July 20, 2025
Maryalice Fischer, Certification Program Director
Low Impact Hydropower Institute
68 Harrison Ave Ste 605
PMB 113938
Boston, Massachusetts 02111-1929

RE: Wells Dam Project Certification Comments

Dear Ms. Fischer:

Thank you for the opportunity for Trout Unlimited (TU) to provide comments and feedback on the Low Impact Hydropower Institute (LIHI) certification application submitted by Public Utility District No. 1 of Douglas County (DPUD). To the best of our knowledge, Wells Dam is the first hydroelectric dam in the Columbia River to apply for a LIHI certification. While we are supportive of public and private utilities that operate hydroelectric dams, while working to improve operations and conditions for aquatic species(such as steelhead and salmon)and the ecosystems they rely on, we believe that a LIHI certification for any dam within the Columbia River basin could set a concerning precedent and the decision to do so should be done with a high level of scrutiny and require additional mitigation actions.

With over 300,000 members and supporters – including 5,000 members in the state of Washington—and over 250 staff, TU is the nation's largest cold-water fisheries conservation organization dedicated to the conservation, protection, and restoration of our nation's trout, steelhead, and salmon resources and their watersheds. Our strength is derived from our grassroots members and volunteers working together with our staff toward the common goal of ensuring resilient fish populations for future generations. TU is dedicated to using the best available science to guide our efforts, and we have the benefit of applying the expertise of our fisheries scientists to support policy and science efforts requiring careful analysis.

Our professional staff in the Columbia River Basin work toward our mission to conserve, protect, and restore North America's cold-water fisheries and their watersheds, ensuring robust populations of native and wild cold-water fish for future generations. Both the Methow and Okanogan River basins are identified in TU's strategic roadmap as Priority Waters, which are

basins where we are directing our energies to care for and recover wild and native trout, steelhead, and salmon watersheds.

Salmon and steelhead populations in the Upper Columbia River basin have declined significantly over the past 150 years, and both spring Chinook Salmon and summer Steelhead are currently listed as Endangered under the Endangered Species Act (ESA), while Summer/ Fall Chinook and Bull Trout are listed as Threatened. Salmon and steelhead populations in the upper Columbia River basin have declined significantly over the past 150 years, and both spring Chinook Salmon and Summer Steelhead are currently listed as Endangered under the Endangered Species Act (ESA), while Summer/Fall Chinook and Bull Trout are listed as Threatened. While recovery efforts are underway for these populations, including those funded by Douglas County PUD, some of the lowest returns of spring Chinook and summer steelhead on record have occurred over the past decade, as the National Marine Fisheries Service concluded in its most recent five-year status review[1].

For example, the Methow River has a minimum abundance goal of 1,000 natural-origin steelhead spawners and the Okanogan River has a minimum abundance goal of 500 natural-origin steelhead spawners, but between 2020 and 2024 the average number of natural-origin steelhead spawners in the Methow River was only 520 fish and in the Okanogan, it was just 167 fish. Spring Chinook are faring far worse; while they have a minimum natural-origin spawn abundance target of 2,000 fish, between 2019 and 2023, an average of only 355 spawners were reported in the Methow River (WDFW SCoRE). Not only are these populations at critically low levels, but they are continuing to decline and failing to show signs of recovery.

While it is important to acknowledge that no single factor can be attributed as the cause of salmon and steelhead declines in the Upper Columbia basin, the operation of hydropower projects, such as Wells Dam, is documented as one of the significant factors impacting the survival of salmon and steelhead populations. These impacts include loss of habitat, impaired migration, increased predation, and reduced survival for fish passing upstream and downstream of the dams. These factors are not unique to Wells Dam but are impacts shared by all dams on the mainstem Columbia and Snake River basins. While some operations work to mitigate impacts on salmon and steelhead populations, negative impacts are still inevitable, such as those documented in the comments provided by Washington Department of Fish and Wildlife (WDFW) and Yakama Nation. These impacts add to the challenge of recovering impaired populations of salmon and steelhead.

