harvesting and predation, I do not believe there will be any reduction in an extinction risk. In deed, I believe a fair study which examines the decline in anadromous fish in rivers where there are no dams, but where there is in-river harvesting will show a decline in numbers of adult anadromous fish which is similar to that of the Columbia and Snake Rivers.

Alternative IV. - Dam Breaching.

5 The conclusion is made that there will be "moderate reduction in extinction risk for fall chinook and steelhead . . ." I do not believe that there is any evidence to support this conclusion. Other rivers that do not have dams but do have substantial development along the rivers and in-river gill netting show substantial declines in anadromous fish which are similar to the Columbia and Snake Rivers.

The conclusions also show an effect of a "gain in recreation opportunities." I do not believe there is any evidence to support this conclusion. In fact, there will be a decline in recreational activities that depend upon slack water in a reservoir. I suspect the "gain in recreation" conclusion is based upon an assumption that there will be more anadromous fish available for harvest. I do not believe that there is any basis for this conclusion unless or until in-river harvesting by Treaty Tribes and ocean harvesting is regulated and controlled and predation by marine mammals and birds is controlled.

6 Effects on Recreation.

Under the "Effects on Recreation", it is known that there are thirty-three developed recreational sites on the lower Snake River reservoirs, and approximately two million visitors use these facilities each year. If the dams are breached, I believe that there will be a substantial diminishment of recreational activities on the lower Snake River.

7 | In summary, I believe that the draft Feasibility Report/Environmental Impact Statement does not adequately address the causes of the decline in anadromous fish. For example, on page A2-2 under Section 2.2.1, there is no mention of the Treaty Tribe gill net harvesting of adult anadromous fish in Zone 6 on the Columbia River. Last summer, there were articles in the newspaper on tribal members having pick-up truck loads of fish on the highways along the Columbia River in Washington and Oregon and selling those fish from their trucks. States are generally prohibited from regulating tribal fishing. Tribes may have some political difficulty in regulating their own members. I urge the federal government to consider regulating the anadromous fishery along the Columbia and Snake Rivers.

8 | There is no mention that the reservoirs have slower moving water. Don't the adult fish have an easier time swimming upstream in slower water? This is not mentioned in the report.

#### 2.2.3 Downstream Migration Stage.

9 | At page A2-2, there is a discussion concerning the downstream migration. There is some implications that the slow-moving water in reservoirs interferes with the migration of fish. It is my understanding that the studies that have been done show that the reservoirs have little effect upon the timing of the migration of fish. In addition, of course, the transportation of the juvenile fish has proven to be very successful.

#### 5.2 Adult Harvest And Upstream Passage

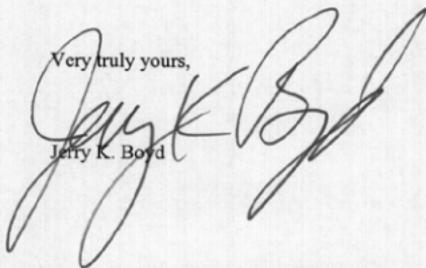
10 | There does not appear to be any mention of the in-river gill net harvesting of adult fish in the Columbia or Snake River. Having driven along the Columbia River and seeing the floats on the gill nets all along the shores on both sides of the Columbia River, it is a miracle that any adult fish could pass upstream. It is my understanding that adult fish tend to swim along the shores where the currents are slower, which is precisely where the gill nets are located. Failure to address the gill net harvesting in the Columbia River is a major flaw in the analysis.

11 | I urge the Corp of Engineers to make a study of some of the significant legal developments concerning Treaty Tribe fishing in the Columbia River and possibly the Snake River and its tributaries. I suspect that there may be a significant correlation between the success of tribes in the United States courts in establishing their fishing rights and the decline of anadromous fish in the Columbia and Snake River.

### CONCLUSION

The Feasibility Report and Environmental Impact Statement have grossly under estimated the real cost of the removal of the dams. I strongly oppose such removal. I do not believe such removal is supported by science. Furthermore, removal of the dams is bad public policy.

Very truly yours,

A large, stylized handwritten signature in black ink, appearing to read "Jerry K. Boyd". The signature is written in a cursive, flowing style with large loops and a long horizontal stroke at the end.

Jerry K. Boyd