

PRESS RELEASE

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Federal Agencies, Tribes, States, Conservation and Fishing Organizations Urge Federal Agencies to Take a Hard Look Removal of the Four Lower Snake River Dams

PORTLAND, OR— In addition to nearly 400,000 individual citizen comments from across the United States, scores of entities in the region also submitted detailed public comment to three Northwest “Action Agencies,” Bonneville Power Administration, U.S. Army Corps of Engineers, and U.S. Bureau of Reclamation, as part of a court-ordered National Environmental Protection Act (NEPA) EIS Analysis.

The official comments, from federal agencies, Tribes, States, and nonprofit organizations, signal a powerful shift in the conversation around the Columbia-Snake Basin hydro-system, and the fate of four outdated federal dams on the lower Snake River. Comments encourage the Action Agencies to carefully, thoroughly and fairly consider the costs, benefits, opportunities and tradeoffs associated with removal of the four federal dams on the lower Snake River to protect and recover endangered wild salmon and steelhead, keep communities whole, and safeguard their Northwest way of life.

The comments echo U.S. District Court Judge Michael Simon’s ruling last May, when he rejected the federal government’s 2014 Salmon Plan for the Columbia-Snake River Basin based on violations of the Endangered Species Act and NEPA. This was the fifth Columbia-Snake federal salmon plan to be rejected by three judges in the last twenty years.

More than 20 years ago, Judge Marsh admonished that the Federal Columbia River Power System “cries out for a major overhaul.” Judge Redden, both formally in opinions and informally in letters to the parties, urged the relevant consulting and action agencies to consider breaching one or more of the four dams on the lower Snake River.

And most recently, Judge Simon said, “For more than 20 years, however, the federal agencies have ignored these admonishments and have continued to focus essentially on the same approach to saving the listed species—hydro-mitigation efforts that minimize the effect on hydropower generation operations with a predominant focus on habitat restoration. These efforts have already cost billions of dollars, yet they are failing. Many populations of the listed species continue to be in a perilous state.

“Although the Court is not predetermining any specific aspect of what a compliant NEPA analysis would look like in this case, it may well require consideration of the reasonable alternative of breaching, bypassing, or removing one or more of the four Lower Snake River Dams... It is doubtful the Action Agencies could demonstrate that breaching, bypassing, or removing one or more of the Snake River dams is not ‘reasonable’ under NEPA.”

Please find excerpts from selected comments, below.

The U.S. Environmental Protection Agency

“Of key importance in this context is the role of salmon as a provisioning species. Salmon produce highly valued food products harvested in various commercial, subsistence, and personal-use fisheries across the North Pacific. Salmon are also a principle focus of the spiritual and cultural lives of diverse native communities throughout the planning area.

“Salmon and steelhead also provide many ecosystem supporting services. Salmon are the principle food item of many terrestrial and marine species and a source of marine-derived nutrients to lakes and streams. They also act as watershed engineers that structure streambed habitats and alter sediment composition during spawning. We recommend that these services be acknowledged, accounted for using quantitative (where feasible) or qualitative means, and fully considered in decision making.

“We recommend that the EIS analyze the effects of current system operation on temperature regimes, and craft alternatives that will allow for the exploration of different dam configuration and operation scenarios and their effects on water temperature in the basin... We recommend that one of the alternatives consider the breaching or removal of all four dams on the lower Snake River coupled with cold water releases from Dworshak Reservoir.”

Read [full comments here](#).

Nez Perce Tribe

“The dams on the lower Snake River and the mainstem Columbia have had an enormous impact on salmon and steelhead, and as a result on the Nez Perce Tribe and its people... The Tribe's Reservation, and many of the Tribe's usual and accustomed fishing places, in addition to those on the mainstem Columbia, are above the eight dams on the Snake and Columbia River... The Tribe continues to believe that downstream—Hells Canyon, lower Snake River, and Columbia River—operational and structural improvements are what the fish need now to survive and recover.

