

***American Rivers ♦ Association of Northwest Steelheaders
Coastal Trollers Association ♦ Defenders of Wildlife
Endangered Species Coalition ♦ Friends of the Clearwater
Idaho Rivers United ♦ Institute for Fisheries Research
Natural Resources Defense Council ♦ Northwest Guides and Anglers Association
Northwest Sportfishing Industry Association ♦ Oceana
Orca Network ♦ Pacific Coast Federation of Fishermen's Associations
Save Our wild Salmon ♦ Sierra Club ♦ Snake River Waterkeeper
Spokane Chapter of Trout Unlimited ♦ Whale Dolphin Conservation
Wild Steelhead Coalition***

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Northwest Power and Conservation Council
851 SW 6th Avenue, Suite 1100
Portland, OR 97204-1348

Dear Council members:

The undersigned groups appreciate the many months of hard work Council members and staff have devoted to producing the draft 7th Power Plan and appreciate the opportunity to provide the following joint comments. While we are generally encouraged by the Draft Plan's direction on energy policy, we are very concerned with its treatment of the Columbia Basin's struggling fish and wildlife populations.

Our diverse organizations have hundreds of thousands of members in the Northwest and across the nation. We represent a range of important Pacific Northwest interests, including conservation, outdoor recreation, sport and commercial fishing, clean energy and business.

Abundant, self-sustaining populations of wild Columbia-Snake Basin salmon and steelhead are culturally, ecologically and economically vital to our region. Salmon and steelhead are central to many Northwest cultures. They support local jobs, businesses and communities and are essential to the welfare of other highly valued fish and wildlife populations.

But today, many Columbia Basin wild fish populations face extinction; effective restoration programs are needed now more than ever. The Northwest must design, adopt and implement effective and durable strategies that:

- Develop the built infrastructure needed to support increasingly clean, carbon-free and salmon-friendly energy; and

- Restore and protect the natural infrastructure endangered wild salmon need to survive and recover, including healthy rivers, connected habitats, resilient watersheds, etc.

The Northwest Power and Conservation Council is charged by Congress to strike the proper balance and provide equitable treatment for energy and wildlife in the allocation of critical Columbia Basin resources.

Our recommendations on energy and on fish and wildlife follow.

ON ENERGY:

The draft 7th Plan's proposed clean energy priorities and programs for the five-year "action plan" period and clean energy trajectory established for the next two decades set a decent starting point, over all.

Specifically, we support the draft plan's:

- Prescription to develop 4,500 average megawatts of energy efficiency to meet load growth over the next 20 years. We urge the Council to consider that number a minimum rather than a maximum.
- Focus on robust demand response programs and urge the Council to include specific targets in the final 7th Plan.
- Proposal to assure low-income families' inclusion in energy efficiency programs. That is right, just, necessary and cost-effective for all electric bill payers in the region.

ON FISH AND WILDLIFE:

We have grave concerns about the draft plan's approach to fish and wildlife. We are disappointed with the failure to include an analysis of the costs -- and *benefits* -- of replacing the four lower Snake River dams' energy production with clean, affordable and carbon-free resources.

The Council has done this type of analysis before. In fact, an appendix to the Council's 6th Plan modeled the affordability of replacing the energy from the four lower Snake River dams. Early this year, the Council included lower Snake River dam removal/energy replacement in the potential scenarios to be modeled for the 7th Plan. Despite many legal, scientific, economic and climate developments that make dam removal an ever more reasonable option, the Council chose not to pursue this scenario analysis for the 7th Plan. This decision is a major disappointment and one that does a disservice to our region's taxpayers and utility bill payers.

Here are just four specific circumstances that demonstrate the necessity and propriety of doing this analysis today.

1. This past summer, low flows and high ambient temperatures heated the water in lower Columbia and Snake river reservoirs, killing at least 250,000 adult salmon and other fish species. Just 1% of the still critically endangered Snake River sockeye salmon that entered the Columbia River in 2015 successfully reached their spawning gravels in central Idaho. The other 99% were killed by the overheated lower Columbia and Snake river reservoirs.

