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PUBLIC UTILITY DISTRICT NO. 2 OF GRANT COUNTY

MEETING OUR CUSTOMER ENERGY NEEDS IN A COST CONSCIOUS MANNER.

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April 28, 2000

Department of the Army
Walla Walla District Corps of Engineers
Attention: Lower Snake River Study
210 North Third Avenue
Walla Walla, WA 99362-1876

RE: Comments on Corps of Engineers Lower Snake EIS

Ladies and Gentlemen:

We would appreciate your consideration of the following comments on the above referenced document.

Scope and Context of the Analysis is Unreasonably Narrow

1 The health and abundance of salmon that inhabit the Pacific Northwest are of concern throughout the region. Overfishing, dams and other human developments, habitat degradation, poor ocean conditions, predation, and poor performance from hatchery fish along with other factors have all impacted Northwest salmon runs. It is inappropriate to look at salmon issues in a vacuum by focusing on four lower Snake River dams. To be adequate, impacts must be analyzed in the context of the entire salmon life cycle.

The EIS Ignores the Best Available Scientific Information, Analyses and Conclusions

2 The alternatives the Corps evaluated ranged from existing conditions to breaching of the four lower Snake River dams. Major changes affecting dam passage survival have already been made, and cumulative survival through these dams and their reservoirs is currently estimated at 86 to 94 percent (NMFS Northwest Fisheries Science Center White Paper, Passage of Juvenile and Adult Salmonids past Columbia and Snake River Dams, page 72).

Ten years ago the best estimate was that only 10 to 30 percent of salmon smolts survived their trip past the dams. However with increased spill levels, bypass systems and barge transportation, the cumulative survivals are 50 to 60 percent. These levels would likely far exceed the survival levels that could be expected in the years immediately following breaching. This empirical data is available from the NMFS Northwest Fisheries Science Center White Papers and should be relied on in the EIS rather than the questionable modeling assumptions used in processes such as PATH.

The EIS Ignores Reasonable Alternatives

3 The Corps limited its analysis to four alternatives ranging from existing conditions, maximum transport of fish and major system improvements to dam breaching. Best available information demonstrates that there is next to nothing to gain by breaching these four projects. Further, the technology of moving salmon safely past the dams includes more than the standard barging, spill and flow regimes and fish ladders. Additional passage measures like surface bypass collectors, turbine improvements and other approaches less drastic than breaching should have been given adequate consideration.

The EIS Fails to Adequately Assess the Environmental Impacts of Breaching

4 Breaching is not an event, it is a process. It would likely be 12 to 15 years or longer before the Snake River would have a stable channel with riparian vegetation and typical riverine function. . During the construction period migrating fish would have to be moved around this stretch of the river, putting chinook, steelhead and sockeye smolts in even greater peril. The EIS references to detrimental effects for two to three years after dam breaching due to suspended sediments and possible burial of rearing habitat. However, there is no mention of pollutants that may be tied into the reservoir sediments or any proposed actions to remedy what appears to be a substantial water quality problem. There is no mitigation proposed for the fact that "50 to 75 million cubic yards of existing sediments may be eroded and move downstream" for as long as 5 to 10 years.

The EIS also ignores the impacts of dam removal including the resulting increase in pollution from alternative energy sources and the addition of hundreds of trucks and railroad cars needed to transport commodities. The impacts of the proposed action on flood control and navigation are not well considered.

The EIS Fails to Adequately Consider Social and Economic Factors

5 Dam breaching would unalterably affect agricultural, food processing and river transportation industries and eliminate many jobs and family farms. The EIS estimated that electricity rates throughout the Northwest could increase from 1.9 percent to 6.7 percent. Under the overall economic analysis ranging from the cost of replacement power to loss of transportation and irrigation benefits there is an overemphasis on national economic development (NED) and a 100-year horizon for planning. In addition, the Northwest Power Planning Council has already concluded that reduced generation from salmon measures has reduced the reliability of the Northwest power grid and the probability of critical electricity shortages has increased beyond acceptable levels. The breaching of the four Snake River dams would likely exacerbate the problem to an even greater extent.

To be able to review the alternatives effectively, the information must be presented in more realistic time frames and in more precise, localized effects. "Net" economic benefits are of little value to someone whose business, livelihood and economic viability is at risk. The net benefits for increased recreation from a newly created "free flowing" stretch of the lower Snake River seems to have been developed through some unknown modeling technique, without regard to the demand for or actual recreation numbers in the stretch of river above the dams.

It Would be Inappropriate to Rely on Uninformed Public Opinion as a Basis for Decision-making

6 A significant element in the EIS review process was a series of public hearings designed for people to provide comment on these serious and complex issues. Unfortunately, the hearings devolved into media events calculated to evoke a yea or nay response from attendees regardless of their technical familiarity with the issues. This is an inappropriate basis for drawing any conclusions regarding the propriety of the proposed action. The number of people who testify in support or against a given option has never proven to be a satisfactory substitute for analysis when formulating good public policy, and lends credence to those who take positions without benefit of the facts. All that can be expected to result is a prolonging of the controversy at considerable additional public expense. We trust that the headcount taken at the public hearings will not be used to draw any conclusions regarding the reasonableness of the analysis or conclusions drawn in the EIS.

Conclusions

7 The environmental analysis of the options for the lower Snake projects represents an immense investment of time and money. The limited scope and the lack of appropriate consideration of the overall salmon life

cycle render the analysis arbitrary and substantially flawed. It is hampered by the additional shortcomings listed above and for those reasons is not a sound basis for the Corps to make an informed decision on a preferred alternative. A Record of Decision based on the EIS would be indefensible.

7 cont. Despite these shortcomings, we believe that parts of the study have some value. For example, the economic analysis pointed out some of the impacts that dam breaching would impose on the Northwest. However, the breaching option under review is not supported by the best available information especially in the areas of improvements that have been made since the construction of the federal power system and the results of recent survival studies.

As indicated in our comments, we do not believe a proposal to breach the four lower Snake River dams is supportable by the analysis in the EIS and, therefore, we oppose the proposal. We encourage you to rise above the extreme arguments that have polarized the region. Please obtain and use good, credible science and work toward a comprehensive solution that is reasonable and achievable.

Sincerely,

Douglas M. Ancona, Manager
Natural Resources and Regulatory Affairs

cc: Senator Gorton
Senator Murray
Rep. Nethercutt
Rep. Hastings
Rep. Chenoweth-Hage
Rep. Simpson
Will Stelle, NMFS
Eric Ilgenfritz, NMFS
Rep. Norm Dicks
Governor Locke
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