“The Federal Columbia River Power System remains a system that ‘cries out’ for a new approach and for new thinking if wild Pacific salmon and steelhead, which have been in these waters since well before the arrival of homo sapiens, are to have any reasonable chance of surviving their encounter with modern man. Perhaps following the processes that Congress has established both in the National Environmental Policy Act and in the Endangered Species Act finally may illuminate a path that will bring these endangered and threatened species out of peril.

“An analysis that objectively and transparently takes the requisite ‘hard look’ at the environmental impacts of the distinct characteristics and impacts of the FCRPS projects, must consider the alternative of breaching the four lower Snake River dams. As NOAA Fisheries has previously acknowledged, ‘breaching the four lower Snake River dams would provide more certainty of long-term survival and recovery [of Snake River ESA-listed fish] than would other measures.’ 2000 BiOp at 9-5. The four lower Snake River dams do not provide flood protection and do not provide any meaningful amount of irrigation. These dams produce relatively little regional power, and feasible replacement options are available, or may already exist within the regional power system. Freight transport has declined as the combination of trucks and railways have become more efficient than trucks and barging.”

Read [full comments here](#).

State of Oregon

“This EIS should meaningfully consider a comprehensive list of aggressive alternatives to long-standing operations and configurations up to and including increased spill over current environmental standards, additional drawdown of reservoirs, and breaching of the four lowermost dams on the Snake River. In light of the highly precarious status of the listed species that migrate through the FCRPS and the decades-long history of FCRPS Biological Opinions that fail to comply with the Endangered Species Act, Oregon recommends that the Agencies evaluate alternatives against a standard that will avoid continued jeopardy and allow delisting and recovery of Columbia River salmon and steelhead ESUs. All alternatives should be evaluated in the context of climate change.”

Read [full comments here](#).

State of Washington

Washington State’s comments emphasize the need of “a ‘win-win’ alternative that builds on a Northwest way of life that includes healthy salmon runs, clean and affordable energy, strong farming communities with reliable water supply, and a vibrant economy...

“We suggest examination of the following themes in the NEPA alternatives analysis. We propose the following general alternatives:

1. Status quo: 2014 BiOp plus court-ordered spill in place since 2008;
2. Aggressive all-H restoration strategy: Focused on dam management to improve lifecycle survival, high value habitat restoration, conservation hatcheries and continued hatchery reforms, predation control, and continued harvest reforms to protect wild stocks;
3. Lower Snake River dam removal: Removing or breaching one or more of the lower Snake River dams; and
4. Aggressive restoration plus dam removal: Removal/breaching of one or more lower Snake River dam plus aggressive restoration strategy (alternatives 2 and 3, or key elements thereof, combined).”

Read [full comments here](#).

City of Lewiston

“The City of Lewiston, Idaho requests that the Federal Agencies (“FAs”) involved in updating the Columbia River System Operation EIS (“EIS”) evaluate the following questions and concerns in the EIS.

1. The City’s critical infrastructure such as the water treatment plant intake, sewer life station discharge and storm water pond and outfall system are all connected to the rivers. These facilities are designed to operate in the concert with the rivers at a specific point, elevation and grade. What mechanisms will the FA’s use to keep these critical infrastructure systems operational for the city if the dams are breached.
2. The area’s largest employer, Clearwater Paper, is also dependent on the river being at a specific location for their water intake and discharge. How will they be impacted?
3. The storm drainage ponds on the Snake and Clearwater Rivers, located north and west of Lewiston are now owned and operated by the Corps of Engineers. The southerly pond skims oil; two others filter sediment. How will the functional characteristics and management costs of the discharge change if the dams are breached? Will the water

quality characteristics of the discharge change and potentially impact the City's NPDES Permit?

4. There will the new high water mark be in relation to the government take line when the lakes were created? Who will own and manage the land uncovered? The City might be interested in taking ownership after clean-up of the site (toxins, garbage, car bodies, construction materials, etc).

Read [full comments here](#).

