FES 71-7

FINAL

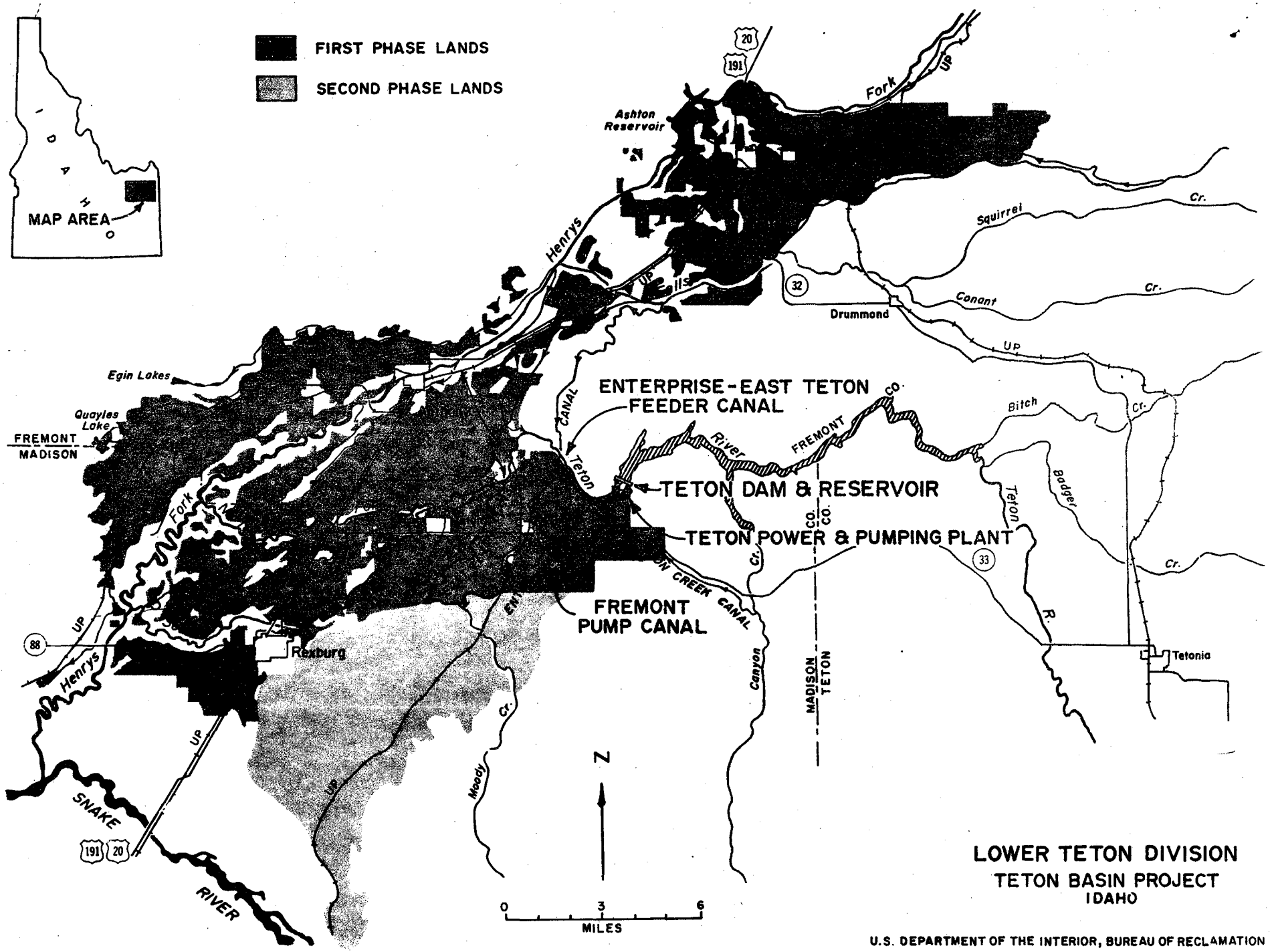
ENVIRONMENTAL IMPACT STATEMENT

L O W E R T E T O N D I V I S I O N

TETON BASIN PROJECT, IDAHO

JULY 1971

Bureau of Reclamation
Region 1
Boise, Idaho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SECOND PHASE LANDS
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Henrys
Squirrel
Cr.
Conant
Drummond
Egin Lakes
Quayles Lake
FREMONT
MADISON
ENTERPRISE-EAST TETON FEEDER CANAL
Teton
River
FREMONT
Bitch
TETON DAM & RESERVOIR
TETON POWER & PUMPING PLANT
Badger
FREMONT PUMP CANAL
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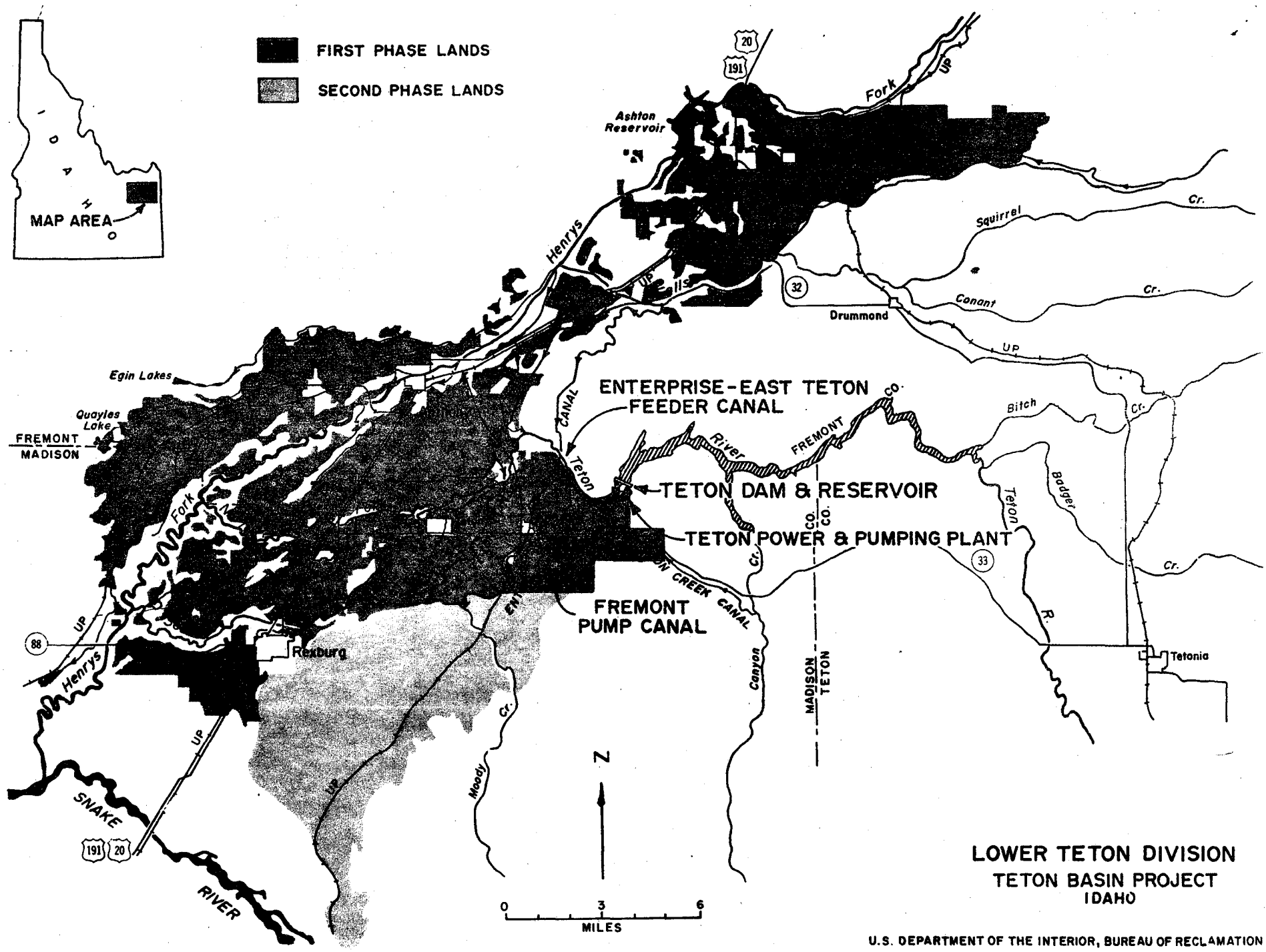
MILES
LOWER TETON DIVISION
TETON BASIN PROJECT
IDAHO
U.S. DEPARTMENT OF THE INTERIOR, BUREAU OF RECLAMATION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FINAL ENVIRONMENTAL STATEMENT
Lower Teton Division - First Phase
Teton Basin Project, Idaho
Prepared by Department of the Interior
Bureau of Reclamation
Region 1

I. General

Congress authorized the Lower Teton Division by Public Law 88-583 (78 Stat. 925), which was approved by the President on September 7, 1964.

This environmental statement for the construction of an earthfill dam, combined power and pumping plant, pipelines, canals, and wells is submitted in compliance with Section 102(2)(c) of the National Environmental Policy Act of 1969, Public Law 91-190. It follows guidelines for statements on proposed Federal actions affecting the environment as recommended by the Council on Environmental Quality in the Federal Register; Volume 36, Number 79, Part II, April 23, 1971.

The Lower Teton Division was authorized to be constructed in two phases; this environmental statement covers only the First Phase. An environmental statement covering the Second Phase will be prepared and distributed prior to submission of the Second Phase report. Where the potential Second Phase facilities have a common relationship with the First Phase facilities they are covered.

II. Description of the Project Area

A. Location

The Lower Teton Division is located near the confluence of the Henrys Fork and Teton Rivers, which are tributaries of the Snake River in Fremont, Teton, and Madison Counties in southeastern Idaho. The attached map shows the location and the major features of the Division.

Teton Dam, Power and Pumping Plant will be located on the Teton River in a deep canyon about 3 miles upstream of the canyon mouth. The damsite is 5 miles northeast from Newdale (population 272), about 12 miles southeast from St. Anthony (population 2,700), and 44 miles northeast from Idaho Falls (population 35,000).

B. Climate

The area has a semi-arid continental climate, characterized by wide seasonal variations in temperatures (104° - 50°) and annual precipitation ranging from 11 to 17 inches. July and August are the driest months with less than one inch of precipitation each.

C. Topography

The general terrain adjacent to the dam and reservoir site is a relatively flat plain intercepted by a deep narrow canyon about 27 miles in length. The canyon walls are very precipitous with numerous rock outcroppings. Terrain above the canyon rim is relatively flat benchland, primarily used for dryland farming and generally is devoid of tree or shrub growth. Vegetation in the canyon consists of native wild growth trees, shrubs, and grasses of principal value to wildlife, although a limited amount of livestock grazing is undertaken. The vegetative complex contributes to the aesthetic value of the canyon area. The lower end of the canyon opens into a wide valley of irrigated farmlands.

D. Vegetation

In many places, farmland adjacent to the canyon is cultivated to the canyon rim; therefore, wildlife food and cover is primarily restricted to the canyon. North-exposed slopes are covered with scattered stands of Douglas fir (Pseudotsuga taxifolis) and aspen (Populus tremuloides), interspersed with good bunchgrass cover and a few shrubs. The plant species on the south-exposed canyon wall providing winter forage for mule deer are: Juniper (Juniperus spp.), sagebrush (Artemisia spp.), rabbitbrush (Chrysothamnus spp.), bitterbrush (Purshia tridentata), and cheatgrass (Bromus tectorum). Vegetation is dense along the river bottom and predominant species are redosier dogwood (Cornus stolonifera), water birch (Betula fontinalis), chokecherry (Prunus virginiana), serviceberry (Amelanchier spp.), willow (Salix spp.), and currant (Ribes spp.).

E. Fish and Wildlife

The following game fish species are found in the stretch of Teton River influenced by the project: cutthroat trout (Salmo clarki); rainbow trout (Salmo gairdneri); brook trout (Salvelinus fontinalis); and mountain whitefish (Prosopium williamsoni). Nongame fish species include: mountain sucker (Pantosteus platyrhychos); Utah sucker (Catostomus ardens); speckled dace (Rhinichthys occulus); and longnose dace (Rhinichthys cataractae).

The fishery in the canyon portion of the Teton River has been rated by the Idaho Fish and Game Department as one of the finest in the State of Idaho and contains a self-sustaining population of cutthroat trout. The fishery is used mainly by float trip

parties during the summer season, since auto or foot access to the river in the canyon is difficult because of the sheer bluffs bordering the river and the lack of public roads to the canyon rim. The lower 3 miles is more accessible by road and is used more frequently by the local people.

Mule deer (Odocoileus hemionus) and elk (Cervus canadensis) inhabit the proposed Teton Reservoir area, and moose (Alces alces) are seen occasionally. Small numbers of big game are year-round residents. An estimated herd of 500 to 1,000 mule deer currently winter in the upper portion of the canyon. Big game migrate from Conant Creek, Fall River, and North Fork of the Teton River drainages to winter in Teton Canyon. The major concentration area for wintering animals extends from the mouth of Canyon Creek upstream to the mouth of North Fork of the Teton, all of which lies within the proposed Teton Reservoir pool.

Game birds, principally ruffed grouse (Bonasa umbellus), and mourning doves (Zenaidura macroura), inhabit the Teton River canyon. Beaver (Castor canadensis), mink (Mustela vison), cottontail rabbits (Sylvilagus spp.), river otters (Lutra canadensis), muskrats (Ondatra zibethicus), bobcats (Lynx rufus), skunks (Mephitis mephitis), and red foxes (Vulpes fulva) also inhabit the reservoir area.

The waterfowl population of the reservoir site is low throughout most of the year since more desirable habitat is available both above and below the canyon area. However, ducks and geese find sanctuary in the canyon during the hunting season, and it is used extensively during winter months when nearby water areas are frozen. The river in this reach constitutes the only open water in most of the Teton Basin during late winter.

There are no known rare or endangered plant or animal species in the Teton River drainage.

F. Recreation

The construction of Teton Dam and impoundment of the water would create a significant recreation area with fairly good public access. Presently, recreation use is limited primarily to summer fishermen who float the canyon reach of the river, fishing for cutthroat trout. There are no public camping or picnicking facilities in the reservoir area at the present time.

G. Historical and Archeological Sites

An archeological exploration of Teton Reservoir site was made in 1967 for the National Park Service by Idaho State University. In a report by Lorin R. Gaarder, Idaho State University Museum,

dated May 1968, it was noted that all areas of the canyon most likely to have been occupied by prehistoric man were explored but revealed very little cultural material and it was concluded that the canyon did not receive major use in prehistoric times.

There are no known significant historical events that took place within the project area.

H. Land Use Patterns and Economic Development

The deep canyon through which the Teton River meanders has sides which are very precipitous with considerable rock outcropping. The lands of the narrow river flood plain and adjacent benches are generally smooth, gently sloping, and consist of alluvial outwash or wind-deposited material. The benchlands above the canyon rim are now used primarily for dry farming, while the undeveloped lands of the canyon and narrow flood plain serve primarily as wildlife habitat.

Regional Director of Region 1 of the Bureau of Mines, by letter dated April 24, 1961, reported that there appears to be little mineral potential within the area of inundation by Teton Reservoir.

III. Project Plan

A. Need

The First Phase of the Lower Teton Division will (1) provide a supplemental and assured irrigation water supply to 111,200 acres, (2) produce electrical energy, (3) establish a water-based recreational complex with facilities for public use, and (4) provide flood protection, especially along the Teton River in the vicinity of Rexburg and Sugar City.

Teton Reservoir is a multiple-use storage facility and as such will alleviate both the drouth and flood problems associated with climatic conditions in area. Dry cycles of two or more years in a row which result in real water shortages may be expected once in 10 years on an average. Conversely, flood discharges large enough to produce general flooding in the valley can be expected an average of once every 5 years.

Water shortages on the irrigated lands were determined by an analysis of water deliveries and water rights. About 25,400 acres of irrigated lands in the Ashton area are chronically water-short and require a supplemental water supply to overcome frequent shortages ranging in severity from 25-70 percent. An additional 4,300 irrigated acres on the Rexburg Bench, in the Canyon Creek area, suffer acute shortages every year. The

remaining 81,500 acres of irrigated land, supplied by natural flow of Henrys Fork, Fall, and Teton Rivers augmented by existing storage, experience significant shortages in critically dry years.

Power production at the Teton Powerplant will be incidental to other uses and no water will be released for power purposes alone. Dependable capacity is estimated to be 12,900 kilowatts and the average annual energy production will be 92,300,000 kilowatt-hours. Any power surplus to project needs will be marketed through Bonneville Power Administration.

B. General Description of Key Features in the Project

Teton Dam will be an earthfill structure rising some 300 feet above the present streambed, with a crest length of 3,000 feet and a top width of 35 feet. The reservoir will hold approximately 300,000 acre-feet of water, extend about 17 miles up the canyon, have a shoreline of 50 miles, and a water surface area of 2,100 acres.

