October 1, 2021

Secretary Deb Haaland
U.S. Department of Interior
Washington, D.C. 20240

Secretary Jennifer Granholm
U.S. Department of Energy
Washington, D.C. 20002

Secretary Gina Raimondo
U.S. Department of Commerce
Washington, D.C. 20530

Secretary Lloyd Austin
U.S. Department of Defense
Washington, D.C. 20301

Brenda Mallory, Chair
Council on Environmental Quality
Washington, D.C. 20530

Dear Secretaries Haaland, Granholm, Raimondo, Austin and Chair Mallory:

Recently, a subset of special interests narrowly-focused on salmon issues in the Pacific Northwest have communicated to you about the operation of the federal hydropower system in our region.

While we agree on the importance of the health of our salmon populations for the environment, economy, and cultures of our region, we offer a holistic, collaborative approach that is grounded in science and that also considers the priorities of clean energy to mitigate climate change and grid reliability to keep the lights on. Our proposal upholds federal obligations and responsibilities and builds on science-based policy instead of advancing divisive politics.

Rather than abandon the Columbia River System Operations Environmental Impact Statement (CRSO EIS) and accompanying salmon management plans, as others have suggested, we strongly urge you to continue to implement and defend these important science-based plans as key means for the Biden Administration to both help salmon and fight climate change.

The 2020 CRSO EIS: A Scientific Assessment, Not A Partisan Plan

The 2020 CRSO EIS is the result of decades of collaborative, science-based salmon recovery work conducted by public servants and professional experts with input from diverse stakeholders, spanning multiple presidential administrations, Republican and Democratic alike. The CRSO EIS cannot, by any credible means, be fairly labeled a "Trump plan."

Long before the CRSO EIS was completed in July of last year, organizations that believe dam removal is the only solution for salmon recovery were preparing to continue their litigation against the federal government without waiting for the scientific data and analysis.

The CRSO EIS is the culmination of decades of collaborative work by the U.S. Bureau of Reclamation (USBR), the U.S. Army Corps of Engineers (USACE), the Bonneville Power

Administration (BPA) through the Department of Energy, National Oceanic and Atmospheric Administration (NOAA) Fisheries, with consultation and input by Pacific Northwest Tribes and state fisheries agencies.

The operational partnerships between these organizations, the investments they have made on behalf of rate payers in fish and the environment, and the growth in scientific knowledge have transcended four Presidential Administrations, starting with the Federal Columbia River Power System Biological Opinion in 2000.

The anti-dam special interests attempted to package all of these multi-decade fish and environmental partnerships and actions as a "Trump Administration" plan, which ignores these historic efforts from both sides of the aisle. The reality is that designing, implementing, and evaluating the efficacy of a large and complex mitigation plan takes time to accomplish and will require continued bipartisan commitment and compromise to keep moving forward.

The Primary Threat to Salmon is Climate Change

While past Biological Opinions have been invalidated by federal judges, there is strong reason to believe the 2020 EIS and Biological Opinion should reach a different outcome. Important, recent peer-reviewed research has documented Chinook salmon returns up and down the Pacific Coast of North America—from Northern California to Southeast Alaska—have been dwindling for the past 50 years, *whether these salmon originate from rivers with dams or free-flowing rivers.*[1]

Chinook salmon returns in the Snake River, it turns out, are not at all anomalous or atypical and are very similar to returns in the Puget Sound and even pristine, free-flowing Alaskan rivers. This finding was confirmed by the Independent Scientific Advisory Board (ISAB)[2], which is the region's salmon science equivalent to the National Academies of Sciences, Engineering, and Medicine.

Importantly, this conclusion is highly consistent with a 2019 report from the United Nations' Intergovernmental Panel on Climate Change, which found that a 50-year period of unabated ocean warming is to blame for the decline of marine fish populations across the globe.[3]

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[1] Welch, David Warren, et al. "A Synthesis of the Coast-Wide Decline in Survival of West Coast Chinook Salmon (Oncorhynchus Tshawytscha, Salmonidae)." Fish and Fisheries, vol. 22, no. 1, 2020, pp. 194–211., doi:10.1111/faf.12514. https://onlinelibrary.wiley.com/doi/10.1111/faf.12514

[2] Review of the Coast-Wide Analysis of Chinook Salmon Smolt to Adult Returns (SARs) by Welch et al. Independent Scientific Advisory Board, June 29, 2021. ISAB 2021-3 ReviewOfWelchEtAl2020CoastWideSARs_29June.pdf