High numbers of young salmon also were killed by the high temperatures. The *Columbia Basin Bulletin*, reporting on a preliminary analysis by NOAA, described juvenile salmon's spring-summer 2015 out-migration as "dismal." Snake River smolts were hit especially hard.

Climate change will undoubtedly make such warming episodes more frequent, more intense and more long-lasting. Without major short- and long-term changes in dam management and river operations in the Columbia Basin, it is virtually impossible to envision a path away from extinction and toward salmon abundance.

Scientific consensus is solidifying, abetted by mounting real-world experience revealing the tremendous benefits of removing dams and restoring rivers to recover endangered salmon and steelhead. Even the federal government's own year-2000 Columbia Basin Biological Opinion sees lower Snake River dam removal as perhaps our "single most beneficial" Columbia Basin salmon restoration option.

2. Evidence is mounting that the cost of retaining the four lower Snake River dams is rising dramatically while the value of their services declines. Recently updated analyses by James Waddell, former Army Corps of Engineers Project Manager, for example, demonstrate how the dams' costs today exceed their benefits – and show how this gap will grow in the years ahead.

In addition, two recent studies find that replacing the energy produced by the lower Snake River dams is more than affordable. *NW Energy Coalition* recently completed a new study: [*Restoring wild salmon: Power system costs and benefits of lower Snake River dam removal*](#). This conservative analysis finds that replacing the lower Snake dams' energy generation and systemic capacity benefits with clean, carbon-free, salmon-friendly resources would cost the average Northwest household just \$1 per month. Another study produced by *Rocky Mountain Econometrics*, [*Lower Snake River Alternative Power Costs*](#), calculates that dam removal would have virtually no effect on the average monthly Northwest energy bill.

These and other reports conducted in the last 18 months not only raise troubling questions about the overall value of these dams, but also show that reliable, feasible and cost-effective alternatives exist that can replace their services.

3. Southern Resident Killer Whales (orcas) were listed under the Endangered Species Act in 2005. Their decline is largely traced to nutritional stress from inadequate amounts of their primary prey: chinook salmon. These whales hunt at the mouth of the Columbia, especially in late winter and early spring as large, fatty spring chinook gather there before entering the river.

The Columbia Basin's size, historic productivity and high restoration potential makes it our very best opportunity for rebuilding chinook populations sufficient for SRKW's survival and recovery. The Snake River Basin once produced about half of the basin's spring chinook. A freely flowing lower Snake River would restore productive access for Snake River spring/summer chinook (and other populations) and significantly boost annual adult returns of spring chinook, benefiting struggling SRKWs, other fish and wildlife populations and, of course, Tribal and non-tribal fishers.

4. Wild salmon and steelhead in the Columbia-Snake River Basin remain at grave risk of extinction today, despite more than two decades of effort and more than \$13 billion spent – not all of it wisely. The current status quo approach is a proven failure. With each passing year, dam removal and a free-flowing lower Snake River become more attractive, more necessary, more cost effective and more beneficial to the economy, ecology and culture of the region.

For these reasons and more, we strongly urge the Council to update and expand its earlier lower Snake River dam removal/energy replacement analysis as an addendum to the 7th Plan. The analysis should build upon the study appended to the 6th Power Plan by incorporating the real operations and management cost savings from removing the dams.

A meaningful analysis will require obtaining accurate, verifiable information from Bonneville Power Administration and the U.S. Army Corps of Engineers on actual and anticipated costs to operate, maintain and rehabilitate the lower Snake River dams over the next 20 years. It is essential that this data be complete, publicly available and critically reviewed.

Because filling these critical information gaps will require some time, we ask the Council to complete the addendum described above in the first quarter of 2016.

An accurate Council assessment of the costs to replace the energy from these four dams will be extremely valuable to regional and national policymakers and the families, businesses and communities they represent.

Thank you,

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