

*Alaska Longline Fishermen's Association ♦ American Rivers
American Whitewater ♦ Association of Northwest Steelheaders ♦ Audubon Society of Portland
Coastal Trollers Association ♦ Columbia Riverkeeper ♦ Defenders of Wildlife
Earth Ministry ♦ Earthjustice ♦ Endangered Species Coalition ♦ Friends of the Clearwater
Fly Fishers International ♦ Greater Hells Canyon Council
Idaho Conservation League ♦ Idaho Rivers United ♦ National Wildlife Federation
Natural Resources Defense Council ♦ Northwest Guides and Anglers Association
Northwest Sportfishing Industry Association ♦ Orca Conservancy ♦ Pacific Rivers
Save Our wild Salmon Coalition ♦ Sierra Club ♦ The Lands Council
Washington Wildlife Federation ♦ Wild Steelhead Coalition*

March 17, 2020

D. Peter Helmlinger, P.E.
Brigadier General,
Army Corps of Engineers
U.S. Army

Lorri Gray, Regional Director,
Columbia-Pacific Northwest
Bureau of Reclamation
U.S. Department of the Interior

Elliot Mainzer, Administrator and CEO
Bonneville Power Administration
U.S. Department of Energy

Dear Brigadier General Helmlinger, Regional Director Gray and Administrator Mainzer:

We are writing to again request that you extend the public comment deadline for the Columbia River System Operations Draft Environmental Impact Statement (CRSO DEIS) well beyond the current deadline of April 13, 2020, in light of the rapidly evolving and escalating national health emergency triggered by the Coronavirus Disease-2019 (COVID-19).

We previously requested such an extension in a March 5th letter because a 45-day comment period is far too short for adequate public review and comment on a DEIS that runs to nearly 8,000 pages, especially for issues of major regional and national significance. In that letter we also provided additional reasons to extend the comment period to at least 120 days, including past statements from your own agencies that a comment period much longer than 45 days would be required. Since that letter, the COVID-19 crisis has erupted into an unprecedented national health threat.

Indeed, in a March 11th letter we urged you to cancel the public hearings you had announced for comment on the CRSO DEIS due to the public health risk of COVID-19, a step you have now appropriately taken and that we appreciate. We continue to believe, however, that the teleconferences are an inadequate substitute—particularly given the unique set of challenges confronting individuals at this time—for public hearings. We still urge you to cancel and replace them with public hearings scheduled at a later date.

Since March 11th, the COVID-19 situation has continued to escalate dramatically from day-to-day in our region and across the country. The urgent need to substantially extend the comment period has grown correspondingly. At this time, most public facilities are closed, nearly all work places have severely limited access, and schools in 29 states (including Washington, Oregon, and Montana) are closed. Our members, our staff, scientists, economic experts, local businesses, fishermen, farmers, tribal members, and many others whose lives may be significantly impacted by decisions considered in the CRSO DEIS are grappling with the unfolding crisis. Their lives are and will continue to be substantially disrupted, and their full attention is properly focused on the health of themselves and their families. Under these circumstances, it would be arbitrary and irrational to ignore this reality and persist with only a 45-day comment period.

In closing, we urge you to announce a substantial extension of the public comment period and other steps as noted above as soon as possible in order to allow all parties interested in the future of salmon, communities and our region's energy system to have an adequate and meaningful opportunity to review and comment on the CRSO DEIS.

Sincerely,

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CC:
Council on Environmental Quality
Northwest Governors
Northwest Congressional Delegation