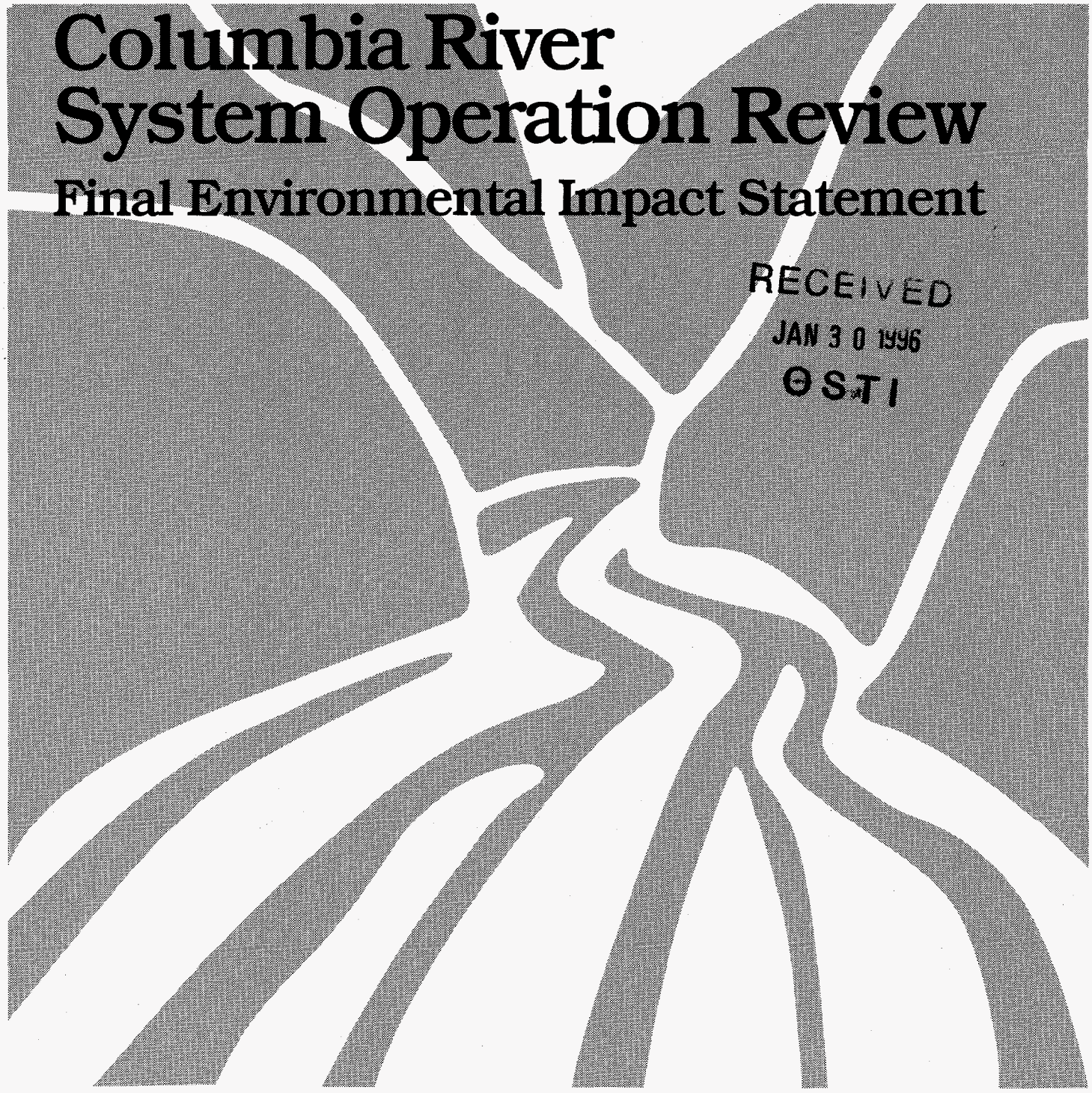
Columbia River System Operation Review

Final Environmental Impact Statement



Appendix T *(second continued volume)*

Comments and Responses

BONNEVILLE POWER ADMINISTRATION

US Army Corps of Engineers
North Pacific Division

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF RECLAMATION

DOE/EIS-0170~ app. T- 2nd Cont. Vol

November 1995

PUBLIC INVOLVEMENT IN THE SOR PROCESS

The Bureau of Reclamation, Corps of Engineers, and Bonneville Power Administration wish to thank those who reviewed the Columbia River System Operation Review (SOR) Draft EIS and appendices for their comments. Your comments have provided valuable public, agency, and tribal input to the SOR NEPA process. Throughout the SOR, we have made a continuing effort to keep the public informed and involved.

Fourteen public scoping meetings were held in 1990. A series of public roundtables was conducted in November 1991 to provide an update on the status of SOR studies. The lead agencies went back to most of the 14 communities in 1992 with 10 initial system operating strategies developed from the screening process. From those meetings and other consultations, seven SOS alternatives (with options) were developed and subjected to full–scale analysis. The analysis results were presented in the Draft EIS released in July 1994. The lead agencies also developed alternatives for the other proposed SOR actions, including a Columbia River Regional Forum for assisting in the determination of future SOSs, Pacific Northwest Coordination Agreement alternatives for power coordination, and Canadian Entitlement Allocation Agreements alternatives. A series of nine public meetings was held in September and October 1994 to present the Draft EIS and appendices and solicit public input on the SOR. The lead agencies received 282 formal written comments. Your comments have been used to revise and shape the alternatives presented in the Final EIS.

Regular newsletters on the progress of the SOR have been issued. Since 1990, 20 issues of *Streamline* have been sent to individuals, agencies, organizations, and tribes in the region on a mailing list of over 5,000. Several special publications explaining various aspects of the study have also been prepared and mailed to those on the mailing list. Those include:

The Columbia River: A System Under Stress
The Columbia River System: The Inside Story
Screening Analysis: A Summary
Screening Analysis: Volumes 1 and 2
Power System Coordination: A Guide to the Pacific Northwest Coordination Agreement
Modeling the System: How Computers are Used in Columbia River Planning
Daily/Hourly Hydrosystem Operation: How the Columbia River System Responds to Short–Term Needs

Copies of these documents, the Final ElS, and other appendices can be obtained from any of the lead agencies, or from libraries in your area.

Your questions and comments on these documents should be addressed to:

SOR Interagency Team
P .O. Box 2988
Portland, OR 97208–2988

DOE/BP--2754

COLUMBIA RIVER SYSTEM OPERATION REVIEW

Draft Environmental Impact Statement

PUBLIC HEARING

Sandpoint, Idaho

Monday, September 19, 1994

7:21 p.m.

Phil Thor, U.S. Department of Energy, Bonneville Power Administration

Witt Anderson, U.S. Department of the Army, Corps of Engineers, North Pacific Division

John Dooley, U.S. Department of the Interior, Bureau of Reclamation, Pacific Northwest Region

Facilitator: Hugh Moore

Reported by: Byrl Cinnamon, CSR

I N D E X

Letter TSAN1

Comments

from the county next door, Pend Oreille County. I work for Pend Oreille Newsprint Company. And I appreciate this opportunity to make my input.

First of all, I'd like to say that, when power rates go up in the region, industry is devaluated so that, when they talk about -- in this region when they talk about property values going up, property values will go down. And I think that it's only fair that, when you -- if you want to include property values up here, you need to include the fact that industry will be devalued. And in fact the county governments and those sorts of people need to know because that impacts their operating costs, and that should be included. I hope that that is.

TSAN1-1

Another thing I'd like to say is that, when I look at the document -- and I look at it, and it looks to me like it's written for a full environmental impact statement for all the items for all the things listed under all the options. I have put together environmental impacts before, and as private industry -- just for our mill it was, like, that thick (indicating). And the detail we went into included all these types of things like property values, job loss. I mean, the whole thing. We got into a lot of detail. I question whether this draft holds up to the

TSAN1-2

Responses

TSAN1-1. The power and economic impact analyses presented in the EIS address impacts on power rates and the consequent regional economic effects. See also Common Response No. 8.

TSAN1-2. The SOR agencies believe that the EIS meets NEPA standards and adequately addresses the relevant impact issues.

Letter TSAN1

Comments

TSAN1-2

same standards that are held up for industry to meet. I question that very much.

TSAN1-3

Also, what's most important to me is, when they come out to an area like this, I want to hear what's really going to happen. And I want to hear criteria they're going to use to determine that. And that's what I would like in this statement. Before I can really tell you my opinion -- and I read the back and all that stuff in there -- I would like to know the real criteria that's going to be used to make a decision. And there's all kinds of options of who is going to make the decision. I believe that Congress gave approval for each one of these projects, and they had certain criteria, operating criteria, for these projects. For agencies to change that I think is very questionable because Congress had something in mind, and I think -- in back it says that a lot of these required Congressional action or Congress act. I think the whole thing does. So I would really -- I

TSAN1-4

really think that we want our elected officials running things. We don't want agencies running things. And when an elected official decides how to do something, that's what we should stick to. And that's an important thing because you don't want agencies running your state. You want your elected

Responses

TSAN1-3. The process and criteria to be used in making the SOR decisions are discussed in Chapter 8 and the Summary of the Final EIS.

TSAN1-4. Thank you for your comment.

Letter TSAN1

Comments

officials who in turn direct agencies.

When this presentation goes to the different areas, it's very hard for us to handle it because the presentations are directed towards the audience in a lot of cases, and they're appealing to the audience. I'm in the next county. I don't want SOR 4 -- I'll tell you that point blank -- because it adversely affects the mill that I work at. It raises our operating costs. I mean, it jeopardizes our industry. I'm not for that. So when they come around and they do these things, I'm interested in concrete direction, where they see they're headed. And then we can really get on with this thing. As long as the picture that's presented slides around to meet the audience, it's very hard for us to focus. So I would like more focus on one. If it's a bitter pill for me to swallow, I can handle that. If it's a bitter pill for you to swallow, I think you're ready to handle that. I mean, we've gone just about as far as we can be pushed with all this stuff being shuffled all around. So let's go for what we're shooting for here, and then we can give you better comments.

Thank you.

MR. MOORE: Next is E. H. Robbins, and following Mr. Robbins will be a Ted Farmin.

TSAN1-5

TSAN1-6

Responses

TSAN1-5. Thank you for your comment.

TSAN1-6. The SOR agencies have consistently attempted to provide public information that is clear, focused, specific, and as informative as possible. The same information was presented at the public meetings throughout the region with added focus on items likely to be of specific local interest.

Letter TSAN2

Comments

MR. FARMIN: I'll pass. Thank you.

MR. MOORE: All right, sir.

Then following Mr. Robbins will be a Paul Hugh, I believe it is, or McHugh.

MR. ROBBINS: My name is Ed Robbins.

TSAN2-1 First of all, before I get into anything, under NEPA you have a Columbia -- you have your draft environmental impact statement here. Under NEPA I would like to know how the document was rated. I would like to know who rated it. And I would also like to know the technical expertise of those who rated the document. As I look at the document, which I have dealt with documents under Department of Interior, Department of Energy, and the Department of Defense for the last number of years, this document --

TSAN2-2 I don't want to hurt your feelings, gentlemen, but it's very poor. It doesn't come up with anything. The scope of the document is very poor. It doesn't address a worst case scenario in the case of a drought, demand for water power on Lake Pend Oreille, anything else like that.

TSAN2-3 We would also like to know that, if they're going to draw this lake down, is the Corps of Engineers going to permit people to remodel their docks so that they can adequately launch their boats

Responses

TSAN2-1. The U.S. Environmental Protection Agency reviewed the Draft EIS and assigned it a rating of EC–2. Please see Letter F6.

TSAN2-2. See Common Response No. 2. The historical water record used for the model analyses does include extreme water conditions.

TSAN2-3. See Common Response No. 8. Normal Section 404 permit procedures would apply to such a situation.

Letter TSAN2 Comments Responses

TSAN2-3

and everything else like that? Otherwise you have taken the property from us, the use of it, and of course, that would have to be looked at under a Fifth Amendment case, so the inverse condemnation since I can't use my property for which it was intended.

And what I'd also like to bring out is that in the past, since I have dealt with federal agencies and the EIS process, I have gone through what is referred to by the Air Force as a dog and pony show. I hope this isn't it. However, you have painted a very bright picture. But as we all know, anytime that a federal agency's -- and this time we have three of them involved -- are looking at our situation here, political power is going to be what determines what happens with our lake. Bonner County does not have political power. The people in the lower reaches of the Columbia River basin have that political power, all the tribes and what have you like that, so that any input here by the people of Bonner County in thinking they're going to get a resolve that would be positive for us, I think, is ludicrous.

I would like to see things happen differently, but as somebody else has already stated, if the tribe is going to fish with nets and everything, it seems as though that the people of

Letter TSAN3

Comments

Bonner County are going to end up being the ones that are going to pay for all of this. And it's a rather pathetic situation.

MR. MOORE: We now have ten commenters left to go. Mr. McHugh is next and will be followed by -- and I believe it's a Tony Mehlen, M-e-h-l-e-n.

UNIDENTIFIED SPEAKER: Tom Mehler probably.

MR. MOORE: All right. Mehler, M-e-h-l-e-r?

MR. MEHLER: I'll pass.

MR. MOORE: Okay. Mr. Mehler will pass. Then the next commenter will be a person, I believe their last name is -- looks like Parsens. Is there a Parsens who wants to comment?

MR. PARSENS: Yes.

MR. MOORE: Okay. You'll be next right after him, sir.

MR. McHUGH: My name is Paul McHugh. My address is Post Office Box 878. And I live in Sequim, Washington. And I'm over here because I'm a property owner on the Pend Oreille River near Laclede. And I acquired property on the river for recreation purposes and hope someday to be a homeowner and at least spend part of my time over in this beautiful country.

TSAN3-1

And I'd just like to say this. Any of the alternatives that provide for any sort of summer

Responses

TSAN3-1. See Common Response No. 8.

Letter TSAN3

Comments

TSAN3-1

drawdown is not acceptable to me as a property owner. That's the bottom line for me. I have attempted to read the various alternatives. I can't tell in those alternatives what of them actually do provide for the possibility of drawdown. I understand that there may be a mix of alternatives that finally come up. But no summer flow reduction.

TSAN3-2

As far as the alternative No. 4, I'm sure there's a lot of issues with that that I'm not aware of. The kokanee issue. I'm not opposed to that alternative, but I understand that there are some issues and costs associated with that that have to be viewed.

For better or for worse, you know, 50 -- well, 40 years ago this whole region was changed. When that dam was put in place and that reservoir was created, commitments were made to the people of this area, and commitments were made to me even though I'm a relative newcomer here. And I think that the Corps and Bonneville and Reclamation, all of you have a responsibility to we property owners who have been a part of this process and expect continuance of the way we've been treated.

I'd like to read some comments into the record about the whole issue in general now that I'm

Responses

TSAN3-2. Thank you for your comment.

Letter TSAN3

Comments

TSAN3-3

past the Pend Oreille part of it. "The Northwest's economy, environment, and fish stocks are under siege by environmental terrorists who will be satisfied with nothing short of removal of all main stem dams in the Columbia and Snake rivers. Lacking historical perspective, scientific basis, or economic justification, the region's media, politicians, fish agencies, and environmental groups have worked themselves into a state of hysteria especially over wild salmon. The region is not dealing with this issue rationally or calmly. There is no evidence that we know that we want to -- that we know we want to accomplish, but even if we did, that we are approaching this in a reasoned and systematic way. Instead, we seem to be seeking fragmented ecosystem management by popular political consensus rather than by science."

I'll submit the rest of these except for the fish portion that I'd like to read in my written comment before November. "With all this disruption one would think that some progress was being made on the salmon problem. But it is not. There are no goals or even a coherent program. No one knows how to define a stock of fish or even if there are any wild fish. No one knows the cost of various measures

Responses

TSAN3-3. Thank you for your comment.

Letter TSAN3

Comments

TSAN3-3

before ordering them up. New science is discouraged, and existing science is not used to predict the success of various measures. No one knows if the expected benefits or any measures are at least as great as its costs.

"And in the area of Lake Pend Oreille, the costs are tremendous, especially in the area of property values. There's absolutely no effort to prioritize measures so as to get the most fish per dollar spent. Instead, we have a fragmented approach based on politics, confrontation, and control, all without any accountability, goals, benchmarks, or deliverables.

TSAN3-4

"The salmon problem is not new. Since we began counting salmon in 1937 when Bonneville Dam was closed, the most returning adults were in 1988. 1988, I'll admit that those were not wild fish, but they were returning salmon. Runs were decimated by overharvesting in the late 1800's and never recovered. Ocean conditions, drought, and El Nino are more than controlling factors, so much so that the NMFS concedes that we are not likely to be able to measure the results of any of our efforts in the river.

"There's absolutely no difference in

Responses

TSAN3-4. See Common Response No. 6.

Letter TSAN4

Comments

TSAN3-4

survival between rivers with and without dams. We are spending a lot, as much as five times the entire NMFS national budget. The Bonneville Power Administration alone spent about 2.5 billion between '81 and '91 and 300 million in 1993. The BPA base budget in '94 was 351 million before the 1994 NMFS biological opinion added another 90 million and panicked, and the infamous spill program added another 73 million."

That's the time? Thank you very much.

MR. MOORE: The next commenter is, I believe, a Mr. Parsens, if I have -- do I have your name correct? Okay. Following Mr. Parsons will be a Gary deBlaquiere. All right. You'll be next.

MR. PARSENS: I'm Frank Parsens from Priest River, Idaho. And I represent the Priest River Yacht Club and a number of the citizens that live up and down the Pend Oreille reservoir. Also a number of the people in Priest River that are going to be affected by the decisions of this program.

TSAN4-1

These people are opposing the additional drawdowns of the Albeni reservoir because of the effect on property values which will affect all residents of Bonner County due to the tax revenue reductions, effects on the area of tourism and recreation business and its generated income and jobs

Responses

TSAN4-1. See Common Response No. 8.

Letter TSAN4

Comments

TSAN4-1

to the area plus the sales taxes to the State of Idaho. We feel that, unless the kokanee in the lake are protected, we are sure that this will eliminate the endangered species, the Dolly Varden. The Dolly Varden, like the salmon, are on the endangered species list and should receive the same kind of consideration as the salmon.

TSAN4-2

This fact of the reduction of the Dolly Varden can be proven by what happened at Priest Lake when Priest Lake lost the kokanee. When the kokanee disappeared in Priest Lake, the Dolly Varden -- the lake trout went out looking for something else to eat, and it was the Dolly Varden they ate because the Dolly Varden spawned in the creeks and come out and spend the great part of its time in the early time of its existence at the mouths. And these fish, the lake trout which you now have in Pend Oreille up into the 40-pound class, eat five, six, seven of them a day. So when we lose the kokanee, we can forget the endangered species of the Dolly Varden.

TSAN4-3

We also notice up and down the reservoir, itself, a great reduction in the duck population. We feel that this here reduction is due to the fact that, for the last number of years, the reservoir has been drawed down at the nesting time of the ducks. And

Responses

TSAN4-2. Dolly Varden (bull trout) have not yet been listed by the USFWS, but they have been addressed in the SOR EIS and are being given serious consideration by fishery managers.

TSAN4-3. See Common Response No. 8.

Letter TSAN4

Comments

TSAN4-3

when it is drawed down, it is a long distance from the water level to the vegetation that the ducks need to be in when they're nesting.

We do not want the resident fish of this state to be sacrificed for the salmon fishing when, in fact, the effects on the salmon are highly questionable whether or not they flush them through or not. I think that the Northwest power council found that their flushing system this year was a failure and therefore decided that the next time they'd have to try it at a different time. Trying it at a different time may or may not work. But it can definitely have an effect on all resident fish.

TSAN4-4

We favor the Sandpoint Chamber of Commerce's proposal to hold the levels up to the additional five feet. Realizing that a great many of the people attending this meeting and most other meetings are not comfortable with public speaking, I would like to ask for a show of hands for those that feel that these suggestions that I have put forward are what they consider the same kind of suggestions that they want seen. Could we have a show of hands on that?

I think that the committee here can justly see that it is a vast majority of this audience. We thank you very much for your time.

Responses

TSAN4-4. Thank you for your comment.

Letter TSAN5

Comments

TSAN5-1

people are not willing to abide by the fact that, if you keep fishing for them, they're eventually going away, then let them go away. You know, we can only protect so much. Mostly we have to protect ourselves right now because we're probably as endangered as anything.

TSAN5-2

I've been reading the papers for quite a while now on this matter and everything, and it seems to me like all our elected officials except for a few are in favor of keeping the Idaho waters in Idaho, are in favor of not having the drawdown.

TSAN5-3

I've read several different studies like the University of Idaho and the University of Washington where there's no proven fact that the drawdown or speeding those -- the frylings to the ocean has anything to do -- you know, the drawdown doesn't help that, it doesn't hurt it. There's no scientific evidence either way. We've rushed into saving a species that's taken over a hundred years to try to kill. We've rushed into it in the last three years to try to change something that took that long. I think it should be looked at for a long time before you start doing something like that.

There are too many people who have invested a lot of money in businesses, property, and whatever that in their lives and their livelihood have to mean

Responses

TSAN5-1. Thank you for your comment.

TSAN5-2. Thank you for your comment.

TSAN5-3. See Common Response No. 12.

Letter TSAN5

Comments

something to somebody. And it does. Our elected officials basically say that, too. It's really hard to believe that 10 percent of the people in this country can run 90 percent of the business. And that's about what it amounts to. We need to kind of look at what all of us need, and we need to have more people, more hearings like this, or whatever where people have the chance to get up and actually feel that they -- you know, tell what they have to say.

TSAN5-4

I don't really have much more to add on it. I think everybody has pretty much said the same things over. But my biggest thing is there's no reason to touch the summer level. That water isn't going to help anybody. Need it for just like you've been doing. There's no reason that -- I would agree with the gentleman who said the dams were built for a purpose. Let them serve those purposes. If someone wants to fish for those fish and they're not going to stop the fishing, then that's too bad. Let it die. The whooping crane they saved. It's a large fine for shooting those, it but it doesn't seem to be for fishing for salmon.

Thank you very much.

MR. MOORE: Okay. Mr. Schaudt is the next commenter and will be followed by Dick Baldwin.

Responses

TSAN5-4. Thank you for your comment.

Letter TSAN6

Comments

MR. BALDWIN: I'll pass.

MR. MOORE: Mr. Baldwin will pass. Then the next commenter will be -- I believe, it's a -- is it Fred Cobb?

MR. COBB: Fields, F-i-e-l-d-s.

MR. MOORE: Fields. Okay.

MR. SCHAUDT: I want to thank you for coming to Sandpoint tonight, and by picking a Monday night football night with the Super Bowl champions playing tonight, we don't have a very large crowd. So we all get a chance to speak if we want.

I am Bill Schaudt, I represent Lake Pend Oreille, Idaho, Club. We have made up a 15-page position paper on the proposals to adjust the water flows on Lake Pend Oreille. And rather than read all of that, I'll try to condense 15 pages down into a few major points.

Lake Pend Oreille, Idaho, Club encourages all parties to act as promptly as possible when it concerns the lake levels. According to the latest studies including the latest ones of the recent trawls by the Fish and Game, indications suggest that the kokanee are on the brink of extinction in Lake Pend Oreille. And the shore-spawning kokanee stand a chance to rebound only by keeping the lake at a higher

TSAN6-1

Responses

TSAN6-1. See Common Response No. 8.

Letter TSAN6

Comments | **Responses**

elevation in the winter months. We all, I'm sure, here understand what happens when you keep the lake level up higher in the winter to provide better spawning gravels.

Also want to make a comment on the lake level going down in the summer. We feel that there's dire results going to be forecast with even minimal water flow changes at critical fry emergence and zooplankton blooming periods. We'd like to have this all factored in. **TSAN6-1**

Another thing that happens is we end up, if we draw the water down in the summer, migration barriers can be exposed at the tributary mouths, which prevent spawning bull trout and the early running kokanee from reaching their spawning habitat. Like I said before, the nutrient and zooplankton and trainmen (phonetic) over Albeni Falls dam could damage the whole food chain. The first part of the food chain is the part that starts with zooplankton and nutrients. If we wash that strata over the dam, the whole food chain gets messed up. And we're not just losing kokanee then. We're not just losing bull trout. We're losing all the fisheries on our lake.

A couple quick conclusions that I had broken these down into two different ones, so hopefully we

Letter TSAN6

Comments

can cover this. There's been a history of the rapid extinction of kokanee fisheries in the lakes of our region. Once the population drops to a precarious level, the predator trap becomes the grim reaper. After a kokanee population crashes, there has been no successful recovery.

TSAN6-2

Where the problems are the results of the dams, the lake level management, demise of shrimp, or any combination of any or all above possibilities, one thing is abundantly clear: Something must be done now. Putting off the study and not changing the current lake level management is just not responsible management of our unique resource. We're going to study what might happen until we literally study to death our problems and consequently lose our entire fishery resource that depends on the kokanee. There have been too many examples of putting off until too late. Please don't look back in hindsight and decide that we should have acted and didn't because of the current politics and economics instead of investing in the biological future of Lake Pend Oreille right now.

TSAN6-3

Concerning the summer level, what we have is a biological conflict. Trying to save one endangered species, anadromous salmon, we kill off several fresh water resident species, including the bull trout,

Responses

TSAN6-2. The comment appears to address a proposed experimental operation of Lake Pend Oreille to benefit kokanee, which has been under active consideration by the NPPC. apart from the SOR.

TSAN6-3. Thank you for your comment.

Letter TSAN7

Comments

TSAN6-3

which is being considered to be added to the threatened or endangered species list. LPOIC doesn't claim to know all the answers, but we do know that the solution to saving the salmon shouldn't include the sacrifice of the fisheries of Lake Pend Oreille.

Thank you for your time.

MR. MOORE: Mr. Cobb is next and will be followed by a James F. -- and I believe it's Buehner, B-u-e-h-n-e-r.

MR. BUEHNER: That's correct.

MR. MOORE: And we now have four commenters remaining.

MR. COBB: I'll keep my comments rather short. I think they've all been said already. I am a retired professor in forestry and conservation. There are just a few points I'd like to make.

TSAN7-1

Number one: These environmental impact statements should be based on science. I do not like the terminology "biological opinions." I am quite concerned about having good science to back up the recommendations by the National Marine Fisheries Service, and I will be fighting to insist on that.

Furthermore, I really do want to see some statements in this final EIS about the benefits to salmon. I think that you've hit the nail on the

Responses

TSAN7-1. "Biological Opinion" is a legal term taken from the language of the Endangered Species Act. As indicated in the act, biological opinions are to be based on scientific information. The SOR agencies believe that our EIS is based on sound science.

Letter TSAN7

Comments

Responses

TSAN7-1

head. You folks have even put it together in stating that that's really not being done here. The primary purpose of the whole thing is the recovery of the salmon. And I'm not sure that we've really addressed it. I must admit that I haven't read the thick volume yet.

You mention that the option 4 is best for wildlife and recreation on Pend Oreille. I don't see any data yet on wildlife. You may have it in there and I haven't seen it yet. But I wonder how you come up with that. I live on the river in the middle of a shallow slough that is used very extensively by waterfowl. And when you pull down that summer pool, I'm sure that there will be some kind of an impact. It may not be serious, but we'd like to see that addressed.

As far as recreation is concerned, I and a few other residents of that little slough can forget about it. There's no way we're going to get anything other than our canoes out of the mouth of the slough if you pull it down 2 or 2-1/2 feet.

TSAN7-2

And, thirdly, the economic analysis based totally on the power, the cost of power, is totally inadequate. I've never seen another environmental impact statement with such a narrow focus as far as

TSAN7-2. The economic impact analysis incorporates all factors that can be quantified in economic terms and not just the cost of power.

Letter TSAN8

Comments

TSAN7-2

the economic impact is concerned. And I would strongly suggest that you work diligently to improve that.

Thank you very much.

MR. MOORE: Mr. Buehner is next and will be followed by a Todd Sudick. And we have three commenters left now.

MR. BUEHNER: James Buehner, and I'm a recent property owner here in Lake Pend Oreille. And I thank the gentlemen for showing up tonight. At least get a chance to let them know how we feel.

I'm a lakefront resident on Lake Pend Oreille in the Oden Bay area. And in talking to the neighbors, they're all concerned about what's happening with the drawdowns, proposals. In our area the shoreline is shallow. Any reduction in the lake level during the summer would render almost all the property in that area useless for summer recreation. It would be essentially personal disaster for those that own property in that area. So looking at this that way, there would be a great reduction in property values. What would happen to the tax base? What would be the cost impact of all of that? That has not been addressed.

TSAN8-1

As far as the fish go, coming from where I

Responses

TSAN8-1. See Common Response No. 8.

Letter TSAN8

Comments

TSAN8-2

did, I lived near the ocean, and I was an airline pilot. I am now retired. I used to fly over the South China Sea where the fishing boats there sweep the ocean with nets. The fish population there is down to a minimum. It is just about extinct in that area because of the overfishing. And I believe that that applies to the salmon here. No matter what you do with water flows, water rates, anything else, you fish them, they're going to disappear. And that's going to be that. The only way that the fish population, as I can see, can be restored is to stop fishing. Nets particularly are disastrous. So I think that the idea of playing with the lake level here in an experimental way is in a way fishing up a dry creek, if you will.

So I figure that there's few of us here, but I know that the people that I have talked to are very concerned, and I believe as a property owner that the drawdown to the 2,058 would be environmentally correct. And I believe that it would be good for the fish. Any drawdown during the summer months would be disastrous to the recreational business and property owners. And that's what this lake really has a lot to offer in the way of recreation. To destroy that for the sake of some salmon that are being overfished into

Responses

TSAN8-2. See Common Response No. 6.

Letter TSAN9

Comments

extinction anyway to me is shortsighted.

So I thank you very much for your time.

MR. MOORE: Next is Todd Sudick. And the final commenter that I have here is Toby McNeal.

MR. SUDICK: My name's Todd Sudick, and I am a property owner along the Pend Oreille in the Priest River area.

TSAN9-1

First thing I'd like to address is what I consider is a terrible record for the Corps of Engineers in waterways management. Deplorable at times. Most recent example of that is the Kissimmee River project in Florida. They took a river and they straightened it out and made it a ditch. And low and behold, they're going to have to spend $365 million to make it a river again. So I'm sitting here and looking at all the rhetoric coming from the government side of the thing, and I'm saying, "Well, jeez, you know, if I look back and I look at some of the waterways management history of the Corps of Engineers, I'm very skeptical of what you guys are putting forward right now." You know, you're asking us to sacrifice our lifestyle, our property values, our fishery, our tourist industry, and pay higher electrical rates. And ten years down the road, twenty years down the road, you say, "Jeez, you know, we blew

Responses

TSAN9-1. Thank you for your comment.

Letter TSAN9

Comments

that one" because there's been a number of issues -- Kissimmee River project the most notable lately. It's been a failure. It's been a total failure.

TSAN9-2

As far as the drawdown, 2-1/2 foot drawdown, 2 foot drawdown would make the waterway uninhabitable to those on the Priest River, the lower Priest. That hasn't been addressed yet. Many of the people that live along the lake that have floating docks might be able to manage it. Most of the people that have fixed docks won't be able to, but those along the lower Priest will not be able to get to their docks at all. It's too shallow.

TSAN9-3

Half of the revenue that Bonner County derives from their tax base -- half of their tax base comes from waterfront property now. Half the tax base. And 3,100 pieces of property, roughly, I think, if my memory serves me correct, provide half the tax base for Bonner County. If you drop this 2-1/2 feet, you're going to cut the property values in half. And I say half because just look at the property below the dam where the water level fluctuates in the Pend Oreille west of Newport. And it's about half of what it is on the lake where it doesn't fluctuate. So you cut the property values in half, Bonner County's going to lose 25 percent of its tax base just like that.

Responses

TSAN9-2. See Common Response No. 8. The water level in the Priest River above the backwater effect of Lake Pend Oreille would not be affected by SOS 4.

TSAN9-3. See Common Response No. 8.

Letter TSAN9

Comments | **Responses**

Now, the economic impact in services to the people of this county in roads, in all the government agencies is going to be horrendous. And that isn't factored in to your report at all. And that needs to be. That's a serious consideration. That's a glaring error, in fact, that's been left out.

Right now we're looking at some broken promises. A lot of people in this room planned their life around their investments, property being one of them, their houses being a major investment in their life. And they sit there, and they say, "Well, I've based my investment in lakefront property either as a primary residence or as a recreational piece of property on past practices of the Corps, and that's 2,062." And now you're going to pull the rug out from people, and especially lately when property values have risen and people have invested in them, you're going to pull the rug out and dump their property value in half by taking it down 2-1/2 feet. That's ridiculous. The economic impact in northern Idaho is just going to be far beyond what you can just conjure up in just a few sentences. It's going to be a major, major impact. And I think that the lack of consideration in the report, again, is without a doubt a glaring error.

TSAN9-3

Letter TSAN9 Comments

Responses

TSAN9-4

The last point I'd like to make is, if anybody's going to suffer in this thing, there should be suffering along all lines. You know, if we're going to -- if you finally end up drawing this lake down -- and God hope you don't. I don't want it -- then the Indians have got to stop fishing; the fishermen on the coast have got to stop fishing. Everybody's got to suffer. This isn't a one way street here. I get all over this country. And I read papers back east. I read -- Barron's had an article recently. And one of the things they addressed was the fishery in the West Coast. And they compared it to the fishery on the East Coast. And the Grand Banks is an example. It was overfished, and now they're out of fish. Salmon was overfished, and now they're out of fish.

MR. MOORE: Toby McNeal is next.

MR. McNEAL: You know, a lot of this has already been said, but I guess just for the record while we have the opportunity. Thank you for the opportunity.

But I'm also -- my name's Toby McNeal. I'm a property owner on Lake Pend Oreille. And like many other people here and in the county, in Kootenai County, we're all going to be affected tremendously by

TSAN9-4. See Common Response No. 6.

Letter TSAN10

Comments

any drawdown of the lake, us personally plus the habitat, waterfowl, fish, and everything in the area.

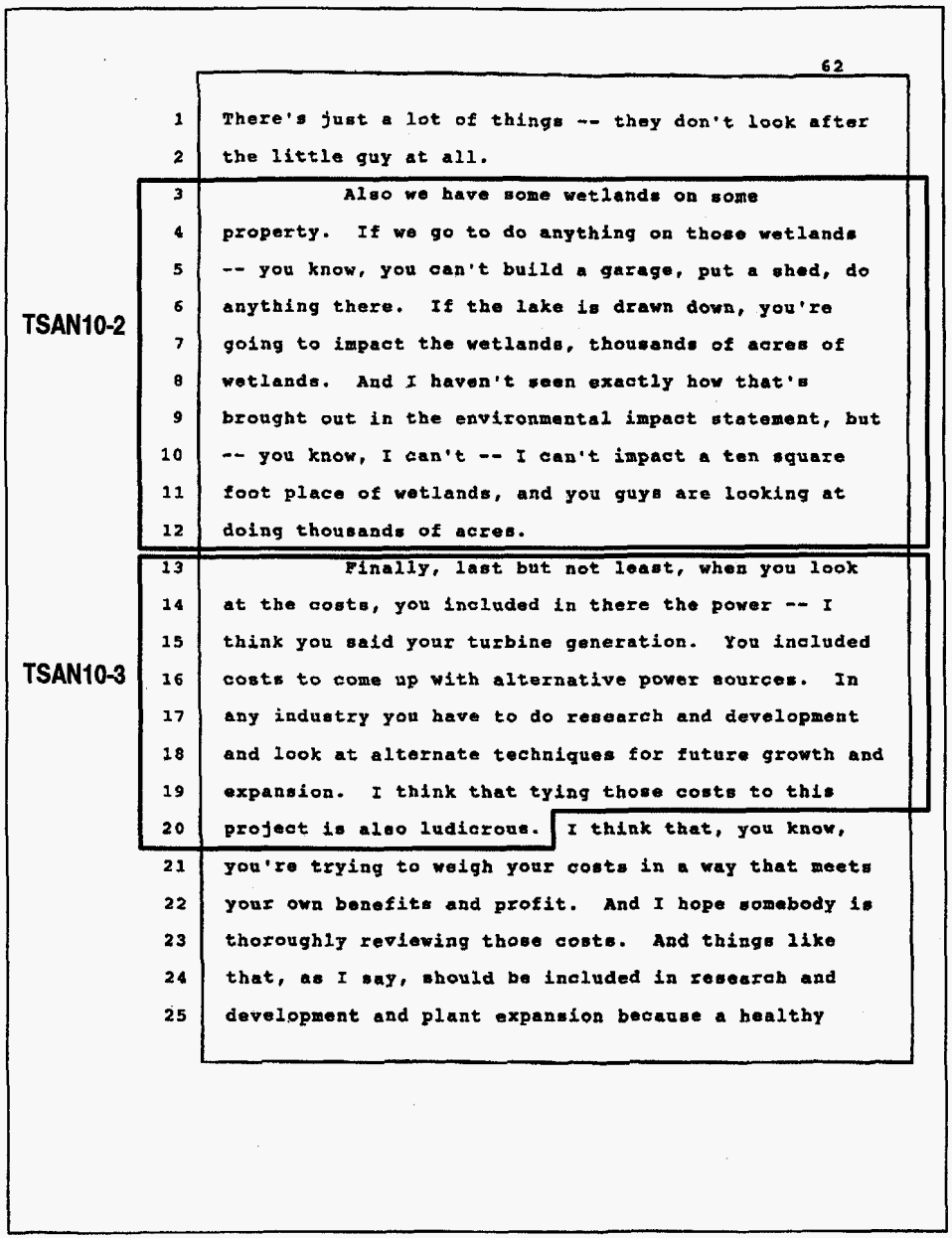
I find it somewhat ironic because this affects a lot of people. And it's a few people making the decisions. It usually ends up being that way. As one gentleman mentioned earlier, the -- our state Senators, representatives, and such in the area in general support maintaining the water level in Pend Oreille and the water rights to this region. But I find it's the power people just trying to get money -- conserve power and do other things -- but largely in the interests of money and a few big bureaucrats and big people that get the benefit.

TSAN10-1

We have a piece of property that about two inches of it is on a Corps of Engineers easement. It's from when the home was built, and that's just 20 years ago somebody put it two inches onto this Corps easement that they probably didn't even know about. We bought the property two years ago. We've been working with the Corps for two years to get an approval for that even though it's been there for 20 years. We set forth several alternatives. They said yeah, they think -- you know, they'll approve it. Shouldn't be a problem. In two years we haven't gotten one response from the Corps of Engineers.

Responses

TSAN10-1. See Common Response No. 8. The Lake Pend Oreille operation included in SOS 4 was based on wildlife habitat objectives, not power generation objectives.



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There's just a lot of things -- they don't look after the little guy at all.

TSAN10-2

Also we have some wetlands on some property. If we go to do anything on those wetlands -- you know, you can't build a garage, put a shed, do anything there. If the lake is drawn down, you're going to impact the wetlands, thousands of acres of wetlands. And I haven't seen exactly how that's brought out in the environmental impact statement, but -- you know, I can't -- I can't impact a ten square foot place of wetlands, and you guys are looking at doing thousands of acres.

TSAN10-3

Finally, last but not least, when you look at the costs, you included in there the power -- I think you said your turbine generation. You included costs to come up with alternative power sources. In any industry you have to do research and development and look at alternate techniques for future growth and expansion. I think that tying those costs to this project is also ludicrous. I think that, you know, you're trying to weigh your costs in a way that meets your own benefits and profit. And I hope somebody is thoroughly reviewing those costs. And things like that, as I say, should be included in research and development and plant expansion because a healthy

TSAN10-2. See Common Response No. 8.

TSAN10-3. The methods used to conduct the power impact analysis are described in the SOR Main Report and in Appendix I. Power values used in the analysis are based on the cost of replacement power, which could come from gas–fired plants and/or through purchases on the open market, and not on the costs of alternative energy technologies not currently in commercial use.

COPY

"PUBLIC MEETING ON THE COLUMBIA RIVER SYSTEM OPERATION REVIEW (SOR) DRAFT EIS"

TRANSCRIPT OF PROCEEDINGS

Cavanaugh's Inn, Ballroom B
Kalispell, Montana
Tuesday, September 20, 1994 -- 7:00 p.m.

I N D E X

Letter TKAL1

Comments

case we can move to the formal testimony portion of our meeting. We have a total of seven individuals who have signed up to give formal testimony. Are there any of those who arrived after the meeting started who would also like to provide some formal testimony? I would recommend then that we allow -- if this is agreeable to all you who want to give testimony -- five minutes for each person. And what we'll do is I'll be seated here; when your five minutes is up and you see me come up to the podium, that will be your indication that the time is up. And I would just ask that you close your statement, you know, appropriately as soon as possible after that. Our first person who is signed up for formal testimony -- And when you come up to the microphone here in the aisle, please for the record since we do have a court reporter, state your name and your affiliation. Our first person who signed up is a John Hossack. I hope I said your name correctly. And Mr. Hossack will be followed by Elna Darrow.

MR. HOSSACK: My name is John Hossack. I'm a director of Lincoln Electric Co-op in Eureka, Montana.

TKAL1-1 The most obvious deficiencies in the Draft Environmental Impact Statement is the failure to

Responses

TKAL1-1. Sections 4.2.16 and 4.2.17 of the Draft EIS addressed the regional economic impacts and the social impacts, respectively, that might occur under the respective SOSs. This material included information about specific subregions and focus communities in the study area. Appendix O, Economic and Social Impacts, provided extensive additional detail on this analysis.

Letter TKAL1

Comments

recognize and evaluate the social and economic impacts on areas with a small population. The impact on each of these alternatives on areas with large populations is certainly less damaging than it would be on a small community. Small communities such as Eureka and Rexford up on Lake Koocanusa could be devastated by decreasing the resident fisheries potential, increasing the site exposure fostering unacceptable air pollution and excessive drawdowns that adversely effect recreation. The cost of electricity is important, but the welfare of our communities and rural residents are of equal importance.

TKAL1-1

The adverse effects of each alternative on resident fisheries deserves equal consideration with threatened or endangered species. If the proposed action has the potential to create an endangered species from the resident fisheries then that alternative should be discarded as impractical. To allow one species of fish to become endangered while trying to recover a different species will result in the National Marine Fisheries Service becoming a self-perpetuating government agency. This could very easily occur on the Kootenai River and on Lake Koocanusa.

TKAL1-2

It is obvious that SOS 4 is the preferred

TKAL1-3

Responses

TKAL1-2. The EIS recognizes and discusses the potential tradeoffs concerning different endangered or declining species. The SOS preferred alternative attempts to improve conditions for both salmon and the Kootenai River white sturgeon, and also incorporates summer draft limits to help protect resident fish in general.

TKAL1-3. Thank you for your comment.

Letter TKAL1

Comments

alternative from our perspective. Survival rates appear to be within acceptable limits and, with transport, the juvenile survival rate is high. The resident fish and wildlife values in northwest Montana are protected or enhanced. Air quality is maintained. Above all, the social and economic stability of our rural communities and residents is given proper consideration.

TKAL1-3

The National Marine Fisheries has become one of the most powerful bureaucracies in the United States. It has dictatorial power over all natural resource-dependent businesses and agencies. I hope that effected rate payers will petition their congressman to support changes in the Endangered Species Act that will create a more level playing field for people and wildlife. There is an opportunity to co-exist. And I'm sure without the involvement of our Governor this past year both Hungry Horse and Koocanusa Reservoirs would be severely stressed. Thank you for this opportunity to be heard.

TKAL1-4

MR. MOORE: Our next commentor is Elna Darrow and she will be followed by a Ti -- and I'm not sure how to say this -- Dahlseide.

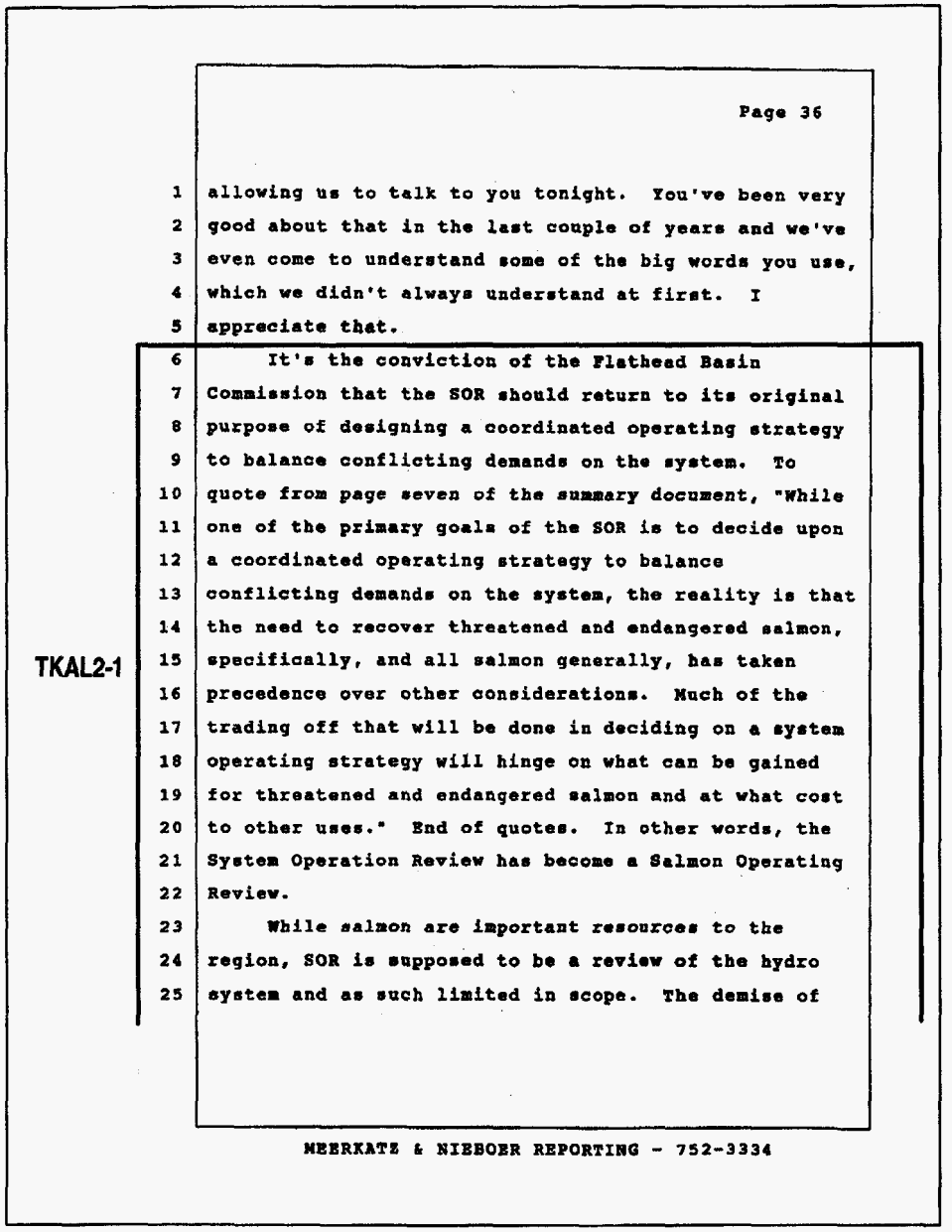
MS. DARROW: Thanks for being here and

Responses

TKAL1-4. Thank you for your comment.