[3] IPCC, 2019: Summary for Policymakers. In: IPCC Special Report on the Ocean and Cryosphere in a Changing Climate[H.-O. Pörtner, D.C. Roberts, V. Masson-Delmotte, P. Zhai, M. Tignor, E. Poloczanska, K. Mintenbeck, A. Alegría, M. Nicolai, A. Okem, J. Petzold, B. Rama, N.M. Weyer (eds.)]. In press. https://www.ipcc.ch/srocc/chapter/summary-for-policymakers/

Similarly, a 2021 peer-reviewed study by NOAA Fisheries Science Center researchers found *ocean warming is the primary threat to Chinook salmon survival*. It concluded Pacific Northwest Chinook populations may become functionally extinct within 60 years if the Pacific Ocean continues to warm at its current rate.[4]

Unclear Connection Between Salmon Health and Dam Removal

Special interests focused on the narrowest view of Columbia Basin salmon recovery – Snake River dam breaching – lack scientific evidence to support their demands. There is no evidence that "delayed mortality," a key theory for dam removal, can be scientifically validated. The ISAB, in a 2007 report on delayed mortality, concluded that this theoretical phenomenon cannot be scientifically proven because there are too many dynamic variables in the ocean environment.[5]

Additionally, the salmon of greatest concern, the spring/summer Chinook, returned to Lower Granite Dam at a 17% increase over 2020 and a 50% increase over 2019. While this is no reason to celebrate, given the relatively low baseline, it is indicative that panic-measures, such as dam breaching, are not requisites to improve salmon population health.

Finally, it should be noted that nine of the thirteen salmon runs which are the focus of the CRSO EIS and accompanying litigation are not even found on the Snake River. Clearly, there are many other factors impacting fish in our Basin, and on the U.S. and Canadian west coasts. The continued special interest focus on four primarily run-of-river dams that already offer successful fish passage is an example of misplaced attention and resources.

Dams Provide Public Safety and Energy Equity

The lower Snake River dams are part of a larger multi-purpose system that includes power generation, irrigation, transportation, recreation, and flood control. This fact is important to recognize, because government is responsible for protecting the safety and property of its citizens.

This summer, in addition to historic and devasting wildfires, hundreds of people across the Pacific Northwest died due to record-shattering temperatures driven by climate change. [6]

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[4] Crozier, Lisa G., et al. "Climate Change Threatens Chinook Salmon throughout Their Life Cycle." Nature News, Nature Publishing Group, 18 Feb. 2021, www.nature.com/articles/s42003-021-01734-w

[5] Latent Mortality Report. Independent Scientific Advisory Board, 11 June 2007, www.nwcouncil.org/sites/default/files/isab2007_1.pdf

[6] Popovich, Nadja, and Winston Choi-schagrin. "Hidden Toll of the Northwest Heat Wave: Hundreds of Extra Deaths." The New York Times, The New York Times, 11 Aug. 2021, www.nytimes.com/interactive/2021/08/11/climate/deaths-pacific-northwest-heat-wave.html?searchResultPosition=1

The results would have been even more deadly if not for a robust electric grid powered by our region's clean and dependable hydropower system. BPA, in a press release, indicated that Ice Harbor Dam—one of the lower Snake River dams—was critical in providing a local source of power to the Tri-Cities area of Eastern Washington state during the heat dome event.[7]

This rapidly growing, diverse area, with fully one-third of its residents identifying as Hispanic, would likely have experienced widespread rolling blackouts without Ice Harbor Dam's generation, according to the BPA statement.

Hydropower, as a renewable, clean, and reliable energy source, also provides the backbone and support for regional efforts to decarbonize power, electrify transportation, integrate wind and solar energy, and ensure that vulnerable communities have access to low-cost power.

The lower Snake River dams alone provide roughly 1000 average MegaWatts of zero-carbon electricity and can provide peaking power of 2500 MegaWatts for a period of five consecutive days under typical winter conditions.[8] In other words, they can affordably and cleanly power a city the size of Seattle and provide critical capacity to protect vulnerable communities during extreme weather events.

Hydropower Fights Climate Change

The Biden Administration has established important, aggressive grid decarbonization goals for the nation, with a 100% clean energy goal by 2035. Separately, the Washington and Oregon legislatures have established clean energy targets that depend on hydropower to deliver in all these categories. Removing the lower Snake River dams and setting precedent for the removal of other productive hydropower dams will take our region in the wrong direction.