The power and pumping facilities will be located at the left downstream toe of the dam. The initial generating facilities will include two 10,000-kilowatt generating units with space provided for a third unit. The pumping plant will consist of six electrically driven pumps with a total capacity of 70 cfs with intakes screened to prevent fish entry.

Water will be pumped through a buried discharge line to the 2.5-mile-long Fremont Pump Canal which will carry up to 70 cfs of water to the existing Canyon Creek Canal. The 6.4-mile-long, 220 cfs, Enterprise-Teton Feeder Canal, which also originates as a pipeline at the Teton Dam, will be a gravity diversion from the dam. After the feeder canal pipeline leaves the canyon it will enter an open channel for conveyance to existing Enterprise and East Teton Canals.

About 27 ground water wells will be drilled, with an average depth of 400 feet, to tap the Snake Plain aquifer. The average lift per well is about 70 feet and the average yield is 15 cfs. Some water will be pumped directly into project facilities but the major pumping will be into the river system.

C. Environmental Protection Aspects Included in the Project Which Would Include Mitigation Features

Construction Specifications:

Specifications for the construction of the dam will include provisions to minimize water pollution during construction activities. The contractor will be required to comply with

all Federal and State laws and regulations concerning the control and abatement of water pollution. All waste and sewage material resulting from this operation will be disposed in a manner and at locations approved by Federal and State health agencies. Monitoring of the river water above and below the construction area will be performed throughout the construction period to detect any pollution or turbidity caused by the construction. Specification paragraphs covering water quality have been reviewed by personnel of the Water Quality Office, Environmental Protection Agency, and their comments have been incorporated in the specifications.

Minimum Flows:

The Federal Bureau of Sport Fisheries and Wildlife has indicated a need for 300 cfs flow in the Teton River at the St. Anthony gaging station for fishery purposes. This will require something over 300 cfs release from Teton Reservoir because of the seepage losses from the river in the 6-mile reach from Teton Dam to the St. Anthony gage. Under operations proposed in the authorized plan of development for the Lower Teton Division, during critical drouth periods such as occurred in the Upper Snake River Basin from June 1930-March 1938, it would have been necessary to reduce the minimum flow below the 300 cfs. Additional studies have now shown, however, that the flows of 300 cfs at the St. Anthony gage desired by the Fish and Wildlife interests can and will be maintained 100 percent of the time even during drouth periods by additional pumping from the ground water aquifer in exchange for Teton Reservoir storage.

Upstream Borrow:

During early design studies, following project authorization, it was proposed to borrow embankment material for the dam downstream from the damsite because of some savings in cost. About 6,000 feet of channel and adjacent flood plain would have received major environmental impact with the downstream borrow source. A major focal point of concern for nearly all environmental groups has centered about this downstream borrow proposal. Alternate borrow locations were reexamined in the light of the overall environmental factors and the plan is now to obtain the embankment materials from a borrow source within the reservoir area because of the adverse environmental impact of the downstream borrow.

Transmission and Switchyard Facilities:

An underground transmission line will connect the powerplant with the switchyard which will be located on the canyon rim above the left abutment. Since the switchyard will be of a "Low-profile" design and set back from the rim, these power facilities will not detract from the natural surroundings. Transmission facilities beyond the switchyard will be constructed by other agencies.

Field Station and Operators' Residence:

A field station consisting of a combination garage, storage and lab building will be constructed immediately downstream from the dam near the river outlet works and power and pumping plant. An operator's residence will be added to this facility later. Since the residence and construction field station are to be very close to the powerplant they should have little affect on the environment.

Roadway to Damsite:

The existing access road up the river to the damsite will be landscaped toward the end of construction to harmonize with the existing environment to as great a degree as possible.

Fish and Wildlife:

Approximately $1 million is included in the project estimate for mitigation measures to offset the impact of Teton Reservoir on fish and wildlife resources. Included in the plan are spawning facilities and hatchery ponds, fishscreens at new and existing canal headings which have not been screened before and the intake to the pumping plant, wildlife protective fencing, browse planting on 700 acres and acquisition of 430 acres for wildlife habitat. These measures have been included in the project plan at the suggestion of the Bureau of Sport Fisheries and Wildlife. Any other mitigation and restoration measures which appear feasible including purchase of additional big game range will be considered.

Temperature Study Based on Reservoir Limnology:

Preliminary information from a study now underway indicates that downstream water temperature patterns below the reservoir can be provided nearly duplicating natural river temperatures.

IV. Evaluation of Environmental Impact

A. Probable Impact of the Proposed Action on Environment

1. Teton Reservoir will inundate about 17 miles of free-flowing river and surrounding canyon landscape.

2. Approximately nine million cubic yards of selected earth material will be used to construct the dam.

3. Two short sections of canal will be constructed under the First Phase Plan.

Water will be pumped through a buried discharge line to the south canyon rim, and enter the 2.5-mile-long open Fremont Pump Canal carrying 70 cfs of water to the existing Canyon Creek Canal.

The 6.4-mile-long, 220 cfs, Enterprise-East Teton Feeder Canal originating at the Teton Dam will be a gravity diversion from the reservoir and will consist of buried pipeline which leaves the canyon about 5,000 feet downstream from the dam. The pipeline will be placed in the bottom of the canyon and the cover will be revegetated as necessary. After this conduit leaves the canyon it will enter an open channel for conveyance to the existing Enterprise Canal and to the East Teton Canal.

4. The reservoir operating pool will probably reduce much of the key winter game range for mule deer, especially between the North Fork of the Teton River and Canyon Creek. The prime winter game range is typically located on the north rim of the canyon, i.e., the south-facing slope.

5. The construction of the Lower Teton Division will augment the ground water aquifer in the Snake Plain.

6. The present project plan will maintain a minimum riverflow of 300 cfs at the St. Anthony gage as requested by the Bureau of Sport Fisheries and Wildlife.

7. Nitrogen supersaturation will not be a problem as operation studies for a 40-year period indicate there will be no flows over the spillway. Releases will be through the powerplant and auxiliary outlet works. The spillway will be required only to pass floodflows which would be greater than any that occurred during the 40-year period of record.

8. A preliminary study has been undertaken to compare natural water temperature regimes of the river to those that can be provided by releases from the reservoir. Preliminary results indicate that water temperature patterns can be provided nearly duplicating natural river temperature regimes. This can be accomplished by mixing colder epilimnion water through the powerplant outlet with warmer hypolimnion water through the auxiliary outlet without modifying the existing design. Therefore, no significant increase or decrease in water temperature regimes are expected with the dam.

9. A combination power and pumping plant will be built immediately downstream from the dam along with a field station. The field station will consist of a combination garage, storage and lab building from which on-site supervision of construction activities will be administered. Towards the

end of construction, a residence will be added to this facility to house the permanent operator.

10. A switchyard will be located on the canyon rim above the left abutment. An underground transmission line will be constructed from the powerplant to the switchyard. The switchyard will be a low-profile design and set back from the canyon rim.

11. Additional irrigation surface and subsurface return flow to both the Teton River below the dam and the Henrys Fork River is expected with the project. No significant deterioration in water quality is expected because of the increased minimum flows during the irrigation season offsetting inorganic (silt) and dissolved materials transported by the irrigation return flows.

12. The First Phase will include 27 ground water wells which will tap the Snake Plain aquifer. The deep well pumping facilities to be constructed will be utilized only in years when there is insufficient water in Teton Reservoir and/or insufficient natural flows to provide project water requirements without infringing on existing water rights of downstream users.

    Studies indicate the well water to be of high quality and five wells have been drilled and test pumped to insure that the project wells will not have any adverse effects (1) on existing ground water use either locally or elsewhere from the Snake Plain aquifer, or (2) on the existing subirrigation carried out in the Egin Bench area of the Lower Teton Division west of the town of St. Anthony.

13. A rather substantial amount of silt pollution from the adjacent dry farmlands occurs during spring runoff into the canyon portion of the Teton River. The reservoir will act as a silt trap and improve the water quality in the river below the dam.

14. During construction of the dam, the area within the reservoir will be cleared of all trees, brush, and other material which would be objectionable if inundated by the reservoir. Disposal of this material will be subject to the Idaho State Regulations governing water and air pollution.

15. All borrow areas outside the impoundment area will be reshaped to blend into the natural surrounding and to facilitate restoration of native vegetation in order to restore the aesthetic values.

16. The construction of Teton Dam and impoundment of the water will create a significant recreation area. Present recreational utilization of the Teton Reservoir site is minimal due to difficult access to the canyon, caused by sheer bluffs which border the river. Except for the recently constructed access road only one road now leads to the river in the 17-mile reach.

    The recreational development plan envisions a varied-use pattern. There will be day-use facilities and overnight accommodations. The proposed development was recommended by the National Park Service to meet foreseeable recreation needs commensurate with the potential inherent to the reservoir site. In reviewing the proposed development plans the National Park Service and the Idaho Department of Parks projected annual-use figures of 85,000 recreation days initially (first 10 years) building up to 195,000 days by year 40 of project operation. Development of the initial recreation facilities will be a cooperative venture financed jointly by the Bureau of Reclamation and the Idaho Department of Parks. The State of Idaho has agreed to finance future expansion as the need arises and as State funds are made available.

    Included in the initial construction phase will be the acquisition of about 122 acres of land exclusively for recreation use and the development of one recreational complex.

17. Although a cutthroat trout fishery will be lost through the creation of the reservoir, the Bureau's experience at other reservoirs in Idaho, such as Island Park, on the Henrys Fork River and Anderson Ranch on the south fork of the Boise River, indicates that a good reservoir sport fishery for species such as rainbow trout, kokanee, and perhaps cutthroat trout can be developed. The project plan calls for spawning facilities and rearing ponds to be provided at suitable locations to meet this need.

B. Adverse Environmental Effects Which Cannot Be Avoided Should The Proposal Be Implemented

1. A 17-mile stretch of self-sustaining stream cutthroat fishery will be inundated by the reservoir.

2. About 17 miles of scenic canyon bottom landscape will be inundated by the reservoir. Most of this landscape has no manmade development. Livestock use is light in the canyon.

3. The game range carrying capacity for the 500-1,000 wintering mule deer will be substantially reduced by the reservoir.

4. The 17-mile canyon stretch of the river provides open water resting area for local waterfowl through much of the winter. Ice cover on the reservoir during the winter will eliminate waterfowl use.

C. Alternatives to the Proposed Action

1. No development. The canyon portion of the Teton River would remain in its free-flowing condition and there would be no loss to the self-sustaining cutthroat fishery. There would be no damage to the mule deer winter game range in the upper part of the canyon. The scenic canyon and river valley would remain in its natural state. There would be no full irrigation and supplemental irrigation water available. Flood damage would continue in the valley below the proposed damsite. Electrical power would have to be supplied from another source. Recreational opportunities provided by the proposed reservoir and improved downstream flows would not be realized.

   After considering the damage to the free-flowing river and scenic canyon, and the possible loss of trout and damage to range for wildlife in contrast to loss from possible flood damage and foregoing power production, the expansion of recreational opportunities and the economic advantages to productive lands through an assured water supply, it was concluded the benefits from the dam and reservoir would outweigh the potential losses.

2. Full irrigation water supply by ground-water pumping. An irrigation water supply for all lands in the proposed development cannot be obtained wholly by ground-water pumping. This was brought out in the June 1964 Hearings before the House Subcommittee on Irrigation and Reclamation on the Lower Teton Division.

   However, with development of that portion of the project which could be realized through ground-water pumping alone, without Teton Reservoir storage, the canyon portion of the Teton River would remain in its free-flowing state and there would be no loss to the self-sustaining cutthroat fishery. There would be no damage to the mule deer winter game range in the upper part of the canyon. The scenic canyon and river valley would remain in its natural state. Flood damage would continue in the valley below the proposed damsite. Electrical power would have to be supplied from another source. Recreational opportunities provided by the proposed reservoir and improved downstream flows would not be realized.

During dry years (9 years out of 34 years of record studied) about one-half of the water supply would be furnished by pumping. Of the total requirements for the years studied only about 2.5 percent could be expected to be furnished by pumping from ground-water supplies.

3. Flood control in the lower Teton Valley by levees. The canyon portion of the Teton River would remain in its free-flowing state and there would be no loss to the self-sustaining cutthroat fishery. There would be no damage to the mule deer winter game range in the upper part of the canyon. The scenic canyon and river valley would remain in its natural state. A source of borrow material for the levee would have to be found. Tributary flows accumulating

behind the levee system would require additional handling facilities. Levees would not alleviate ice jam type flooding now prevalent in the area. Electrical power would have to be supplied from another source. Recreational opportunities provided by the proposed reservoir and improved downstream flows would not be realized.

4. The proposed action - Multipurpose dam and reservoir with a full range of environmental considerations. These considerations include:

   a. Minimum flow of 300 cfs in Teton River at the St. Anthony gage;

   b. Borrow material upstream within the reservoir area rather than from downstream source to retain as much of natural meandering river and landscape as possible;

   c. Provide water temperature in the Teton River below the dam to maintain natural patterns to extent possible;

   d. Low profile switchyard, underground transmission line, field station and residence, and combined power and pumping plant located and designed to minimize harmful visual impact in vicinity of the damsite;

   e. Purchase winter game range in vicinity of project to partially minimize losses. Investigate possibility of additional land purchase for a more equitable tradeoff;

   f. Landscape roadway built to damsite to minimize impact;

   g. Build fish hatchery to supply a reservoir sport fishery;

   h. A 17-mile canyon portion of the Teton River would be inundated by the reservoir;

   i. Irrigation and supplemental irrigation water would be available to downstream users;

   j. No additional pollution problems are anticipated with return flow from the project;

   k. The risk of flood damage in the lower Teton Valley and Henrys Fork Valley will be minimized by the project;

   l. Electrical power will be available on and off the project. The project is not designed to produce peaking power so there will be no wide daily fluctuations in downstream flow patterns due to power operations;

m. Recreational opportunities will be provided at the reservoir, replacing that lost because of the project, and providing increased recreation opportunities.

D. The Relationship Between Short-term Uses of Man's Environment and the Maintenance and Enhancement of Long-term Productivity

1. During construction the reservoir area in the canyon will be cleared of woody and brushy vegetation resulting in a temporary unpleasant visual impact. This area will be subsequently inundated and although the reservoir pool will fluctuate, the visual impact will be lessened following the filling of the pool.

2. With water storage and silt retention in the reservoir during high flow periods and augmented flows downstream during natural low flow periods, we can expect a significant improvement in the Teton River water quality below the dam.

3. During construction of the earthfill dam, every effort will be made to minimize silt pollution. Specifications have been prepared to require the contractor to control erosion during the construction process. However, since the "state of the art" controlling erosion during construction is in its infancy, perfect control cannot be expected. Following completion of the project, we do expect the reservoir to act as a silt trap, with improved water quality expected below the dam.

E. Irreversible and Irretrievable Commitments of Resources Which Would Be Involved in the Proposed Action Should It Be Implemented

A 17-mile stretch of free-flowing river and adjacent scenic canyon land will be inundated by the reservoir. In the 17 miles, self-sustaining stream cutthroat fishery will be eliminated. The habitat for game and nongame species of animals will be eliminated within the 17-mile-long empoundment below the reservoir water level. The carrying capacity for mule deer will be substantially reduced by flooding key winter game range on the north rim of the canyon.

F. Project Changes Made Following Review Comments of Draft Environmental Statement on Lower Teton Division, Teton Basin Project, Idaho, Dated April 1971.

1. Change in format of Environmental Statement to conform with format outlined in April 22, 1971, letter from Commissioner on "Flow Process in Handling Environmental Statement."

2. Downstream borrow area eliminated:

   Draft of Environmental Statement of April 1971 showed intent to borrow material in canyon bottom downstream from damsite. Plan now is to obtain these materials from the reservoir area because of adverse environmental impact of downstream borrow.

3. Minimum flow:

   Original plan contemplated minimum flow of 150 cfs in Teton River at St. Anthony gage. This has now been changed to 300 cfs to meet requirements specified by fish and wildlife agencies.

4. Acquisition of Additional Big Game Habitat:

   Original plan contemplated expenditure of approximately $1,000,000 to partially mitigate Fish and Wildlife losses. This included the purchase of 430 acres of wildlife habitat and browse planting on 700 acres and wildlife protective fencing. It may be possible to further mitigate wildlife losses by purchase of additional wildlife habitat.

