March 17, 2020

D. Peter Helmlinger, P.E.
Brigadier General,
Army Corps of Engineers
U.S. Army

Lorri Gray, Regional Director,
Columbia-Pacific Northwest
Bureau of Reclamation
U.S. Department of the Interior

Elliot Mainzer, Administrator and CEO
Bonneville Power Administration
U.S. Department of Energy

Dear Brigadier General Helmlinger, Regional Director Gray and Administrator Mainzer:

We are writing to again request that you extend the public comment deadline for the Columbia River System Operations Draft Environmental Impact Statement (CRSO DEIS) well beyond the current deadline of April 13, 2020, in light of the rapidly evolving and escalating national health emergency triggered by the Coronavirus Disease-2019 (COVID-19).

We previously requested such an extension in a March 5th letter because a 45-day comment period is far too short for adequate public review and comment on a DEIS that runs to nearly 8,000 pages, especially for issues of major regional and national significance. In that letter we also provided additional reasons to extend the comment period to at least 120 days, including past statements from your own agencies that a comment period much longer than 45 days would be required. Since that letter, the COVID-19 crisis has erupted into an unprecedented national health threat.

Indeed, in a March 11th letter we urged you to cancel the public hearings you had announced for comment on the CRSO DEIS due to the public health risk of COVID-19, a step you have now appropriately taken and that we appreciate. We continue to believe, however, that the teleconferences are an inadequate substitute—particularly given the unique set of challenges confronting individuals at this time—for public hearings. We still urge you to cancel and replace them with public hearings scheduled at a later date.
Since March 11th, the COVID-19 situation has continued to escalate dramatically from day-to-day in our region and across the country. The urgent need to substantially extend the comment period has grown correspondingly. At this time, most public facilities are closed, nearly all work places have severely limited access, and schools in 29 states (including Washington, Oregon, and Montana) are closed. Our members, our staff, scientists, economic experts, local businesses, fishermen, farmers, tribal members, and many others whose lives may be significantly impacted by decisions considered in the CRSO DEIS are grappling with the unfolding crisis. Their lives are and will continue to be substantially disrupted, and their full attention is properly focused on the health of themselves and their families. Under these circumstances, it would be arbitrary and irrational to ignore this reality and persist with only a 45-day comment period.

In closing, we urge you to announce a substantial extension of the public comment period and other steps as noted above as soon as possible in order to allow all parties interested in the future of salmon, communities and our region’s energy system to have an adequate and meaningful opportunity to review and comment on the CRSO DEIS.

Sincerely,

Linda Behnken, Executive Director  
_Alaska Longline Fishermen's Association_  
Juneau, AK

Wendy McDermott, Director, Puget Sound – Columbia Basin  
_American Rivers_  
Bellingham, WA

Thomas O’Keefe, Pacific Northwest Regional Director  
_American Whitewater_  
Seattle, WA

Chris Hager, Executive Director  
_Association of Northwest Steelheaders_  
Milwaukie, OR

Bob Sallinger, Conservation Director  
_Audubon Society of Portland_  
Portland, Oregon

Joel Kawahara, Boardmember  
_Coastal Trollers Association_  
Quilcene, WA

Brett VandenHuevel, Executive Director  
_Columbia Riverkeeper_  
Hood River, Oregon
Quinn Read, Northwest Regional Director  
*Defenders of Wildlife*  
Portland, OR

LeeAnne Beres, Executive Director  
*Earth Ministry*  
Seattle, WA

Todd True, Attorney  
*Earthjustice*  
Seattle, WA

Leda Huta, Executive Director  
*Endangered Species Coalition*  
Washington, D.C.

Tom Logan, Board Chair  
*Flyfishers International*  
Livingston, MT

Brett Haverstick, Education and Outreach Director  
*Friends of the Clearwater*  
Moscow, ID

Darilyn Parry Brown, Executive Director  
*Greater Hells Canyon Council*  
La Grande, Oregon

Justin Hayes, Executive Director  
*Idaho Conservation League*  
Boise, ID

Nicholas Nelson, Executive Director  
*Idaho Rivers United*  
Boise, ID

Tom France, Regional Executive  
*National Wildlife Federation*  
Missoula, MT

Giulia Good Stefani, Senior Attorney  
*Natural Resources Defense Council*  
Mosier, OR

Grant Putnam, Executive Director  
*Northwest Guides and Anglers Association*  
Clackamas, OR
Liz Hamilton, Executive Director
*Northwest Sportfishing Industry Association*
Oregon City, OR

Shari Tarantino, Executive Director,
*Orca Conservancy*
Seattle, WA

Greg Haller, Executive Director
*Pacific Rivers*
Portland, OR

Joseph Bogaard, Executive Director
*Save Our wild Salmon Coalition*
Seattle, WA

Bill Arthur, Northwest Salmon Campaign Director
*Sierra Club*
Seattle, WA

Mike Petersen, Executive Director
*The Lands Council*
Spokane, WA

Steve Phillips, Boardmember
*Washington Wildlife Federation*
Bellevue, WA

Josh Mills, Boardmember
*Wild Steelhead Coalition*
Tacoma, WA

CC:
Council on Environmental Quality
Northwest Governors
Northwest Congressional Delegation