

April 13th, 2020

D. Peter Helmlinger  
Brigadier General, US Army, Division Commander  
U.S. Army Corps of Engineers  
Northwestern Division  
Attn: CRSO EIS  
P.O. Box 2870  
Portland, OR 97208-2870

Electronically Submitted: <https://comments.crso.info/>

RE: Columbia River System Operations, EIS No. 20200052

Dear Mr. Helmlinger:

American Whitewater provides these comments in response to the Draft Environmental Impact Statement (Draft EIS) on Columbia River System Operations.<sup>1</sup> We appreciate that you included removal of four dams on the lower Snake River (Lower Granite, Little Goose, Lower Monumental, Ice Harbor) among the alternatives considered (referred to in the document as MO3). Removing the four lower Snake River dams would open opportunities for a 140-mile, multi-day river trip and will enhance on-river recreation opportunities in key tributaries. We also appreciate that you responded to issues we raised in scoping to consider recreational benefits of a restored Snake River and associated economic impacts as part of the analysis of socio-economic effects. We provide specific comments on these issues, as presented in the Draft EIS, below.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 50,000 supporters, 6,000 dues-paying members, and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates. Our members enjoy opportunities for river-based recreation throughout the Snake River basin.

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<sup>1</sup> 85 FR 11986

## **Process Comments**

While we appreciate the attempt to make accommodations in response to the evolving health and safety policies designed to hinder the spread of COVID-19 in Washington and Oregon, we feel they resulted in inadequate public engagement. A representative from American Whitewater attempted to join one of the phone-in meetings, dialing multiple times over a period of several minutes, but consistently encountered a busy signal. The comment period should have been extended to allow for adequate public participation and to provide critical opportunities for direct engagement that public meetings provide.

## **Comments on Purpose and Need**

The Purpose and Need states that “EIS will evaluate how to insure that the protective management of the System is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of designated critical habitat.”<sup>2</sup> The preferred alternative appears to fall short in insuring management is not likely to jeopardize and instead relies on “expected” and “anticipated” improvements for salmon. Alternative 3 (MO3) in contrast, that would include breaching the four lower Snake River Dams, “predicts the highest benefits for several of the ESA-listed juvenile and adult salmon and provides additional riverine-type recreational opportunities.”<sup>3</sup>

## **Comments on Recreation**

The initial NOI stated that the “EIS will consider the direct, indirect, and cumulative impacts of these alternatives on affected resources, including geology, soils, water quality and quantity, air quality, fish and wildlife (e.g., ESA-listed species and their designated critical habitat), floodplains, wetlands, climate, cultural resources, tribal resources, social and economic resources, and other resources that are identified during the scoping process.”<sup>4</sup> In our scoping comments we noted that recreation was not included in this list and requested that the Action Agencies consider the direct, indirect, and cumulative impact of all alternatives on recreation as part of the EIS process. We appreciate the response to our request and the inclusion of recreation in the Draft EIS.

### *Economic Valuation of a Restored Snake River*

Free-flowing rivers are necessary for healthy fish populations, but they also provide opportunities for river-based recreation that includes rafting, canoeing, kayaking, tubing, fishing, and drift boating. The 140 mile stretch of the Snake River that could be restored

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<sup>2</sup> At Page 16, Executive Summary, Columbia River System Operations Draft Environmental Impact Statement.

<sup>3</sup> At Page 24, Executive Summary, Columbia River System Operations Draft Environmental Impact Statement.

<sup>4</sup> 81 FR 67382

through the removal of the dams would restore opportunities for day trips and multi-day trips along a stretch of river that historically had 63 named rapids, approximately 70 small islands, and numerous boat-accessible sites for camping and day use. The entire stretch would provide opportunities for a week-long river trip. With intermittent road access, day trips or weekend trips would also be possible. Recent research has demonstrated that rivers are resilient and most respond quickly to dam removal, particularly when dams are removed rapidly, over a period of months and not decades.<sup>5</sup>

While the Draft EIS states that “communities affected, such as Clarkston, Lewiston, and Asotin, would lose their ‘river port’ identity,” the DEIS should acknowledge that this seaport was only established in 1975.<sup>6</sup> Prior to that time, and for thousands of years, the identity of the river was as the world’s greatest salmon resource with villages and an entire society that depended on this resource and used the waterway for transportation. In 1805 Lewis and Clark experienced their canoe journey “through the canyon-lined Snake” where they “passed innumerable Indian villages” along a river that “produced more salmon than any other river in the world.”<sup>7</sup> The identity of the Snake River, over thousands of years, is a waterway used by paddlecraft providing a bountiful nursery for wild salmon prior to the construction of the dams.

