The federal government’s strategy for Columbia-Snake salmon fails to deliver the comprehensive solution the Northwest needs for its salmon, communities and energy system. A comprehensive regionally-developed solution is more urgently needed today than ever.

I. BACKGROUND:

In July, NOAA issued its 2020 Biological Opinion and the U.S. Army Corps of Engineers, Bonneville Power Administration and Bureau of Reclamation published their CRSO Final Environmental Impact Statement (FEIS). Despite four years in the making and a cost of tens of millions of dollars, these documents fail to move beyond a costly and inadequate status quo. They leave critically-endangered Columbia-Snake salmon and steelhead on the brink of extinction.

The FEIS and BiOp were ordered by the U.S. District Court in Portland in 2016 when it invalidated the agencies’ 2014 plan for Columbia-Snake River Basin salmon. They follow five previous management plans that also have been rejected by the courts as illegal because they did not adequately protect salmon.

The 8,000-page FEIS considers five salmon/dam management alternatives, including one that would restore the lower Snake River by removing its four federal dams. Its ‘Preferred Alternative’, however, rejects this option in favor of spilling a modest amount of water over eight dams on the lower Snake and Columbia rivers - a temporary measure that has been widely acknowledged as an interim, stop-gap approach. The FEIS greatly overstates the costs of a new collaborative approach that includes river restoration and that can solve the inter-connected problems facing salmon, communities and the Northwest energy system.

Based on the FEIS, the Biological Opinion seeks to lock in ‘flexible spill’ as a long-term program that will neither protect nor recover imperiled fish populations. If implemented, this 15-year federal plan will fail endangered Columbia-Snake River salmon and perpetuate high costs and uncertainty for BPA. It will also likely lead to renewed litigation.

II. THIS FEDERAL PLAN DOES NOT DELIVER THE COMPREHENSIVE SOLUTION THAT SNAKE RIVER SALMON AND NORTHWEST COMMUNITIES URGENTLY NEED.

This FEIS focuses only on preventing extinction, when the region is calling for the restoration of abundant and harvestable salmon populations. And even the insufficient goal of preventing extinction will not be met by a stop-gap, ‘flexible spill’ regime that is in place on an interim basis today. Independent scientific analyses demonstrate that current spill levels will not reverse the steady decline of endangered salmon and steelhead populations. And the parties that put this interim agreement in place recognized as much.
An effective solution for salmon and people must move beyond historic conflicts, bring people together and proactively address four urgent, connected issues:

- Restoring abundant, fishable salmon and steelhead populations in the Columbia Basin
- Honoring our nation’s treaty commitments to Native American Tribes.
- Protecting and investing in the vitality of local farming and fishing communities, and
- Continuing the region’s legacy of providing reliable, affordable, clean energy.

III. SOME WAYS THE FEDERAL GOVERNMENT’S STATUS-QUO APPROACH FAILS:

- The FEIS pits salmon recovery against clean, affordable energy: It overstates the cost of replacing power from the Snake River dams and suggests replacing it with fossil fuels - a step we know is unnecessary.

- It ignores science: The FEIS and BiOp dismiss the overwhelming scientific research that restoring the lower Snake River will recover salmon and steelhead and it ignores the benefits to critically endangered Southern Resident orcas.

- It fails to protect salmon: The FEIS fails to acknowledge that ‘flexible spill’ will not deliver sufficient survival benefits for salmon and steelhead, and ignores the fact that any potential benefits will be eroded by hot water reservoirs and climate impacts - effects that river restoration can specifically help mitigate.

- It ignores the benefits of salmon recovery for communities: The FEIS focuses on the financial costs of salmon recovery and ignores the enormous sacrifices already made by Tribes and rural communities in terms of lost fishing opportunity, reduced jobs and incomes, impacts on Tribal cultures and other socio-economic effects. Further, the FEIS ignores the immense economic and community benefits and opportunities of salmon recovery and the investments and jobs that river restoration activities will generate.

- Finally, it ignores avoided costs and future savings from restoring the lower Snake River, including the anticipated savings of more than $1 billion by eliminating the rising capital, operations and maintenance costs for the four Snake River dams.

IV. WORKING TOGETHER, NORTHWEST POLICYMAKERS, STAKEHOLDERS, AND SOVEREIGNS CAN CRAFT A SOLUTION TO MEET THE NEEDS OF BOTH SALMON AND PEOPLE.

- We must stop pitting communities against each other. Across the region, people are calling for a new approach that brings communities together around shared solutions.

- We must honor our treaty commitments with Tribes whose livelihoods and cultures have been profoundly and adversely affected by the loss of Columbia-Snake River salmon.

- Our region must develop a careful investment package, including funding for dam removal, clean energy initiatives, transportation and irrigation projects that can move us all forward together.

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