



*Connecting Whales and People  
in the Pacific Northwest*



Dear OPALCO Board of Directors:

I'm writing to bring your attention to some background information regarding OPALCO's approval of the Resolution titled: "[OPALCO Stands with our Whales and Supports our Hydro System](#)" requested by lobbyist Kent Lopez, General Manager at Washington Rural Electric Cooperative Association.

The resolution states: "...there are more total fish in the Columbia River than at any time since the first lower mainstream dam was built at Bonneville in 1938." and "The four Lower Snake River dams enable irrigation for over seven million acres of farmland producing \$8 billion annually in agricultural income, barging of approximately nine million tons of cargo valued at over \$3 billion annually, and annually produce 1,000 aMW of emissions-free power, enough to serve nearly half a million Northwest businesses, industries and households."

In April, 2019, Idaho Congressman Mike Simpson, said:

"...you gotta ask yourself, after spending 16 billion dollars on salmon recovery over the last however many years, is it working?"

"All of Idaho's salmon runs are either threatened or endangered. Look at the number of returning salmon and the trend line is not going up, it's going down. Yeah we have a few blips, a few years past and you can kinda see the numbers kinda coming back up, then they go down again, but the overall trend is down."

"And how much of that 3,000 megawatts do you really need to generate? Because we have excess power that we can no longer sell in California because it's not the low cost power any more. So do you need to produce power that you cannot sell?"

"But my alarm bells first went off when Elliott [Mainzer] spoke at the Northwest Power Planning Council a year ago and you heard the quote that Mark gave earlier that was verified by Elliott so I'm going to say it again: he said that he was not in panic mode, but he is in a very significant sense of urgency mode."

"And then he added,

"The risks facing Bonneville are real. I feel that even though we've got 10 years left on our power sales contracts that it is the time for action and I think real action and that time is now."

"I don't think anybody here would deny that they are facing serious challenges. Their ability to borrow money, 16 billion dollars in debt, I think it's 2023 or something like that, their ability to borrow runs out and Congress has to reauthorize that and I'm telling you, I don't know that Congress will reauthorize that."

Salmon are Rep. Simpson's primary concern:

"These are the most incredible creatures I think that God's created. It's a cycle that God created. We shouldn't mess with it."

"When you think of what these salmon go through when they come back, and I say salmon, not salmons, because we saw one...one. She swam 900 miles, after swimming around in the ocean for 5 years, after being flushed through

dams and out into the ocean. She swam 900 miles to get back to Marsh Creek, increased in elevation about one and a quarter miles, all to lay her eggs for the next generation of salmon.”

Rep. Simpson's entire speech can be found [here](#):

Reinforcing Simpson's primary concern for the devastation of salmon, Eric Barker of the Lewiston Tribune reports: *Low steelhead numbers prompt review - If returns continue to decline, federal officials might take more drastic steps.* "The number of both hatchery and federally protected wild steelhead that return to Idaho, eastern Washington and northeastern Oregon have been sliding for the past four years. Numbers are so low this year that officials closed steelhead fishing on the Clearwater River and its tributaries and parts of the Snake River." "In his letter, Thom [NOAA's Dep. Regional Administrator for Fisheries] noted that some measures, such as spilling more water at the dams, barging more juvenile salmon and steelhead around the dams and reducing fishing pressure, have already been taken. ([Lewiston Tribune Nov 5, 2019](#))

The Technical Advisory Committee, the group that estimates salmon and steelhead run sizes, significantly downgraded its earlier projections for a number of Snake River species, and recently the committee downgraded the downgrades. Steelhead numbers from June 4 to Sept. 10 are only 21% of the 10-year average. Remember that the 10-year average continues to sink as each year's run gets lower and lower.

Tom Owens of OPALCO [wrote](#): "This loss of generation (about what Seattle used in a year) would have to be made up by more generation from fossil fuel plants along with more CO2 emissions. The support these dams provide to the stability of the power system would also need to be replaced as we add more solar and wind. By removing these dams, more salmon could be returning to the Columbia River. These salmon, as they return from sea to the Columbia River, could increase the food source for the one pod of the Southern Resident orcas that travels to the Columbia to feed in winter. Would they really swim up to Puget Sound to benefit orcas here?"

First, it's simply not true that only one pod of Southern Resident orcas travel to the coastal waters to feed. In reality all three pods forage along the continental shelf where Columbia River salmon are migrating to the river to spawn, for most of every year, far more, and increasingly more, than they are found in Puget Sound, or anywhere in the Salish Sea.