L E T T E R S O F C O M M E N T S

ON

DRAFT ENVIRONMENTAL

IMPACT STATEMENT

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
Room 345, 304 No. 8th Street
Boise, Idaho 83702

April 27, 1971

Mr. H. T. Nelson
Regional Director
Bureau of Reclamation
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

We have reviewed the environmental statement for the Lower Teton Division of the Teton Basin Project, Idaho, with our field personnel. We would like to bring to your attention that there is no mention of land treatment needs or plans above the dam. There are approximately 263,000 acres of cultivated land above the dam. A major portion of this cultivated land is dry crop. Soil losses in some of the areas have been measured at over 200 tons per acre. There is the possibility of very heavy silt deposits building up behind the dam if land treatment measures are not used.

The water from the reservoir will be used to irrigate land not previously irrigated. This will necessitate the building of canals, ditches, additional roads, farmsteads, etc. There is no mention of erosion control measures that should be used in conjunction with this development.

Three soil conservation districts in the area and their concern about the effect of land use above the reservoir precipitated the formation of a multi-county resource council. This council is composed of county commissioners, city councils, and soil conservation district supervisors who want to do some resource planning on the land above the reservoir. This group could be very effective in promoting the proper land treatment measures to reduce erosion and sediment in the dam. There are no other active planning groups in the area, and this multi-county resource council is the logical group to work through, we believe.

Because of the economics of dryland land treatment measures, many of the land owners probably will not be able to apply conservation and environmental practices as rapidly as would be desirable. It would be good if these types of practices could be included as part of the project.

If you need additional information, please get in touch with us.

Yours truly,

(acting)

Guy W. Nutt
State Conservationist

DEPARTMENT OF THE ARMY
NORTH PACIFIC DIVISION, CORPS OF ENGINEERS
210 CUSTOM HOUSE
PORTLAND, OREGON 97209

NPDPL-FW

30 April 1971

Mr. H. T. Nelson, Regional Director
Region 1, Bureau of Reclamation
P.O. Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

The draft environmental statement for the First Phase of Lower Teton Division, Teton Basin Project, Idaho, furnished by your 2 April 1971 letter, has been reviewed with respect to the impact that the project would have on areas of Corps of Engineers responsibility and interest.

The flood control benefits are both local (as stated on the bottom of page 1 of statement) and regional in nature. About 65 percent of the estimated benefits for flood control is attributed to prevention of damages in the local Rexburg-Sugar City area. Another 12 percent of the benefits results from reduction of flood flows on Snake River through southern Idaho, and the remaining 23 percent results from reduced flooding in the lower Columbia flood plain areas. The Teton project is an increment which will reduce spring flood flows throughout the downstream Snake-Columbia Basin. It will be part of a system operation and can help in the solution to the problem of nitrogen supersaturation at the lower Snake and Columbia River projects. The dam will prevent the majority of local Teton River spring floods and reduce local downstream ice jam floods. The potential for flood damage will still exist from rainfall flooding in the Rexburg area, especially during the winter with frozen ground. Flood control as a project purpose is a joint-use function with all reservoir storage space also used for irrigation. With the dam moderating the high spring flows, downstream channels will tend to lose hydraulic capacity as vegetation encroaches somewhat in the absence of periodic natural cleanout.

The statement does not indicate how the project would be operated or include filling and drawdown schedules. We assume that the project will be filled on a hydrologic forecast basis as an added increment in the total Snake-Columbia system. Operational procedures should be detailed in the statement because the filling and drawdown will have an impact on aesthetic considerations, recreational use, and flood control efficiency.

In the section "Background Information," a brief description of the effect of the supplemental irrigation water on agricultural activities would provide a more complete description of the project. Increases in use of farm chemicals would result in higher levels of pollutants or nutrients in the irrigation return water. Any return flow discharge to the Teton River or any other tributary to the Teton River is subject to the Corps of Engineers' jurisdiction under Section 13 of the Rivers and Harbors Act of 1899, and regulations promulgated thereunder. The environmental statement should explain what actions will be taken to be responsive to this Act.

Nitrogen supersaturation is not always dependent upon spillway operation, as the first paragraph on page 5 of the environmental statement implies. Our investigations of surplus flows from existing projects having outlet works for release have also indicated nitrogen supersaturation. If surplus flow is released through auxiliary outlet works where a conventional stilling basin is used, an increase in nitrogen supersaturation can be expected. The severity of the problem that might occur at the Teton project cannot be evaluated from the information included in the draft statement.

The information on dissolved oxygen and water temperature conditions in the reservoir, as discussed on page 5, paragraph 1, would indicate that a selective withdrawal intake may be necessary to maintain downstream water quality. Future studies discussed in paragraph 2 on page 5 of the environmental statement should consider this possibility.

On page 6, it is stated that transmission facilities will be constructed by other agencies. We assume that the environmental impacts of such facilities will be covered by comments from agencies responsible, or by the Bureau of Reclamation in the final statement.

On page 10, paragraph 4, a minimum flow release of 150 cfs is discussed. However, the discussion of river conditions before project construction does not quantify river flows to permit the reader to determine what impact the project will have on natural river flows. Any loss of water through irrigation has an effect on downstream surface water flows and removes the option to use the water elsewhere. In connection with this, any anticipated effect on local groundwater levels or high water table drainage should be noted. Also, recent low summer flows have been known to result in poor water quality conditions below Milner Dam, and there has been some study regarding exchange of irrigation water through the southern Idaho distribution system to relieve this problem. The Corps' Ririe Dam project is somewhat involved (along with the Bureau's Swan Falls project) in these studies. The relationship of the Teton project to such local and regional aspects should be explained.

NPDPL-FW 30 April 1971
Mr. H. T. Nelson

Considering the number of fish, wildlife, and aesthetic environmental aspects being unavoidably eliminated by the proposed project, a section on "Adverse Environmental Effects Which Cannot Be Avoided" should be included, as required by the National Environmental Policy Act of 1969.

We assume that the section on "Alternatives" will be expanded and extensively developed to present an analysis of alternative means of providing equivalent power, irrigation, and flood control benefits to the region. For example, a riprap levee which now protects part of Rexburg was constructed during an emergency situation, and a permanent levee with channel work was recently completed in the region at Lyman Creek. Studies conducted by the Corps of Engineers in 1955 described other streambank protective works in the local area. Levees as conceived during the 1955 studies were not economically justified at that time, but, nevertheless, the concept remains as an environmental alternative to prevent local flood damages. Environmental alternatives to other project functions should also be described.

We appreciate the opportunity to review and comment on the draft environmental statements prepared by your agency.

Sincerely yours,

A. R. MARSHALL
Colonel, Corps of Engineers
Acting Division Engineer

U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Survey
601 E. 12th Street, Room 1436
Kansas City, Missouri 64106

April 8, 1971

Mr. H. T. Nelson
Regional Director
Bureau of Reclamation
Regional Office, Region 1
Box 8008
Boise, Idaho 83707

Your Ref: 320

Dear Mr. Nelson:

Thank you for sending a copy of an "environmental statement for the Lower Teton Division of the Teton Basin Project, Idaho.

The National Ocean Survey (formerly Coast and Geodetic Survey) has established and is maintaining the national network of control survey stations throughout the 50 states and prossessions. The Kansas City office is charged with the responsibility of furnishing operational direction and certain administrative and logistics support for the field parties carrying out this program.

While this office has no responsibilities for work affecting the environment, we are interested in the adequacy of our survey network to provide the control your projects require. We are also concerned that construction or cultural change due to your projects may make it necessary to relocate our survey monuments to beyond the affected area.

As you develop plans for construction or become aware of cultural change, we will be glad to discuss any requirements for additional control you may have and to discuss means by which any endangered stations may be relocated to a safe position.

Sincerely,

G. L. Short
CAPT, NOAA
Mid-Continent Field Director
National Ocean Survey

U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Survey
Pacific Marine Center
1801 Fairview Avnue East
Seattle, Washington 98102

12 April 1971

In Reply Refer to:
CFS2x2/690

Regional Director, Region 1
Bureau of Reclamation
Box 8008
Boise, Idaho 83707

Dear Sir:

The Coast and Geodetic Survey was one of the agencies involved in the creation of the National Oceanic and Atmospheric Administration in October 1970. The former Coast and Geodetic Survey was combined with the U. S. Lake Survey to form the National Ocean Survey within the new NOAA organization.

Within NOAA, all comments on environmental statements will be provided by the Office of Ecology and Environmental Conservation, National Oceanic and Atmospheric Administration, Rockville, Maryland 20852. Please revise your mailing lists accordingly.

I am forwarding your statement for the Lower Teton Division of the Teton Basin Project to the Rockville office for comment. They will reply to you directly.

Sincerely,

Norman E. Taylor
RADM, NOAA
Director, Pacific Marine Center

cc: Office of Ecology and Environmental Conservation, NOAA

LOWER TETON

U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
Rockville, Md. 20852
National Ocean Survey

Date: April 26, 1971

Reply to Attn of: C1211

BUREAU O...
OFFICIAL FILE ...
Rec'd

Subject: Comments on the Bureau of Reclamation's Environmental Impact ... on the Lower Division of the Teton Basin Project, Idaho

To: Regional Director
Bureau of Reclamation
P.O. Box 808
Boise, Idaho 83707

Horizontal geodetic control has been established in the vicinity of the project area, with one existing monument located about two miles south of the dam site.

Vertical geodetic control has been established along U.S. Highway 20 from Newdale to Tetonia, Idaho, and along Union Pacific Railroad in the vicinity of the project area.

It is possible that triangulation station DALE will require relocation during the construction of the canals. This station monument is also a bench mark. If relocation is required, it is requested that the Bureau of Reclamation provide the necessary funds and include it in their project cost report.

The Geodesy Division does not have any comments in regard to the environmental impact of the proposed project.

J. O. Phillips
Captain, NOAA
Associate Director of
Geodesy and Photogrammetry

ENVIRONMENTAL PROTECTION AGENCY
WATER QUALITY OFFICE REGION X
501 PITTOCK BLOCK
PORTLAND, OREGON 97205

May 4, 1971

Mr. H. T. Nelson
Regional Director
Bureau of Reclamation
U. S. Department of the Interior
Regional Office, Region 1
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

We have reviewed the Environmental Statement for the First Phase, Lower Teton Division, and have the following comments.

Completion of studies now underway by your office is necessary before we could comment on the impacts of the proposed project on water quality. Also, the statement does not present any information regarding the impact of irrigation return flows on water quality. The location, quantity, and quality of such flows should be described and discussed.

The justification statement that indicates this project will produce electrical energy without pollution is incorrect. This project will flood 17 miles of prime wildlife and fish production area, remove an additional 6,000 feet of natural streambed, and will provide irrigation waters which will be of reduced quality when they return (whether or not they are within State standards).

Also, the project will create additional electrical demands (diversion pumping plants, irrigation pumps, increased farm usage, processing plants, etc.). The impact statement should show the pollution potential that full development will create. Actually, a hydro-project such as the Teton is probably the most serious form of pollution, that of irreversibly altering the natural features of the landscape with the works of man.

The total impact of this project would far exceed the area inundated by the reservoir. The various ecosystems which extend over a broad area are either directly or indirectly dependent on the canyon area for survival.

The statement refers to low-profile switchyards, buried pipelines and transmission lines as justifications. Certainly, if the project is constructed, the Bureau of Reclamation has a moral and legal responsibility to reduce to a minimum the adverse environmental impacts. However, such mitigative features cannot offset the loss of natural features. We also believe that the moral and legal responsibility to minimize adverse impact extends to the proposed borrow area below the project. The statement makes repeated reference to the economic need to use the downstream area because of decreased construction costs, more desirable scheduling, and an increased power head. If the Teton Project is really justified then that justification must include all the costs and these costs include irreversible damage to the streambed. We feel the National Environmental Policy Act is a clear indication that decisions regarding development must include environmental costs. If we cannot afford to minimize the ecological damages, then how can we afford the project if we are in fact trustees to future generations.

Along the same line, we feel that the statement should, under alternatives, deal with the large questions of project purpose. Specifically, there is an implicit assumption that irrigation must be developed. Actually, the real point which should be addressed is whether or not increased food and fiber projections could be met in ways or areas less damaging to the environment. Since the food and fiber projections are national and regional in nature, then the consideration of projects to meet these needs should also be broad based. Is it really in the national interest to develop these lands considering all real costs of providing water including the environmental costs? If the cost of providing irrigation water is to be offset from power revenues at other projects, the statement should so state.

We are aware that these comments deal with basic questions regarding the authorized project; however, we feel it is these types of issues that the NEPA statements were envisioned to bring out.

We also feel that this statement should include second phase development as required by the guidelines regarding initial actions which commit the Federal government to courses of action.

Thank you for the opportunity to comment. We would appreciate your informing us if agency comments are to be incorporated in a revised draft or attached to this draft.

Sincerely yours,

Hurlon C. Ray

Hurlon C. Ray, Director
State and Federal Assistance
Programs

FEDERAL POWER COMMISSION
REGIONAL OFFICE
555 BATTERY STREET, ROOM 415
SAN FRANCISCO, CALIF. 94111

73A-East Basin

April 26, 1971

H. T. Nelson
Regional Director
Bureau of Reclamation
P. O. Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

This is in reply to your letter of April 2, 1971, requesting comments of the Federal Power Commission on the environmental impact of the First Phase of the Lower Teton Division of the Teton Basin Project.

Pursuant to the National Environmental Policy Act of 1969, and the role of expertise assigned to the Federal Power Commission as designated in the memorandum of July 29, 1970, of the Council of Environmental Quality, the comments herewith are directed to the relationship of the electrical capacity of these units, to the prospective power supply and demand situation of the systems and region involved, to the fuel supply situation related to the type of plant and its environmental effects; and to comment on alternative means of meeting the power supply needs for which these units are proposed. It is understood that other agencies will review and comment on specific aspects relating to effects of the units on air and water quality, and other environmental factors.

(1) Need for Power in the Area

There are three utilities serving loads in the vicinity of the proposed project. The City of Idaho Falls Electric Division's system serves the city of that name which is approximately 35 miles southwest of the proposed site. The Rexburg Division of Utah Power and Light Company serves the other communities in the area. Fall River Rural Electric Cooperative, Inc., serves the rural area to the northwest of the project.

The City of Idaho Falls has three small hydroelectric generating plants with total capacity of 7,400 kW and one 2,500 kW diesel-engine generating plant. The city is a preference customer of the Bonneville Power Administration (BPA) and a major portion of its requirements were supplied by BPA's Boise-Minidoka-Palisades project system. In 1969, BPA supplied 162 GWh (75%) of the system's 216 GWh total energy requirements. The Palisades

project is located about 60 miles southeast of Idaho Falls and about 50 airline miles from the proposed Teton Basin Project. The peak demand on the city's system rose from 35.5 MW in 1965 to 46.6 MW in 1970. A system peak demand of 63.0 MW is estimated for 1974.

Utah Power and Light Company has two small hydroelectric plants totaling 6,300 kW in the area. The peak demand of the company's Rexburg Division was 172 MW in 1969. Between 1965 and 1969, the Division's peak demand increased by 35 MW, or at an annual average rate of over 5.8 percent. During the same time period, the Utah Power and Light Company's total system load growth was at an average annual rate of over 7.8 percent. Load forecasts by the company indicated that further growth is expected. A system peak demand of 2,158 MW is expected by 1980 in comparison with the actual 1,255 MW peak the system experienced in 1970. This amounts to an average annual rate of increase of about 5.6 percent. The Rexburg Division will no doubt participate in the expected load growth of the total system.

Fall River Electric Cooperative, Inc., is also a preference customer of BPA. System peak demand increased from 7,964 kW in 1965 to 11,744 kW in 1969, or at an average annual increase of over 10 percent.

Utah Power and Light Company and BPA are members of the Northwest Power Pool. Utah is presently engaged in adding to its generating capacity by constructing two large fossil-fueled units. The West Group of the Northwest Pool has a Hydro-Thermal Program in which a number of nuclear-fired generating plants and additional hydroelectric units are scheduled to be placed in service over a 10-year period.

There appears to be little doubt that additional capacity will be required to serve electric loads in the vicinity by the time the proposed project can be built.

(2) A Possible Alternative Power Source

A possible alternative power source in future years is increased supply from the Utah Power and Light Company's generation in Utah or Wyoming. Utah now has under construction a third unit, Naughton No. 3, at Kemmerer, Wyoming. This will be a coal-fired unit of 330,000 kW which is expected to be in service by October 1971. The company is also planning the Huntington Canyon coal-fired generating plant which is located about 110 miles southeast of Salt Lake City. The initial capacity of the plant will be 430 MW and its scheduled operation date is June 1974. Ultimate capacity of the plant may be as much as 2,000 MW.

(3) The Fuel Situation Relative to Such Alternative Power Source

It is expected that coal will be available near Utah Power and Light Company's Naughton site at Kemmerer, Wyoming in sufficient quantities to fuel the plant for at least the 30-35 year life of the plant's three units. The coal supply at the Huntington Canyon plant site is expected to be sufficient to fuel the two scheduled units over their lifetime service and also possibly several additional units. There may be coal reserves available near the site in quantity sufficient to fuel a total of 2,000 MW over a service lifetime of 30-35 years. The area's total coal reserves have not been determined.