We do not yet have sufficient renewable energy to make up for the loss of four significant hydro projects. Instead, we are in a race against time to further decarbonize our energy mix to fight climate change. 35% of the Pacific Northwest's electric generation is still fossil-fueled. To meet the Biden Administration's 2035 target, we need to replace these resources with clean power and add even more clean energy to responsibly electrify our transportation system and buildings. Hydropower is a key asset in our doing our part in our region to support national and international goals to fight climate change.

It should also be noted that dam breaching would end safe, low-emission marine freight transportation on the lower Snake River and likely impact the existence of barging on the rest of

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[7] "Lower Snake River dams help region power through recent heatwave." BPA Press Release, July 22, 2021, https://www.bpa.gov/news/newsroom/releases/Documents/20210722-PR-10- 21-Lower-Snake-River-dams-help-region-power-through-recent-heatwave.pdf

[8] BPA, USACE, USBR, 2020: Columbia River Systems Operations Final Environmental Impact Statement. https://www.nwd.usace.army.mil/CRSO/Final-EIS/#top

the Columbia Snake River System. Over 3.9 million metric tons of U.S. goods moved on the Snake River in 2019. Just over 60% of the cargo that moves on the Snake River is high quality U.S. wheat grown in our region. In fact, nearly 10% of all U.S. wheat exports travel by barge on the Snake River each year. The remaining 40% of the cargoes on the Snake are fuel products, fertilizers, wood products, and large industrial components like wind turbine parts and other project cargo.

Importantly, over 39,000 rail cars or over 150,000 semi-trucks would be needed to move the cargo that went by barge in 2019 -- assuming that many trucks, drivers, locomotives, and rail cars could be sourced, and highways and rail lines through the sensitive airshed of the Columbia River Gorge could accommodate the additional traffic. The impact to the environment cannot be overstated.

Dam breaching would increase carbon and other greenhouse gas emissions by moving cargo from barge to less-efficient surface modes like rail and truck. Shifting cargo from Snake River barging to truck and rail will result in significant annual increases in emissions, as follows: over 860,000 tons of CO2, 306.5 tons of NOx, 7.5 tons of PM, 69.7 tons of CO, and 7 tons of VOC. Barging also has the best safety record of all cargo transportation modes, with fewer injuries and fatalities when compared to rail and trucking.

Conclusion

We fully recognize and support the federal government's and hydropower operators' shared responsibility for mitigating detrimental impacts to salmon from hydropower system operations. That is why we support additional funding for mitigation efforts such as advanced turbines, spillway upgrades, and safe salmon transport, as well as environmental funding, including culvert removal, habitat restoration, riparian support, and predation reduction efforts.

Sustained efforts and investments like these have made a significant difference in the in-river survival of salmon in our region. As an example, juvenile salmon pass each of the four lower Snake River dams with a 97% survival rate. As a result, the overall downstream survival rate of Columbia-Snake River smolts is similar to that of a free-flowing river.[9]

However, research shows salmon, like all species, including humanity, face an existential threat from climate change. For salmon, this threat is most pronounced in the ocean. Removing existing zero-carbon hydropower generation is clearly a step in the wrong direction.

Sincerely,

[9] Welch, D. W., Rechisky, E. L., Melnychuk, M. C., Porter, A. D., Walters, C. J., Clements, S., . . . Schreck, C. (n.d.). Survival of Migrating Salmon Smolts in Large Rivers With and Without Dams. Retrieved from https://journals.plos.org/plosbiology/article?id=10.1371/journal.pbio.0060265

Organization Name	Representative
Almota Elevator Company	Daniel Hart, Manager Colfax, Washington
American Waterways Operators	Jennifer A. Carpenter, President, CEO Arlington, Virginia
Benton PUD	Rick Dunn, General Manager Kennewick, Washington
Benton Rural Electric Association	Mike Bradshaw, General Manager Prosser, Washington
Big Bend Electric Cooperative	Yvette Armstrong, General Manager Ritzville, Washington
Blachly-Lane Electric	Greg Gardner, General Manager Eugene, Oregon
Central Electric Cooperative	Dave Markham, General Manager Redmond, Oregon
Chelan County PUD	Steve Wright, General Manager Wenatchee, Washington
Clatskanie PUD	Marc Farmer, General Manager Clatskanie, Oregon
Clearwater Power	Dave Hagen, General Manager Lewiston, Idaho
Columbia River Steamship Operators' Association	Kate Mickelson, Executive Director Portland, Oregon
Columbia Rural Electric Association	Scott Peters, General Manager Walla Walla, Washington
Consumers Power, Inc	Roman Gillen, General Manager Philomath, Oregon
Douglas Electric Cooperative	Keith Brooks, General Manager Roseburg, Oregon
Emerald PUD	Scott Coe, General Manager Eugene, Oregon

