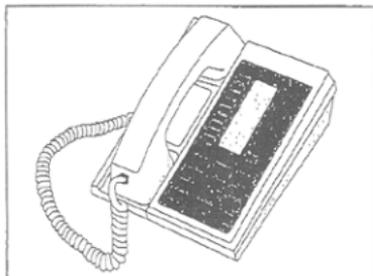


Date: 1 March 00

FAX FROM: US ARMY CORPS OF ENGINEERS  
NORTHWESTERN DIVISION  
NORTH PACIFIC REGION  
PROGRAMS MANAGEMENT  
PLANNING DIVISION



FAX NUMBER (503) 808-3866

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Number of Pages (including cover sheet) 7

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MAY 6 2000

**PUBLIC HEARING TESTIMONY ON THE U.S. ARMY CORPS OF ENGINEERS DRAFT ENVIRONMENTAL IMPACT STATEMENT/LOWER SNAKE RIVER JUVENILE SALMON MIGRATION FEASIBILITY REPORT & NATIONAL MARINE FISHERIES SERVICE "ALL-H" PAPER**

**By**  
**Liz Hamilton**  
**Executive Director**  
**Northwest Sportfishing Industry Association**

Good evening, my name is Liz Hamilton and I am the Executive Director of the Northwest Sportfishing Industry Association. I represent several hundred businesses in the Northwest and beyond that employ thousands of people throughout the region and rely upon salmon for their livelihoods. I am here tonight to voice NSIA's strong support for the adoption of an alternative that requires removal of the four dams on the lower Snake River and to expose a huge farce.

The question of whether to remove the four lower Snake River dams is really a question of livability. Who are we in the Northwest, and what are we about? The Pacific Northwest was once defined as "anywhere salmon go." Salmon are the symbol of the Northwest's heritage -- Salmon define the Northwest culture, economy and environment. But, if we don't make a decision to remove these dams soon, we will be giving up a large part of the Northwest's identity and spirit.

The sportfishing industry is inextricably tied to the health of this symbol. Sportfishing is, in fact, the mechanism for sharing our special treasure with the rest of the country, and in fact, with much of the world. Our industry adds tremendous economic resources to this region (nearly \$3 Billion annually-see attached); helping to make the northwest cities and towns more livable. Sportfishing also supports many tourist dependent industries such as hotels, restaurants, gas stations, and retail shops. In addition, we bring a multitude of employment opportunities. For example, The sportfishing industry provides hundreds of family-wage jobs in the Portland area alone.

And yet, now both the U.S. Army Corps of Engineers' draft Environmental Impact Statement (DEIS) and the National Marine Fisheries Service (NMFS) "All-H" Paper seriously underestimate the true benefit of this industry and instead seem to establish an all-out attack on this industry while completely ignoring the major cause of salmon declines in the Snake River; the hydroelectric system.

We are looking at a Federal Family that is trying have its cake and eat it too!  
On the one hand, we have the Corps determining in their DEIS's report that

our jobs don't count, and on the other hand we have the NMFS's suggesting that our impacts on Snake River stocks are so great that our fisheries must be cut 50 to 75% further to save the salmon. Which is it? If downriver fisheries are having such an impact, then why don't the economics of a restored recreational fishery below Bonneville, count? Because our jobs have never counted. It appears as if the Federal Government is willing to sacrifice the non-Indian fishery, call it "Salmon Recovery" give the high fives and go home. This is a great farce because it won't work and it's not fair.

2 | The tactic of sacrificing the fishing community for the dams is an old one: Back in 1964 directed harvest of Snake River Summer Chinook was eliminated. In 1976 fisheries were ended for Snake River Spring chinook. Both species are teetering on the brink to this day, despite a combined 60 years of fishing closures!

3, 4 | Most of the DEIS's focus on annual recreation value is on non-fishing river recreation such as camping, hiking, and rafting. The DEIS unfairly limits the estimated value of recreational fishing to no more than \$33 million per year and completely ignores the value of increased fishing recreation below the confluence of the Snake and Columbia Rivers. The DEIS's analysis only addresses values for activities upstream of the confluence. And despite claims in the Anadromous Fish Economic assessment that the recreation analysis would count downriver recreation value, neither potentially increased downriver nor ocean recreational fishing values appear in the DEIS. This failure is conspicuous and goes counter to common sense. Our estimates and past history indicate that downstream recreational fishing values will be significant as endangered salmon and steelhead stocks recover, allowing increased catch and activity all along the Columbia-Snake river system.

5 | For example, in the main stem Spring Chinook fishery below Bonneville, the early '70's saw up to 150,000 angler trips participating in the fishery. In 1996 dollars, the direct expenditures averaged \$83.00 per angler trip. The economic benefit for the angler trip is \$150.00. In the 1999 fall chinook fishery, approximately 30,000 angler days were eliminated for ESA constraints. If the Corps were to have added the value of these lost fishing opportunities to the lost ocean fishing opportunities, their lowball estimate of sportfishing values would have to be doubled.

6, 7 | The DEIS also unfairly limits the value of fishing in at least three other significant ways. First, the Corps chose to use the "low use scenario" instead of the medium or high use scenarios. The low use scenario excludes everyone but those who both returned the Corps recreation survey and stated that they would definitely recreate. Anyone who said that they might recreate is excluded from the low use scenario and the low use scenario assumes that if you did not return your survey to the Corps, you won't recreate at all. Again, this flies in the face of common sense. Second, the Corps' analysis ignores potential visitors from outside the Pacific Northwest and California, even though data from other wild rivers shows that 33 percent of visitors to free-flowing rivers in Central Idaho come from more than 1000 miles away (DEIS p. I3-49).

