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July 18, 2025

Maryalice Fischer
Certification Program Director
Low Impact Hydropower Institute
68 Harrison Ave Ste 605 PMB
Boston, Massachusetts 02111-1929

RE: Low Impact Hydropower Institute's Pending Certification of Douglas
County Public Utility District's Wells Dam Hydroelectric Project

Dear Ms. Fischer,

These comments are submitted on behalf of the *Save Our wild Salmon Coalition (SOS)*. SOS is a coalition of over 50 Northwest and national conservation organizations, recreational and commercial fishing associations, businesses, clean energy organizations, and orca and river advocates. Our mission is to protect and restore abundant, self-sustaining populations of salmon and steelhead to the Columbia-Snake River Basin for the benefit of freshwater and marine ecosystems, and Northwest communities and our region's special ways of life.

We appreciate the Low Impact Hydropower Institute's (LIHI) decision to open a second comment period for the pending certification of Douglas County Public Utility District's Wells Hydroelectric Project. This is a welcome indication that the Institute recognizes the gravity of the issues raised by the application and the inadequacy of the original notice of the pending certification.

We have joined other non-governmental organizations in signing a comment letter led by *Columbia Riverkeeper*. We wholeheartedly support those extensive comments.

When SOS staff first learned of this application, our immediate reaction was that *no mainstem dam on the Columbia River can possibly be characterized as "low impact"*. Submerging more than twenty miles of Columbia River channel and riparian shoreline (and pushing slackwater a mile up the Methow River) seems, on the face of it, high impact. This is doubly true when the waters below and above the dam support imperiled, ESA-listed populations of salmon and steelhead. That immediate reaction continues to be our fundamental conclusion.

Alaska Trollers Association

American Rivers

American Whitewater

Backbone Campaign

Association of Northwest Steelheaders

Boulder-White Clouds Council

Coastal Trollers Association

Columbia Riverkeeper

Conservation Northwest

Defenders of Wildlife

Earthjustice

Earth Ministry

Ecoflight

Endangered Species Coalition

Environment Washington

Fly Fishers International

Friends of the Clearwater

Greater Hells Canyon Council

Idaho Conservation League

Idaho Rivers United

Idaho Wildlife Federation

Institute for Fisheries Resources

Intercommunity Peace and Justice Center

The Lands Council

Lighthawk

National Parks Conservation Association

National Wildlife Federation

Natural Resources Defense Council

Nimiipuu Protecting the Environment

North Cascades Conservation Council

Northwest Sportfishing Industry Association

NW Energy Coalition

NW Guides and Anglers Association

Oceana

Orca Conservancy

Orca Network

Oregon Natural Desert Association

Oregon Wild

Pacific Coast Federation of Fishermen's Ass'ns

Pacific Rivers

Sierra Club

Washington Kayak Club

Washington Trollers Association

Washington Wild

Washington Wildlife Federation

WaterWatch of Oregon

Whale Scout

Wild Steelhead Coalition

Willamette Riverkeeper

In addition to this bottom-line recommendation, we also note the Yakama Nation's comments suggest that the project fails to meet multiple LIHI eligibility criteria.

An additional concern is the precedential impact of certification of Wells Dam as low impact. If Douglas PUD were to succeed in its application, Chelan PUD and Grant PUD seem highly likely to follow suit and seek low-impact certification for Rocky Reach, Rock Island, Wanapum, and Priest Rapids dams. However one might assess the impact of a single dam, the cumulative impacts of a succession of five dams and their associated reservoirs on the Columbia River mainstem is surely not "low".

We are also surprised and disappointed that LIHI appears to misunderstand, and/or undervalue, the concerns of Northwest Tribes over the grave and continuing impacts that Wells Dam and the host of other dams and reservoirs in the Columbia River and its tributaries have had on tribal cultures, sustenance, and economies. We encourage the LIHI staff to, as the Columbia Riverkeeper-led letter also suggests, read the *Tribal Circumstances Analysis: Historic and Ongoing Impacts of Federal Dams on the Columbia River Basin Tribes* before it makes its final decision on this and other "low impact" determinations for dams and reservoirs in the Columbia Basin and elsewhere in the Pacific Northwest. Published by the United States Department of Interior in June 2024, this important report carefully documents the historic, ongoing, and cumulative impacts of federal Columbia River dams on Columbia River Basin Tribes and provides recommendations for how the federal government can uphold its trust responsibilities to the Basin Tribes by acknowledging and addressing these impacts with future actions.

LIHI should deny Douglas PUD's application for certification of Wells Dam as a low-impact hydropower project. We appreciate your consideration of our comments and encourage you to contact us if you have questions or if we can assist further in any way.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Joseph", with a stylized flourish at the end.

Joseph Bogaard, Executive Director
Save Our wild Salmon Coalition