

*American Rivers ♦ American Whitewater ♦ Association of Northwest Steelheaders
Audubon Society of Portland ♦ Audubon Society of Lincoln City ♦ Backbone Campaign
Coastal Trollers Association ♦ Columbia Riverkeeper ♦ Communities for a Healthy Bay
Defenders of Wildlife ♦ Earthjustice ♦ Earth Ministry/Washington Interfaith Power and Light
Endangered Species Coalition ♦ Friends of Grays Harbor ♦ Friends of the San Juans
Grays Harbor Audubon Society ♦ Idaho Conservation League
Idaho Outfitters & Guides Association ♦ Idaho Rivers United ♦ Idaho Wildlife Federation
Institute for Fisheries Resources ♦ Kalmiopsis Audubon Society
National Parks Conservation Association ♦ Natural Resources Defense Council
National Wildlife Federation ♦ Northwest Guides and Anglers
Northwest Sportfishing Industry Association ♦ NW Energy Coalition
Pacific Coast Federation of Fishermen's Associations ♦ Olympic Forest Coalition
Rivers Without Borders ♦ Salem Audubon Society
Sawtooth Interpretive and Historical Association ♦ Save Our wild Salmon Coalition
Snake River Savers ♦ Spokane Riverkeeper ♦ Solutionary Rail ♦ The Natural History Museum
Twin Harbors Waterkeeper ♦ Washington Wild ♦ Washington Wildlife Federation ♦ Wild Orca
Whale Dolphin Conservation ♦ Whale Scout ♦ Whidbey Environmental Action Network
Wild Steelhead Coalition*

July 11, 2022

Jim Kramer
Kramer Consulting, Inc.
6539 57th Ave. S.
Seattle, WA 98118

Mr. Kramer,

Please accept these comments on behalf of the *Save Our wild Salmon Coalition (SOS)* and the member and allied organizations signing below. SOS is a coalition of Northwest and national conservation organizations, recreational and commercial fishing associations, clean energy and orca advocates, businesses and citizens committed to restoring abundant, self-sustaining fishable populations of salmon and steelhead to the Columbia-Snake River Basin and healthy populations of salmon-dependent Southern Resident orcas, for the benefit of people and ecosystems.

We appreciate the opportunity to comment on the *Lower Snake River Dams: Benefit Replacement Draft Report*. We want to begin by acknowledging the valuable and impressive work you and your associates have done to bring this synthesis and analysis together for the information of Sen. Murray and Gov. Inslee, and Northwest Tribes, stakeholders and the concerned public. Thank you.

Multiple members of our coalition have, or will, submit their own detailed comments; we feel little need to repeat what you will hear from them. Rather, we want to share a few big picture points of emphasis and key things that we feel strongly need to be addressed in your final report and kept in mind by Sen. Murray and Gov. Inslee and all interested parties.

We will begin by noting that the Draft Report affirms some central facts which we and many others have pointed to for years:

- ESA-listed Columbia-Snake Basin salmon and steelhead stocks, and salmon-dependent Southern Resident orcas, are genuinely in near-term peril of extinction.
- For all listed salmon and steelhead populations that utilize the Snake River and its tributaries, the lower Snake dams are a primary source of endangerment.
- There is broad agreement among salmon scientists that restoring a free-flowing lower Snake River is one essential component of a larger regional recovery strategy in order to prevent extinction and to recover abundant, harvestable Columbia Basin wild salmonid runs and support a healthy southern Resident orca population.
- Replacement of the services these four dams now provide is feasible and affordable, can actually improve upon some of the existing services and can create new opportunities not available under the status quo approach.
- The status quo is unsustainable. It has proven costly, illegal and inadequate, and it has perpetuated an atmosphere of uncertainty for all involved. As the draft clearly says, “Change in the Lower Snake River and the Columbia River System Is Inevitable”.