NSIA's experience clearly indicates that this assumption is unfounded. Fully one-quarter of the angler days in the region are from out of state clientele (see attached Sportfishing Economic Summary). The Corps' bias against the validity of out-of-region visitors should be removed from the DEIS. Finally, the Corps analysis unfairly limits the value of fishing by failing to even complete an analysis of the social impacts on fishing communities if the dams are not removed and these fish

6, 7  
cont. go extinct. Should the Federal Government succeed in eliminating the non-treaty fisheries impacts on Snake River Fall Chinook, the 120,000 angler days would be robbed from the region. This represents a loss of nearly \$18 million in economic benefit. All to gain a 1% decrease in human-caused mortalities! It is incredible that the Corps could so blatantly ignore a major contributor to the economic fabric of this region. The Corps' economic estimates must be revised to address these concerns.

Similarly, the NMFS "All-H" paper is another disingenuous piece of work. While the agency claims to address all four factors of salmon decline, the agency is really only focused on two factors: harvest and hatchery. NMFS's actions and analysis indicate that they lack the political will to go after the true salmon killers; the federal dams. We have seen years of techno-fixes at the dams; increased barging and trucking of juvenile salmon, and a multitude of other actions to retain the status quo of the federal hydro system. None of these factors has fundamentally worked to recover salmon runs. Instead, we have continued to see salmon runs plummet.

8 Then, after years of scientific analysis and debate, a group of tribal, federal, state, and independent scientists told the agency what every 6<sup>th</sup> grader knows: dams are bad for salmon and if we want to recover all the Snake River salmon species, we must breach the four lower Snake River dams. Instead of embracing this multi-year analysis, NMFS choose to ignore PATH's recommendations and instead, began a whole new process, the Cumulative Risk Initiative (CRI), in search of the "right" political answer, rather than the right scientific one, to addressing hydro operations. This action made it clear that the agency was unwilling to follow peer-reviewed, thorough science, to address adverse impacts from hydro.

9 NMFS actions on habitat are similarly concerning. Although NMFS talks about habitat restoration, its current actions speak louder than its words. NMFS has yet to consultant with the Bureau of Reclamation on illegal water spreading in the region; We don't see NMFS suggesting that 50-75% of water withdrawals are eliminated, and NMFS is in the process of approving the dredging of the Columbia estuary, an area it also identifies as key to salmonid recovery; and it has done no real analysis on the needed habitat restoration efforts. NMFS' own analysis to date acknowledges that the agency is unclear whether the improvement it thinks it would need to help avoid salmon extinction "are actually feasible" (CRI at 37). This agency is clearly not serious about habitat restoration. Furthermore, the temperature pollution in the Columbia continues to reach near lethal levels for salmonids every year.

10 What is so incredibly striking about this approach is that by attacking harvest, the agency's own analysis indicates that it cannot meet its legal obligations. U.S. laws and treaties require the restoration of harvestable runs of Snake River salmon. However, the 50-75% cuts in harvest suggested as an alternative to dam breaching in the All-H paper cannot produce "harvestable" runs. There is already little harvest on Snake River sockeye, spring chinook, summer chinook, and fall chinook. In fact, 50% cuts in both non-tribal and tribal fisheries for these species would only result in 734 saved fish (based on data compiled from Washington Department of Fish and Game and Oregon Department of Fish and Wildlife's Status Report: Columbia and Snake River Fish Runs and Fisheries, 1938-1997, June 1998). In contrast, PATH found that partial dam removal would increase fall chinook spawning habitat by 77% and would restore 8,300-24,000 additional fall chinook

10 cont. | spawners. While harvest cuts may help avoid extinction, such actions will not comply with legal requirements of harvestable runs and recovered stocks.

11 | In addition, the results gained in further curtailing of harvest simply pales in comparison to addressing mortality caused by hydro. Breaching these dams could bring back tens of thousands of more salmon than could be saved through further harvest cuts. Less than 1 percent of the human-caused mortality of wild Snake River fall chinook salmon is attributable to the sportfishing industry. The hydro system, on the other hand, causes approximately 92% of human-caused mortality of these fish. The differences are striking and yet NMFS's All-H paper clearly moves away from addressing hydro's impacts on salmon.

This emperor has no clothes; this is not a recovery plan. The All-H paper at best goes after just two of the four H's attributing to salmon declines. And it sharply attacks the one element, the fisherman, that it feels is the weakest politically; that is the one constituency that NMFS believes has the least political power. Well, that is no way to make a decision about the continued existence of a species. That is not science, that is politics. **This industry will not stand for this treatment. While we are happy to do our part, we will not continue to sit by and watch our livelihoods disappear while NMFS and the Corps continues to as Judge Marsh said, "Tinker around the edges of a system that cries out for a major overhaul.**

The fishing community has paid enough. It is time to turn our attention to the real salmon harvesters - the dams. If we are to save Snake and Columbia River salmon, the Administration must find the political will to take on these killers and produce a real plan that will recover these species. Enough is enough. Let's get past the politics and get on with truly trying to right the mistakes of the past and save these fish.

Thank you for the opportunity to testify today. Please submit these comments for both the Corps DEIS and the NMFS All-H paper.

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In 1996

• Economic Output	\$2,993,298,116
• Jobs	38,537
• State Sales Tax	\$59,783,243
• State Income Taxes	\$20,944,418
• Federal Income Taxes	\$81,478,275
• Sport Fish Restorations Excise Tax Apportionment	\$12,248,565
• Tourists	536,936
• Total Anglers	2,146,422
• Total Days Spent Fishing	25,259,961

12

Source: Vishwamie Maharaj, Ph.D. American Sportfishing Association; Funded by the U.S. Fish and Wildlife Service under Cooperative Grant Application No. 14-48-0069-1237.

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Snake River Wild Fall Chinook  
Sources of Human-Caused Mortality  
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