

March 23, 2021

The Honorable Mike Simpson
United States House of Representatives
2084 Rayburn House Office Building
Washington, DC 20515

Dear Representative Simpson,

We are a diverse group of stakeholders of the integrated Columbia Snake River System of dams and navigation locks that provide hydropower, transportation, irrigation, flood control, and recreation in the interior Pacific Northwest. The use and management of this remarkably important system impacts the lives of millions of Americans throughout our region.

We write today to raise our serious concerns with your recent proposal to breach the four Lower Snake River dams and provide compensatory and reconstruction funding to those who rely upon their benefits, which we understand comes with a \$34 billion price tag. The four lock and dam facilities on the Lower Snake River between Washington's Tri-Cities and Lewiston, Idaho were authorized by Congress in 1945 and are foundational to the Pacific Northwest economy. They enable clean and reliable power generation, irrigation of some of America's most productive farmland, and safe and efficient marine transportation of agricultural products to global markets.

Your stated objective is to restore populations of endangered wild salmon and steelhead to Idaho's rivers and end litigation on these matters. These are important and admirable goals, but we believe the proposal will have long-lasting impacts on Northwest communities without any assurance that Idaho runs will be restored. Furthermore, we do not believe that this proposal meets the standard voiced by all four Senators from Washington and Oregon that "any process needs to balance the needs of communities in the Columbia River Basin, be transparent, be driven by stakeholders and follow the science." There was no public process to formulate these concepts, which would require significant study before becoming ripe for federal legislative consideration.

We must emphasize that our procedural concerns are eclipsed by substantive ones. Though certainly well-intentioned, this proposal would set the Northwest on a path toward higher emissions, less energy certainty, and a continued narrow focus on four dams with outstanding fish passage.

Multiple reasons for West Coast fish declines

National Oceanic and Atmospheric Administration (NOAA) has listed 13 populations of Columbia River Basin salmon and steelhead as "endangered" or "threatened" under the Endangered Species Act. Only four of these populations migrate in the Snake River. There are also numerous salmon runs in crisis in Puget Sound, Hood Canal, southeast Alaska, and British Columbia. Several of those populations migrate in free-flowing rivers, yet their numbers have plummeted as well.

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Scientists have identified many causes of diminishing West Coast fish populations. Salmon and steelhead spend most of their lifecycle feeding in the Pacific Ocean before migrating back upstream as adults. NOAA studies continue to show that ocean conditions are the consistent factor affecting salmon runs across the entire West Coast, even for free-flowing rivers such as the Elwha and Nooksack Rivers in Northwest Washington state, which have no dams. Climate change is warming and acidifying ocean waters and changing fish habitat, food sources, and predator patterns up and down the West Coast. From Alaska to California, salmon numbers are declining again after nearly a decade of recovery.

The Snake River dams are “run-of-river” and do not block fish. In fact, each of the four Lower Snake River dams provides over 95% effective fish passage. While we share Representative Simpson’s concerns about poor smolt-to-adult returns (SARs) for the Snake River, there is no scientific evidence that breaching the lower Snake River dams will address that problem in a meaningful way. Dam breaching advocates often use the John Day and Yakima rivers as points of comparison, because they have higher observed SARs for spring Chinook and steelhead and, coincidentally, where salmon don’t have to pass through as many dams. However, this argument ignores the fact that the Cle Elum River is similarly situated, but has poorer SARs than the Snake River. It also ignores the fact that Yakima and John Day rivers have poorer fall Chinook SARs than the lower Snake River. Finally, it ignores the fact that, with the exception of a few outliers, SARs have declined almost uniformly for the entire Pacific Coast, from Northern California to Southeast Alaska.

Finally, it should be noted that the State of Idaho has established an allowable river temperature limit that is 2° Celsius greater than the State of Washington’s limit for the Snake River. This means that the temperature of water arriving from Idaho is often higher than the maximum temperature that Washington has deemed safe for migrating salmon. The U.S. Environmental Protection Agency’s recent Total Maximum Daily Load noted this, finding that water temperatures entering Washington from Idaho often significantly exceeded the Washington State Department of Ecology’s water quality standards by a substantial margin from July through September. These upstream temperature exceedances mean that even if the Lower Snake River dams did not exist, Washington’s water quality standards would regularly go unmet due to warm water arriving from Idaho.

The Lower Snake River dams are critical assets for Bonneville Power Administration

The Lower Snake River dams are a critical part of the region’s energy portfolio, and were comprehensively evaluated in the Columbia River System Operations environmental impact statement (CRSO EIS). Hydropower generation would decrease by 1,100 average megawatts (aMW) from breaching the four lower Snake River dams under average water conditions. Additionally, the lower Snake River projects provide more than 2,000 MW of sustained peaking capabilities during the winter, and a quarter of the federal power system’s current reserves holding capability. The dams play an important role in maintaining reliability in the production of power used to supply load in the Pacific Northwest. Their flexibility and dispatchability are valuable components of the Northwest power portfolio, and breaching would more than double the region’s risk of power shortages. The CRSO EIS evaluated sources of firm power that could replace hydropower at the Snake River dams, like gas, coal and nuclear. The agencies noted that 1,120 MW of combined cycle natural gas turbines at an overall cost of about \$250 million a year would be required.

