

**Oregon Chapter
American Fisheries Society**
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October 2, 2009

Judge James A. Redden
United States District Court - District of Oregon
1527 United States Courthouse
1000 S.W. Third Avenue
Portland, Oregon 97204-2902

Dear Honorable James A. Redden:

On February 17, 2000, the Oregon Chapter of the American Fisheries Society (ORAFS) unanimously passed a resolution (attached) that breaching of the four lower Snake River dams should be considered as an essential component of the recovery of Snake River salmon and steelhead*. When the revised (2008) Federal Columbia River Power System (FCRPS) Biological Opinion (BiOp) was issued, ORAFS members reviewed it and reaffirmed our position that dam breaching should remain an essential element of salmonid restoration. We write today to further reaffirm this position and suggest that it is not adequately addressed in the NOAA Fisheries' September 15, 2009 Adaptive Management Implementation Plan (AMIP).

While the AMIP is an improvement to earlier BiOp versions, it contains several crucial, but correctable, shortcomings:

- 1) It maintains obscure language relating to salmonid recovery (e.g., "trending toward recovery"),
- 2) It fails to directly, rapidly, and comprehensively address dam breaching as a key component of salmonid recovery (e.g., see AMIP pages 14, 23, 36-39 and AMIP Appendix 1 pages 15-17),
- 3) It does not specify which body/entity will evaluate the study of the efficacy of dam breaching on salmon recovery (see AMIP page 41),
- 4) It proposes several indicators of failure (i.e., "triggers" for management action) but does not clearly specify the remedial actions, offer timelines for remedial actions to occur, nor specify levels of effort "triggered",
- 5) It offers no benchmarks for success (or how to measure success), and
- 6) It fails to deal with the underlying pressures of human population growth and per capita resource consumption (together producing economic growth) as substantial drivers of salmon extirpation.

And while the AMIP attempts to address the impacts of climate change, invasive species, and introduced species on salmon and their habitats, it essentially lays out a *monitoring* strategy rather than a *recovery* strategy. Whereas monitoring *may* provide valuable insights for informing adaptive management processes, recovery requires effective and timely actions (such as improving fish habitat and passage). Rather than treating dam breaching as an action worth at least equal consideration to other salmonid management alternatives, the AMIP relegates even the study of it to merely a potential action (see AMIP pages 14 and 36-39) occurring on a delayed schedule relative to other actions, none of which differ fundamentally from past failed actions. It is the

opinion of the ORAFS that a science-driven, comprehensive study of dam breaching, including resource and economic effects, with independent scientific review, be included as a *primary and immediate step* such that breaching actions could be implemented much sooner than currently contemplated.

Thus, at this critical juncture, we: 1) believe the AMIP to the 2008 BiOp does not adequately address recovery of Columbia River salmonids, 2) reaffirm our 2000 resolution, and 3) argue that the four positions described therein represent the best way to recover the Snake River's listed salmon and steelhead. The attached resolution (and supporting document), which remains relevant today, is the product of considerable thought, scientific insight and process among members of the ORAFS. Please consider them in your decision as you deliberate on NOAA Fisheries' 2009 AMIP to the 2008 Biological Opinion on the operation of the FCRPS.

The ORAFS is comprised of over 450 fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, diverse private employers, college students, and retirees. The Chapter was established in 1964 as part of the American Fisheries Society. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse concerning fisheries and aquatic science and by promoting the development of fisheries professionals.

Thank you for the opportunity to assist in your review of proposed FCRPS operations for salmon and steelhead listed under the Endangered Species Act. Please consider our resolution and our review of NOAA Fisheries' 2009 AMIP and 2008 BiOp as you do so.

Sincerely,



Richard Grost
ORAFS President

Attachments:

ORAFS Snake River Resolution 2-17-2000.pdf

CC:

Idaho Chapter AFS President Jim Fredericks
Western Division AFS President Leanne Roulson
National AFS Executive Director Gus Rassam
National AFS President Donald Jackson
National AFS Policy Coordinator Elden Hawkes, Jr.
NOAA Administrator Dr. Jane Lubchenco
Oregon Governor Theodore Kulongoski
Oregon Attorney General John Kroger
Oregon Gubernatorial candidates John Kitzhaber, Bill Bradbury, Allen Alley, Jason Atkinson, John Lim

*The Idaho Chapter of the American Fisheries Society and Western Division of the American Fisheries Society have also passed resolutions in support of dam breaching for Snake River salmon and steelhead recovery.