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September 19, 2022

Via USPS with 10 added enclosures

President Joe Biden
Office of the President
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Re: Request for Executive Action—Tribal Justice and the July 2022 NOAA Fisheries' Draft Report Require Immediate Lower Snake River Dam Breaching to Prevent Snake River Salmon Extinction

Dear Mr. President:

We stand with the Tribes who have come together with a united voice to seek immediate action by the Biden Administration to restore a free-flowing Snake River before it is too late for endangered salmon and orca populations. Breaching is necessary to honor tribal treaty rights, to remedy environmental injustices that have impacted the region for decades, and to recover the most important salmon and steelhead runs in the Pacific Northwest.

More than a year ago Paulette Jordan (Coeur d'Alene Tribe), Save the American Salmon, Jordan Coalition, DNC Council on the Environment & Climate Crisis, Director of Native American Engagement; Jim Waddell, Civil Engineer, US Army Corps (Retired); Chris Pinney, Senior Fisheries Biologist, Walla Walla District, US Army Corps (Retired); and Ken Balcomb, (former) Director, Center for Whale Research, submitted a proposal to the Biden Administration entitled, *"Shovel*

Ready" Executive Action to Create a Win for Native and Rural Americans and Endangered Species, Breaching Lower Snake River Dams Now Opens Up Economic Development in the Northwest. The proposal calls for immediately decommissioning and breaching four surplus hydroelectric dams on the lower Snake River in eastern Washington. A year later, the urgency is greater. ESA-listed Snake River salmon and steelhead are on the fast track to extinction.

The National Oceanic and Atmospheric Administration (NOAA) describes the urgent need for dam breaching in its July 2022 draft report, *Rebuilding Interior Columbia Basin Salmon and Steelhead*. NOAA stresses that salmon recovery depends on large scale actions that include *lower Snake River dam breaching, an action that must begin immediately to avoid continued salmon declines. The science robustly supports dam breaching and overwhelmingly supports acting, and acting now.* The federal government must do more, not less, to restore this mainstem corridor in the face of climate change and the deteriorating ocean or freshwater conditions resulting from climate change. NOAA scientists conclude that *"[i]naction will result in the catastrophic loss of the majority of Columbia River basin salmon and steelhead stocks."* To breach the dams, "[t]he earthen portion of each dam would be removed, and a naturalized river channel would be established around the concrete spillway and powerhouse structures." This is the exact process studied in the *2002 Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement*, but not selected despite the project team's recommendation to do so.

Further, breaching the four lower Snake River dams is required to recover the salmon-dependent, oft-starving, and critically endangered Southern Resident Killer Whales. The Columbia Basin produces approximately half of the whales' prey. The Snake River is the largest tributary of the Columbia River. According to a June 2022 study, *Requirements and availability of prey for northeastern pacific southern resident killer whales*, the whales' dependence on Columbia Basin salmon is increasing, due to the decreasing abundance of Puget Sound salmon. According to Emergency Rules issued by the Washington Department of Fish & Wildlife announced at the end of June 2022, at least 12 of the 75 remaining Southern Resident orcas are in "poor body condition," a designation that gives them a two to three times higher risk of dying, in addition to their already high risk of dying. This is unprecedented. Without dam breaching, the functional extinction of the Southern Resident Killer Whales is imminent.

Climate goals also will be served by an immediate breach. The 140 mile stretch of the lower Snake River is emitting methane equivalent to an estimated 86,000

metric tons of CO2 annually. See *An Update to the 2016 Paper, 'The Lower Snake River Reservoirs Generate Significant Amounts of Methane, a Potent Greenhouse Gas.'* Eliminating the reservoirs and dam impediments will immediately stop the methane emissions, and prevent the mortality of tens of millions of juvenile salmon, that will instead reach the ocean to sustain the food web and orcas.

We thank the Biden Administration for recognizing that "the Columbia River and its tributaries are the lifespring of the Pacific Northwest" and that its "salmon and steelhead sustained the cultures and economies of Tribal Nations since time immemorial." (*Columbia River Basin Fisheries: Working Together to Develop a Path Forward*, March 28, 2022.) As the Administration said, "we cannot continue business as usual." "Doing the right thing for salmon, Tribal Nations, and communities can bring us together." However, doing the right thing can be no longer measured in process actions that are measured in months to years. Actions that lead to breaching within the next few months is the right thing.

While we appreciate ongoing efforts to reach a comprehensive solution for the entire Columbia River basin, the factual and biological reality is that the process of ***breaching the lower Snake River dams can and must begin before completion of this much lengthier process, if endangered species are to survive***.

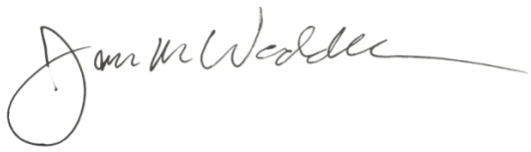
Critically, many have assumed that the energy generated by the lower Snake River dams must be replaced with renewables before breaching the dams can begin. Yet there is little credible modeling that shows how much, if any, energy needs to be replaced. Instead, there is empirical evidence from energy generation logs that show that BPA has base load energy capacity in excess of BPA's responsibilities to serve the preference public power customers for which the dams were constructed. In addition, the dams' peaking power does not need to be replaced, since the same generation logs show that the lower Snake River dams cannot produce more than a few hours of peaking power.

We ask the executive branch to exercise its authority to order decommissioning and breaching the dams. The feasibility of doing so has been described thoroughly in the U.S. Army Corps of Engineers *2002 Final Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement*. Beginning physical breaching in 2022 is technically and financially feasible as explained in *5 Means for Breaching the Lower Snake River Dams*. Congressional appropriations are not needed. The Bonneville Power Administration (BPA) has a legal obligation to mitigate the impacts of the hydropower system on fish. Recent surplus power sales have generated an approximately $600 million surplus for BPA, part of which

could be used to pay for immediate breaching and mitigation of the first two of the four dams – Lower Granite and Little Goose.

Executive action to direct immediate decommissioning of the four lower Snake River dams beginning in 2022 by breaching the earthen berms is needed now. If breaching begins this year, the current favorable ocean conditions will enhance fish recovery in a free-flowing river, and potentially give the salmon the resiliency needed to withstand less favorable ocean conditions in the future. We stand ready to provide technical and legal assistance to help ensure the success of the executive action.

Sincerely,



James Waddell
Civil Engineer, PE USACE Retired

10 Enclosures:

Lower Snake River Dams Breach Mitigation Plan & Cost., DamSense, December 2020

"Shovel Ready" Executive Action to Create a Win for Native and Rural Americans and Endangered Species, *Breaching Lower Snake River Dams Now Opens Up Economic Development in the Northwest*., Letter to Biden Administration July 1, 2021.

Rebuilding Interior Columbia Basin Salmon and Steelhead., NOAA, July 11, 2022

2002 Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement., USACE Walla Walla District.

Requirements and availability of prey for northeastern pacific southern resident killer whales. Couture et al., June 27, 2022

Rule-Making Order., WDFW Emergency for Southern Resident killer whales, June 30, 2022.

WDFW webpage alert on emergency order for Southern Resident killer whales, June 30, 2022.

An Update to the 2016 Paper, 'The Lower Snake River Reservoirs Generate Significant Amounts of Methane, a Potent Greenhouse Gas.', DamSense, 2020.

Columbia River Basin Fisheries: Working Together to Develop a Path Forward., The White House, March 28, 2022.

5 Means for Breaching the Lower Snake River Dams., DamSense, October 2018.