There are no existing or proposed hydroelectric or steam-electric power plants within the area of downstream influence of the Fremont plant. The nearest downstream hydroelectric power plant is the Upper Hydro power plant on the Snake River.

These informal comments are those of the San Francisco Regional Office, and have not been approved by our Washington office. They may differ from formal comments which they may wish to make.

Sincerely yours,

M. Boyd Austin

M. Boyd Austin
Regional Engineer

FORM FHWA-121A (REV. 4-70)

UNITED STATES GOVERNMENT

Memorandum

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

DATE: April 8, 1971

TO : Mr. H. T. Nelson, Regional Director
Bureau of Reclamation
P. O. Box 8008
Boise, Idaho 83707

In reply refer to: 08-10.2

FILE

FROM : Omar L. Homme
Division Engineer
Boise, Idaho

By C. C. Hallvik
Assist. Division Engineer

SUBJECT: Teton Basin Project

I have reviewed the draft environmental statement for the Lower Teton Division of the Teton Basin Project transmitted with your letter of April 2, 1971.

The project as proposed has no immediate effect on the Federal Aid Highway Systems in the area. No doubt the development, upon completion, may well indicate need for expansion of Federal Aid transportation systems to provide access and additional transportation facilities.

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
BUREAU OF PUBLIC ROADS
REGION NINE

Wyoming Division Office
P. O. Box 1127
Cheyenne, Wyoming 82001

April 9, 1971

Mr. H. T. Nelson
Regional Director
Bureau of Reclamation
Regional Office, Region 1
P. O. Box 8008
Boise, Idaho

Dear Mr. Nelson:

We have looked at the draft environmental statement for the Teton Basin Project transmitted to us by your letter dated April 2, 1971.

It does not appear that the project will effect any proposed highway construction in Wyoming. Therefore, we have no comments on the proposed work.

Sincerely yours,

JOHN M. DEMMER
Division Engineer

IDAHO FISH AND GAME DEPARTMENT

POST OFFICE BOX 25
600 SOUTH WALNUT STREET
BOISE, IDAHO 83707

May 14, 1971

Mr. H. T. Nelson, Regional Director
Bureau of Reclamation
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

Enclosed are the Idaho Fish and Game Department comments on the draft copy of the Environmental Impact Statement for Lower Teton Division which we received with your letter of April 2, 1971.

We are forwarding our comments at this time in response to your request of May 10, 1971, that comments be submitted no later than May 17. It is our understanding that Department of Interior guidelines provide for a 60-day review period on environmental statements where outside agencies are involved.

Any changes or additions to the enclosed comments which we may wish to make will be submitted within the normal prescribed review period.

Sincerely,

IDAHO FISH AND GAME DEPARTMENT

Robert L. Salter
Acting Director

IDAHO FISH AND GAME DEPARTMENT

JOHN R. WOODWORTH, Director

POST OFFICE BOX 25
600 SOUTH WALNUT STREET
BOISE, IDAHO 83707

May 14, 1971

Mr. H. T. Nelson, Regional Director
Bureau of Reclamation
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

We have reviewed the draft copy of the environmental statement (PL 91-190) for the Lower Teton Division of the Teton Basin Project, Idaho which was received in our office April 5, 1971.

It is our considered opinion that the statement meets neither the intent of PL 91-190 nor the specific requirements under Section 201-C of the law which calls for "a detailed statement" on the following five points:

(i) the environmental impact of the proposed action,

(ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,

(iii) alternatives to the proposed action,

(iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and

(v) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

Impacts under point (i) are not clearly and fully stated. There is no specific discussion of point (ii). Point (iii) is essentially dismissed. Point (iv) consists of four sentences basically stating an opinion that project development as proposed will contribute more to the environment than other uses of the involved resources, and two sentences are devoted to point (v).

The principal intention of the document appears to be one of justifying project purposes and economics rather than fully and clearly pointing out environmental aspects. We recommend that the statement be discarded and a new one prepared that complies with the intention and requirements of the Environmental Policy Act.

Our specific comments on the statement as written are as follows:

Project authorization was based on the U. S. Bureau of Reclamation special report, "Lower Teton Division, Teton Basin Project, Idaho, 1962." According to the report, data utilized were largely of a reconnaissance nature and a subsequent report based on detailed studies then underway would be prepared prior to construction. We have not received a copy of this subsequent report and to our knowledge, one has never been made public. The lack of detailed project information makes it extremely difficult to determine the full extent of adverse environmental impacts that would result from project construction.

We cannot agree that proposed project development will necessarily result in a net enhancement of the human environment as outlined in the last paragraph on page 1. It is entirely possible that these same benefits can be obtained at other places or by other means with far less adverse effects on the natural environment.

Attempts to distinguish between the "human" environment, which is composed of many artificial elements and the "natural" environment are confusing. Enhancement of the total environment would consist of positive contributions to the "human environment" with no major accompanying destruction of the "natural environment." The Lower Teton Project does not accomplish this goal.

Page 3, second full paragraph, line 12-- Vegetation in the canyon has major value in addition to that supplied to wildlife. It contributes in large measure to the unique aesthetic values of the canyon area.

Page 4, paragraph 2--The preparation of construction specifications to minimize pollution is commendable. We have had experience with construction done under similar specifications however, and feel confident in stating that despite these precautions, major stream pollution will occur during construction activities.

Presumably somewhat similar specifications were in force during pre-construction access road work conducted in the fall of 1970. The accompanying photographs graphically illustrate the adverse results of this activity.

Page 5, paragraphs 1 through 3--Reservoir water quality and the quality of downstream water releases, are of major concern to our Department. Extremely serious adverse effects on fish life from dissolved oxygen deficiencies and temperature changes are a possibility. With the exception of nitrogen supersaturation, predictions made of water quality that will result from project construction have been to date based almost exclusively on guesswork and opinion. Methodology for making reasonably accurate systematic predictions of reservoir water quality is available. Studies based on this methodology have just recently been initiated. Adequate input data is lacking, however, and cannot be collected prior to the scheduled start of construction. It is our firm conviction that construction should not be considered until acceptable water quality studies have been completed. Without full knowledge of the problem, satisfactory structural and operational remedial measures that may be needed cannot be assured once construction has proceeded.

Page 6, last sentence--We cannot assess the value of this proposal or any possible detrimental effects without detailed location, design, soil, and moisture information on the proposed canals.

Page 7 and 8, Borrow Areas--Utilization of over a mile of stream channel and canyon floor below the damsite as a borrow area will have extremely serious adverse effects on fish and wildlife. We will elaborate on these effects at a later point in our comments.

The next to last sentence in the first paragraph on page 8 refers to suggestions and preliminary plans received from the Bureau of Sport Fisheries and Wildlife for channel rehabilitation. Suggestions and preliminary plans cannot be considered endorsement of a rehabilitation plan which is not in existence. To the best of our knowledge, the Bureau of Sport Fisheries and Wildlife position disapproving the downstream borrow area was arrived at after full consideration of the effectiveness of all rehabilitation proposals made to date. Based on available data, our own analysis of the situation is that it will not be possible to restore a pool-riffle relationship or any other relationship resembling existing conditions.

In the last sentence of the first paragraph on page 8, the statement is made (referring to channel rehabilitation) that "Similar programs have been very successful in areas below Flaming Gorge and Blue Mesa dams in Wyoming and Colorado respectively." Flaming Gorge Dam is in Utah not Wyoming. We have contacted the Utah and Colorado Fish and Game Departments and the Bureau of Sport Fisheries and Wildlife in Salt Lake City and have found no knowledge of any channel rehabilitation work done below these dams much less an evaluation of success. It is our understanding that

in the case of Blue Mesa Dam, the stream below the dam will be innundated by Morrow Point Reservoir.

The second paragraph on page 8 refers to shaping of borrow areas to facilitate restoration of native vegetation. As will be pointed out later in our comments, the existing complex of varied vegetative types is vital to big game needs. We are aware of no examples which demonstrate the success of restoring such a varied vegetative complex. Based on information available to us and our own experiences in attempting to restore comparatively simple, wild mono-cultures, we must conclude that replacement of all the necessary vegetative types in the downstream canyon borrow areas is not feasible.

Pages 9 and 10, Effects on Fish and Wildlife--The first six paragraphs under this heading are taken from the Bureau of Sport Fisheries and Wildlife Reconnaissance Report and we concur in their content. It should be pointed out that this report was strictly a reconnaissance report and was based on reconnaissance level information in the U. S. Bureau of Reclamation special report of 1962. Authorization took place before a detailed fish and wildlife project report could be prepared and our Department consequently has never officially commented on a final detailed fish and wildlife plan for the project.

Teton Reservoir will completely eliminate 17 miles of extremely high quality trout stream fishery.

Another one mile plus of stream below the dam will be seriously impaired or essentially eliminated by construction requirements under the proposed plan. According to our analysis, present construction plans (including any channel rehabilitation attempts) will result in this stream section being reduced to conditions very similar to the existing Linderman Dam reservoir pool upstream from the project area--a pool noted for very poor fish production.

An additional 12 miles of popular and productive fishing stream below the project will be impaired by reduced quantity of water flows from the project and possibly by the quality of reservoir water releases. A minimum sustained downstream flow of 300 cfs has been recommended by the concerned fishery agencies. According to the 1962 U. S. Bureau of Reclamation report, project winter flows will be only 150 cfs one third of the time and in October, November and December flows will be reduced to 150 cfs in 25 out of 30 years. Based on our present knowledge, reduced flows of this magnitude, frequency and duration are unacceptable from a fishery standpoint. We have seen no analysis of either first or second phase project effects on stream flows beyond the immediate project area as related to fish and wildlife needs. Such an

analysis is imperative if the full impact on stream habitat is to be determined. We have also seen no information on diurnal, weekly, or monthly flow fluctuations that may result from power operations.

Contribution of the future reservoir fishery and proposed fishery mitigation measures cannot be estimated without more detailed information on potential water quality, flow fluctuations, and systemwide effects of reduced flows. Present information and past experiences are not encouraging. Under no circumstances can the valuable stream fishery in the reservoir pool area be replaced and this will be a major irreversible loss.

Studies and surveys in Idaho have shown a definite preference of fishermen for stream fishing and a much greater comparative use of streams than of reservoirs. According to a survey conducted by the University of Idaho, the proportion of resident and nonresident fishermen in Idaho who expressed a preference for reservoir and lowland lake fishing was approximately 25 percent, while 60 percent preferred stream fishing.

Teton Reservoir will eliminate all species of resident wildlife dependent upon river bottom habitat. In addition to those species mentioned in the statement, song birds, certain birds of prey, and rodents will be involved. As was pointed out in the statement, the river reach in the project area is the only open water in Teton Basin during the winter. It was not made clear, however, that after impoundment the reservoir will freeze and eliminate the existing heavy winter waterfowl use.

The reservoir will irreversibly remove 17 miles and approximately 2,700 acres of summer and winter range utilized by big game animals. This range is vital as emergency habitat to sustain these animals during hard winters. Without it, major reductions in herd size are inevitable and complete elimination of big game herds is conceivable if adverse weather conditions should occur over a series of years.

Proposed mitigation measures will not compensate for innundated habitat. Enhancement of range by browse planting is extremely difficult. Some success is possible on ranges where the original browse has been removed by poor land management practices. In the area under question, original browse is still present. Materially increasing the amount of browse by plantings is most unlikely under these circumstances. Even if some measure of success could be obtained using presently untried methods, it would be many years before plants would attain sufficient size to be available as food to animals in the deep snow conditions that commonly occur. Mature trees providing cover would require an even longer period of years to reach sizes that would afford protection against the elements.

Land acquisition for wildlife would be of considerable value in preventing any future developments or activities which would still further reduce the value of remaining range after impoundment. It would not, however, compensate for losses due to project construction. We have had experience with similar acquisition proposals at other projects and it has been most difficult if not impossible to secure necessary acres if private lands are involved.

Elimination of habitat in the pool area greatly increases value of the three remaining miles of canyon below the damsite as emergency big game range. Removal of over a mile of the more valuable upstream portion of this remaining range by borrow activities is most serious and can only accelerate big game losses.

Big game animals are almost totally dependent upon the canyon and its vegetation during hard winters. The surrounding area is dry farmland with practically no winter food or cover and subject to deep snow cover, very low temperatures, and high winds. Existing canyon vegetation is a mixture of mature trees and understory species which provide both food and shelter from extreme winter conditions for big game animals. As previously stated, we do not consider replacement of this vegetative complex, whose variety is essential to the animals' survival, to be possible.

Pages 10 and 11, Recreation--The statement does not consider the fact that Teton River, as it now exists in the project area, is a unique and valuable recreation resource with potential for national significance. The type of float trip with abundant associated fish, wildlife and aesthetic resources that can now be enjoyed is one of the fastest growing outdoor recreation activities in the West. Waters that can supply this type of experience are in short supply and great demand.

On the other hand, there is no shortage of flat water recreation opportunities in the Upper Snake River drainage. Out of a total 294,700 acres of water in the drainage above Milner Dam, 266,700 acres are composed of reservoir water. Studies by the Bureau of Outdoor Recreation have shown that existing flat water is more than adequate to meet this type recreation need through the year 2020. Recreation facility developments as proposed for the Teton project can be more efficiently and economically provided on these existing underutilized reservoirs. Need would be satisfied without eliminating another valuable recreational resource such as the Teton River.

There is no discussion in the statement of reservoir water levels during the major summer recreation season. It is our understanding

that the reservoir will be drawn down during this period with the usual accompanying aesthetic degradation of devegetated banks and exposed silt accumulations.

Photographs of the Teton River canyon under present conditions within the project area are attached.

Page 11, Alternatives to Proposed Action--We are unable to comprehend the statements that "There are no known alternative means of utilizing the water and related land resources which would provide equivalent overall economic, social, and environmental benefits at comparable costs" and "Leaving the water and related land resources in their present state would forego extensive recreational and economic benefits."

There is at least some question as to comparative long-term economic benefits. Based on present facts, there is no question in our mind that greater social and recreation values could be obtained at no cost by simply not constructing the project.

Possible alternatives to proposed action which would eliminate or reduce adverse environmental impacts are available. The most promising one would be some combination of retention and development of the Teton River as a recreation river, further development, including recharge, of ground water sources to serve full time both supplemental and new lands irrigation needs, and levee, flood plain, flood proofing, and flood damage insurance programs for flood control. This course of action could preserve existing fish and wildlife values, increase recreational values and fill all other needs except hydroelectric power generation which is actually insignificant at this site in relation to total power needs. Even if total irrigation and flood control economic benefits were somewhat reduced over those now calculated, the total net benefits would be greater by virtue of preserving the existing environmental values. Variations on this alternative could be numerous, including such plans as a smaller reservoir located further upstream in the canyon with greater ground water use and water saving measures to make up the difference in available irrigation water.

In view of the major unresolved conflicts which revolve around a unique and valuable recreation resource with potential for national significance, we believe this project comes under the purvue of Section 201-D of the Environmental Policy Act. The requirements of this section should be fully met before the start of construction is considered.

Pages 11 and 12, Relationship of Short-Term versus Long-Term Needs--With the exception of the first sentence, we cannot agree with the statements

made under this heading. It should be pointed out that alteration of the present aesthetics of Teton Canyon will result in serious degredation of those aesthetics through a widely fluctuating reservoir. Major adverse effects on fish and wildlife are a certainty not a possibility.

In light of the major conflicts involved, needs for irrigation water, flood control, and hydroelectric power, as they are to be met by this project proposal are open to question and further study. Supplying supplemental irrigation water with 22 percent repayment from a source that will be fully effective only one-half of the project years to lands, some of which apparently already receive from 10 to over 15 acre-feet per acre, is at least questionable both from a need standpoint and from the standpoint of meeting State of Idaho requirements for beneficial use of water. There is also some question when dealing with floods of the type that occur along the lower Teton River as to what portion of the flood waters originate below the proposed dam. The Teton River gauging station is six miles below the damsite. Ice jams and local sheet runoff which are typical in the area between the dam and the gauging station and between the gauging station and downstream reaches could conceivably contribute significantly to recorded flood flows and actual flooded property.

Power production at the proposed site is inconsequential in relation to total power needs. The most recent Federal Power Commission estimate for Pacific Northwest Area firm electric loads by the year 2020 is 200,800 megawatts. According to information in the Bureau of Reclamation, 1962, Special Report firm power generated at Lower Teton Dam would be approximately 0.001 percent of this amount.

For reasons previously set forth in these comments, we obviously disagree with the statement that project development as proposed will necessarily contribute more to the overall improvement of man's environment than will continuation of present uses.