Letter TKAL2

Comments



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allowing us to talk to you tonight. You've been very good about that in the last couple of years and we've even come to understand some of the big words you use, which we didn't always understand at first. I appreciate that.

It's the conviction of the Flathead Basin Commission that the SOR should return to its original purpose of designing a coordinated operating strategy to balance conflicting demands on the system. To quote from page seven of the summary document, "While one of the primary goals of the SOR is to decide upon a coordinated operating strategy to balance conflicting demands on the system, the reality is that the need to recover threatened and endangered salmon, specifically, and all salmon generally, has taken precedence over other considerations. Much of the trading off that will be done in deciding on a system operating strategy will hinge on what can be gained for threatened and endangered salmon and at what cost to other uses." End of quotes. In other words, the System Operation Review has become a Salmon Operating Review.

While salmon are important resources to the region, SOR is supposed to be a review of the hydro system and as such limited in scope. The demise of

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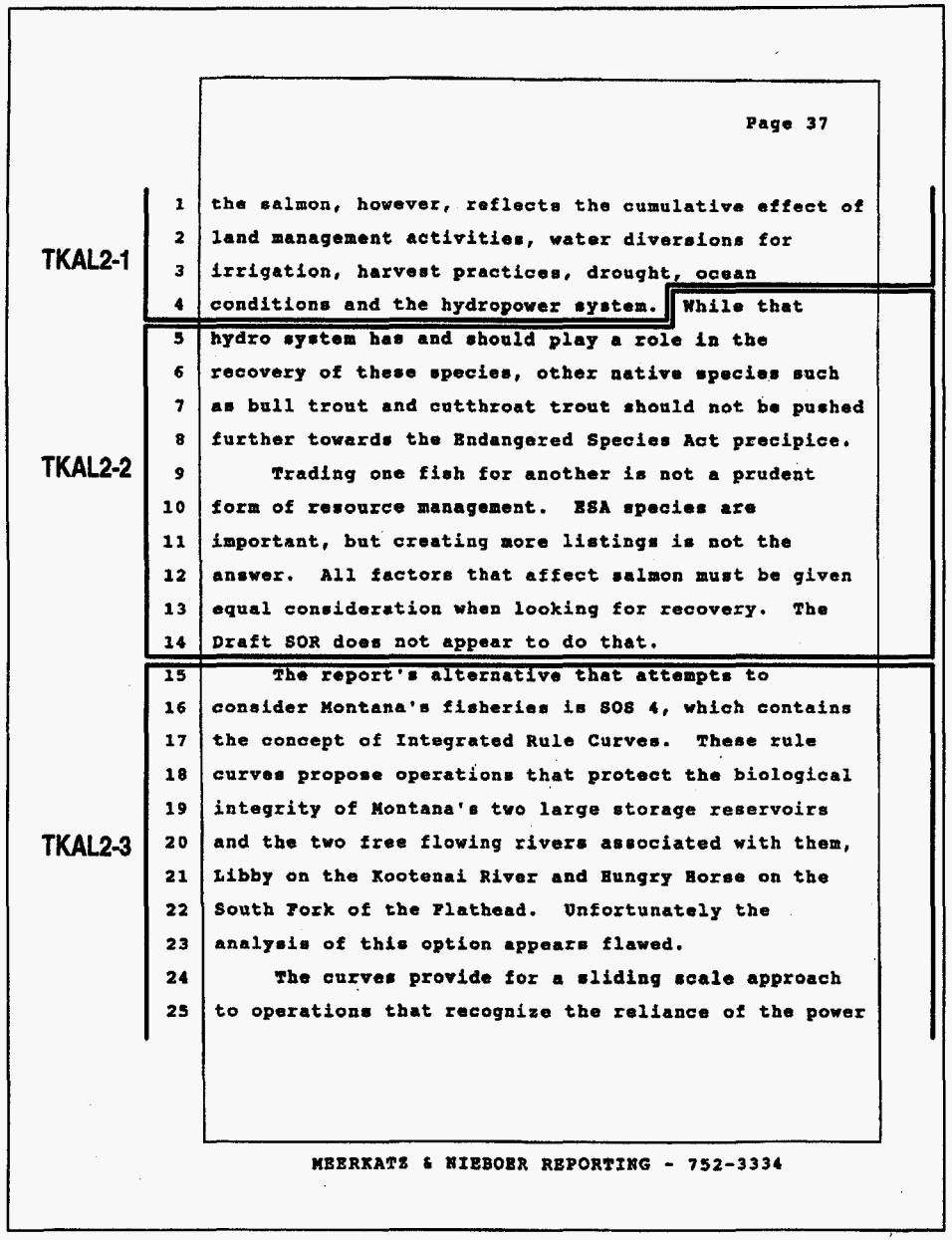
TKAL2-1

Responses

TKAL2-1. See Common Response Nos. 2 and 6, and Response TSEA1-1.

Letter TKAL2

Comments



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TKAL2-1

the salmon, however, reflects the cumulative effect of land management activities, water diversions for irrigation, harvest practices, drought, ocean conditions and the hydropower system. While that hydro system has and should play a role in the recovery of these species, other native species such as bull trout and cutthroat trout should not be pushed further towards the Endangered Species Act precipice.

TKAL2-2

Trading one fish for another is not a prudent form of resource management. ESA species are important, but creating more listings is not the answer. All factors that affect salmon must be given equal consideration when looking for recovery. The Draft SOR does not appear to do that.

TKAL2-3

The report's alternative that attempts to consider Montana's fisheries is SOS 4, which contains the concept of Integrated Rule Curves. These rule curves propose operations that protect the biological integrity of Montana's two large storage reservoirs and the two free flowing rivers associated with them, Libby on the Kootenai River and Hungry Horse on the South Fork of the Flathead. Unfortunately the analysis of this option appears flawed.

The curves provide for a sliding scale approach to operations that recognize the reliance of the power

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Responses

TKAL2-2. See Common Response No. 6 and Response TKAL1-2.

TKAL2-3. See Common Response No. 9.

Letter TKAL2 Comments

system and flood control on these large storage projects. This approach allows for flood drafts in wet years and allows for deeper and deeper power drafts in successive drought years like we've just had and are still having. But both are done within limits that protect the biology of the rivers and reservoirs. The IRC's even result in increased flows for salmon in some years. The SOR analysis does not reflect this sliding scale approach. As a result, the impacts of using IRC's are over-stated in the analysis.

TKAL2-3

Over the course of the SOR process IRC's have evolved and now have even less impact on the power system. During that same time the bull trout has come closer to being listed as a threatened or endangered species. The next iteration of the SOR must include refined analysis of measures that protect Montana's native fish and wildlife species. It should reflect increased input in the technical modeling from the anadromous as well as the resident fish task forces, to build consensus on benefits and negative impacts to both kinds of fish.

We believe that some attempts must be made to balance the costs and benefits to the various states in the basin. It appears that Montana gains

TKAL2-4

TKAL2-4. The SOR agencies do not believe that there would be a disportionate distribution of costs and benefits within the region. The SOSs generally consider larger flow augmentation volumes from Idaho and Montana, and could produce significant adverse impacts in Oregon and Washington as well. Appendix O of the Final EIS addresses this issue of interstate equity. See also Common Response No. 10.

Letter TKAL2

Comments

TKAL2-4

relatively little from the operations of the hydro system in the Columbia, while now being asked to bear the brunt of changes in the system to benefit the economies of other states. Montana's local and visitor recreation industry can expect extremely low water levels in more than just drought years if one of these alternatives that sacrifice everything else to salmon turns out to be your preferred alternative. I am interested in hearing that you may do a preferred alternative and I would urge you to keep that on the table as you continue your deliberations.

TKAL2-5

Further, that preferred alternative must be presented with full opportunities for public comment with a realistic hope that it can be objected to and changed. The public must continue to be an important part of the SOR process. The genuine intent that the public will have an impact on the final product is an essential part of what makes the public willing to spend volunteer time cooperating with the agencies who are doing most of the work. The tremendous amount of resources expended on developing a coordinated hydro system on the Columbia River must not be compromised, but most of all, let the System Operation Review stop being a Salmon Operation Review.

MR. MOORE: Thank you. Next commentor

Responses

TKAL2-5. See Common Response No. 1.

Letter TKAL3

Comments

process of reviewing and preparing written comment on technical appendices to the document that are of interest to their individual agencies. These written comments will be coordinated and submitted on behalf of Governor Mark Racicot and the State of Montana.

Preliminary discussion among the state agencies has yielded a number of concerns. Among those concerns is the change in the focus of the System Operation Review from its original intent of providing a well-balanced ecosystem plan of operation for the Columbia River System to yet another narrowly-based and speculative recovery plan for threatened and endangered salmon. And I was going to quote the same quote Elna did so I won't read it for you again. TKAL3-1

While the hydro system should appropriately play a role in the recovery of the ESA listed species, of equal importance is preventing the listing of other native species such as bull trout, recently determined by the US Fish and Wildlife Service to be biologically warranted but precluded from listing at this time, and cutthroat trout, a species of special concern. Recovery measures can't be effective if they're pursued in isolation pitting one species against another. TKAL3-2

In addition, there is a lack of sound science TKAL3-3

Responses

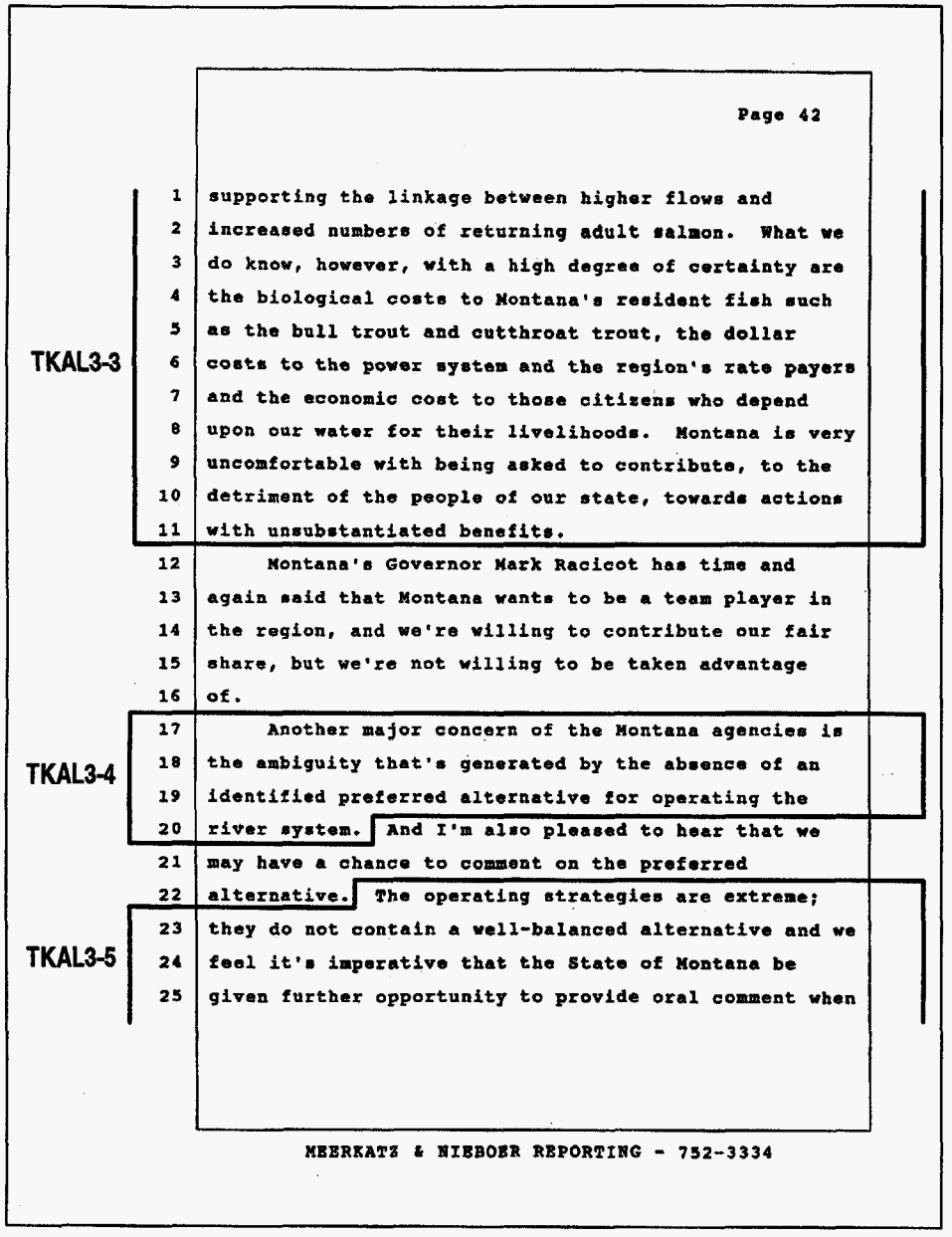
TKAL3-1. See Response TKAL2–1.

TKAL3-2. See Response TKAL1–2.

TKAL3-3. See Common Response No. 12.

Letter TKAL3

Comments



supporting the linkage between higher flows and increased numbers of returning adult salmon. What we do know, however, with a high degree of certainty are the biological costs to Montana's resident fish such as the bull trout and cutthroat trout, the dollar costs to the power system and the region's rate payers and the economic cost to those citizens who depend upon our water for their livelihoods. Montana is very uncomfortable with being asked to contribute, to the detriment of the people of our state, towards actions with unsubstantiated benefits.

TKAL3-3

Montana's Governor Mark Racicot has time and again said that Montana wants to be a team player in the region, and we're willing to contribute our fair share, but we're not willing to be taken advantage of.

Another major concern of the Montana agencies is the ambiguity that's generated by the absence of an identified preferred alternative for operating the river system. And I'm also pleased to hear that we may have a chance to comment on the preferred alternative. The operating strategies are extreme; they do not contain a well-balanced alternative and we feel it's imperative that the State of Montana be given further opportunity to provide oral comment when

TKAL3-4

TKAL3-5

Responses

TKAL3-4. See Common Response No. 1.

TKAL3-5. See Common Response Nos. 1 and 2.

Letter TKAL3 Comments Responses

TKAL3-5

an operating strategy has been identified and before a record of decision is entered into the federal register.

Montana urges the federal agencies involved with the SOR to remain on course and seek a reasonable balance in the river operations. Thank you.

MR. MOORE: Thank you. Our next commentor is Dale Williams, and he will be followed by a Brian Marotz. And we have four commentors left.

MR. WILLIAMS: Thank you. I was unable to time this before I came in this evening having taken this hot off the press, so I'm sure I'm a little over five minutes. By way of reintroduction, my name is Dale Williams. I have the distinct honor to represent two organizations this evening. The first is the National Organization to Save Flathead Lake of which I serve as Vice-Chairman. It was born out of the frustration created by the Federal Energy Regulatory Commission's efforts in their draft EA in which a preferred alternative to Kerr Dam operations was put forth which called for total disregard to the historical levels of Flathead Lake which have been maintained for the past 55 years. In that alternative there were suggestions of a new lake regime calling for an ealier full pool, a drastic early reduction in

Letter TKAL4

Comments

TKAL4-1

the fall toward earlier winter levels and a redefining of our full pool level by a reduction of one foot fmsl. Let me be very candid with you. On behalf of the board of directors, the membership, the nearly six thousand petition signers opposed to such a regimen, that any attempt to disrupt the operations of Hungry Horse Dam which would have a negative impact, an impact that would inadvertently redefine the lake level or the cycles of full pool and winter drawdown from our current operation at Kerr Dam, will have immediate and profound opposition. In other words, we want Flathead Lake left alone.

Secondly, I represent on a broader basis Montanans for Multiple Use, an organization made up of over 25 hundred multiple users from across western Montana, an organization well-known in this area for its advocacy of a common sense approach to the wise use and conservation of our natural resources. On behalf of that group the following remarks are made. There were in this morning's Missoulian seven scenarios drawn as possible operational plans for both Hungry Horse and Libby Dams.

Let me say from the outset that Montanans want to be good neighbors. It is in our tradition to share our water resource with the good people of the Pacific

Responses

TKAL4-1. See Common Response No. 13.

Letter TKAL4

Comments

Northwest and we have done so. But any scenario of operating Hungry Horse and Libby Dams will have to have the welfare of Montanans as the first priority. With that in mind we can eliminate from consideration two of the seven scenarios. Providing higher flows for endangered fisheries and the combination of operations and flows to benefit salmon and other sea-going fish. There remains not one shred of evidence to support the theory that flushing our reservoirs will enhance salmon production or other endangered fisheries. In fact, just the opposite affect was chronicled in the Oregonian during July of '94, wherein they stated that the salmon were infinitely harmed by the flushing because of oxygenation, a disease noted and found in many salmon this year attributed to the flushing of our dam systems. That along with the fact as pointed out by Governor Racicot earlier this year that many of the simplest procedures that could be done to save frye which are not being done even though it is budgeted, or that limits of salmon still have not been addressed in discussions with other fishing nations, leave little to no support for these two scenarios.

Let me also say that the historical purpose and objectives of these two dam operations must also be

TKAL4-2

Responses

TKAL4-2. See Common Response No. 12.

considered in any scenario. To that end I have four quotes, that I will not read because of time, from Secretary of the Interior William Warne when Hungry Horse Dam was breaking ground July 10 of '48; quotations from President Truman when the dam was dedicated Hungry Horse in about 1952; a summation of quotation from President Ford at the dedication of Libby Dam and of Montana's Governor Judge.

TKAL4-3

With this pact that we have with the federal government still the primary consideration, we can eliminate two more of the suggested scenarios, operating dams to return to pre-dam flows and the drafting of reservoirs to fixed elevations. Neither of these two scenarios continue to provide for the historical objectives of dam operations. While a fixed elevation low might be of real necessity born out of the current drought and the condition of both Hungry Horse and Libby Dam reservoirs, drafting as a means to attain those elevation lows is not the answer.

While keeping reservoirs as full as long as possible for resident fish and other uses may have its merits, as I stated earlier, Montanans want to be good neighbors. We do not want to be so centralized in our thinking that we lose sight of the historical

TKAL4-3. Thank you for your comment.

Letter TKAL4

Comments

objectives nor our responsibility as good neighbors to share our resource. Thus this alternative is not the answer.

That leaves us with two alternatives. One is to simply continue the present operations with no new actions. This alternative cannot be the answer. Current conditions will not favor this alternative. We cannot afford the flushing that has already taken place for downstream salmon at the cost of power, recreational opportunity and our economy. Two weeks ago Hungry Horse was at 59 feet below full pool; one week ago 61 feet below full pool; this week we are nearly 63 feet below full pool with an expected 200 feet below full elevation expected before the season is done. To continue dam operations as they have been done this year would continue to be in opposition to priorities established not only by our local standards, but by national recognition of those standards more than 50 years ago.

TKAL4-4

That leaves one scenario remaining, a return to the way Hungry Horse was successfully operated for more than a quarter of a century, a return to an operation that did not mandate water for endangered fish based on little if any credible scientific evidence, an operation before the Northwest Power Act

TKAL4-5

Responses

TKAL4-4. Thank you for your comment.

TKAL4-5. Thank you for your comment.

Letter TKAL5

Comments

of 1980, which has since its inception been used as a vehicle, an instrument to steal our water resource, not in recognition of the pact we made with the federal government, but based on other priorities being used as an excuse to override Montana's interest.

TKAL4-5

It is void of any common sense or practicality to operate Hungry Horse and Libby Dams in the manner they have been and are currently operating. They were intended for and federally mandated for flood control first, creation of power second and recreational and tourist benefits to the local economies. To this end I and 25 hundred citizens of Montanans for Multiple Use pledge our support. Thank you.

MR. MOORE: Thank you. Next is Brian Marotz, and you will be followed by Bill Chapman.

MR. MAROTZ: Yes, I'm Brian Marotz and I represent Montana Fish, Wildlife & Parks. We have been intimately involved with the SOR process from the beginning. In fact, we were consulted to develop a screening model before the work groups were actually put together at the onset. Since that time as a member of the Resident Fish Committee we've worked with the other states and tribes in the Resident Fish Committee to develop SOS Number Four, and that's of

TKAL5-1

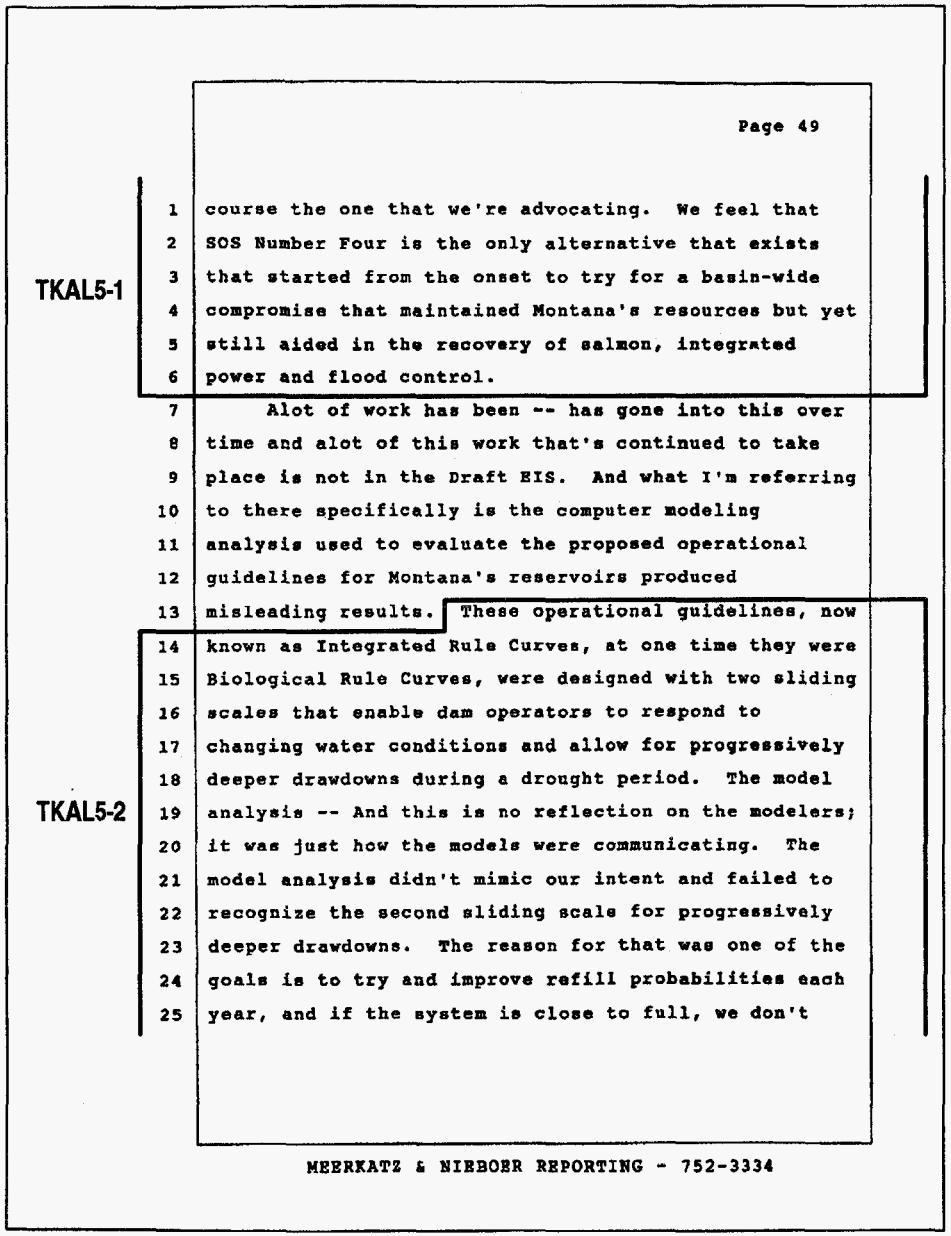
Responses

TKAL5-1. Thank you for your comment.

Letter TKAL5

Comments

Responses



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course the one that we're advocating. We feel that SOS Number Four is the only alternative that exists that started from the onset to try for a basin-wide compromise that maintained Montana's resources but yet still aided in the recovery of salmon, integrated power and flood control.

TKAL5-1

Alot of work has been -- has gone into this over time and alot of this work that's continued to take place is not in the Draft EIS. And what I'm referring to there specifically is the computer modeling analysis used to evaluate the proposed operational guidelines for Montana's reservoirs produced misleading results. These operational guidelines, now known as Integrated Rule Curves, at one time they were Biological Rule Curves, were designed with two sliding scales that enable dam operators to respond to changing water conditions and allow for progressively deeper drawdowns during a drought period. The model analysis -- And this is no reflection on the modelers; it was just how the models were communicating. The model analysis didn't mimic our intent and failed to recognize the second sliding scale for progressively deeper drawdowns. The reason for that was one of the goals is to try and improve refill probabilities each year, and if the system is close to full, we don't

TKAL5-2

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TKAL5-2. See Common Response No. 9.

select a critical period beyond number one, or critical period one through four. And so the lowest curves that we submitted at the time were never invoked and it kept the reservoirs fuller than we actually intended during a drought period.

Well, that resulted in an overestimate of the impacts to firm power. And the costs associated with the implementation of the Integrated Rule Curves were likewise overstated. Now, these inflated power impacts and related costs have sparked an emotional response from the power industry, and in my opinion biased the decision process. More recent analyses which were not included in the Draft EIS have shown that the true cost is quite a bit less.

TKAL5-2

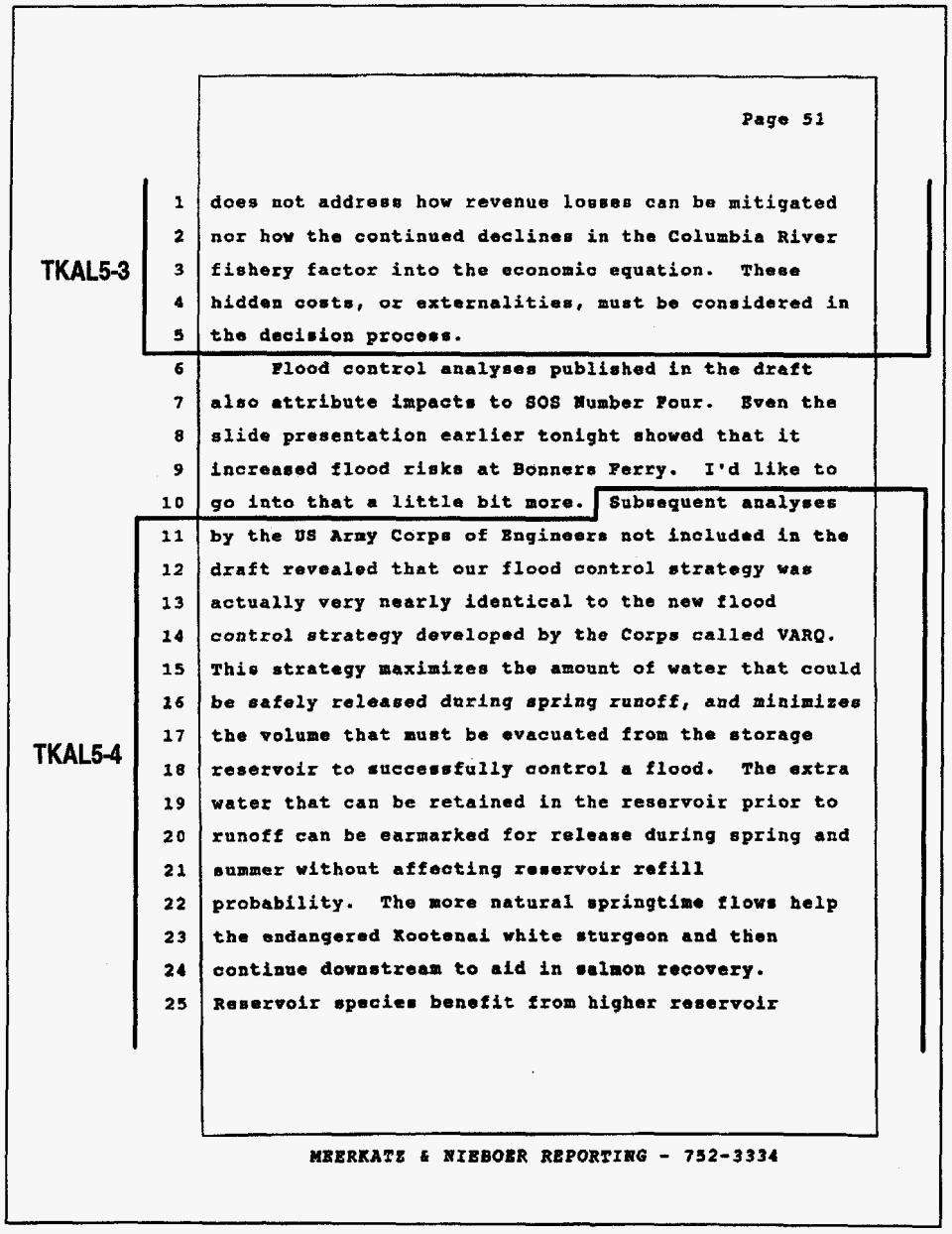
There's no question that operational changes to protect or recover the fisheries resource can carry substantial costs in terms of firm power generation. We recognized this dilemma at the onset and made provisions to reduce power impacts. First we designed flexible operational guidelines to integrate the needs of power and fish. Next we asked for interregional energy transfers and innovative power marketing strategies, which are commonly used to improve the economic picture. Unfortunately, the most recent work is not included in the Draft EIS. And the Draft EIS

TKAL5-3

TKAL5-3. See Common Response No. 9.

Letter TKAL5 Comments

Responses



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TKAL5-3

does not address how revenue losses can be mitigated nor how the continued declines in the Columbia River fishery factor into the economic equation. These hidden costs, or externalities, must be considered in the decision process.

Flood control analyses published in the draft also attribute impacts to SOS Number Four. Even the slide presentation earlier tonight showed that it increased flood risks at Bonners Ferry. I'd like to go into that a little bit more.

TKAL5-4

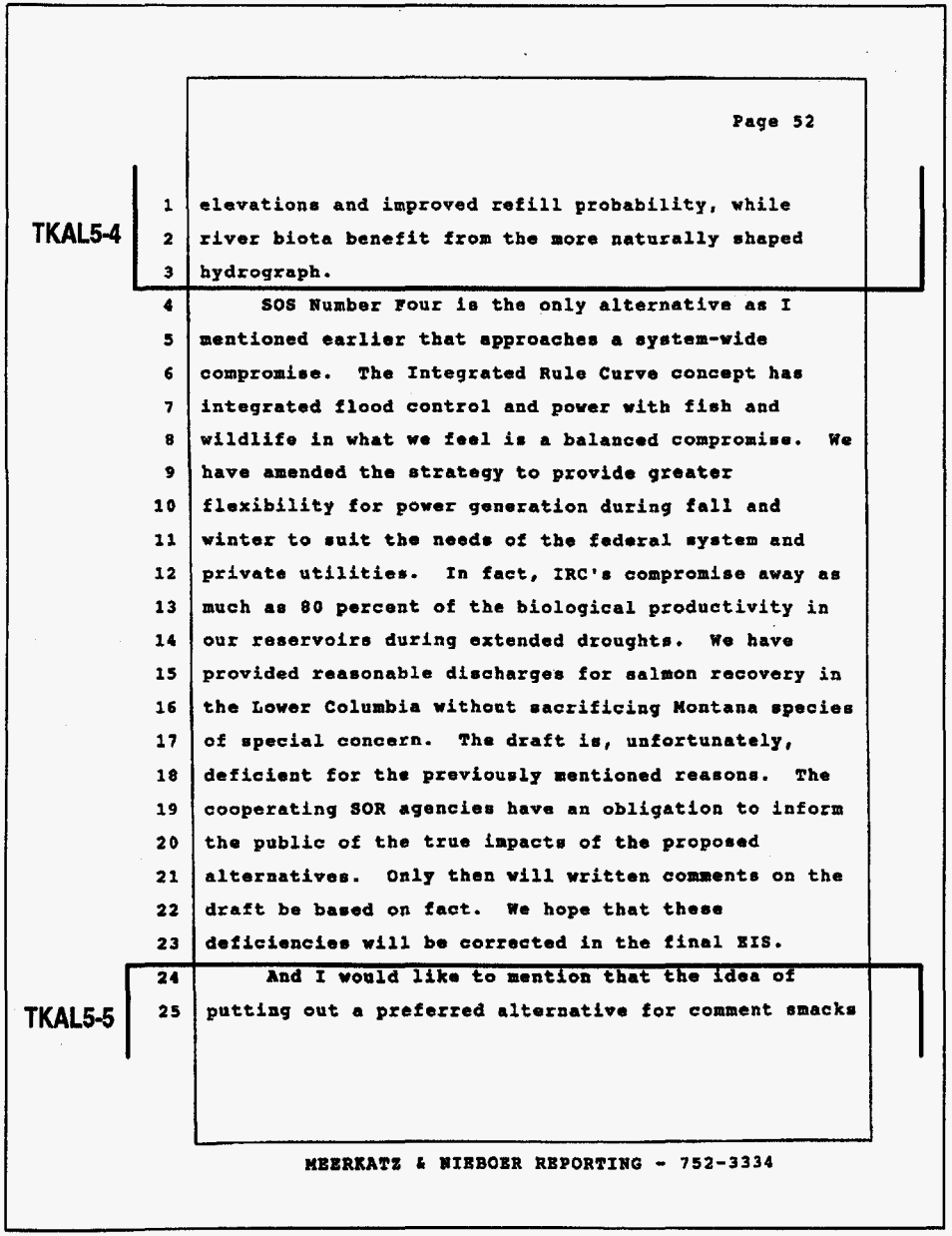
Subsequent analyses by the US Army Corps of Engineers not included in the draft revealed that our flood control strategy was actually very nearly identical to the new flood control strategy developed by the Corps called VARQ. This strategy maximizes the amount of water that could be safely released during spring runoff, and minimizes the volume that must be evacuated from the storage reservoir to successfully control a flood. The extra water that can be retained in the reservoir prior to runoff can be earmarked for release during spring and summer without affecting reservoir refill probability. The more natural springtime flows help the endangered Kootenai white sturgeon and then continue downstream to aid in salmon recovery. Reservoir species benefit from higher reservoir

MEERKATZ & NIEBOER REPORTING - 752-3334

TKAL5-4. See Common Response No. 9.

Letter TKAL5

Comments



TKAL5-4

elevations and improved refill probability, while river biota benefit from the more naturally shaped hydrograph.

SOS Number Four is the only alternative as I mentioned earlier that approaches a system-wide compromise. The Integrated Rule Curve concept has integrated flood control and power with fish and wildlife in what we feel is a balanced compromise. We have amended the strategy to provide greater flexibility for power generation during fall and winter to suit the needs of the federal system and private utilities. In fact, IRC's compromise away as much as 80 percent of the biological productivity in our reservoirs during extended droughts. We have provided reasonable discharges for salmon recovery in the Lower Columbia without sacrificing Montana species of special concern. The draft is, unfortunately, deficient for the previously mentioned reasons. The cooperating SOR agencies have an obligation to inform the public of the true impacts of the proposed alternatives. Only then will written comments on the draft be based on fact. We hope that these deficiencies will be corrected in the final EIS.

TKAL5-5

And I would like to mention that the idea of putting out a preferred alternative for comment smacks

Responses

TKAL5-5. See Common Response No. 1.

Letter TKAL5 Comments Responses

TKAL5-5

well with us as well.

And just a few notes I had. On the tape we mentioned Bonners Ferry, increased flood concerns there. The most recent analyses show that, yes, if you plotted the stage of the Kootenai River and drew a line across at flood stage, we do indeed double the flood risk at Bonners Ferry. But the largest deviation was about two feet and so that's not a significant hit, although statistically it is a hit. So what I'm saying is even though these curves based on status quo flood control curves do increase the flood risk, it's by a very small amount and I think it's something that could be lived with.

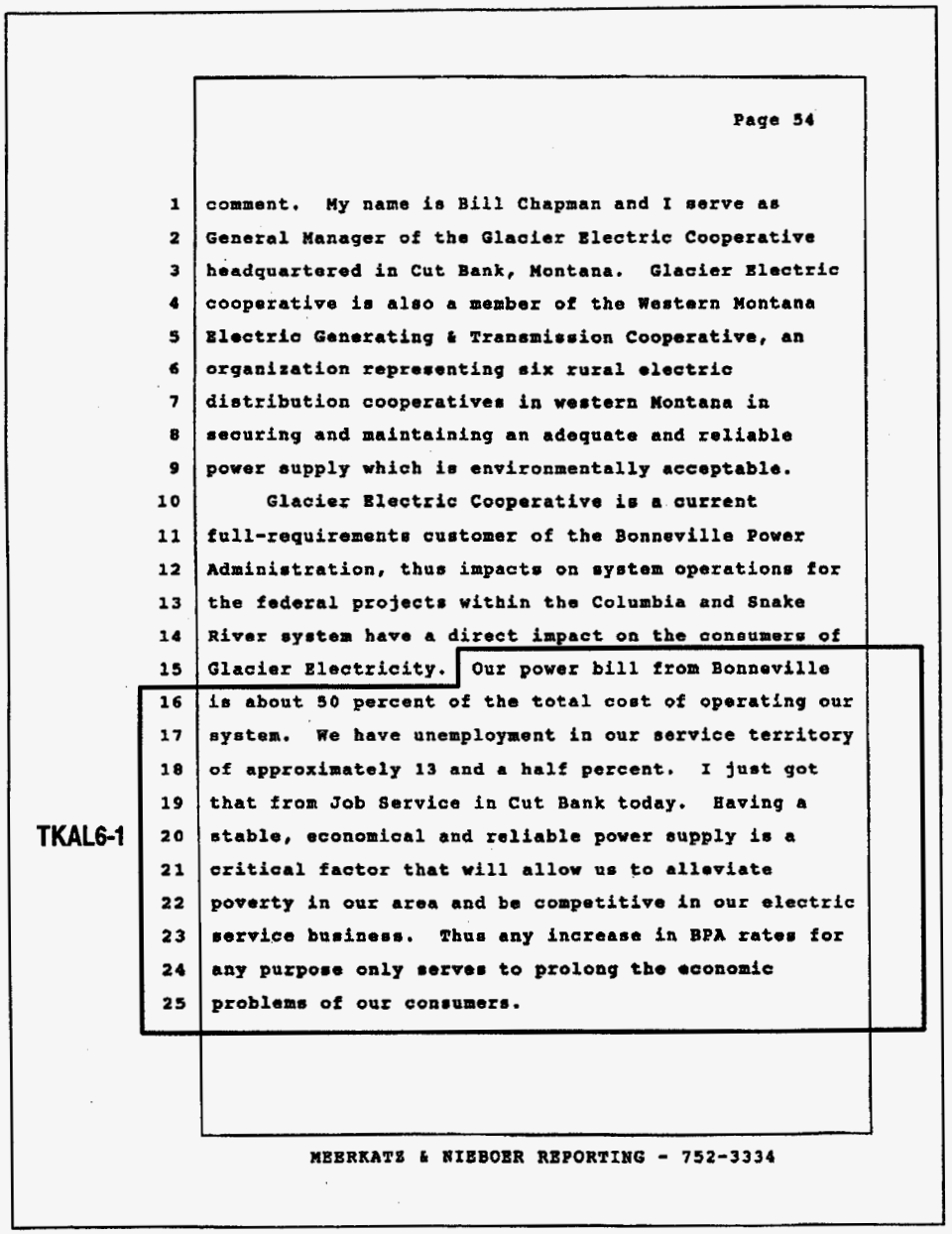
Gas saturation in the lower river is something that can be dealt with in other ways, and recreation at Coulee I think reflects the shift of status quo flood control from headwaters down the Grand Coulee. And I think if we look at VARQ operations we will have less impact on recreation at the lower rivers as well. Thanks.

MR. MOORE: Thank you. The next is Bill Chapman, and then our final commentor will be a Mr. Warren McConkey.

MR. CHAPMAN: Good evening and thank you for allowing us this opportunity to provide

Letter TKAL6

Comments



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comment. My name is Bill Chapman and I serve as General Manager of the Glacier Electric Cooperative headquartered in Cut Bank, Montana. Glacier Electric cooperative is also a member of the Western Montana Electric Generating & Transmission Cooperative, an organization representing six rural electric distribution cooperatives in western Montana in securing and maintaining an adequate and reliable power supply which is environmentally acceptable.

Glacier Electric Cooperative is a current full-requirements customer of the Bonneville Power Administration, thus impacts on system operations for the federal projects within the Columbia and Snake River system have a direct impact on the consumers of Glacier Electricity. Our power bill from Bonneville is about 50 percent of the total cost of operating our system. We have unemployment in our service territory of approximately 13 and a half percent. I just got that from Job Service in Cut Bank today. Having a stable, economical and reliable power supply is a critical factor that will allow us to alleviate poverty in our area and be competitive in our electric service business. Thus any increase in BPA rates for any purpose only serves to prolong the economic problems of our consumers.

TKAL6-1

MEERKATS & NIEBOER REPORTING - 752-3334

Responses

TKAL6-1. The EIS recognizes the importance of a stable, reliable, and economical power supply, and addresses the potential for effects on power supplies and rates.

Letter TKAL6

Comments

TKAL6-2

The seven alternative operating strategies contained in the Draft SOR do not sufficiently provide for salmon enhancement and for other needs of the river system, such as resident fish, wildlife, power, flood control, navigation, irrigation, recreation and water quality. The Columbia River Alliance proposed strategy called Recover 1 maintains a multi-use, working river which maximizes salmon benefits. I support Recover 1 and urge that it be considered over the other SOR options. In particular I want to

TKAL6-3

emphasize these elements of Recover 1.

Improvements to smolt transportation. It has already been proven that barging of juvenile salmon is successful. Improving upon and enhancing the effectiveness of a barging program can only assure greater results.

The design and installation of surface collectors is proposed, to work in conjunction with the juvenile salmon transportation program.

The third point, elimination of high-level flow regimes, utilizing moderate flows and only where flow benefits directly enhance the effectiveness of the juvenile salmon transportation program. NMFS' recent decisions to allow greater drawdowns and higher flows only resulted in more dead fish and less benefits to

Responses

TKAL6-2. See Common Response No. 2.

TKAL6-3. Thank you for your comment. See Common Response Nos. 4 and 11.

Letter TKAL7

Comments

to make that I picked up out of your film -- or your slide presentation is the reality that we have changed the environmental balance in the northwest. We don't have a natural system in 1994. And the operation of this Columbia River system has got to take into account the fact that we have six plus million people living in the northwest; that we have other environmental laws that have changed the way that we protect predators, whether they be seals or sea lions or whatever, and I think there is a real danger in the Draft EIS as it's currently presented that it is in fact a salmon recovery plan, or a salmon protection plan. There's certainly more to the northwest than just salmon. They're an important part of our environment, yes, they are, but they're not the only part. And I would certainly encourage you to adopt an alternative strategy.

TKAL7-1

And the Recover 1 strategy that you're going to be hearing about at almost everyone of these meetings proposed by the Columbia River Alliance I think is that balanced approach that looks at cost-effective management of the Columbia River system. I think a big part of that does go back to pre-1980 days. Alot of these unscientific decisions that have been made recently, especially in the last year or so, such as

TKAL7-2

Responses

TKAL7-1. Thank you for your comment.

TKAL7-2. See Common Response No. 11.

Letter TKAL8/9

Comments

gentleman.

MR. MOY: Rich Moy with the Montana Department of Natural Resources and Conservation. One of the things you need to know is that the Bonneville Power Administration Reclamation Corps has alot of jurisdiction. But one thing they do not have jurisdiction over is Flathead Lake and Kerr Dam. That is clearly the jurisdiction of the Federal Regulatory Commission. Those are separate entities and separate processes completely.

TKAL8-1

MR. MOORE: Thank you for your comment.

MR. CLARK: Sir, I understand that. But maybe -- And I apologize if I misunderstood the statement that was made. But I mean, again, I apologize, but I understood that statement to say that the Basin Commission had asked that they be tied in with this. And if I misunderstood that, I apologize. But it is a concern in the Flathead that somebody is after the water in Flathead Lake.

TKAL9-1

MR. MOORE: Thank you. Other questions? Yes, sir?

MR. McCONKEY: Warren McConkey with Flathead Electric Co-op. I guess a question, and I'll raise it later when I make some testimony, but a fairly conspicuous absence of any discussions

Responses

TKAL8-1. Thank you for pointing this out to the audience. This point is also made in Common Response No. 13.

TKAL9-1. See Common Response No. 13.

COLUMBIA RIVER SOR DRAFT EIS PUBLIC MEETING

LIBBY, MONTANA

ASA WOOD SCHOOL

WEDNESDAY, SEPTEMBER 21, 1994- 7:00 P. M.