Restoring the lower Snake River would open opportunities for communities to reconnect to their riverfronts, rather than further extending levees that wall off the river. It would provide enhanced recreational opportunities that we believe will create stronger economies for riverfront communities. Under the dam removal alternative (MO3), the Draft EIS makes the assumption that “land-based recreation may return sooner than water-based recreation.”<sup>8</sup> We are unclear of the basis for this assumption, other than some general comments that infrastructure needs are required to support river-based recreation, and request that it be more clearly articulated and documented in the Final EIS.

In evaluating the economic impact of recreation with the dam removal alternative (MO3), the EIS highlights “concerns” with prior studies on the economic benefits of recreation, and specifically the economic analysis from the 2002 Lower Snake River Juvenile Salmon Migration Report/Environmental Impact Study. The current Draft EIS challenges the assumption of visitation rates that are “much higher than visitation estimates to other free-flowing river/unimpounded river stretches,”<sup>9</sup> and that visitors from California would travel to the Snake River. The Draft EIS “presents adjusted visitation estimates from the 2002 EIS without California visitors.”<sup>10</sup> There are a few issues with these assumptions. First, many of the other free-flowing river/unimpounded river stretches in the region are managed through limited-entry permit systems and

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<sup>5</sup> O’Connor, J.E., J.J. Duda, and G.E. Grant. 2015. 1000 dams and counting. *Science* 348 (6234) 496-497.

<sup>6</sup> Idaho Gets a Seaport, Capping a Costly 10-Year Effort, By Ralph Blumenthal, Special to The New York Times, April 13, 1975, page 57, <<https://nyti.ms/3bcTv6A>>.

<sup>7</sup> At Page 168, Ambrose, S.E., 1998, *Lewis and Clark Voyage of Discovery*, National Geographic Society.

<sup>8</sup> At Page 3-1178, *Columbia River System Operations Draft Environmental Impact Statement*.

<sup>9</sup> At Page 3-1216 and M-6-7, *Columbia River System Operations Draft Environmental Impact Statement*.

<sup>10</sup> Ibid.

demand for these experiences has continued to increase. Over the past decade for example, odds of securing a permit to float the Snake River through Hell's Canyon have increased from 1 in 6 in 2010 to 1 in 17 in 2020.<sup>11</sup> For the Salmon River, the odds have increased from 1 in 17 in 2010 to 1 in 43 in 2020.<sup>12</sup> These rivers are managed at relatively low use levels to achieve a specific social experience consistent with a wilderness setting. New opportunities on a restored Snake River could be managed for a social experience that does allow much higher visitation rates than found on other free-flowing river stretches higher in the drainage that are managed for this wilderness experience. Additionally, the vague statement regarding California visitors that "data for other free-flowing rivers/unimpounded river stretches suggested that would be unlikely,"<sup>13</sup> is not explained or justified. A high percentage of our membership lives in California and travels throughout the West for opportunities to enjoy river-based recreation. We request further explanation and clear citation to these data suggesting a lack of visitation from California in the Final EIS.

The Draft EIS describes the Hanford Reach of the Columbia River as potentially comparable to a restored Snake River.<sup>14</sup> A key limitation of the Hanford Reach that artificially reduces use is the lack of camping facilities that precluded opportunities for overnight or multi-day trips. We concur that the estimates from these proxy sites would considerably underestimate future recreational activity on the lower Snake River.

We appreciate that the Draft EIS notes that "access to the river and its recreational opportunities will be paramount for the reestablishment of river visitation to the lower Snake River."<sup>15</sup> In our experience, other river restoration efforts have highlighted the benefits of dam removal on enhanced recreational opportunities without accounting for the need to invest in the recreational infrastructure to provide the access necessary to support new uses.

Based on the information presented in the Draft EIS, we do not agree with the conclusion that impacts to recreation would be large and adverse given how quickly river systems recover following dam removal; we acknowledge that the summary of effects does note that river recreation "may eventually increase to levels and values greater than under the No Action Alternative."<sup>16</sup> We believe however that additional assessment is warranted. In our scoping comments, we requested an updated economic analysis given changes that have occurred over the two decades since the 2002 analysis was conducted. We noted the increase in regional population,<sup>17</sup>

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<sup>11</sup> USDA Forest Service, Four Rivers Lottery Statistics, <[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5408633.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5408633.pdf)>.

<sup>12</sup> Ibid.