We do not understand the statement that, "Water and land resources are not lost nor is further development for other purposes having higher values precluded by this development." We find just the opposite to be true. Impoundment of Teton River will irreversibly remove a valuable fish, wildlife, and recreation land and water resource. Nondevelopment or alternative development that would preserve the river would still leave the option for initiating the present proposal sometime in the future if other needs ever became actually vital and alternate means of filling them were not possible.

Page 12, Irreversible Committment of Resources--Degradation of canyon aesthetics, loss of a needed and valuable stream recreation resource and losses to the fish and wildlife resource as described earlier in our comments are all irreversible certainties. It should be pointed out that while commitment of the water itself for irrigation and power is not irreversible--the above described losses that will result from the method used to achieve this commitment are irreversible.

- - - - - - - - - - - - -

We appreciate the opportunity to comment on your Environmental Impact Statement for the Lower Teton Division. In summary, we strongly recommend that the start of construction on this project be delayed until the unresolved questions concerning fish and wildlife receive adequate consideration, requirements of the National Environmental Policy Act are fully complied with, and a detailed project report is made public which would provide sufficient information to make possible full assessment of environmental impacts.

In order to best meet these requirements, we recommend project re-evaluation taking into full account environmental impacts, possible alternative courses of action, and all other factors which would affect project evaluation under today's conditions. First phase and second phase development should be studied under one plan prior to the start of construction. As the project now stands, over 50 percent of total benefits are theoretically provided by the second phase upon which a project study has not been completed. Consideration of both phases under one plan would make possible a far more realistic assessment of economic benefits and related environmental impacts.

A unique and extremely valuable fish, wildlife and recreation resource with potential for national significance will be lost through the proposed project construction. This resource cannot be replaced.

We believe it would be in the best interests of all immediately concerned and to the people of Idaho and the Nation as a whole to have clear assurance that under today's conditions and values and in full consideration of all factors involved any proposed project is making the best possible use of available land and water resources.

Sincerely,

IDAHO FISH AND GAME DEPARTMENT

Original Signed
by Robert L. Salter

Robert L. Salter
Acting Director

IDAHO FISH AND GAME DEPARTMENT

JOHN R. WOODWORTH, Director

POST OFFICE BOX 25
600 SOUTH WALNUT STREET
BOISE, IDAHO 83707

May 20, 1971

Mr. H. T. Nelson, Regional Director
Bureau of Reclamation
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

We have discovered a typographical error in our comments on the Lower Teton Project Environmental Impact Statement which was transmitted to you on May 14, 1971. The figure in the last line in the second full paragraph on page 8 should be 0.001 instead of 0.0001.

A corrected copy of the comments is enclosed.

Sincerely,

IDAHO FISH AND GAME DEPARTMENT

Robert L. Salter
Acting Director

Enclosure

Idaho **DEPT. OF PARKS**

Statehouse, Boise, Idaho 83707

April 8, 1971

Mr. H. T. Nelson, Regional Director
Regional Office, Region I
Box 8008
Bureau of Reclamation
Boise, Idaho 83007

Dear Mr. Nelson:

Reference is made to the draft copy of the environmental statement for the Lower Teton Division of the Teton Basin Project, Idaho.

The following comments are based on our review of the statement:

1. Page 3 of our copy of the statement was missing. Presumably this page covered the excavation which is also covered under Borrow on Page 7. From all indications the environment and water quality will be protected to the fullest extent possible for this type of project.

2. On Page 11 under Recreation, the first full paragraph should be revised as follows: Development of the initial recreation facilities will be a cooperative venture financed jointly by the Bureau of Reclamation and the Idaho Department of Parks as funds are approved by the State legislature and future expansion of recreational facilities will be the responsibility of the Idaho Department of Parks and will be furnished as the need arises and funds are made available.

Sincerely,

Wilhelm M. Beckert
Director

rk

STATE OF IDAHO
IDAHO WATER RESOURCE BOARD
STATEHOUSE
BOISE, IDAHO 83707

DR. ROBERT R. LEE, Director

April 30, 1971

Mr. H. T. Nelson, Regional Director
Region 1, Bureau of Reclamation
P. O. Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

We have reviewed the environmental statement on the First Phase of Lower Teton Division, Teton Basin Project, Idaho, and have the following comments:

1. We believe it would be helpful to include a complete listing of all Federal, State and local agencies which, based on their jurisdiction by law or special expertise, have been furnished a copy of the environmental statement together with their summary comments.

2. There should be more discussion of the possible cumulative environmental impacts that Phase II will have.

3. The report should discuss the impact that the proposed downstream borrow pit activities will have on the river ecosystem. It appears that they will be substantial.

4. The report mentions a gain in power benefits which can be realized from increasing power head by 17 feet of river bed excavation. The report should show the additional annual power benefits to be gained by this channel alteration and compare them with the negative impacts to the river environment.

5. The environmental statement should discuss the effects that the damming of the river and the creation of a quiescent deep body of water may have on the present excellent fishery.

6. The report states that dissolved oxygen depression in the reservoir may occur and that it is not anticipated that unfavorable fishery conditions due to D.O. problems will occur downstream. Conditions for fishery within the pool area due to possible oxygen depletion should also be discussed.

7. It is mentioned in the statement that organic material will be trapped in the reservoir. Discussion of the potential for algae problems due to such nutrients being available should be included.

8. The report should mention the effects that the construction of buried pipeline (The Fremont Pump Canal) along the river bank may have on the canyon environment, and what length of the river bank would have to be disturbed to lay the pipe.

9. A discussion of potential effects of irrigation return flows on the river or groundwater quality should be included.

10. No mention is made of any anticipated power peaking at the project power plant. If power peaking is to be practiced, a discussion on downstream river fluctuation and its effects on downstream environment and uses should be included.

11. Alternatives to proposed action should include some indication of cost and benefit values associated with the various alternatives.

12. The section on irreversible commitment of resources should mention that 17 miles of free flowing river will be converted into a lake. Also, the extent of the loss of summer and winter range utilized by big game should be included. The proposed downstream channel excavation would likely constitute an irreversible loss of valuable river section.

Sincerely yours,

Robert R. Lee

ROBERT R. LEE
Director

RRL:dw

cc: Governor Andrus
Board Members

STATE OF IDAHO
DEPARTMENT OF WATER ADMINISTRATION

WATER DISTRICT NO. 01

P. O. Box 697
Idaho Falls, Idaho 83401
522-5404

ARTHUR L. LARSON
Watermaster

April 29, 1971

Mr. Harold T. Nelson
Regional Director, Region 1
U.S. Bureau of Reclamation
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

Re draft copy of the environmental statement by the Bureau of Reclamation regarding the Lower Teton Division of the Teton Basin Project, Idaho.

I have reviewed the statement, and offer the following comments, concurred in by the Committee of Nine.

The waterusers of Water District 01, at their annual meeting in Idaho Falls on March 6, 1961, unanimously endorsed a resolution favoring construction of the Lower Teton Project, and reaffirmed their approval at succeeding annual meetings. The drought year of 1961, and the damaging flood of 1962, accentuated the need for this project.

The original resolution made special note that the project be built not only for irrigation and flood control, but also to conserve and develop fish and wildlife resources and provide recreational benefits. It appears that every consideration is being given to utilizing the water and related land resources of the area involved for the most overall economic, social and environmental good.

The Committee of Nine (advisory body of Water District 01) wholeheartedly supports maintaining the scheduled construction on the Teton Project leading to completion of the first phase in fiscal year 1976.

Very truly yours,

Arthur L. Larson

Arthur L. Larson

cc: Members of Committee of Nine
Director, Idaho Dept. of Water Administration
District Chief, U.S. Geological Survey

LOWER TETON

STATE OF IDAHO
DEPARTMENT OF WATER ADMINISTRATION
Statehouse – Annex 2
Boise, Idaho 83707
(208) 384-2215

April 8, 1971

R. Keith Higginson
Director

Water Rights Administration
Water Resource Investigations
Dam and Reservoir Safety
Water Well Drilling
Flood Plain Management
Irrigation and
Flood Control Districts

Mr. Harold T. Nelson
Regional Director
U. S. Bureau of Reclamation
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

This office has reviewed the draft copy of an environmental statement of the Lower Teton Division of the Teton Basin Project, Idaho, and has no comment at the present time.

I would like to again bring to your attention that the water right permit issued by this office for storage in Teton Reservoir provides only for the irrigation of 39,000 acres of new land and 30,000 acres of supplemental irrigation. This would compare to the 111,000 acres of land to be provided with supplemental water as set forth in the statement.

We would also draw your attention to the limitations and conditions of approval for Permit No. 22-7022, affecting the supply of supplemental water from wells to certain lands within the Fremont-Madison Irrigation District. Provisions should be made to insure that those conditions can be met by providing the necessary studies and investigations.

If you have any questions, please feel free to contact us.

Very truly yours,

C. STEPHEN ALLRED
Deputy Director

CSA:kh

GOVERNOR

STATE OF IDAHO

STATE PLANNING AND COMMUNITY AFFAIRS AGEN
BOISE, IDAHO 83707

April 26, 1971

W. A. McGregor, Area Engineer
Bureau of Reclamation
Snake River Development Office
4620 Overland Street
Boise, Idaho 83705

Dear Mr. McGregor:

This letter refers to your draft copy of the Environmental Statement for the Lower Teton Division of the Teton Basin Project, Idaho.

The State Planning and Community Affairs Agency has no comments at the present time. Each of the affected individual State agencies will submit their comments directly to your office.

Sincerely,

Glenn W. Nichols
State Planning Director

GWN:kw

May 26, 1971

Mr. Harold Nelson
Regional Director
Bureau of Reclamation
Boise, Idaho

Dear Mr. Nelson:

The Fremont County Commissioners have been presented a copy of your environmental inspection statement dated April, 1971, concerning the Teton Dam located near Teton City, Idaho.

The Fremont County Commissioners have been involved in flood control for many years near the point where the Teton River leaves the canyon near Teton City. As recently as last Spring, we were called upon to abate flooding of a garbage dump in this area. By the time we were called the garbage dump had started contamination of the River.

We have examined the project from the detriment to the environment and that of the good it will do the people of this State and Nation. It is our opinion that the benefits far out weigh any liabilities. The Teton Dam project should receive immediate attention and its construction commence as soon as possible.

Sincerely,

Edward T Kirkham

Edward ~~W.~~ Kirkham
Chairman
Fremont County Commissioners
Tetton, Idaho 83420

S. E. "EDDIE" PEDERSEN
MAYOR

OFFICE OF THE MAYOR
CITY HALL
IDAHO FALLS, IDAHO 83401

April 29, 1971

Mr. Harold Nelson, Regional Director
United States Department of the Interior
Bureau of Reclamation
Regional Office, Region 1
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

I have studied Environmental Statement, Lower Teton Division, Teton Basin Project, Idaho-Wyoming and have found it extremely informative and comprehensive.

I want to personally send to you this my firm endorsement and request from all of the people in this community I have contacted to pursue this to its final conclusion at the earliest date. The benefits have been fairly appraised and the need is so apparent that we want to offer any support which you might deem effective in securing financing for this project.

Sincerely,

S. Eddie Pedersen

S. Eddie Pedersen
Mayor
City of Idaho Falls

7

VILLAGE OF NEWDALE

NEWDALE, IDAHO 83436

CLERK

Harold T. Nelson
Regional Director
Bureau of Reclamation

Dear Mr. Nelson:

The people of the City of Newdale know that, about eight out of every ten years, Canyon Creek irrigation water runs low soon after July 15th. This is when it is needed the most for our gardens and lawns. Being at the end of the canal, we feel those farmers above us take more than their share of the water. This may or may not be true. The construction of the Lower Teton Dam would alleviate this situation and supplement our water supply greatly.

Living all our lives, as most of us have, near the Teton River, we know that fishing and hunting is not that good in this stretch of the river. It will not be damaged as much as some people would have you believe.

We, therefore, fully endorse and urge the construction of the Lower Teton Dam as soon as possible.

Yours truly,

Jay M. Robinson

Jay M. Robinson
Mayor of Newdale

RESOLUTION

WHEREAS, the Congress of the United States has passed legislation authorizing the construction of a dam on the Lower Teton River; and

WHEREAS, the construction of the Lower Teton Dam would be beneficial to the citizens of this community and the surrounding area;

NOW, THEREFORE, BE IT RESOLVED that the Mayor and City Council of the City of Rexburg endorse and support the early funding and construction of the Lower Teton Dam.

CERTIFICATE

STATE OF IDAHO,)
(SS
County of Madison.)

I, BEULAH JOHNSON, City Clerk of the City of Rexburg, Idaho, do hereby certify that the above is a true and correct copy of a Resolution passed by the City Council of the City of Rexburg, Idaho, at its regular meeting held on May 19, 1971.

Beulah Johnson

Beulah Johnson, City Clerk.

CITY OF ST. ANTHONY
110 WEST MAIN - P.O. BOX 530
FREMONT COUNTY
ST. ANTHONY, IDAHO, 83445
83445

May 21, 1971

Mr. Harold T. Nelson
Regional Director
Bureau of Reclamation
Boise, Idaho

Dear Sir:

As Mayor of the City of St. Anthony, I strongly endorse the early construction of the Teton Dam.

The additional irrigation water, flood control in the Teton and Henry's Fork valley's, and the additional recreational benefits will be very valuable to this area.

Our economy will be helped. We would benefit financially from the added recreation provided by the dam when finished and by the additional personnel needed for construction and maintenance.

Sincerely hoping this project will go forward without further delay, I am

Yours truly,

M. J. Rose
Mayor

MJR/at

CITY OF SUGAR
SUGAR, IDAHO 83448

May 22, 1971

Harold T. Nelson
Regional Director of
the Bureau of Reclamation
Boise, Idaho

Dear Sir:

We have read your environmental impact statement dated April, 1971, in regards to the Teton Dam project. After careful consideration of the facts we feel the benefits are far greater than the negative affects of the dam. We therefore are in favor of setting an early date for construction and offer our full support and cooperation.

Sincerely yours

Sugar City Council and Mayor

Glenn W. Dalling
Mayor

Floyd Luke
Councilman

Lawrence P. Glover
Councilman

Melvin A. Bean
Councilman

Ronald D. Davis
Councilman

Idaho Environmental Council

P. O. Box 3371 - University Station
Moscow, Idaho 83843

April 27, 1971

Mr. H. T. Nelson
Regional Director
U. S. Bureau of Reclamation
P. O. Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

The Idaho Environmental Council appreciates the opportunity to review and comment on the draft copy of the Environmental Impact Statement for the Lower Teton Division, Teton Basin Project, as requested in your April 2, 1971, letter.

The Idaho Environmental Council is opposed to the project due to the adverse environmental impact and the questionable necessity and economic feasibility of the project.

Following is an outline and description of the Idaho Environmental Council's objections.

1. Destruction of Fishery Habitat

Seventeen miles of some of the most outstanding native cutthroat fishery remaining in Idaho will be totally inundated by the reservoir. This type of naturally-reproducing, high-quality cutthroat fishery and the associated values are fast disappearing in Idaho and have already disappeared in most other regions of the Nation. This 17-mile fishery is not just another segment of river, but is a natural environmental resource as outstanding as Teton National Park, from which the Teton River drains.

Inundation of 17 miles of habitat is only the most direct destruction that the project will have on the Teton River fishery. In the past, reservoirs have tended to evolve into ideal habitat for rough fish, and the migration of these rough fish into upper reaches of the stream system above the reservoir has often been a significant problem. Your impact statement does not comment on this possibility. In addition, downstream releases and fluctuations have been problems, and it is likely that the Teton Reservoir releases will have a significant adverse impact on the downstream fishery. The proposed minimum release of 150 cfs is only one-half of the minimum flow listed as necessary for aquatic life by the report "Aquatic Life Water Needs for Idaho Streams," by the Idaho Water Resource Board. To assume that the potential reservoir fishery could replace the stream fishery values lost is not realistic.

One of the most environmentally insensitive aspects of the Teton Project is the 6,000 feet of total stream alteration proposed below the dam to obtain the

earth and rock necessary for construction. It is surprising that the Bureau, after dismissing the environmental impact of inundating 17 miles of outstanding fishery habitat, would have the temerity to propose the destruction of another 6,000 feet of the fishery simply because the gravel in that reach of the stream is of a little better grade than gravel outside the stream environment.

Mitigation measures proposed are spawning facilities and hatchery ponds, but these can in no way mitigate for the loss of the outstanding existing natural fishery.

2. Wildlife Habitat

The project will inundate critical winter habitat for from 500 to 1000 deer and at least 50 elk. This habitat cannot be replaced. Cultivated land completely borders the reservoir area, with the result that there is little chance of migration of these big-game herds into other areas. Mitigation measures are planned to avoid the crowding of big-game animals on the remaining habitat upstream, but does not solve the problem of the enormous loss of habitat in the reservoir and downstream areas. The proposed browse planting on 700 acres and the acquisition of 430 acres for wildlife habitat will not mitigate for the big-game habitat loss.