MR. WITT ANDERSON
U. S. ARMY CORPS OF ENGINEERS

MR. PHIL THOR
BONNEVILLE POWER ADMINISTRATION

MR. JOHN DOOLEY
BUREAU OF RECLAMATION

MR. HUGH MOORE
FACILITATOR

TRANSCRIPT OF PROCEEDINGS

Reported by Carroll B. Copeland, CSR, RPR
Official-Freelance Court Reporter

Copeland Reporting Service
Libby, Montana - Phone (406) 293-7781

Letter TLIB1

Comments

Montana's native fish and wildlife species, recreational activities, the associated economic development and transportation access for Montana grain shippers.

Several State of Montana agencies are in the process of reviewing and preparing written comments on technical appendices to the documents that are of interest to their individual agencies. These written comments will be coordinated and submitted on behalf of Governor Mark Racicot and the State of Montana.

Preliminary discussion among the state agencies has yielded a number of concerns.

TLIB1-1

Among those concerns is the change in the focus of the system operation review from its original intent of providing a well-balanced ecosystem plan of operation for the Columbia River System to yet another narrowly-based and speculative recovery plan for threatened and endangered salmon. This bias in the tone of the document is stated on page 7 of the SOR Summary, and I quote:

"While one of the primary goals of the SOR is to decide upon a coordinated operating strategy to balance the conflicting demands on the

Responses

TLIB1-1. See Response TKAL3-1.

Letter TLIB1

Comments

TLIB1-1

system, the reality is that the need to recover threatened and endangered salmon, specifically, and all salmon generally, has taken precedence over other considerations. Much of the trading off that will be done in deciding on a system operating strategy will hinge on what can be gained for threatened and endangered salmon and at what cost to other uses."

TLIB1-2

While the hydrosystem should appropriately play a role in the recovery of the ESA listed species, of equal importance is the preventing the listing of other native species such as bull trout, recently determined by the U. S. Fish and Wildlife Service to be biologically warranted but precluded from listing at this time, and cutthroat trout, a species of special concern. Recovery measures can't be effective if pursued in isolation-- pitting one species against the other.

TLIB1-3

In addition, there is a lack of sound science supporting the linkage between higher flows and increased numbers of returning adult salmon. What we do know, however, with a high degree of certainty, are:

The biological costs to Montana's

Responses

TLIB1-2. See Response TKAL3–2.

TLIB1-3. See Response TKAL3–3.

Letter TLIB1

Comments

resident fish, such as the bull trout and the cutthroat trout and the dollar costs of the power system and the region's ratepayers, and the economic cost of those citizens who depends upon our water for their livelihoods.

Montana is very uncomfortable with being asked to contribute, to the detriment of the people of our state, towards actions with unsubstantiated benefits.

Montana's Governor Mark Racicot, has said time and time again that Montana wants to be a team player in the region. And we are willing to contribute our fair share. But we are not willing to be taken advantage of.

And at the last meeting a couple of commenters voiced their appreciation of Governor Racicot's efforts.

TLIB1-4

Another major concern of Montana agencies is the ambiguity that is generated by the absence of an identified preferred alternative for operating the river system. The operating strategies are extreme and do not contain a well-balanced alternative.

TLIB1-5

It is imperative that the State of Montana be given further opportunity to provide

Responses

TLIB1-4. See Response TKAL3–4.

TLIB1-5. See Response TKAL3–5.

Letter TLIB2

Comments

TLIB1-5

oral comments when an operating strategy has been identified and before a record of decision is entered into the federal register.

Montana urges the federal agencies involved with SOR to remain on course and seek a reasonable balance in river operations.

Thank you again.

MR. HUGH MOORE: Our next comment is Mr. Lienhan and he will be followed by Mr. Bass.

MR. TIM LIENHAN: I'd like to say thank you for everyone here addressing these, this situation or these situations.

TLIB2-1

It is my opinion that it is a sad state, sad commentary when you are pushed to the limits of addressing endangered species and addressing threatened species when we have technology and we have, apparently we have the knowledge to prevent this sort of thing, years prior to, you know, this situation at hand.

It is important. It is ridiculous when you pawn two species against each other and even more ridiculous when you can't come to a reasonable agreement to prevent that sort of situation.

So I think that we should continue to

Responses

TLIB2-1. Thank you for your comment.

Letter TLIB3

Comments

TLIB2-1

move forward, continue to have these discussions and continue doing whatever it takes to make sure that these situations are remedied and all species are, you know, able to make a living as we are.

And we should do the best that we can in that regard.

Thank you.

MR. HUGH MOORE: And Mr. Bass.

MR. RICHARD BASS: Thank you. Thank you all for coming over tonight. I don't have an affiliation.

TLIB3-1

I want to make sure two comments on the SOR, the purpose and needs. Talking about a growing population in the northwest but it doesn't address the energy concerns outside of the northwest. And it doesn't address conservation and the role that it can have in the future.

TLIB3-2

I'd like to see that put into the slide show, at least acknowledged, the possibility of it. And also in your publications.

I want to comment about the valley under the water behind Libby Dam. That is the Uro Valley. That is greatly, I think in the future, it is going to greatly affect the genetic structure of our valley.

Responses

TLIB3-1. The power impact analysis presented in the EIS is not limited to the Northwest, but considers power system linkages to other regions as well. The role of conservation in future energy supplies is appropriately addressed in BPA's Resource Programs and Business Plan EISs.

TLIB3-2. See Response TLIB3–1.

Letter TLIB3

Comments

Where I live, in the Yaak Valley, just to the west, that was really the only cross to the upper Kootenai was the original corridor for genetics migration in and out of the Yaak from the rest of Montana. And now it is, Idaho and Canada is about the only avenues into the Yaak.

TLIB3-3

And I want to ask that be put in the SOR publications and slide show, the percentage of power that leaves the Columbia River System be noted and also a map.

I saw a map of all the dams in the Columbia. Your map shows transmission lines leaving the Columbia. Where did they go? I think that would be a more helpful picture for people who live here.

Thank you.

MR. HUGH MOORE: That concludes our public meeting--

State your name and affiliation if you have one.

MR. MERLE DINNING: My name is Merle Dinning. I am a county commissioner from Boundary County, Idaho which is the county seat in Bonners Ferry. And I come here representing Boundary County and also the City of Bonners Ferry,

Responses

TLIB3-3. The slide presentation was developed specifically for the SOR public meetings on the Draft EIS; no purpose would therefore be served by modifying the slides at this time.

Letter TLIB4

Comments

representing them since somehow they were not put on the mailing list to receive all this information.

And my comments have changed somewhat since I have come here and listened to the people in Libby. I was going to make a pretty definite recommendation of what I thought was the most important of the strategies that would do the least amount of damage to us because I have worked with different agencies, Forest Service, the BLM, et cetera, and I found that usually they don't pay a whole lot of attention to you. But try to put you, get your impact in.

Right now though, I could say that for what would be the least damaging if it were some modifications made. And I think you folks have given the, lots of information that these folks need to help implement what is needed here.

TLIB4-1

Number 4 also would help the Kootenai River white sturgeon.

I just looked at a hydrograft that Jeff had here and those flows that would come out on approximately twenty to twenty-five percent of the years would give more than adequate flows for sturgeon spawning as was proven this year with

Responses

TLIB4-1. Thank you for your comment.

Letter TLIB4

Comments

TLIB4-1

those of Bonners Ferry being in the neighborhood of 20,000 cubic feet per second.

And the shape of those flows would be such, will have to be such that it was, that it would still protect trout spawning below the dam here, as well as the spawning of the, and rearing of the sturgeon in the lower reaches of the river.

TLIB4-2

Comments were made about the 35,000 cubic feet per second for sturgeon spawning is baloney., That is one man's opinion. And he forced himself on the sturgeon recovery committee. Jeff and Wayne tried to work with him as well as the Kootenai Tribe in Idaho.

This one gentleman would not listen to anyone and went and listed the Kootenai River sturgeon without looking at the other facts.

That is about all that I can say right now. But I will let others than me try to work together to keep in contact with these folks and give them our opinions as things and time goes on.

But don't let them forget that we are here and let's work together and keep our Kootenai Valley as we remember it and we want it.

Responses

TLIB4-2. The USFWS' March 1995 Biological Opinion for Kootenai River white sturgeon provides the scientific rationale for the proposed spawning flows.

Letter TLIB5

Comments

TLIB5-1

that out. Certainly will involve some flows.

MRS. LINDA McCLURE: What are you looking for time frame? What is the time frame for decision on flows to support sturgeon?

MR. WITT ANDERSON: We have to-- we have to reach a decision at least in the near term for the time we take the action at Service in indicating the flows are critical, at least in their view, by next spring. I think that we are going to have to have some decision under the ESA Section 7 consultation process by at least, by at least next year's flow.

Beyond that, the SOR long-term strategy is, our method or we envision that as addressing the needs at least in terms of the hydro operation and Libby Dam operation regarding sturgeon.

TLIB5-2

MRS. LINDA McCLURE: I can follow that up with when you provide the flows for the sturgeon, will those flows be predicated on our snow pack or will they be a fixed amount that the National Marine or the U. S. Fish and Wildlife; will they demand a certain amount of both water be discharged?

MR. WITT ANDERSON: I think that a simple answer to that, we don't know, not having

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Responses

TLIB5-1. The USFWS issued its Biological Opinion in March 1995. The SOR agencies expect to issue Records of Decision on the SOR actions by the end of 1995.

TLIB5-2. Forecast runoff volumes and refill probabilities have been incorporated into the specifications for the SOS preferred alternative.

Letter TLIB6

Comments

We did that for all seven of the strategies along and all the sub options or options under each of those seven strategies. There were twenty-one different hydro regular runs.

The third stage analysis was to essentially provide that information, that output to each of the River use work groups that we created, resident fish, anadromous fish, flood control, et cetera, the ones that you saw in the slide show.

And those groups sat down and determined the environmental impacts or effects associated with each of the strategies in a similar way. That allowed you to compare with say resident fish across all the strategies, which one is the best, worse, in between, resident fish the same for anadromous and so forth. Does that answer the question?

MRS. RITA WINDOM: Yes. I guess it does. However, I must comment, having been privy to watching one of the recreation work group meetings, if the rest of the groups were as inefficient as that one was, then I am wondering if the data is flawed before it ever got to the

TLIB6-1

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Responses

TLIB6-1. The SOR agencies regret any ill impressions resulting from workgroup meetings, although we would not equate a lack of reliable information in the early stages of the study process with an inefficient operation. As indicated in the Draft EIS, the Recreation Work Group conducted an extensive recreation survey of the region to develop more reliable data, which were used to prepare the revised analysis presented in the Final EIS.

Letter TLIB6

Comments

computer model.

I must say this, Linda was there at that meeting, too. People were ill prepared. They openly admitted that their consultant management team had given them flawed information and they debated also whether to start over or to take that flawed information and run with it.

TLIB6-1

We asked for copies of the minutes of the recreational meeting and it was totally useless because it would say so and so gave a report on such and such. Nothing about what was in the report.

I really don't feel that people in this area of the country got good representation in the recreational work study groups. And so I will take a very jaundiced eye at the strategies that are presented.

TLIB6-2

MR. PHIL THOR: Okay.

MRS. RITA WINDOM: The other question that I have was on alternative 4. It deals quite heavily in the biological rule curves or integrated rule curves as they are now being called. If the Northwest Power Planning Council does not act on those, they are now tainted and does not come out with a firm position on those,

Responses

TLIB6-2. Chapter 9 of the EIS Main Report describes the coordination process and outreach efforts for the respective work groups. While your perception is that the Libby area was not well represented, the agencies' perceptions are that the SOR study process included more broad–based local participation than is usually the case, and that the Recreation Work Group was able to elicit more local citizen involvement than many of the work groups. Also, please note that the Recreation Work Group included Corps staff familiar with the Libby project and Forest Service staff from the Kootenai National Forest.

Letter TLIB7

Comments

is probably not the best operation.

So, you know, even in Libby, there are going to be differences of opinion on that.

MR. HUGH MOORE: A gentleman back here has his hand up.

UNIDENTIFIED SPEAKER: I live a couple of miles out on the Kootenai River, a couple of miles down from Libby. And last year when I read in the paper about the possibility of different management for the project up here, I asked Bob to come out and survey, kind of a big thing here, but to set up a transit and tell me just how much water could go by my house before I got water in the basement.

You know, paranoid. And so Bob came out. And my paranoia seemed to have a certain foundation. And that is the statement that 37,000 cubic feet a second I guess of water and I get water in the basement.

TLIB7-1

Now, you know, I hear fish interests and I am all for the fish. At the same time, I am interested in what Bob was saying, certain collective, and I prefer a strategy that didn't allow fish to spawn, you know, in my rec room.

TLIB7-2

MR. HUGH MOORE: Jeff, do you want to

Responses

TLIB7-1. The Corps is aware of your concern, and will monitor local conditions during sturgeon flow operations. The EIS considered the effects of various operations on flood stages and damages, although highly site-specific details of the results are not presented.

TLIB7-2. Thank you for your comment.

Letter TLIB8

Comments

say something?

MR. JEFF LAUFLE: Yes. I probably should have already pointed out that the integrated rule curves are still evolving. And flood control is one of the concerns that we have recognized and that we are still working on.

That and Wayne pointed out something to me that I forgot to mention, too. And that is still another concern which in fact, if and when it occurs, which it could the way Strategy 4, the way Strategy 4 is set up right now, that would be detrimental to the fish below the dam. And we certainly aren't looking for that, either.

So we are still working on the integrated rule curves some, you know, trying to straighten those problems out.

MR. HUGH MOORE: Yes.

MRS. RITA WINDOM: Our Canadian neighbors to the north are very, very unhappy with us on two fronts. One, the dam and the other is adjacent neighbors over the demise of Lake Koocanusa. And I understand that the Canadian entitlements are coming in. How does this all mesh and give the Canadians the desired results that they would like to see?

TLIB8-1

Responses

TLIB8-1. The SOR agencies do not foresee the demise of Lake Koocanusa. Chapters 7 and 10 of the EIS Main Report address the Canadian Entitlement action of the SOR, and how it relates to the other SOR actions and other current processes within the region.

Letter TLIB8

Comments

pursuing along with the SOR.

Some of them obviously, you have to make, to make operational changes that the SOR is addressing. That is why we are looking at drawdowns as well. As ESA is looking at drawdowns and sharing water system integrated on those kind of strategies because we are sharing information that each has provided to the other.

MR. HUGH MOORE: Third question.

MRS. RITA WINDOM: I would like to state my name again, Rita Windom. And I would like to address Mr. Burley's concern about his house.

I have a friend who lives directly across the River from Mr. Burley. At 22,000 cfs this summer, she had, Mr. Gates made concern about the underpinning on her house.

I have advised her she better get flood insurance now while she still can.

TLIB8-2

My question, however, is, since the people who built on the River built in locations that they did after the building of Libby Dam, they built with reasonable expectations of not having a major flood, a man-made flood. What are the legal ramifications for the Corps of

Responses

TLIB8-2. Residents' reasonable expectations and the rights and obligations of the respective parties remain unclear; the Corps will consider this issue as it monitors effects of the sturgeon flow operations.

TLIB8-2

Engineers, as the acting administrator, if they decide to loose 37,000 cfs and flood these people out?

MR. WITT ANDERSON: I am not sure that any of us should address the legal issues here. We will be happy to go back and ask that question of our counsel and give you the best response that we can unless, Bob, you want to take a shot at that? But that is a very specific question, obviously.

MR. BOB SCHLOSS: I won't take a shot at the legalities, very bad. In point of fact, we release 27,000, 25,000 to 27,000 fairly routinely. And we have done that a good deal of the time, a fair amount each year since the project has been in place.

And I am unaware of problems at or near 22,000 discharge. I am aware of problems at somewhat higher elevations, as in the case of Alan's place.

There are undoubtedly situations in the future due to natural causes and beyond our control, we will be releasing flows of that magnitude. Sturgeon flows of 35,000 cfs in the Bonners Ferry area reaches of the River would not

Letter TGCL

Comments

Responses

PUBLIC MEETING ON THE COLUMBIA RIVER

SYSTEM OPERATION REVIEW (SOR) DRAFT EIS

APPEARANCES:

MR. HUGH MOORE, Facilitator

MR. WITT ANDERSON, U.S. Army Corps of Engineers

MR. JOHN DOOLEY, Bureau of Reclamation

MR. PHIL THOR, Bonneville Power Administration

TAKEN ON: Thursday, September 22, 1994

TAKEN AT: Grand Coulee Dam Power Office
Grand Coulee, Washington 99133

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PUBLIC MEETING ON COLUMBIA RIVER SOR DRAFT EIS

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SOR PUBLIC MEETING

September 22, 1994

TESTIMONY

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Letter TGCL1

Comments

PUBLIC MEETING ON COLUMBIA RIVER SOR DRAFT EIS

I would like to ask each commenter to come up to the podium so the reporter can be sure to catch every word. The next person to give testimony after Mr. Pritchard will be Jeff Atkinson. If we could keep your comments to within about five minutes, I'll let you know when the five minutes are up and then you can close your comments if you haven't already and appropriately after that time is up. Would that be all right?

MR. PRITCHARD: I'm Jim Pritchard of Wilbur, Washington, and am a member of the Lake Roosevelt forum, Lake Roosevelt Property Owners Association, Lake Roosevelt Water Quality Council, the Ranch Marine Park Homeowners Association. I'm not speaking for any of those groups even though I am president of a couple of them, but I am speaking for myself.

TGCL1-1 My preferred alternatives would be 4a1 and 1b and 2a, in that order. Realizing that we as citizens have got to take action to see that our congressional delegation passes some legislation to modify the Endangered Species Act before we get too far with this total process, and along with that, perhaps the solution is to decide how much money it's going to take and take that money over on to the

TGCL1-2 coastal streams, improve those so we can raise salmon over there and that they can have salmon go out to the ocean, etcetera, etcetera, and keep all of the -- so that we don't

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Responses

TGCL1-1. Thank you for your comment.

TGCL1-2. See Common Response No. 6.

Letter TGCL2

Comments

destroy the economy of the northwest any more than we already have with other effects of the Endangered Species Act.

MR. MOORE: Thank you. Mr. Atkinson, and you will be followed by Dick Erickson.

MR. ATKINSON: I guess I'm far enough away from my commissioner that he can't kick me if I say something wrong, but --

MR. THOR: He probably knows where you live.

MR. ATKINSON: Yeah. He knows where I work.

First of all, we think that the SOR process has been managed very well. There has been ample opportunity for public input, and the documents, even though there is 31 pounds of them, have been clear and thorough and very well written, and we appreciate you folks coming out on the road like this.

Romeo was telling me that one of you is expecting here in the very near future so I was trying to see which one was the most tense up here.

TGCL2-1

One comment that you may have heard is that there is some confusion about the economic impacts as they are laid out in the newsletter. It states that there is an economic impact, and some people are thinking the positive number means a favorable impact. So I'm sure you'll take care of that.

Responses

TGCL2-1. Thank you for pointing out the potential for misunderstanding on economic impacts.

Letter TGCL2

Comments

PUBLIC MEETING ON COLUMBIA RIVER SOR DRAFT EIS

TGCL2-2

One thing that Grant is worried about is that the agency not lose sight of the original intended purpose and that's to provide the environmental coverage for the PNCA and CEAA.

I think we'll leave it to our written comments to tell you which of the alternatives we're in favor of, but besides an alternative, we are very concerned about the Columbia River regional forum where these decisions will be made on an annual basis.

First of all, I think we disagree that the form of the forum has no impact on the environment. There is currently a mechanism in that forum idea that allows for real time changes to river operations, and the system has been operated for power for many years now and has established its own delicate ecosystem, so to speak, and to make dramatic sweeping changes without evaluating their annual or life cycle impacts on the environment is going a little too fast. To return quickly to a damless river situation might just devastate everything in the river.

We believe that the steps should be made in slow, well thought out increments so that their effects can be evaluated and isolated and verified.

TGCL2-3

And concerning the process to allow those river changes, we feel that the onus should be on those that are proposing those changes to demonstrate and provide evidence

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TGCL2-2. The SOR agencies believe that the Final EIS provides adequate NEPA coverage for these two SOR actions.

TGCL2-3. Thank you for your comment.

Letter TGCL2 Comments

Responses

of what the benefits will be and what the costs will be and that there be ample opportunity by all those involved in that forum to review and critique that evidence.

Finally, we feel like the forum will not have any legitimacy if there is not regional buy-in, that that is the one forum to address these concerns, and I'm not sure how you're going to do that. You can't supercede a political process entirely, but best efforts should be made to point people towards the forum as the one stop shopping place for discussing changes.

TGCL2-3

I had some comments on what's been said tonight. I would like to mention again that the changes in river operations affect Grant County PUD specifically in a triple fashion. First of all, the increases to Bonneville's cost, and since we are a major purchaser of Bonneville power, drives our cost up. It affects our firm generated capability so we need more of Bonneville's or other's power. And since a lot of our spill programs are based on a percentage of the flow that come down the river during the fish flush season, then the more water that's provided during those months results in increased amounts of spill, and we're doing what Bonneville is currently doing and we've downsized and gone through some very painful things to streamline our processes, and even with that, we are facing rate increases that just might put some of these

TGCL2-4

TGCL2-4. The agencies have attempted to carefully consider all of the potential impacts of the actions under consideration, and the degree to which various parties would be affected.

Letter TGCL2 Comments Responses

TGCL2-4

farmers who are on the brink of extinction out of business. So the decisions that you make are affecting real lives.

And the slide show talked about I think it was a range of increases to power costs that topped out at 22 percent or something. I just want to make a point that that's an average, and that you've got specific situations such as ours that that range won't be representative. There is maximums and minimums.

And the rest of our comments we'll submit in writing.

MR. MOORE: Thank you. Next is Dick Erickson, and I hope I pronounce the name of the next party correctly, Ernest P. -- is it Cloven?

MR. CLAVINOL: Ernie Clavinol. I decline.

MR. MOORE: Then the next person after Mr. Erickson will be Gale Rukowski.

MR. ERICKSON: Thank you for the opportunity to comment tonight. My name is Dick Erickson. I'm manager of East Columbia Basin Irrigation District. We're located in Othello, and the East District delivers water to about a fourth of the existing Columbia Basin project.

I'll probably follow-up these comments with written comments later, but I do want to comment on several of the alternatives. The one thing that was stated in the slide show that the three of you have referred to numerous times

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is that the final solution will probably be a blend of what's being presented. I support that. There is probably none of these alternatives that because of the mix in interest groups are going to be able to make it all the way through.

From our standpoint, I think that -- and I guess I'll start out by saying I'm basing my comments on the assumption that strategy 1, the ESA alternative, is probably not available. If it is, I still think you can recover salmon in that scenario, but I politically doubt that's going to be enacted, but I think it's good that you studied it anyway.

I would prefer some combination of strategy 2 and 4. On strategy 2, when I say that, I'm assuming something in the range of as far as river flows or river operations of a '92, '93 operation which resembles the Power Planting Councils fish and wildlife phase 2 amendments. We think that's a reasonable approach.

TGCL3-1

We definitely don't support -- if current operations means '94, we don't support that. We think that biological opinion was politically driven, not scientifically driven, and if the biological opinion itself wasn't bad enough, then the decision to add spill on top of that was even more politically driven, and we don't think those are viable alternatives for salmon or economics or irrigation or power

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TGCL3-1. Thank you for your comment.

Letter TGCL3

Comments

or anybody. And so if that's what you mean by current operations, we oppose that.

I say we support some combination of stable storage. I say that within the terms of reasonable reservoir fluctuation. Obviously, with reservoirs and river flows, basic hydraulics tell you you can't stay full all the time, but the reason I stress that is there is so much pressure for draw downs, natural river scenarios that I think we need to speak out for something that resembles stable reservoir elevations.

TGCL3-2

The alternatives that call for draw down which include 3, which is flow augmentation; 5, the natural river; 6, fixed draw downs; and 7, the combination of those, all of those have tremendous impacts on upstream reservoirs in Washington, Idaho and Montana, and I think those alternatives have anadromous fish too high a priority and we're basically sacrificing the entire interior northwest, the economy, the recreation, the resident fish and wildlife just for salmon flows that aren't even -- science has not even universally accepted.

Everybody understands you have to have some flow before the fish can swim, but the politics have just gotten to drive that some flow is good so lots of flow has got to be the answer, and I think we're just discounting the entire interior northwest. So I hope that you'll use some

Responses

TGCL3-2. Thank you for your comment.

Letter TGCL3 Comments

balance when you select an alternative in that regard.

Along that line too, I also point out -- it was too dark. I couldn't catch the whole quote -- but in your slide show there was a statement that the salmon benefits of the natural river alternative are equal or may be superior to the transportation benefits for salmon, and the gist of that was that they were essentially equivalent. And so if that's the case, if they are equivalent, considering the cost of the draw down of the natural river alternative, I don't see why we should even consider those. If transportation can equal or approximate those benefits, we should stay with that.

TGCL3-3

I guess one of the reasons that some combination of current operations and stable storages is we think desirable is those also -- elements of those most resemble the Bevin plan, or the Snake River recovery team that was empaneled by NMFS. That plan basically builds in with what the power planting consulate had done. It looks at what can be implemented fairly quickly, and we have a high degree of success.

A lot of the Bevin plan, at least the river operations part, fit into your SOS 2 or SOS 4. I would suggest that as much as you can, you build your final solution around the Bevin plan because I think that's the best shot of time into what NMFS is doing, if what NMFS is doing is

TGCL3-4

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Responses

TGCL3-3. See Common Response No. 4.

TGCL3-4. The recommendations of the Bevan team were considered by NMFS in developing the draft recovery plan that NMFS released in March 1995. The SOS preferred alternative is consistent with the NMFS recovery plan and 1995 Biological Opinion. See Common Response No. 11 with respect to the Recover 1 alternative.

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predictable. I think that's a real unknown. I don't know what they're going to do next.

I would also like to comment the East District is a member of the Columbia River Alliance which is a coalition of economic river user groups that has been brought together for the sole purpose of dealing with the salmon problem, and not with the idea of combatting the salmon problem, but the idea that if we're going to get on with business we have to solve the salmon problem.

TGCL3-4

They have suggested an alternative, an additional alternative called recovery 1, which it also I think builds around the Bevin plan. It works on some of the earlier flow augmentation levels. It calls for improving transportation, barge transportation, and improving collection facilities for smolt. I think their plan needs to be considered, and to the extent you can, blend it into what your final solution is. I think they have thought it out fairly well. They're looking at the cost and benefits and trying to get the most fish benefit for the least cost. So I think you should give that fairly serious consideration.

In conclusion, I comment real quickly on the forum, that I would prefer either forum 1 or forum 2. Those most closely fit existing law, existing authorities and existing operations, and also, they keep most of the final decision

TGCL3-5

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TGCL3-5. Thank you for your comment.

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TGCL3-5

making power in the three operating agencies, which I think is important. I think it's great. I think you need the public input, but I think it would be a mistake to broaden it out too much and give other agencies too much clout. Thank you.

MR. RUKOWSKI: My name is Gale Rukowski. I'm an irrigated farmer from Lincoln County. I live in Wilbur, Washington.

How the Columbia-Snake River system has been operated in the past is very important to me, and as the gentleman before me said, endangered salmon can be saved but only by supporting most of the National Marine and Fishery Service Bevin recommendations.

These scientists do not think that increasing flows and draw downs is in the best interest of the endangered fish. The system operation strategies identified in the draft SOR are inadequate to provide for salmon enhancement and the needs of a multi river system. I support the Columbia River Alliance strategy called recovery 1. With this strategy improvements would be made to the smolt barging program. This should be done by adding more barges to the fleet and releasing fish closer to the estuary. A smolt collection facility should be built immediately at lower Granite Dam. Higher flow should be abandoned and only good science should be used in the recovery of

TGCL4-1

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TGCL4-1. See Response TGCL3–4.

Letter TGCL4 Comments Responses

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endangered species.

I oppose reservoir draw downs and higher flows. They are unproven scientifically to help the fish. They would lower farm commodity prices by increasing transportation costs also. Until the drought in the northwest is over, fish runs will probably continue to decline. The Corps of Engineers, BPA and the Bureau of Reclamation must retain their management role of the Columbia and Snake River system. These dams were authorized by congress to provide multi purpose benefits for the public.

TGCL4-1

As far as my local utility is concerned, these draw down and higher flows only equate into higher electrical rates. Seventy percent of our co-ops load, which is irrigation from deep wells, is threatened by any higher rates. Many of our farmers will be bankrupt by these increasing rates and possibly my local utility.

In summary, whatever the Corps does, economics must be accounted for. The people of our region can no longer afford these expensive and poorly planned flows and draw downs with little or no benefit to salmon. Thank you.

MR. MOORE: Is there anyone else who didn't sign up or decided to pass who would like to give testimony now? Yes, sir.

MR. SNEAD: My name is Tim Snead, Grant County commissioner.

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I would, first of all, like to see irrigated agriculture continued or enhanced through the Bureau. How I see this whole scenario is that the people in the Pacific Northwest -- it's costing the people of the Pacific Northwest billions and billions of dollars, not only the people but industry and agriculture, to get these smolting salmon or the juvenile salmon down the river.

Where I think we haven't addressed is we could have I don't know how many millions of juvenile salmons going out in the ocean, but until we get a handle on how many are caught and what's fished out of the ocean, how do we know what's going to come back? I think our main problem is we're fishing out of our oceans. We're over fishing, and until we get a handle on what's being caught out in the ocean, I feel the people of the Pacific Northwest are being penalized for a problem that is worldwide, and I think I'm more inclined with more of a control in the fishing industry also. We should have an idea of what's going out before we really decide what's coming in, because what's getting fished out of there I don't think we can get an accurate picture what kind of success rate we're having.

So to me I think the Pacific Northwest or the people in the Pacific Northwest right now are paying the brunt of the fishing industry.

TGCL5-1

MR. MOORE: Anyone else who would like to give

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TGCL5-1. See Common Response No. 6.

Letter TGCL6

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MR. THOR: I thought that might be where you were going. We show the rate increases and the rate impacts separately in a different section away from the irrigation.

MR. ATKINSON: I know that our irrigators, if we see a change in river flows and it hits them in three ways, Bonneville's costs go up, our costs go up as Grant County PUD, and our costs go up in several ways also since we buy the power from Bonneville, then we see a direct purchase power increase. Since we lose firm generation, that increases the amount of power we have to buy from Bonneville, and since we have a spill program in those months when fish are migrating, we also have lost revenue. So our irrigators really see a large hit in alternatives 2 and 4.

MR. MOORE: Another question from someone else in the audience? Yes, sir.

MR. MATHISON: I'm William Mathison, retired Columbia Basin farmer.

TGCL6-1

In reading the various media height, it seems to me that the salmon have taken over all of you guys. I think we need to educate -- somebody needs to educate some people that it would be better to raise spuds and beef than to raise salmon.

Besides, as the man from the PUD just mentioned and the tape did too, this running water flow over the dams is

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TGCL6-1. Thank you for your comment.

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TGCL6-2

going to add two-and-a-half million, I believe the figure was, to the cost of farming. There is an awful lot of farmers out there that can't survive that, and irrigating has come to the point now where electricity is a very important part of it.

MR. MOORE: Thank you. Other comments or questions?

MR. FELTON: I'm Larry Felton, Okanogan PUD.

I had a question. I've noticed that in the paper that NMFS is proposing to review all west coast stocks, and I wonder does this have some impacts on the SOR in your opinion, and if so, what they would be?

MR. THOR: I would say no. We're caucusing up here.

My personal opinion is that it really probably doesn't affect the SOR significantly. That review is going to take them some amount of time to complete.

To the extent that that review shows additional stocks that are in trouble or need to be listed, that hydro operations that are considered through this process will have to deal with those stocks as it does the current listed ones, and I don't see that the reasons that these new stocks would be listed wouldn't be affected in a somewhat similar way by either our solutions or our cause.

So that the onus on us is simply to continue to move

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TGCL6-2. The EIS recognizes the impact issues that face irrigators, including the cost of electricity.

Letter TGCL7 Comments

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TGCL7-1

million acres in the Columbia Basin irrigation project. I think your tape said they didn't do 660-some thousand acres. It's my understanding they irrigate about 550,000 acres, and then you dropped the continuation of that irrigation project, which is very detrimental not only to Grant County but also Lincoln County and Franklin County, and we feel in the counties that this issue with the salmon has been a great hardship to the agriculture community in our counties, and we believe that the irrigation project should continue because we do have a water right for 1.2 million acre feet, which we only use -- I can't remember how many acre feet we use right now but we do have water rights for more than what we are receiving, but I do want to make you aware that this is very economically -- causing an economic hardship for the counties.

MR. DOOLEY: I'm aware of the Columbia Basin situation and that the expansion has been put on hold and those kinds of things. Today's climate doesn't look very favorable to that expansion. I'm aware of what you're alluding to there.

MR. MOORE: Thank you. Another question, comment? Yes. Your name, please.

MR. PRINGLE: Bud Pringle, Okanogan Lincoln Co-op, Winthrop, Washington.

Just a comment. I think for me to go across and look

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TGCL7-1. Further development of the Columbia Basin Project is an issue that is completely separate from the SOR, and outside the scope of the evaluation. The SOR agencies have no jurisdiction over water rights.

Letter TGCL8 Comments

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TGCL8-1

at these seven systems and try to determine which is best it would be hard to do, but I can go down the list and tell you what I think is more important, and I think power, flood control, irrigation and dollars are the ones you should be focusing mostly on.

MR. MOORE: Those would be the most important factors that should be considered in your view; is that correct?

MR. PRINGLE: Yes.

MR. MOORE: Thank you. Other comments or questions?

MR. CLAVINOL: I'm Ernest Clavinol, Soap Lake farmer.

How much success did you have last year when you dropped the Snake River to flood the or push the smolts down to the ocean? My understanding is with some of the people, because I know people there and I lived on the Snake River for several years, and I noticed that a lot of the -- when you put -- draw the water down on the Snake River, a lot of the banks gave away and I understand some of the roads had to be redone, and a lot of the fish that was in these pockets that didn't have no outlets, they just died there. They said there was an awful lot of them.

I know I've got a brother-in-law that lives over there, and he said he drove up and down along the main

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TGCL8-1. Thank you for your comment. The SOR evaluation has considered all of these uses or value measures, although the agencies have not prioritized decision factors in this way.

Letter TBOI

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PUBLIC MEETING ON THE COLUMBIA RIVER

SYSTEM OPERATION REVIEW (SOR) DRAFT EIS

September 26, 1994

HELD AT

Red Lion Downtowner
Boise, Idaho

MODERATOR
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BUREAU OF RECLAMATION
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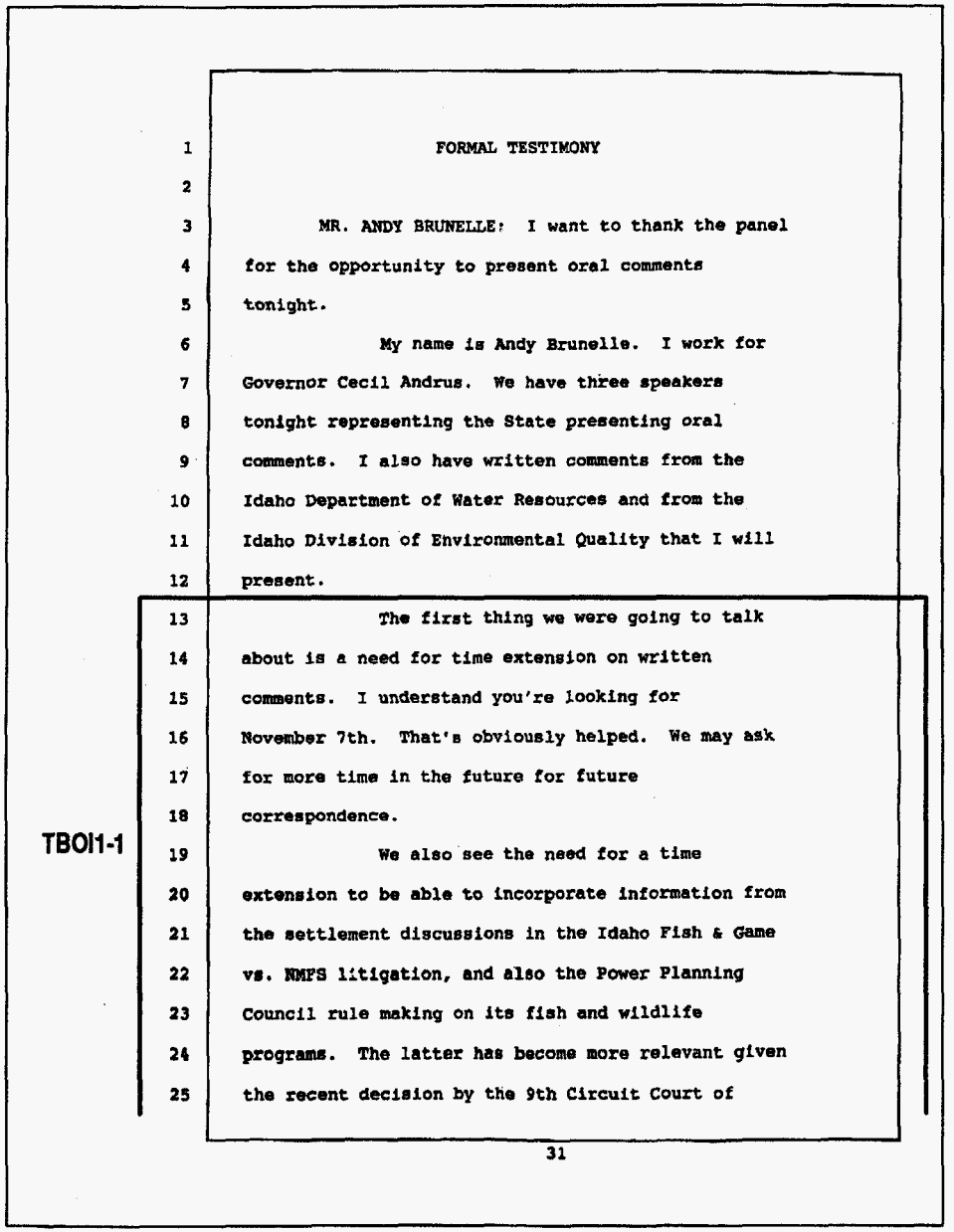

FORMAL TESTIMONY

MR. ANDY BRUNELLE: I want to thank the panel for the opportunity to present oral comments tonight.

My name is Andy Brunelle. I work for Governor Cecil Andrus. We have three speakers tonight representing the State presenting oral comments. I also have written comments from the Idaho Department of Water Resources and from the Idaho Division of Environmental Quality that I will present.

TBOI1-1

The first thing we were going to talk about is a need for time extension on written comments. I understand you're looking for November 7th. That's obviously helped. We may ask for more time in the future for future correspondence.

We also see the need for a time extension to be able to incorporate information from the settlement discussions in the Idaho Fish & Game vs. NMFS litigation, and also the Power Planning Council rule making on its fish and wildlife programs. The latter has become more relevant given the recent decision by the 9th Circuit Court of

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Responses

TBOI1-1. The close of the comment period was subsequently extended to December 15, 1994.

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Comments

TBOI1-1

Appeals, which ruled the Power Council must be more deferential to recommendations from agencies and Indian tribes.

TBOI1-2

The Power Act also calls for the federal operators to act in a manner consistent with what the Power Council puts in the fish and wildlife program. Avoidance of future litigation by the federal agencies should lead the agencies to develop a preferred alternative that closely follows what the council comes up with.

Our comments tonight on the draft EIS draw on our comments that we submitted in August of 1990. Since then a lot of things have occurred. A lot of water over the dam, I guess you could say. The salmon runs in the Snake River were listed as threatened. They further declined. Now they are listed as endangered. We have had a Salmon Summit. We have had Power Council rule makings. We have had studies by federal agencies. But the changes in the

TBOI1-3

operation of upstream water projects to address salmon migration problems that were created by the main stem dams while leaving the latter in the status quo position is not acceptable to Idaho.

TBOI1-4

Furthermore the delays in studies by the Corps of Engineers under their system configuration project

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Responses

TBOI1-2. The SOR agencies believe that the SOS preferred alternative is reasonably consistent with the Council's recommended program. Given the agencies' responsibilities under the ESA, consistency with the NMFS and USFWS Biological Opinions was understandably the primary concern.

TBOI1-3. Thank you for your comment. The SOR agencies must adopt a scope and perspective that includes the entire Federal system in evaluating operations objectives.

TBOI1-4. Thank you for your comment.

Letter TBOI1

Comments

undermines the region's ability to respond to the salmon's plight.

Idaho is particularly unhappy with the status quo which continues to delay drawdown while maximum flow augmentation from Idaho reservoirs continues. The drain Idaho plan, for lack of another name, is not sound biologically nor is it a matter of fairness for the neighbors in this region.

I have got four things to address specifically that we looked at in our scoping comments that I want to touch on tonight. We ask that the System Operation Review be an honest, thoughtful attempt to address multiple uses of the river, not a single view of other authorized uses taking water away from the hydropower system. We are concerned that the draft continues the premise that the alternative operations of the projects for fish migration are seen as a cost to maximization of federal hydropower. Yet there is a double standard because other operations of these same federal dams, be it for navigation, irrigation or flood control, are not articulated as a cost of hydropower.

Also we find the approach and methodologies appear to lead to an exaggeration of impacts from hydropower. Don Reading, an economic

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Responses

TBOI1-5. Thank you for your comment.

TBOI1-6. See Response S18–3.

TBOI1-7. See Response S18–18.

Letter TBOI1

Comments

consultant under contract to the State of Idaho, will elaborate on that.

We also recommended that the SOR be a legitimate effort to find solutions and not be used to further maximize hydropower or to justify past actions that degraded Idaho's resources. On this matter we commend the agencies for including a variety of alternative strategies. They are different enough that we really do have a broad range of looking at them. However, there is a disturbing note that the SOR is being used to ratify a decision of collection and transportation of juvenile salmonids without due regard to the recommendations of state fishery agencies and tribes. TBOI1-8

We also note concerns with the biological analysis needing to incorporate computer modeling information from these same state fishery agencies and tribes. We have Dexter Pitman from the Idaho Department of Fish & Game here tonight to speak to that.

We also believe that the remedies for the problems that were created by the slack water projects on the lower Snake needed to study an alternative operation like drawdown. Specifically TBOI1-9

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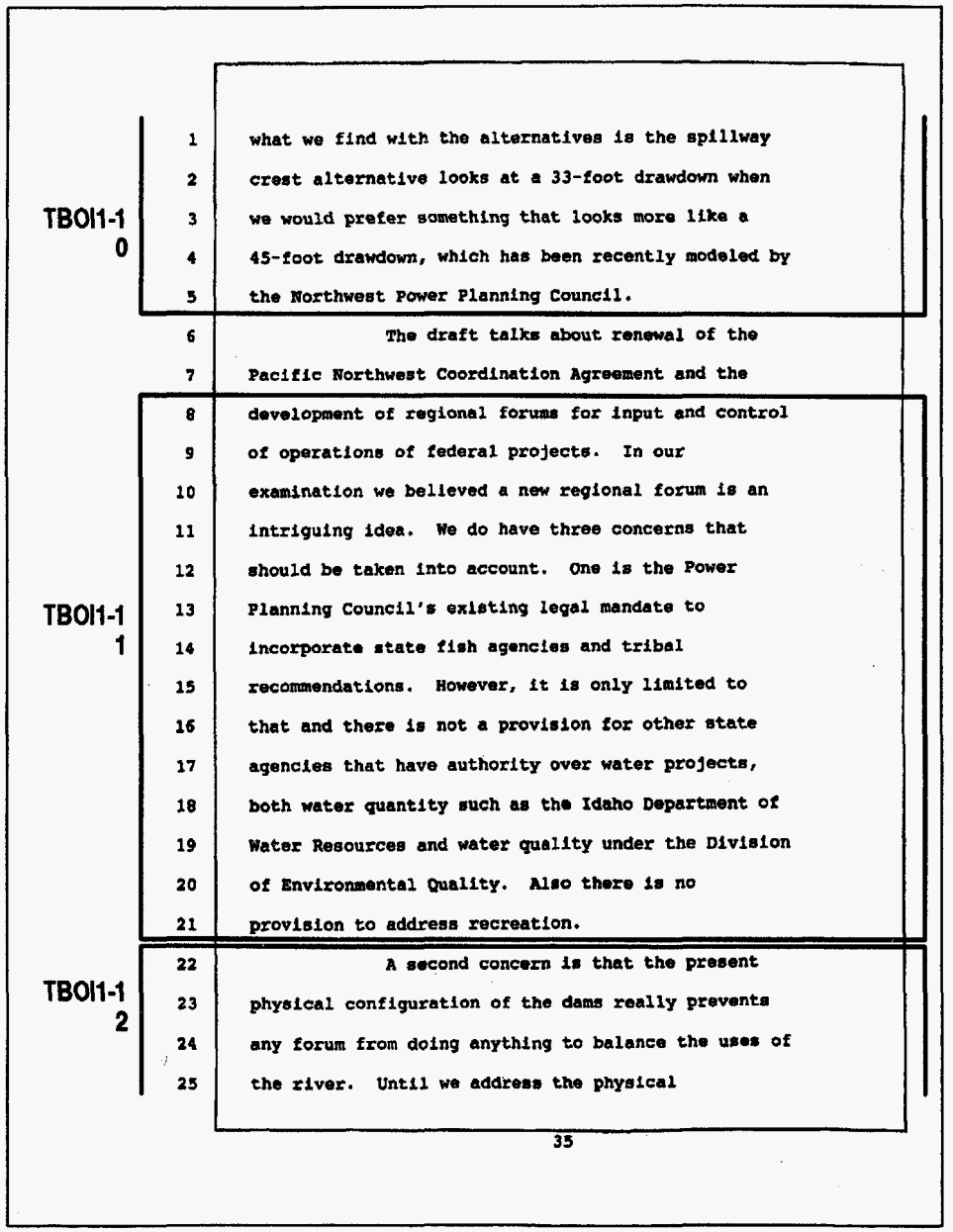
Responses

TBOI1-8. See Common Response No. 4.

TBOI1-9. The Final EIS includes analysis of SOS 9c, which includes a drawdown operation comparable to this suggestion.

