

***Alaska Trollers Association ♦ American Rivers ♦ American Whitewater
Association of Northwest Steelheaders ♦ Center for Environmental Law and Policy
Coastal Trollers Association ♦ Columbia Riverkeeper ♦ Conservation Northwest
Defenders of Wildlife ♦ Endangered Species Coalition ♦ Friends of the Clearwater
Hells Canyon Preservation Council ♦ Idaho Conservation League ♦ Idaho Rivers United
Idaho Wildlife Federation ♦ Institute for Fisheries Resources ♦ National Wildlife Federation
Natural Resources Defense Council ♦ NW Energy Coalition
Northwest Sportfishing Industry Association ♦ Orca Network
Oregon Natural Desert Association ♦ Pacific Coast Federation of Fishermen's Associations
Pacific Rivers ♦ Save Our wild Salmon Coalition ♦ Sierra Club ♦ Snake Riverkeeper
Spokane Falls Chapter of Trout Unlimited ♦ Spokane Riverkeeper ♦ The Lands Council
WaterWatch of Oregon ♦ Wild Steelhead Coalition ♦ Whale Dolphin Conservation***

August 30, 2016

Elliot Mainzer, Administrator
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Scott A. Spellmon, Commander Brigadier General
U. S. Army Corps of Engineers, Portland District
P.O. Box 2946
Portland, OR 97208-2946

Lorri Lee, Pacific Northwest Regional Director
Bureau of Reclamation
Pacific Northwest Regional Office
1150 North Curtis Road, Suite 100
Boise, Idaho 83706-1234

Dear Administrator Mainzer, Commander Brigadier General Spellmon, and Regional Director Lee,

We write regarding your agencies' plans for scoping for a comprehensive environmental impact statement (EIS) under the National Environmental Policy Act (NEPA) to address the environmental impact and alternatives for managing and operating federal dams on the Columbia and Snake Rivers. Pursuant to the U.S. District Court's decision and remand order in *National Wildlife Federation v. National Marine Fisheries Service*, No. 01-640-SI (D. Or. 2016), NEPA scoping must be completed by September 30, 2017. A draft EIS, however, is not due until March 27, 2020.

We recently learned that your agencies are considering a plan to publish a scoping notice in the Federal Register by the end of September and to potentially conduct the public comment and hearing process during the November election and over the December holidays. We strongly support a rigorous and timely NEPA review. We are, however, concerned that the proposed scoping process timeline would fall over—what is for us, our members, and many members of the public—the busiest time of year.

We recognize that the plaintiffs in *NWF v. NMFS* proposed NEPA scoping this fall as part of an expedited, three-year schedule that the Court did not adopt in favor of a longer five-year schedule. Given this longer schedule, we see no reason to push forward with scoping this fall unless you are willing to commit to the 3-year time frame.

Our organizations represent a diversity of interests and stakeholders that range from fishermen and business leaders to environmental advocates and scientific and energy experts. We offer important perspectives on the management of the Columbia and Snake River dams, and we are personally and professionally invested in this NEPA process. Indeed, many of our members have spent years studying, advocating for, and working alongside the Columbia and Snake River ecosystems.

Our ask is simple—to be given a meaningful opportunity to participate in the scoping process. **Specifically, we request that you not schedule public comment and hearings for this process over the election and holidays. Instead we ask that - regardless of when you initiate the scoping process - you schedule a public comment period of no less than 90 days that includes a series of public hearings throughout the region to commence in January 2017.**

We share the sense of urgency and time-sensitive need to review the environmental impacts of the Columbia and Snake River federal dams in order to inform a lawful plan that protects endangered wild salmon and steelhead. However, we do not support sacrificing quality review and meaningful participation for administrative expedience—and we believe *no such sacrifice is necessary here*. The 5 year timeline the court provided for NEPA review affords ample time for the agencies to invite and consider full and robust public participation by interested parties in the region.

We believe the Court's *NWF v. NMFS* decision presents a unique and critical opportunity for your agencies to take a fresh approach to developing a plan for configuration and operation of the dams on the Columbia and Snake Rivers, one that is based on the best available scientific and economic information, follows the law, and fully and transparently considers all reasonable alternatives, including bypassing the four dams on the lower Snake River. A key part of this opportunity is the NEPA process the Court has ordered your agencies to pursue. And the first step in that process is to allow a full and fair scoping opportunity consistent with the overall NEPA schedule, not one that could limit meaningful public participation.

We look forward to hearing from you soon and hope that you will grant our request that you schedule public comment and hearings for scoping for an EIS to begin after the 2016 election and holiday season, in January 2017.

Sincerely,

Joseph Bogaard, Executive Director

Save Our wild Salmon Coalition

Seattle, WA

Dan Ritzman, Regional Director

Sierra Club

Seattle, OR

Giulia Good-Stefani, Staff Attorney

Natural Resources Defense Council

Hood River, OR

Tom France, Regional Executive Director

National Wildlife Federation

Missoula, MT

Shawn Cantrell, Northwest Regional Director

Defenders of Wildlife

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Liz Hamilton, Executive Director

Northwest Sportfishing Industry Association

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Glen Spain, Regional Director

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