The loss of lowland, big-game habitat is disproportionately critical since big-game animals depend on the lower valley areas for survival during the winter.

Of a less serious nature is the loss of small-game and non-game animals such as rough grouse, doves, cottontail rabbits, beaver, mink, river otters, muskrats, bobcats, weasels, skunks, and red fox. While the loss of these animals is not economically significant, their presence adds significantly to the ecologic diversity of the canyon area and to the values gained by the fisherman, hunter, or wildlife observer.

3. River Values

In view of the very few canyon areas that are not penetrated by roads and commercial activity, the Teton canyon area presents a rare opportunity for wildlife observation, photography, esthetic appreciation, and solitude. These are social losses as real as the irrigated crop values lost in a water-short year. The combination of canyon wall, narrow fluvial flood plain, and gently meandering river makes the over 18 miles of destruction environmentally unacceptable. The Teton River above the Newdale Bridge, which includes the Teton Reservoir area, was listed in May 1968 by a state ad hoc committee as potential for classification as scenic and free flowing for recreation use (attachment). This ad hoc committee was composed of representatives of the Idaho Department of Commerce and Development, the Idaho Department of Parks, the Idaho Fish and Game Department, and the Idaho Water Resource Board.

4. Proximity to Teton National Park

Teton National Park, the headwaters of the Teton River, is a national environmental resource of enormous value. The western side of the park in Idaho, which includes the Teton River drainage, is presently relatively unexploited, therefore presenting a significant potential for visitor use and economic value to the State of Idaho. One of the foremost items of resource value on the western side of the Teton Range is the Teton River, and the foremost section of that river's fishery habitat is the reach proposed for inundation and dredging. Thus, significant opportunity costs will be incurred by Idaho through the construction of the Teton dam. The three main components of resource value on the Teton west slope are (1) the Teton peaks, (2) the Teton valley, and (3) the Teton River. Total or partial loss of any of these significantly depreciates the opportunity for market and non-market value realization.

5. Economics and Necessity of the Teton Project

The flood control necessary at Rexburg and Sugar City could be realized through offset levees that prevent flood damages and preserve the river values. Flood proofing of buildings would reduce the flood risk. Agricultural flood damages could be prevented through zoning or flood insurance to cover the crop values lost.

The need for supplemental water at 78 cents an acre foot has not been demonstrated and is not realistic.

At present, the first phase and second phase of the project are separated, and the second phase has not been finalized with an environmental impact statement submitted. The first and second phases should be presented together in order to allow a comprehensive look at the project, environmental impacts, and economic justification before federal commitment to the development of the project is finalized.

SPECIFIC COMMENT ON THE ENVIRONMENTAL IMPACT STATEMENT

Page 4, second paragraph, first sentence. What water pollution protection provisions during construction will be included, and are these special provisions included in the cost estimate? Further, in the same paragraph, construction methods, river monitoring, and disposal of waste material are mentioned but not adequately described. Are the additional costs of these protective measures included in the benefit-cost estimate for the project?

Page 4, third paragraph. Has the eutrophication potential of the 17-mile-long reservoir been analyzed, including the effect on reservoir and downstream fishery habitat?

Page 5, seventh paragraph. For $2 million over the 100-year life of the facility you are proposing to excavate 17 feet below the present river level

into the fluvial deposits and extend the excavation 6,000 feet below the dam (as mentioned later in the report). Thus, you are saying that 6,000 feet of excellent cutthroat fishery habitat is worth less than $20,000 per year plus the incremental, possibly nonexistent, value attached to the higher quality gravel in the riverbed. This value assignment is questionable.

Page 6, paragraph 5. The full environmental impact of the 6.4-mile-long feeder canal originating at the Teton dam has not been evaluated and should be done so by competent fishery and wildlife management specialists.

Page 6, paragraph 6. The report states that vegetation will be planted along the banks of open canals wherever possible to provide winter protection for upland game birds. What criteria will be used to determine when such planting will occur? Such glib, meaningless statements that have no definitions or specifications are of no value.

Page 7, paragraph 5. The Idaho Environmental Council opposition to the 6,000 feet of alteration and destruction below the dam has been previously stated. However, this particular paragraph is an almost humorous illustration of irrationality. The report carefully states how excavation will occur on one side of the canyon, and then the river diverted into a channeled area in the excavated side, while the other side is excavated--then when the destruction is complete, the stream will then be diverted into its final man-made channel (canal). The next to last sentence is classic in stating that "diversion from one channel to another will not take place during the fish spawning and hatching periods." I suggest you contact the Idaho Fish and Game Department to determine the fish spawning and reproducing capability of the type of channel you are proposing in the 6,000 feet below the dam. I can assure you that protection of fish spawning and hatching will be of little consequence.

Page 8, paragraph 1. This paragraph concerns the methods of restoring the natural condition of the canyon floor so that fish and wildlife habitat may be reestablished, and the installation of rubble risers and large boulders in the channel to provide pools and riffles is specified. The cost of restoring natural fishery habitat is enormous, and if an adequate restoration is proposed, this enormous cost should be included in the project benefit-cost estimate.

Page 8, paragraph 2. Reshaping of borrow areas necessitates other large costs that should be incorporated in the benefit-cost estimate.

Page 8, paragraph 5. This second alternative appears to be the most environmentally acceptable, other than not constructing the dam.

Page 9, paragraph 2. These costs should be included in the cost of the project.

Page 10, paragraph 4. The 700 acres of browse planting and acquisition of 430 acres for wildlife habitat will not mitigate for the wildlife losses. A release of 150 cfs is one-half that required for adequate aquatic life protection, according to an Idaho Water Resource Board report.

Page 10, paragraph 6. All borrow and channelization operations should be inspected by a fishery biologist paid for by the Bureau of Reclamation, but responsible to the Idaho Fish and Game Department.

Page 11, paragraph 4. This is a narrow, inaccurate statement. The water and related land resources can be used in the manner that they have been used in the past--namely, to supply recreation and solitude. There are no environmental benefits attached to the Teton project. Flood control can be achieved through levees, flood proofing, and flood plain zoning. Flood insurance can reduce the risk of flood damage. Additional irrigation land can be developed through improved management of existing water use and development of the Snake Plain Aquifer. The last sentence states, "Leaving the water and the related land resources in their present state would forego extensive recreational and economic benefits." The Teton project will destroy, not develop, recreational benefits, and the economic benefits are very likely nonexistent, if the actual environmental opportunity costs and environmental protection costs that are referred to in your environmental statement are incorporated in the benefit-cost estimate.

Page 11, paragraph 5. Portions of the last sentence are "It is believed that development of land and water resources as now proposed will contribute more to the overall improvement and the quality of man's environment than will continuation of present uses." Anyone who believes this is a good candidate for the next federal reduction in employment.

Page 12, last paragraph. Impairment of the fish and wildlife resources is not just "possible." Such impairment, actually *destruction*, is a *certainty* and is an imprudent national cultural loss.

I wish to pose the following questions:

1. What is the maximum to minimum range of instantaneous flows contemplated below the dam?

2. What is the maximum rate of change in flow?

3. What is the minimum to maximum range of instantaneous flows in the most critical year (from the fishery standpoint) during the downstream spawning and hatching periods on a per-month and per-day basis?

4. What is the most drastic 24-hour fluctuation in the downstream reach?

5. What is the maximum reservoir fluctuation during the recreation season in an average and maximum fluctuation year?

6. What percentage of the supplemental irrigation water has been allocated to present users with greater than five acre feet per acre (recognized as the maximum irrigation requirement by the Idaho Department of Water Administration)?

In summary, the Idaho Environmental Council objects to the Teton project on the grounds that extremely valuable fishery habitat, game habitat, free-flowing river, esthetic values, and opportunity costs will be sacrificed with no economic or environmental compensation. The proposed environmental protection measures have not been specified or included in the benefit-cost estimate and will affect the economics of the project significantly.

The Idaho Environmental Council will support the Bureau of Reclamation in improved irrigation management programs and development of the Snake River groundwater aquifer, but projects such as Teton are unacceptable.

Idaho can continue its present course of destroying its truly unique and valuable resources, such as the free-flowing Teton River, or it can change direction and point to the type of quality environment that other states desire but cannot achieve. In addition to being the most environmentally desirable alternative, such a direction will likely result in greater long-term economic benefits to Idaho.

Again, let me thank you for the opportunity to review and comment on the draft copy of the Teton Environmental Impact Statement.

Sincerely yours,

H. Tom Davis

H. Tom Davis
Vice President and Chairman,
Water Development Committee

Attachment

cc: Senator Frank Church
Senator Len B. Jordan
Congressman Orval Hansen
Congressman James A. McClure
National Water Commission
Water Resources Council
Mr. Donel Lane, Chairman, PNWRBC
Mr. L. B. Day, Dept. of Interior, Seattle
Office of Water Resources Research
Dr. Robert R. Lee, Idaho Water Resource Board
Mr. John R. Woodworth, Idaho Fish and Game Department

May 2, 1968

Mr. Mark J. Pike, Coordinator
Recreation Studies
Columbia-North Pacific
110 East 13 Street
Vancouver, Washington 98660

Dear Mr. Pike:

Pursuant to your request of April 10, 1968, regarding information on rivers in Idaho which "may or may not be in need of future study to determine their appropriate use and designation," we convened an ad hoc technical advisory committee composed of the following State of Idaho agency personnel:

Mr. Lloyd Howe, Industrial Developer, Idaho Department of Commerce and Development
Mr. Wilhelm M. Beckert, Director, Idaho Department of Parks
Mr. Monte Richards, Coordinator, Basins Investigations, Idaho Fish and Game Department
Mr. Ed Imhoff, Assistant Director in charge of Planning, Idaho Water Resource Board
Mr. Tom Davis, Hydrologist, Idaho Water Resource Board.

The listing of rivers which the committee felt might be subject to classification as scenic and free flowing for recreation use is attached. I would like to emphasize that this listing is technical information only and does not represent any policy decision by the agencies represented. The listing is not necessarily all inclusive, and inclusion does not automatically preclude any form of future water development.

If I may be of any future assistance on a matter of this sort, please feel free to contact me.

Sincerely yours,

ROBERT R. LEE
Director

RRL:fdr
cc: Mr. Monte Richards
Mr. Lloyd Howe
Mr. Wilhelm M. Beckert

INVENTORY LISTING OF POTENTIAL SCENIC AND FREE-FLOWING RIVERS FOR RECREATIONAL PURPOSES IN IDAHO

Idaho Department of Parks
Idaho Fish and Game Department
Idaho Department of Commerce and Development
Idaho Water Resource Board

Definition: A scenic and free-flowing stream system (or reach of same) is one which is not impounded or deleteriously affected for recreation uses by an existing diversion or regulation.

Stream or Reach	Extent
Moyie River Drainage	All within Idaho
Priest River Drainage	Above Upper Priest Lake
North Fork Coeur d'Alene River Drainage	Above Enaville
St. Joe River Drainage	Above St. Maries
St. Maries River Drainage	Entire drainage
Clearwater River Drainage	Entire drainage excepting the Dworshak pool
Salmon River Drainage	Entire drainage
Snake River	Hells Canyon Dam to Lewiston
Payette River Drainage	Above Black Canyon Reservoir
Boise River Drainage	Above Arrowrock Reservoir
Big Wood River Drainage	Above Magic Reservoir
Big Lost River Drainage	Above Mackay
Silver Creek	Entire stream
Medicine Lodge Creek	Entire stream
Owyhee River Drainage	All within Idaho
Bruneau River Drainage	Mouth to Idaho-Nevada boundary
Snake River	Swan Falls Dam to Walters Ferry
Snake River	Hammett to Shoshone Falls
Snake River	Raft River to American Falls Dam
Portneuf River	Inkom to Chesterfield Reservoir
Blackfoot River	Above Blackfoot Reservoir
Snake River	Rigby to Palisades Dam
Salt River Drainage	All within Idaho
Teton River Drainage	From Newdale Bridge upstream
Henry's Fork (Snake R.) Drainage	Warm River to Big Springs
Falls River Drainage	All within Idaho
Bear River	Grace to Oneida Narrows

April 27, 1971

Ref: 320

IDAHO WILDLIFE FEDERATION

Affiliated with the National Wildlife Federation

ROBERT G. THOMAS, President
Box 849
Coeur d'Alene, Idaho 83814
Telephone 667-7478

JAMES D. FELTON, Vice President
2108 Birch
Lewiston, Idaho 83501
Telephone 746-2018

ROBERT J. SMITH, Secretary-Treasurer
Box 849
Coeur d'Alene, Idaho 83814
Telephone 664-4530

Regional Director,
Bureau of Reclamation, Region #1
Box 8008
Boise, Idaho

Dear Sir:

Our District #5 Chairman, Dale Taylor, Pocatello, reviewed the Environmental Statement of the Teton Basin Project. It was discussed at our recent Executive Board meeting and we offer the following.

The Idaho Wildlife Federation bears a deep and a growing concern over the loss of wildlife habitat and fishery. We inquire as to wheather any public hearing was held and if this project comes under the Environmental Protection law.

We are much concerned on the borrow areas. This, in our opinion will destroy more of the fishery. Since the project will destroy wildlife habitate we suggest other suitable lands be purchased to mitigate for this loss. Also, perhaps private lands could be leased and managed for wildlife habitat--with a guarantee public hunting would be made available. We are concerned if the pumping and diversion of the water would have an adverse effect on the down stream fishery. Mitigation for habitat and fishery loss should not wait until after the project is completed. This should have high priority as wildlife must have a place to live when they are displaced.

Yours Truly

Robert G Thomas

Robert G. Thomas, Pres.

cc: Dale Taylor

PACIFIC NORTHWEST RIVER BASINS COMMISSION

1 Columbia River
P. O. Box 908 Vancouver, Washington 98660
Telephone (206) 694-2581 (503) 285-0467

OFFICE OF THE CHAIRMAN

April 29, 1971

Mr. Harold T. Nelson
Regional Director
Bureau of Reclamation
Post Office Box 8008
Boise, Idaho 83707

Dear Harold:

Thank you for the copy of your draft environmental statement for the Lower Teton Division of the Teton Basin Project. Time does not permit the preparation of a joint view of the Pacific Northwest River Basins Commission about the environmental statement. In fact, such a review process for each specific project may not be a practical reality. These, therefore, are my views as Chairman. Commission members will each receive a copy.

The Commission files do not include the detailed report on the Teton Project and we have available to us only the recreation analysis of the Teton reservoir as prepared for you by the National Park Service. This analysis is directed at providing recreation benefits and costs associated with the projects. It really doesn't get at the environmental implications, but does provide some description.

Although the active capacity of the reservoir is very substantial, the precipitous nature of the topography may make public use of the area acceptable without severe environmental impacts. This account could be strengthened.

The minimum flow of record just below the dam site is noted to be 214 c.f.s. and the proposed releases are scheduled at 150 c.f.s. From the information available to us it is difficult to evaluate the environmental or esthetic impact of this flow. This aspect might be worthy of some attention in your statement.

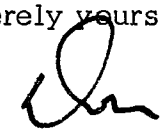
Some discussion of the maintenance of water quality to state standards below the reservoir on the basis of regulated stream flows would appear to be appropriate to an environmental impact statement.

The general discussion of environmental impact responsive to Section 102(2)(c) of the National Environmental Policy Act of 1969, items (i) through (v), seems quite adequate under (i) with the above noted suggestions. But the discussion under items (ii) Any adverse environmental effects which cannot be avoided should the proposal be implemented; (iii) Alternatives to the proposed action; (iv) The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity; and (v) Any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented, appear worthy of further discussion. For example, it seems reasonable to examine esthetic advantages under development, looked at in a positive light.

The alternative to the proposed action which consists of doing nothing seems to be worthy of further discussion since doing something is predicated to be a more attractive alternative. The alternatives discussed are variations of design and locations of physical works. The one sentence discussion of leaving the water and related land resources in their present state could be expanded.

It is probable that the environmental statements that follow will fall into regular patterns. The earliest statements are necessarily the most difficult. I think that if you have erred at all, it is on the side of excessive treatment of the first of the five questions and on the side of minimal treatment of the remaining four questions. However, on the basis of the information available to us in your statement and in our files, I do not suggest any revision of your draft, except as these comments may direct your attention to possible points that could be strengthened on the basis of information available in your files.

Sincerely yours,



Donel J. Lane
Chairman

THE TREASURE VALLEY CHAPTER
P. O. BOX 7452
BOISE, IDAHO 83707

STATEMENT
Treasure Valley Chapter Trout Unlimited
Concering The
Draft Copy of the Environmental Impact Statement
Lower Teton Division, Teton Basin Project
April 29, 1971

Mr. H. T. Nelson
Regional Director, U. S. Bureau of Reclamation
P.O. Box 8008, Boise, Idaho 83707

This statement in summary form lists our primary objections concerning the draft copy of the Environmental Impact Statement and the Lower Teton Division, Teton Basin Project.

