



January 23, 2020

LSRD Stakeholder Engagement Draft Report
c/o Tess Wendel
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Seattle, WA 98101

Via email to info@lsrdstakeholderprocess.org

I am pleased to submit these comments on behalf of the Pacific Northwest Waterways Association, a non-profit, non-partisan trade association of ports, businesses, public agencies and individuals who support navigation, energy, trade and economic development throughout the Pacific Northwest.

The Lower Snake River Dams Stakeholder Process commissioned by the Washington State Governor's Office and funded by the State Legislature was one of the more controversial recommendations from the Southern Resident Killer Whale Task Force. It did not have the group's unanimous support.

The Washington taxpayer funding that has now been spent on this process could have gone toward activities and projects that directly benefit orcas and the salmon that make up their prey. Instead, it yielded a draft report that tells us what we already know: a description of the river, followed by a survey of opinions, feelings and beliefs about Snake River dam breaching. This is the opposite of science-based salmon and orca recovery, and it is difficult to see how this product will contribute to the knowledge base with regard to these species. It is also alarming to see so much funding and attention devoted to one small part of the Southern Resident Killer Whales' prey base, especially when ocean conditions, contaminants, and other Chinook fish runs are likely much more impactful to the survival of these three pods.

Federal agencies are already studying salmon and the river system and will have a draft report for the region to review in February. This Columbia River System Operations Environmental Impact Statement is based in science, complies with National Environmental Policy Act, and includes opportunities for citizen review as well as significant collaboration with cooperating agencies like Northwest tribes and states – including the State of Washington. The CRSO EIS will include an evaluation of the Snake River dams, including an economic impact analysis with stakeholder input.

Each Snake River dam has a navigation lock that allows cargo to move by water. The Snake River has had remarkably stable tonnage levels in the past 10 years. In 2017 alone, over 3.5 million tons of cargo were barged on the Snake River. It would have taken over 35,140 rail cars to carry this cargo, or over 135,000 semi-trucks. The Snake River is particularly important to our Northwest wheat farmers. The Snake River dams make it possible for nearly 10% of all U.S. wheat exports to move in the safest, lowest emission type of cargo transportation – barging.

The federal navigation channel on the Snake River also makes it possible for a robust cruise industry to thrive. Cruise boat demand has steadily increased over the last ten years and represents a growing market in the region. Each summer, thousands of passengers enjoy the Columbia and Snake River on vessels that travel the 325 river miles between Vancouver and Clarkston. Over 18,000 passengers visited in 2017 and contributed over \$15M to communities along the two rivers.

Hydropower is a reliable, renewable domestic power source that produces no greenhouse gas emissions and provides nearly 60% of our region's electricity. The Snake River dams are key contributors to the Northwest energy profile, and make it possible for intermittent renewables like wind and solar to integrate into our system. The lower Snake River dams are some of the most reliable and lowest-cost electricity sources of the 31 federal dams from which the Bonneville Power Administration markets power.

Salmon recovery in the Pacific Northwest is a collaborative effort by federal and state agencies, tribes, utilities, and countless other entities. Together we all work to address the many ways a salmon's life cycle can be affected by humans: hydropower, hatcheries, habitat, and harvest. Ocean conditions also play a major role in salmon health, in addition to significant impact from predators like birds, sea lions, and other fish. Major improvements have been made in fish ladders, dam design, optimized river flow and habitat restoration, resulting in steady improvements to salmon runs. Juvenile fish survival rates past each of the eight federal dams are now between 95 and 98 percent, yet we know that significant challenges exist for our salmon runs elsewhere in their journey. A single-minded focus on four dams that have the latest in fish passage technology ignores the many other threats to anadromous fish runs.

As conversations continue in the region and the federal study process moves forward, PNWA's members will continue to support clean renewable hydropower, efficient barge transportation, and science-based salmon recovery.

Sincerely,

A handwritten signature in black ink that reads "Kristin Meira". The script is cursive and fluid.

Kristin Meira
Executive Director