Mr. Owen's main point is also not true. The loss of generation would not need to be made up at all because it is surplus power in the BPA power market, as noted by Rep. Simpson. Nor does that power provide stability because the rivers' flows are not stable but seasonal, with high flows in the spring and fall when demand is lowest, and low flows in winter and summer, when demand is highest.

Contrary to the OPALCO resolution, the dams provide zero flood control. They are designed to be "run of river" dams that have to remain at top capacity at all times to operate the locks and the hydroturbines, so there is no storage capacity.

Regarding irrigation, according to a new study conducted by ECONorthWest: [Lower Snake River Dams: Economic Tradeoffs of Removal](#),

“Although the irrigation and transportation benefits of the dams are often touted, a close evaluation finds that they are not substantial relative to the magnitude of other costs and benefits associated with removal. For irrigation, the surface water and groundwater infrastructure can be upgraded to maintain water withdrawals, as most agriculture in the area is not irrigated. The costs of upgrading groundwater wells and surface diversions should be less than \$200 million in total, based on an engineering cost analysis.”

The study also found that significant federal funds are dedicated to maintaining the locks that allow barges to travel up and down the river:

"The benefits produced by the lock system on the Lower Snake River do not justify its continued operation, even without removal of the Lower Snake River Dams...just over 70 percent of the farm products (on a ton-mile basis) currently shipped by LSR barge would switch to being trucked to nearby railroads while the remainder would be trucked downstream to the Tri-Cities area in Washington (i.e. Kennewick, Pasco, and Richland) for loading onto the remaining barging services."

Note that grain transport begins by truck from the farm regardless of where it is taken. And the study found that: "The net annual increase in shipping costs to the region as a result of LSRD removal is \$6.2 million." Rep. Simpson suggested: "Could you buy a railroad line that's operated and run by the grain producers? Possible."

The Resolution also states:

"The Co-op Board, along with more than 25 peer utilities in the region, places their trust in the ongoing federal environmental study to provide the science necessary to understand the full web of interdependent issues at play that includes – in addition to salmon: water temperature, vessel noise, ocean acidification, pollution, forage fish habitat and climate change."

However, the integrity of this process is being actively undermined - critical decisions have already been made and outcomes pre-determined. Transparency is largely absent and public participation and input has been severely limited and often ignored. Although it is still months before the DEIS will be released – and prior to any public review or input, [The Lens reports](#) that 'new conclusions won't be much different than past studies as to whether the dams should be breached.' The Council on Environmental Quality's May 14, 2019 letter to Members of Congress omits mention of salmon, instead emphasizing a 'commitment to water infrastructure'.

It should also be noted that the agencies preparing this new EIS - the U.S. Army Corps of Engineers, Bureau of Reclamation, and Bonneville Power Administration (BPA) - receive \$100s of Millions per year in federal loan guarantees to operate, maintain, and update the dams, to mitigate for the harm to endangered species caused by the dams, and to research, write and publish the steady stream of failed Environmental Impact Statements. Their last five attempted EIS's have been rejected by US District Courts over the past 20 years for failing to protect endangered salmon and steelhead. The new EIS appears intended to extend that record of failure, despite the nearly \$17 billion spent on infrastructure and fish mitigation projects since 1998, representing from one-quarter to one-third of the BPA's total costs.

These agencies on one hand are the beneficiaries of this annual massive federal taxpayer largesse based on the existence and operations of the dams, and on the other hand are tasked with determining whether keeping the dams is justified. The OPALCO resolution serves their financial interests while killing the last native high-altitude salmon and So. Resident orcas.

It is crucial to clear up a commonly misconstrued point about the process of dam removal. It's often said that breaching the dams would take an act of Congress, but no law or provision in any statute is ever provided to clarify why that would be the case. This misinformation provides a convenient smokescreen to cover up the potentially short process encoded in law and in Army Corps official policy. As [stated by Beth Coffey](#), Deputy, Programs Directorate and Chief, Civil Works Integration Division, Corps of Engineers Northwestern Division: "The Corps can place a project in caretaker status when a project is no longer generating the benefits for which it was constructed." This is the case for the 4 Lower Snake Dams based on updated information from the Corps' 2002 EIS used to derive the life cycle economic benefits. For the last few years, annual generation revenue has fallen far below costs. This is of course a big problem for BPA and ratepayers and is due to the rapidly rising cost of operations and maintenance and declining revenues. These dams do not make money even if you use generation revenue provided by the Corps' Walla Walla District, but since BPA has been generating at least 17% surplus power, the loss is really greater since the power is not needed for base load nor is it available for peaking power due to low flows in winter and summer.

