

Idaho Rivers United

Federal Management Plan for Salmon and Steelhead

Managing Salmon: EIS Process

Three federal government agencies (Army Corps of Engineers, Bonneville Power Administration, and Bureau of Reclamation) are responsible for the management of the system of 14 dams along the Columbia-Snake River system. The agencies are also charged with mitigating this hydrosystem's impact on Endangered Species Act (ESA)-listed wild salmon and steelhead, including Idaho's Snake River populations of fish. The latest management plan for salmon and steelhead is known as an Environmental Impact Statement, or EIS. This EIS was ordered by the U.S. District Court of Oregon, after the court rejected a 5th consecutive inadequate salmon management plan in 2016.

A Draft EIS (DEIS) is first created and public input on the report is received. This DEIS was required to balance the functions of the dams with legally mandated salmon recovery efforts while considering social, cultural, and economic factors. It examined five alternatives, including a "no action alternative" before selecting the Preferred Alternative plan.

The DEIS is available online at nwd.usace.army.mil/CRSO/ and public comments can be submitted at comments.crso.info.

Opportunities for comment via teleconference on:

March 17	March 18	March 19
March 25	March 26	March 31

The public comment period ends on April 13th.

What This Draft EIS Recommends

The Preferred Alternative for the Draft EIS recommends an already in place agreement between the Nez Perce Tribe, Oregon, Washington, and the three federal agencies. The plan, known as the *Flexible Spill Agreement*, increases water spilled over the dams to aid salmon migration during certain times of the day and increases water passed through dam turbines for power generation during other hours when that power is high in value. This plan was selected as the Preferred Alternative because, in the agencies' view, it will benefit ESA-listed species, while maintaining the authorized functions of the hydrosystem. In our view the DEIS perpetuates a flawed system that is in dire need of an overhaul.

Why This Draft EIS Falls Short

While increasing spill is beneficial to migrating salmon and steelhead, this recommendation falls far short of a long-term, comprehensive solution that can achieve recovery. The Spill Agreement outlined in the Preferred Alternative is a temporary remedy that merely buys time for critically endangered salmon runs, some of which are *trending toward extinction*.

IRU Recommendations/Comments

1) The DEIS must include a comprehensive economic analysis of **Idaho's salmon sportfishery** and its potential in the event of restored abundant wild salmon and steelhead returns.

- *In 2019 anglers spent \$750 million dollars in the state.*
- *In the Clearwater region in 2003, during a decent return year, salmon*

and steelhead anglers spent \$8.6 million a month.

- *Salmon and steelhead fishing supports guides, outfitters, and businesses in river towns throughout the state.*

2) MO3, the dam breaching alternative, is the only option that meets life-cycle survival criteria, achieves meaningful recovery, and minimizes the jeopardy of extinction.

- *According to the scientific models in the DEIS, only MO3 will lead to smolt-to-adult ratios (SARs) that meet regional goals. Averaging 4 adults returning for every 100 smolts migrating out (4% SAR), with a range of 2-6% SAR has been deemed necessary for recovery to sustained, harvestable abundance.*
- *MO3 is the only alternative that **adequately minimizes the risk of extinction** for Snake River stocks as a baseline; something legally required of this DEIS.*

3) Alternative MO3 needs to include an accurate cost-benefit analysis of the four Lower Snake River dams and the power they generate

- *Purchasing replacement power on the open market would cost \$11 million/year. This is \$38 million/year cheaper than estimated LSRD maintenance and operation expenses and does not include benefits from reduced fish and wildlife and turbine rehab costs.*
- *Turbine replacements and maintenance in the next decade at the four dams will cost tens of millions of dollars a year.*

4) The DEIS needs a more thorough economic analysis on the benefits of a restored Lower Snake River corridor.

- *140 river miles, one-seventh of the entire Snake River, would be restored in the event of dam breaching.*
- *Opportunities for fishing, hunting, wildlife viewing, rafting, and general tourism would positively impact the local economy.*
- *Outdoor recreation is a **\$2.3 billion industry** in Idaho*

A Regional Solution

The federal agency management scheme has proven to be flawed numerous times over the last 25 years. **\$18 billion in federal money** has gone towards recovery efforts since 1981, yet wild salmon and steelhead throughout the Columbia-Snake Basin are still ESA-listed.

Stakeholders throughout the region, desiring something other than uncertainty and divisiveness, are beginning to collaborate with regional elected leadership on a meaningful solution that will:

- 1) *Restore wild salmon and steelhead stocks to harvestable, abundant populations that are well dispersed.*
- 2) *Maintain strong farm communities, while recovering the health of fishing communities.*
- 3) *Invest in regional infrastructure and maintain clean energy reliability.*

Let the Federal agencies know the DEIS doesn't do enough for Idaho's wild salmon and steelhead by **April 13th!**