These conclusions cannot be too heavily emphasized in your final report. Nor can the stakes for Northwest Tribes. The draft report details the heavy reliance of Tribes on salmon, historically and to the present day. It acknowledges their centrality to tribal cultures. But we are concerned that it doesn't fully convey the way in which Tribes perceive the extinction of salmon as a genuinely existential issue. We encourage you to ensure that the final report clearly communicates to non-Native readers the incalculable cost of salmon extinction especially for the People of the Salmon.

At least some aspects of this cost can be captured in existence value or passive use economic analysis but even these afford only an incomplete picture of the cost of losing salmon for everyone, but most especially tribes. Where economists have attempted to capture some of the costs of extinction through passive use valuation, the costs of this loss (and the corresponding benefits of sustaining healthy salmon) have dwarfed all other factors and made it clear that keeping the dams will be far more costly than breaching them and replacing their services and the benefits of restoring the river will far exceed any realistic assessment of dollar costs. Your Final Report should acknowledge these important facts. The two analyses of passive use value we are aware of are in the *2019 ECO Northwest Lower Snake River Report* and in the technical appendices of the *2002 Lower Snake River EIS* prepared by the Army Corps of Engineers.

This is a key example of the most critical lacunae in the draft report: the lack of a well-structured, understandable accounting or comparison of all of the costs and benefits of the two possible paths before us: (i) dam removal and service replacement, and (ii) dam retention. The Draft Report provides a range of cost estimates drawn from various sources, over 50 years, of removing/breaching the lower Snake dams and replacing their services. It does not provide a comparable estimate of the costs of operating and maintaining the lower Snake dams, ongoing, and probably increasing costs of salmonid recovery programs, and quantification (monetized where possible) of benefits flowing from recovery of salmon, steelhead, and orca populations, benefits which would almost certainly not be realized if these four dams remain in place.

Media coverage and regional discussion of the Draft Report since its release have thus tended to highlight the \$10-27 billion figure for dam removal and services replacement. We doubt the realism of some of the estimates that went into this total, especially at the high end of the range. But the real problem is that the press, policymakers and the public have no comparable fifty-year estimate of costs - and benefits not captured - if the dams remain in place, because the draft does not provide such a figure.

The Report does include some of the specific elements for such a calculation but does not sum them, consistently translate benefits and new opportunities from a free-flowing lower Snake into dollar values or recognize the immense value of restored salmon abundance in the context of costs and benefits. Specifically, the Final Report should provide a summary of both estimated avoided costs if the dams are removed, and the anticipated value of benefits that would accrue upon their removal. Some of the more obvious avoided costs would, for example, include:

- Annual operating and capital costs of \$134-151 million summed over 50 years, plus major capital costs like turbine replacement and generator rewinding.
- Current annual LSRD fish and wildlife costs of \$54 -159 million/year (from CRSO FEIS 2020, table 3-312) summed over 50 years.
- Costs of additional fish mitigation measures required if the dams remain in place. The draft provides an estimate of lost generation for the FCRPS from such measures (“hydropower generation could decrease by 1,300 average Megawatts (aMW) under average water conditions, and 870 aMW under low water conditions compared to the No Action Alternative”), but does not specify what portion of this reduction would occur at the lower Snake dams or provide a monetized estimate of the value of that lost generation, summed over 50 years.
- Parenthetically, the Report acknowledges the likelihood that climate change-driven reductions in river flows will reduce “the ability for the LSRD to produce peak generation levels and store water to achieve these sustained peaks.” In other words, at least some of the energy services that the dam removal case assumes will have to be replaced will have to be replaced in any case. The incremental cost of replacing the dams’ energy services, if breached, is thus lower than the estimates in the Draft.

The Draft Report also references multiple benefits of a free-flowing lower Snake that will not be achievable if the dams remain in place. The available benefits, including the large benefits to the region, tribes and the whole country of salmon/river restoration need to be added to the avoided costs discussed above to present a comprehensive and balanced account of the costs and benefits of both paths. Examples of these benefits from the report include:

- The Report includes an estimate that, with recovery of listed stocks, tribal harvest could increase by 29% annually. While this result has great cultural value for the Tribes, commercial and subsistence fishing also has quantifiable economic benefits which should at least be estimated and accounted for.
- Recreational fishing, and the individuals and commerce it supports, would also benefit. The Draft Report estimates that salmon and steelhead recovery “...could generate up to \$1 billion annually in additional regional personal income benefits and support up to 25,000 new

family wage jobs”. These annual figures should be summed over 50 years and added to the balance sheet for dam removal.

