US Army Corps of Engineers  
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Please accept the following comment letter from SalmonState regarding the Columbia River System Operations Draft Environmental Impact Statement (EIS). The Draft EIS falls far short of what is needed to protect and recover endangered salmon and steelhead populations in the Columbia Basin. The Draft EIS not only ignores well-documented science showing that dam removal on the Snake River is essential to restoring local fish populations, but it also fails to acknowledge that salmon know no boundaries and the economic health of Southeast Alaska’s fisheries and coastal communities depends on the health of the Columbia River. A new approach is urgently needed with state and federal policymakers from both the Northwest and Alaska working closely with stakeholders, sovereigns and citizens to craft a lawful, science-based plan.

SalmonState is an Alaska-based nonprofit initiative with the mission to ensure that Alaska remains a place where wild salmon and the people who depend on them thrive. It is not coincidence that Alaska is home to our country’s last great wild salmon fisheries. In Alaska, we still have healthy wild salmon populations because we still have intact free-flowing rivers and streams. While it may seem like Alaska is a world apart, it is closely linked in many ways to the health and abundance of Columbia-Snake Chinook. Salmon spend most of their lives in the ocean in mixed stock schools that range thousands of miles from their natal streams. In fact, for decades now, Southeast Alaska fishermen have been “on the hook” for much of what happens in the Columbia system. The fact is, just like Southern resident Orca, thousands of commercial, sport and subsistence fishermen in the region are inextricably linked to the health of the salmon runs on the Columbia and Snake Rivers.

How to restore the Columbia Basin’s salmon populations is not a new discussion, which makes the Draft EIS worrisome and frustrating. Rather than embracing calls dating back to the 1990s for a “major overhaul” of hydrosystem operations to protect threatened and endangered salmon
and steelhead, this “new” report recommends only minor adjustments to a status quo plan that will perpetuate many serious mistakes from the past. The draft report does not offer a new approach; rather it recommends minor tweaks to a 25-year federal approach that has cost billions of dollars, brought salmon and steelhead today to some of their lowest levels on record, helped push orcas to the edge of extinction, increased uncertainty for communities across the region, and has been invalidated five times consecutively in federal court.

Flexible spill is the centerpiece of the government’s Preferred Alternative. While the science shows that increased levels of spill can buy some additional time to put in place more effective actions for imperiled fish populations, it is not, by itself, a long-term survival strategy, let alone a recovery strategy. Indeed the parties to the current, short-term Flexible Spill Agreement made this explicit and respected regional scientists have confirmed that the flexible spill included in the Preferred Alternative will not deliver salmon the survival benefits through the hydrosystem they need. The changing climate will further erode any benefits of flexible spill as a long-term approach and only underscores the urgency for meaningful action. The draft plan includes little to address these intensifying impacts on the Columbia River’s salmon populations. Based on the approach recommended by this Draft EIS, recovery will not be an option and extinction becomes nearly certain for remaining endangered Snake River stocks: sockeye, spring/summer chinook, fall chinook and steelhead.

SalmonState supports restoring a freely flowing lower Snake River as an essential cornerstone for any effective strategy to protect and recover its endangered wild salmon and steelhead. The scientific support for restoring the lower Snake River and native fishes that use this basin through dam removal is well established. For over two decades, Tribal, federal, state and independent research has repeatedly corroborated this determination. The just-released 2020 Draft EIS also acknowledges that restoring this river will deliver greater benefits to endangered Snake River fish populations than any other option considered or analyzed. Restoring the lower Snake River through dam removal should be included as a foundational element of the Preferred Alternative.

A dramatically new approach is urgently needed in the Columbia Basin. The Draft EIS falls far short of what is needed to protect and recover endangered salmon populations, putting thousands of American fishing families and businesses at risk with them.

Sincerely,

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