



## Statement of Jeff Curtis Trout Unlimited

My name is Jeff Curtis. I am the Western Conservation Director of Trout Unlimited. Trout Unlimited is a national conservation organization with over 110,000 members, including over 8,000 in the Pacific Northwest and Alaska. Our mission is to conserve, protect and restore North America's trout and salmon fisheries and their watersheds.

The Region - and indeed the Nation - is confronted with a very important, and difficult decision. Will we allow a species that has existed for over a million years, a species that survived the ice age, to be eliminated by less than 200 years of unbridled human exploitation of the salmon and their habitat. In making this huge decision, the region needs to be guided by the best scientific and economic information available. Unfortunately, that information is not being presented to the region.

Since we are allotted only 3 minutes, my colleague Scott Yates will address some of the inadequacies in the economic information presented in the DEIS.

Trout Unlimited and American Rivers have contracted with one of the region's most qualified experts on decision modeling, Dr. Gretchen Oosterhout. Dr. Oosterhout, working with scientists from some of the federal agencies, the states and the tribes, has examined the work of the Cumulative Risk Initiative that provides much of the scientific basis for the DEIS and All H documents. What she has found are a series of major errors that compromise the science in those documents and, more importantly, the policy discussions relating to the alternatives that have been presented to the region. She has exposed those errors in a document entitled "7 Questions About the Cumulative Risk Initiative," which we are entering into the record.

1 Obviously do not have time to go into all of the questions. Let me highlight just one with the help of the chart that my colleague is holding up. The CRI chose a quasi-extinction threshold of "one fish or fewer" to analyze the risk of extinction. The choice of that threshold is virtually unheard of in the field of conservation biology. It gives the region an overly optimistic view of how much time we have to take dramatic actions to save the salmon, such as breaching the four lower Snake River Dams.



**Table 1. Expected years to extinction, using the Dennis model, for different quasi-extinction thresholds**

| Stream      | Quasi-extinction threshold (time predicted for the population to decline from its current size to a spawning population of 1, 15, or 50 fish) |             |            |
|-------------|---|-------------|------------|
|             | 1 fish  | 15 fish     | 50 fish    |
| *Marsh      | 49.1 years  | 16.6 years  | 2.2 years  |
| Johnson     | 279.7 years   | 114.3 years | 40.8 years |
| Imnaha      | 81.8 years  | 45.1 years  | 28.7 years |
| Bear Valley | 151.0 years   | 68.5 years  | 31.8 years |
| Poverty     | 336.0 years   | 170.9 years | 97.5 years |
| *Sulphur    | 317.4 years   | 113.4 years | 22.6 years |
| Minam       | 173.8 years   | 74.68 years | 30.6 years |

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cont.

Dr. Oosterhout has taken the same model that the CRI has used to calculate extinction risk, the Dennis Model, and calculated the expected time to extinction using more commonly used quasi-extinction thresholds. As you can see, the times change dramatically when different values are used. And just a point to bring the world of models to the world of fish, the two asterisked stocks on the table, Marsh and Sulphur, are already extinct by the CRI definition, having had zero returns in 1999.

In contrast to the CRI science, we are also entering into the record a study by one of the region's foremost salmon scientists, Dr. Phil Mundy, that projects that, if conditions remain the same, Snake River Spring/Summer chinook will be functionally extinct by the year 2017. Given the recent spawning ground counts, Dr. Mundy's projections seem to be far more accurate than those of the CRI.

Actually, the prospect for extinction is even gloomier than that table, as the CRI manipulated the data in other ways that lead to more optimistic projections. These manipulations are documented in the 7 Questions document we have presented.

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The point is not that the CRI got it wrong; the point is that the agencies making this decision and the citizens of the Northwest deserve the best scientific and economic information available. We call on NMFS to respond to these 7 questions and to make public the results. We also call on the federal family to correct any of the analysis of the alternatives that is based on this faulty science.

Thank you.



## Trout Unlimited Position Statement

### **Written Comments to Corps of Engineers Draft Juvenile Salmon Migration Feasibility Report and Federal Caucus All-H Paper**

In 1996, a group of independent scientists were enlisted by the Northwest Power Planning Council to review and synthesize the science underlying the Council's fish and wildlife program. The culmination of this process resulted in a landmark publication entitled "Return to the River." While there are a number of important revelations contained in the report, perhaps the most important is that the restoration of Columbia River salmon and steelhead depended on increasing "normative" conditions throughout the basin. This does not mean removing all dams, eliminating industry, or returning the basin to pre-development conditions. However, it does involve the Pacific Northwest region taking meaningful steps to ensure the restoration of ecological processes consistent with native fish needs.