Letter TBOI1

Comments



what we find with the alternatives is the spillway crest alternative looks at a 33-foot drawdown when we would prefer something that looks more like a 45-foot drawdown, which has been recently modeled by the Northwest Power Planning Council.

TBOI1-10

The draft talks about renewal of the Pacific Northwest Coordination Agreement and the development of regional forums for input and control of operations of federal projects. In our examination we believed a new regional forum is an intriguing idea. We do have three concerns that should be taken into account. One is the Power Planning Council's existing legal mandate to incorporate state fish agencies and tribal recommendations. However, it is only limited to that and there is not a provision for other state agencies that have authority over water projects, both water quantity such as the Idaho Department of Water Resources and water quality under the Division of Environmental Quality. Also there is no provision to address recreation.

TBOI1-11

A second concern is that the present physical configuration of the dams really prevents any forum from doing anything to balance the uses of the river. Until we address the physical

TBOI1-12

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Responses

TBOI1-10. The SOR agencies agree with this characterization of regional input to the NPPC.

TBOI1-11. Thank you for your comment.

Letter TBOI1

Comments

configuration of the main stem dams so that we can have reservoir drawdowns, the use of a forum to be able to act as a balancing venue, it might be functional. TBOI1-12

Finally, obviously there would be the existing authorities of federal and state agencies who would have to be clarified under such a forum. TBOI1-13

We agree also with the scope of the EIS being limited to the 14 federal water projects owned and operated by the Corps and the Bureau. Exclusion of the upper Snake projects operated by the Bureau and one by the Corps was a proper decision since the major drivers of the SOR is the Pacific Northwest Coordination Agreement and the Canadian Entitlement and the salmon problem created by the main stem dams. TBOI1-14

I want to end with the note that the status quo operation of the main stem projects is not working as a way to balance the uses of the hydro system.

The SOR offers a unique opportunity for the federal agencies to make system-wide departures from business-as-usual management of the main stem. The 9th Circuit Court of Appeals is the latest to criticize our regional recovery efforts that we have

Responses

TBOI1-12. The SOR agencies concur with this comment.

TBOI1-13. Thank you for your comment.

Letter TBOI2

Comments

TBOI2-1

First off, basically the picture painted by the SOR, particularly table 2-1, that table pretty well paints a picture that things aren't really too bad. It shows tens of thousands of fish available in the Snake basin. In reality we are talking about 1,500 wild spring and summer chinook combined adults coming over Lower Granite this year for all of northeast Oregon and all of Idaho. Several thousand miles of spawn in the area. These are the lowest numbers we have ever seen. Those are the numbers that prompted the National Marine Fisheries Service to reclassify this species as endangered, and rightfully so. Those 1,500 wild salmon have to provide for anywhere from 32 to about 38 distinct breeding units, and that is not many fish per breeding unit. There are very desperate problems facing us.

TBOI2-2

The future looks even less optimistic than the terrible picture we have just painted to you now. It is clear to me that a meeting the affirmative action is the only decisional course. Of those strategies that can change slack water reservoir water conditions and retain other hydroelectric reservoir opportunities, the reservoir drawdown, Strategy 6, fixed drawdown level, the

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Responses

TBOI2-1. The SOR agencies believe that the EIS accurately identifies the status of the wild runs.

TBOI2-2. Thank you for your comment.

Letter TBOI2

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TBOI2-2

TBOI2-3

hydroelectric system migration pools offers the best biologically effective strategy. However, I will point out that time is now probably the Snake River salmon's worst enemy. We have lost a lot of time in the SOR and other processes.

We are going to be looking very carefully between now and our final comments about all the strategies and other types of strategies which may help out on this desperate time when we will provide those written comments to you later.

There are inconsistencies I think that we need to be aware of in this SOR process, which would apply to achieving good affirmative action. It is critical that the SOR speak with one voice. Vague and contradictory language occurs in different parts of the SOR. These won't further the goals of NEPA and they also should be harmonized before the final EIS is prepared. I'll spell you the details of where those are in a section, but they basically detail areas of flow survival relationships. There are none in one part of the SOR, but yet there are in the other. We are left with, well, which is it. I think that's part of the problem you will have in reaching good, decisive affirmative action if in fact you haven't come to those conclusions.

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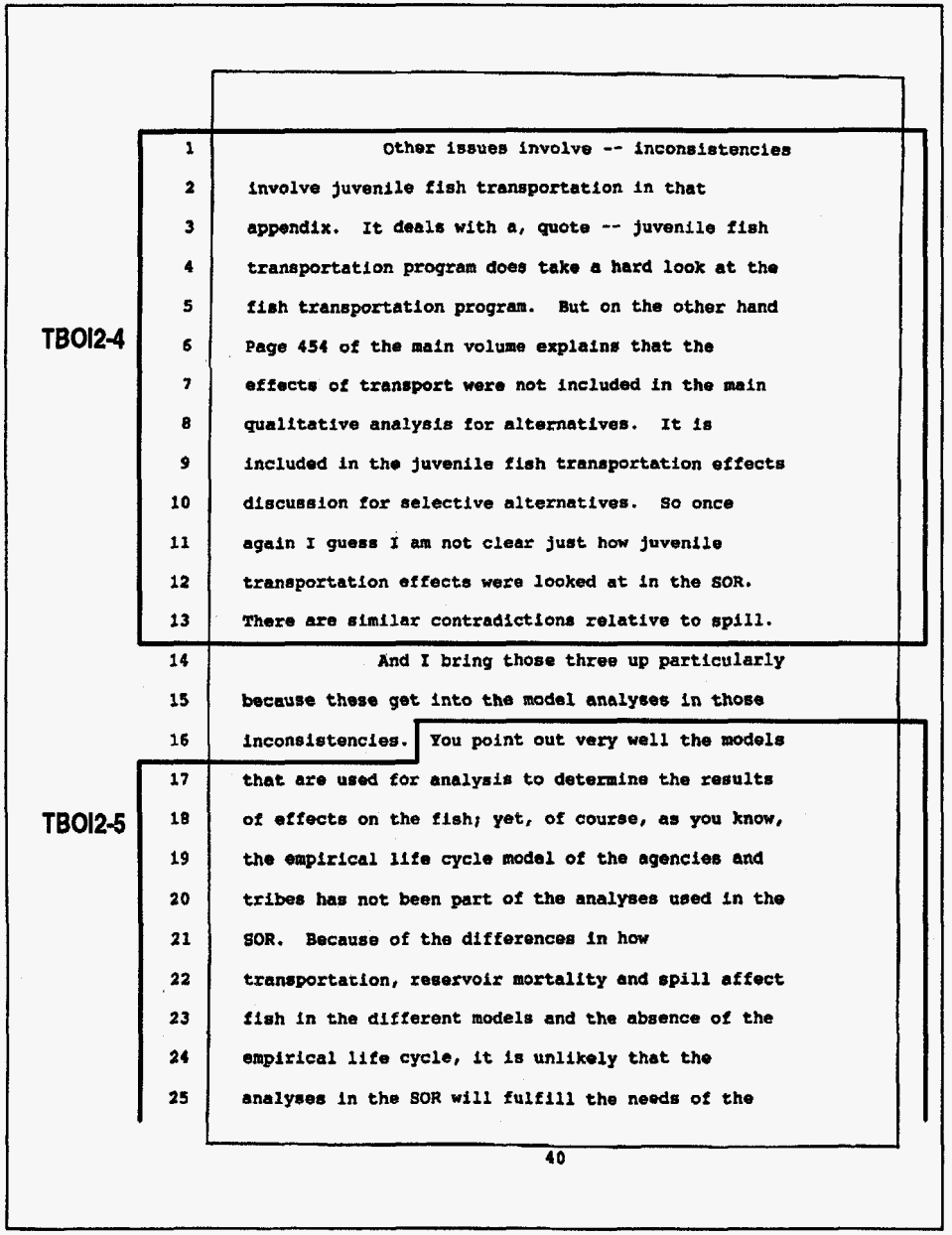
TBOI2-3. See Common Response No. 12.

Letter TBOI2

Comments



Other issues involve -- inconsistencies involve juvenile fish transportation in that appendix. It deals with a, quote -- juvenile fish transportation program does take a hard look at the fish transportation program. But on the other hand Page 454 of the main volume explains that the effects of transport were not included in the main qualitative analysis for alternatives. It is included in the juvenile fish transportation effects discussion for selective alternatives. So once again I guess I am not clear just how juvenile transportation effects were looked at in the SOR. There are similar contradictions relative to spill.

And I bring those three up particularly because these get into the model analyses in those inconsistencies. You point out very well the models that are used for analysis to determine the results of effects on the fish; yet, of course, as you know, the empirical life cycle model of the agencies and tribes has not been part of the analyses used in the SOR. Because of the differences in how transportation, reservoir mortality and spill affect fish in the different models and the absence of the empirical life cycle, it is unlikely that the analyses in the SOR will fulfill the needs of the

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TBOI2-4

TBOI2-5

Responses

TBOI2-4. See Common Response No. 4.

TBOI2-5. See Response T1–4.

Letter TBOI3

Comments

TBOI2-5

fish from the fisheries' perspective and expertise of the State of Idaho and other state and fish agencies.

So in a nutshell, I think Andy touched on the necessity to make sure that the SOR process keeps in sync with the Idaho Department of Fish & Game versus NMFS process, particularly the modeling process and others to make sure they are complementary to one another, and particularly the SOR process doesn't get out in front and make conclusions prior to the NMFS conclusions.

Don Reading will help out in some of the economic questions for the State of Idaho.

MR. HUGH MOORE: Mr. Reading is next and will be followed by Mr. Chapman.

MR. DON READING: Thank you. Don Reading, Ben Johnson Associates, appearing on behalf of the State of Idaho. Given the short time frame here, I am going to limit my comments on only the power portion dealing with only Alternative 6 or drawdown.

TBOI3-1

The SOR approach looked at two basic approaches at finding replacement power. One was with a combustion turbine and the other was with purchases. I think that's a rational way to start, but in decision-making it leaves you with a real

Responses

TBOI3-1. The power analysis for the Final EIS used a different approach that involved only one assumed power supply response, rather than two.

Letter TBOI3

Comments

TBOI3-1

wide range. For instance, the amount of power runs from a low capacity of two million up to 158 million. And when you're stacking up against other alternatives, a narrowing of the range would be useful.

TBOI3-2

This range is high relative to other areas or studies that have been done, particularly the Huppert report, which came out without a river simulation system, found the range to be between 41 and 97 million dollars on power losses.

Probably the most important thing since the draft EIS came out I think that should be under consideration, and this was off Mr. Brunelle's comments, and that is the Power Council is looking at various alternatives and, for example, they found that drawdowns, a two and a half month drawdown for energy would cost the system 25 megawatts and $21 million, quite different than the upper range in the SOR or the CT case range in the SOR of 158 million. And I think it is incumbent that those studies that are coming out now from court mandated areas under consideration, that they should be included.

It is not hard to understand or at least to look at the SOR as to why some of these

Responses

TBOI3-2. See Response S18–25.

Letter TBOI3

Comments

higher costs are generated. As you can understand the stack of paper there, it is difficult to dig in, but it appears that one of the major costs to energy in the Northwest is what they call curtailment costs or in essence shutting off DSIs to the aluminum companies. The SOR states they are pricing out at three cents per kilowatt-hour or 30 mils per kilowatt-hour.

And I have a problem with that for two reasons; one, certainly the aluminum companies have interruptible contracts to start with. If we are interrupting the aluminum companies for the need for fish, that's to me a legitimate thing. The aluminum companies get very cheap power. In fact, you look past the past few years and they are buying power for two cents a kilowatt-hour. One of the reasons they get it so cheap is because they are interruptible.

So we are left with a situation where fish are being assigned a loss or a cost of three cents per kilowatt-hour. Yet the revenue from the aluminum companies is only two cents. If this was a small amount, that wouldn't be a problem, but looking at the charts, it looks like about half of the energy loss or drawdown was assigned to these

TBOI3-3

43

Responses

TBOI3-3. See Response S18–18.

Letter TBOI3

Comments

TBOI3-3

"curtailment costs."

Another thing if you look at it, there is no seasonal variation in the pricing out of power, with one exception and that is where they are looking at the cost to pumpers, those 14 pumpers that Mr. Lansing talked about, and then they had seasonal capacity value. Well, if you look at the data from the SOR, the period from September up to April, which is the winter period when the system

TBOI3-4

peaks, due to the drawdown strategy, there are 962 more megawatts. If you look at the period from April to August, for the spring and summer, there is a loss of 4,418 megawatts. Well, as everyone knows who looks at the system, the value and the price and the cost of power in the winter is significantly higher than that in the spring. So I think looking at the seasonal variation in both capacity and also energy values would be important.

That's especially important with capacity because capacity in the spring has such a low value. Your slide show indicated that the cost of modifying the dams was four billion. If you look

TBOI3-5

at the drawdown scenario, it's significantly less. The SOR case has it at about 1.2 billion. A recent report by McClain from Morrison-Knudsen indicates

Responses

TBOI3-4. See Responses S18–18 through S18–20.

TBOI3-5. See Response S18–21.

Letter TBOI4

Comments

TBOI3-5

that the modification in reality won't take 17 years and will cost only about 600 million.

You add all of these things together and it's apparent that the costs of the drawdown scenario in the SOR are too high, that the actual range is only in the 30 to 80 million dollar range, and that's a small price to pay for the lowest area in the region -- the lowest cost energy in the country to have a less than 5 percent increase. Thank you.

MR. HUGH MOORE: Next is Mr. Chapman, who will be followed by Mr. Diehl.

MR. SHERL CHAPMAN: Thank you. My name is Sherl Chapman, and I am the executive director of the Idaho Water Users Association. The association represents irrigation districts and canal companies across the state, and so any of these options that relate to water, of course, affect us a great deal.

In looking at the SOR, I tried to put together testimony that was positive in nature, but I find very little that appears to be positive from our perspective in this SOR -- excuse me -- EIS.

TBOI4-1

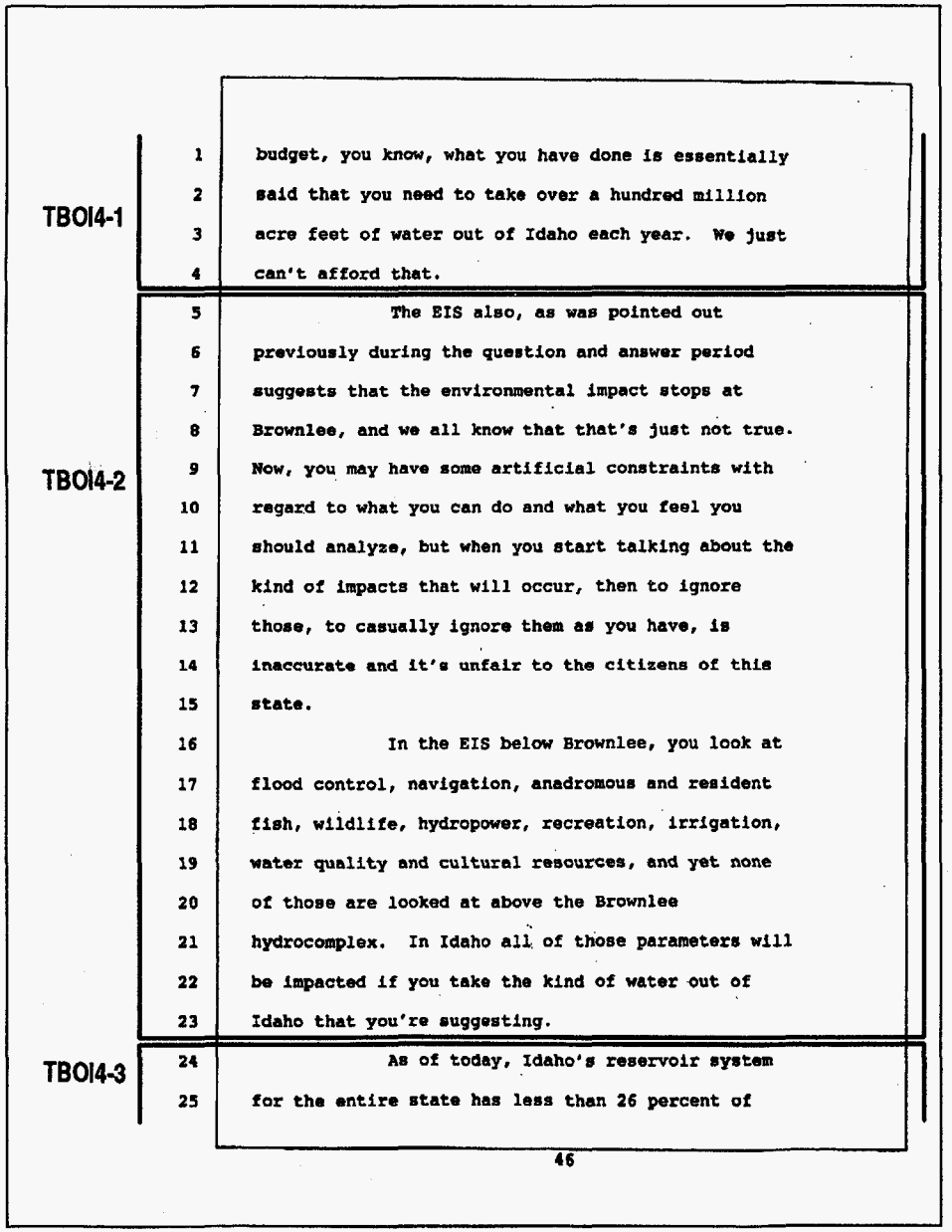
All of these options suggest that significant quantities of water be taken out of Idaho. By adopting the Northwest Power Planning Council water

Responses

TBOI4-1. The original NPPC Water Budget includes 1.19 MAF from the Snake River. The most recent NPPC amendments would increase this volume substantially, but the resulting total volume is still a small fraction of the figure referenced in this comment.

Letter TBOI4

Comments



budget, you know, what you have done is essentially said that you need to take over a hundred million acre feet of water out of Idaho each year. We just can't afford that.

TBOI4-1

The EIS also, as was pointed out previously during the question and answer period suggests that the environmental impact stops at Brownlee, and we all know that that's just not true. Now, you may have some artificial constraints with regard to what you can do and what you feel you should analyze, but when you start talking about the kind of impacts that will occur, then to ignore those, to casually ignore them as you have, is inaccurate and it's unfair to the citizens of this state.

TBOI4-2

In the EIS below Brownlee, you look at flood control, navigation, anadromous and resident fish, wildlife, hydropower, recreation, irrigation, water quality and cultural resources, and yet none of those are looked at above the Brownlee hydrocomplex. In Idaho all of those parameters will be impacted if you take the kind of water out of Idaho that you're suggesting.

As of today, Idaho's reservoir system for the entire state has less than 26 percent of

TBOI4-3

46

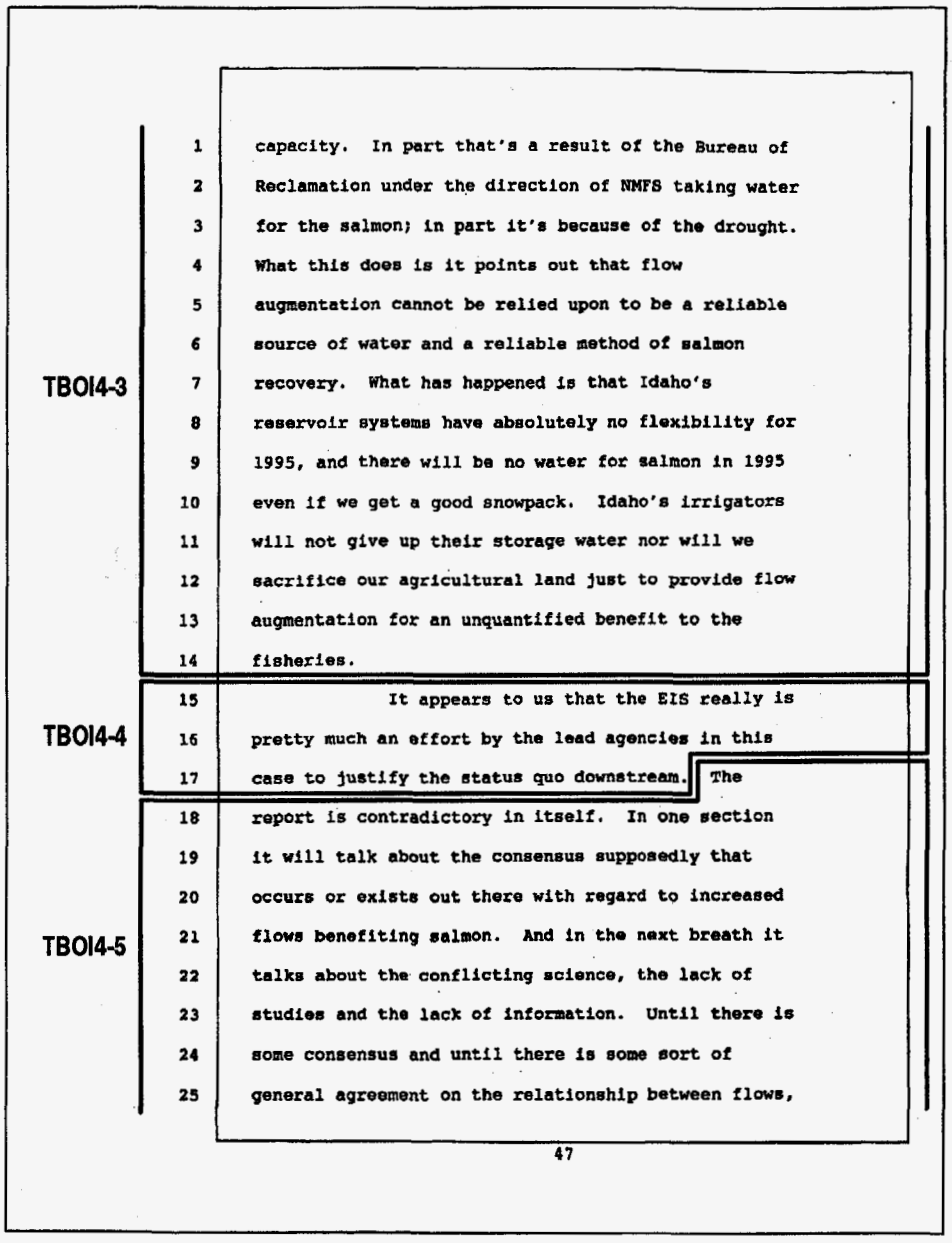
Responses

TBOI4-2. See Common Response No. 3.

TBOI4-3. Refill probabilities and the reliability of water supplies have been considered in developing alternatives and modeling their hydrologic characteristics.

Letter TBOI4

Comments



capacity. In part that's a result of the Bureau of Reclamation under the direction of NMFS taking water for the salmon; in part it's because of the drought. What this does is it points out that flow augmentation cannot be relied upon to be a reliable source of water and a reliable method of salmon recovery. What has happened is that Idaho's reservoir systems have absolutely no flexibility for 1995, and there will be no water for salmon in 1995 even if we get a good snowpack. Idaho's irrigators will not give up their storage water nor will we sacrifice our agricultural land just to provide flow augmentation for an unquantified benefit to the fisheries.

It appears to us that the EIS really is pretty much an effort by the lead agencies in this case to justify the status quo downstream. The report is contradictory in itself. In one section it will talk about the consensus supposedly that occurs or exists out there with regard to increased flows benefiting salmon. And in the next breath it talks about the conflicting science, the lack of studies and the lack of information. Until there is some consensus and until there is some sort of general agreement on the relationship between flows,

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TBOI4-3

TBOI4-4

TBOI4-5

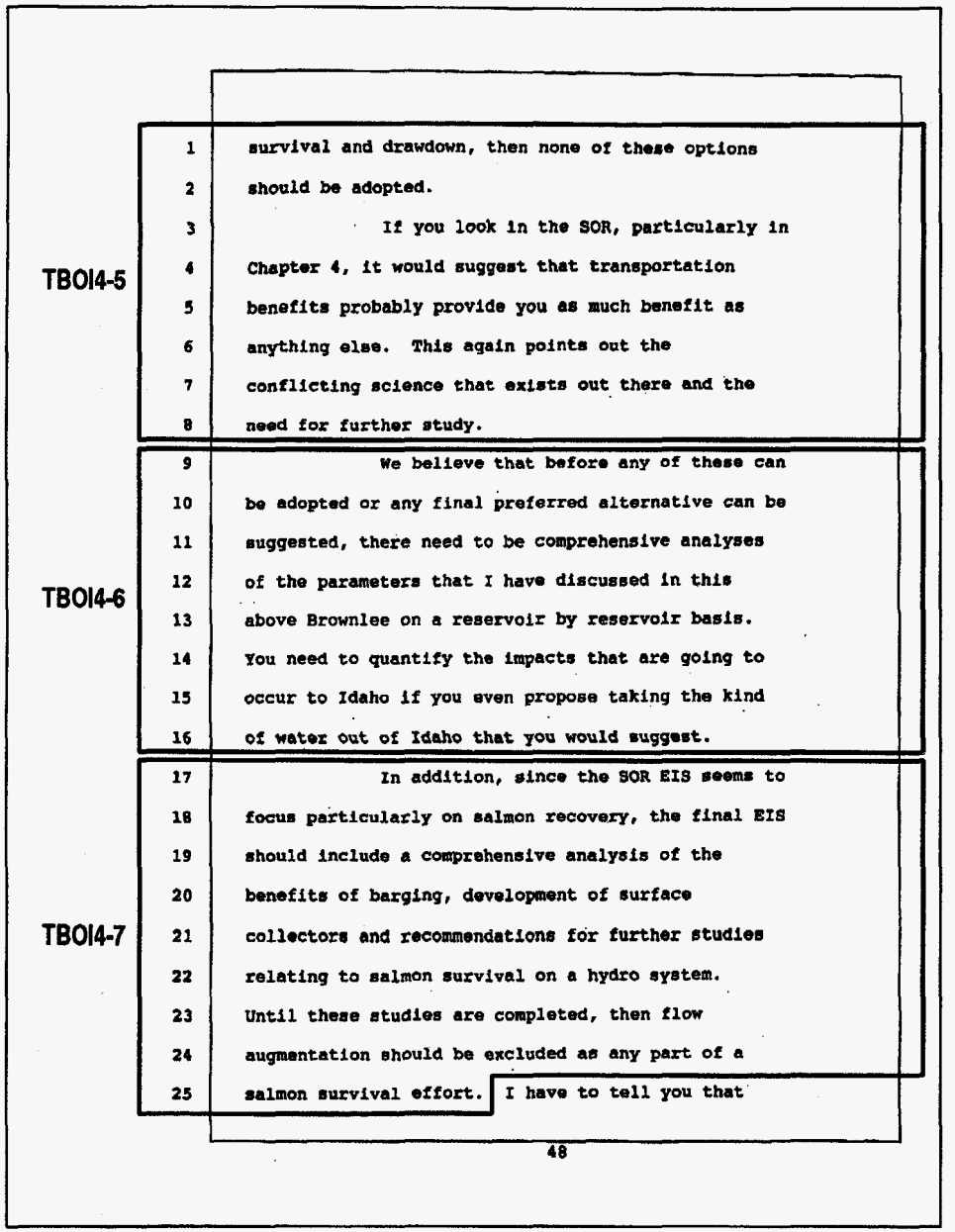
Responses

TBOI4-4. See Common Response No. 2.

TBOI4-5. The SOR agencies believe that the EIS adequately makes the distinction that there is general agreement that such a relationship exists, but that there is disagreement about the degree of benefit at specific flow levels. See also Common Response No. 12.

Letter TBOI4

Comments



survival and drawdown, then none of these options should be adopted.

If you look in the SOR, particularly in Chapter 4, it would suggest that transportation benefits probably provide you as much benefit as anything else. This again points out the conflicting science that exists out there and the need for further study.

TBOI4-5

We believe that before any of these can be adopted or any final preferred alternative can be suggested, there need to be comprehensive analyses of the parameters that I have discussed in this above Brownlee on a reservoir by reservoir basis. You need to quantify the impacts that are going to occur to Idaho if you even propose taking the kind of water out of Idaho that you would suggest.

TBOI4-6

In addition, since the SOR EIS seems to focus particularly on salmon recovery, the final EIS should include a comprehensive analysis of the benefits of barging, development of surface collectors and recommendations for further studies relating to salmon survival on a hydro system. Until these studies are completed, then flow augmentation should be excluded as any part of a salmon survival effort. I have to tell you that

TBOI4-7

48

Responses

TBOI4-6. See Common Response No. 3.

TBOI4-7. See Common Responses 2, 4, and 5. The preferred SOS alternative is based on the recommendations of the NMFS 1995 Biological Opinion, which also requests additional studies of salmon survival.

Letter TBOI5

Comments

Idaho citizens, particularly its agricultural citizens, are just about to the point of drawing a line in the sand with regard to flow augmentation.

We see little movement downstream in efforts to provide anything for salmon recovery. And we feel that Idaho has been put upon, we have been called to sacrifice and we are at the point where we cannot sacrifice anymore. We need some leadership in this effort and I would suggest that you as the lead agencies in this can provide it if you can overcome the bureaucratic inertia. Thank you.

MR. HUGH MOORE: We have nine commentors remaining. Next is Mr. Diehl, who will be followed by Mr. Ray.

MR. TED DIEHL: My name is Ted Diehl. I am the manager of the Northside Canal Company and we own the biggest part of the space in the upper Snake above Milner. I am not going to say much. What I had runs parallel with what Sherl had to say. I would like to have the option of putting in a written statement before November 7th, which I will do. I only have one comment to make.

TBOI5-1

I grew up in the Magic Valley. I used to go salmon fishing up in the Stanley basin. We

Responses

TBOI5-1. Thank you for your comment. A key question facing the SOR agencies concerns which actions can be taken today to assist salmon recovery, given the present status of the runs and irrespective of the causes of decline.

Letter TBOI6

Comments

operated all the river above Milner the same as we do today and there were plenty of salmon then. So it cannot be the water coming from the upper Snake above Milner.

MR. HUGH MOORE: Next is Mr. Ray, who will be followed by Mr. Burkholder.

MR. CHARLES RAY: My name is Charles Ray and I represent Idaho Rivers United. I am going to use just a couple seconds of my time to take a couple pictures of folks in charge here. Thank you.

I hope someday I don't have to tell my kids why the salmon are extinct in Idaho, but if I do have to tell them, I am not going to tell them that some faceless, nameless bureaucratic agencies have allowed those fish to go extinct. I am going to tell people's names and I am going to show them the pictures of the people that go with the names.

I am here tonight to establish standing in the course of this process. I only have a couple comments. I will make some written comments later. But I was real interested in the reply to Mr. Kutchins' question that the mandate the operating agencies operate under -- I was really interested to hear the omission of the Northwest Power Act that directs the operating agencies to

TBOI5-1

TBOI6-1

Responses

TBOI6-1. The SOR agencies believe that the EIS does identify the Northwest Power Act among the applicable laws and regulations.

Letter TBOI6/7

Comments

TBOI6-1

afford equitable treatment to salmon with other uses of the hydro system. I hope that's an oversight, but the actions of the federal agencies to date show me that that's a deliberate omission. I hope you can correct that in the future.

The summary of your huge impossible EIS I think is very enlightening, and it tells a lot to the public, a public that was in my opinion purposely excluded from this process. The volume of that document speaks to that very nicely.

TBOI6-2

The "Mighty Columbia: Destiny of a Giant." I am glad you included this picture. It saves me from having to read this document, because in my opinion this picture tells it all. The destiny of a giant -- you have a picture here that has no fish on it. There is not a salmon on this picture. There is not a fisherman on here. There is not a member of an Indian tribe on here. I hope you correct that in the final version of the document. Thank you.

MR. HUGH MOORE: Next is Mr. Burkholder, who will be followed by Mr. Woodworth.

TBOI7-1

MR. REED BURKHOLDER: My name is Reed Burkholder. I am a resident of Boise. One comment about the SOR; you left out the best option. You

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Responses

TBOI6-2. The comment refers to a stylized graphic in the SOR tabloid that depicts the area around Bonneville Dam. The message received by the commmentor was not intended, and the many uses and values of the river system are repeatedly acknowledged throughout the SOR documents.

TBOI7-1. See Common Response No. 2.

Letter TBOI7

Comments

TBOI7-1

have got seven but you left out breaching dams. The dam breach option would be something like this. Breach the four lower Snake River dams and allow the river to regain its original character of rapids and pools. The dams each with a large portion removed would remain in place, inoperative memorials to the thinking of our grandfathers who loved to dam rivers but who were insensitive to the suffering they would cause to the salmon and to the people who value the salmon.

TBOI7-2

Now, I don't know how well you know these dams, but I have taken a close look at these dams over the last two years, and I have discovered something very, very curious that I want to share. The majority of the residents in the Northwest, in Idaho, Oregon and Washington, don't need them. We don't benefit from them. They are liabilities to us. They are not assets. Let me be specific.

They do not contribute any flood control for any of us. We have eight dams blocking Idaho or Astoria salmon runs, take your pick how you want to label them; only one of which has storage space, which is John Day, a small amount. These dams -- none of them provide irrigation storage water. That's curious from an Idaho perspective

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Responses

TBOI7-2. The EIS accurately and comprehensively identifies the uses, benefits and values of the mainstem dams. The SOR agencies neither accept nor reject the figures on local dependence on power from the lower Snake River dams, as our analysis is based on national and regional benefits and values.

Letter TBOI7

Comments | **Responses**

TBOI7-2

because all of us in Idaho, that's why we have dams here. That's why the Bureau of Reclamation did all their work in Idaho was to create water for irrigators, storage water for irrigators. There are no canals coming from these dams. They are not designed to store water. They don't store water. They are kept full year-round.

Concerning navigation, a teensy, tinsy minority of residents in the Northwest can claim some sort of benefit from navigation, from the navigational system. You know, it's curious to read the history of the building of this waterway to Lewiston. It's in a document called "The History of the Pacific Northwest Division of the U.S. Army Corps of Engineers." It's very clear everybody understood the waterway would never pay for itself. It was a financial loser from the beginning. It's still a financial loser. We talk about a crack in an Ice Harbor lock gate. Who's going to get to pay to fix this crack, folks? Is it Brix? Is it Tidewater? Is it Cargill? Is it Lewis & Clark Terminal? Is it the grain growers of North Dakota? Hell, no. It's you and you and you and you and everybody in this room and everybody else in this country. The navigation system to Lewiston is a

Letter TBOI7

Comments

Responses

TBOI7-2

taxpayer liability. It contributes to the national deficit.

The majority of us -- any way we want to stretch our imagination, we do not benefit from this navigation system. The majority of us -- now, this is really, really curious. The majority of us receive almost no benefit in electricity from these dams.

Folks, if you want salmon, you had better learn something about electricity. If you live in Walla Walla and your power company would be, what, Pacific Power? Greg?

MR. GREG GRAHAM: Yes.

MR. REED BURKHOLDER: .35 percent of your electricity is coming from the four lower Snake River dams. If you live in southwest Idaho like I do, .175 percent of your power comes from the four lower Snake River dams. If you live in Portland, 1 percent of your power comes from the four lower Snake River dams. If you live is Seattle and you buy from Seattle City Light, 3 percent of your power comes from the four lower Snake River dams. If you live in Spokane, the figure is 1.3 percent of your power. I would love to have someone challenge these numbers. This is darn curious. You know, I added

TBOI7-2

Letter TBOI8

Comments

TBOI7-2

up the number of residential customers in all of these utilities I just mentioned, I come up with 6.8 million people in a region of 8.7 million people. That's an 80 percent majority who are virtually independent of the electricity from the four lower Snake River dams. We don't need them. We never did need them. They were mistakes.

Let's add an eighth option to the SOR. The eighth option would be to breach the four lower Snake River dams. I will ask you to investigate this option, investigate it with the Corps. Thank you very much.

MR. HUGH MOORE: Next is Mr. Woodworth, who will be followed by Mr. Field.

MR. DICK WOODWORTH: Members of the panel and the rest of the audience, my name is Dick Woodworth. I am a retired director of the Idaho Fish & Game Department, past chairman of the Pacific Salmon Council, past chairman of the Tri-State Columbia River Salmon Council. I say that to let you know I have been around this thing for a while; like 32 years.

I am representing Fish Passage, Inc.

TBOI8-1

It is a small group formed to propose the Boylan pipeline concept. I heard a comment from the

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Responses

TBOI8-1. See Common Response No. 2. The pipeline concept is a non-operational measure that is beyond the scope of the SOR, but has been considered in the Corps' System Configuration Study.

Letter TBOI8

Comments

Responses

gentleman over here about the biological concerns. We have run this by every agency in the region and every committee and there has not been one biological concern defined concerning a pipeline. I am not saying they are not there, but it has not been looked at.

Our proposal is that this be studied on a small scale basis to see if it is practical. We have had an engineering study from Morrison-Knudsen at their expense saying that it could be built as depicted for $400 million from Boise -- or from Lewiston to Portland. We can run those fish through this pipeline at any speed necessary from one to four miles an hour. We could get the fish down past all the dams in four days or more, whatever the biological studies determine is good for it.

TBOI8-1

We have recently received support from two groups for the pipeline. One is the Idaho Fish & Game Commission. They said they have studied our proposal and they are very much in favor of testing it as soon as possible. They also are in favor of studying sonic guidance for collecting the fish to get them in the pipeline and keep the fish out of turbines on various reservoirs for resident fisheries. This has all been done on the East

Letter TBOI8

Comments

Responses

Coast. Why these guys haven't picked it up, I can't tell you. It's plain stupid not to go for this one.

Another recent support group, the Boise State University Engineering Department, they approached us and said we would like to entertain the idea of building the tri-pipeline concept. They have submitted a proposal for a grant from EPA to do this. I think that proposal will probably change considerably because they only got word five days before the closing period to put it together, but the basic thing is sound.

TBOI8-1

I would like to introduce Dr. Steve Affleck, chairman of the engineering department. You might raise your hand, sir; and Don Parks, a professor of engineering in the department.

The comment which practically was made that these fish should never see anything artificial, you have got to be kidding me. The whole thing is artificial. It's only going to get worse.

All we are saying is that this thing is ten times cheaper and ten times faster than any other proposal similar to it, including fixing the dams. It starts at five billion. Ours is 400 million. We can get down there in a year.

Letter TBOI8

Comments

Responses

TBOI8-1

Morrison-Knudsen has said it would be the easiest project they have ever built in the history of the company.

I guess my time is up, but I am saying you can't afford not to look at this thing at those prices if it works. It has tremendous application to resident fisheries as well. We can get fish back to all the original spawning grounds with this program. For you to throw it out, I can't believe what I am hearing. Thank you.

MR. HUGH MOORE: We have five commentors remaining. Next is Mr. Field, who will be followed by Mr. Bronco.

MR. MIKE FIELD: Thank you. My name is Mike Field. I represent Senator Larry Craig here in Boise. I would like to read a statement from the senator.

The decision to be made in this EIS is of great importance to Idaho. The stability of our irrigation reservoirs, recovery of our salmon, cost of power and status of recreation and fisheries within the state will all be affected.

I've examined the twenty-one strategies and options presented in the SOR. As everyone would expect, they differ in effectiveness, timing,

Letter TBOI9

Comments

implementation cost, and in many other aspects. However, there are a number of common things I think are worthy of emphasis.

Transportation of juvenile fish around the dams and reservoirs by barge and truck is shown to provide the greatest benefit for salmon in the foreseeable future. During a briefing in my office, I was told that transportation bolsters survival in all the options where it can be used. Its use improves spring chinook survival by 64 percent in the baseline option, and it is even more important to survival of fall chinook. The transportation option must continue. It is in place and already beneficial for salmon. We don't have to wait years for it to happen. Further, it can be improved upon by various means and made even more effective. Transportation is the single most effective short-term option we have for aiding salmon.

TBOI9-1

Flow augmentation beyond that included in the 1992-93 river operations makes no appreciable difference in the survivability of salmon in-river. Obviously some benefit accrues in low water years, but at other times the differences are not discernible. Once again, the SOR tells us that setting target flow rates in the Columbia and Snake

TBOI9-2

59

Responses

TBOI9-1. See Common Response No. 4.

TBOI9-2. See Common Response No. 12.

Letter TBOI9

Comments

TBOI9-2

Rivers so as to require a heavy volume of upstream water is not useful for salmon recovery. Heavy flow augmentation poses a threat to irrigation water in southern Idaho and severe disruption of recreation and business centered on Dworshak and other Idaho reservoirs. Judging by the adverse reaction to drawdown of Dworshak, Cascade, Brownlee, American Falls and Palisades reservoirs in 1994, Idaho citizens do not view these drawdowns as reasonable tradeoffs for salmon. In light of the SOR analysis, they should not.

TBOI9-3

Though the SOR modeled several options by assuming a zero mortality rate from gas bubble disease for comparison purposes, it is not so easy to wish away this problem in the real world. The science I have seen on this issue tells me that fish mortality will occur when gas supersaturation exceeds 110 percent. That is the standard set by the Environmental Protection Agency and subsequently adopted by the states of Oregon and Washington. The SOR options which reflect this real world data predict a negative effect on salmon survival. I see no reason to support spill options for future river operations.

The lower Snake River drawdown options

60

Responses

TBOI9-3. Thank you for your comment. The EIS addresses spill and gas supersaturation.

Letter TBOI9

Comments

presented in the SOR, including the natural river alternative, are problematic. They would require Congressional reauthorization of the projects involved as an initial step. Subsequently Congress would be asked to appropriate anywhere from $1.7 to $4.9 billion to fund physical changes which would be necessary at each project in order to make drawdowns work. Assuming that sequencing of annual appropriations could be perfectly aligned and that construction proceeds smoothly, drawdowns could be implemented in 14 to 17 years.

As the SOR points out, drawdowns would cause negative impacts in many ways while being of dubious benefit to salmon survival. The natural river option would, in effect, become a permanent river drawdown because of the time required to empty and refill the reservoirs in addition to the period of drawdown. The Corps of Engineers' draft System Configuration Study showed that a two month natural river drawdown would actually require three to seven months to carry out, and a four and a half month drawdown would take up to eleven months. River commerce and port operations, power production, and some irrigation would be disrupted during that time. And 1.7 million acre-feet of water would be required

TBOI9-4

61

Responses

TBOI9-4. Thank you for your comment.

Letter TBOI9 Comments

TBOI9-4

to fill after a natural river drawdown.

Depending on the depth, drawdowns of the four lower Snake River reservoirs require 900,000 to 1.3 million acre-feet to refill. Two month drawdowns would actually disrupt river operations from three to five months, depending on actual river flows at the time. The SOR claims a great deal of uncertainty as to the possible effects of drawdowns on salmon recovery. At any rate, the SOR options which permit transportation of the juvenile fish outperform the drawdown options (transportation would be impossible any time reservoir levels are below minimum operating pool).

TBOI9-5

I would point out that the SOR does not incorporate the 1994 results from pit tag studies of juvenile survival in Lower Granite reservoir. Survival through Lower Granite is apparently much higher than earlier thought, and much higher than the SOR models assume. If the new data were to be used in the models, then the disparity in benefits between transportation alternatives and drawdowns would be even greater. Also this new information presents a strong argument against the need to conduct a drawdown test at Lower Granite reservoir. I suggest the final EIS reflect this new data.

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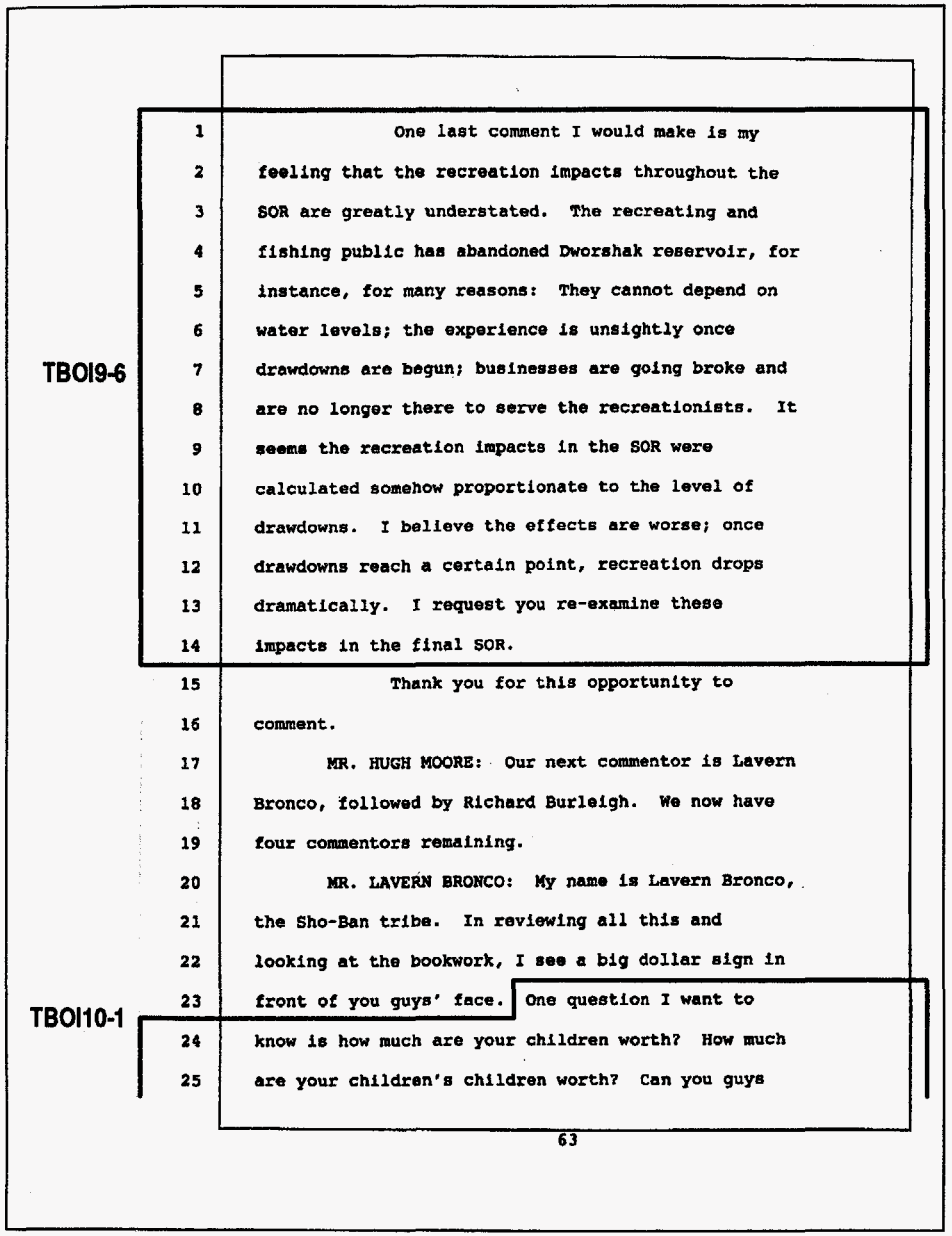
Responses

TBOI9-5. The results of the 1994 Lower Granite studies are addressed in the Final EIS.

