

These comments are submitted by the North Olympic Group of the Sierra Club as a supplement to, and in support of, the Club's comprehensive comments.

We appreciate the opportunity to provide our perspective on the scope of the forthcoming EIS on Columbia River System Operations. We expect that a full and fair evaluation of all options for restoring healthy populations of salmon (and other fish and wildlife) in the Columbia/Snake Basin through changes in river infrastructure and operations will reach the conclusion that removal of all four Lower Snake dams is essential to achieving that goal. In fact, we believe that the lead agencies already have, in hand, entirely sufficient evidence, to have reached that conclusion. We look forward to its affirmation through this process.

Specifically, we expect an analysis that fully and fairly considers a realistic scenario for removal of all four Lower Snake dams, unburdened by extraneous or unnecessary assumptions. The analysis must also:

- 1) Take full account of clean, cost-effective alternatives (energy efficiency and new renewable resources) to the dams' modest contribution to the regional power system.
- 2) Take full and fair account of scientific evidence on *requirements* for recovery of endangered salmon populations
- 3) Take full account of the ongoing capital investment and operating costs of these aging dams.
- 4) Recognize the ongoing decline in barge and container traffic on the Lower Snake and fairly considers road and rail transport alternatives,
- 5) Incorporate the best available science on impacts of climate change in the Columbia/Snake Basin, e.g., likelihood of rising reservoir water temperatures.

Living, as we do, on the Olympic Peninsula, we have a couple of particular perspectives on the scope of this EIS. We believe that recovery of endangered salmon populations is key to recovery of endangered orca populations in our neighborhood and beyond. Our orcas are highly salmon-dependent. The single most effective available action to restore orca populations is to restore robust populations of their food.

A second local perspective comes from our own experience of the river-restoring power of dam removal on the Elwha. To say that early returns are encouraging is to understate the speedy revival of the river, the quick return of spawning salmon to reaches above the site of the former dams, the ongoing restoration of the river delta, and the new supply of food for carnivores in Olympic National Park.

Columbia/Snake salmon are an irreplaceable and renewable resource. The Lower Snake dams are eminently replaceable.

Janet Marx. Chair
Sierra Club North Olympic Group