For Snake River salmon and steelhead, the time to deliver is now. Backed against the wall for much of the previous century, these fish are in their final hour. A trip to any headwater tributary of the Middle Fork of the Salmon River in Central Idaho could provide a much needed reality check for policy-makers in the region regarding the status of Snake River spring/summer chinook salmon. In the middle of the immense Frank Church River of No Return Wilderness Area, amidst old-growth forests, healthy populations of resident native westslope cutthroat and bull trout, and all the incomprehensibly complex workings of a comparatively pristine watershed, there is little evidence of spring/summer chinook spawning. A recent Trout Unlimited study found that Snake River spring/summer chinook could be functionally extinct by as early as 2017 without dramatic and decisive remedial actions.

The federal government, responsible for developing and implementing a scientifically defensible recovery plan for these fish, has not done so. The latest incarnation of Snake River salmon and steelhead recovery – where once again the status quo is preserved at the expense of the fish – is contained in the two draft reports released by the U.S. Army Corps of Engineers and the Federal Caucus. The Anadromous Fish Appendix and All-H paper discount years of multi-agency federal, state, and tribal (collectively known as PATH) efforts to analyze various hydropower alternatives in terms of the likelihood of meeting specific survival and recovery standards. Instead, the federal government has chosen to focus on what is necessary to merely avoid extinction, instead of corrective measures that will ensure species recovery.

The latest federal modeling (CRI) efforts, which will largely guide future federal policy decisions, focus on a multitude of hydropower, habitat, harvest, and hatchery measures and judge effectiveness only in terms of extinction avoidance. Further, a recent

Trout Unlimited-sponsored study highlights the deficiencies of the NMFS modeling efforts. The bottom line is that the federal government's latest Snake River salmon restoration reports do not identify any single action or suite of actions, other than dam breaching, that is likely to recover naturally sustaining runs. Attempts by NMFS to find a more scientifically defensible and politically palatable solution fail miserably. Trout Unlimited is not alone in this conclusion; 200 of the most respected fisheries scientists in the region, the United States Fish and Wildlife Service, the Idaho Department of Fish and Game, and the Western Division of the American Fisheries Society have all concluded that the case for dam removal, from a scientific standpoint, has been made.

3 The recent Corp's draft EIS' economic reports are also deficient. The Drawdown Regional Economic Workgroup (DREW) conclusions underestimate the positive impacts and overestimate the negatives of removing the dams. A recent Trout Unlimited-sponsored critique by ECONorthwest emphasized that the DREW studies wrongly discount the importance of creating new jobs in more stable and less natural resource dependent industries, don't fully incorporate or recognize the enormous quality-of-life benefits from a free-flowing lower Snake River, and under-value the importance of salmon and steelhead to Native American tribes for ceremonial, subsistence, and religious purposes. In sum, the costs and foregone benefits of not restoring a free-flowing lower Snake River have not been accurately reported in the Corp's economic documents.

In light of the monumental nature of the decision at hand, and the extinction risk posed to Snake River salmon and steelhead, the region deserves the best information available in order to honestly evaluate the various alternatives. Viewed in this light, the Corp's DEIS and All-H documents are non-starters. Trout Unlimited argues that the federal approach constitutes yesterday's news - that we can have our cake and eat it too, that we can tweak the system one more time when, as a federal judge recently noted, the system cries out for a major overhaul. Thirty years and billions dollars dedicated to techno-fixes simply have not worked. This time, for Snake River salmon and steelhead, we aren't buying it.

In 1975, amidst the pomp and circumstance over the completion of Lower Granite Dam and the opening of Lewiston as an inland sea port, then-Governor of Idaho Cecil Andrus uttered some somber and in retrospect fateful words. The Governor declared that "before I accept this structure, I want to point out that the cost of this system has been horrendous, both in terms of dollars and in cost to our natural resources." Time has proven Governor Andrus correct, and the costs have since risen to include extinction. The lower Snake River navigation and hydroelectric system was built on the backs of native salmon and steelhead, and they have yet to recover. It is time for the federal government to fulfill their legal mandates and call for the removal of the four lower Snake River dams to ensure the continue existence of these magnificent fish.