Letter TBOI9/10 Comments



One last comment I would make is my feeling that the recreation impacts throughout the SOR are greatly understated. The recreating and fishing public has abandoned Dworshak reservoir, for instance, for many reasons: They cannot depend on water levels; the experience is unsightly once drawdowns are begun; businesses are going broke and are no longer there to serve the recreationists. It seems the recreation impacts in the SOR were calculated somehow proportionate to the level of drawdowns. I believe the effects are worse; once drawdowns reach a certain point, recreation drops dramatically. I request you re-examine these impacts in the final SOR.

Thank you for this opportunity to comment.

MR. HUGH MOORE: Our next commentor is Lavern Bronco, followed by Richard Burleigh. We now have four commentors remaining.

MR. LAVERN BRONCO: My name is Lavern Bronco, the Sho-Ban tribe. In reviewing all this and looking at the bookwork, I see a big dollar sign in front of you guys' face. One question I want to know is how much are your children worth? How much are your children's children worth? Can you guys

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TBOI9-6

TBOI10-1

Responses

TBOI9-6. The Final EIS includes a complete reassessment of the recreation impacts, based on different methods than were used for the Draft EIS. Specifically, the Final EIS results are based on a survey of users of the projects that included questions concerning their response to lowered water levels. The SOR agencies are confident that the EIS reflects the best information available concerning recreation impacts.

TBOI10-1. The SOR agencies are making a good-faith effort to make decisions that reflect an appropriate long-term view, and that conserve and maintain the important resources of the river system. The identification of purposes and resource objectives for the SOR, which does not include maximizing dollar returns from revenue-generating activities, is an accurate statement.

Letter TBOI10 Comments

Responses

put a dollar sign on that? You sure in the hell put a lot of dollar signs on what's going on here. The water, the land, the trees, the fish have all got a dollar sign on it. What are your children worth?

We have all got to make sacrifices here. Sure that dollar's great. It's terrific, isn't it? But what are your children worth when there ain't nothing coming back? What happens when the trees are gone, when the water is gone, when the fish are gone? How are you going to stick a dollar value on that? We have all got to make sacrifices. Think of it, not put dollars in your pocket to see who's the big dog on the block. Think about your kids, your children's children, their children's children. You can put a value on that. That's a natural resource. That's value. That's something that your children can enjoy. You may not be here, but at least your children can say that you had a helping hand to bring something back instead of putting a dollar sign on it.

When you guys make these decisions on all this here, you have got to remember that this dollar sign is stuck in you guys' head now. When you guys start making these decisions, the first thing that's going to pop up is this damn dollar --

TBOI10-1

Letter TBOI10 Comments Responses

TBOI10-1

damn dollar. You guys are cherishing it. Get rid of that. When you guys make these decisions on things that's living like the fish and the trees, the rocks, the land, they are alive, how do you put a dollar value on something that's alive? Your children are alive. I am just waiting for someone to start sticking a dollar value on the children. But when you guys make these decisions, think with your heart, think about your children, their children and their children's children.

Right now there is something going on and I can tell right now that some of these children and children's children ain't going to see something that you have enjoyed. So if we just sacrifice what's out there, that dollar again, so we can bring back some natural resources for all of us. But think of your children first, their future. Is there a future? Thank you.

MR. HUGH MOORE: Our next commentor is Richard Burleigh and he will be followed by Phil Lansing.

MR. RICHARD BURLEIGH: My name is Richard Burleigh. I am an attorney with the law firm of Hawley Troxell Ennis & Hawley in Boise, Idaho. I am appearing today on behalf of the Boise Project Board

Letter TBOI11

Comments

of Control. The Boise Project Board of Control is the operating agency for five irrigation districts in this area. My comments are fairly short and sweet.

Primarily I would like to adopt in full the comments made by Mr. Chapman on behalf of the Idaho Water Users Association. And in doing that, I would like to stress the fact that while the Columbia River system may have once operated in a vacuum and could have proceeded with its planning in that vacuum, that is no longer the case today. And that is obvious with the overt reliance on the water out of the upper Snake River basin.

The complete lack of analysis on the economic impacts on the upper Snake River basin, the environmental impacts on the upper Snake River basin all are blatantly apparent from this document. They need to be addressed before the agencies involved in the selection process can make an honest interpretation of the information before them and analyze the best alternative available, whether it's one of the seven alternatives presently before the public or if it's an eighth or ninth alternative selected out of this process. Without the information as to the impacts on the upper Snake

TBOI11-1

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Responses

TBOI11-1. See Common Response No. 3.

Letter TBOI12

Comments

TBOI11-1

River, regardless of how those impacts shake out, it is impossible to make a decision. Thank you.

MR. HUGH MOORE: Our next commentor is Mr. Lansing, who will be followed by Mr. Boyer.

MR. PHIL LANSING: My name is Phil Lansing. I am an economist with the Northwest Resource Information Center headquartered in Eagle, Idaho.

I offer these brief comments on the Systems Operation Review, and NRIC will provide more detailed written comments prior to the close of the period.

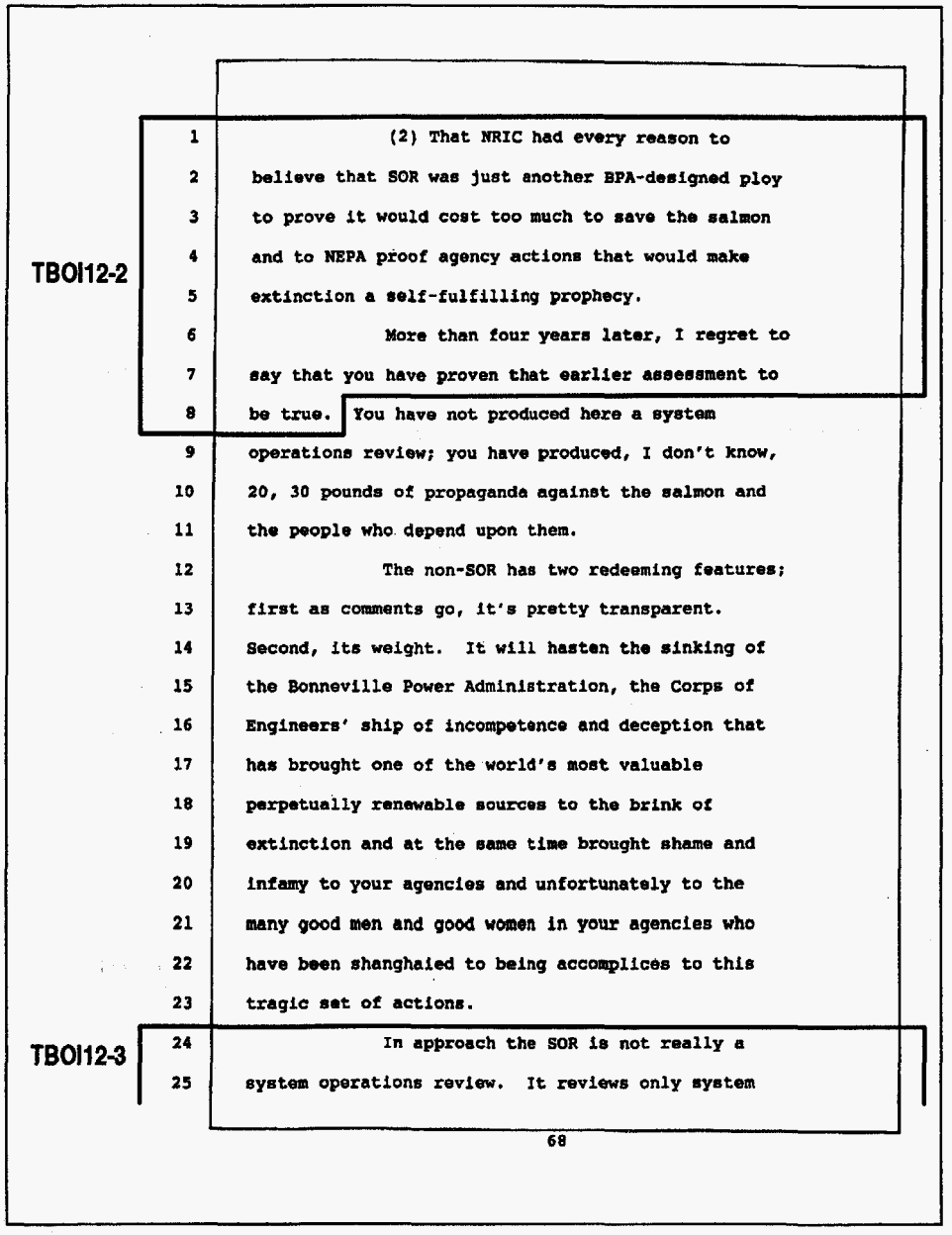
More than four years ago on 25 May 1990, NRIC director Ed Cheney met with Ed Sienkiewicz, who is the BPA senior assistant administrator, and Jim Luce, BPA general counsel, and John Palensky, BPA Fish and Wildlife Division manager, and the purpose of the meeting was to discuss the SOR. A follow-up meeting was held on 15 June of that year with BPA, Army Corps of Engineers and the Bureau of Reclamation team leaders. At both meetings NRIC expressed its views as: (1) The water and power agencies' actions were responsible for the depressed condition of upriver salmon runs and the pinched economies and that more of the same would guarantee the extinction of both.

TBOI12-1

Responses

TBOI12-1. The SOR agencies acknowledge these meetings and their content, but do not agree with the statements.

Letter TBOI12 Comments



(2) That NRIC had every reason to believe that SOR was just another BPA-designed ploy to prove it would cost too much to save the salmon and to NEPA proof agency actions that would make extinction a self-fulfilling prophecy.

TBOI12-2

More than four years later, I regret to say that you have proven that earlier assessment to be true. You have not produced here a system operations review; you have produced, I don't know, 20, 30 pounds of propaganda against the salmon and the people who depend upon them.

The non-SOR has two redeeming features; first as comments go, it's pretty transparent. Second, its weight. It will hasten the sinking of the Bonneville Power Administration, the Corps of Engineers' ship of incompetence and deception that has brought one of the world's most valuable perpetually renewable sources to the brink of extinction and at the same time brought shame and infamy to your agencies and unfortunately to the many good men and good women in your agencies who have been shanghaied to being accomplices to this tragic set of actions.

TBOI12-3

In approach the SOR is not really a system operations review. It reviews only system

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Responses

TBOI12-2. See Response TBOI12–1.

TBOI12-3. The SOR agencies disagree with this comment, and believe the SOR is consistent with the multiple purposes and objectives stated in the EIS.

Letter TBOI12 Comments

TBOI12-3

changes to protect or restore salmon. Even if that were done honestly, which it isn't, it would be a fool's errand out of context of all of the other demands on the system, including flood control, irrigation storage and withdrawals, waterway transportation, power production, load, marketing, sales, the Pacific Northwest Coordination Agreement and the Canadian Entitlement and so forth.

TBOI12-4

There are key assumptions that are basic to the SOR that are false on their faces. These include assumptions that drive Bonneville's CRISP model, which in the Corps' System Configuration Study is sort of the bastard stepchild of the SOR, hilariously predicts that endangered Snake River fall chinook would be harmed by restoring natural river conditions to the lower Snake River.

TBOI12-5

So SOR assumptions about the so-called benefits of barging salmon and the lack of benefits of spillway crest drawdowns are in our view no less less tortured and indefensible.

But it is in the so-called economic analysis that the non-Systems Operation Review reveals in full flower the unbridled ideological zeal of its preparers.

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Responses

TBOI12-4. All modeling assumptions are subject to debate and interpretation. The SOR agencies have reviewed the construction and assumptions for the CRiSP model and for the other passage models, and believe that CRiSP represents the best available scientific information.

TBOI12-5. See Common Response No. 4.

Letter TBOI12 Comments

Responses

TBOI12-6

To begin a general comment, it is implicit in the title Systems Operation Review that the economic effects of all system components be somehow equitably examined. An underlying and the flawed assumption in the actual document is that since the baseline current operations has been established, only salmon driven departures from baseline operations require examination. Thus salmon recovery is subject to a rigorous search for every conceivable cost. Thus the whole matrix of subsidy, boodle, diseconomy and plain economic inefficiencies which characterizes the system are ignored. By failing to examine the actual economic costs of the other key system outputs, the power, irrigation, water transport, flood control, the SOR fails at the outset in truly seeking economic optimization of the system. A more accurate title for the document would be a maximizing Putative Costs of Salmon Recovery While Ignoring Real Economic Consequences of Massive Subsidies.

I suppose as an aside, a good one that was ignored was the subsidy to the DSI, and I believe it's $350 million dollars to aluminum companies during this current year rate period.

Another general criticism of the SOR is

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TBOI12-6. See Response F4–7.

Letter TBOI12 Comments

Responses

TBOI12-7

that in drawing its conclusions, which really come down to what we are seeking, the number, finding the number of what recovery will cost, which is presented in tables at the end of Appendix O, the economic section, we make economic methodologic fallacies. We muddle -- or rather the SOR muddles agency budget impacts, economic opportunity cost and area economic impact. These three means of measurement are quite different. They are like apples and oranges and bananas. They may not be summed to a meaningful number and, of course, here they are summed and I found that interesting in the appendix. The document is thus seeking a cost of salmon recovery, but it is something that the methodology applied simply cannot yield up.

Now, we don't have time for me to go through an analysis of all nine different sections and kinds of costs, but I do want to touch on two; first, recreation, and then something more about irrigation.

The recreation section -- well, first off, it's a great example of developing a consumer surplus number and then summing that with a budget outlay and coming up with a number at the end of the document, which of course is as meaningless as

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TBOI12-7. The SOR agencies believe that the economic analysis presented in the Final EIS correctly and properly displays net national economic impacts, according to established Federal guidelines, and distinguishes national from regional impacts.

Letter TBOI12 Comments

Responses

TBOI12-8

apples and oranges. But internally aside from that broader problem, let's look at what really happens. First the SOR failed to create proper contingent recreation demand curves for change in projects. Average values were transferred instead and that's quite shaky. So we don't really know what recreation is worth. The above problem was compounded by failure to allow for substitutability of recreation use between the sites.

Recreation use changes were developed not by survey but by a kind of a strange use model where the key variable appears to have been reservoir height. High pools get high use; low pools get low use regardless of other important determinants like fishing quality for anglers, water temperature for swimmers. I made a chart of this -- I mean, you made so many charts in the SOR, the least I can do is give you a chart in return. I call it table one where I put together tables D-14 and D-32 and looked at some of the changes in recreation.

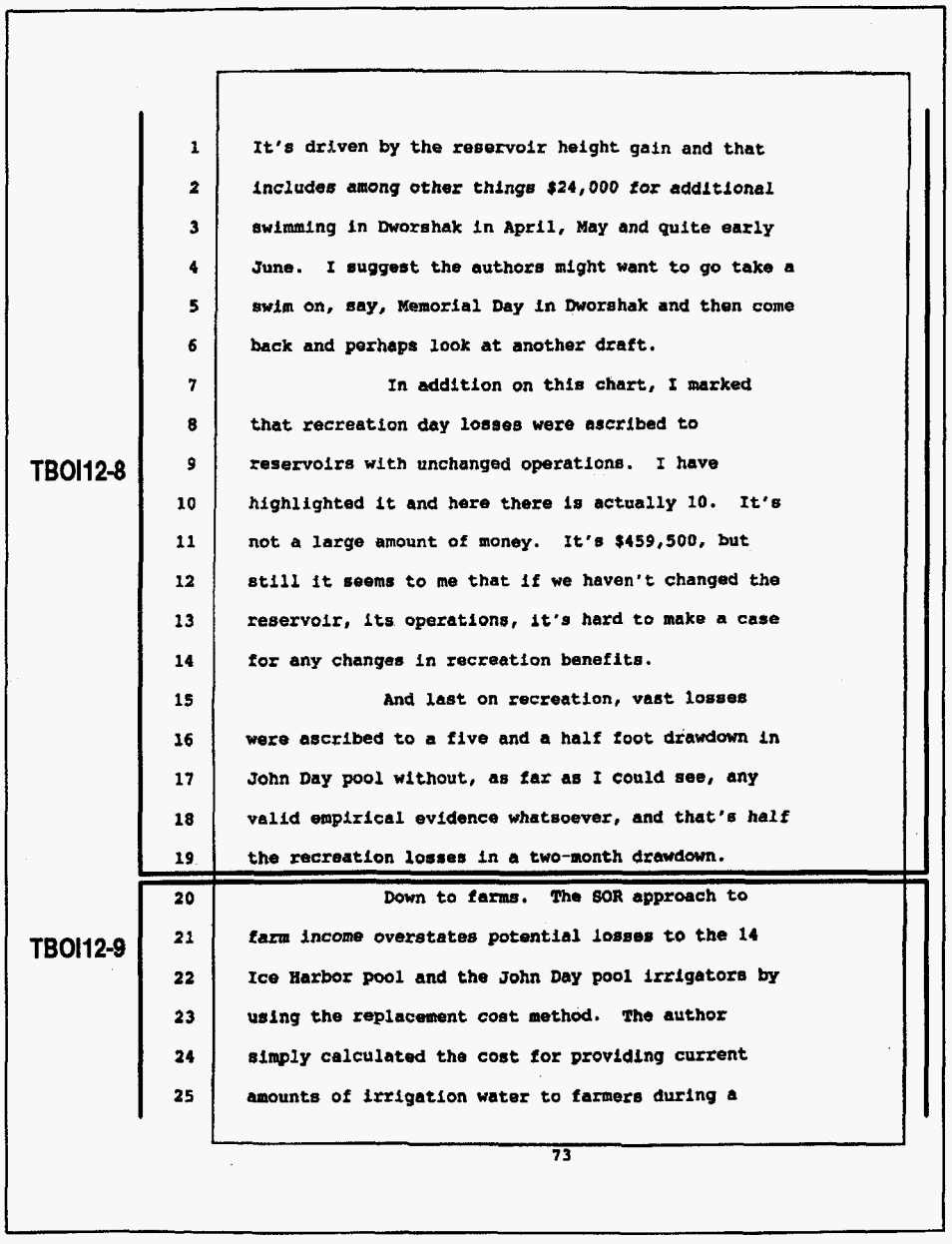
And one thing that is kind of interesting under a two-month drawdown with Dworshak held a bit higher in the spring, we get a recreational benefit, and I thought that's odd.

72

TBOI12-8. See Response TBOI9-6.

Letter TBOI12 Comments

Responses



It's driven by the reservoir height gain and that includes among other things $24,000 for additional swimming in Dworshak in April, May and quite early June. I suggest the authors might want to go take a swim on, say, Memorial Day in Dworshak and then come back and perhaps look at another draft.

In addition on this chart, I marked that recreation day losses were ascribed to reservoirs with unchanged operations. I have highlighted it and here there is actually 10. It's not a large amount of money. It's $459,500, but still it seems to me that if we haven't changed the reservoir, its operations, it's hard to make a case for any changes in recreation benefits.

And last on recreation, vast losses were ascribed to a five and a half foot drawdown in John Day pool without, as far as I could see, any valid empirical evidence whatsoever, and that's half the recreation losses in a two-month drawdown.

Down to farms. The SOR approach to farm income overstates potential losses to the 14 Ice Harbor pool and the John Day pool irrigators by using the replacement cost method. The author simply calculated the cost for providing current amounts of irrigation water to farmers during a

73

TBOI12-8

TBOI12-9

TBOI12-9. The irrigation impact analysis presented in the Final EIS has been significantly revised from the Draft EIS; it is based solely on changes in pumping costs, rather than changes in net farm income, as is explained in the document.

Letter TBOI12 Comments

Responses

TBOI12-9

drawdown. This is inappropriate since this assumed the farmers will make no efforts to change their irrigation habits if their pumping costs changed.

A more accurate method would be to look at changes in producer surplus; that is, changes in economic return to farmers due to changes in pumping costs. The method would assume that farmers would adjust their crop pattern irrigation management to minimize losses from the change.

So in sum, the approach in developing the SOR was wrong. You failed to review the system overall, reviewing the changes driven by salmon recovery only instead. There is a long series of examples that we could give in each section as I have in the irrigation and recreation sections of internal problems and a basic overall problem here that says to me that the conclusions in the document as evidenced by the number at the end, the costs, are simply not supported by the methods, let alone the data.

TBOI12-10

NRIC recommends that you let the SOR die a quiet ignominious death, just drop the whole enterprise, quit wasting the taxpayers' money and the ratepayers' money. The jig is up. The Federal courts have got your number. We gave it to them.

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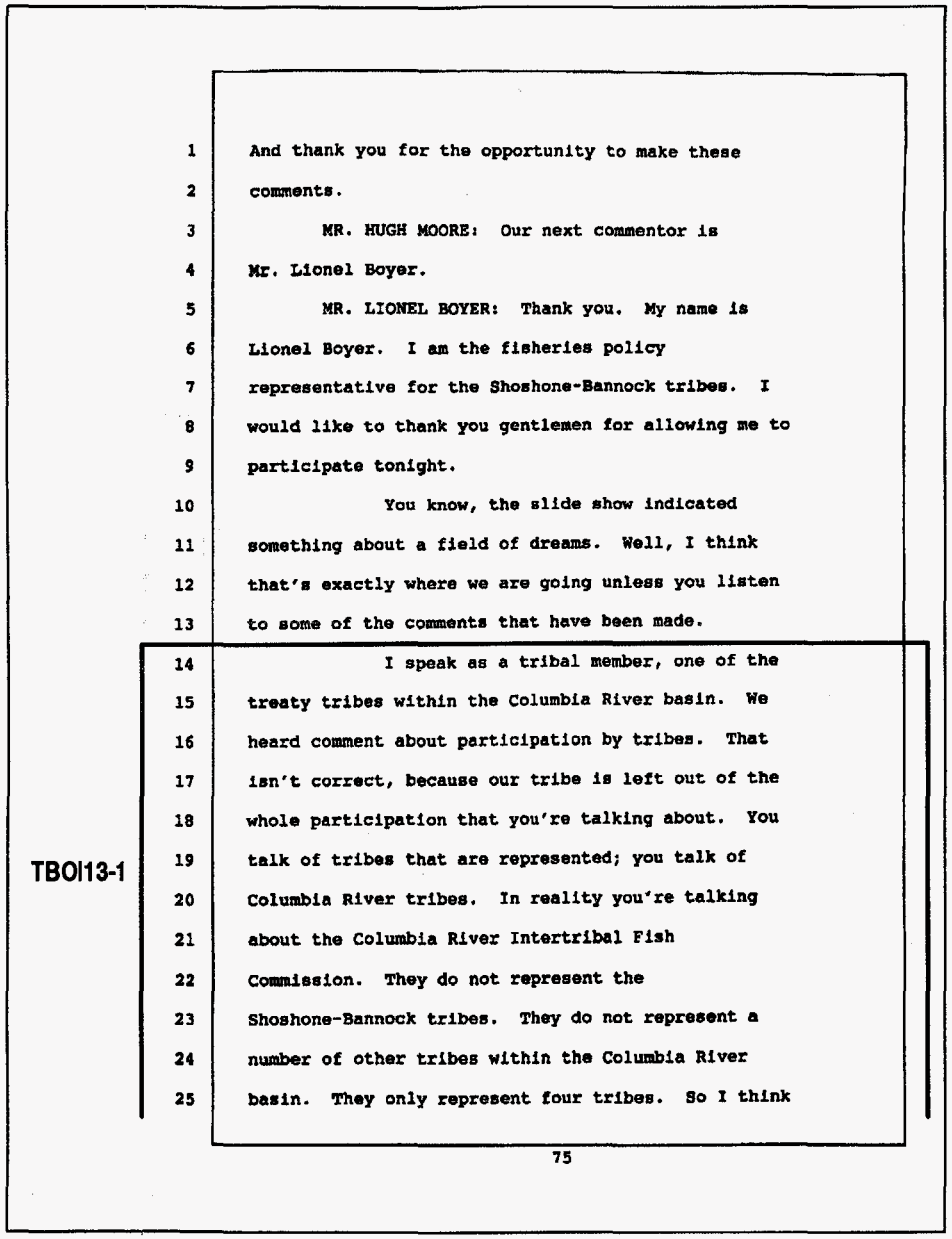
TBOI12-10. The SOR agencies elected to complete the process.

Letter TBOI13 Comments

Responses



And thank you for the opportunity to make these comments.

MR. HUGH MOORE: Our next commentor is Mr. Lionel Boyer.

MR. LIONEL BOYER: Thank you. My name is Lionel Boyer. I am the fisheries policy representative for the Shoshone-Bannock tribes. I would like to thank you gentlemen for allowing me to participate tonight.

You know, the slide show indicated something about a field of dreams. Well, I think that's exactly where we are going unless you listen to some of the comments that have been made.

I speak as a tribal member, one of the treaty tribes within the Columbia River basin. We heard comment about participation by tribes. That isn't correct, because our tribe is left out of the whole participation that you're talking about. You talk of tribes that are represented; you talk of Columbia River tribes. In reality you're talking about the Columbia River Intertribal Fish Commission. They do not represent the Shoshone-Bannock tribes. They do not represent a number of other tribes within the Columbia River basin. They only represent four tribes. So I think

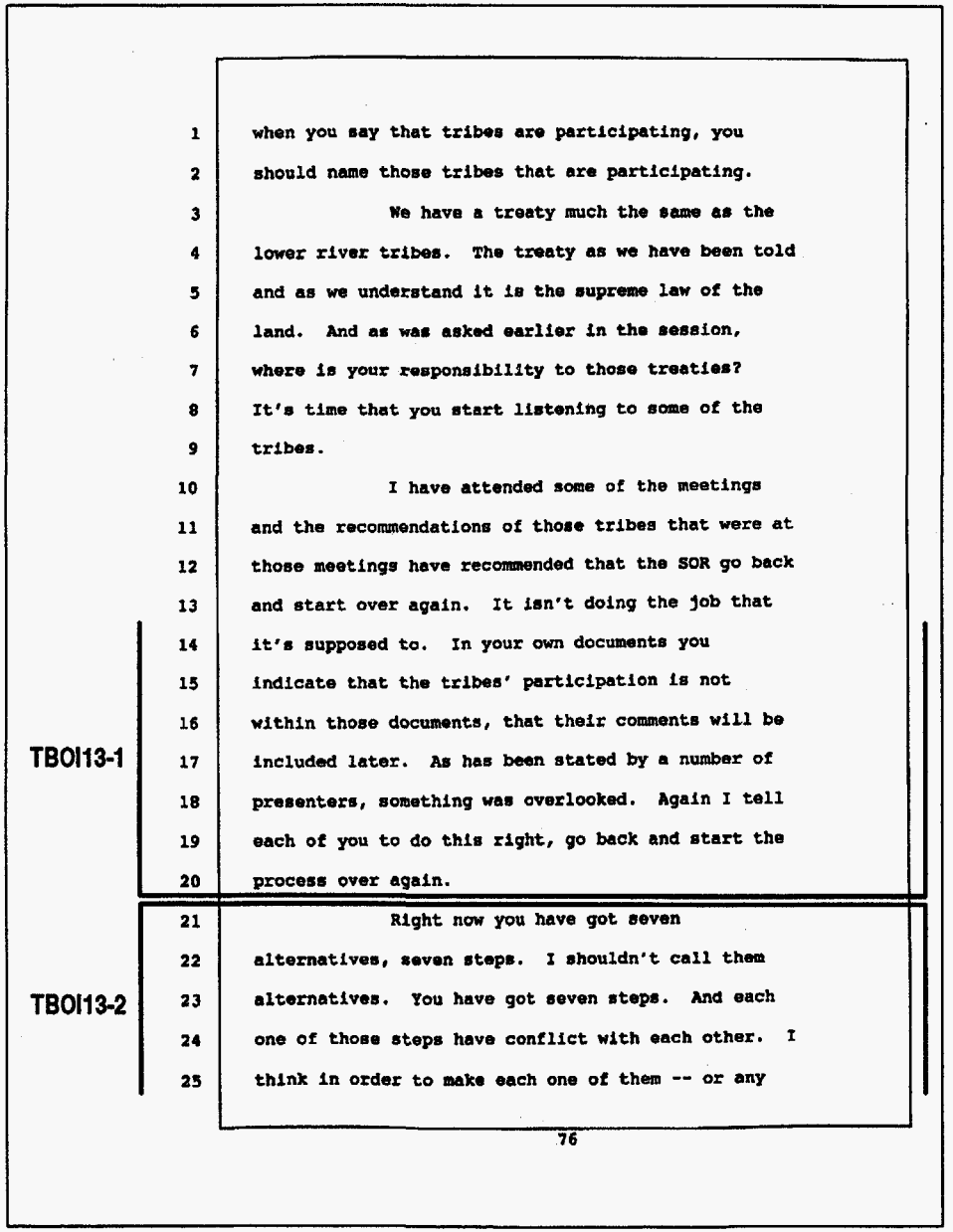
75

TBOI13-1

TBOI13-1. Sections 1.3.4 and 9.2 of the EIS Main Report accurately summarize tribal participation in the SOR, which has included more than just the four tribes represented by the CRITFC. See also Common Response No. 7.

Letter TBOI13 Comments

Responses



when you say that tribes are participating, you should name those tribes that are participating.

We have a treaty much the same as the lower river tribes. The treaty as we have been told and as we understand it is the supreme law of the land. And as was asked earlier in the session, where is your responsibility to those treaties? It's time that you start listening to some of the tribes.

I have attended some of the meetings and the recommendations of those tribes that were at those meetings have recommended that the SOR go back and start over again. It isn't doing the job that it's supposed to. In your own documents you indicate that the tribes' participation is not within those documents, that their comments will be included later. As has been stated by a number of presenters, something was overlooked. Again I tell each of you to do this right, go back and start the process over again.

TBOI13-1

Right now you have got seven alternatives, seven steps. I shouldn't call them alternatives. You have got seven steps. And each one of those steps have conflict with each other. I think in order to make each one of them -- or any

TBOI13-2

76

TBOI13-2. See Common Response No. 2.

Letter TBOI13

Comments

TBOI13-2

one of them do the job that you're looking for, you have to start it over.

TBOI13-3

Listen to the comments of the people here. We heard the gentleman talk about a conduit for the fish. Well, instead of a conduit for the fish, why not a pipeline for those transformers. Let the river be itself. As was said earlier, there should be more alternatives. I think one of those alternatives should be to let the river be natural.

TBOI13-4

We heard talk about low cost power and then we think about the millions of dollars that was used to build those dams. For what? To create low cost power, but it also created a problem that's going to cost billions of dollars. We heard a lot about those figures here tonight. We heard talk of a coordination agreement. In that agreement does it indicate that the treaties were part of that agreement? We heard about resident fish. What were resident fish before the dams? Did they have problems then? We heard about cultural resources and as was indicated, we as Indian people consider everything that's on this mother earth as part of our culture; the land, the water, the air, the plants, the animals. Where is the SOR considering all these resources?

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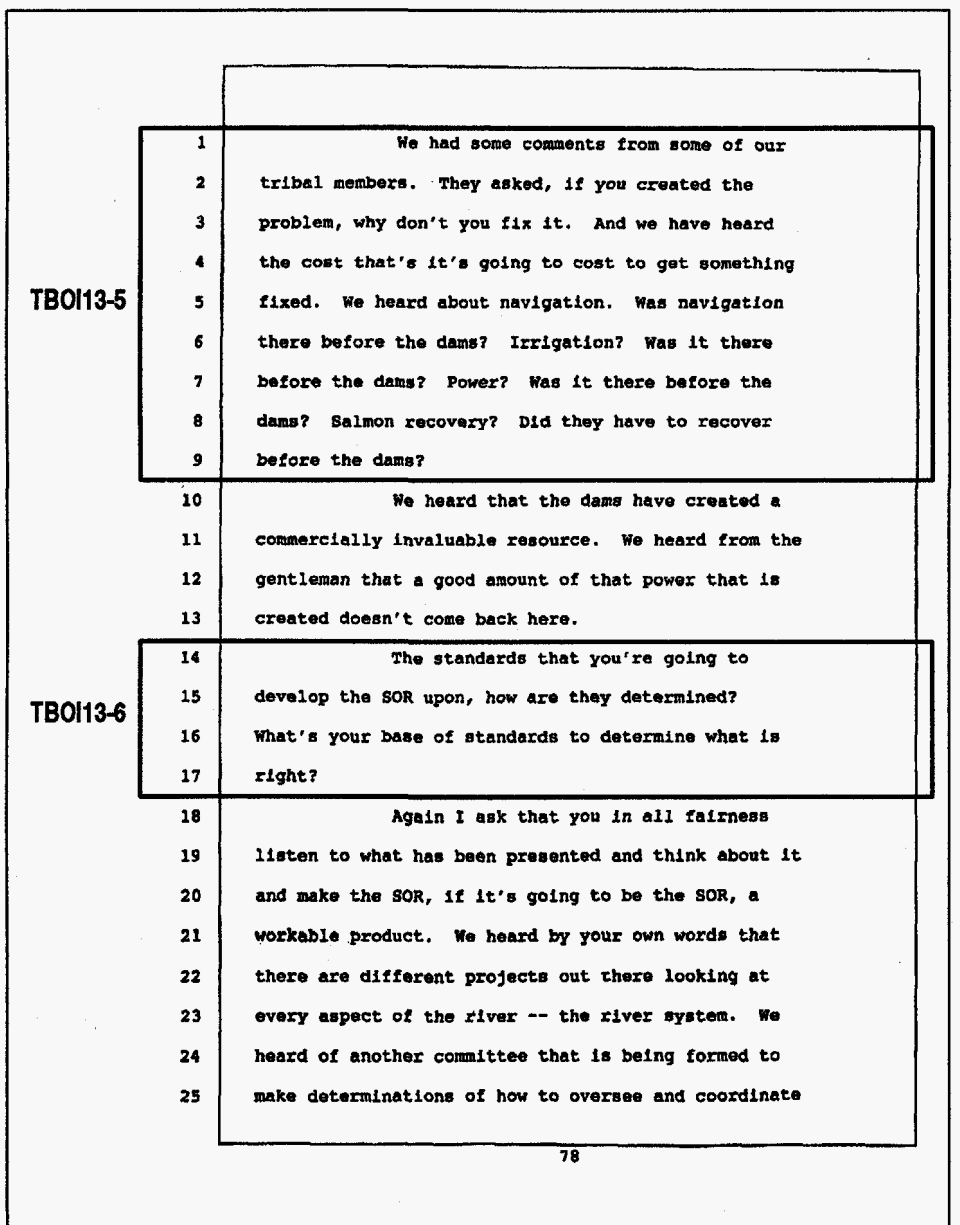
Responses

TBOI13-3. Without more specific information, we cannot address the pipeline concept referenced in the comment. The EIS does evaluate a natural river operation among the SOS alternatives.

TBOI13-4. All of the resources mentioned in the comment are addressed in the EIS impact analysis under the corresponding headings. In addition, the material on cultural resources and Native American resources and concerns discusses how the Indian people consider everything on the earth to be a part of their culture.

Letter TBOI13

Comments



TBOI13-5

We had some comments from some of our tribal members. They asked, if *you* created the problem, why don't you fix it. And we have heard the cost that's it's going to cost to get something fixed. We heard about navigation. Was navigation there before the dams? Irrigation? Was it there before the dams? Power? Was it there before the dams? Salmon recovery? Did they have to recover before the dams?

We heard that the dams have created a commercially invaluable resource. We heard from the gentleman that a good amount of that power that is created doesn't come back here.

TBOI13-6

The standards that you're going to develop the SOR upon, how are they determined? What's your base of standards to determine what is right?

Again I ask that you in all fairness listen to what has been presented and think about it and make the SOR, if it's going to be the SOR, a workable product. We heard by your own words that there are different projects out there looking at every aspect of the river -- the river system. We heard of another committee that is being formed to make determinations of how to oversee and coordinate

78

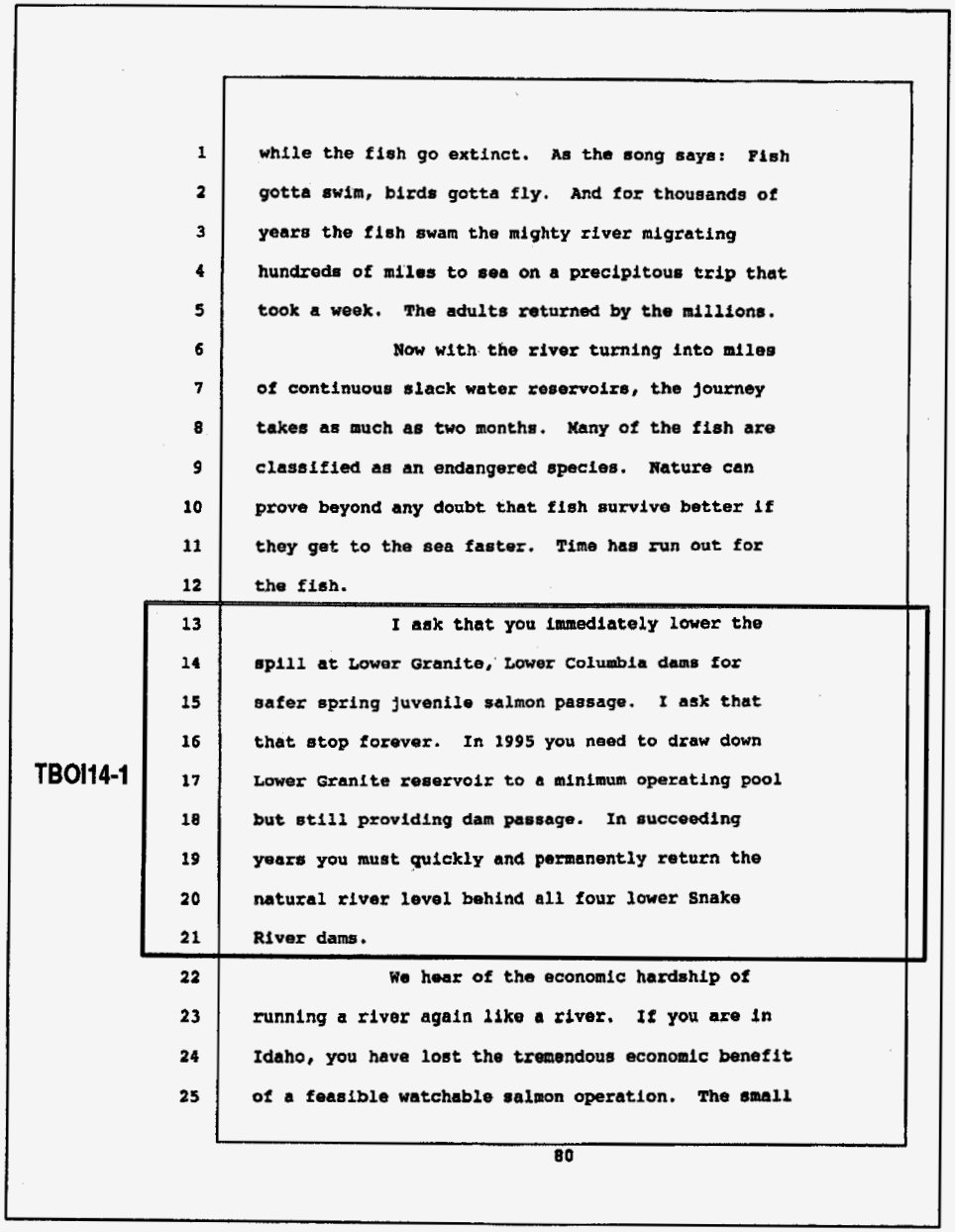
Responses

TBOI13-5. As indicated at several locations in the EIS, much of the focus of the SOR is on attempting to improve conditions within the river system for anadromous fish.

TBOI13-6. The decision process and criteria for the SOR actions are described in Chapter 8 of the EIS Main Report.

Letter TBOI14 Comments

Responses



while the fish go extinct. As the song says: Fish gotta swim, birds gotta fly. And for thousands of years the fish swam the mighty river migrating hundreds of miles to sea on a precipitous trip that took a week. The adults returned by the millions.

Now with the river turning into miles of continuous slack water reservoirs, the journey takes as much as two months. Many of the fish are classified as an endangered species. Nature can prove beyond any doubt that fish survive better if they get to the sea faster. Time has run out for the fish.

TBOI14-1

I ask that you immediately lower the spill at Lower Granite, Lower Columbia dams for safer spring juvenile salmon passage. I ask that that stop forever. In 1995 you need to draw down Lower Granite reservoir to a minimum operating pool but still providing dam passage. In succeeding years you must quickly and permanently return the natural river level behind all four lower Snake River dams.

We hear of the economic hardship of running a river again like a river. If you are in Idaho, you have lost the tremendous economic benefit of a feasible watchable salmon operation. The small

80

TBOI14-1. As specified in the NMFS 1995 Biological Opinion, which has been incorporated into the preferred SOS alternative, decisions on short-term operations such as spill are made by a multi-agency Technical Management Team. Lower Granite and the other lower Snake River projects were operated near MOP in 1995. Implementation of a natural river operation would require many years to modify the project structures, as indicated in the EIS analysis.

TBOI15-1

given a copy of a newspaper by the Pacific Northwest Waterways Association and it drew my attention to a major article in it that basically says there is problems with the nav locks at Ice Harbor. The people involved in that are very concerned about it not holding up. It asks, for example, that this lock gate should be replaced sooner than 1996, which apparently is the date that the Corps of Engineers is trying to get funding for, and they are asking for an acceleration.

I was a little bit surprised going back to another article and it mentioned similar types of lock concerns . . . (inaudible). The question I guess I have around that, to me being a fish person, that seems like that could be pretty major stuff. It could cost a few dollars to accomplish that; lock replacement versus maintenance and repair. I guess I am interested in how big would that type of gate replacement be and how would something that major fit into the economic assessments as we are doing business or pre-ESA. Help us clarify the economics a little bit.

MR. WITT ANDERSON: I don't know that we have anybody here that knows specifically the answer in terms of costs for fixing the Ice Harbor nav lock.

13

TBOI15-1. Actions such as repairing or replacing the navigation lock at Ice Harbor (or any other Federal dam with locks) are funded through the annual Congressional appropriations process. Such actions are completely separate from and outside the scope of the SOR, and do not have a bearing on the economic impact analysis for the SOR.

N. DAVID HOWELL, C.S.R.

DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
COLUMBIA RIVER SYSTEM OPERATION REVIEW

P U B L I C H E A R I N G

Taken at: Lewiston, Idaho
Date Reported: 9-27-94

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INDEX TO SPEAKERS

DAVID P. STATLER: I have a prepared statement. Is this working?

I have a prepared statement. I have to read fast here. In three minutes I don't know if I can do this.

My name is David P. Statler. I'm a certified fishery scientist, a member of American fishery society parent organization, and also a member of the Idaho Chapter of American fisheries society. On behalf of the Idaho chapter of the American fisheries society I would provide excerpts from our water quantity position statement adopted February twenty-fourth, 1994.

TLWS1-1

The American fishery society is both an international professional and scientific organization. More than nine thousand two hundred fishery members and fishery scientists. Founded in eighteen seventy-nine the American Fishery Society is the world's oldest and largest organization dedicated to conservative fisheries resources. Advancing fishery science and strengthening the fishery profession. The Idaho chapter is a -- of the American Fishery Society in connection with societies in general throughout Idaho.

This position statement has been adopted by

TLWS1-1. Thank you for your comment. Please see Response O52–1. In general, the position statement addresses water rights and related matters that are beyond the jurisdiction of the SOR agencies.

the Idaho Chapter of the American fisheries Society in furtherance of our mission to advance the conservation and wise use of fishery resources for the use in general of all humanity.

The position of the Idaho chapter of American fishery Society is to promote equal consideration of fisheries resources, with other water uses in the management of water resources in the administration of state and federal water law. In furtherance of our position the Idaho Chapter of the American Fishery Society recommends that federal and state water managers use their respective authorities and responsibilities to implement the following actions.

TLWS1-1

Promote water conservation, through the most efficient water conveyance and application facilities. To be sure that water savings from efficiency improvements are dedicated to restoring stream flows. To require measuring devices on all water diversions and wells, monitor unauthorized or excessive withdrawal of surface and ground water and to discourage illegal activities through vigorous enforcement penalties.

Establish positions within the Idaho department of water resources for water deficiency corridors and for water law enforcement officers.

STEVE JUDY: My name's Steve Judy. I'm a natural resource field representative for Senator Kempthorne. I'm here to read a statement that the Senator wrote for this evening.

I appreciate the opportunity to submit my views of this hearing and commend the Corps of Engineers, the Bonneville Power Administration, and the Bureau Of Reclamation for conducting this hearing and the one at Boise last night. We cannot over estimate the impact that the Columbia System Operation Review and the decisions that flow from it will have on Idaho communities and others in the Pacific northwest. We are now making a huge investment and in some cases like Orofino a tremendous sacrifice to save the salmon. Additional sacrifices may be forthcoming, and the magnitude of those sacrifices will be affected by the preferred alternative selected at the end of this process.

TLWS2-1

When the preferred alternative is selected it must meet two criteria. First, the preferred alternative must benefit Salmon recovery. And that benefit must be supported by sound scientific data. The benefit must be more than marginal and there must be persuasive evidence to support the conclusion. Given the cost to everyone involved the

TLWS2-1. Thank you for your comment. The SOR agencies agree with these decision criteria.

federal government cannot afford to pick an approach not fully justified by more than inconclusive scientific data.