1. The draft copy of the environmental statement if not sufficient and is no more than a project justification statement. It does not assign value to environmental losses which will be the result of this project, although it does name them in part. Without an assigned value to these losses and the inclusion of the values in the "cost/benefit" ratio we must question the legitimacy of the ratio as a justification for the project. We insist upon a more comprehensive project environmental study to be consistant with the increasing concern for ecology and environment before further construction is undertaken.

2. The supposed human environmental enhancements listed on page one are misleading. a.) The supplemental water value would appear to be simply an enhancement of human economics not environment. The water shortage chart included in the reconnaissance report indicates little if any water shortage in the supplemental area since 1937. Using the year of the greatest shortage of water as justification for the project is an obvious exaggeration of the irrigation needs. b.) "Producing electrical energy from a nonpolluting prime mover source." Dams are irreversible and not considered as "nonpolluting" today. c.) "Establishing an attractive water-based recreational asset." This statement can easily be refuted by the National Park Service data dated March, 1960, included in your reconnaissance report: "Due to lack of vegetation on surrounding lands, camping and picnicking would be very limited" and "due to the precipitous nature of the canyon, access to the water would be difficult, particularly during the summer drawdown season." d.) Flood protection benefit seems minimal considering flood damage cost reported in the past. It is more reasonable and definitely less costly to the taxpayer to implement a federal subsidy payment to farm and crop losses following a flood. Preservation and controled use of the natural flood plain would negate the necessity of the dam.

3. The so-called environmental impact statement (draft copy) does however point out some large environmental losses. "The fishery in the canyon portion of the Teton River is one of the finest in Idaho and contains a self-sustaining population of cutthroat Trout." As an organization

THE TREASURE VALLEY CHAPTER
P. O. BOX 7452
BOISE, IDAHO 83707

dedicated to the propagation of our fisheries this statement alone is enough to draw our opposition to the project. No amount of money could mitigate this loss to our ever decreasing prime fishing streams. It is bad enough to inundate 17 miles of a "river which compares favorably with the best cold-water fisheries in the nation." But to choose a 6000 ft. "borrow area" below the damsite is an ecological tragedy. The U. S. Bureau of Sport Fisheries and Wildlife stated, "we cannot approve the downstream borrow area until we are convinced that serious losses can be prevented ... we would be pleased to explore any alternate measures you propose that may accomplish the same purpose." None were forwarded to them but instead a study to determine rehabilitation possibilities of this area was undertaken by your department. We submit that a rehabilitation plan that would completely restore the area to the ecological condition preceding the destruction is not possible today and would carry an exhorbitant price tag.

4. There has been no evidence presented that mitigation measures taken to replace or relocate the wildlife of the canyon will be successful. Reports from other agencies indicate that as with the fisheries a complete loss of wildlife would result.

5. "The contractor's methods of construction must be performed in a manner that will prevent entrance or accidental spillage of solid matter, contaminates, debris and other objectionable pollutants in the Teton River." Our recent research and observation of the area shows that this has already occured. Road construction started last October and completed this winter has produced channel changes, obliteration of stream beds by bulldozers and complete elimination of numerous stream areas. It is our understanding that the environmental impact statement was to have been cleared before money could be given for construction. The road was built without approval of the environmental studies and without contacting any other agency that would be concerned with its construction directly or indirectly.

Based on our serious concern over this project we plan to continue our study and will present a more detailed opposition paper at a future date. Our study has the full support and resources of the Northwest Steelheaders Council of Trout Unlimited and of our National Trout Unlimited organization.

Sincerely yours,

Ronald Irvin
President

Harry D. Van Brunt
Vice President

James Ahrens
Secretary

Kenneth I. Cameron, O.D.
Chairman, Policy Committee

KIC/mg

TROUT UNLIMITED
5650 EAST JEWELL AVENUE
DENVER, COLORADO 80222
303 - 757-7144

April 29, 1971

Mr. H. T. Nelson, Regional Dir.
U.S. Department of the Interior
Bureau of Reclamation
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

Have recently had an opportunity to look over your Environmental Impact Statement on the Teton Basin Project. Several questions occur to me and I would therefore request your comments on the following:

1. The last benefit cost ratio calculation appears to have used 2-7/8% as an interest figure. Has this been revised to reflect current interest rates?

2. In arriving at a cost for mitigation of the 17 miles of Teton River which will be lost when the reservoir fills, what factors did you use to determine a cost for a mile of lost stream over the 100 year life of this project? Our organization has been trying to get a usable formula for this purpose for some years. We would appreciate knowing of your formula as you must have spent considerable time and effort creating it and it would assist us greatly in our efforts. This also applies to the area below the dam site from which you will take fill.

3. You speak of flood control benefits and refer to the flood of 1961 - 1962. If my information is correct, considerable flooding occurred at this time along the Henrys Fork above it's confluence with the Teton. This in spite of the fact that there are dams on that river. What assurance is there that the Teton Dam will safeguard the lower valley?

4. Finally, did you evaluate the most obvious alternative, which would be to not build the dam at all and provide other flood control devices such as levees?

Please make this letter a part of the record.

Thank you for your time and effort. I will anticipate your reply.

Sincerely,

R. P. Van Gytenbeek
Executive Director

RPVG:ec

cc: Boise Chapter
Jerry Jayne
Idaho Fish & Game
Capt. Raymond A. Kotrla (Ret.)
Tom Davis

120.01

R. WILLIS WALKER, CHAIRMAN | LARUE FRANSEN, SECRETARY | L. C. ANDERSON, TREAS.-ASST. SEC.

FREMONT-MADISON IRRIGATION DISTRICT

ST. ANTHONY, IDAHO 83445

BOARD MEMBERS
LORIN C. YOUNG
MARVIN C. MEYERS
EMERY DAVIS

April 28, 1971

U. S. Department of the Interior
Bureau of Reclamation
Regional Office, Region 1
Box 8008
Boise, Idaho 83707

Gentlemen:

I am enclosing herewith copies of Resolutions passed by the Membership and the Board of Directors of the Fremont-Madison Irrigation District April 20, 1971.

We feel that the ecologists and the environmentalists, as well as all of us, must use good judgment and common sense when it comes to the preservation of our natural resources and wildlife. However, we must remember that the preservation of mankind and the use of our natural resources and wildlife for the welfare of mankind, is just as important as the welfare and preservation of the fish.

I was very impressed by an article in the U.S. News & World Report of April 26, 1971, on page 52, entitled "Business Takes On Its Critics" and would like to refer this article to you. I think you would also find it interesting.

Yours very truly,

FREMONT-MADISON IRRIGATION DISTRICT

R. Willis Walker

By:
R. Willis Walker, Chairman

rs

Enclosures

RESOLUTION - BOARD ACTION

WHEREAS, the Upper Snake River area, particularly the lands of the Fremont-Madison Irrigation District, is subject to frequent severe drouth conditions such as occurred during the summer of 1961, and

WHEREAS, this same area is also flooded by late winter and spring run-off such as occurred in February, 1962, which caused severe damage to lands and improvements both locally and in the Upper Snake River area downstream, and

WHEREAS, the economy of the Upper Snake River area is in need of strengthening, and

WHEREAS, the Congress authorized (P.L. 88-583 September 7, 1964) the Lower Teton Division, Teton Basin Project over 6½ years ago based on the proposition that the Division would provide supplemental water to 111,000 acres which have suffered such severe drouth conditions within the past decade and would also provide essential flood control for both rural and urban areas which are susceptible to damaging floods on almost an annual basis, and

WHEREAS, the needed hydro-electric power which will be generated at site will not pollute either the air or the water, and

WHEREAS, a major recreational complex will be developed at the reservoir which will provide essential opportunities and facilities both for local residents and for thousands of others from areas outside of the Upper Snake River area and Idaho, and

WHEREAS, extensive measures such as rehabilitation of the canyon area, including all borrow areas and the stream bed, will be part of the project development to mitigate unavoidable detrimental effects on fish and wildlife, and

WHEREAS, the project development program provides approximately one million dollars for such mitigation measures which will also include spawning facilities, hatchery ponds, fish screens at canal heads and the intake to the pumping plant, wildlife protective fencing, browse planting on 700 acres and acquisition of 430 acres for wildlife habitat, and

WHEREAS, state and federal anti-pollution regulations are a part of construction specifications and will be strictly enforced to assure that construction operations and methods do not violate such regulations, and

WHEREAS, continuing studies, observations and close supervision will be made during construction to overcome or alleviate any adverse environmental impacts which might accrue, and

WHEREAS, the project will also maintain minimum flows at Teton dam of at least 150 cubic feet per second from the reservoir, and

WHEREAS, residents of the Upper Snake River area have urged development of theproject for many years, and

WHEREAS, the State of Idaho officials supported authorization of the Lower Teton Division as a direct multiple-purpose development of major importance to Idaho, and

WHEREAS, the Fremont-Madison Irrigation District overwhelmingly approved by vote of its membership a re-payment contractcovering the portion of the irrigation cost allocation of the Lower Teton Division determined by the Bureau of Reclamation to be within the water users ability to repay, and

WHEREAS, it is the view of the Fremont-Madison Irrigation District that the development plan for the Lower Teton Division is the most logical means to meet the urgent needs to upper Snake River area, and

WHEREAS, the District sees no alternative program for utilizing the water and related land resources which would provide equivalent over-all economic social and environmental benefits at a comparative cost.

THEREFORE, BE IT RESOLVED that the Board of Directors of the Fremont-Madison Irrigation District strongly supports continued work and urges full funding towards the early completion of construction of the Lower Teton Division, and

BE IT FURTHER RESOLVED that copies of this Resolution be forwarded to the Secretary of the Interior, the Commissioner of Reclamation, the Congressional delegation from the State of Idaho, the Governor of the State of Idaho, the Water Resources Board of the State of Idaho, and

BE IT FURTHER RESOLVED that copies of the Resolution be forwarded to the Regional Director, Region 1, Boise, Idaho, to serve as the District's comments on the environmental statement prepared by the Bureau of Reclamation on the Lower Teton Division, Teton Basin Project as required by the National Environmental Policy Act of 1969.

CERTIFICATE

STATE OF IDAHO,)
(SS
County of Madison.)

I, L. C. ANDERSON, Assistant Secretary of the above named Fremont-Madison Irrigation District, do hereby certify that the above is a true and correct copy of a Resolution passed by the Board of Directors of the Fremont-Madison Irrigation District at a special meeting held this 20th day of April, 1971.

/s/ L. C. Anderson
Assistant Secretary.

(Seal)

RESOLUTION - MEMBERSHIP ACTION

WHEREAS, the Board of Directors of the Fremont-Madison Irrigation District has worked long and arduously for the early development of the Lower Teton Division, Teton Basin Project, believing it to be in the best interests of the District, residents of the Upper Snake River area, residents of the State of Idaho, the West, and the Nation, and

WHEREAS, the membership of the Fremont-Madison Irrigation District recognizes the efforts of the Board and strongly supports them in these efforts, and

WHEREAS, the Board of Directors has passed a Resolution urging continued work and full funding, looking towards early completion of construction of the Lower Teton Division, and

WHEREAS, the entire membership wholeheartedly endorses the Board's action in this regard, and

WHEREAS, the membership believes the project can be developed as planned without a serious loss of fish and wildlife resources,

THEREFORE, BE IT RESOLVED that the membership of the Fremont-Madison Irrigation District here assembled endorse the Resolution as passed by the Board of Directors and urge the Board oto continue its efforts in support of the early completion of the Lower Teton Division, and

BE IT FURTHER RESOLVED that copies of this Resolution by the membership of the Fremont-Madison Irrigation District be forwarded to the Secretary of the Interior, the Commissioner of Reclamation, the Regional Director, Region 1, Bureau of Reclamation, the Congressional delegates from the State of Idaho, the Governor of the State of Idaho, the Idaho Water Resources Board, and the Idaho Department of Water Administration, and

BE IT FURTHER RESOLVED that in accord with the membership's views regarding the essential need for development of the Lower Teton Division, the Bureau of Reclamation be urged to complete its studies of the Second Phase at the earliest possible moment.

CERTIFICATE

STATE OF IDAHO,)
(SS
County of Madison.)

I, L. C. ANDERSON, Assistant Secretary of the above named Fremont-Madison Irrigation District, do hereby certify that the above is a true and correct copy of a Resolution passed by the Membership of the Fremont-Madison Irrigation District at a special meeting held this 20th day of April, 1971.

L. C. Anderson
Assistant Secretary.

(Seal)

FREMONT-MADISON IRRIGATION DISTRICT

ST. ANTHONY, IDAHO 83445

May 13, 1971

Mr. Ellis L. Armstrong
Commissioner of Reclamation
Bureau of Reclamation
Washington, D. C.

Dear Mr. Armstrong:

On May 7, 1971, at the Water Resource Board meeting in Idaho Falls, Mayor S. Eddie Pedersen made a very fine statement on behalf of the Teton Dam and its relation to flood control, agriculture, and ecology in this area. I am enclosing herewith a copy of the same.

I am also enclosing a statement made at this meeting by J. Leigh Chantrill, who has lived within three miles of the proposed Teton Dam for more than fifty years. Also, a statement made by Donald Trupp who for a number of years has lived in the immediate area of the Teton Dam site. The statements presented by these men show very definitely that the claims made by the ecologists and environmentalists are just not correct. It is very doubtful if any of them have been in this area and made a personal investigation. The people in the Upper Snake River Valley are very disturbed to think that a few individuals who have never seen nor investigated the area could stop the progress of this worthy project that was authorized in 1964 and will do so much good for the people of this valley.

As you will recall, the bill authorizing the dam passed Congress without one dissenting vote and in 1967 the Idaho Legislature, by joint resolution, urged Congress to provide funds for the construction of the dam. We would appreciate your help at this critical time in order that the construction of the Teton Dam might proceed without delay and extra cost.

Yours very truly,

FREMONT-MADISON IRRIGATION DISTRICT

By: R. Willis Walker
R. Willis Walker, Chairman

rs

5/21

May 7, 1971

STATEMENT OF MAYOR S. EDDIE PEDERSEN
CITY OF IDAHO FALLS

LOWER TETON DIVISION TETON BASIN PROJECT

MR. CHAIRMAN AND MEMBERS OF THE IDAHO WATER RESOURCE BOARD:

I APPRECIATE THE OPPORTUNITY AFFORDED ME TO APPEAR THIS MORNING ON BEHALF OF THE LOWER ON DIVISION TETON BASIN PROJECT AND TO SPEAK FAVORABLY IN ITS BEHALF.

THE PAST WEEK AND FOR AN UNKNOWN NUMBER OF DAYS AHEAD, WE ARE FIGHTING FLOOD AND RECOGNIZING PHYSICAL EVIDENCE OF COSTLY WASTE FROM A STREAM SUCH AS WILLOW CREEK WHICH HAS REMAINED ONTROLLED. IN addition TO THE MONEY AND MAN-POWER WASTED THE REAL CONCERN AND ANXIETY OF SE IN THE FLOOD PLAIN ARE EXPRESSED TO MY OFFICE CONTINUALLY. IT IS UNFORTUNATE THAT YOU NOT SHARE WITH ME THE GROPPING FOR ANSWERS AT THIS TIME.

THE TETON RIVER IS ANOTHER SUCH STREAM NEAR WHICH PEOPLE ARE EXPERIENCING ANXIETY FOR FEAR WHAT MIGHT TAKE PLACE IN THEIR AREA LATER THIS SPRING. WE HAVE REAL CONCERN THAT THERE IS POSSIBILITY THAT MAYBE THE BENEFITS OF THE MULTIPLE PURPOSES OF THIS WATER RESOURCE DEVELOP-NT TO SOURTHERN IDAHO AND, PARTICULARLY, THE UPPER SNAKE RIVER BASIN MIGHT NEVER BE REALIZED.

WE WONDER WHAT THE FUTURE HOLDS WHEN WE HEAR THAT ATTEMPTS WILL BE MADE TO ABATE ANY THER DEVELOPMENT OF IDAHO SURFACE WATER SUPPLIES.

I ESPECIALLY WANT TO EMPHASIZE MY PERSONAL CONCERN THAT WE OBTAIN ASSURANCE FROM THOSE WHO SIGN ANY DAM ON THE TETON RIVER, AND BE FULLY COGNIZANT OF THE IMPORTANCE OF THE MITIGATION ANY DISRUPTION OF THE ECOLOGICAL STATE OF THIS STREAM. IT IS WELL TO NOTE THAT PART OF THE ANNING AND FUNDING ALLOWS FOR MITIGATION OF SUCH DISRUPTION OF THESE RESOURCES.

