

## Sierra Club Comments on Northwest Power and Conservation Council Amendment to the 2014 Fish and Wildlife Program.

Chair Anders and members of the Council. Thank you for the opportunity to comment on the Council's proposed amendment to the 2014 Fish and Wildlife Program. The Sierra Club has a long history of engagement on salmon and steelhead recovery and related issues in the Columbia Basin. We were integrally involved in the development of Northwest Electric Power Planning and Conservation Act that created the Council and its dual responsibilities to develop energy plans to guide BPA's acquisition of power resources and to develop a Fish and Wildlife Plan to "protect, mitigate and enhance fish and wildlife" of the Columbia River and its tributaries impacted by hydro-power development.

Unfortunately, the proposed amendment falls woefully short of what is needed to meet the requirements of the Northwest Power Act, the Endangered Species Act, and Tribal Treaty responsibilities. Our salmon are in dire straits. After nearly 40 years of plans and \$16 Billion spent our salmon still swim at the brink of extinction. The salmon and steelhead runs this year are dismal. We are getting returns that are only 10-25% of the 10 year average and steelhead fishing in all Idaho waters has been shut down impacting local communities and economies. We are in a crisis situation yet the Council's proposed plan continues a too timid, too little approach to addressing this challenge. The Council's goal of smolt-to-adult returns (SARs) that average 4% are generally good. But the plan's proposed actions will not come close to achieving these desirable goals.

Our salmon and steelhead are running out of time and so are the orca that need chinook salmon from these rivers. We believe the Council should take a step back and join in providing and calling for leadership that can develop a plan that works for salmon, orca, and all affected communities. It is past time for bolder stronger action, including the removal of the four lower Snake River dams, that is up to the challenge. Relying on simply doing more of the same that has failed the salmon and the region will not get the job done.

As you know, many Northwest leaders are calling for a new approach to the intertwined challenges of salmon restoration, a clean, reliable and affordable power

supply that assures a financially healthy Bonneville Power Administration (BPA), and leaves no community behind.

- Congressman Mike Simpson of Idaho has called for a regional discussion of the “hard what-if questions” if the lower Snake River dams are removed and what is needed to secure a financially healthy BPA, and assure that we can continue to get crops to market.
- Governor Inslee of Washington has said it time to have an “honest conversation” about river restoration and the Washington legislature has funded a stakeholder process to look at transition needs if we decide to remove the dams and restore the lower Snake River.
- Governor Brad Little of Idaho has created a working group to examine measures to restore abundant salmon and steelhead populations to Idaho.

We have abundant excellent habitat in Central Idaho, SE Washington, and NE Oregon. What we don't have is enough fish getting back to use it. As we face the additional challenge of climate change the high elevation, cold water habitat of these rivers and streams is even more important. The good news is that recent reports and studies show that we can readily afford to take the single biggest action that scientists have pointed to that will recover salmon by restoring the Snake River.

- A recent independent analysis by Energy Strategies that was commissioned by the Northwest Energy Coalition confirms that we can replace the power generated from the four lower Snake River dams at affordable cost to ratepayers and maintain, or even increase, overall system reliability.
- Another recent study by ECONorthwest shows what others have said for years: that we can provide effective transportation for grain and irrigation for farmers for less than the current federal subsidies to river transport.
- The best and most current scientific analyses - from the joint federal, state and tribal work of the Fish Passage Center - show that as climate change advances, restoring the lower Snake River may be the only truly effective step we can take to lower river temperatures and rebuild SARs for the Snake River salmon and steelhead to the levels the Council has said are necessary.

While the overall plan is incapable of meeting the Council's responsibilities for recovering the salmon and steelhead of the Snake River there are specific actions that we are support that provide important benefits for the Columbia Basin rivers, fish and ecosystems. Specifically, we support:

- The smolt-to-adult (SAR's) of 4% as a desirable goal.

- The proposal by the upper Columbia River tribes to evaluate the feasibility of reintroducing salmon above Grand Coulee Dam which currently block all upriver passage to historic salmon areas. This proposal has a lot of merit and would provide important information about potential restoration and start to address and historic wrong that destroyed salmon fisheries to the upper Columbia River tribes.
- The funding and work to restore lamprey and freshwater mussels to watersheds they have historically occupied. This work provides important ecosystem services as well as restores historic first foods used by native people.

We believe the Council should fund these specific beneficial measures as well as much of the proposed habitat restoration work.

However, it is clear that the Council's overall proposed amendment to the 2014 Fish and Wildlife Plan is simply not sufficient to meet its SAR goals, meet its legal requirements under Power Act and ESA, or its responsibilities to tribal treaties. There is still time for the Council to change course and contribute to a bigger approach that is up to the challenge and opportunity of moment. The Council has substantial analytical capability that can be brought to bear on these issues. The Council members serve the Governor's of their respective states and can encourage and support the type of political leadership that is needed to step up to this challenge.

We must seize this unique moment to take the kind of actions that have been missing and avoided for far too long. We can restore abundant salmon and steelhead, support recovery of the endangered orca, ensure a clean, reliable and affordable energy supply, and build a stronger future for our communities across the region. But it will take bolder vision, political leadership, and stronger actions than are envisioned under the current proposal by the Council.

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