Seattle City Light

“City Light supports a comprehensive examination of a full range of alternatives, including scenarios that remove one or more of the dams on the Snake River, as directed in the District Court 2016 Opinion and Order. The evaluation of alternatives should be based on best available science, and to the extent practicable, include measurable outcomes. In addition to the benefits to anadromous fish populations and water quality, each alternative should be evaluated on its benefits and impacts on power production, carbon emissions, flood control, navigation, and other public uses. The analysis should assume that any generating capability lost as a consequence of implementing an alternative is not immediately replaced, but rather replaced when needed as a result of regional load growth. Furthermore, the analysis should prioritize replacement of energy output and peaking capabilities with a combination of energy conservation, renewable resources and demand response.

“City Light also advises that the EIS to incorporate adaptive mechanisms that enable operations to meet ecosystem-based function as new information becomes available or as conditions change. To ensure the long-term success of salmon recovery, the EIS must address the impacts of climate change. Existing and future climate research will identify the vulnerabilities of ESA-listed fish species to the impacts of climate change, such as altered hydrology and thermal regimes. Planning for climate change, including the development of climate adaptation measures should be incorporated into the alternatives to be evaluated.”

Read [full comments here](#).

Columbia Inter-Tribal Fish Commission

“Salmon are a tribal cultural resource that play an integral part of tribal religion, culture, and physical sustenance. For thousands of years, salmon shaped the lives of the people who have lived here since time immemorial. The cultures, intertribal interactions, fishing technologies, and very religions of the Pacific Northwest tribes were all impacted and influenced by salmon. These fish have been an important part of the economies of the region for thousands of years, from the ancient Indian trade routes to modern commercial fishing. Columbia Basin salmon also play an important role in the ecosystem of the region, returning ocean nutrients to the rivers and streams where they were born, feeding wildlife and even the forests with their bodies.

“To satisfy the district court, the EIS should consider a range of system operations and improvements with the goal of improving fish passage and maximizing system survival... Alternatives reviewed under the EIS should include those matters specifically directed by Judge Simon, including ‘consideration of the reasonable alternative of breaching, bypassing, or removing one or more of Lower Snake River Dams,’ as well as other structural modifications to again improve fish passage and system survival.”

Read [full comments here](#).

Pacific Fisheries Management Council

“These alternatives must be analyzed for their ability to contribute to the recovery of ESA-listed stocks and restore Columbia River salmon populations to harvestable levels that sustain sport, commercial, and tribal communities... The broad scope of the CRSOC also allows for consideration of actions that will improve the status of non-ESA-listed stocks and meet mitigation responsibilities, and actions that may benefit economic sectors such as sport and commercial fishing as well as salmon. On a river governed by numerous processes that are not always closely coordinated, the CRSOC is a rare opportunity for the whole region to consider creative and integrated solutions to long-running controversies. This is an opportunity to consider the true costs and benefits of a range of alternatives needed for the recovery of ESA-listed salmon on the Columbia River system and its fisheries amidst the changes confronting the region in the 21st Century.

“Alternatives analyzed should include, among other measures, steps to improve river flows and temperatures, increased spill at mainstem dams, and other altered dam operations to benefit juvenile survival. As strongly suggested by the recent court opinion, they should examine removal of the four lower Snake River dams.”

Read [full comments here](#).

Pacific Coast Federation of Fisherman’s Associations

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Read [full comments here](#).

Coastal Trollers Association

“The EIS must consider the effects of a changing climate on salmon recovery efforts. The impacts on returning adults of the unusual warm weather and water in the summer of 2015 were a demonstration of the vulnerability of salmon to climate change... Climate change mitigation should include: modeling the effects of removing the four lower Snake River dams on habitat for salmon.

“The salmon resource of the Columbia Basin has impacts far beyond the coasts of Washington and Oregon state... The scope of the economic analysis should include benefits in southeast Alaska and Oregon, as well as the Washington coast and in river fisheries.