According to Corps and Water Resource guidelines “modifying” a project is a change in purpose or scope of a project which the Corps is not authorized to do. But that is not what breaching the earthen berms is, rather, it is the only way to “secure” the project so that it can be placed into a “non-operational status.” In the past, the Northwest Division has erroneously borrowed the term “modify” from an internal Corps regulation ER 1165-2-119 which deals with changing the purpose of a project, e.g., flood control to hydro power. Breaching does not change the purpose of the project. The dams are still hydro power and navigation projects, just not operational.

It is clear that the Corps does have the justification and authority to place these dams into a non-operational status. The four lower Snake dams' purposes and expenses are split 92% hydro power (on average) and 8% for navigation, meaning BPA and its customers must pay 92% of all costs associated with the dams, so they should have a lot to say about the costs and not be forced to continue spending money on dams that are losers.

Additionally, the dams clearly violate the Endangered Species Act by severely impacting endangered salmon and steelhead. And by decimating endangered Spring/Summer and Fall Chinook and steelhead salmon, the dams have directly reduced the availability of those salmon for Southern Resident orcas, severely compounding their nutritional stress and compounding their reproductive impairment.

The September 13, 2019 OPALCO Memorandum states: "OPALCO supports the whales and our federal hydro system. We oppose the removal of the dams because we don't believe it will solve the problem for our fish and the food chain and may worsen the situation."

The following statements by dedicated orca scientists, fisheries and research scientists arrive at very different conclusions.

October 22, 2019 - ...on behalf of 55 fisheries and natural resource scientists.

"Restoring the lower Snake River by removing its four federal dams will significantly reduce mainstem water temperatures on a long-term basis, and is likely the only action that can do so, substantially lowering the risk of extinction for salmon and steelhead here." ([Scientists' Snake River Letter](#))

October 15, 2019 - We are writing as scientists and researchers with many decades of collective experience and a deep familiarity with the life history and current status of the Southern Resident Killer Whales.

"Based on the science and the urgency of the current threats confronting the Southern Residents, we urge the Task Force to recommend to Governor Inslee that he take appropriate steps to ... convene a process to recommend steps for lower Snake River dam removal as soon as possible as top priorities for orca protection." ([Letter to Inslee](#))

August 27, 2018 - We are writing as salmon scientists with decades of experience and considerable familiarity with the science concerning the protection and restoration of healthy, self-sustaining wild salmon populations in the Columbia and Snake River Basins.

"...the most effective measure we know of to permanently increase the sustained abundance of Chinook salmon from the Snake and Columbia Rivers: removing the four federal dams on the lower Snake River and restoring the ecological health of that river corridor." ([Scientists' Snake River dams letter](#))

Ken Balcomb, veteran population biologist who has conducted demographic field studies on Southern Resident orcas since 1976, told KNKX radio:

"Biological extinction – lack of reproduction – is almost there now. If we go at this rate, we have at most, what's left of this reproductive generation," Balcomb said. "Ten or twelve years and then (they'll) be biologically extinct." (*Orca task force adds 13 recommendations at final meeting as 'biological extinction' looms*, By Bellamy Pailthorp, Oct 8, 2019)

Finally, I'd like to suggest for your consideration that the continued vitality of the Southern Resident orca population is in

large part essential for the economic, cultural, emotional, and social, well-being of the people of the San Juan Islands, as well as those along the entirety of the Salish Sea environs, and indeed far beyond our shores. As evidenced by the first words in the title of this Resolution: "OPALCO Stands with our Whales..." there is utmost unanimity in our community's fascination and dedication to the orcas with whom we share our waters. You may consult the Orca Network Facebook page (over 158,000 followers), whenever orcas, especially members of J, K, or L pods, appear near the shoreline anywhere in the Salish Sea. As J pod is foraging along the east side of Whidbey Island reports have been flowing in for days, from Pt. Defiance to Langley, mostly from new observers thrilling to a once-in-a-lifetime experience, with comments like: "Amazing, dream come true!" or "What is the emoji for so much joy?!"

These are our human responses to experiencing such majestic, intelligent, and endearing beings making their living alongside us, including OPALCO's members and customers. With this resolution OPALCO is participating in a widespread and historic subterfuge to protect four dams that provide only interminable debt and massive environmental destruction, including the starvation unto extinction of our precious Southern Resident Orcas. Please rescind this resolution.

A handwritten signature in black ink, appearing to read "Howard Garrett". The signature is fluid and cursive, with a long horizontal stroke at the end.

Howard Garrett  
Board President, Orca Network

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