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For Bonneville's wholesale power rate, the dam breaching alternative in the CRSO EIS would place upward pressure on BPA rates of between 8.2% and 9.6%, depending upon whether Bonneville or regional utilities fund these new resources. However, due to the region's carbon reduction goals, it is much more likely that the replacement resources would be a carbon-free mix of wind, solar, and batteries. BPA has estimated that such a mix would cost the region \$16 billion over a 20-year span, raising its wholesale rates by 50% and the average public power customer's electricity bills by 25%.

Mothballing the clean federal energy sources we need to maintain reliable, carbon-free electricity is also at odds with national policy. The recently released National Academy of Sciences report on achieving net zero carbon emissions by 2050 stated "the nation needs to double the share of electricity generated by non-carbon emitting sources to at least 75%. This will require deploying record-setting levels of solar and wind technologies, scaling back coal and some gas-fired power plants, and preserving operating nuclear plants and hydroelectric facilities where possible." Breaching the Snake River dams would take us in the wrong direction.

Breaching Snake River dams means more transportation-related carbon emissions and safety impacts

The proposal would end safe, low-emission marine freight transportation on the lower Snake River and likely impact the existence of barging on the rest of the Columbia Snake River System. Over 3.8 million metric tons of U.S. goods moved on the Snake River in 2018. Just over 60% of the cargo that moves on the Snake River is high quality U.S. wheat grown in our region. In fact, nearly 10% of all U.S. wheat exports travel by barge on the Snake River each year. The remaining 40% of the cargoes on the Snake are fuel products, fertilizers, wood products, and large industrial components like wind turbine parts and other project cargo.

Over 38,000 rail cars or over 149,000 semi-trucks would be needed to move the cargo that went by barge in 2018 -- assuming that many trucks, drivers, locomotives, and rail cars could be sourced, and highways and rail lines through the sensitive airshed of the Columbia River Gorge could accommodate the additional traffic. The impact to the environment cannot be overstated. This proposal would increase carbon and other greenhouse gas emissions by moving cargo from barge to less-efficient surface modes like rail and truck. Shifting cargo from Snake River barging to truck and rail will result in significant annual increases in emissions, as follows: over 860,000 tons of CO₂, 306.5 tons of NO_x, 7.5 tons of PM, 69.7 tons of CO, and 7 tons of VOC. Barging also has the best safety record of all cargo transportation modes, with fewer injuries and fatalities when compared to rail and trucking.

Conclusion

We strongly support science-based salmon recovery solutions that address the myriad threats to Northwest fish runs over every part of their life cycle. Though we do not question your commitment to salmon, this proposal continues the narrow focus on four run-of-river dams with some of the highest fish passage numbers in our region. It is a speculative and costly plan that assumes we must choose between productive, fish-friendly federal projects and our Northwest salmon and steelhead runs. We believe this is a false choice, and ignores the broad commitment to salmon recovery that must be region-wide and sustained for generations. We look forward to continuing our partnership with the entire Northwest Congressional delegation and the Governors of all four states in a continued dialogue about the choices we make for salmon, energy, transportation, agriculture and our way of life in the Northwest.

Respectfully,

Almota Elevator Co.
Benton PUD
CHS Primeland
City of Richland
Columbia River Crab Fisherman's Association
Columbia River Pilots
Far West Agribusiness Association
Franklin PUD
Idaho Farm Bureau
Idaho Grain Producers Association
Idaho Wheat Commission
Lewis-Clark Terminal
McGregor Land and Livestock
Montana Grain Growers Association
National Association of Wheat Growers
Oregon Wheat Growers League
Pacific Northwest Grain & Feed Association
Pacific Northwest Waterways Association
Pasco Chamber of Commerce
Port of Benton
Port of Chinook
Port of Camas-Washougal
Port of Clarkston
Port of Ilwaco
Port of Kalama
Port of Lewiston
Port of Longview
Port of Morrow
Port of Pasco
Port of Royal Slope
Port of Umatilla
Port of Walla Walla
Port of Whitman County
Shaver Transportation
TEMCO
The American Waterways Operators
The McGregor Company
Tidewater
Tri-City Regional Chamber
TRIDEC
United Grain Corp.
Visit Tri-Cities
Washington Association of Wheat Growers
Washington Grain Commission
Washington State Potato Commission

cc: Gov. Greg Gianforte
Gov. Brad Little
Gov. Jay Inslee
Gov. Kate Brown
Sen. Steve Daines
Sen. Jon Tester
Sen. Jim Risch
Sen. Mike Crapo
Sen. Ron Wyden
Sen. Jeff Merkley
Sen. Patty Murray
Sen. Maria Cantwell
Rep. Matt Rosendale
Rep. Russ Fulcher
Rep. Suzanne Bonamici
Rep. Cliff Bentz
Rep. Earl Blumenauer
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