Fall River Rural Electric Cooperative	Bryan Case, General Manager Ashton, Idaho
Flathead Electric Cooperative	Mark Johnson, General Manager Kalispell, Montana
Franklin PUD	Scott Rhees, General Manager Pasco, Washington
Grant PUD	Kevin Nordt, General Manager Ephrata, Washington
Grays Harbor PUD #1	Schuyler Burkhart, General Manager Aberdeen, Washington
Harney Electric Cooperative	Fred Flippence, General Manager Hines, Oregon
Hyak Tongue Point LLC, Hyak Maritime LLC	Bob Dorn, CEO Astoria, Oregon
IBEW Local 77	Rex Habner, Business Manager/Financial Secretary Sequim, Washington Brian Gray, Assistant Business Manager Kennewick, Washington
Idaho Consumer-Owned Utilities Association	Will Hart, Executive Director Boise, Idaho
Idaho County Light & Power	Max Beach, General Manager Grangeville, Idaho
Idaho Falls Power	Bear Prairie, General Manager Idaho Falls, Idaho
Inland Power & Light	Jasen Bronec, General Manager Spokane, Washington
Lakeview Light and Power	John DeVore, General Manager Lakewood, Washington
Lewis-Clark Terminal	Scott Zuger, General Manager Lewiston, Idaho
Lincoln Electric Cooperative	Telly Stanger, General Manager Eureka, Montana

Mason 3 PUD	Annette Creekpaum, General Manager Shelton, Washington
Midstate Electric Cooperative	James Anderson, General Manager La Pine, Oregon
Modern Electric Water Company	Joe Morgan, General Manager Spokane Valley, Washington
Montana Electric Cooperatives Association	Gary Wiens, Executive Director Great Falls, Montana
Northern Wasco PUD	Roger Kline, General Manager The Dalles, Oregon
Northwest Grain Growers	Chris Peha, CEO Walla Walla, Washington
Northwest Public Power Association	Scott Corwin, Executive Director Portland, Oregon
Northwest Requirements Utilities	John Francisco, Executive Director Portland, Oregon
Northwest RiverPartners	Kurt Miller, Executive Director Vancouver, Washington
Oregon Municipal Electric Utilities Association	Jennifer Joly, Executive Director Salem, Oregon
Oregon Rural Electric Cooperative Association	Ted Case, Executive Director Wilsonville, Oregon
Pacific Northwest Waterways Association	Kristin Meira, Executive Director Portland, Oregon
PNGC Power	Roger Gray, CEO Portland, Oregon
Port of Benton	Diahann Howard, Executive Director Richland, Washington
Port of Clarkston	Wanda Keefer, Port Manager Clarkston, Washington
Port of Lewiston	David Doeringsfeld, Port Manager Lewiston, Idaho

Port of Pasco	Randy Hayden, Executive Director Pasco, Washington
Port of Whitman County	Joe Poire, Executive Director Colfax, Washington
Public Power Council	Scott Simms, Executive Director Hood River, Oregon
PUD No. 2 of Pacific County	Jason Dunsmoor, General Manager Raymond, Washington
Raft River Rural Electric Cooperative	Chad Black, General Manager Malta, Idaho
Salem Electric Cooperative	Tony Schacher, General Manager Salem, Oregon
Shaver Transportation	Steve Shaver, President Portland, Oregon
Springfield Utility Board	Jeff Nelson, General Manager Springfield, Oregon
Temco	Tom Rodman, Terminal Manager Kalama, Washington
Tidewater	Todd Bush, President, CEO Vancouver, Washington
Umatilla Electric Cooperative	Robert Echenrode, General Manager Umatilla, Oregon
Wasco Electric Cooperative	Ned Ratterman, General Manager The Dalles, Oregon
Washington Grain Commission	Glen Squires, CEO Spokane, Washington
Washington Public Utility Districts Association	George Caan, Executive Director Olympia, Washington
Washington Rural Electric Cooperative Association	Kent Lopez, Executive Director Olympia, Washington
Washington State Potato Commission	Matt Harris, Executive Director Spokane, Washington

Western MT G&T	Joe Lukas, General Manager Ennis, Montana
Yakima Tieton Irrigation District	Rick Dieker, Secretary-Manager Yakima, Washington