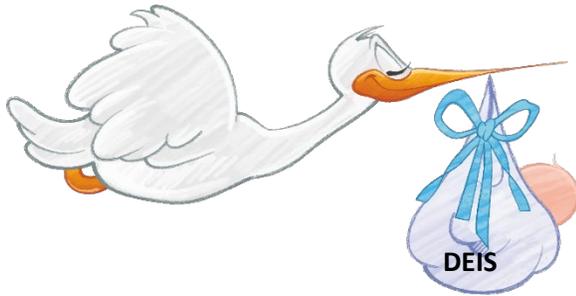


A Draft EIS Is on Its Way



Contents

Background1
 Things to Look For in the DEIS2
 Ultimate Outcome?.....2

The Columbia River System Operations Draft Environmental Impact Statement (CRSO DEIS) is scheduled to be sent to the Federal Register on 2/28/20. When published by the Federal Register—also on 2/28/20—the clock will begin on the 45-day public comment process.

The DEIS will be around **5,000 pages in length** and include a “Preferred Alternative” for Columbia River system operations. (Thank goodness for executive summaries!)

Background

A National Environmental Policy Act (NEPA) review was ordered by Federal District Court Judge Michael Simon in 2016 to specifically

study the breaching of the four lower Snake River dams (LSRD).

The NEPA process requires a holistic examination of the environmental, fish & wildlife, and socioeconomic outcomes of a proposed action—in this case the operation of the Federal Columbia River Power System.

The development of an EIS includes a “No Action” alternative. The No Action alternative represents no change from the operations, maintenance, and configuration of the Columbia River System in 2016. It also includes four **Multiple Objective (MO) alternatives**.

Compared to the “No Action” alternative...

- MO1 = More spill***
- MO2 = More power generation**
- MO3 = Breaching the four LSRD**
- MO4 = Maximum spill at all lower Columbia & lower Snake River dams**

** (“Spill” is water that goes over the dam instead of through the dam’s powerhouse.)*

It is possible that the Preferred Alternative will be a combination of the alternatives listed above.

The following website provides good information on the CRSO EIS process and timeline, as well as more details on the MO alternatives.

<https://www.nwd.usace.army.mil/CRSO/>

Things to Look For in the DEIS

- Regional energy forecasts are showing that the Northwest is [at risk for a power shortage or even region-wide blackouts](#), as we move away from carbon-emitting resources, like coal plants. Losing the LSRD would greatly increase the risk of blackouts.
- One analysis showed that replacing the energy capabilities of the LSRD would cost close to [\\$1 billion annually](#). That doesn't include the cost of replacing the other capabilities of the LSRD (i.e., irrigation/barging). The loss of the LSRD would represent tremendous hardship to vulnerable communities across the Northwest.
- The DEIS used two different models to examine the impact of hydroelectric operations on salmon:
 - The Comparative Survival Study (CSS) model is operated by the Fish Passage Center. Its assumptions are based on the controversial theory that juvenile salmon experience wear & tear as they make their way past dam powerhouses or through fish bypass systems. This hypothesized wear & tear is assumed to reduce juvenile salmon survival in the ocean. The theory is referred to as "delayed mortality".
 - The COMPASS model is operated by NOAA Fisheries Science Center. This model does not assign a value to delayed mortality, but it recognizes that high spill levels cause unsafe amounts of total dissolved gasses in

the river, which can kill fish through "gas bubble trauma".

Ultimate Outcome?

Finalizing the EIS

The federal Action Agencies (The US Army Corps of Engineers, the Bonneville Power Administration, and the US Bureau of Reclamation) will consider the public comments and adjust their conclusions as necessary.

The comments submitted during the 45-day comment period will be included in the final EIS document, which will be released in July 2020 (likely early-July).

Each of the Action Agencies will issue their respective Records of Decision on 9/30/2020.

After the NEPA Process—The Courtroom?

Several groups are working to avoid a litigious outcome. It is possible that one or more plaintiffs will return to court to litigate.

A judge cannot order dam breaching but can order other operational changes.

Any appeals of the judge's potential ruling would first go to the Ninth Circuit Court of Appeals. If the hypothetical Ninth Circuit Court case were to be appealed, then the case would go to the Supreme Court.