Second, the preferred alternative must take into account its economic and social impact. I firmly support the Salmon recovery effort. I believe the Salmon are an important part of Idaho's heritage, our natural resource base and our ecosystem. But so are our rural communities and the people who live and work in them. When one

TLWS2-2

alternative for management of the Columbia River system projects an eight point six million dollar drop in net farm income, a decrease in recreation benefits seventeen million dollars or a seventeen percent to twenty percent decrease in recreation benefits -- excuse me -- in wholesale power rates, that price seems wholely unacceptable when other alternatives achieve equal or more Salmon survival benefit with lesser economic impact.

I was impressed by the clear indication provided by the system review about the effectiveness of transportation for salmon survival. This conclusion is significant although it will not be popular in some quarters.

Finally I am still concerned and still some

TLWS2-2. Thank you for your comment. These factors have been considered.

believe water is the solution. Whether it be increased flows or drawdowns. While the aquatic environment for Salmon spawning and rearing and migration is essential, there are other problems in the Salmon life cycle that may have a more significant impact today for Salmon survival.

Marine mammal predation, ocean conditions both temperature and food supply and harvest levels protected by international treaties. These effects will not and cannot be addressed by the Columbia River system operation review. At the same time, however, is unrealistic to expect that changing the operation of the Columbia River System alone will achieve Salmon recovery and over come the problems presented in other phases of the Salmon life cycle.

TLWS2-3

I appreciate the opportunity to testify and urge the Corps of Engineers and other federal agencies represented to listen carefully to the views expressed here tonight. Thank you.

HUGH MOORE: We have sixteen commenters remaining.

Next is Ray Thayer who will be followed by Tom Hutchinson.

TLWS2-3. Thank you for your comment.

Letter TLWS3 Comments

Responses

by the best scientific knowledge and utilized where equally effective means of achieving the same biological objective exists, the alternative with the minimum costs.

This sensible provision of the Northwest Power Act eliminates any option that includes drawdowns, dramatic flow augmentations or spills, because they are not based on sound scientific knowledge.

For this reason Clearwater Power Company supports the Columbia River Alliance's strategy known as recover one which includes,

Number one improving and enhancing the effectiveness of the juvenile barging program.

Number two, installing surface collectors at Lower Granite Dam.

Number three, reducing flow augmentation to the original water budget.

The recover one strategy that we support is not inexpensive. An estimated thirty-six million dollars. However it is based on good scientific evidence and will benefit the Salmon runs.

Now, two special thoughts for our lawmakers in Washington, D.C..

First the Endangered Species Act is being

TLWS3-1

TLWS3-1. See Common Response No. 11.

Letter TLWS3

Comments

please sir?

RAY THAYER: You bet. Your own recovery team does not advocate drawdowns so why are we here tonight talking about options that include drawdowns?

I'm going to skip about half of this.

TLWS3-2 Clearwater Power Company opposes drawdowns in high river flows. We oppose any more dramatic spills. We are for improved barging and we are for leaving the river management agencies in charge of river operations. That's the U.S. Corps of Engineers, the Bonneville Power Administration and the Bureau of Reclamation. They are the experts on river operations. Certainly not Judge Marsh.

And now in collusion. Clearwater Power Company is sick and tired of seeing good scientific information ignored when making multi million dollar decisions in efforts to save the Salmon. These decisions are wasting taxpayers money, they are damaging the Salmon run. They are killing other fish and wildlife such as Kokanee.

We feel that over a million dollars per fish that has been spent without good scientific basis is absolutely rediculous and Clearwater Power Company will continue to try to stop this foolishness in any

Responses

TLWS3-2. Thank you for your comment.

TLWS3-3. See Common Response No. 4.

TLWS3-4. Thank you for your comment.

Letter TLWS4

Comments

TLWS4-1

TOM HUTCHINSON: I'm Tom Hutchinson. I'm also with Clearwater Power as a director. But I'm a dry land grain farmer and I want to address this issue from that side. As a dry land grain farmer I have to participate in a conservation compliance program that basically forces me to prevent siltation from leaving my private property entering streams and siltation of rivers.

The travesty of this Dwarshak spill this year with one hundred ten feet of a drop exposes one hundred sixty-four million square feet of the most critical habitat and silt and possible siltation of the -- of the Clearwater, Snake and Columbia Rivers that is going to be more destructive to these fish than anything that's ever happened in the past.

When the fall rains hit, these poor fall Chinook that are threatened now will be endangered have to swim upstream in merk. The steelhead also a problem here are going to have to swim up in that same merk.

TLWS4-1

There seems to be a double standard here. The federal government under these agencies does not have to protect exposed habitat. As a private land owner I do. It's a crime if I let my land go down the river, but somehow the Army Corps of Engineers

Responses

TLWS4-1. The SOR agencies have considered the advantages and disadvantages of alternative operations measures, including the risks from sedimentation created by reservoir operations.

Letter TLWS4 Comments

Responses

can let this amount of mud seep into our river system causes future damage down here for removing the siltation.

Another point, to leave that, was in the May meeting I came here and I saw a plan that looked like a good viable option and it was a transportation and barging plan with a collection facility down here below Lewiston and above Lower Granite Dam. That facility and that plan in the statement seemed to have some real viable alternatives over drawdowns.

It seems that through political correctness that this group has opted to throw that out of all of the options and I think that barging and collection and transportation of Salmon has proven successful. The science shows that. The science does not show that drawdowns are successful.

In conclusion, I support the Columbia River Alliance recovery one plan, also, because it includes collection facilities. Thank you.

HUGH MOORE: We have fourteen commenters remaining. Next is Mr. Bramer who will be followed by "V" James Wilson.

TLWS4-1 **TLWS4-2** **TLWS4-2**

TLWS4-2. See Common Response No. 11.

Letter TLWS5

Comments

GEORGE BRAMER: My name is George Bramer. I live and farm in Nez Perce County.

TLWS5-1 First of all I would like to say that I don't think there is any good solution to this problem as long as the Endangered Species Act is left intact as it is. It has to either be repealed or modified so that there is some common sense put into it.

TLWS5-2 The other thing I would like to say is I agree with Tom and with Mr. Thayer that I believe the "C" "R" "A" recovery act -- excuse me -- is the best solution to the problem with -- even though it's not good, it's the best so far proposed.

Thank you.

HUGH MOORE: Next is Mr. Wilson and he will be followed by Mr. -- I think it's Broan? Is it Rou Brown. Ron Bower. Okay. Go ahead.

Responses

TLWS5-1. Thank you for your comment. The SOR agencies have no jurisdiction over the provisions of the ESA.

TLWS5-2. See Common Response No. 11.

Letter TLWS6 Comments

JIM WILSON: Okay. I'm Jim Wilson. I'm chairman of the Clearwater County commissioners.

First off, the Clearwater County commissioners must strongly and I repeat strongly protest your neglect to schedule a hearing on the operations of Dwarshak Dam in Orofino, Idaho.

This community and surrounding area has been bearing the burden of your attempt to save the Salmon. The failure to schedule Orofino as a site for a hearing cannot be condoned. The Clearwater County comprehensive plan shows the value of Dwarshak reservoir to the citizens of our area. Your failure to follow federal law let alone our comprehensive plan shows your contempt for the legal process.

TLWS6-1

We feel you must schedule a public hearing for Clearwater County in the Orofino area and not just an informational meeting as you have been conducting in the past. Testimony must be received to even begin to comply with federal law and Clearwater county's comprehensive plan.

Now, for the interagency team. The Clearwater County commissioners have reviewed the Columbia River systems operation review draft and will offer these following comments.

Responses

TLWS6-1. Your objection is noted. Given the available time and resources, the SOR agencies felt that a meeting in Lewiston would provide sufficient opportunity for residents near the Dworshak project to air their views. The extended period allowed for written comments also increased the opportunities to comment for those who could not attend one of the public meetings.

Letter TLWS6

Comments

TLWS6-2

Systems operation strategy SOS one is recommended and I think that SOS is probably appropriate. You fellows need all the help you can get.

This strategy would return operations to what existed prior to the Northwest Power Act. Your conclusions show this option costing a hundred twenty to a hundred seventy-nine million dollars less per year than the current strategy SOS two. With no significant impact to juvenile salmon survival or adult escapement. This option restores Dwarshak reservoir as a useful recreation resource which is worth over one point five million dollars annually in business to this small community.

Based on the Kokanee Salmon mortality during the Dwarshak drawdown of 1994 this option probably is most beneficial for the resident fish.

TLWS6-3

Barging of juvenile Salmon results in the highest survival rate and largest fraction of returning fish. This enormously successful program should be expanded to capture more fish. From a practical point of view this seems to be the only viable option for restoration of the Snake River Salmon population.

TLWS6-4

More research for improvements to the dam

Responses

TLWS6-2. Thank you for your comment.

TLWS6-3. See Common Response No. 4.

TLWS6-4. Thank you for your comment. Considerable additional research of this nature is programmed or proposed.

Letter TLWS6

Comments

that can enhance survival of migrating juvenile Salmon and returning adults should be conducted. Research should target changes that can be made without congressional approval and delays and many years of implementation. **TLWS6-4**

It seems credible that the National Marine Fishery Service and U.S. fish and wildlife service would propose a strategy like SOS seven. This being the most expensive three hundred thirty-seven to four hundred ninety-three million dollars per year of all the strategies being considered and results in no increase and in some cases a decrease in salmon survival over a return to SOS one. There seems to be a high value placed on hunches and unsupported opinions in the offices of the U.S. Fish and Wildlife Service, NMFS, and Northwest Power Planning Council. And a reckless eagerness to follow them know matter what the cost.

The decision to not recommend a specific strategy was a good one and for once there is at least an appearance that public comment is welcome. It is not clear however how the appropriate operating strategy will ultimately be selected. Because of the potentially devastating impacts to our region resulting from selection of a new **TLWS6-5**

Responses

TLWS6-5. Thank you for your comment. As discussed in Chapter 5 of the Final EIS Main Report, the SOR agencies concluded that this was not an appropriate time to attempt to establish a new regional forum.

Letter TLWS6

Comments

Responses

TLWS6-5

operating strategy for the Snake and Columbia River systems we suggest that a group representing stake holders be formed to recommend a strategy based on concensus.

The stake shoulders group should have --

HUGH MOORE: I'm sorry, sir. Your time is up. You have gone almost a minute over.

TLWS6-6

JAMES WILSON: Okay. Also you guys have got to be aware that under forty code of regulations fifteen 0 eight twenty "E" you have to mitigate for damages. That's not an option available to you. You have to mitigate and it has to come out of your operations budget and you will be challenged in court for failure to mitigate.

HUGH MOORE: We have twelve commenters remaining. Next is Ron Bower. He will be followed by David and I'm not sure if it's Doeringsfeld? Have I got that right? Okay.

TLWS6-6. Your comment is noted.

TLWS7-1

be six thousand pages of mirrors. It makes sense and I recommend the recovery one plan.

HUGH MOORE: Next is Mr. Doeringsfeld who'll be followed by Jim Raddell.

TLWS7-1. See Common Response No. 11.

Letter TLWS8 Comments

DAVID DOERINGSFELD: My name is David Doeringsfeld. I'm the manager of the Port of Lewiston. The following summarizes the port of Lewiston's policies and comments regarding the Columbia River system operation review draft environmental impact statement.

The seven system operations strategies identified in the draft SOR are inadequate to provide salmon recovery and the needs of multiple use river system. The port of Lewiston recommends that the Corps eliminate for further analysis any measure that would substantially jeopardize the multi purpose use of the Columbia Snake River system. The multipurpose use principle, and authorization underlying the system is a legitimate use of the nature resources and is as valid today as when the projects were first developed.

TLWS8-1

The Port of Lewiston supports the actions proposed under CRA's strategy called Recovery one. The recover one strategy is founded on solid technical analysis of biological and economic effectiveness, and is fully consistent with the objectives of the Northwest Power Act, the Endangered Species Act, and the Snake River Salmon Recovery Plan.

Responses

TLWS8-1. See Common Response No. 11.

Key elements of the Recovery one strategy include:

The Corps of Engineers, Bonneville Power and Bureau of Reclamation must retain their management role of the Columbia and Snake River System. River management agencies must remain in charge and remember the purpose of the system authorized by Congres was to provide multipurpose benefits to the public.

Number two. Reservoir drawdown options have been shown to be ineffective in light of the NMFS and University of Washington study on the survival of juvenile Salmon through Lower Granite Reservoir Dam.

TLWS8-1

To quote the final paragraph of the August fifth, 1994 memo to Gary Smith at NMFS concerning the two year study, I quote: In summary the results of our juvenile study indicate that little or no improvement in survival of juvenile salmon throughout the Lower Granite Reservoir will result from drawdown of the reservoir. End quote.

The NMFS U of Dub study provides the most recent and best scientific evidence that drawdowns are not a viable salmon method and should be eliminate from further consideration in the SOR.

Number three. The federal operators and NMFS should proceed immediately with the implementation of a smolt surface collection facility at Lower Granite Dam to work in conjunction with improved smolt transportation system. The juvenile transportation program should be improved by adding more barges and changing the smolt release site.

TLWS8-1

Number four. High level flow strategies from the Columbia Snake River System should be immediately eliminated. This would include limited flows from the Snake River system of approximately one point five million acre feet of spring flows and elimination of flow augmentation from the lower -- excuse me -- from the Columbia River System above the pre ESA water budget three point four five million acre feet.

Last week I attended a tour of water reservoirs on the upper Snake River with the Idaho water users association. The reservoirs are in their lowest levels on record for this time of year. Even with normal precipitation this winter the reservoir system has no chance of refilling.

Locally Dwarshak Dam provided over two million acre feet of water this year for salmon recovery and it's at its lowest level every.

Letter TLWS8

Comments

TLWS8-1

Idaho water has been sucked dry and cannot provide these high levels of flow augmentation. Only moderate flow augmentation above pre ESA water budgets should be pursued and only when flows benefits directly enhance the effectiveness of juvenile salmon transportation program.

HUGH MOORE: Can you wrap it up in just a few moments?

DAVID DOERINGSFELD: I would like to make a technical comment regarding the SOR. The SOR analyzes the environmental impact of each of the seven alternative strategies. It is my understanding that the SOR considers the utilization of South Idaho water as only one pool. We believe that this is wrong and that an EIS should be completed on each of the upper Snake River

TLWS8-2

reservoirs which would be utilized to supply water for high flow augmentation. The affect of high flow augmentation impacts the various upper Snake Reservoirs to different degrees. The SOR does not consider the utilization of upper river reservoirs as one big glut of water, but must be broken down to the impact on each individual reservoir.

The port of Lewiston supports the comments made by Sherl Chapman with the Idaho Water Users

Responses

TLWS8-2. See Common Response No. 3. Reclamation has begun a study of the upper Snake River Basin.

Letter TLWS9

Comments

JIM WADDEL: My name is Jim Waddel. I manage three river port sites on the Snake River. The Port of Wilma, the Port of Central Ferry, the Port of Almoda, and I manage Boyer Park and recreation area right below Lower Granite Dam.

I have three comments to make. Two of them have to do with tonight's proceedings and one is in regard to your SOR.

TLWS9-1

It seems unfortunate that you have asked people to come and be good citizens to participate in a process and that you -- and ask them on some occasions to come a great distance and then without warning you would limit them to three minutes when they have taken their time to prepare detailed comments.

I yield a good part of my time to those folks.

TLWS9-2

The second point is -- has been raised by several people here tonight. Again you asked us to be good citizens to participate in a process and we have dutifully come out to do that, but it occurs to several of us that perhaps we shouldn't be playing in this game. That perhaps it is a meaningless exercise and that perhaps we should in fact step outside the process and take to some some other

Responses

TLWS9-1. The SOR agencies regret the need to limit the time available to individual speakers. The agencies hope that public meeting attendees understood that this was done to ensure that all who wished to testify could deliver their comments without waiting many hours to do so. As indicated at the meetings, written comments were encouraged for lengthy input.

TLWS9-2. The SOR agencies believe that the effort we have put into providing opportunity for public comment and seriously considering that comment demonstrates that this was not a meaningless exercise.

Letter TLWS9

Comments

Responses

forum.

TLWS9-3

The final comment is that in your SOR it appears that you have identified that the closest option to a natural river condition that would make any sense would cost a great amount of money and would take a great deal of time to implement and would in fact provide very modest, if any, benefit over the current transportation program. It seems like that would indicate that we ought to stop that kind of discussion. That we should move on with things that we can do and implement rapidly and economically, get on with the business of running the river system as a multiple use facility and do our best to do what we can to the fish.

Thank you.

HUGH MOORE: Next is Gary Wattson who will be followed by Ron McMurray.

TLWS9-3. Thank you for your comment.

Letter TLWS10 Comments

Responses

GARY WATTSON: My names Gary Wattson and I'm a river boat operator here in the Lewiston area. And it seems like all I do is go to meetings anymore. Seems like we get up to participate, we give testimony, and we find out it always goes the other way. And I'm not -- I'm kind of agreeing with what this last gentleman said. I -- it's confusing.

It seems like all we're asked to do is contribute and then our taxpayers are going to pay the rest of it.

Anyway, science has not been proven that drawdowns are going to help the Salmon River -- the Salmon in the river. And barging has been shown, I can remember fifteen, twenty years ago we didn't even have steelheading or Salmon here. It has started coming back, but we want to disregard the fact that it's working and we want to try to eliminate the dams that now are -- our tax dollars have paid for and we're starting to get some benefit and everyone agrees to that, but maybe we can run up the cost. If we don't get rid of them maybe we can run up the cost. It's going to cost us more for our power anyway. It seems like all we're really asked to do is just keep paying. As a taxpayer and a businessman, I'm tired of paying. I'd like to start

TLWS10-1. The EIS presents the SOR agencies' analytical evaluation of salmon survival under drawdown operations.

TLWS10-2. See Common Response No. 4.

Letter TLWS11 Comments

Responses

TLWS11-1

percent consensus of all of these options of these interested people is that none, and I repeat, none of the operations that you have suggested will help bring back Salmon to the waters of Idaho to the extent that we feel is possible.

We feel that some of the options are very negative for Salmon. We feel that some of the options are very negative on the resident fish and very negative on people.

Our natural resource jobs and our water are totally dependent on each other. Idaho water is absolutely critical to the economic health of Idaho families. And Idaho water is absolutely critical to the life of our Idaho Salmon.

TLWS11-2

Now, when you consider the economic impact to our entire state of sending more and more of Idaho water downstream, and when you consider the recent federal studies that show drawdowns are not the silver bullet answer because almost all the Salmon smolt are making it through the Lower Granite reservoir to the dam, then it becomes obvious that we must do everything we can to shift our focus off of drawdowns and off of high water flows.

The National Marine Fisheries Recovery Team recognizes and acknowledges the need for a variety

TLWS11-1. The EIS consistently acknowledges that changes in river operations alone will not be sufficient to achieve recovery of the salmon stocks to the desired level, but that such changes are needed along with actions affecting other portions of the life cycle.

TLWS11-2. Thank you for your comment.

Letter TLWS11 Comments

of means to save the salmon. We cannot rely on drawdowns. And barging alone is not a complete answer.

TLWS11-3

We must consider a wider array of options that appear to be ignored here.

It's our opinion that the Columbia River Alliance proposed strategy called recover one comes closer to meeting the recovery teams plan than any of the seven options. I have enclosed that in exhibit one.

TLWS11-4

The one thing I'd like to add to that, though, is something that our Senator Dirk Kempthorne has been talking about is to continue to design and install fish friendly turbines in our dams.

So I urge you to improve the smolt transportation, immediately abandon drawdowns and high river flows as well as the dramatic spilling of water over the dams which incidentally hinders the transportation programs and increases the mortality caused by high gas levels.

River management agencies that were authorized by Congress must remain in charge of this great Columbia River System.

You have a great challenge before you,

Responses

TLWS11-3. Thank you for your comment. Please see Common Response No. 4 with respect to transportation.

TLWS11-4. See Common Response No. 11.

Letter TLWS12

Comments

TLWS12-1

One of the keys points is transportation of juvenile fish around the dams and reservoirs by barge and truck has shown to provide the greatest benefit for Salmon of all the actions we can take in the forseeable future.

He said during a briefing in his office he was told that transportation bolsters survival in all of the options where it can be used. Its use improves spring chinook survival by sixty-four percent in the base line option and is even more important to survival to fall chinook.

The transportation option must continue. It is in place and already beneficial for Salmon. We don't have to wait years for it to happen. Further it can be improved upon by various means and made even more effective.

Transportation is the single most effective short term option we have for aiding Salmon.

TLWS12-2

Flow augmentation beyond that included in the ninety-two ninety-three river operations makes no appreciable difference in survivability of salmon in river. Obviously some benefits accrue in low water years but at other times the difference are -- the differences are not discernible.

Once again the SOR tells us that setting

Responses

TLWS12-1. See Common Response No. 4.

TLWS12-2. See Common Response No. 12.

target full rates in the Columbia and Snake rivers so as to require a heavy volume of upstream water is not useful for salmon recovery.

Heavy flow augmentation poses a threat to irrigation water in southern Idaho and severe disruption of recreation and businesses centered on Dwarshak and other Idaho reservoirs. And, by the way, if you visited Dwarshak in the last month or so you will definitely know what he's talking about.

TLWS12-2

Though the SOR modeled several options by assuming a zero mortality rate from gas bubble disease for comparison purposes it is not so easy to wish away this problem in the real world. The science I have seen on this issue tells me that fish mortality will occur when gas super saturation exceeds a hundred ten percent.

TLWS12-3

The SOR options which reflect this real world data predict a negative effect on Salmon survival. I'll get through as quickly as I can. I have highlighted it.

The lower Snake River drawdown options presented in the SOR including the natural river alternative are problematic and costing somewhere from one point seven to four point nine billion dollars and in the real world of getting the

TLWS12-3. The Final EIS provides considerable information on gas supersaturation, including the sensitivity analysis referenced in the comment. The modeling also included runs where positive mortality rates from gas bubble disease were assumed.

Letter TLWS12 Comments

Responses

appropriations for such project we know we have to question whether that's viable.

Depending on the depth, drawdowns of the four lower Snake River reservoirs would require nine hundred thousand to one million three hundred thirteen thousand acre feet to refill. Two month drawdowns would actually disrupt river operations from three to five months depending on actual river flows at the time.

TLWS12-4 The SOR claims a great deal of uncertainty as to the possible effects of drawdowns on salmon recovery. At any rate the SOR options which permit transportation of the juvenile fish outperform the drawdown options.

He also said he would like to point out that the SOR does in his view did not incorporate the 1994 results from the pit tag studies and I know that was asked by an earlier questioner regarding those studies.

TLWS12-5 Survival through Lower Granite is apparently much higher than earlier thought and much higher than the SOR models assume. If the new data were to be used in models then the disparity in benefits between transportation alternatives and drawdowns would be even greater. Also this new information

TLWS12-4. Thank you for your comment. Please see Common Response No. 4 with respect to transportation.

TLWS12-5. The results of the 1994 Lower Granite survival studies are summarized in the Final EIS.

TLWS12-5

presents a strong argument against the need to conduct a drawdown test at Lower Granite reservoir.

I suggest the final EIS reflect this new data.

TLWS12-6

One last comment. Larry said he'd like to make his feelings known that the recreation impacts throughout the SOR are greatly understated. The recreating and fishing public have abandoned Dwarshak reservoir for instance for many reasons. They cannot depend on water levels. The experience is unsightly once drawdowns are begun as we all know, we have been up there. Businesses are going broke and are no longer there to serve the recreationists. It seems the recreation impact from the SOR were calculated somehow proportionate to the level of the drawdowns. I believe the effects are worse once drawdowns reach a certain point recreation drops dramatically.

I request that you re-examine these impacts. Thank you.

HUGH MOORE: The next commenter is Gerald Druffel and will followed by Joe Stegner.

TLWS12-6. See Response TBOI9–6.

Letter TLWS13 Comments

Responses

GERALD DRUFFEL: Yes. I thank you for the opportunity to voice my concerns of the systems operation review. I am Gerald Druffel, a retired farmer and port commissioner for the Port of Whitman County, Washington. I have lived in Whitman County which borders the lower Snake for other fifty miles all of my life and I was there before the Columbia Snake system was harnessed by the dams that now serve it.

These were the years of the great depression. We did not have electricity on the farm. River freight transportation was haphazard due to water depth. Irrigation was difficult and flood control was nonexistent. We did have Salmon.

In order to bring an economic recovery to the area congress authorized the Corps of Engineers to build a series of dams on this river system. They have brought an economy to our region that is the envy of the balance of nation.

TLWS13-1

To preserve this multi use river system and provide the Salmon enhancement, the Corps of Engineers, Bonneville Power and the Bureau of Reclamation must retain their management role as they were authorized to do by congress.

The poorly implemented water use of this past

TLWS13-1. Thank you for your comment.

Letter TLWS13 Comments

Responses

summer indicate a need for a more common sense approach to a balanced Salmon recovery program.

I do not wish for myself or my children or grandchildren a return to the Columbia Snake River system and the economy that was in existence before these dams were authorized by congress and built by the Corps of Engineers.

TLWS13-2

In conclusion I support recovery one by the CRA.

Thank you.

HUGH MOORE: We have five commenters remaining. Next is Mr. Stegner. Will be followed by Darrel Olson.

TLWS13-2. See Common Response No. 11.

Letter TLWS14 Comments

Responses

JOE STEGNER: I'm Joe Stegner. I'm with the Stegner Grain and Seed Company in Lewiston, Idaho, and our company is a barge shipper of grain down the Snake River to Portland, Oregon, and obviously I'm opposed to drawdowns. And so I would formally say I'm against any of the SOSes that include drawdowns as their chief item. I have just one brief comment.

TLWS14-1

Both of these documents, the summary and the little handout have a page in them called how the strategies would affect river uses and it's the full grid with all of the options.

On the very bottom portions of this, the very last item is changes to the total annual system costs. And that's asterisked with a -- does not include capital expenditures to modify existing dams.

TLWS14-2

I realize this is an operation document and not a capital expense document, but I think to leave out those dam modification costs trivializes that particular option.

Drawdowns are very very expensive and when people look at this information and they review this -- this grid sheet I think this is going to be the one item that most people rely on for quick information. And I would certainly encourage you to

TLWS14-1. Thank you for your comment.

TLWS14-2. The presentation of the economic impacts analysis results in the Final EIS has been revised, including a clearer treatment of the dam modification costs.

Letter TLWS15 Comments

Responses

TLWS15-1

TLWS15-2

analysis shows that the Snake River drawdown and lower Columbia drawdown configurations are low or negative biological benefit at very high economic cost. Flow augmentation benefits are very limited. They should be at moderate levels and they should be used to enhance the Snake River transportation system.

The project spills are offset by the impacts to the transportation system. There are some measures here that are listed that we have used to improve the transportation program that were significant in the arrival of other measures in small benefits.

I would also like you to acknowledge that when you look at these cost effectiveness rankings you can merge them both with implementation timing, near term versus long term and also with biological risks and you will find that the cost effectiveness measures are near term measures with low biological risks.

Thank you and we will send you the full report as part of the policy technical comments from the Columbia River Alliance.

Thank you.

HUGH MOORE: We have three commenters

TLWS15-1. This conclusion appears to be reasonably consistent with the results presented in the EIS.

TLWS15-2. Thank you for your comment.

Letter TLWS16 Comments

Responses

CRAIG TEISDALE: Good evening. My name is Craig Teisdale. I'm to local manager of the Idaho (inaudible) Fuel Office in Lewiston.

Earlier this evening a fellow (inaudible) made some excellent comments about the dilemma facing agencies when they have to resolve conflicts between competing standards. I'd like to offer a couple comments on water quality and air quality that might indicate a direction to help avoid some of the conflicts that can be seen down the road.

In the SOR EIS appendix M discussion of water quality the SOR water quality work was found a limited quantity fragmentary nature and quality of information can be a serious handicap in describing and prediction of water quality. The most critical deficiency is in the data that addresses interactions between water quality problems and river operations. Additionally complicating the study of the Columbia River Basin water quality is the large number of river systems involved. Each of these systems contains major reservoirs with unique characteristics.

TLWS16-1

The Idaho DEQ agrees emphatically with this SOR group finding with the amplification that a lack of water quality information is a critical

TLWS16-1. Your agreement on this point is noted.

deficiency that must be corrected in the ongoing SOR process.

Idaho urges the SOR leading agencies to develop and fund a comprehensive long term water quality monitoring program aimed at correcting the recognized SOR deficiencies and assuring compliance with state and federal and tribe water quality standards.

Furthermore this basin water quality monitoring plan must comprised of river systems specific sub plans developed in cooperation with the state tribal water quality agencies. Among the critical deficiencies that must be addressed in the water quality monitoring plan for the Clearwater and Snake River in Idaho are dissolved gas super saturation and attenuation in the Clearwater River caused by spill and power generation flows at Dwarshak Dam.

TLWS16-1

Initial monitoring by the Corps and by DEQ, operation of the Corps indicate the State of Idaho water quality standards were total dissolved gas of a hundred ten percent was consistently exceeded during the twenty-four thousand cubic feet per second spill at Dwarshak during July.

Item two dissolved gas super saturation

Letter TLWS16 Comments

attenuation and other projects affected by flow augmentation.

Item three, water quality impacts of surface water supply and public drinking water systems caused by fluctuation and water routes in Dwarshak Dam and there are several public water systems affected by that, Dwarshak state water system, Dwarshak dams water system, (inaudible) campground, the Dwarshak natural fish hatchery water system and the proposed City of Orofino water system.

TLWS16-1

The intake actually to the Dwarshak state park system was exposed during the latter part of the drawdown.

Item four. Resuspension of seven Dwarshak reservoir, the Clearwater River and the Snake River should also be addressed in the system water monitoring plan.

Item five water temperature fluctuation of the Clearwater River as the dam flows are rapidly altered. And there are some others and we will enter into the technical comments with our official response to the comments.

I would like to say a couple comments about air quality. Idaho DEQ believes that the underserved(?) limitation in the fugitive dust

TLWS16-2

Responses

TLWS16-2. The air quality analysis from the Draft EIS has been significantly revised for the Final EIS. Revisions include changes in methodology for addressing fugitive dust emissions, and inclusion of recent air quality monitoring data from stations at Lewiston and elsewhere near the SOR reservoirs.

TLWS16-2

analysis in the SOR EIS is understated. In particular we believe the assumed impact of only one point two miles from Lower Granite reservoir is likely too narrow to actively reflect the topographic and wind flow characteristics in the Lewiston Clarkston valley.

Idaho DEQ operates a permanent network of air particulate monitoring stations in Lewiston and Clarkston. Air quality has been continuously monitored since 1990. Public advisories are issued along with the air quality advisory commission in the valley. Our monitoring information is available to the SOR agencies and state and federal agencies and the public. We would encourage the consultants that prepared appendix B on air quality to review that information in their discussion on cummulative impacts. We will continue to operate these P.M. ten air particular monitoring stations and will provide any actual data to gage the actual affects of the various operating centers of Lower Granite Dam. Thank you.

HUGH MOORE: Next commenter is Dick Sherwin who will be followed by Ken Weis.

Letter TLWS17 Comments

Responses

TLWS17-1

BLM. It's the same old go-around. We can talk forever and ever and ever, but the final decision is going to be made by people that aren't sitting here today. You're only recommenders, it's not your fault. I'm just saying we never get to talk to the real culprit.

I have a little statement I want to read. It's quickly prepared and I apologize for that. I didn't know about this meeting until about fifteen minutes before we planned to leave home.

A multitude of federal agencies, environmental and special interest groups have used the anadromous fish as a club to beat up the working class of the northwest. They have been used as an excuse to shut down recreational land use and jobs. We are constantly asked to foot the bill to save these fish but we are not allowed to harvest the fruits of labors that we paid for.

TLWS17-2

If the environmental movement and the federal agencies want our help in preserving these fish, they are going to have to quit using them as a weapon against us. Everybody here likes the Salmon and would like to preserve them but we're getting real tired of getting beat over the head with them.

And I think that you're doing nobody a favor by

TLWS17-1. Thank you for your comment. The SOR agencies appreciate your frustration, and hope that the public can understand the practical limitations on access to the agency chiefs who are the ultimate decision makers.

TLWS17-2. Thank you for your comment.

Letter TLWS18 Comments

Responses

KEN WEIS: Thank you. Good evening. My name is Ken Weis. I'm a wheat grower from Asotin county, and transportation co-chair for the Washington Association of Wheat Growers.

The Snake and Columbia River system is an integral part grain movement from farm to consumer. Approximately sixty percent of Washington produced wheat moves by truck barge. On an average one hundred fourteen million bushels of wheat or sixty-two percent of Washington's total production is produced in a ten Washington county region, that ships via the Columbia and Snake River terminals. This week it moves at an average cost of forty cents per bushel or forty-five million dollars cost to pruducers.

Some counties such as Asotin, Columbia, Franklin, Garfield, and Whitman County move from from eighty to one hundred percent of their wheat this way. In instances rail is not an option due to the extensive rail abandonment in eastern Washington.

TLWS18-1

The SOR strategies appear inadequate to provide for benefit to Salmon and maintain the multi-use river system authorized by congress. The strategies cost millions of dollars yet provide

TLWS18-1. See Common Response No. 2.

TLWS18-1

questionable benefits to Salmon with severe consequences for resident fish and other wildlife in many instances.

TLWS18-2

The strategies also appear extremely dependent upon successful barge transportation of smolts. Barge transportation is clearly a vital element to Salmon survival as indicated in the SOR by the National Marine Fisheries service recovery team scientists. Priority should be given to the importance of smolt transportation.

TLWS18-3

In conjunction with improved transportation the design and installation of service collectors should be pursued.

TLWS18-4

Flow augmentation levels should be consistent with levels determined not to inflict damage on salmon.

TLWS18-5

Of the many salmon recovery strategies wheat producers are especially concerned with the high cost and benefits of drawdowns. Drawdowns of Snake River dams represent high cost with questionable potential, provide greater benefits to Salmon than with current operations. At the same time a four and a half month drawdown with navigation interrupted from mid February to March to October would directly impact wheat producers.

As much as seventy percent or more of

TLWS18-2. See Common Response No. 4.

TLWS18-3. See Common Response No. 5.

TLWS18-4. Thank you for your comment.

TLWS18-5. Thank you for your comment.

Washington wheat is moved to market by the river each year from March through October. The highways and rail systems are not physically adequate or have the capacity to handle this model shift.

The physical impacts and cost of river facilities are readily acknowledged yet the SOR concluded the true cost of the physical impact fail in comparison to the economic disruption caused by loss of trade. This is true.

It is impossible to tell buyers when they should buy your wheat. World grain buyers will simply go elsewhere as supply is disrupted and ships are either unable to load grain or even enter the lower Columbia channel due to low water levels.

TLWS18-5

These actions would obviously hurt grain producers and the ripple effect would soon occur from farm communities to the west coast.

Impacts of the drawdowns just on farmers alone is significant. The additional cost of moving wheat by alternative mode given the drawdown scenario is estimated at ten to fifteen cents per bushel on an average. This equates to an additional eleven to seventeen million dollars or about an average of thirty-six hundred or fifty-five hundred dollars per farmer. This is eleven to seventeen

TLWS18-5

million dollars totally drained from local economies.

In conclusion. Also many are jockeying for control of the river with the Corps of Engineers, Bonneville Power Administration, the Bureau of Reclamation must retain their management roles of the Columbia and Snake River system. Management choices will -- that will benefit not only Salmon but the public must be chosen.

In conclusion I would like to reiterate the importance of an improved transportation, new surface collectors, river flows in line with known benefit and move away from drastic drawdowns as an element of balanced Salmon recovery plan.

Thank you for your time.

HUGH MOORE: Mr. Weis was the last person to sign up for making a formal comment.

Is there anyone else in the audience who would like to make a formal comment at this time?

Then I'd like to thank you for coming to the meeting. We appreciate your comments on behalf of the interagency team. Thank you, and have a good evening.

HEARING CONCLUDED AT 10:11 P.M.

Letter TLWS19 Comments

Responses

you are under, I suspect the problems you are under, that's why you have so many problems trying to answer so many different questions. And I'm not sure you are ever going the answer that. There has been a lot of money spent in our area. First of all I didn't like that chunk of concrete rolling in. I was a fire warden in Holl's Camp when it was built on the North Fork, and so consequently they -- that camp was lowered and this summer one of fire control boats took out its lower prop on the pier of the little North Fork bridge. And there is a whole bunch of things that are going on that's not been recognized I think in the full analysis under the direction of the Endangered Species Act when there has been some questions here tonight and I just hope that your analysis because I think it's all headed for a big train wreck, but before we train wreck lets try to protect what we already have here and get it back into some kind of motion and that should be certainly a part of your social and economical analysis as you progress forward, because it doesn't make any sense whatsoever both economical, political or --

TLWS19-1 And I guess the thing that bothers me is when you see habitat with the wildlife and the fisheries

TLWS19-1. See Common Response Nos. 2 and 12.

Letter TLWS19 Comments Responses

TLWS19-1

being decimated when we're trying to bring back the fish that we don't know if we can even get it back out of the ocean if we get it to the ocean. We're sacrificing all these things in places like Dwarshak for no apparent reason in my opinion. I really think that really has to be part of this long term analysis when you get into it. And I hope you take that back to your bosses.

WITT ANDERSON: That's -- an excellent comment. I just would add once again my plug, our plug here for requesting you all to help us out in the analysis. Point out things we're missing, holes we have, inadequacies, what have you, or tell us it's good if that's the case. You all have to play a role in this as well as we do. That's the whole concept of going through NEPA and having informed decision making. Our job is to make sure our decision makers are informed. And that's where you have to help us out. I'm not asking you to go home and read that thing tonight but where you have particular interest and knowledge I think you can do that.

HUGH MOORE: Yes, sir.

MIKE GARRISON: My name is Mike Garrison are from Clarkston. I kind of got a question that kind

PUBLIC MEETING

SYSTEM OPERATION REVIEW

DRAFT ENVIRONMENTAL IMPACT STATEMENT

ORIGINAL

U.S. ARMY CORPS OF ENGINEERS

BONNEVILLE POWER ADMINISTRATION

BUREAU OF RECLAMATION

September 28, 1994
7:00 p.m.
Red Lion Motor Inn
2525 North 20th
Pasco, Washington

BRIDGES & ASSOCIATES
Freelance Court Reporters
P. O. Box 223
Pendleton, Oregon 97801
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Letter TPSC1

Comments

system operation review on the options presented as SOS 1 through 7 or the best combination of those options to bring about salmon recovery.

The film narrator pointed out all through the slide show that none of the seven options seem to really be the right thing.

TPSC1-1

We certainly agree. We are opposed to any option that does not stand the test of science to improve salmon survival, such as water spills, drawdowns, flow augmentation beyond threshold levels, and to top it off, all three of these options that I just described create social and economic disasters in the region.

There is no rational argument for those options. They are included in SOS options 3 through 7.

TPSC1-2

Option 2 is essentially current operations. Obviously, it's not acceptable.

TPSC1-3

Option 1 is not acceptable because it reverts to pre-listing conditions.

TPSC1-4

I don't know why we're still talking about studying drawdowns. We've listened for three years to testimony for drawdowns, with no basis. We have submitted comments for three years. There is no scientific study that supports drawdowns. Why isn't the

Responses

TPSC1-1. Thank you for your comment. The preferred SOS alternative identified in the Final EIS was not selected from among SOSs 3 through 7 presented in the Draft EIS.

TPSC1-2. Thank you for your comment.

TPSC1-3. Thank you for your comment.

TPSC1-4. The drawdown concept is still being considered because it continues to be identified as an alternative by many parties in various scoping processes, and because the region has yet to develop empirical data that specifically address the effectiveness of drawdown.

Letter TPSC1

Comments

TPSC1-4

drawdown issue put to bed? Why are we still talking about it?

There were three things that we can do in the river that will bring about salmon survival increases. That's the surface collector in the Lewiston area, juvenile transportation improvements, and Snake River flows up to about a million and a half acre-feet.

TPSC1-5

These opportunities exist right now. It's time for the region to get behind them and go ahead and do something. No SOR alternative includes these three actions, as their primary purpose.

Consequently, we need to modify the SOS 1 through 7. We support the try period that I mentioned above, or CRA's Recover 1.

A few other little comments. If the State of Idaho is so hung up on drawdowns as was discussed here a moment ago, why don't they drawdown Hells' Canyon or Brownlee, because I think that would do the region some real good. There is science in the region that will bring about salmon recovery; and addresses the things that are short at this time. That's the Bevan plan. The Bevan plan includes coordination of

Responses

TPSC1-5. See Common Response No. 11.

Letter TPSC2

Comments

federal judges, politician, river management agencies and state resource agencies with cameo appearances by the ever flamboyant environmental groups.

The directors and producers of this farce, the National Marine Fisheries Service, the Northwest Power Planning Council, have conspicuously ignored the real artists, namely, science and economics. These steady and solid performers over time have been the real contributors to the success of the prosperity of this region.

Why does it now make any sense to disregard the role of science and economics, when they have been so beneficial in the past, and so much is now at stake. Indeed, this distinguished recovery team, the Bevan team, of independent scientists appointed by NMFS to guide the recovery effort has had the misfortune of discovering truths that are not politically popular.

TPSC2-1

The single most important measure over which we can exercise any influence for salmon recovery is the smolt transportation system. The team has made several recommendations

Responses

TPSC2-1. The information and recommendations presented by the Bevan team have been reviewed and considered by the SOR work groups. The SOR agencies have documented our consideration of science and economics in the EIS.

Letter TPSC3

Comments

Responses

the Columbia River System Operating Review Draft EIS.

Before I discuss any of the options, I would like to comment on some of the figures concerning the irrigation study. When I saw in Table 4-3 that the net farm income for pumpers out of Ice Harbor pool was $453 per acre, I had to see where I was going wrong, because I have never been close to that figure before. In Appendix F, Table A-5, the SOR Crop Enterprise Analysis for Of wheat, I can see why my income is considerably lower. Some of the figures are so far off from reality that I have no idea who supplied the figures. I'll just highlight a few of the inaccurate figures.

TPSC3-1

For irrigation power, it was $10 an acre for growing wheat. Also I might add, for those other irrigators that are more acquainted with the power, it was $13.50 for growing potatoes. The depreciation on the irrigation equipment was 1.8 percent. Interest on the irrigation equipment was 3 percent. And land interest was 1.7.

Those are fairly low figures, I believe. I assume the figures were compiled perhaps from farmers on the power rate from the

TPSC3-1. See Response TBOI12–9.

Letter TPSC3

Comments

TPSC3-1

Columbia Basin Project, rather than farmers pumping out of the Ice Harbor pool.

In the Columbia Basin Project, water is usually delivered to the highest point on the farm, therefore, the power costs would be lower. Likewise, the cost of the equipment to deliver the water, that is, the water pumps, penstocks, booster pumps, etc., is not figured into the total costs.

TPSC3-2

I would urge that the figures be brought up to the real world figures of the specific projects. Each of the irrigators have figures for their inputs, and I am sure that the irrigators figures are more accurate than those that you used.

TPSC3-3

In each of the analysis on the options you state, there is no effect on irrigators except for Option 5 and 6. You do say that the wholesale power costs can rise from other options, except SOR 1, between 6 and 21 percent, which translates into a retail rate of 5 to 15 percent. Depending upon the specific lift and the crop grown, irrigators have a 50 to $130 per acre power cost.

So if each of those options would have

Responses

TPSC3-2. See Response TBOI12–9.

TPSC3-3. Please refer to the revised discussion of power rate impacts presented in the Final EIS.

TPSC3-3

a rise in power cost, that will have a significant negative effect on the irrigators.

TPSC3-4

From looking at the different options in the Draft EIS, I see little benefit in any of the options presented. Option 5 and 6 are very costly and actually would harm the ecosystem that is now established along the Columbia and Snake Rivers.

TPSC3-5

Options 3, 4 and 7 do harm to the ecosystem of the upper parts of the Columbia and Snake River system. Of course, it is sort of hard for me to understand what all those different options were. But it looks like that was the case on all of them for the large drawdowns in the storage projects.

TPSC3-6

I would suggest that the improvements be the barge transportation system, that is, more barges, better release points and better release system. Also, priority needs to be given to better design of surface collectors to help the transportation program.

Let's abandon the idea that we have to do flashy fills, super high flows and dramatic drawdowns. Also the Army Corps and the Bureau of Reclamation need to be in control of the operation of the river system.

TPSC3-4. The SOR agencies believe that the Final EIS accurately addresses the costs and ecological impacts of SOSs 5 and 6.

TPSC3-5. The above response also applies to the evaluation of SOSs 3, 4, and 7.

TPSC3-6. See Common Response No. 4.

Letter TPSC3

Comments

In conclusion, I suggest that some real world figures be used for the irrigation analysis in Appendix F.

TPSC3-7 And I support Recovery 1 as suggested by the users of the multi-use river system

MR. HUGH MOORE: We have 11 commenters remaining. Our next commenter is Bruce Lovely, and who will be followed by Darryll Olsen.

MR. BRUCE LOVELY: Thank you for the opportunity to comment. My name is Bruce Lively. I am of the Executive Director of the Columbia River Alliance.

I am glad that the three federal agencies that are so important to us sent out their best and brightest folks to come out and hear this. I think it's important for all of you folks to hear not necessarily as much from me but people that are here and depend upon the Columbia River system that have been here for, in some cases, you know, 20, 30, 40, 50 years, when we started to build up this system.

Our organization, the Columbia River Alliance, represents over 55 organizations. We represent over one million Northwest residents

Responses

TPSC3-7. See Common Response No. 11.

Letter TPSC4

Comments

that are dependent upon the Columbia and Snake River system.

You know, we have gone through the economic value of this system and really totaled it up to be about a 30 billion dollar annual resource to the Pacific Northwest.

And that's the reason why our economy, this community here, but beyond that, the whole Pacific Northwest, has been built around this river system, and it's in our interest to maintain this multi-use river system.

