October 11, 2017

The Honorable Rob Bishop
Chairman
House Committee on Natural Resources
123 Cannon Building
Washington, DC 20515

The Honorable Raúl Grijalva
Ranking Member
House Committee on Natural Resources
1511 Longworth House Office Building
Washington, DC 20515

Re: H.R. 3144 pertaining to operations of the Federal Columbia River System

Dear Chairman Bishop and Ranking Member Grijalva:

The NW Energy Coalition, an alliance of 100 utilities, environmental and civic organizations, and clean energy businesses in the Pacific Northwest, appreciates the clean, reliable, and affordable energy provided by the Federal Columbia River Power System. We also value the vital contributions that wild salmon and other fish species make to our region’s economy and culture.

That’s why we are concerned by the provisions of H.R. 3144 that would require the federal dams of the Columbia and Snake Rivers to operate under the 2014 Federal Columbia River Biological Opinion (BiOp) until 2022. The BiOp was adopted in 2008 for a ten-year period, amended in 2014, and is set to be replaced in 2018. However, federal judge Michael Simon has determined that the current BiOp fails to meet the requirements of the Endangered Species Act and the National Environmental Policy Act (NEPA) and has directed the preparation of an environmental impact statement, which is now underway and is denoted as the Columbia River System Operations (CRSO) EIS.

By reinstating the illegal 2014 BiOp and by overturning the court’s decision to expand spring spill starting next year at the dams on the lower Snake and lower Columbia Rivers, the enactment of H.R. 3144 would continue the severe damage being done to endangered wild salmon and steelhead populations and communities and wildlife that rely upon them.

Supporters of H.R. 3144 say these measures are necessary to preserve the clean and affordable electricity generated by the four lower Snake River dams. However, analyses by the NW Energy Coalition and other parties demonstrate that there are alternative methods for generating the electricity.
now provided by these four dams. These methods would also provide affordable and reliable electricity without any net increase in pollution or carbon emissions. And they would greatly reduce the damage to fish populations caused by the federal hydro-system.

The four lower Snake River dams meet only about 4% of the Northwest’s requirement for electricity. Their “firm power” – the amount that can be counted on during drought – is only about half that much. Also, the dams’ current and future maintenance costs are much higher than is commonly supposed.

Fifteen years ago, the U.S. Army Corps of Engineers estimated the cost of maintaining the lower Snake River dams at $56 million per year. But, a recent independent assessment by a former Corps engineer estimated that the long-run cost would average $269 million yearly, nearly five times as much.

This larger figure is largely attributable to the fact that the more recent estimate takes into account the cost of rehabilitating the dams’ 24 total turbines as well as operation and maintenance, navigation and dredging, and costs related to these aging dams and their fish passage facilities. Support was provided for the larger estimate when the Corps recently started rehabilitating the turbines. The first three alone cost $97 million, twice the amount the Corps initially estimated.

The alternative to the spiraling costs and ongoing damage to fish populations from continued operation of the lower Snake River dams is to fully explore clean, renewable energy options.

The CRSO EIS must rigorously explore and objectively evaluate all reasonable alternatives to the status quo. We believe it is likely to find that all the energy and capacity currently provided by the lower Snake River dams can be replaced by renewable resources and other clean energy technologies without any increase in carbon emissions and without sacrificing reliability.

That was the conclusion of a 2015 study conducted for the NW Energy Coalition which showed that a portfolio of resources including wind energy, solar, demand response, energy storage, smart grid technology, and purchases of power from across the west can effectively replace the electricity generated by the dams while also “balancing the grid” to assure reliable service despite variations in weather.

The study further concluded that, using conservative estimates of new resource costs, the incremental cost to residential utility customers for this solution would be $1.03 per month on average. For that $1.03 we would be able to give salmon and other species their best chance at recovery while reinvigorating the fishing and tourism industries and restoring a cultural icon to the Pacific Northwest.
Completion of a full and fair CRSO EIS process is essential if we’re to make wise and informed choices about how to fulfill our legal obligations to endangered species while meeting the energy needs of people in the Northwest. Meanwhile, salmon need the near-term help provided by increased spill per the court’s order. For those reasons, we at the NW Energy Coalition respectfully ask you and your fellow committee members to reject H.R. 3144 and allow the comprehensive process initiated by Judge Simon’s ruling to go forward unimpeded.

Sincerely,

[Signature]

Nancy Hirsh
Executive Director
NW Energy Coalition