- The report concludes that, “While the overall trend of commercial salmon and steelhead harvest has been downward since the 1930s, the losses of these economic contributions can be recaptured if efforts to improve abundance, to levels like those laid out in the Columbia Basin Partnership, are successful.” This general statement can be quantified in several ways. For example, as late as 1978, there were over 3000 licensed commercial salmon trollers based in Washington with an average crew size of two (the draft is mistaken in characterizing these trollers as “usually employing at most one crew member; crew could hardly be less than one and, in fact, ranges from one to three). Today there are barely one hundred Washington-based salmon trollers, representing a loss of approximately 6000 jobs in the fishing fleet and more in onshore businesses providing services, supplies and equipment to the fleet. The value of fish landed by these trollers declined from an average in 1976-1980 of \$31.4 million annually to \$2.75 million in 2014-2018 (in constant dollars; documentation attached). Recovering these types of lost jobs and increasing the value of catch landed should be summed over 50 years and added to the balance sheet.

We will add several other observations. The first is that the successive “recovery” plans from the federal agencies have hardly even pretended to aim for recovery; rather they’ve contented themselves with a considerably lower bar - trying to avoid outright extinction. Even if there were no imminent danger of extinction, prevention of extinction is only one of the core purposes of the Endangered Species Act. The second is to recover populations of listed species to the point where they no longer require the protection of the ESA. The failure to propose plans that have any real probability of such full recovery has been one of the several reasons the courts have rejected each and every plan offered thus far.

The second observation we want to share is this: The public debate over the Draft Report has thoroughly validated Sen. Murray, Gov. Inslee and the Biden-Harris Administration - that only political leadership can bring this endless wrangle to a conclusion in a manner that meets needs, solves the impending challenges, and moves everyone forward together. We have spent two decades demonstrating that the courts and federal agencies cannot develop and implement a strategy that is legally valid, scientifically-credible, and fiscally-responsible. And, two decades later, consensus is implausible.

The defenders of the status quo continue to dispute every one of the conclusions in the Draft Report we highlighted at the beginning of these comments. They deny the fish are in peril, pointing to slight upticks in still deeply depressed returns over the last couple of years. If the fish *are* in any kind of trouble, they claim that the problem is poor ocean conditions, rather than the quality and condition of freshwater habitat that has been transformed by the federal system of dams and reservoirs. They ignore overwhelming scientific evidence and suggest that dam removal would make little-to-no positive difference for salmonids and orcas and the people and communities that value and benefit from them. You have further received specific comments denying that change is inevitable. *Pacific Northwest Waterways Association* (PNWA), in a May 4 letter to you, flatly asserted, “There is no reason to assume the status quo will change if the dams remain in place.” *PNWA* and *Northwest RiverPartners* doubled down on that assertion in a May 6 letter: “The operations approved in the final EIS are very similar to those approved by the court and will govern Lower Snake River operations moving forward, absent legislative action. In

that context, there is no reason to assume the status quo will change. If anything, spill is likely to decrease in the future...”.

The failure to achieve a consensus – if consensus means near-unanimity among stakeholders – must not, by default, result in the continuation of a failing status quo. There is clearly a critical mass – a solid majority of Northwesterners – who will support a comprehensive salmon recovery plan whose twin cornerstones are restoration of a free-flowing lower Snake River and full replacement of the services and benefits the dams now provide. Such a plan can work for salmon and orcas, for Tribes and utilities, for farmers and fishermen and for communities in the Columbia Basin and on the coast.

Thank you for your work that helps show the way forward. Please contact us if you have questions or we can assist in any way.

Sincerely,

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NW Energy Coalition

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