<sup>13</sup> At Page 3-1216, M-6-7, Columbia River System Operations Draft Environmental Impact Statement.

<sup>14</sup> At Page 3-1218, Columbia River System Operations Draft Environmental Impact Statement.

<sup>15</sup> At Page 3-1215, Columbia River System Operations Draft Environmental Impact Statement.

<sup>16</sup> At Page 3-1221 and Page M-6-14, Columbia River System Operations Draft Environmental Impact Statement.

<sup>17</sup> Annual Estimates of the Resident Population: April 1, 2010 to July 1, 2016

Source: U.S. Census Bureau, Population Division, Release Date: December 2016.

increased demand for river trips,<sup>18</sup> and our additional understanding of the rapid pace at which rivers recover following dam removal.<sup>19</sup> Some of this assessment has been done, but the analysis for the dam removal alternative (MO3) remains incomplete. Unfortunately, the Draft EIS relies heavily on “existing data and past efforts”<sup>20</sup> and does not include sufficient new or updated analyses. In our scoping comments we requested a survey to estimate the value that the American public places on a restored Snake River and referred to the study design and implementation methodology used to determine the non-use values in the Klamath River Basin.<sup>21</sup> This comment was not addressed in the Draft EIS.

### *Local Community Benefit*

#### *Socio-Economic Impacts to Recreation on Upstream Tributaries*

In our scoping comments, we requested that the Draft EIS evaluate the socio-economic impacts of dam removal on river-based recreation on upstream tributaries like the Salmon, Lochsa and Selway Rivers. Currently, river management agencies are implementing restrictions on boating out of concern over their impact on salmon. For example, the Forest Service had a policy of reissuing river permits for the Middle Fork Salmon that came available through trip cancellations. Today, the agency no longer re-issues these permits during the salmon spawning season (August 15 to September 15) in order to reduce overall recreational use in an effort to reduce potential impact to spawning Chinook salmon. The policy is based on a concern that a large number of boats floating over spawning salmon could cause them to repetitively leave their redds. This in turn could lead to a reduction in reproductive success or complete reproductive failure through pre-spawn mortality if the salmon expend too much energy in their repetitive avoidance behaviors. We remain concerned with the larger issues that have driven river management agencies to take such wide-reaching measures to protect salmon in the basin. Biologists involved in establishing the policy on the Middle Fork Salmon communicated to us that salmon runs are at 5% of their historical level, and that the dams on the Snake and Columbia River responsible for the 95% reduction in salmon populations. We are concerned about the future of recreation opportunities in the entire Snake River basin, as river management agencies are considering additional management actions to restrict paddling if salmon runs continue to decline.

The Draft EIS was not responsive to our request to analyze the socio-economic impacts on recreation in the upstream tributaries on both removing the lower Snake River dams and keeping them in place. We noted that this analysis should consider the impacts of increased limitations on recreational activity if salmon are not recovering, and issue that is having a real impact on our community.

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<sup>18</sup> With increasing demand more rivers have had to go to limited-entry permit systems as evidenced. Most recently the John Day joined the list of rivers that distribute permits through reservation system. See <<https://www.americanwhitewater.org/content/Article/view/articleid/30958/display/full/>>

<sup>19</sup> The Restored Lower Gorge on the White Salmon River, Sheer Madness Productions, <<https://vimeo.com/52085922>>.

<sup>20</sup> At Page 3-1215, Columbia River System Operations Draft Environmental Impact Statement.

<sup>21</sup> See Carol Mansfield et al., “Klamath River Basin Restoration Nonuse Value Survey,” January 19, 2012 (see especially, Table 2-1, Previous Valuation Studies of Dam Removal or Related Restoration Efforts).

## Summary

We appreciate the effort that went into the Draft EIS and inclusion of recreation as an issue that was evaluated under the alternative that included removal of four dams on the lower Snake River (MO3). We also appreciate that you responded to issues we raised in scoping to consider recreational benefits of a restored Snake River and associated economic impacts as part of the analysis of socio-economic effects. The analysis however falls short of what is necessary for an informed public process, relies too heavily on data and studies from two decades ago, and significantly undervalues the economic and social benefits of a restored river.

Based on what we have reviewed in the Draft EIS, and the primary objective of the Purpose and Need for an alternative that is not likely to jeopardize the continued existence of any endangered species or threatened species, we believe Alternative 3 (MO3) best meets this standard.

Thank you for considering our comments as you proceed with the environmental analysis for this project. More work remains with both the biological and social science necessary for a full, honest, thorough analysis of costs and benefits of a restored river.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a long horizontal stroke extending to the right.

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director