The other objective we have is to assist these threatened and endangered salmon stocks. We know that as river users we are going to be on the hook for salmon recovery, so we want to get the job done in the most efficient way possible.

TPSC4-1

We've looked at your options and frankly we conclude that none of the options, SOS 1 through 7, do meet the needs, our needs for a multi-use river system, but beyond that, the needs for the endangered salmon.

We look at the three options, the natural river option, but basically that does not aid Salmon, yet it does cost the Northwest

Responses

TPSC4-1. See Common Response No. 2.

estuary, because we know there is mortality that exists through Portland and through the lower Columbia.

But finally, though, it reduces the water that we're putting for salmon. This year alone we provided 11 million acre-feet of water out of the Columbia and Snake River system for salmon. We believe that water above five million acre-feet just doesn't provide any value to the fish.

Yet what it does, though, it strains communities like Orofino which saw their reservoir, Dworshak Reservoir, drawn down 110 feet, which eliminates their recreational opportunities. It also will put a strain, it hasn't though this year, will put a strain on irrigation users, also with resident fish, and it causes impacts to the hydroelectric system.

TPSC4-2

We believe our plan should be, the plan that the federal agencies move forward to because we believe it's a plan for both Northwest salmon and for Northwest residents. Thank you.

MR. HUGH MOORE: Our next commenter is Darryll Olsen, and he will be followed by I believe it's, is it Shannon

TPSC4-2. See Common Response No. 11.

Letter TPSC5

Comments

Page 4 of the handout that you have provides a graphic that serves as really the heart of illustrating the results of the cost effective analysis. As you can see here, this graph breaks up the measures into four quadrants.

As you move in the upper left-hand quadrant, you have measures that provide no biological benefit, or negative biological benefit, but incur relatively high costs.

As you move to the lower right land portion of this graph, you have measures that are showing positive biological benefits and reduced costs relative to the rest of the graph.

It's worth pointing out that in the analysis that we completed, we are looking at this analysis under low water conditions, and I would remind you that we are largely here today because of our concerns of low water conditions.

TPSC5-1

But what you will note is that the full or natural river drawdown would actually produce negative biological benefits relative to the existing smolt transportation program, but it would incur relatively substantial annual costs; annual cost of about 500 million dollars per year.

Responses

TPSC5-1. Please refer to Common Response No. 4, and the Final EIS discussions of the costs and fish survival estimates for SOS 5.

Letter TPSC5

Comments

Responses

TPSC5-2

We can turn instead to measures that would produce positive biological benefits, and as you can see here, we are looking at very conservative assumptions regarding transportation improvements, implementing a service collector at Lower Granite Dam, and we've also taken a very detailed look at flow, and what we have concluded is that we could provide roughly the same level of biological benefit that we are now if we could reduce the flow to about half of what we did during 1994 operations.

TPSC5-3

I'll conclude by acknowledging that we have also taken a look at implementation timing for these measures, and also the biological and economic risk in which you will see in the full report that will be provided to you as part of the Columbia River Alliance comments, is that those measures that are most cost effective are also near term measures and they are also measures that hold the lowest biological and economic risk.

Thank you.

MR. HUGH MOORE: We have nine commenters remaining. Our next commenter I believe is Shannon McDaniel. And you will be followed by

TPSC5-2. See Common Response Nos. 4, 5, and 12.

TPSC5-3. Thank you for your comment.

Letter TPSC6

Comments

Leon Mellenbacher.

MR. SHANNON McDANIEL: My name is Shannon McDaniel, and I am the secretary manager of the South Columbia Basin Irrigation District located here in Pasco, Washington. And I appreciate the opportunity to make a few comments tonight on the plan.

I read through the plan, or did the best that I could, and one of the things I would like to make a comment on first is that I realize that there was a plethora of knowledge gathered to make this plan, it is very hard to understand, very difficult to be able to ascertain the figures and facts in that plan, especially a lot of those numbers in Supplement F.

TPSC6-1

One of the things that I would like to note is that in the operations of Grand Coulee Dam, the actual reservoir elevation and the impacts on Banks Lake, and there are auxiliary impacts on the Columbia Basin Project are not identified in power, costs or power losses to the system. And also to the ability for the Columbia Basin Project to divert water in low flow years.

TPSC6-2

There is no magic in the plan that I find. Of the seven alternatives, none of them is

Responses

TPSC6-1. The transcript is unclear as to precisely what information is considered to be missing; the EIS does address the effect of the SOSs on the costs of pumping water to Banks Lake, although these costs are quite small.

TPSC6-2. The EIS analysis indicates that none of the SOSs would prevent or reduce the diversion of water for irrigation at Grand Coulee.

82

preferred. You commented on that. And the question I ask is why do you plan to fail by providing no preferred alternative, by randomly choosing the things that you think will work and not having presented that in a draft plan, seems a little futile to me.

TPSC6-3

Also I would like to comment on the presentation that was made, video presentation earlier in the program. A program that's filled with propaganda and subliminal messages about pollution, over-harvest, over-population, and I think that if you're willing to make those kind of statements, that you should be able to back them up in your report.

I would just like to reiterate the fact that I believe that it's a plan to fail.

Recently the Columbia Basin Project, the Bureau of Reclamation, working on the Columbia Basin Project expansion, shelved that project under the auspicious that there was a recovery plan out there and it had to be implemented and it had to be showing progress before that construction could continue on the Columbia Basin Project.

I feel that you have the same problem

TPSC6-3. See Common Response No. 1.

TPSC6-4

here. How are you going to implement a plan when you are not considering all the aspects of recovery of the salmon? There seems to be a plan to fail. It looks like the plan is just thrown out there and we're going to end up in court. Thank you.

MR. HUGH MOORE: Next commenter is Leon Mellenbacher, who will be followed by Tom McKay.

MR. SPEAKER: Thank you for this opportunity. My name is Leon Mellenbacher.

My wife and I, together with the mortgage company, own 1600 acres of farm four miles east of Burbank, Washington. 1400 acres of this irrigated land comes with water supplied with water from the Snake River. Our pump stations are a short way below the Ice Harbor Dam.

With reliable and consistent water supply, this farm generates income sufficient to support three working management families and five to 30 machine operators and laborers. And at the same time pay sales taxes, land taxes, school taxes, fire protection, highway taxes, State Industrial Insurance, Unemployment taxes, and

TPSC6-4. See Common Response Nos. 2 and 6; the SOR agencies only have jurisdiction over the hydro system, and not over the other aspects of salmon recovery.

Letter TPSC7

Comments

To be most effective, in this we should use the best scientific data, procedures, economies, and implementations.

TPSC7-1

After comparing the salmon Systems Operating Strategies options and the Recovery 1 option, I strongly support the Recovery 1 approach. This directs, A., that the federal hydroelectric power system operators and the NMFS, should place top priority on improving and enlarging the smolt transportation barge system, by adding more barges and releasing the fish closer to the estuary.

B. Smolt surface collectors should be designed and installed at Lower Granite Dam to work with the barging system.

C. High-level flows from the Snake and Columbia River system should be immediately eliminated.

D. Reservoir drawdown and high-level flow measures should be stopped. Further work for federal resources allocated to drawdown review should be immediately stopped.

E. No more drastic spills. The basic features of the 1989 long-term spill agreement should be kept in-place. Additional

Responses

TPSC7-1. See Common Response No. 11.

Letter TPSC8

Comments

TPSC8-1

The seven strategies outlined in the draft SOR statement are inadequate to provide for salmon enhancement and the needs of a multi-use river system. The strategies that include drawdowns, spills and high flows from storage reservoirs have high biological risks to salmon and enormous costs to the region.

Individuals advocating strategies are content to roll the dice. Even if the risks are high and the results may be devastating. They would then blame others and advocate other measures. The Northwest salmon and the region would continue in a downward spiral.

TPSC8-2

I would join others in supporting the alternative plan proposed by Columbia River Alliance called Recover 1. Some of the main parts of the plan would be first to make immediate improvements to the transportation and the release of juvenile salmon. These improvements may include increased equipment, changes to the existing equipment, and changes in smolt releasing practices. Which should improve the collection facilities on federal dams in connection with the juvenile salmon transportation program. Drawdowns will increase salmon mortality

Responses

TPSC8-1. See Common Response No. 2.

TPSC8-2. See Common Response No. 11.

Letter TPSC8

Comments

and decrease the likelihood of a successful recovery.

TPSC8-3

Opposition to this risky measure must be part of the recovery plan. Spills and high-level flow augmentation reduce the effectiveness of the juvenile salmon transportation program, while increasing the mortality caused by high dissolved gas levels. Additional spills such as the one that occurred in 1994 should be avoided. The management of the river system by the Army Corps of Engineers, Bonneville Power Administration and the Bureau of Reclamation, must be based on the best science and technology available.

Political gamesmanship must be eliminated.

Henry Johnson quoted secretary Babbitt word perfect, so I won't repeat that again, but let me just say that his comments are totally inappropriate for one of our governmental leaders.

The Northwest populous looks to you to ensure that the Columbia and Snake River systems are managed according to science and not political rhetoric.

Responses

TPSC8-3. The salmon recovery plan is the jurisdiction of the NMFS, not the SOR agencies. The Final EIS discusses the elements of and rationale for the preferred SOS alternative, and is based on the best scientific information available.

TPSC8-4

Mr. Van Walkley mentioned some power costs associated with irrigation. If those costs are the ones stated in the document, I might say from our standpoint, those costs, they have a decimal problem, they are that far off.

Thank you.

MR. HUGH MOORE: The next commenter is Jim Sanders, and will be followed by Bob Chamberlain.

MR. JIM SANDERS: I, too, thank you for the opportunity to comment. My name is Jim Sanders. I'm the assistant manager and chief engineer of the Benton County PUD, located just across the river. I'm here on behalf of our three elected officials at Benton PUD, and at their request.

Benton PUD represents some 33,000 customers. We essentially have two economies, or two drivers in our economy. One is the Hanford Area, and the second that we think we are in for the long haul and hopefully will be a very strong driver, is the ag economy.

And as such, the changes that are forthcoming in the System Operation Strategy are very important for us for several reasons.

TPSC8-4. The power and irrigation analyses from the Draft EIS have been significantly revised for the Final EIS.

Letter TPSC9

Comments

First, is the cost and availability of power that we'll get out of the federal system.

Secondly is the availability of water for our irrigators.

And last and probably most important, but seems to be forgotten, by a lot of our detractors, is that we are interested in recovery of the anadromous fish, and many of the actions that have been taken to date, while they cost a lot of money, don't seem to benefit the fish.

I'm happy to say I'm not a fish expert. I am an expert in operating a utility, and I don't want to become a fish expert. I'm not here to suggest a preferred alternative, but perhaps some guidelines that could be used as a System Operations Strategy is developed.

TPSC9-1

The SOR EIS should not be the only document that's used as the measures for the SOS are developed. I was pleased to hear that the systems configuration was also going to be used.

Perhaps the biological test drawdown EIS and there are probably other documents out there that I am not aware of that could be incorporated into the SOR EIS and adopted by

Responses

TPSC9-1. The SOR agencies have an obligation to provide full documentation of the analysis of all SOSs in the SOR EIS.

Letter TPSC9

Comments

reference.

As Darryll Olsen mentioned, the SOS measures must be subjected to not only cost effectiveness analysis but also life cycle analysis. Perhaps the Bevan plan reviewed in light of some of the more recent research done by the University of Washington and Darryll would be a good place to start as an SOS is developed.

TPSC9-2 It seems clear to me that drawdowns at both the Snake and John Day pools are non-starters.

TPSC9-3 And it seems pretty evident that transportation of the smolt needs to be increased.

TPSC9-4 I would also suggest that for the forum, that the three agencies need to maintain control of the SOS decision-making process and not pass that off to somebody else.

TPSC9-5 I would suggest that consultation with the Power Council would probably be appropriate also.

In closing, I think that the document that's been prepared by the three agencies does a good job of marking out the book ends for doing just about whatever you damn well please with the river, as far as coverage within the Environmental

Responses

TPSC9-2. Thank you for your comment.

TPSC9-3. See Common Response No. 4.

TPSC9-4. Thank you for your comment.

TPSC9-5. The SOR agencies have been consulting with the NPPC throughout the SOR process.

Letter TPSC10

Comments

farmers who have spoke, our irrigators who have spoken this evening. And we serve approximately 80 percent of the electrical needs in Franklin County, many of which are irrigators who pump directly from the Snake River, the Columbia pool, and from deep wells.

TPSC10-1

We are probably leaning most favorably towards the alliance background Recover 1. We do have some talking to do before we're finalizing on that, but we're very, very close.

TPSC10-2

One of the things I would like to say is that we feel that the management agencies, such as the Bureau of Reclamation, Bonneville Power, and the Corps of Engineers, must be maintained and supported in the management of the river.

It's been alluded to that we have some wild cannons firing some crazy shots, and we don't want our management diluted. I suppose the old adage, we would rather deal with the devil we know than the devil we don't know.

Thank you.

MR. HUGH MOORE: Our next commenter is Ruth Asercion, and she will be followed by Suzanne Sullivan.

Responses

TPSC10-1. See Common Response No. 11.

TPSC10-2. Thank you for your comment.

Letter TPSC11

Comments

MS. RUTH ASERCION: My name is Ruth Asercion, I represent the Benton Rural Electric Association Board of Trustees.

The Benton REA operates electrical facilities in Benton and Yakima Counties. Our system borders the Columbia and Yakima Rivers. It is extremely important that the System Operating Strategies when adopted do the job.

The Benton REA has prepared written comments signed by all nine board of trustees. Please accept this letter of those written comments. The letter supports the CRA's Recovery 1 plan and we believe it is a better way of operation. TPSC11-1

MR. HUGH MOORE: I would also like to take this opportunity, that other previous commenters have had prepared statements. It would be very much appreciated and very helpful if you could leave us a copy, at least one copy of your statement.

Our next commenter is Suzanne Sullivan, and she will be followed by Richard, I'm not sure if it is Baytall, Beightol.

MS. SUZANNE SULLIVAN: Good evening. I appreciate your patience and your

Responses

TPSC11-1. See Common Response No. 11.

Letter TPSC12 Comments

consensus or your technical information, your science, but you need to take the information of the people who walk the road, who live in the area, who farm the ground, who pay the bills, we do need to have a correct impact and here, you hear what we have to say, because we are here and I appreciate your interest you have in that.

TPSC12-1

I do feel also as I stated before in the thing, that we are looking at the issue of the salmon getting down the river, what about the salmon getting back. We are looking at half the picture. It's like as though when you make a recipe and you cook something, you have a pie without flour, you don't have regular pie. And if you make cake or have things without sugar, you don't have a good recipe.

You need to look at the full cycle, the full impact of what it takes to make the salmon positive. I am for the salmon. I like salmon and I want the fish and the wildlife to occur, but I also don't want my life and the life of others to disappear.

MR. HUGH MOORE: Our next commenter is Richard Beightol, and he will be followed by Fred Ziari.

Responses

TPSC12-1. The SOR has considered operational effects on both juvenile and adult salmon. Structural measures that would benefit adult salmon are being considered through other processes.

Letter TPSC13 Comments

Responses

MR. RICHARD BEIGHTOL: Thank you. My name is Richard Beightol. I appreciate the opportunity to come here tonight and comment.

I'm vice-president or production for Mercer Ranches, Incorporated. And I'm also here tonight representing the Columbia Snake River Irrigators Association.

The time has come to end the status quo. The time has come for the Tribes, state fisheries management agencies, the Northwest Power Planning Council, and regional and state governments to do what is right for the fish and our multi-purpose river system.

TPSC13-1

The National Marine Fisheries Service recovery team has identified improved smolt transportation systems as the most effective way of moving smolt through our river system. It is time to put drawdowns and unrealistic flow proposals behind us once and for all.

TPSC13-2

SOS Options 1 through 7 fall short of what I believe are the most effective strategies to enhance salmon recovery.

TPSC13-3

The accepted operation strategy should include the following measures:

1. Primary focus to move smolt

TPSC13-1. See Common Response No. 4.

TPSC13-2. See Common Response No. 2.

TPSC13-3. See Common Response No. 11.

downstream should be on transportation systems. Smolt transportation systems should be expanded, more barges should be added to the transport fleet, and improved barging concepts should be evaluated and implemented.

2. The design and construction of a surface collector -- surface smolt collector at Lower Granite Dam should begin immediately.

TPSC13-3

The Army Corps of Engineers have demonstrated the leadership and dedication required to operate our river system according to the laws of this country. I support their efforts in the past and in the future.

I support the Columbia River Alliance Recovery 1 Option and encourage serious consideration and implementation of the Recovery 1 components.

In closing, I would like to make a brief comment on the Youngman from Evergreen Community College student that commented earlier, and I think he made an excellent point, that we were giving up generating capability, and had some suggestions for new generation. And I appreciate that.

I guess what I would like to add to

Letter TPSC14 Comments

some observation that I have looked at the index, and the word watershed came up only once in the whole SOR.

TPSC14-1

I think when the decisionmakers are looking at the whole document that is in front of you, it would be a mistake not to mention improvement in the watershed as one of the measures that will improve the salmon recovery in fairly short period of time.

It has shown that we do have capability to have involvement of the local citizen, can get involved in a manageable size of watershed and help in the recovery of salmon.

I strongly urge that since we all live in a different watershed, the citizens can make a difference by getting involved.

TPSC14-2

The drawdown options, in any of the SOR, have not proven to be biologically sound, and we do not support that.

I have some specific comment and we will provide some more detailed information at a later time.

TPSC14-3

The SOR documents assume that the farmers will pay for the total cost of all the modification that happens as a result of any of the

Responses

TPSC14-1. See Common Response No. 6.

TPSC14-2. Thank you for your comment.

TPSC14-3. The EIS identifies the expected cost of modifications needed to continue irrigation in the affected areas, but does not specifically identify or assume who would bear the costs of these modifications.

Letter TPSC14 Comments

Responses

SOR options. This point is not clear in the body of the document, and we would like to have you in the final document make that point clear, that that is the assumption.

TPSC14-3

There are some discrepancies at the cost of the impact to the irrigation that we will give, provide more detailed information at a later time.

The SOR evaluated the impact based on total cost of acreage and total cost of modifications. This is not a true and correct assumption, since the cost to modify the pumps and energy cost increases have no direct relationship to the size of the farms. And a small farm has almost the same impact as a very, very large farm.

TPSC14-4

As we have looked at the impact range from 46 to $1,600 per acre, where the cost of the land may be a thousand to $1,500 per acre, this needs to be emphasized.

The energy cost increases also is not a direct relation to the size of the farm. The increases in the energy increases due to SOR 5, 6 and 7 ranges from one and a half percent to 50 percent. That needs to be emphasized in the body

TPSC14-5

TPSC14-4. See Response TBOI12–9.

TPSC14-5. See Response TPSC8–4.

Letter TPSC14 Comments

Responses

of the report.

TPSC14-6

Also, since the payments are born by the farmer in the SOR document, the hundred year analysis of the impact with the eight and a quarter percent interest is not a realistic assumption and needs to be considered.

I thank you very much.

MR. HUGH MOORE: Is there anyone else who would like to give a formal comment? Yes, sir.

MR. KELLY HARDING: My name is Kelly Harding. I work for Tidewater Terminal Company as a tankerman in Pasco, Washington. Tidewater uses the Columbia and Snake River system to transport millions of tons of grain, petroleum and other commodities to certain export and domestic trade. Additionally, our company supplies, operates three tank farms on the system for storage and distribution of liquid products; motor fuels, heating oils, aviation fuel and fertilizers.

The importance of a healthy river system free from any disruption in normal traffic patterns is vital to those shippers dependent on the reliable transportation link to carry their

TPSC14-6. See Response TBOI12–9. The interest rate and analysis term used in the Draft EIS were based on Federal guidelines for national economic development analyses, and were not intended to reflect the financial situation that might be encountered by an individual farmer.

products and commodities to market. Thousands of jobs are created by this important and strategic arterial.

Accordingly, I appreciate the opportunity to comment on the System Operation Review. However, your strategies in the draft remain inadequate for salmon enhancement and the needs for a multi-use system.

TPSC15-1

I and many others support the Columbia River Alliance proposal called Recovery 1. I won't go into that because I have already gone into the basis of that recovery plan beforehand.

The plan's consistent river operations would help maintain the river system in the Columbia -- maintain the irrigation system in the Columbia River Basin and would not shut down the river to navigation, and would increase recreation use of the reservoirs.

Thank you.

MR. HUGH MOORE: Is there anyone else who would like to comment?

Then on behalf of the inter-agency team, I would like to thank all of you for coming to the meeting tonight, sharing with us your

TPSC15-1. See Common Response No. 11.

BEFORE THE
BONNEVILLE POWER ADMINISTRATION
U. S. ARMY CORPS OF ENGINEERS
BUREAU OF RECLAMATION
PORTLAND, OREGON

PUBLIC MEETING

On The

COLUMBIA RIVER SYSTEM OPERATION REVIEW

(SOR DRAFT EIS)

Morrison Room,
Portland Conference Center,
Portland, Oregon.

Monday, October 3, 1994.

Pursuant to Notice, the above-entitled matter came on for Hearing at 1:00 o'clock p.m.,

BEFORE:

A PANEL CONSISTING OF:

JAMES FODREA, Bureau of Reclamation - Opening;
HUGH MOORE - Facilitator;
PHIL THOR, Bonneville Power Administration - Member;
WITT ANDERSON, U. S. Army Corps of Engineers - Member;
JOHN DOOLEY, Bureau of Reclamation - Member.

I N D E X

Letter TPOR1

Comments

deals with humanity versus the environment is the exploding world population. Certainly, that has the greatest impact on what's happening here in the Northwest with the huge immigration problem from the Third World and the resultant immigration problem we have up here in the Northwest. A lot of people are fleeing places like Southern California, including myself, and moving to the Northwest.

I came here in 1986 seeking a better quality of life, and looking for a relatively unspoiled, smaller urban environment which I thought I found in Portland.

I hate to see what's happened in Southern California and other environmentally exploited areas, and I hate to see that happen here in Oregon as well. But I also think that the local economies and personal property rights of residents in this area have to be considered on at least an equal footing with wildlife considerations. Any kind of "fish first" policy which takes solely into account the needs of migrating salmon and ignores the needs of the residents in the area and private property owners and such, I think is an extremist point of view that hopefully will be tempered, and an ultimate compromise reached by your organizations.

TPOR1-1

I think compromise probably is the bottom line here. As someone said, I think the best situation is going to be a little pain for everybody, and I hope that that ultimately is the procedure that's followed -- not a lot of pain for a few

Responses

TPOR1-1. Thank you for your comment.

Letter TPOR2

Comments

the current velocity flows in the system; we'll be able to feed and monitor and protect the fish from any mortality that occurs down through the system now.

TPOR2-1

Your biggest mortality is the mortality from the turbines. We'll go through the locks with our system. Predetation is a large problem. We'll be able to eliminate that because they'll be protected in nylon nets going down through the system. Currently, there's not adequate food for the smolts going down through the system. We'll be feeding them. Also, you cannot monitor for health in your current system, and we'll monitor the fish health down through the system.

If there's any kind of disease that they attract, we'll be able to medicate the fish, once the virus is identified, and we'll also be able to monitor the fish before release so they'll be the healthiest fish going out into the ocean to where, if they have an impact from another El Nino current, they'll have a larger time period to readjust to a food chain.

I have that to offer -- take under consideration. This would eliminate unnecessary drawdowns throughout the system.

MR. MOORE: Thank you. Our next commenter is Nancy Tester, and she will be followed by Jeannie, and I'm not sure of the last name. Dodson-Edgars, okay.

Responses

TPOR2-1. See Common Response Nos. 4 and 6.

Letter TPOR3

Comments

authorized by Congress. This means that everyone who depends on the system cannot plan their activities with any degree of certainty.

All interests are being affected. Even fish are impacted by knee-jerk reactions made without consideration of the system impacts, and the effects of future operations for fish. A storage reservoir, once drained, must operate at minimum outflow for, in some cases, years to refill. This simple concept appears to not be understood by many of those that advocate bold actions in an attempt to save the salmon. All interests need the operating agencies to re-establish operational strategies that will return to the system a degree of certainty.

In these comments, we focused on the proposed activities that will improve the operational decision-making process. Our goal is to return some of the certainty that is so important to ongoing decisions that our companies must make. If the system cannot be operated in a way which we can reasonably plan our operations, we will be forced to secure other alternatives and move operations elsewhere.

TPOR3-1

In particular, on the forum and the decision-making processes -- the SOR recognized the need to improve on the operational decision-making process through the development of a forum. The idea behind the forum is that the current process is not transparent and includes little opportunity for

Responses

TPOR3-1. Thank you for your comment.

Letter TPOR3

Comments

Responses

public involvement.

TPOR3-2

In our review of the seven forum alternatives, we believe that there are only two viable options. These are the first and second options that follow the current decision-making process with the operating agencies continuing to make operational plans and decisions. Alternative 2 is probably most realistic because the Council will continue to develop a fish and wildlife program that the operating agencies will need to take into account in their decision-making.

The idea of formalization of decision-making is critical to providing operational predictability and some degree of certainty for all river users. However, the responsibility for current operational decisions has been clearly assigned through the authorizing legislation for each project. We do not believe that it is possible to secure fundamental changes in operational responsibility without legislation that modifies not only the operating agency but also the authorized project purposes. It will not be possible to make fundamental changes in the legislative project purpose without changing the entities that are responsible for paying for the operations.

The operating agencies must continue to accept the responsibility for making difficult operational decisions. This was Congress' intention in the legislation that authorized each project, and cannot be changed without new

TPOR3-2. Thank you for your comment.

Letter TPOR3

Comments

legislation and bloody political battles.

You have alluded briefly to legislative changes without specifying what that would entail, and how those mechanisms would be implemented. I think that's a serious deficiency in the document.

TPOR3-3

The decision problems described in SOR are a classic application for multi-attribute decision analysis methods. These methodologies have been well developed to address complex societal decisions involving a variety of value structures, utility functions and risk preferences. Multi-attribute decision analysis does not require the quantification of all attributes in dollars, and thereby avoids the perception that some attributes such as the last fish or the chance of an invasion of an Indian burial ground must be measured in dollars.

The most important attributes to the hydro system are defined in the SOR. In many cases, the measurement of how various alternatives perform on each attribute have also been developed and is presented. This is a good start towards a formalized decision-making process, but will have to be taken further to implement a structured decision analysis approach.

DSI recommend that the operating agencies develop a formal decision analysis framework and adopt it in the final SOR EIS.

Finally, there must be accountability for any

Responses

TPOR3-3. The SOR agencies believe that the decision process described in the EIS Summary and Chapter 8 of the Main Report is appropriate and sufficient for the key issues under consideration.

Letter TPOR3 Comments

Responses

operational decision-making framework to be valid. For too long, many of the decisions that shape the hydro system environment have not been traceable to the person or persons responsible. Either good or bad outcomes need accountability for there to be progress toward the actions that are successful and away from those actions that are not working or have unforeseen negative impacts.

In terms of preferred alternatives, we've reviewed the seven alternatives that are presented in the SOR. While these do represent a comprehensive list of the alternatives that are commonly discussed for alternative system operations, the only alternative that can be implemented in a timely fashion is in the SOS-2 family of alternatives. The CRA Recover 1, improvements to SOS-2 should should be adopted. Other alternatives of SOSs would either require too much time for engineering, or their implementation would be without information that could reasonably predict the impact, either positive or negative.

TPOR3-4

In the face of endangered species, we sincerely hope that the humans responsible for system operations will not take precipitous, panicked actions. Measures with low biological risk and high economic and biological effectiveness must be selected for implementation.

Also, the SOS-2 family measures appears to come closest to the recovery team's recommendations, and we

TPOR3-4. The SOS preferred alternative identified in the Final EIS can be implemented in a timely manner. See Common Response No. 11 with respect to the Recover 1 alternative.

Letter TPOR3 Comments Responses

TPOR3-4

recognize that they were delivered too late to be incorporated into the SOR. But --- (interrupted)

MR. MOORE: Time is up.

MS. TESTER: Do I have a --- (interrupted)

MR. MOORE: You can go ahead and finish. Go ahead.

MS. TESTER: Thank you. As an independent scientific panel, the recovery team's recommendations represents the best the Region has to offer from the independent scientific fisheries community for the listed salmon.

While recovering the enhancement of salmon may go beyond operating agencies' existing authorities, we believe you should place due weight on their recommendations in this process.

Current research results on the biological effects of drawdown appear negative and biologically risky. We do not advocate continuing to dilute our human resources by pursuing this course of action. Problem-solving requires focused objective efforts, not political agenda shopping.

Thank you for the opportunity to express our views, and we'll provide more comprehensive detailed comments by your November 7th deadline.

MR. MOORE: Thank you. We have 12 commenters remaining. The next one is Jeannie Dodson-Edgars, and will be followed by Glenn Vanselow.

STATEMENT BY MS. JEANNIE DODSON-EDGARS

Letter TPOR4 Comments

Responses

today to solve a problem that you think is today, is because you're only solving the problem on what you know today.

TPOR4-1

Be constantly adaptable, look at Recover 1, consider the Columbia River Alliance's proposal, and consider our comments as a practical approach. We don't have the engineering and the technical expertise that you have. We rely that on you, and we vest that power in you to make public policy decisions in a reality environment, instead of a reality vacuum. Thank you.

MR. MOORE: Okay. Our next commenter is Glenn Vanselow and will be followed by Bruce Lovelin. And so as to be less disruptive, hopefully when your time runs up, I'll just hold this to the microphone and you'll hear the alarm clock go off.

COMMENTS BY MR. GLENN VANSELOW

MR. VANSELOW: Thank you for the opportunity to appear today. My name is Glenn Vanselow and I'm with the Pacific Northwest Waterways Association. We represent about 140 organizations up and down the Columbia-Snake River system, on the Oregon Coast and up in Puget Sound, involved with economic activity throughout the Region, including port authorities, the tug and barge operators and major shippers on the river system, as well as others.

My intention was to comment on both the system operation strategy options and the section on navigation; and

TPOR4-1. See Common Response No. 11.

Letter TPOR5

Comments

I think I covered my navigation comments with my question earlier, so I'll focus only on the system operation alternatives for now.

TPOR5-1 First, I think it's fair to say that we will not be going back. The pre-ESA operation does not appear to be a viable alternative, and we believe it should be discarded.

TPOR5-2 Second, science continues to move away from drawdowns. Not only are recent studies adding to earlier ones showing that they are not helpful to salmon, they are likely to increase their mortality; and we believe that all drawdown alternatives should be discarded as well.

That leaves a range of implementable and cost-effective options around which an operating strategy and a recovery plan can be developed. One, improve the transportation system, add more barges, improve and diversify the discharge of smolts in the Lower Columbia and in the estuary, and experiment with new types of equipment, including net pens.

TPOR5-3 Second, improve the collection and bypass facilities at the dams, including development of the surface collector; and third, use flow augmentation at reasonable levels of five to eight million acre-feet, as proposed in the NMFS recovery team's recommendation and the Strategies for Salmon prepared by the Northwest Power Planning Council.

These are essentially the Recover 1 alternatives or

Responses

TPOR5-1. See Response O42–1.

TPOR5-2. See Response O42–2.

TPOR5-3. See Common Response No. 11.

Letter TPOR5

Comments

Responses

TPOR5-3

the Recover 1 option as proposed by the Columbia River Alliance. It's an aggressive plan, but it does provide a significant amount, in fact, the greatest amount of biological benefit for the fish at a significantly lower cost than the other options.

These elements, of course, have to be combined with other recovery actions outside the purview of the SOR, including harvest management, improvement of hatchery practices to support the listed species, and improvement of habitat in the spawning areas and in the ocean. We believe the appropriate elements are included in the NMFS Recovery Team's recommendation.

TPOR5-4

A significant shortcoming of the SOR process -- and I might add, none of the discussion of the shortcomings about the process is meant to reflect on any of the individuals in the room. We appreciate the hard work that everybody's doing at all of the agencies to get this work done. But a shortcoming of the process is that it, like just about every process that we've had since the beginning of the Salmon Summit, has focused on only one element. That's mainstem survival. This continued regional focus on only one element that covers a small portion of the life cycle of the salmon, distorts the public's view of the necessary recovery measures, and could lead to the wrong conclusions.

So, in the completion of the SOR EIS, I would hope

TPOR5-4. See Common Response No. 6.

Letter TPOR6

Comments

TPOR5-4

that there is a section that discusses the SOR actions in the context of a broader set of recovery actions. Thank you.

MR. MOORE: We have ten commenters remaining. The next commenter is Bruce Lovelin, and will be followed by Karl, I believe it's Karlgaard.

COMMENTS BY MR. BRUCE LOVELIN

MR. LOVELIN: My name is Bruce Lovelin; I'm the Executive Director of the CRA. Maybe I can talk really loud so I can bring down two panels, to get people moving out of here pretty quickly.

(Laughter)

MR. LOVELIN: I want to thank you folks for the opportunity to comment here today. The Columbia River Alliance represents a broad group of interests throughout the Pacific Northwest, representing the utility industry, forest products, agriculture, navigation, labor and community groups. The Columbia-Snake River system is the backbone of our economy, representing about $30 billion in annual economic value to the Pacific Northwest. We feel that that should be maintained.

We appreciate the commitment by the three Federal agencies here, Bonneville Power, the Bureau and the Corps. We do, though, have some concerns that that commitment isn't shown with the other Federal agencies, the Fish & Wildlife Service and the National Marine Fisheries Service, because I

TPOR6-1

Responses

TPOR6-1. It is not unusual for cooperating agencies, as the NMFS and USFWS are for the SOR, to remain in the background in public involvement efforts. However, their lack of participation at the meetings has not prevented the cooperating agencies from being aware of the issues and the public concerns. Please note that NMFS held its own series of public meetings in the region during May and June, 1995 to gain public input on the draft recovery plan.

Letter TPOR6 Comments

Responses

TPOR6-1

think you folks are gaining from what the public has been telling you in these last six, seven meetings, and we would hope that the other Federal agencies could have been here, too.

The SOR is our process. I mean, it's a process that looks at all uses of the Columbia River system and tries to create a balance. It's important, frankly, to us, that it maintains its economic health of the river system.

I read a quote today in The Oregonian describing this meeting, which it said that -- kind of describing the SOR -- the options -- and that was, the less people are willing to pay, the worse things get for fish. It's kind of Phil Thor's spread-the-pain kind of notion that we all have to spread some pain, and Phil, you're not the architect of that phrase. I certainly heard it from Governor Roberts and others.

But we don't think that that has to be that type of a situation, where we do develop a win-lose situation, moving water from other historical uses of the river system towards fish. But actually, in our view of the SOR, it's a lose-lose situation. Your strategies -- your SOS Nos. 3 through 7 are lose-lose. They actually do not help the fish. But the one thing they do is they harm the economy.

TPOR6-2

What we have done is, we have developed another approach, and I -- you know, I don't want to suggest to you that the CRA is now proposing another salmon plan. Not that

TPOR6-2. See Common Resonse Nos. 2 and 11.

Letter TPOR6 Comments Responses

TPOR6-2

at all. We're plagerizing from what the scientists have been telling us and telling you folks -- some of these folks that are your scientists. And we've developed a plan which we call "Recover 1" which has three elements to it, one of which -- it installs a surface collector at Lower Granite Dam because again, we believe, based on what the scientists have been telling us, that barging fish is helpful to fish; it's helpful to the juvenile salmon. It does improve survival.

The second component is releasing salmon farther downstream closer to the estuary, instead of releasing them right below Bonneville Dam.

And the third element is to -- let's maximize the amount of water we're using for fish. This year alone we provided about 11 million acre-feet for salmon -- about 60 percent of the U.S. Federal storage. We're recommending that about five million acre-feet is provided for salmon. Anything over and above that provides us no value, but it costs the Region a lot of money and it costs the ratepayers a lot of money.

We believe that the Recover 1 plan is an aggressive approach. It's not a status quo plan. It's basically a $200 million in capital program which we're putting our money where our mouth is, because this is the Northwest revenue or resources that we're putting forward, and we want to do the best thing we can for salmon to get the job done, so that we

Letter TPOR6

Comments

can do it in the most cost-effective way, and as soon as a way possible.

We also believe that the plan is really in excess of total ten-year costs -- about a one billion dollar plan. Now, this is combining beyond the elements I talked about, or some of the efforts which the Corps, the Bureau and Bonneville are working forward in a system configuration study.

TPOR6-3

Finally, we would recommend that the Corps and the Bureau and the Bonneville Power Administration maintain their management control of the Columbia-Snake River system. Thank you.

MR. MOORE: Our next commenter is Karl O. Karlgaard, and I hope I'm reading that correctly, and will be followed by Dave Clinton.

COMMENTS BY MR. KARL KARLGAARD

MR. KARLGAARD: Thank you. My name is Karl Karlgaard; I work for the Pacific Northwest Generating Cooperative here in Portland. Our Cooperative represents about 28 rural electric cooperatives that are scattered all through the Northwest Region. One of their main similarities is that they all purchase their supply of wholesale electricity from the Federal system through the Bonneville Power Administration.

In addition to relying on electricity from these Federal dams, many of our Cooperative members also rely on the

Responses

TPOR6-3. Thank you for your comment.

Letter TPOR7

Comments

rivers for transportation of their ag products for irrigation, for a lot of other factors.

PNGC's fundamental position is that we support a balanced, scientifically sound, cost-effective and comprehensive effort to support the declining salmon runs. We believe that there are some aspects of the SOR strategies that will help, but there are also some parts that we're not too excited about.

TPOR7-1

Basically, we oppose drawdowns and high spills that we've seen earlier this spring. We believe that rather than getting the high expenses for some of these questionable processes, we should spend some money on some other things -- specifically on the Recover 1 ideas that Bruce Lovelin talked about a little earlier.

I'll give my time to someone else after that.

MR. MOORE: Thank you. Our next commenter is Dave Clinton, and will be followed by Tom Mackay.

COMMENTS BY MR. DAVE CLINTON

MR. CLINTON: My name is Dave Clinton. I'm Assistant Manager of Inland Power & Light Company, headquartered in Spokane, Washington, serving Eastern Washington and parts of Idaho.

Today I want to represent the 20,000 families that we serve. I want to speak on their behalf, and tell you what I would think they would tell you if they were standing here

Responses

TPOR7-1. See Common Response No. 11.

Letter TPOR8

Comments

people. And it really doesn't need to be that way. There are options out there that I believe -- and I think they would believe -- provide the right balance between all those competing needs for the system.

TPOR8-1 I support, and I believe these 20,000 families collectively would support Recovery 1 because it provides that balance. It focuses the limited dollars that we have as a region on measures that work. We know that barging the fish -- a better smolt collection system at the upper end, and a better release system at the lower end, will work. And we're not gambling our members' money like we are on some of these other measures.

Radical changes in the river system, whether they're from drawdowns or flow augmentation, I think, at best, are a gamble, and they're not only gambling our members' dollars, but we're gambling, I think, the economy of the Region as a whole. And I just don't think that's acceptable and I don't think the 20,000 families that I speak for would find that as an acceptable alternative.

And so, I would just like to conclude -- I think I said "Recovery 1" but it's "Recover 1" from the Columbia River Alliance -- with my support and the support of the families being served by Inland Power & Light. I think it is the best solution before us right now, to get going quickly, that can be implemented quickly, and make a dramatic impact on salmon

Responses

TPOR8-1. See Common Response No. 11.

Letter TPOR9

Comments

at affordable levels that will keep the Bonneville Power Administration whole so that they can continue this responsibility well into the future. Thank you.

MR. MOORE: Thank you. Good timing. Our next commenter is Tom Mackay and will be followed by Jonathan Poisner. We now have seven commenters remaining.

COMMENTS BY MR. TOM MACKAY

MR. MACKAY: You've heard my comments before, but I think for the benefit of the group, I'll still read the enclosed letter.

My name is R. Thomas Mackay; I am the Vice-President of Finance for Agri-Northwest, a large irrigator located on the Columbia and Snake Rivers.

The proper management of the Columbia and Snake River systems is important to future generations, both human and wildlife, living in the Pacific Northwest. The seven strategies outlined in the draft SOR statement are inadequate to provide for salmon enhancement and the needs of a multi-use river system. The strategies which include drawdowns, spills and high flows from storage reservoirs, have high biological risks to salmon and enormous costs to the Region. Individuals advocating those strategies are content to roll the dice, even if the risks are high and the results may be devastating. They would then complain and advocate other measures. The Northwest salmon and the Region would continue its downward

TPOR9-1

Responses

TPOR9-1. See Common Response No. 11.

Letter TPOR9

Comments | **Responses**

TPOR9-1

spiral.

I would join the others in supporting Recover 1, and I'd like to mention some of its points. Make immediate improvements to the transportation and release of juvenile salmon -- and I mean immediate. Improvements may require increased equipment, changes to existing equipment, and changes in the release point. Improve the collection facilities at Federal dams in conjunction with the juvenile salmon transportation program.

Drawdowns will increase salmon mortality and decrease the likelihood of a successful recovery. Opposition to the risky measure must be part of a recovery plan. Spills and high-level flow augmentation reduce the effectiveness of the juvenile salmon transportation program, while increasing the mortality caused by high dissolved gas levels. Additional spills such as the one that occurred in 1994, should be avoided.

The management of the river system by the Army Corps of Engineers, Bonneville Power Administration and the Bureau of Reclamation, must be based on the best science and technology available. Political gamesmanship must be eliminated.

Two examples of this political gamesmanship are as follows: Governor Andrus of Idaho is striving to keep the Mountain Home Air Base open. The Base needs a bombing run.

Letter TPOR10 Comments

COMMENTS BY MR. JONATHAN POISNER

MR. POISNER: My name is Jonathan Poisner; I'm the Conservation Chair for the Sierra Club, Columbia Group. I am authorized to make these comments on behalf of the National Sierra Club, an organization with over a half million members, tens of thousands of whom live here in the Pacific Northwest. We will be submitting written comments later.

I'd like to thank you for the opportunity to testify today, but at the same time, I'd like to express extreme frustration regarding the disorganization and poor information that came out with regard to this hearing today. BPA issued a document which clearly indicated that there was going to be this hearing taking place last Friday, and indicating that the hearing today was to have been shifted to this evening; and this was confirmed orally over the phone with the BPA public information line, and wasn't -- we didn't find out that was incorrect until late last week. So, that partly explains, I think, why there are few in the environmental community here.

TPOR10-1

I'd also like to express frustration as to the timing of these hearings in Portland and Seattle. It is somewhat ironic that both of the hearings on the west side of the Cascades have been held in the middle of the afternoon when most environmentalists who are citizens like myself, simply can't afford to attend, unlike paid representatives of industry. Yet, on the east side of the Cascades, every single

Responses

TPOR10-1. See Response O3–1. The timing of the meetings in Portland and Seattle was based on past experience indicating that turnout would likely be higher for afternoon meetings in these locations.

Letter TPOR10 Comments

TPOR10-1

one of the hearings has been held in the evenings, perhaps convenient for citizens to attend. With that in mind, let me go on with the substantive comments.

First of all, the SOR alternatives are inappropriate and/or useless. SOR No. 1, Pre-ESA, is irrelevant at best and probably illegal. SOR No. 3, Flows; No. 5, Natural River; No. 6, Drawdowns, are all specific actions. They are not addressing the Columbia system as a whole in its operations.

TPOR10-2

SOR No. 2, Current; No. 4, Stable Reservoirs; and No. 7, Fish Agency Proposals, are not real-world alternatives. There is no analysis of the Columbia Basin Fish and Wildlife Authority's detailed fisheries operating plan, DFOP. The No. 7(a) alternative is only a short-term temporary step towards DFOP.

TPOR10-3

There is no analysis of the Northwest Power Planning Council strategy for salmon, and there's no analysis of NMFS Snake River Salmon Recovery Team recommendations. These omissions raise disturbing questions as to why the agencies would release the draft before completion of salmon recovery planning by the Northwest Power Planning Council and/or NMFS.

TPOR10-4

Second, the SOR excludes from consideration in the analysis all Snake River water above Hells Canyon and all non-treaty storage agreement water. During scoping, the agencies were repeatedly told to include this water in the analysis. That exclusion is illegal.

Responses

TPOR10-2. See Common Response No. 2.

TPOR10-3. See Common Response No. 1 and Response S11-1.

TPOR10-4. See Common Response No. 3.

Letter TPOR10 Comments

TPOR10-5

Third, the analysis that's included tends to be inadequate and flawed, and I'll give a few examples. The SOR does not contain any biological modeling and analysis for the State fish agencies and the tribes. It only includes the CRiSP and PAM models. Therefore, the SOR analysis makes inaccurately optimistic assumptions about the effectiveness of the juvenile fish transportation program, and inaccurately pessimistic assumptions about salmon mortalities due to spill.

TPOR10-6

In addition, the draft SOR ignores all the comments and well-advised recommendations contained in Appendix S prepared by the U.S. Fish & Wildlife Service. The next revision of the SOR should incorporate Appendix S into its text, rather than relegating it to an appendix.

TPOR10-7

In addition, failure to defer to the biological knowledge and expertise of fish agencies and tribes led to Federal Court rulings against the SOR agencies with regard to the Endangered Species Act, and against the Northwest Power Planning Council under the Northwest Power Planning Act. The same failure here as in the SOR will render it illegal, too. And for this reason, Appendix C-2 on the juvenile fish transportation program, does not fulfill the Court's ruling last December requiring a full NEPA analysis regarding the barging of fish.

TPOR10-8

In addition, the economic analysis included in the SOR mixes and mashes agency budget impacts, local economic

Responses

TPOR10-5. See Response T1–4.

TPOR10-6. Appendix S remains a separate document because the Coordination Act Report is an independent evaluation required by law. The SOR work groups have reviewed and considered the USFWS recommendations, particularly with respect to anadromous fish, resident fish, and wildlife. The operation recommended by the fishery agencies and tribes, the DFOP, has been included in the Final EIS as SOS 9a. See also Response O3–11.

TPOR10-7. See Responses O3–10 through O3–13.

TPOR10-8. See Response O3–14.

