



Re: Response to the release of the [Columbia River System Operations Draft Environmental Draft Impact Statement](#) (CRSO DEIS).

The release of the [CRSO DEIS](#) symbolizes an important moment for the Northwest and is the most extensive study completed in the history of the Columbia River Basin. It represents a body of work that required four years of input from federal agencies, Native American tribes, and the states of Oregon, Washington, Idaho, and Montana.

We appreciate the balanced approach required by the National Environmental Policy Act, which requires a comprehensive analysis of the potential environmental, fish & wildlife, and social impacts of a proposed operation. This analysis specifically examined the costs and benefits of breaching the four lower Snake River dams.

The nearly 5,000-page report concluded that the environmental and societal costs of dam breaching continue to outweigh the theoretical and potentially modest benefits to salmon in the Snake River.

The DEIS confirms that the lower Snake River dams are critical to the clean and equitable energy future of the Pacific Northwest. It shows that the cost to replace the different energy-related capabilities of the lower Snake River dams with other zero-carbon options would be approximately **\$1 billion annually** and could increase the average residential customer electric bill by 20% or more.^[1]

We are pleased that the report confirms the importance of the lower Snake River dams to the region's clean energy goals. The report shows that if the dams were replaced with natural gas resources, it would add an additional 3.3 million metric tons (MMT) of CO₂ to the region each year--a 10% increase in the region's power-related emissions. Part of the reason for this increase in CO₂ emissions is that the lower Snake River dams are vital for their ability to help safely add new intermittent resources, such as wind and solar power to the grid. They can store water and release it past hydro turbines, when needed, to fill in the gaps for wind and solar power, keeping the grid in perfect balance. Without the dams, natural gas generation becomes the least expensive alternative to providing balance to the system.

It is well documented that thousands of megawatts of coal plant retirements have pushed the region to the edge of possible blackouts. **The DEIS demonstrates that without the lower Snake River dams in place, the threat of region-wide blackouts would double.**

The loss of the lower Snake River dams would be devastating to the diverse communities that depend on agricultural jobs made possible by irrigation and barging. The DEIS estimates that dam breaching would result in \$458 million of lost social welfare from the inability to irrigate farmland.

These communities anticipate that the effects would ripple through education systems, social welfare programs, and local economies as a result of increased costs and job losses.

This DEIS's conclusions on fish and wildlife are consistent with past findings that show that the lower Snake River dams do not jeopardize the existence of threatened and endangered salmon species that navigate past them.

While we appreciate the report's findings and the complexity of effort involved in putting together such an analysis, **we do believe there is still room for improvement.**

OPPORTUNITIES FOR REGIONAL COLLABORATION

While we acknowledge the significant effort put into the DEIS, we do believe there is still room for improvement. Many regional stakeholders have been calling for collaborative solutions. **We believe there is an excellent and meaningful opportunity to come together around the critical issue of avian predation.** Predatory birds may be responsible for as much as 50% of juvenile salmonid loss in areas of the Columbia River Basin.^[2]

We appreciate that the DEIS Preferred Alternative does address some issues related to avian predation, but there is significantly more opportunity to bolster the plan to reduce this major threat to the future of healthy Columbia River Basin salmon populations.

Northwest RiverPartners will be providing input during the public comment period that encourages a deeper examination of these key issues.

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About Northwest RiverPartners

Northwest RiverPartners is a member-driven organization that serves not-for-profit, community-owned electric utilities in Washington, Oregon, Idaho, Montana, and Wyoming. We also proudly represent partners that support clean energy, low-carbon transportation, and agricultural jobs.

[\[1\]](#) For the millions of customers who get their electricity from utilities served by the Bonneville Power Administration.

[\[2\]](#) 2019 American Fisheries Society, “Cumulative Effects of Avian Predation on Upper Columbia River Steelhead”, by Allen F. Evans, et al