

“Promises made, Promises Broken”

*“Completion of Libby Dam will permanently remove over 41,000 acres of the Kootenai River Valley in the United States from agricultural, residential, logging and manufacturing uses. **About 13,000 acres of this total will be reserved for public recreation and access at Lake Koocanusa.** – Lake Koocanusa Final EIS 01/28/1972*

District Ranger, Eureka Ranger Station

949 US Highway 93N

Eureka, Mt 59917

Subject: The Douglas Hill Off Highway Vehicle Area and Campground Improvements Project

Dear Ranger Carbonari,

Thank you for the opportunity to comment on The Douglas Hill Off Highway Vehicle Area and Campground Improvements Project. I am starting my letter out with some history of Lake Koocanusa and its development.

I know many of you are familiar with the phrase ***“Promises made, Promises Broken”*** that is sometimes used in conjunction with the development of the Libby Dam and the other 3 dams that were built under the Columbia River Treaty.

I know you do not have a lot of free time, but I would encourage you to watch this video regarding the Columbia River Treaty History and the construction of the 4 Dams. Most of the footage is filmed on the Canadian side of the border, but it is still relevant to our side of Lake Koocanusa. The land sale “negotiation” process, forest clearing, construction, and building removal was nearly identical in both the US and Canada. **Columbia River Treaty History video** - <https://youtu.be/UCWbYl9RJbw>

A. Communities under Water

For the betterment of society, my family, AND HUNDREDS OF OTHERS, in the US and Canada, in the Kootenai River Valley lost their communities, homes, large ranches, or acreages on both sides of the border.

“Although the Libby Dam has prevented communities downstream from being flooded our communities upstream are still underwater”.

B. Libby Dam Project Facts

The Libby Dam project was initiated and constructed by the USACE (U.S. Army Corps of Engineers). At the completion of the project the land management and facilities were turned over to the USFS (U.S. Forest Service).

The following information is important from a recreational use standpoint because only half of the recreation areas were developed. The “*Preliminary Recreation Development Plan for the Libby Dam Project*” page 10 estimates, in 1965, the visitors to Lake Koocanusa for the year 2000 at 1.3 million. The 2007 USACE Lake Koocanusa fast facts estimated **actual usage** at 145,628 visitors from picnickers to hunters. The reality of the use is only 11% of the original estimated use, yet the current facilities are usually described as “over-used”. I would contribute the perceived over-use to the lack of facilities, the empty promises... Promises made, Promises Broken.

- *“The entire shoreline of Lake Koocanusa in the United States will be in public ownership assuring the perpetual availability of the resource for recreational use. The basic recreational uses of the lake will be different than the uses associated with a stream. Also, the size of the lake itself will provide recreational experiences not available at the small lakes found in this region.” - Lake Koocanusa Final EIS 01/28/1972*
- *“Recreational use in the project area will change from a river oriented pattern to a lake oriented pattern and will be increased by the project. Lake Koocanusa, as a recreation resource, will increase recreation demand and facilities are being provided to take care of the demand. The Forest Service plans for ultimate development of **twenty-two authorized recreation areas** ranging from primitive to commercial complexes. About 13,000 acres of public land will be available in the United States to provide recreation and public access at the project.” – Lake Koocanusa Final EIS 01/28/1972*
- *“The 22 recreation sites will be developed by the Forest Service under their continuing authority for recreational development at projects forming a lake on National Forest lands.” - Lake Koocanusa Final EIS 01/28/1972*
- *“Unlike most lakes in western Montana, the entire shoreline of Lake Koocanusa will be in public ownership assuring the perpetual availability of the resource for recreational use. Because of the greater number of people using the project area for recreational purposes, there will be some adverse secondary environmental effects. The proposed recreational areas will be designed to adequately accommodate the estimated users and minimize these secondary effects by such means as screening to reduce noise, providing adequate sanitary facilities and other design details”. -Lake Koocanusa Final EIS 01/28/1972*
- *“Business and civic interests, marina operators, commercial fishing guides, Montana Department of Fish, Wildlife and Parks, Kootenai National Forest, and other interests from communities around Lake Koocanusa voiced strong concern about the negative impacts of current operation of the reservoir on recreation, fisheries, and the local economy both within the reservoir and on the Kootenai River downstream. Residents of Libby and Eureka, Montana, and neighboring*

*communities in British Columbia **agreed to the construction of the project based on promises that it would become an important recreation resource.** They believe that Federal agencies have reneged on those promises by operating the project primarily for purposes other than recreation. **They point out that many of the recreation facilities that were planned on the lake have never been constructed.***" -Columbia River System Operations Review FEIS – November 1995

- *Low water elevations have frequently made many of the boating and swimming facilities unusable for long periods during peak recreation seasons. This is especially true in upper reaches of the lake in Canada. **Drawdowns also expose large mudflats in the vicinity of Eureka, which have resulted in a dust problem.*** -Columbia River System Operations Review FEIS – November 1995

C. Recreation Statistics

Because a 300-ft strip around the full pool level and most of the adjacent land will have National Forest status, **the Forest Service will have to provide all types of public recreation developments, offer additional services through special use and concessionaire developments, and provide access to the reservoir for public service developments on adjacent private lands.** -see page 10, *Recreation Area Plan Libby Reservoir-June 1965*

The Libby Dam project was projected to bring 1.3 MILLION users to the area, in the year 2000, to offset the loss of revenue from flooding of 41,000 acres of productive timber and farm lands (see page 10, *Recreation Area Plan Libby Reservoir-June 1965*). According to the Lake Level Report for Lake Koocanusa in 2006 there were 145,628 visits (see attached). The real numbers were 1/10 of the estimated use, 6 years later.