HOWEVER, TO STOP ANY FURTHER CONTROL, FOR MAXIMUM UTILIZATION OF OUR WATER, LEADS ONE WONDER WHAT WOULD EXIST IF OUR FORE-FATHERS HAD HAD THIS SAME ATTITUDE. REALLY, WE WOULD T HAVE TO WONDER VERY LONG TO REALIZE THAT DESERT WOULD PREVAIL AND THAT CITIES LIKE AHO FALLS, TWIN FALLS, AND EVEN THE CAPITAL OF THE STATE, BOISE, WOULD NOT EXIST OR AT LEAST T AMOUNT TO MUCH WITHOUT DEVELOPMENT OF WATER AND LAND. SOUTHERN IDAHO, AS GOD MADE IT, ST WOULDN'T SUPPORT MANY PEOPLE. IT TOOK MAN'S INGENUITY AND HARD WORK TO CONVERT GOD'S RAW TERIALS INTO A LIFE SUSTAINING, USEFUL AREA.

AS THE MAYOR OF THE CITY OF IDAHO FALLS, I MUST SPEAK OUT AND POINT OUT THE IMPORTANCE OF WATER AND LAND RESOURCES DEVELOPMENT TO THIS CITY. RESERVOIRS IN THE UPPER SNAKE RIVER BASIN AFFORDED US PROTECTION FROM FLOODS, PROVIDED IRRIGATION TO BOOST OUR ECONOMY, SENT US POWER FOR OUR INDUSTRY, BUSINESSES, HOMES, AND MAKES AVAILABLE WATER ENERGY, RECREATION UTILIZATION FOR OUR CITIZENS. THE LOWER TETON DIVISION WILL ADD ITS CONTRIBUTION TO THESE BENEFITS.

THE SNOW PACK THIS YEAR IN THE UPPER SNAKE RIVER BASIN IS A MAXIMUM RECORD OR CLOSE TO IT. WE ARE LOOKING TO THE FLOOD PROTECTION PROVIDED BY STORAGE IN JACKSON LAKE AND PALISADES RESERVOIRS WHEN THE HEAVY SNOW MELT STARTS. IF FLOOD STORAGE SPACE WERE AVAILABLE NOW IN THE PROPOSED TETON RESERVOIR, THE WHOLE UPPER SNAKE RIVER BASIN, INCLUDING IDAHO FALLS WOULD BE THAT MUCH MORE SECURE.

THE FIRST PHASE OF LOWER TETON DIVISION WILL SUPPLY SUPPLEMENTAL WATER TO ABOUT 111,000 ACRES IN THE FREMONT, MADISON IRRIGATION DISTRICT. THIS DOES NOT APPEAR IMPORTANT TO SOME PEOPLE BUT IT IS TO US IN IDAHO FALLS. THIS WATER SUPPLY WILL CREATE CLOSE TO $1,000,000 IN ANNUAL BENEFITS SOME OF WHICH WILL SHOW UP IN OUR CITY. ALSO, THE 20,000 K.W. POWER INSTALLATION WILL PRODUCE ABOUT 92 million K.W.H. OF ENERGY ANNUALLY TO ADD TO THE MAJOR POWER SUPPLY. THIS, ALONG WITH DEPENDABLE CAPACITY OF 13,000 K.W. WILL PROVIDE ANNUAL BENEFITS IN THE VICINITY OF $450,000. THE CITY OF IDAHO FALLS UTILIZES POWER FROM THE FEDERAL PALISADES PROJECT AND SUPPORTS ADDITIONAL FEDERAL POWER DEVELOPMENT IN THE GENERAL AREA.

HAVING BEEN AN OUTDOORSMAN FOR MANY YEARS, THE EFFECT OF RESERVOIRS HAS BEEN OF PARTICULAR INTEREST, AS A CONSERVATIONIST I HAVE PAID ATTENTION TO BENEFITS OF RESERVOIRS AND ITS EFFECT ON DOWN STREAM FISHERY AND WATER QUALITY. MY OBSERVATION IS THAT THE DOWN STREAM FISHERY HAS IMPROVED OVER CONDITIONS EXISTING BEFORE CONSTRUCTION OF PALISADES DAM. IN FACT, UTILIZATION HAS INCREASED MANY FOLD. AT ANY RATE, IT DOES NOT APPEAR TO HAVE BEEN A DETERIORIATION OF WATER QUALITY. ONE MIGHT ASSUME THAT THE RESERVOIR ACTUALLY IMPROVED THE DOWN STREAM WATER QUALITY AND PRODUCTIVITY.

THERE IS NO DOUBT THE CONSTRUCTION OF TETON DAM AND RESERVOIR AS NOW PLANNED, WILL ELIMINATE ABOUT 18 MILES OF NATURAL FLOWING STREAM. THERE IS NO WAY TO ACCOMPLISH THE JOB WITHOUT THIS RESULT, HOWEVER, A NUMBER OF MITIGATION MEASURES WILL BE TAKEN AS IS REASONABLE AND POSSIBLE TO HELP MAINTAIN THE ENVIRONMENT AND ALLEVIATE, AT LEAST TO SOME DEGREE, THE DAMAGE THAT MIGHT BE DONE TO THE NATURAL STREAM, FISHERY AND WILD-LIFE HABITAT. CONSIDERING SUCH MITIGATION MEASURES AND THE IRRIGATION FLOOD CONTROL, POWER AND RECREATION BENEFITS, INCLUDING RESERVOIR FISHERY THAT WILL BE CREATED, THIS DEVELOPMENT APPEARS TO BE A NEED FOR THE AREA AND THE STATE OF IDAHO.

THE LOWER TETON DIVISION WHICH WAS AUTHORIZED IN 1964 IS NEEDED IN OUR AREA AND WE HAVE SAID IT FOR A LONG TIME.

IT IS RECOMMENDED THAT MAJOR CONSTRUCTION BE ITITIATED AT THE EARLIEST OPPORTUNITY AND THAT IT BE COMPLETED AS QUICKLY AS POSSIBLE.

May 7, 1971

I am J. Leigh Chantrill, Newdale, Idaho
Madison County Farmer
Director Fremont-Madison Irrigation District
Chairman Madison Agricultural Advisory Committee
Past President and Director Madison County Wheat Growers
Past President and Director Canyon Creek Canal Company
Past Chairman Madison County A.S.C. Committee

I have lived within 3 miles of the Teton River for more than 50 years. The lower Teton Dam will be very beneficial for the irrigated farms in our district that need the supplemental water. Every year the Canyon Creek Canal Company and the Ashton area need supplemental water, and the remaining areas need it most of the years. The Village of Newdale needs a firm supply of irrigation water every year.

This dam will hold upstream water close to the main watershed of the Upper Snake River and other streams. This will help keep more of our Idaho irrigation water where it can be used most advantageously.

Over 90% of the farmers in our district which now includes the new land in the Second Phase of the project voted for the project.

We as directors of Fremont-Madison Irrigation District and sponsors of the Lower Teton Project feel a great obligation to the water users to do all we can to see that this project is brought to a completion without further delay and much added expenses to all concerned with the project.

Let's build facilities to keep Idaho water for our citizens to use.

FLOOD CONTROL

If you haven't experienced a flooded farmstead and farmlands you would have difficulty in putting a value on flood control. We have seen flood water do damage to our farm every year. The farmers in the Rexburg and Roger City areas are willing to help financially every year for flood

control even though some may not need the water except in water short years.

The flood waters severely damage river banks as can be observed just east of Highway 191 north of Rexburg.

In years like 1970 and 1971 the Lower Teton could hold enough flood flow to go toward filling the reservoir with flood water that will be lost from our state.

FISH AND WILD LIFE

I hunted for deer on the river in 1957 when reportedly 2000 deer were to be killed in late season. We managed to get one each in a long day of hunting. Those 2000 deer were not found in Teton Canyon. The report stated 500 to 1000 deer were currently in the canyon.

Last winter we made snowmobile trips along the river to try to spot big game. We saw none. I was told that about 14 head were seen on Canyon Creek in the area that would be covered by the reservoir.

I would suggest that a count of the big game be made next winter so some actual figures as to number can be presented.

From all my years living near the Teton River I have never found the wild life to justify the estimates made in that report.

I started fishing along the section of the Teton River that is included in the damsite and reservoir as soon as I was old enough to use a fish pole. The fishing has been poorer each year. The game department has not re-stocked this area becuase they can not get to this section of the river with trucks.

On our last boat trip down the river in two boats we caught less than two fish per fisherman. This poor fishing condition was confirmed by our senior fish and game conservationist in a recent conversation. None of the local fish and game personnel that I have talked to are against dam construction.

I read the Authorizing Report on the Lower Teton Division compiled in 1962. In that report I studied the Fish and Game report. I observed some very high estimates of big game on the Teton River.

In all the years I have fished the river in the summer I have not seen any big game. I had to be on the alert at all times for rattle snakes as they have always been along this stretch of the river. The lake would eliminate their habitat.

RECREATION

We in this part of the state have observed the greatly increased use of Island Park reservoir for fishing and hunting. It can not be stopped unless there are additional lakes and facilities developed in other areas. If one will study the plans for the Teton Project they will see the recreation value that is being built into the plans.

Few people visit the Teton River in this area because of the inaccessibility to the river.

STATEMENT MADE BY DONALD TRUPP BEFORE IDAHO WATER RESOURCE BOARD MEETING, MAY 7, 1971, AT IDAHO FALLS, IDAHO

My house is on the rim of the Teton Canyon less than 100 yards from the Teton River. It is about 1-1/3 miles downstream from the dam site.

A considerable amount has been said about 6000 feet of canyon floor below the dam site. I can see about 4000 feet of the 6000 feet from my front doorstep. 2000 feet goes through my property.

I lived there during the summer from 1941 until 1948. From 1948 to 1953 I operated this farm with my father and brother and went to college. From 1953 to 1955 I was in the service. Since 1955 I have lived on the property year round.

I have hunted, fished, and floated the Teton River that covers the area proposed by the reservoir. In the 30 years of living here - fishing and floating the river and hunting the area, I have never seen during that total time half the game that some individuals say winter over each year. 90% of the area where I have seen game will not be flooded by the dam.

This past winter I have made over 20 trips up the Canyon either by Snow-machine or 4-wheel drive. Except for one deer, all game I saw was well above the proposed reservoir area. In the past years only very small herds occasionally get into the area of the reservoir. One reason for this is that more and more of the canyon is being grazed to the point that no feed is left.

The most game along the canyon was during the years soil bank land was along the river, and they stayed in it. This could be done again with great results. The Bureau of Reclamation has this in their plans when the dam is built. About 350-400 people enjoy this area each year. This many people could enjoy it in one day if the dam is constructed. If people think that silt from dam construction will damage fish, they should see it now. There is an old saying about the river each summer about now "It's too thick to drink and too thin to plow." This problem would be eliminated by the dam.

I know of no portion of the canyon that will be flooded that is not privately owned. This brings up two things -

1. Each rancher will graze the canyon
2. It is privately owned and public exclusion is becoming a must. There are no public roads to the river. Sportsmen must cross private property to get to the river or canyon.

With the increase in littering and vandalism and legal suits, each rancher becomes more nervous when strangers come on their property, so they are not allowing it.

On the 10th of May, 1971, one of my young 500 pound bulls was shot and killed by someone who was not supposed to be there. This is not the first time this has happened. When the Bureau of Reclamation wanted access to the damsite through my property, I told them they could have it free of charge if they would exclude the public. This was the only point that was difficult agreeing on.

I have no flooding problems from the river because of the terrain of my property. But I have many friends in Rexburg , Sugar-Salem, Teton and on down the river that do. This morning the river is running 2500 sec. feet and is beginning to flood. It can easily creak to 4,000 sec. feet if weather conditions are right. We have a tremendous snow pack above us that could come down all at once.

I have nothing to gain by selling property to the government for the project because they have all they need from me. I will gain by getting needed water for late in the season. At the present time I take up the late season slack with a well. So this is not a great gain. But I have many neighbors who are way short of water.

Definitely I will have to look at some scars from construction but the county, state and nation will benefit from it and I can't think of anything better for all concerned than to start construction on the project as soon as possible.

I know of no one in the area that is against the project and what winter range will be destroyed can be readily replaced. The recreation can be greatly increased with the lake.

I will be glad to discuss this with anyone.

Sincerely,

Donald D. Trupp

Donald D. Trupp
P. O. Box #3
Newdale, Idaho 83436

North Fork Water Users Protective Association

St. Anthony, Idaho
May 27, 1971

Mr. Harold T. Nelson
Regional Director
U.S. Bureau of Reclamation
P.O. Box 8008
Boise, Idaho 83707

Dear Mr. Nelson,

The North Fork Water Users Protective Association, an organization of 40 canal companies in the Upper Snake River Valley located on the Henry's Fork of the Snake River, Fall River and the Teton River unanimously support the early construction of the Teton Dam for the following reasons:

1. It will provide much needed supplemental water for irrigation.

2. Flood Control - The Teton River is the only uncontrolled river in the area which has continuously done wide spread damage by flooding valuable farm land, homes, etc.

3. Upon completion it will provide a recreation area second to none in Idaho; boating, fishing, camping and etc.

4. It is the only reservoir in the area so designed that will not destroy valuable farm or ranch land by inundating with water. The entire reservoir water body will be confined within the canyon walls.

5. It will provide much needed electrical power for pumping and other farm and city uses.

6. It will improve the quality of the water by acting as a 17-mile settling and filtering pond.

7. Our records show on August 17, 1935, the farmers and ranchers of the area was assured by Senator D. Worth Clark, then Senator from Idaho, that construction would start on a Teton Dam and Reservoir in 1936. At the most recent hearings before the Interior and Insular Affairs Committee, not one voice of protest was heard against this project After 36 years of study and delay we feel construction should start immediately.

Sincerely yours,

Cy Young

Cy Young, Secretary

PROGRESSIVE IRRIGATION DISTRICT
BONNEVILLE AND JEFFERSON COUNTIES, IDAHO
OFFICE OF THE SECRETARY
ROOM 202 SALISBURY BUILDING
IDAHO FALLS, IDAHO 83401

April 29, 1971

Harold T. Nelson, Regional Director
United States Department of Interior
Bureau of Reclamation, Region 1
Box 8008
Boise, Idaho 83707

Dear Mr. Nelson:

As an Irrigation District we approve the construction of the Teton Dam and Reservior. It would remedy the flood hazard as well as make supplemental irrigation water.

We commend the Bureau of Reclamation for the great amount of work that they have done in cooperating with the Environmental Act.

The experience in Eastern Idaho clearly shows that the recreational utilization of an area is always enhanced with the construction of reservoirs. It happened at Island Park and at Palisades and there is no reason to expect any other result from the construction of the Teton Dam and Reservoir.

The present River Canyon is largely inaccessible and not freely used. A lake in that canyon will provide far more recreactional opportunites for many more people than the present River affords.

Yours very truly,

Lawrence Ricks, President
C. N. Scoresby, Director
C. Kent Ward, Director
Board of Directors

I have been authorized by the Board of Directors of the Progressive Irrigation District to send this letter with my signature as Secretary.

Alvina Beale
Alvina Beale
Secretary

The Idaho Irrigation District

IDAHO FALLS, IDAHO, 83401
April 7, 1971

Mr. H. T. Nelson, Regional Director
Bureau of Reclamation - Region No. 1
Box 8008
Boise, Idaho 83707

Re: 320

Dear Harold;

Thanks for the privilege to lend my comments for the fine work tobe done at Lower Teton Division.

First I have some interest in this project. 1962 of course was the block buster but in early 1964 as I remember, I spent two days or so in the area with Ralph Harding, Willis Walker and others, collecting flood data for Ralph's presentation for authorization by Congress.

KID TV provided coverage, at one point I left the sunny side of my trousers hanging on a bard wire fence, needless to say that section of the film was cut. The Fremont-Madison Canal people have aggreed to replace the trousers when the dam is finished.
"PLEASE RUSH CONSTRUCTION"

The mud buildup here and erosion there plus the anguish look on the faces of helpless people was a sight to remember and I'm not ashamed of the fact that I have driven -- home? -- a few needles to help bring about some remedies for such needless conditions.

Multi-purpose resource projects have by far the greatest usuage, the time has long since passed when The United States Government can set aside millions of acres for only my rugged wife and me to visit once each two or three years.

The consideration for enviromental conditions, vegetation replacement are all outstanding.

Sportsmen them selves could do much to improve local conditions, I have long suggested spawning beds of perhaps ten to twenty acres, undesturbed by fishermen or boatmen, below each resource project, at pool level and above sportsmen could plant bitter brush and other shrubs for bird and wildlife plus erosion control.

I have been pleasantly exposed to many Regional and National Interior people and knowing their great love for God's great out doors, their concern for fish, birds, wildlife and people I have no fear for the enviromental balance they will strive for on this project.

Yours for "A Heap O' Livin'" in clean, pleasant surroundings.

Sincerely

Russell Holm - R. 2 Box 173 Shelley, Idaho
83274