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In a recent Opinion piece, NOAA administrator Jane Lubchenco stated that salmon recovery is now being guided by science and pointed to increased survival of juvenile salmon and improved returns of adult salmon as validation of this program ("Columbia River salmon: Letting science guide salmon recovery", Oregonian, February 27, 2011). Attributing improvements in salmon and steelhead returns to the recovery program alone is misleading. Survival of juvenile salmon in the Columbia River has increased because of improved passage conditions, due largely to increased spill at the dams (ironically an action imposed on federal agencies by court order). Improved ocean conditions have resulted in increased adult returns for some populations of salmon and steelhead. Unfortunately most returning fish are from hatcheries; *wild* fish populations remain far below recovery levels. Although Lubchenco asserted that "science supports" the NOAA plan, a comprehensive review by the Western Division of the American Fisheries Society (www.wdafs.org) concluded it relied more on monitoring than on specific actions; monitoring adequate for tracking the status of salmon, but not adequate for ensuring their protection and recovery.

Science alone will not guide salmon recovery; ultimately this will be a societal decision. However, the public should not be misled into believing that the best available science has been fully considered, as NOAA contends. Many human actions have contributed to the decline of the Columbia runs of salmon and steelhead including habitat degradation, overharvest, and poor hatchery programs. Dams, reservoirs, and operation of the hydropower system have been major contributors – especially for Snake River populations – and are also contributing to the decline of other native species, notably the Pacific lamprey and white sturgeon. Yet, much of the NOAA recovery approach is a tacit acceptance of the status quo when it comes to the hydropower system.

In 2000, the Oregon Chapter of the American Fisheries Society (www.orafs.org) – representing hundreds of fishery professionals – passed a resolution that "The four lower Snake River dams are a significant threat to the continued existence of remaining Snake River salmon and steelhead stocks; and if society… wishes to restore these salmonids to sustainable, fishable levels, a significant portion of the lower Snake River must be returned to a free-flowing condition by breaching the four lower Snake River dams, and…this action must happen soon." The Chapter reaffirmed this resolution in 2009. The Idaho Chapter and Western Division of the American Fisheries Society, collectively representing thousands of aquatic scientists, have also passed similar resolutions. Furthermore, results from a scientific assessment – a five-year effort of regional scientists convened by NOAA – indicate that the action with greatest certainty of recovering Snake River salmon and steelhead is breaching the lower four Snake River dams.

Yet NOAA now considers even the *study* of breaching the Snake River dams to be essentially an action of last resort, triggered only when fish runs fall to perilously low numbers. Should society decide to implement dam breaching, many years of study and planning would be required. Comprising several generations of fish, this could severely limit the value of the action if important salmon and steelhead populations go extinct before the first shovel of dirt were moved.

Lacking the information necessary to assess the technical, physical, and biological effects of breaching the Snake River dams, NOAA cannot meet its stated objective of using the "best available science" to develop recovery actions. The Oregon Chapter of the American Fisheries Society encourages a proactive, comprehensive study of dam breaching, with independent and open scientific review, so that this recovery action could be thoroughly considered and implemented in a timely manner. Hundreds of dams in the United States have been removed, with a growing record of immediate and positive responses by rivers and native fish. If society decides recovery of these imperiled fishes is truly important, we should consider this science-supported recovery action for the Snake River and its fish.

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