

PO Box 633 Boise, ID 83701 800-574-7481 Fax 208-343-9376 www.idahorivers.org

> EXECUTIVE DIRECTOR

Bill Sedivy Boise

## BOARD OF DIRECTORS

Ken Anderson Boise

Cherie Barton Boise

Peter DeLuca Boise

Buck Drew Ketchum

Rick Eichstaedt Spokane

Kathleen Fahey Boise

Peter Grubb Coeur D'Alene

LuVerne Grussing Juliaetta

> John Heimer Boise

Jessica Holmes Boise

Tom Kovalicky Grangeville

Andy Munter Ketchum

Keith Stonebraker Juliaetta

> Tom Stuart Boise/Stanley

John Wells Ketchum February 7, 2013

Comments on the Columbia River Treaty Review

Thank you for this opportunity to comment on issues of concern in this phase of the Columbia River Treaty review.

Idaho Rivers United is a statewide river conservation organization founded in 1991. Our mission is to protect Idaho rivers and native fish. Our members use and enjoy Idaho's rivers, including many in the Columbia River Basin, and have a stake in the Columbia River Treaty.

The ecological integrity and functioning of rivers and many of the benefits of rivers, are largely dependent on the timing, quantity and quality of river flow. The highest integrity is found in rivers with natural hydrologic regimes. River alterations of the 19<sup>th</sup> and 20<sup>th</sup> century disrupted hydrologic regimes in hundreds of miles of Idaho rivers, including the Boise and Snake rivers. Many species were extirpated or driven to extinction, and many ecosystems were permanently compromised. But over the decades new ecosystems have been established in many rivers that provide valuable benefits to Idaho's communities.

The lower Boise River is a case in point. The Boise River offers superb fishing, floating and swimming and provides habitat to numerous bird and wildlife species. Three upstream reservoirs greatly alter the natural hydrology, but the consistent operation of the reservoirs has allowed a new ecosystem to be established.

Idaho Rivers United is greatly concerned that space in the Boise River reservoirs and in other reservoirs in the upper Snake River Basin may be "confiscated" to provide flood storage to lessen the flood risk to the Portland metro area. The emptying of carryover water in the winter to increase spring flood storage would have unintended consequences on the Boise River ecosystem. The rapid filling of the reservoirs to meet irrigation needs after the threat of flooding is past would also have unintended consequences.

Predictable availability of storage water for irrigation could be decreased if management of the Boise River reservoirs is tied to snowpack and weather in the entire Columbia River basin. What would irrigators do? Look for ways to increase storage and predictability, and that could decrease or otherwise alter flows in the Boise River. What would the Bureau of Reclamation do if reservoirs are at risk of not filling in time for irrigation season (because of winter releases caused by high snowpack in the Cascades or somewhere else)? Reduce river flows to a trickle at a time when river ecosystems need spring freshets.

Confiscating space in Idaho's reservoirs threatens the ecological integrity of the Boise River and other Idaho rivers. The precepts of environmental justice dictate that the burden of flood risk reduction must fall on the Portland metro area, not the smaller upstream communities. There are many flood risk reduction strategies that the metro area can employ – the cheapest and longest lasting usually being moving valuable investments out of the floodplain.

Thank you for considering our comments, and please inform us of future opportunities to participate in this important process.

For the rivers,

Siz Paul

Liz Paul Boise River Campaign Coordinator