Letter TPOR10

Comments

TPOR10-8

impacts, replacement costs and opportunity costs interchangeably, rendering their conclusions completely invalid. For example, the analysis strictly correlates recreation use with reservoir elevation. The SOR assumes, for instance, that if John Day pool comes down, boaters will simply stay on land and twiddle their thumbs, rather than moving upstream to McNary or downstream to The Dalles Reservoir, or choosing some other recreation which will have positive impact economically.

Another example -- the estimates of hydropower generation losses appear to have no basis whatsoever in fact. The SOR estimates that Snake River drawdowns, Alternative 6(a), will sap 229 megawatts at $131 million, while the Northwest Power Planning Council staff calculates just 25 megawatts and $21 million. You can discern nothing in

TPOR10-9

Appendix I of the SOR explaining these widely diverging figures. We do know where the data from the Northwest Power Planning Council comes from, but Appendix I provides no documentation for the models used in its analysis.

Fourth, the proposal in the SOR for a Columbia regional forum is, at best, duplicative of the role and

TPOR10-10

function of the Northwest Power Planning Council, which, under the Northwest Power Act, has already been charged with precisely those duties that the SOR proposes for the regional forum. The agencies should delete this proposal from the SOR.

TPOR10-11

Fifth, the chapters on the PNCA and the Canadian

Responses

TPOR10-9. See Response O3–16.

TPOR10-10. See Response O3–17.

TPOR10-11. See Responses O3–18 and O3–19.

Letter TPOR10 Comments

Responses

Entitlement seem muddled and inadequate. PNC Alternative No. 1, Termination, is really the no-action alternative -- not PNC Alternative No. 3, Renewal. Canadian Entitlement Alternative No. 4, No Agreement, is really the no-action agreement -- not the Alternative No. 1, which is listed as no-action.

TPOR10-11

In any case -- just another minute or so -- in any case, none of the alternatives' analysis for the PNCA or the Canadian Entitlement appears to have any relation whatsoever with the rest of the SOR. It stated that this is what drove the creation of the SOR, but one looks in vain within the rest of the SOR for seeing why they have to be combined and what the relationship betwe'n them is.

Sixth, this raises a more general problem in the SOR regarding the SOR agencies. The documents continually refer to links between the SOR, PNCA, Canadian Entitlement, the Corps system configuration study, BPA strategic business plan, BPA power sales contracts. All the documents refer to other processes for analysis of various relevant and related issues.

TPOR10-12

Yet none of the documents explains the relationship among these processes, and none of the documents actually perform the relevant analysis necessary to understand the relationships.

For example, the SOR does not consider the cost impacts or savings from operating the Columbia River system under flow-based power sales contracts. The two processes

TPOR10-12. See Responses O3–20 and O3–21.

Letter TPOR10 Comments

Responses

refer to each other, but they never actually conduct the analysis.

It appears that the agencies are conducting a shell game of multiple, duplicative processes which never analyze the basic issues; they generate reams of numbers and data but no answers. For this reason, we conclude that the agencies have not completed their NEPA compliance for the SOR, PNCA, Canadian Entitlement Allocation, SCS, strategic business plan, and/or the BPA power sales contracts. TPOR10-12

In summary, the agencies have not developed an array of real-world alternatives, and they have not conducted valid or accurate analysis. Therefore, the draft SOR is not ready to go to a final document. The public has had no real opportunity to review or comment on real alternatives analyzed in a valid way. Therefore, the Sierra Club urges the agencies to prepare a second draft Environmental Impact Statement for the SOR, and submit it again for public review and comment. TPOR10-13

Thank you.

MR. MOORE: Thank you. We have five commenters remaining. Next is Tom Winn, and will be followed by Whit Olson.

COMMENTS BY MR. TOM WINN

MR. WINN: Thank you very much. I'm Tom Winn, Administrator of the Oregon Wheat Commission. I'm also here today representing the Oregon Wheat Growers League, or maybe

TPOR10-13. See Response O3-23.

Letter TPOR11 Comments

Responses

know what the outcome is going to be.

I have heard mentioned by a number of interest groups here this afternoon that -- some saying that they -- because of rate impact increases or other impacts that the alternatives present, that the threat, if you will, is for them to move out of the Region. We simply don't have that option. We're not going to move. We're going to continue to have to move our wheat into export channels.

TPOR11-1

In the spirit of cooperation and expediency here today, I am not going to spend any time repeating what you've already heard earlier about the CRA plan on Recover 1. We've reviewed it; we support it; we believe that the decisions that have to be made here be made on sound science. Things such as drawdowns and high spill rates which have so far proven not to be scientifically valid, we believe are better addressed in the CRA proposal. Thank you.

MR. MOORE: Thank you. Our next commenter is Whit Olson and will be followed by Darren Coppock, I think.

COMMENTS BY MR. WHIT OLSON

MR. OLSON: Good afternoon. My name is Whit Olson. I am here today representing the Columbia River Towboat Association.

There was a lot of time and effort taken to explore and write the System Operation Review. One of the statements made in this review was that it may take a combination of

TPOR11-1. See Common Response No. 11.

Letter TPOR12 Comments

Responses

TPOR12-1

these different options to arrive at a solution. The Columbia River Towboat Association endorses Recover 1 plan proposed by the Columbia River Alliance for fish, commerce, communities, because it maintains a multi-use working river that maximizes salmon benefits.

TPOR12-2

Drawdowns are not good for fish and they're not good for humans. Looking at the drawdown alternatives, one of the concerns was that the smolt were not getting to Lower Granite Dam. A recent study by the National Marine Fisheries says that the fish are getting to Lower Granite Dam. If that is the case, then a drawdown of this dam is not necessary.

Drawing down the four Snake River dams 33 feet to increase flows, will lead to gas bubble disease in fish, which is more harmful than good.

The final drawdown alternative to a natural riverbed is devastating to resident fish and wildlife, recreation, hydro power, navigation and irrigation; and there is no guarantee that this will help the salmon. In fact, to spend 17 years to convert the dams at $5 billion, and another 10 years to alleviate the silt without any guarantees for the salmon recovery, is sort of ridiculous.

We are all moderate environmentalists. We want to see the salmon survive. There is a real awareness of this situation. Somewhere, though, common sense needs to prevail. Getting rid of the dams and trying to step back 200 years is

TPOR12-1. See Common Response No. 11.

TPOR12-2. Thank you for your comment.

not the solution. There's a lot being done now to improve habitat and there's a lot more that can be done. Design and installation of surface collectors at the dams in conjunction with fish transportation will enhance the fish population.

TPOR12-3

Steps need to be made to mark all hatchery fish, control predator fish and mammals. We also have to keep in mind that there is an El Nino effect in the ocean which has kept salmon away from our coastal rivers.

In conclusion, the Recover 1 plan offers a workable solution for the salmon and humans. Thank you.

MR. MOORE: Thank you. Our next commenter -- I hope I have your name right -- is Darren Coppock. And I'm sure you'll correct me if I didn't. And he'll be followed by Brad Yazzolino.

COMMENTS BY MR. DARREN COPPOCK

MR. COPPOCK: My name is Darren Coppock. I'm the Administrator of the Oregon Grains Commission -- a similar group to Tom's although a slightly different slice of farmers. In this case, our concerns are very much the same.

Grain exporting in the Lower Columbia is incredibly important to this Region's economy. Over the last two or three years, the Region has averaged 27 million tons of cargo exports out of the Lower Columbia and two-thirds of it has been grain. The figure that Tom mentioned -- about 40 percent grain that arrives here arrives on barge -- includes grain

TPOR12-3. See Common Response Nos. 4 and 5.

Letter TPOR13 Comments

Responses

can make that process, the better.

In particular, our concerns, like many others, are with the drawdown proposals, 5, 6, and 7. These are proposals that simply won't die in spite of concerns over extremely high economic costs, gas saturation in the river, concentration of predators in a smaller surface area in the river, damage to infrastructure, dewatering of habitat for resident fish and wildlife, damage to cultural resources that was pointed out in the slide show, and unknown benefits to the fish. It's a series of proposals that needs to be put to bed as quickly as possible. They failed the economic responsibility test; they failed the biological responsibility test; and they distract our efforts from things that would be more valuable for us to spend our time on.

TPOR13-1

So, I'd like to thank you for this opportunity to testify, and good luck.

MR. MOORE: Thank you. We have three commenters remaining. Our next commenter is Brad Yazzolino, and will be followed by Ken Canon.

COMMENTS BY MR. BRAD YAZZOLINO

MR. YAZZOLINO: Hello, my name is Brad Yazzolino. I'm an artist, and it's my purpose to look far back in time. Art has been with the human race a long time. And it's my purpose to look far into the future in time. That's what visionaries do.

TPOR13-1. Thank you for your comment.

Letter TPOR14 Comments

runs will take years to develop. Well, it's been 48 years since then, and you have not developed them. And I think that in general, the public would ask you -- I would certainly ask you, to somewhat realize, as managers of civilizations -- of America's civilization, you -- we are maturing as a civilization, and it's really your duty to take a long overview for -- if we think back about the Columbia River, 16,000 years ago, the floods were happening. That river managed itself for over 16,000 years, basically in form close to your Alternative 5, which I think is -- and my gut reaction is go with something like 5, even though everyone says it has devasting effects on some of the more recent predator fish -- "resident fish," as you call them. Of course it does, and of course it's going to have impacts on docks and on irrigation and all those sort of things, but you must see that those are all short-term effects, and that civilization in the long run would be best benefited by a river that is closest to its natural state, which is in -- you all laugh at it, but eliminating the dams is probably the answer over many hundreds of years. It's going to be a long struggle, but I'm sure that many of these dams which you all consider to be God-given rights, which are really only 50 years old, are going to disappear over the next 500 years, because that's what people want to see is a wild and free Columbia.

You can still irrigate and you can still have plenty

TPOR14-1

Responses

TPOR14-1. Thank you for your comment.

Letter TPOR15 Comments

Responses

and that is a multiple-use system. And as much as we may want to look back or look forward, I believe that Congress at that time, and still continuing today, is following a public policy that says that there are many benefits that can come from this type of system, and that what we need to do is, as you were mentioning earlier, find a balance that can allow that to happen as well as the other interests, specifically the salmon interest.

Therefore, we support -- since we're Columbia River Alliance members, we support the concepts that they have laid out for you today. Like Tom, I'm not going to spend a lot of time going through those, but I want to touch on just a couple.

TPOR15-1

One, we are very concerned with spill and what that does on gas super-saturation. We are very concerned with the drawdowns, specifically the concern because of the multiple impacts it has for all the river users, or most of the river users, and also on flow augmentation -- very concerned there, mostly because we seem to be operating now at a point where we're beyond any technical rationale, specifically as we focus on the Council's strategy for salmon, and also on the draft NMFS Recovery Team. Thank you.

MR. MOORE: Our next commenter is John Smets.

COMMENTS BY MR. JOHN SMETS

MR. SMETS: Yes, gentlemen, my name is John Smets.

TPOR15-1. See Common Response No. 11.

Letter TPOR16 Comments

Responses

of Kachess and Keechelus which, in turn, provide water all season long, and clear into the autumn, for these great vineyards and apple orchards and fruit orchards -- a great economy. These things these people forget because they don't have the experience -- of age and experience and even being on the river.

And so, that's what I want you to remember. Whatever decisions you make to preserve this water and manage it the best way you know how is the best way. In the future, I hope, you might invite -- or these other people might invite the people from Korea, from Japan, from Russia, and all the great countries that mine the oceans of the Columbia River fish, and don't come in here and offer to help cover the expense. These are the great problems which are not being faced, yet you people have to face them, and in many cases are not allowed to talk about them.

TPOR16-1

So, I would hope -- by the way, this being a free country, everybody has a chance to say what they please, and you provide this audience -- even for me, even for them. So, thank you very much.

MR. MOORE: Is there anyone else who would like to give formal testimony? Yes, sir?

COMMENTS BY MR. JOHN SAVIN

MR. SAVIN: I'm sorry, I thought I had signed up on one of the lists, but anyway, I'm John Savin. I'm the

TPOR16-1. See Common Response No. 6.

Letter TPOR17 Comments

that is, I will probably support you. And the reason for that is, I think a good decision needs to be made. The country simply has to get on with the right way of doing things. And for better or worse, you are the people who are sitting in those chairs that I'm talking to.

It would be very easy to put your head down and say, "Due to politics, due to who to this Senator, who is in the Administration, what is this Governor, et cetera?" You know, "Where is my boss sitting?" It would be a lot easier to say, "What is the safest approach?" And all I'm asking is to think about that future and how you want to be remembered, and to do something. Do something assertive. Take the bull by the horns and say, "By gosh, this is what I think we ought to do."

Come out to me at some point in time and let me know what that is. I'd be happy to give you comment and reaction. But I think collectively, we will be better off by you being as active and vigorous as possible.

As it relates to all of those piles of studies that I see there on the table, I think the real key issue to me is, "What is this forum?" Now, not so much what is the decision today, but how are we going to make decisions in the future. What represents a fair public process? And I personally believe that we have, based on reviewing that document, a lot of good scientific work, a lot of good evidence. I might submit a recommendation and support one that's perhaps a

TPOR17-1

Responses

TPOR17-1. Thank you for your comment.

TPOR17-1

little bit different than you have in there. But I think that is a good forum to be working in, through the three agencies that are represented at the table, as well as the others who I wish were here today.

So, I do wish you luck and I do stand by my claim that I will be supportive, whatever it is, but I think we need to get on with this.

Thank you.

MR. MOORE: Thank you. Is there anyone else who would like to give formal testimony at this time?

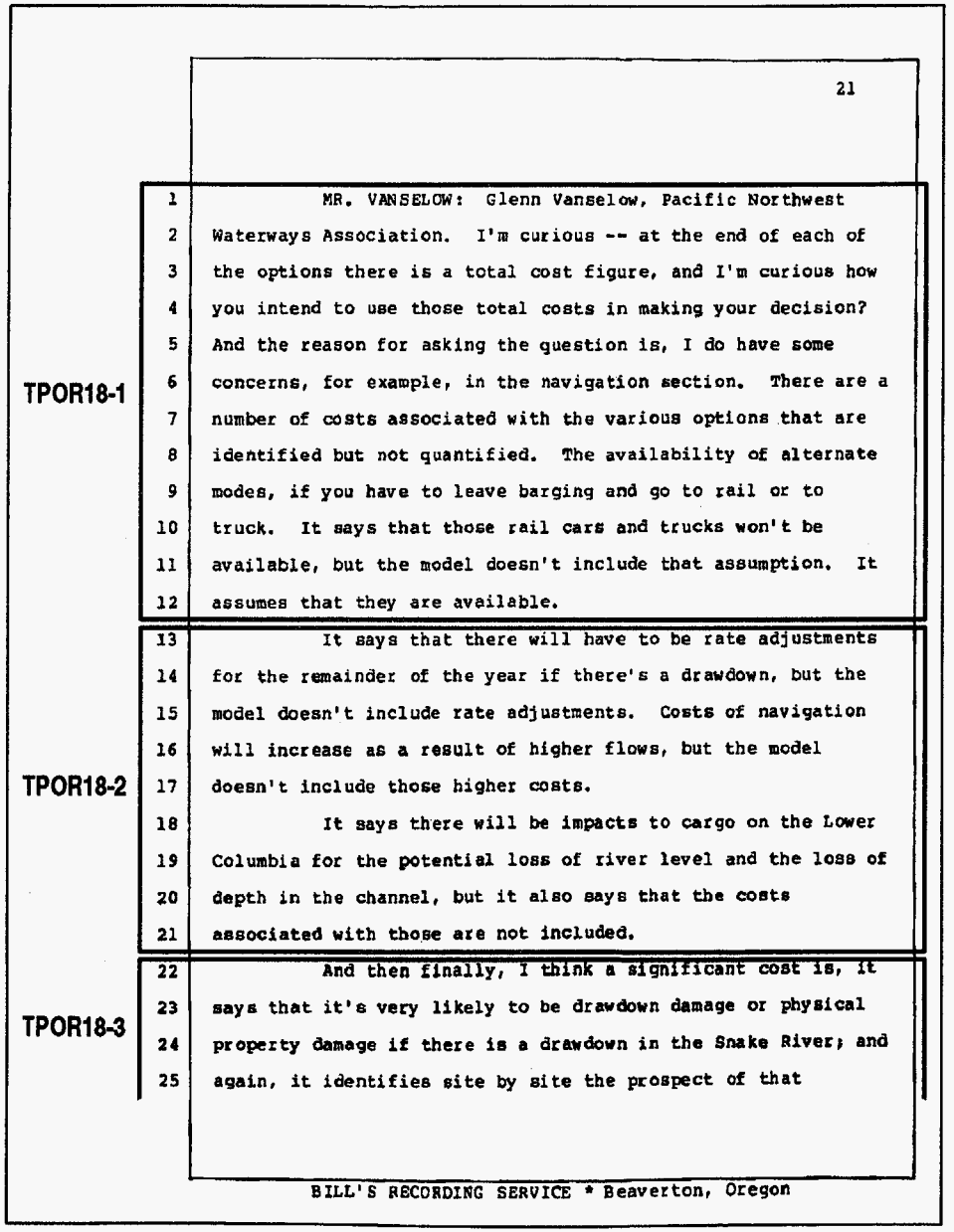
(No response)

MR. MOORE: Then we've reached the conclusion of our meeting. On behalf of the Interagency Team, I'd like to thank everyone for coming, and have a good day.

(Thereupon, at 3:27 o'clock p.m., the meeting was concluded.)

Letter TPOR18 Comments

Responses



MR. VANSELOW: Glenn Vanselow, Pacific Northwest Waterways Association. I'm curious -- at the end of each of the options there is a total cost figure, and I'm curious how you intend to use those total costs in making your decision? And the reason for asking the question is, I do have some concerns, for example, in the navigation section. There are a number of costs associated with the various options that are identified but not quantified. The availability of alternate modes, if you have to leave barging and go to rail or to truck. It says that those rail cars and trucks won't be available, but the model doesn't include that assumption. It assumes that they are available.

TPOR18-1

It says that there will have to be rate adjustments for the remainder of the year if there's a drawdown, but the model doesn't include rate adjustments. Costs of navigation will increase as a result of higher flows, but the model doesn't include those higher costs.

TPOR18-2

It says there will be impacts to cargo on the Lower Columbia for the potential loss of river level and the loss of depth in the channel, but it also says that the costs associated with those are not included.

And then finally, I think a significant cost is, it says that it's very likely to be drawdown damage or physical property damage if there is a drawdown in the Snake River; and again, it identifies site by site the prospect of that

TPOR18-3

BILL'S RECORDING SERVICE * Beaverton, Oregon

TPOR18-1. See Response O42–10.

TPOR18-2. See Response O42–10 and O42–11.

TPOR18-3. See Response O42–12.

Letter TPOR18 Comments

Responses

TPOR18-3

happening and the kind of damage that would be there, but it does not include the costs associated with that.

And so, if there are all these costs that have been identified, but are not included in the sum total of the costs associated with the option, I'm curious how you intend to use those cost figures in making your decisions.

MR. ANDERSON: I got three parts to your question. Let me try three parts. Your fundamental question -- how do we use the economic -- the numbers that tally up at the end. It's just simply one other measure or another measure of impacts of the various alternatives comparing between alternatives, which is important for display to the decision-makers.

Along with physical effects, loss of recreation days, numbers of fish, changes between alternatives, comparison -- or we can for some of the value measures, physical measures, we can put economic terms on that. And we're not suggesting that we can get 100 percent accurate on some of those projections. There are things that may not be in there.

In that regard, on the drawdown scenario which is what you're referring to, additional work is going to have to be done on drawdown to implement drawdown. We're doing some additional work, and if the Region chooses and we choose in the SOR process to pursue that option through the system

by the way, you want to look in Appendix O, Chapter 5 -- there's a section on that -- identifies by state the numbers of jobs lost by impact area.

MR. MOORE: Yes, sir, go ahead.

MR. SAVIN: I'm John Savin. I'm with Northwest Irrigation Utilities. This may be a follow-up to Dave Clinton's question.

With regard to some of the impacts -- I guess my concern is, many people view this as a "users of the river versus the salmon and the salmon advocate issue," and my concern, Phil, is not addressing some of these other implications directly and saying that there are other processes that will go on. It just doesn't leave me as comfortable as I'd like to feel.

TPOR19-1

For example, with regard to the impact on irrigation, there is a figure of about 8.6 million dollars, but that does not include the fact that Bonneville has suggested perhaps eliminating a low-density discount, totally eliminating an irrigation discount, so that the beginning position for the irrigators might be that power could be 25 percent or more higher than it is today, which absolutely puts them in a position of looking at alternative resources, which I might be involved in doing for them. And it is my view that those alternative resources have some fairly demonstrable effects on the environment compared to being a full require-

TPOR19-1. These types of power supply issues appear to relate more to the scope of BPA's Business Plan EIS, which was released earlier in 1995.

Letter TPOR19 Comments

Responses

ments customer of Bonneville.

I respect the opinion that only so much can be done in this process. What is unsettling to me is, I still have a feeling that it's the users versus the salmon, and somehow the negative consequences of the alternatives to being a full requirement customer of Bonneville are not getting the attention, or may not get the degree of attention that I think they deserve at the time the decision is being made.

TPOR19-1

MR. THOR: Yes. I'm not about to sit here and argue with you. I think you've got a very good point. That's the reason we're conducting this meeting in the first place and have a comment period. I hope you can put some of that stuff down in writing and identify specifically where you think we've under-estimated the costs.

It's our intention to make the final EIS as clear and as objective as we can, to be balanced in terms of its treatment of all uses. That's the only way the decision-makers are truly informed when they make the decision.

As for your other point which I think I read correctly -- we, the Federal agencies, may not be making this decision -- is that sort of what I was hearing? That we may be being driven by some other process or some other agency?

All I can say -- if that was your question, all I can say in response is, we, as Federal agencies, have a number of other laws and requirements that we must meet. Prime of

Letter TPOR20 Comments

Responses

TPOR20-1

The other thing that really bothers me is, I hear people talking about user groups and salmon. Well, there are a lot of user groups that I work with that are dependent on salmon, and our area's been devastated, especially this year. So, you know, remember those user groups, too.

I was quite upset at the summaries. None of the fishing groups are even mentioned in the effects. They are in the overall plan, I understand, and that's good, but the public sees these summaries. It would have been nice, I think, if there had been recognition that those people are also affected.

MR. THOR: Okay. Good comment.

MR. MOORE: It's time that we begin moving towards the formal testimony portion of the meeting. Is there anyone in the audience who has not yet asked a question who would like to do so?

(No response)

MR. MOORE: Okay. Let's go ahead and move to the taking of formal testimony. We have a microphone in the middle aisle. I'd like to ask each of you, when you give your testimony, to please go to that microphone. This is the official purpose of our meeting, is to get your formal comment, and that will guarantee that we are able to do so.

I'd like to recommend that we set a time limit of four minutes per each person to testify. I will watch the

TPOR20-1. The EIS included consideration of impacts on fishing groups under the headings of regional economic impacts and social impacts.

BEFORE THE
BONNEVILLE POWER ADMINISTRATION
U. S. ARMY CORPS OF ENGINEERS
BUREAU OF RECLAMATION
SEATTLE, WASHINGTON

PUBLIC MEETING

On The

COLUMBIA RIVER SYSTEM OPERATION REVIEW

(SOR DRAFT EIS)

Seattle Room,
West Coast Sea-Tac Hotel,
SeaTac Airport,
Seattle, Washington.

Tuesday, October 4, 1994.

Pursuant to Notice, the above-entitled matter came on for Hearing at 1:00 o'clock p.m.,

BEFORE:

A PANEL CONSISTING OF:

JAMES FODREA, Bureau of Reclamation - Opening;
HUGH MOORE - Facilitator;
PHIL THOR, Bonneville Power Administration - Member;
WITT ANDERSON, U. S. Army Corps of Engineers - Member;
JOHN DOOLEY, Bureau of Reclamation - Member.

I N D E X

Letter TSEA1

Comments

other than anadromous fish survival. But we all know that that's not a realistic option, and the Region doesn't want Option 1. The Region doesn't want Option 2. They all want something better than those options.

So, salmon recovery is the dominant issue. And I guess my quarrel with the SOS options as presented is because salmon recovery is the dominant issue, why you didn't choose an option for the public to comment on that actually provided salmon recovery. TSEA1-1

There is science today, as a result of the last three or four years of study by the Corps, study by NMFS, study by the Northwest Power Planning Council, University of Washington, that outline steps that we can take for salmon recovery, that I think could have been included as an SOS strategy.

There's a perception in the public that what we have is a choice to make in the Region between spending massive dollars for salmon recovery -- in recovering salmon, I should say -- or playing it safer for the farmers, the electric utilities, barge operators and others; and that concept is simply not true. The expensive options that we have in front of us for river operations include Snake River drawdowns, annual cost up to $450 million according to your SOR, resulting in reduced total survival of salmon from base case.

John Day drawdown to minimum operating pool --

Responses

TSEA1-1. To be more precise, the contributions of river system operations to salmon recovery, and not salmon recovery itself, became the dominant issue. Therefore, the SOSs included only operational measures, and not comprehensive recovery strategies.

Letter TSEA1

Comments

annual cost, $15 million from the SCS study. No meaningful survival increase.

Major flow augmentations in both rivers -- annual cost, up to $45 million. Little survival increase above a threshold.

And of course, there's always spills like we did this spring -- $20 million cost; reduced survival.

TSEA1-2 There are three actions we can take in the river that sound science indicates will increase salmon survival. A surface collector at Lower Granite -- annual cost about $15 million; 11 percent increase in juvenile survival.

TSEA1-3 Improved barge transportation and release strategies -- annual cost, $4 million; 4 percent increase in salmon survival.

TSEA1-4 Flow augmentation in the Snake River, up to a million and a half acre-foot threshold -- annual cost $20 million; 4 percent increase in survival.

These are the three actions we can take in river operations that will increase salmon survival. The most expensive actions that we outlined a moment ago all result in reduced juvenile survival. Thank you for the opportunity to comment.

MR. MOORE: Our next commenter is Pat Tucker, and will be followed by Dale Metz.

COMMENTS BY MR. PAT TUCKER

Responses

TSEA1-2. See Common Response No. 5.

TSEA1-3. See Common Response No. 4.

TSEA1-4. The SOR agencies, following the recommendations of NMFS, concluded that Snake River flow augmentation volumes should be higher than the figure stated in the comment.

Letter TSEA2

Comments

MR. TUCKER: My name is Pat Tucker. My family owns a river project on the John Day Pool right across from Boardman. We've been there 20 years. We came there and it was just a desert. The pool had been backed up for several years by the time we got there, and there were several farms going, but we took the big plunge and decided that we'd try to make a life down there.

When I saw the presentation and heard the narrative on that, there are a number of things on that particular presentation that I'd maybe like to take challenge on a little bit.

TSEA2-1

It opened up with a comment that there are too many demands on the Columbia River system, and I simply don't believe that to be true. I don't spend all my time studying that and that's not what I'm paid for, but I am here to defend the river users' rights.

The consumptive use out of the river, as I understand it, is less than 5 percent in the total system, which means that 95 percent of the water that comes into the drainage basin goes out into the ocean. I don't think that 5 percent is a large amount. I think that perhaps we could even use more than that.

I'm an irrigator; I think that the most valuable use of this water, of course, is growing crops and feed the world. You know, the people who are out there trying to choke us down

Responses

TSEA2-1. Thank you for your comment.

Another comment on the presentation that may be somewhat of an aside -- I wrote down in the dark with my pen that Option 5 had a net cost to irrigators of $2.6 million, and yet in the book it 8.6. I suspect that the 8.6 is the correct one. I may have listened wrong to the presentation. Next time it runs by, you might just listen for that. I think there could be a discrepancy there.

Another somewhat of an aside from our direct thing here, and I want to get it into the public comment at this point, is that, I don't know if maybe you fellows realize this, and I read this, and I believe it to be true, that had it not been for the irrigation storage in the Yakima River Basin this summer, that the Yakima River would be dry at this point; and that maybe the public needs to know that irrigation storage is providing water for that river system that would not be there. And the irrigators in that system are paying dearly for it by not having enough water.

TSEA2-2

I'd simply like to, in closing, support Mr. Mercer's statements on a surface collector at Lower Granite, improve transportation. I don't know if anybody's done any studies to see if we haul those salmon farther into the ocean if they'd survive better or not. But, you know, maybe something should be studied on that. And I thank you for listening to me.

MR. MOORE: Thank you. Our next commenter is Dale Metz, and will be followed by, I believe it's Jerry McMahon.

TSEA2-2. See Common Response Nos. 4 and 5.

Letter TSEA3

Comments

over 500 million, and that's a lot of money. I'm used to hundreds, you know. When you get to talking about these millions, I'm kind of out of place. But if that's some of the money that was spent, 500 million, to create those drawdowns, it seems to me that maybe -- maybe we could spend a little bit more money hatching a few more of these salmon, and maybe we can put so many in there that what gets killed going through the turbines wouldn't really add up to that bad.

TSEA3-1

I also heard them talking about the sturgeons, you know, becoming an endangered species, and they started limiting the catch of those and increasing the size that you could keep. When I was over in China a little over a year ago -- I spent 31 days over there -- and I was really surprised to see that they've got sturgeon hatcheries going over there in China, and they're hatching these things so they won't become extinct. Maybe we should do some of that here in America -- make some more hatcheries.

And I think there are a lot of things that we should consider. When you have these drawdowns, it does definitely affect recreation and affect the marinas. Thank heavens they've never drawn the McNary Pool down yet, but I heard them talking about it, and I would really be bankrupt if they did that because it would ruin my docks that are out there. I've spent about $2 million building a nice marina there in the Tri-Cities and been there for 40 years, and that would be the

Responses

TSEA3-1. Thank you for your comment.

Letter TSEA3

Comments

last thing I'd ever, ever want to see is my dock sitting on the ground.

I think that if we look back, these pools were -- and the dams were built for commercial navigation, irrigation and recreation, and I think all these things are very important, particularly the recreation, because we all live for one purpose, and that's to enjoy this beautiful earth that God created here. And when we just had the Columbia River here and the Snake River, no dams, no lakes, there was very little recreation out there. But since the beautiful lakes were formed in behind each dam -- which I take my hat off to the Corps of Engineers for making these projects so successful, and all the parks that they built on the shores. So, I think recreation is very important, because most of us only live for but one purpose, and that's to enjoy life on this beautiful earth.

TSEA3-2

So, we want to see recreation continue to be an important thing to all the public, and I think when you have these drawdowns and it affects the marinas, it's certainly affecting their incomes. So, I'm definitely opposed to the drawdowns. I don't even like the looks of them, I don't like the smell of them, and I hope it never happens again. Thank you very much.

MR. MOORE: Okay, our next commenter is Jerry McMahon and will be followed by Victoria Silverman. We have

Responses

TSEA3-2. Thank you for your comment.

Letter TSEA4

Comments

involved in and committed to salmon survival programs. Through our participation with the Corps of Engineers in the juvenile fish transportation program since 1981, has been one of the successes of salmon protection.

The Columbia River System Operation Review, aimed at developing a coordinated strategy for managing the multiple uses of the Columbia River system, is an extremely important process for salmon protection. It has been open to the public and it has been largely objective in its task of assembling and presenting the facts.

TSEA4-1

The seven proposed System Operating Strategies of the draft EIS come to one fundamental conclusion, and I quote from your document: "Juvenile fish transportation emerged as the most important factor for juvenile fish survival in the next five to ten years." The natural river operation, or the alternative, I think, No. 5, only has the potential to equal or possibly improve in-river survival, and it would take 17 years to accomplish this at a cost of $4.9 billion.

TSEA4-2

Gentlemen, we must end the studies. We must end the hearings now, and move ahead with action which will produce results to save the salmon. Our options for action and moving ahead are clear. First, as Bud Mercer indicated, we need to improve and expand the juvenile fish transportation program by adding more barges and taking the fish further down the estuary.

Responses

TSEA4-1. See Common Response No. 4.

TSEA4-2. See Common Response Nos. 4, 5, and 12.

TSEA4-2

We need to begin to design, test and implement a smolt surface collection facility at Lower Granite Dam to work in conjunction with the already effective fish transportation program.

And third, we need to eliminate higher flow regimes in reservoir drawdowns as obstensible salmon recovery measures.

Our industry believes that the alternative Recover 1 developed by the Columbia River Alliance, is the proper answer. It's not the perfect answer to the challenge of getting started with our task of saving Northwest salmon.

The time is too little and the stakes are too high for the salmon and for the health of the regional economy to continue to delay, and be distracted by flow and drawdown alternatives that have no proof that they will succeed in the long run, and an abundance of proof that they will not work in the short-run of five to ten years. Beyond that is too late.

Thank you.

MR. MOORE: Our next commenter will be Victoria Silverman and will be followed by Francois Forgette.

COMMENTS BY MS. VICTORIA SILVERNAEL

MS. SILVERNAEL: It's Victoria Silvernael, and I --- (interrupted)

MR. MOORE: Oh, I'm sorry.

MS. SILVERNAEL: That's fine. And I own a

Letter TSEA5 Comments

Responses

restaurant in the City of Richland that I've owned for 12 years. I understand I'm at the end of the food chain but it really concerns me that the decision made by this inter-agency team to identify a preferred method in solving this issue, can ultimately affect me and my business and my community.

We are primarily an agricultural community. We heavily depend on the river for transportation, irrigation, hydroelectric and recreation. We need the leaders of this state and you as the inter-agency team to consider the ramifications of your decision to all concerned.

There have been groups that have done extensive research at an enormous cost to all of us. The SCS, the State, or the study of the Corps of Engineers, NMFS, the Recovery Team Plan, and a solution that has already been read here today which is Recover 1, increases the survival of the salmon and is cost-effective, to improve the transportation, to design and build a new surface collector, and finally limit river flow.

TSEA5-1

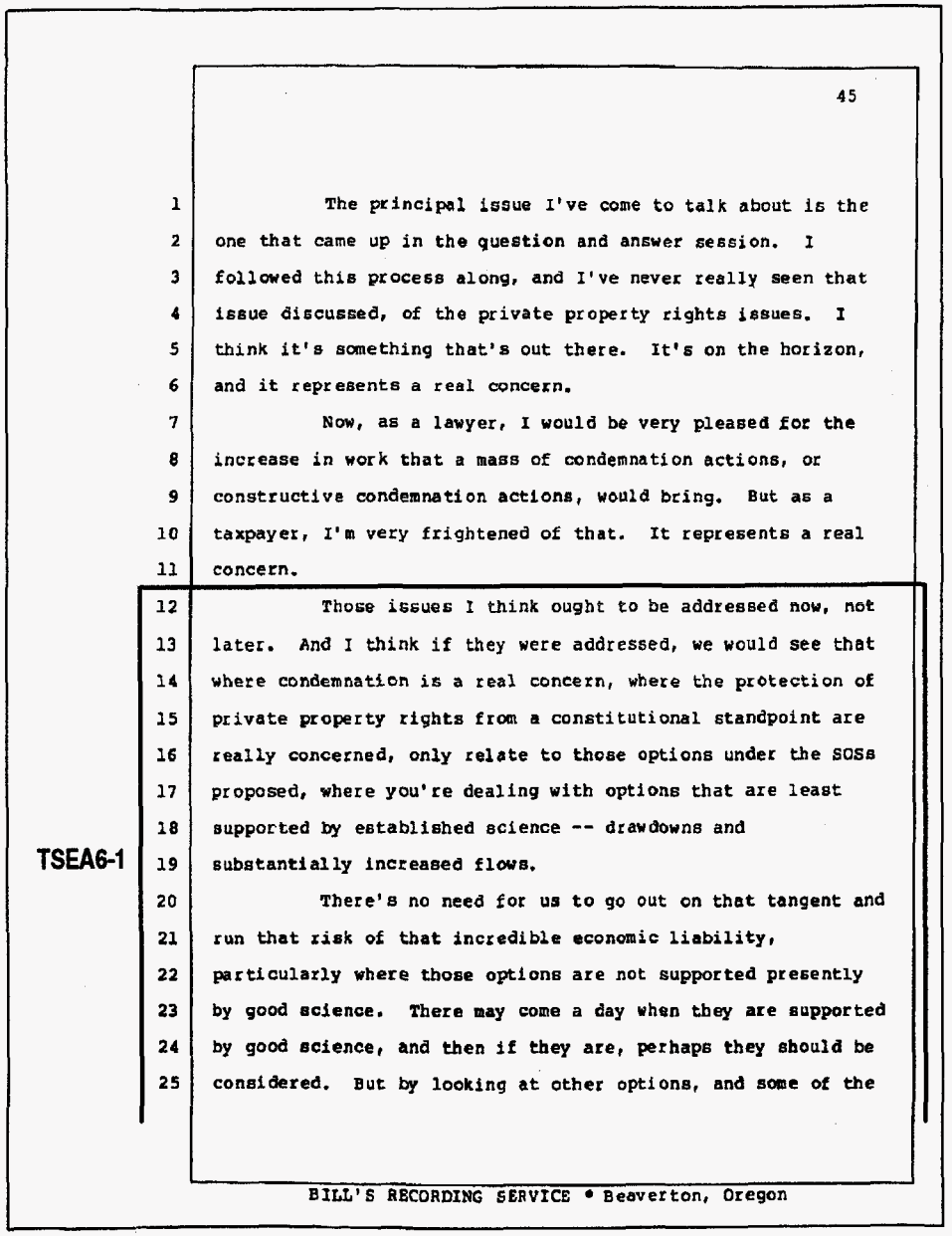
In this plan, I feel it addresses the needs of all of us -- irrigation and transportation for farmers, growing the product I need to be cost-effective, to keep electricity affordable, and still the survival of the salmon is met.

As a small businessperson, I see the decision of this issue affecting me, and I would hope that this team and eventually the legislators, consider the need of all of us,

TSEA5-1. See Common Response No. 11.

Letter TSEA6

Comments



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The principal issue I've come to talk about is the one that came up in the question and answer session. I followed this process along, and I've never really seen that issue discussed, of the private property rights issues. I think it's something that's out there. It's on the horizon, and it represents a real concern.

Now, as a lawyer, I would be very pleased for the increase in work that a mass of condemnation actions, or constructive condemnation actions, would bring. But as a taxpayer, I'm very frightened of that. It represents a real concern.

Those issues I think ought to be addressed now, not later. And I think if they were addressed, we would see that where condemnation is a real concern, where the protection of private property rights from a constitutional standpoint are really concerned, only relate to those options under the SOSs proposed, where you're dealing with options that are least supported by established science -- drawdowns and substantially increased flows.

There's no need for us to go out on that tangent and run that risk of that incredible economic liability, particularly where those options are not supported presently by good science. There may come a day when they are supported by good science, and then if they are, perhaps they should be considered. But by looking at other options, and some of the

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TSEA6-1

Responses

TSEA6-1. See Common Response No. 13.

Letter TSEA6 Comments Responses

options that have been mentioned here today -- the idea of the collector at Lower Granite; the idea of further enhancing the transport system; the idea of maybe augmenting flows up to a certain level -- I don't know what the experts call it -- maybe the efficient level or whatever terminology they have -- maybe we should look at those things. They certainly cost the least money; they certainly, based on good science, represent the greatest percentage increase and survivability of fish; and they certainly impact private property rights the least.

And we can talk about what it costs to modify that dam or this dam or those several dams. We can talk about what the impact might be to modify a few irrigation systems, or what the decrease might be in crop production for certain farmers in a particular year. But I think if you add up all the private property rights that are going to be impacted by this potentially, and recognizing the cleverness of some claimants and counsel to perhaps stretch the envelope as to what's a protected property right and what isn't, the numbers would be astronomical and dwarf these other numbers that are mentioned now.

TSEA6-1

So, I don't know at what point this panel should get to these underlying economic issues, but when we talk about impacts and remedial steps and things, that magic word, "condemnation," is never brought up. And I can understand why. I mean, the Government never wants to talk about

TSEA6-1

condemnation because there is implicitly some obligation to pay if there is a taking. But we can't set this aside as a sacred cow subject because we're talking about lawsuits or liability. I mean, this has to be brought up and dealt with up front, because this is a constitutionally protected right. It is something that must be compensated if it's a private property right that's being taken for a public purpose. Better address it now, because otherwise, at the end of the parade, the whole thing may end up in the courts for a long, long time. And that's not in the best interest of the salmon or the public or your agencies.

My last comment is, I want to thank the Bureau -- rather, I want to thank the Corps of Engineers. Their parks are the best parks in our part of the country. Thank you.

MR. MOORE: Our next commenter is Raymond Isaacson and will be followed by Jerry Weiser.

COMMENTS BY MR. RAYMOND ISAACSON

MR. ISAACSON: My name is Raymond Isaacson. I live at 2106 Lee Boulevard in Richland. I am an elected County Commissioner from District I in Benton County, and I have a responsibility to my constituency to protect their interests economically, environmentally, and to meet the requirements under the statute to provide for their safety and welfare.

As I've gone through the literature here, I am kind of surprised with what I find in your publications. As an

Letter TSEA7 Comments

Responses

Economic Costs for Snake River Salmon Recovery Measures," in their CRA report given in Portland, Oregon this year.

TSEA7-1

Those are some of the things that I would point to in terms of looking at alternatives, that should be included in your SOS cases. I don't find that in your SOS cases. My question is, why not? In other words -- apparently, you have not gone to the extent of looking at all the alternatives that might really be useful, and have limited your studies, and all of a sudden you've closed the book -- you've closed the door and you've said, "Now we're going to go to public hearing," and you're not ready for public hearing. Because there are approaches here that can show measurable successes.

And last but not least, as I discussed earlier, I am concerned about the socio-economic impacts because we are an emerging agricultural growth area, and we are providing quality products literally worldwide. Washington State produces the most apples; Washington State produces the most cherries; Washington State produces the most asparagus; Washington State produces the most wine grapes next to California, and so on down the line. 95 percent of the hops were raised in the Yakima Valley, as an example. It's not quite that high anymore because there are some other countries that have started raising them.

What I'm saying is, Washington is an agricultural state, and that provides more jobs than any other single

TSEA7-1. See Common Response No. 2.

Letter TSEA8

Comments

Lower supermarket costs, lower power costs affect my monthly income. It maintains navigation which holds the cost of transporting the produce and the products of the area to the rest of the world so they can be sold competitively. And it seems to do this all without the negative numbers I see in this chart in your book; seems to have a positive financial impact to our economy.

Now, your decision should consider the impacts to the working people of the state and of the region -- jobs, food costs and taxes. And I'd like you to take a strong look at Recover 1. It seems to keep this all in mind. Thank you, folks. TSEA8-1

MR. MOORE: Is there anyone else who would like to give formal comment or testimony at this time?

(No response)

MR. MOORE: Then we've reached the conclusion of our meeting. On behalf of the Inter-Agency Team, I'd like to thank you all for coming, and have a good day.

(Thereupon, at 2:44 o'clock p.m., the hearing was concluded.)

Responses

TSEA8-1. See Common Response No. 11.

Letter TSEA9

Comments

in here -- this is a comparison between alternatives, so what you need to do is you need to go through the same analysis process for each of the river uses, the resource areas, in the same way.

I think Ed is right on, in the sense that this doesn't necessarily predict exactly how those costs would be borne or recovered. It's simply a comparison of different ways of operating the system, and to make sure that we uncover the effects of those different ways in a way that you can compare an apple to apple method --- (interrupted)

MR. FORGETTE: I appreciate that. I guess what I'm troubled by is that a lot of these options we're looking at -- these different SOS's -- we talk about doing this and doing that like we're playing some sort of a model on a bench top, and we're really dealing with a lot of private property rights -- water rights, real property rights and other rights, as we do this. What I'm wondering is, where in the process -- do we wait until the end? Where in the process does this combined panel address the impact to those private property rights? Because, if there are private property rights that are being unconstitutionally impacted, there's going to have to be compensation; and that number, if there is a number, and it's determined compensation is due, may blow the rest of these numbers out of the water. And if you wait until the end to deal with those private condemnation issues, I'm afraid we may

TSEA9-1

Responses

TSEA9-1. See Common Response No. 13.

TSEA9-1

have the cart ahead of the horse.

MR. ANDERSON: A couple of thoughts on that. I think one -- where you're aware of those issues, you should be pointing those out in this draft review.

The other point is raised about the -- and that's great. We need to have your testimony, and we have the record here of written comments on that, specifically the issues you're -- in areas you're speaking to. But the System Configuration Study for drawdowns will be the vehicle to carry out implementation if, through the SOR and the SCS and the other regional processes that Phil mentioned, lead to eventually the decision that drawdown is the way we want to go.

There's a whole lot more work that was referred to, in terms of NEPA work, Congressional authorization, sorting out who pays, and a lot of specifics on some of those plans that are not addressed at this point in time.

This again would be in essence, a programmatic overview of the system impacts to the entire hydro system, of those kinds of measures. To actually carry those out takes more steps than, say, are required for us next year to say, "We want to provide more flows from the existing hydro system as it stands now" -- let's say, operation of one of the storage projects. To implement drawdown, there's a series of steps that we have to go through.

Letter TSEA10 Comments

Responses

Mercer?

MR. MERCER: Bud Mercer. I don't want to make this into a debate or elaborate on it at great length, but the thought occurs to me that what Mr. Forgette is discussing could actually come in the manner of added costs to a farm operational use because that's what I'm familiar with.

TSEA10-1

If, in some process, a farm operation has to incur added costs because of an SOS and because there is some mitigation up front to mitigate that and make sure that the farm can continue to operate, and we assume at that point that everything is all right -- you'll absorb the added annual costs. What if ten years later that farm goes bankrupt and is no longer viable? Then was there a taking? Should he have been compensated for the value of his farm in the first place? How do you get to all those questions? Because I can see that happening. These are very marginal operations. And especially on the Snake River, in the case of drawdowns, it looks to me like bankruptcy would be imminent a few years down the road. And that's not discussed in the SOS or in the, I guess, economic appendix.

MR. MOORE: Thank you. Other comments, concerns, questions, either on this or other issues?

(No response)

MR. MOORE: Perhaps we've reached a time where it would be appropriate to move on to giving of formal testimony.

TSEA10-1. See Common Response No. 13. The postulated situation stated in the comment does not appear to have a clear cause–and–effect relationship to an SOS decision, given the time separation stated.