I am writing in regard to the 2021 draft of the NW Power Plan. The plan authorized Idaho, Montana, Oregon, and Washington to develop a regional power plan with fish and wildlife programs to balance the Northwest’s environmental and energy needs.

The 4 Lower Snake River Dams (LSRDs) are among the biggest obstacles to recovering salmon. Scientific studies have repeatedly shown that breaching the 4 LSRDs would yield the biggest returns for wild fish, compared to other potential restoration actions.   
  
The LSRDs’ electricity generation contributes minimally to NW supplies (about 4% of the region’s available energy), and mostly in spring, when demand is lowest and other hydropower supplies are plentiful. Economic studies show that breaching the dams would save taxpayer money AND lower electrical rates for NW electrical customers.

While industry marketing calls hydropower “clean and green,” and “carbon-free,” the reality is that these large industrial developments have significant drawbacks. In addition to causing severe salmon decline, dam equipment, such as turbines, uses oil in operations, and at times spills sizeable amounts of oil into the Columbia/Snake Rivers. Oil pollution is bad for salmon and us! Moreover, the warm, stagnant reservoirs behind the LSRDs in particular, emit significant amounts of methane, a potent greenhouse gas. This is also not good for salmon.

The impacts of dam removal on the Lower Snake need to be analyzed for the power that would be lost in the next 20 years. These findings need to be made transparent, and use science-based evidence so the public is made aware of this data. The Northwest Power Act requires that a power plan …”must perform an analysis of reserve and reliability requirements and cost-effective methods of providing reserves designed to insure adequate electric powerat the lowest probable cost." Consequently, the NPCC is requiredto have an analysis that indicates the "lowest probable cost".

Furthermore, economic studies, including the 2020 Columbia River Systems Operations Environmental Impact Study, have found that not having the 4 Lower Snake River Dams’ energy production would decrease electrical rates. See Table 7-3 of Chapter 7, MO3, [essentially Lower Snake dam breaching], which provides:

-Capital Costs go down 13%

-Operations and Maintenance costs go down 16%

-Fish & Wildlife costs go down 29%

These are significant cost savings from LSRD breaching that this draft Power Plan improperly fails to analyze. The Draft 2021 Plan currently states that the NPCC refuses to “analyze the effects of the retirement of Snake River power plants for this power plan." The reason given is "Producing just an estimate of replacement costs and not a comprehensive estimate of removal is likely to be taken out of context."

Ratepayers and residents in the NW deserve accurate data about the true costs and benefits of the 4 Lower Snake River Dams, at the center of our foremost environmental and tribal rights issues in the region.

Furthermore, the NPCC's Draft is looking at decommissioning coal plants that do not haveretirement dates. Just because the LSRDs do not yet have a firm retirement date, that is no excuse to avoid this analysis here, where clear momentum is heading towards their decommissioning.

Elected officials including WA Gov. Inslee and WA Sen. Murray, are supporting further studies of breaching the 4 LSRDs. Other officials including OR Gov. Brown and U.S. Reps Simpson (ID) and Blumenauer (OR) are actively supporting LSRD breaching. Tribal governments and people are unanimously calling for the LSRDs to be breached, as are many conservation organizations and concerned citizens.

Decarbonization is not the only consideration in getting a cleaner energy supply. We also need to reduce other forms of greenhouse gas emissions, like methane, and look at restoring biodiversity such as native vegetation, for carbon capture. The reservoirs behind the LSRDs emit significant amounts of methane. See June 1, 2021 WSU study at [Greenhouse gas emissions from reservoirs higher than previously expected -- ScienceDaily](https://www.sciencedaily.com/releases/2021/06/210601100642.htm)