[1] NMFS 2022 status review for listed Upper Columbia River anadromous salmonids.

We also believe that meeting ESA standards and thresholds, which are aimed at avoiding extinction and jeopardy, are insufficient to warrant the label of "low impact". Instead, the "low impact" designation should be reserved for projects that have a goal and are on track toward healthy and harvestable abundances. The Columbia Basin Partnership[2], of which Trout Unlimited was a member, developed low-, medium-, and high-abundance thresholds that would provide a far more suitable framework to measure whether a project is on track to be designated as "low impact".

This dynamic presents a challenge when considering whether any facility in the Columbia Basin should qualify for certification as a "low impact" facility. The impacts of hydro projects on both listed and non-listed fish in the Columbia River are complex, and it does not appear to Trout Unlimited that the LIHI review or certification process is sufficient to account for the full range of impacts. This poses a significant challenge in considering whether any mainstem facility in the Columbia Basin should qualify for such a certification.

While we don't believe the current application and operation is worthy of a LIHI certification, we do believe this provides an opportunity for DPUD to develop, formalize, and adopt an Adaptive Management Plan that supports the Habitat Conservation Plan (HCP) efforts, supports recovery of ESA-listed steelhead, and ultimately aims to return salmon to healthy and harvestable abundances by addressing all limiting factors in a structured decision-making framework. This recommendation is also a condition supported by WDFW, Yakama Nation, and Columbia River Inter-Tribal Fish Commission (CRITFC) Adaptive Management Plan in their letter to LIHI, dated March 12, 2025. We believe that by adopting an effort like this, which aims to fully integrate and adaptively manage recovery actions, DPUD and their Wells Dam operation would be on a pathway that can set them apart from other hydroelectric dams in the Columbia River basin. We also believe that such actions would put DPUD on a course that could warrant a LIHI certification in the future.

In the March 12, 2025, letter referenced above, there are nine other Proposed Conditions put forth that we support and believe could improve the outlook and status trends for the ESA-listed species that are impacted by this project. Specifically, Proposed Conditions 1 – 5, 9, and 10.

Additionally, we support the technical review and concerns provided by WDFW's July 17, 2025 supplemental comments regarding the adherence of select criteria from the Low Impact Hydropower Institute Certification Handbook, 2nd Edition, specifically the concerns around

[2] Columbia Basin Partnership Task Force. 2020. Phase 2 report of the Columbia Basin Partnership Task Force of the Marine Fisheries Advisory Committee. NOAA Fisheries West Coast Region, Portland Oregon.

Upstream and Downstream Fish Passage and the Threatened and Endangered Species criteria around downstream overshoot steelhead. The overshoot steelhead issue is something we as an organization have been tracking, as described in three of our Wild Steelheaders United/Trout Unlimited blog posts (here, here, and here).

We appreciate the information DPUD has provided during this certification application process, both in their application and in response to the comments provided that raise concerns with certification. It is our belief that while a certification is presently not warranted, we do feel there is a pathway toward certification that would set DPUD and Wells Dam apart from other Columbia Basin hydropower projects, by adopting structured decision-making process that integrates recovery actions in a highly functional adaptive management framework to stem the decline of listed Spring Chinook and Summer Steelhead.

We hope that DPUD can benefit from the recommendations and considerations provided by us and other commenting parties throughout this process as they work to improve conditions and operations for fish. We understand that some of these requests are above what a LIHI certification requires, but this should be seen as an opportunity to fully engage with all parties and work toward not just recovery, but healthy and harvestable abundances of salmon and steelhead in the upper Columbia Basin.

We appreciate the opportunity to provide comments and consideration of our concerns. Please reach out to Jonathan Stumpf at jonathan.stumpf@tu.org or Gary Marston at gary.marston@tu.org with any questions.

Sincerely,

Jonathan Stumpf
Senior Manager, Wild Steelhead Initiative

Gary Marston
Science Advisor, Wild Steelhead Initiative