



# Save Our Wild Salmon

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October 19, 2007

Mark Walker  
 Director of Public Affairs  
 Northwest Power and Conservation Council  
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## RE: Comments on the "Carbon Dioxide Footprint of the Northwest Power System" report

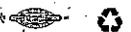
Dear Mr. Walker,

Save Our Wild Salmon (SOS) is a nationwide coalition of conservation organizations, commercial and sport fishing associations, businesses, river groups, and taxpayer advocates – all joined in a commitment to protect and restore Pacific Northwest wild salmon and the communities that depend on them. SOS is pleased to take this opportunity to comment on the Northwest Power and Conservation Council's paper entitled "Carbon Dioxide Footprint of the Northwest Power System," and we further endorse and incorporate by reference comments being submitted to you separately by our allies at the NW Energy Coalition (NWECE).

We want to first thank the Council for taking on this issue, as climate change is one of the greatest challenges we face as a society. The regional effects of climate change will also pose serious challenges for the Northwest's salmon. We agree with the Council that our region must play our part in meeting greenhouse gas reduction targets. We look forward to working with federal and regional entities to find ways to reduce emissions and adapt to already inevitable climate change in a manner that minimizes additional harm to salmon, takes advantage of existing cool water refuges, and allows for the recovery of depressed salmon populations.

It is unfortunate then that one small section of the report has stirred up controversy while the central message – the overall call-to-arms on global warming – has been all but ignored. The report makes a critical point: reducing CO<sub>2</sub> emissions enough to stave off catastrophic global warming will require tough action and hard choices. However, we believe that message has been largely overlooked because of the Council's decision to focus on a controversial section of the report on the effect of actions that most scientists who have studied the issue agree are necessary to restore Northwest salmon and steelhead: removing the four lower Snake River dams.

- Alaska Trollers Association
- American Rivers
- Association of Northwest Steelheaders
- Boulder-White Clouds Council
- Clearwater Biodiversity Project
- Coast Range Association
- Columbia Riverkeeper
- Defenders of Wildlife
- Earthjustice
- Federation of Fly Fishers
- Friends of the Clearwater
- Friends of the Earth
- Idaho Conservation League
- Idaho Rivers United
- Idaho Steelhead and Salmon Unlimited
- Idaho Wildlife Federation
- Institute for Fisheries Resources
- Izaak Walton League - Greater Seattle Chapter
- Lands Council
- Lighthawk
- Long Live the Kings
- The Mountaineers
- National Wildlife Federation
- Natural Resources Defense Council
- North Cascades Conservation Council
- Northwest Ecosystem Alliance
- Northwest Resource Information Center
- Northwest Sportfishing Industry Association
- NW Energy Coalition
- Oregon Guides and Packers Association
- Oregon Natural Desert Association
- Oregon Natural Resources Council
- Oregon Trout
- Oregon Wildlife Federation
- Pacific Coast Federation of Fishermen's Associations
- Pacific Environmental Advocacy Center
- Pacific Marine Conservation Council
- Puget Sound Harvesters
- Purse Seine Vessel Owners Association
- Rivers Council of Washington
- Salmon For All, Inc.
- Salmon For Washington
- Sawtooth Wildlife Council
- Sierra Club
- The Wilderness Society
- Trout Unlimited
- U.S. Public Interest Research Group
- Washington Kayak Club
- Washington Trollers Association
- Washington Wilderness Coalition
- Washington Wildlife Federation
- Water Watch of Oregon
- Wild Angels
- Willamette Riverkeeper



In addition, the report's discussion of the region's ability to replace the electricity from those dams is misleading at best and disingenuous at worst. The paper analyzes one – and only one – dam removal scenario: removing the four lower Snake River dams and replacing them with gas-fired power plants. SOS and other salmon advocates have never supported such a scenario. SOS and our energy allies believe the dams' power output can be – and must be – replaced with energy efficiency/conservation and renewables in order to avoid new sources of greenhouse emissions. Indeed, our analyses indicate that this strategy would likely be the lowest-cost option for replacing the dams' energy. Unfortunately, over the objection of Oregon's Council members, any analysis of this scenario – the only option that salmon advocates actually support – was left out of the Council's paper.

Also missing from the report is discussion of the fact that in a warming Northwest, lower Snake River dam removal becomes even more critical to saving the Snake River's anadromous fish stocks. Scientists predict that global climate change will exacerbate both the magnitude and duration of already lethal temperatures in the lower Snake River and reduce summertime river flows when cool water is needed most. As lower-elevation river temperatures continue to rise, the Columbia Basin's higher-elevation coldwater streams will become even more indispensable to salmon survival. Much of the coldwater, high-elevation salmon and steelhead habitat in the Columbia Basin is in Snake River tributaries, which have the potential to be a stronghold for Columbia Basin salmonids as the climate warms. But as long as access to this habitat remains significantly impeded by the four lower Snake River dams, these fish will lack adequate access to this potential refuge from the effects of global warming.

Scientists have also made the point that, in the face of climate change, salmon in the drier, lower elevation southern reaches of the Columbia-Snake basin (e.g., Snake River fall chinook and lower elevation tributary spawning stocks of spring/summer chinook and steelhead) are fish that, like high-elevation spawners, may be well-equipped to survive the impacts of global warming and "reseed" the basin. These salmon are already adapted to the climate conditions that are going to become more widespread as the region warms.

These unique characteristics of Snake River salmon and steelhead runs are all the more reason to ensure that they survive and thrive into the future. Salmon are nothing if not resilient, but it is increasingly clear that they cannot navigate both global warming and the lower Snake River dams.

Finally, it is also not at all clear why the Council felt it necessary to include a section on what the climate change impacts might be in an imaginary world where no summer or additional court-ordered spill were required. Unless Columbia-Snake River salmon go extinct entirely – a path we may well be headed down if current trends continue – there seems to be no point to conjecture about what might happen in a hypothetical situation where no summer spill was required. 2006-07 injunction spill levels – and probably more – are necessary to improve juvenile salmon survivability with the lower Snake dams in place.

Once again, this section of the report serves no purpose other than to further inflame the heated debate over Northwest salmon and we believe it has no place in a serious analysis of this issue. Instead, the Council should dedicate itself to finding ways to make whatever spill is required to

meet the requirements of federal laws and treaties carbon neutral. An emerging core principle of planning for, adapting to, and reducing the magnitude of climate change is to do so in a way that does not harm existing ecosystems or laws that protect the environment.

SOS further believes that the section on lower Snake dam removal should be excised from the report entirely, as it fails to honestly and comprehensively address the issue. In the event the Council decides to retain it, the report should at least speak to the fact that there are ways to replace the dams' power that do not demand the construction of new gas-fired power plants. It should also acknowledge that no serious participant in the salmon debate supports removing dams in a manner that is not carbon neutral. In addition, the benefits of dam removal on salmon survivability (principally in terms of mitigating the effects of a warmer climate on temperature and flow/smolt travel time, as well as in terms of access to high elevation, cool water spawning and rearing habitat) demand discussion.

As written (and more to the point, as *publicized* by the Council), this report's critical message is being lost in the noise of the long-running debate over how to recover salmon in the Northwest. Clearly, what the Northwest needs is a strategy to both reduce our CO<sub>2</sub> footprint and recover Columbia-Snake River salmon to abundance. The profound challenge posed by global warming should not be used as an excuse or an evasion tactic by those who seek to avoid a balanced, science-based conversation about removing the four lower Snake River dams. The people of the Northwest – and the imperiled salmon with which we share our region – deserve better.

Sincerely,

Rhett Lawrence  
Policy Analyst