



IDAHO CHAPTER
THE WILDLIFE SOCIETY

NATIONAL HEADQUARTERS
SUITE 5176
3900 WISCONSIN AVE. N.W.
WASHINGTON, D.C. 20016

April 30, 1975
Schmeizer Lane
Boise, Idaho 83706

The Honorable Roy A. Taylor, Chairman
Subcommittee on National Parks and Recreation
House Committee on Interior and Insular Affairs
Longworth Office Building
Washington, D.C. 20515

Dear Chairman Taylor:

The Idaho Chapter of the Wildlife Society recently contacted you regarding the Hells Canyon Area, Idaho. We asked protection of this river and its canyon and supported HR 30 and further urged enactment of legislation that will achieve the desired protection of this natural heritage. Comes now a Federal Power Commission Draft Environmental Impact Statement regarding dams in that reach of the Snake River from Hells Canyon Dam downstream to the China Garden Damsite that truly alarms us and adds emphasis to the immediate need for legislation that will protect Hells Canyon. This draft environmental impact statement is a disservice, it glosses over environmental concerns and impacts and places heavy weight upon energy production at any cost.

At the risk of repetition of materials previously submitted to you, we cite the following factors upon which we base our rejection of the draft environmental impact statement as inadequate in the public interest:

1. The National Environmental Policy Act requires evaluation of all factors and alternatives which have merit that bear on a proposed action or program. This includes a "no-action" or, in this instance, a "no-dam" alternative to the proposed construction of dams in the canyon. We find no such alternative in the subject proposal. We would question, why is this so?

2. The Idaho Department of Health and Welfare have found that further daming of the Snake River with subsequent slack water pools would degrade water quality in the river below such structures and reservoirs to an extent that such waters will not meet Idaho State Water Quality Standards. The consequence of this degradation, among others, would adversely effect both the resident and anadromous fishery resources.

3. The proposed structures and reservoirs would eliminate approximately 75 miles of free-flowing river thereby impairing if not destroying important steel-head trout and chinook salmon spawning and rearing areas as well as excellent white sturgeon (a threatened fish species in Idaho), smallmouth bass, catfish and other resident fish habitat. It would likewise eliminate the excellent sport fishing now enjoyed by those who frequent this area.

Middle Snake River Project, FPC Draft Environmental Impact Statement
Idaho Chapter of The Wildlife Society comments, con't.

4. No clear statement is made on fish collection facilities nor what is to happen or be done with those fish which may be collected. The historical record of similar facilities at other dams now present in the Snake River is dismal. It prompts us to ask: why more of the same when failure has been the rule?

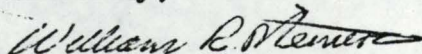
5. What is left of the Snake River as a free-flowing river provides an opportunity to enhance the anadromous fishery resource in the Columbia River System through utilization of large runs of hatchery stock. Further structures and reservoirs would destroy remaining natural runs and eliminate the potential attendant to hatchery stock reintroduction and manipulation.

6. The draft environmental impact statement is vague and does not adequately address the impact of large water impoundments upon wildlife resources. Effect of restricted and/or destroyed habitat is of critical concern. Both game and non-game species are involved wherein encroachment upon and inundation of lands essential to their survival is of utmost importance. There is a lack of factual data and analysis of impact that talks to this situation.

7. It is our opinion that the economic projection for energy development is a biased projection for development that does not adequately address the economic and other losses associated with other values over time.

In summary we find the draft environmental impact statement relating to the Middle Snake River Project No. 2243/2273, Idaho - Oregon - Washington a self-serving document that ignores no development as a viable alternative, that gives the option of selection among dams and that portrays the impacts involved in a superficial manner in both identity and analysis. We reject such a document as unacceptable in the public's interest and ask your help to secure protection of this canyon with early enactment of appropriate legislation that will secure the area. Thank you.

Sincerely,



William R. Meiners
President