

American Fisheries Society Western Division

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Dr. Jane Lubchenco, Administrator National Oceanic & Atmospheric Administration 1401 Constitution Avenue, NW Washington, DC 20230 jane.lubchenco@noaa.gov 4 May 2009

Dear Dr. Lubchenco:

The Western Division of the American Fisheries Society (WDAFS) is comprised of nearly 3500 fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, diverse private employers, college students, and retirees. Our mission is to exchange technical and policy information and to promote understanding by regional, Federal, and state policy-makers of the nature and extent of fishery matters of concern to the membership.

At its annual meeting on 19 July 2000, the WDAFS resolved that breaching of the lower four dams on the Snake River represented a key option for recovering Snake River salmon and steelhead. Again in 2005, when we submitted our scientific peer review of the 2004 BiOp Remand (attached), we repeated that conclusion. At this critical juncture, we reaffirm that position, summarized below.

In contrast to the uncertainty of success from the removal of hydro projects in other portions of the basin, the benefits to Snake River stock recovery would be assured with the removal of the lower Snake River dams (i.e., the lack of any significant recovery in these stocks suggests little adaptation has occurred in these populations). Rather, the dams and their reservoirs create migratory barriers and habitat favoring salmonid predators, such as the northern pikeminnow, walleye and smallmouth bass, whose numbers are several-fold greater than in cold and free-flowing rivers. In addition, it is evident that salmon production in the John Day River (where habitat is mediocre to good) is higher than in the Grande Ronde and Salmon Rivers (where habitat conditions are good to excellent)--because the lower Snake River dams do not block John Day access.

The economic benefits of the lower four dams on the Snake River remain equivocal and largely replaceable through other public works investment (see Whitelaw 2000 attached). We emphasize that the removal of dams is not the only option—dams can be breached, power can be generated through bypass reaches while allowing near-normative flows, irrigation water can be pumped, cargo can be shipped by rail. In short, the debate need not focus on the 'either/or' scenario, but the debate *must* consider the costs inherent to the extirpation of the unique Snake River salmon populations that once comprised most of the Columbia's salmon production.

Thank you for considering our position as you attempt to balance FCRPS operations against the survival and productivity of salmon and steelhead listed under the Endangered Species Act.

Sincerely,

Scott Bonar, President