According to the Recreation Area Plan Libby Reservoir-June 1965(page 31), there were to be a minimum of 22 recreational sites developed for organized camping, picnicking, boat launching, and provisions for special use permits for Marinas and Resorts... I believe less than half of these promises came to fruition...

D. Dispersed Camping and Recreation Facilities in closing

Creating structured use patterns in the Douglas Hill area is a step in the right direction but restricting recreational use with the "structure" is wrong.

As you can see from the information provided at the beginning of this letter restricting recreational use was not the original intent of Lake Koocanusa. Because of the lack of promised facilities usage numbers are currently at use levels that are approximately 11% of what was predicted during the construction of the Libby Dam project. It's actually pretty insulting to the people whose families sacrificed their communities, homes, and homesteads...

The area referred to as “The Point” at Douglas Hill is a great place for locals and visitors to camp.

The Full pool elevation of Lake Koocanusa is 2459’. The majority of “The Point” is above 2450’. I have attached a spread sheet showing the dates and elevation of Lake Koocanusa for the past 30 years. This information was taken from USACE data on their website at <https://www.nwd-wc.usace.army.mil/dd/common/dataquery/www/#>.

In 14 of the past 30 years the lake level did not reach 2450’ where “The Point” camping starts. During the remaining 16 years there were very few days that more then 50% of “The Point” was covered with water.

I have also attached a Google Map View of “The Point” and the Peck Gulch recreation area. The Google Earth view of the point was taken on 07/24/2017. The Lake elevation the day the aerial was taken is 2448.43’.

As you can see from the aerial view there is a great opportunity to structure a wonderful recreation experience through development of a facility to include camping, swimming, and boating.

“The Point” is a great site for campers to bring boats because the boats tied along the east side of the point are protected from the waves and wind that come across the lake.

Although the area may be under water at times, any road improvements and campsites would seldom be under water. There could be 2 loops created for the lower and upper elevations of the point. (See attachment) The 2 loops could easily accommodate 30+ RV sites. This would create structure which would help alleviate user conflicts without eliminating users.

The creation of the 2 loops on the point might seem farfetched, but the Peck Gulch recreation area was built on a similar type of point. (See attachment)

I agree that OHV use near the private lands should be buffered, but the district needs to reconsider eliminating any opportunities for camping on “The Point” and in the OHV area. The residents of Lincoln County sacrificed 41,000 acres of prime timber and farmlands because they were promised abundant recreational opportunities. Less than half of the camping and boating facilities have been developed. Removing any dispersed camping opportunities would be in complete opposition to the original intent of the lake area.

To be consistent with the original intentions of Lake Koocanusa the Douglas Hill Dispersed Camping Area and the Douglas Hill OHV Area proposal needs to increase camping opportunities either through developed sites and infrastructure or with access to more dispersed camping areas.

“About 13,000 acres of this total will be reserved for public recreation and access at Lake Koocanusa”. – Lake Koocanusa Final EIS 01/28/1972

Please reach out to me via phone, email, or USPS.

Sincerely,

Josh Letcher
Lincoln County Commissioner

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The following links are some of the documents I referenced above:

-Lake Koocanusa Final EIS 01/28/1972

<https://usace.contentdm.oclc.org/digital/api/collection/p16021coll7/id/10891/download>

https://books.google.com/books?id=0rMjAQAAMAAJ&pg=RA2-SA38-PA14&lpg=RA2-SA38-PA14&dq=lake+koocanusa+reservoir+plan+USFS&source=bl&ots=whMd1a1TDz&sig=ACfU3U1Rt7lqIBU0WQNgPqx6JlpYTaYqVQ&hl=en&sa=X&ved=2ahUKEwi1v_rc-pLpAhUBNH0KHZraAJIQ6AEwAnoECAgQAQ#v=onepage&q=lake%20koocanusa%20reservoir%20plan%20USFS&f=false

https://www.nws.usace.army.mil/Portals/27/docs/environmental/resources/OlderEnvironmentalDocuments/UCEIS_AppE-Recreation-Final_EIS.pdf?ver=2012-08-09-165551-587

https://www.bpa.gov/efw/Analysis/NEPADocuments/nepa/System_Operation_Review/pdf/AppendixJ_Recreation.pdf