“The breaching of the four lower Snake River Dams has the potential to provide significant population increases in all salmon and steelhead spawning in the Snake Basin... Commercial fisheries have been severely impacted by the loss of salmon resources due to habitat degradation and hydroelectric development in the Columbia and Snake Basins.

“Tax payers and BPA rate payers as well as Mid Columbia Utility Customers have dumped literal truckloads of dollar bills into salmon recovery. Never the less, 13 ESUs remain on the Endangered Species List. From a very simplistic view, recovered salmon populations are worth quite a bit more than the annual investment in recovery and mitigation since what is being spent today isn’t getting salmon populations back up to recovered levels.”

Read [full letter here](#).

Northwest Sportfishing Industry Association

“The dams on the Snake River have been shown to cause significant problems for the migration of salmon. It is very important that the EIS thoroughly evaluate the need to remove these dams as a means of achieving recovery of the ESA listed populations within the watershed.”

Read [full comments here](#).

Northwest Energy Coalition / Idaho Conservation League

“While the LSR dams provide substantive value to the FCRPS and the region, it has come at a major cost to fish and wildlife, especially anadromous fish survival and recovery in the Snake River Basin.

“But furthermore, the LSR dams do not provide optimal economic value to the electric power system given their electric output capabilities and limitations (even aside from existing fish passage constraints). They are run-of-river projects with limited pondage, and as such have a seasonal energy shape that is not well fitted to regional electric demand structure, have limited capability for capacity, reserves and ancillary services, and are not effectively able to provide renewable energy balancing.

“Indeed, as a result, as prices have declined in the western power markets, it is likely that the marginal economic return of the LSR dams has also fallen since their seasonal peak coincides with the hydrosystem runoff peak and relatively low spring and early summer demand both in the Northwest and California. Furthermore, these effects may be increased by incremental shift of the Snake River hydrograph with the further onset of climate change.

“Consequently, we believe it is possible that some alternative portfolios for partial or full LSR replacement may provide equivalent or better overall system value than continued operation of the LSR dams.”

Read [full comments here](#).

The Orca Salmon Alliance

“Some of the best remaining intact salmon habitat lies in the Snake River watershed, a tributary of the Columbia that extends to the high-elevation mountains of Idaho. To migrate to and from this habitat, salmon must travel hundreds of miles and successfully pass eight major dams — four on the lower Columbia River and four on the lower Snake River.

“Numerous scientific studies undertaken over the past twenty years have concluded that one of the most effective actions that could be taken to recover ESA-listed salmon populations in the

Columbia Basin is to restore access to this habitat. The science strongly supports removing the lower Snake River dams — Ice Harbor, Lower Monumental, Little Goose, and Lower Granite — in order to provide the greatest opportunity to recover the populations of Snake River spring/ summer Chinook salmon that once comprised the bulk of Chinook production in the Columbia Basin. We now know that Southern Resident killer whales rely upon these salmon stocks, and increasing these Chinook populations in particular would deliver tremendous nutritional benefits to these endangered orcas; these Chinook are known to be relatively large and have a high fat content necessary for their particularly long, arduous journey to the Snake River system.

“In 2009, scientists with the Western Division of the American Fisheries Society stated in a letter to Dr. Jane Lubchenco, former Administrator of NOAA, that ‘[i]n contrast to the uncertainty of success from the removal of hydro projects in other portions of the basin, the benefits to Snake River stock recovery would be assured with the removal of the lower Snake River dams.’”

“We urge the Action Agencies to consider alternatives to improve the full life-cycle survival of salmon in the Columbia River Basin, including the removal of the four lower dams on the Snake River, and replacement with zero-carbon alternatives. Science strongly supports Snake River dam removal as a critical component of a comprehensive, ecosystem-based recovery strategy aimed at recovering threatened and endangered salmon populations and the Southern Resident killer whales that depend on abundant salmon.”

Read the [full letter here](#).

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Please visit Save Our Wild Salmon's [website](#) to read other selected comments in their entirety.