

Pacific Northwest Waterways Association – Columbia-Snake River System Sample Draft EIS Comment Information



March 2020

We encourage your participation in the conversation about the risks of losing the community benefits provided by the hydroelectric dams and locks of the Columbia-Snake River System. The blocks of information below provide text that may be inserted into letters to elected officials, opinion pieces in your local media, and comments on the U.S. Army Corps of Engineer's Draft Environmental Impact Statement on the Columbia River System Operations.

The information is organized by topic. Please draw from any that are relevant to you and/or your organization and incorporate into your unique comments so our leaders, regulators, and communities can understand what the sweeping effects of changes to the river system mean to our diverse interests.

It's crucial that your comments are:

- **Timely** – Comments on the draft EIS are due no later than April 13, 2020.
- **Substantive** – They should clearly explain how this issue directly affects you and/or your organization, identify what in the draft EIS is incorrect and/or incomplete, and provide information that allows the agencies to correct/complete it.
- **Original** – Comments must be unique to be counted in the EIS process; identical form letters or petitions are grouped and considered and treated as one single comment.
- **Shared publicly** – While providing information during agencies' decision-making process is important, it is equally important that we shape the public conversation about the value of our Northwest river system and the role the dams play in creating that value. We need to show that river system supporters are a broad and inclusive set of the electorate.
 - Post your comments on your website and social media
 - Share them with your customers and constituents
 - Write letters to the editor
 - Share your perspective whenever and wherever the opportunity presents

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Preferred alternative

- The preferred alternative identified in the Columbia River System Operations draft EIS maintains the progressive balance of economy and environment that is so important to Pacific Northwest life and culture. The preferred alternative focuses on benefitting fish recovery using water management measures while balancing our communities' needs for water, power, navigation, and trade.
- The preferred alternative rightly avoids the extreme measure of dam breaching. Dam breaching would have devastating effects to our Northwest communities, which rely on the clean power, irrigation supply, and navigable waters made possible by our federal system of locks and dams.
- By identifying the preferred alternative, federal agencies acknowledge the world-class investments in fish passage facilities completed over the years that now allow over 95% of fish to pass each of the federal dams safely. Breaching any of these dams would have very negative consequences to our Northwest communities while yielding marginal improvements to salmon recovery.
- The draft EIS is correct to call for further action outside the scope of the Columbia-Snake River System to accelerate the recovery of anadromous fish like salmon. The most updated science from the National Oceanic and Atmospheric Administration finds that conditions in ocean waters need to improve for fish numbers to increase. We need to consider the whole ecosystem that salmon depend on and not limit our focus to the dams on the Columbia-Snake River System, where so much investment and improvement has been made in world-class fish passage infrastructure.

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Balanced economy and environment

- The benefits of the Columbia-Snake River System have contributed to thriving communities in the Pacific Northwest, where we enjoy a healthy economy and environment.
- The system's hydroelectric dams and locks provide us with clean affordable energy for our homes and businesses, irrigation water for agriculture and navigable waterways that ship goods to and from the farthest inland port in the country. The environmental effects of these economic benefits are managed with world-class investments that help maintain salmon populations and other ecological benefits.
- Salmon and other fish are an important part of the river system that need to be protected, and their challenges are multifaceted. Over time, the dam system has improved to help over 95% of fish pass the dams on their journeys up and down river. Fish populations on the Snake River have trended upward for the past 25 years. Breaching the dams would have marginal and uncertain improvements to fish populations and deprive our communities of the dams' substantial benefits.
- We call on our leaders to address the many factors that affect salmon populations, including avian and pinniped predation, ocean conditions, and climate change. The Columbia-Snake River System makes significant contributions to the fight against climate change in the forms of clean hydropower and fuel-efficient cargo shipping.
- The dams support vulnerable communities with fragile economies. The 10 counties most affected by a dam breaching scenario are primarily rural areas in which one in five people are already at or below the federal poverty level, and average wages are 25% below the national average.

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- Dam breaching would negatively affect agriculture, manufacturing, transportation, trade, and tourism businesses that are physically or functionally related to safe navigation, freight movement, and river access.
- Barging is the most efficient and least carbon-intensive mode of cargo transportation. Barging is nearly 40% more fuel-efficient than freight trains, and 270% more fuel-efficient than semi-trucks. Our clean energy economy cannot rely on conventional freight trains and trucks to reduce carbon.

Navigation and shipping

- The Columbia-Snake River system of dams and locks enables cost-effective and fuel-efficient transportation of goods—connecting the farthest inland port in the country to markets in the Northwest and abroad.
- Much of the food we enjoy and depend on daily is transported up and down the river system.
- More wheat is transported along the Columbia-Snake River System than anywhere else in the U.S.
- One barge with tow can ship the equivalent goods of 1.4 100-unit freight trains, or 538 semi-trucks. These trains and trucks would congest our communities, increase greenhouse gas emissions, and decrease air quality if we lose the system of dams and locks that enable barge shipments.
- Barging is nearly 40% more fuel-efficient than freight trains, and 270% more fuel-efficient than semi-trucks. In 2018, it would have taken 38,966 rail cars or 149,870 semi-trucks to move the 3.9 million tons of cargo shipped on the Snake River alone.

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- Grain suppliers and shippers that our economies depend on will likely see an increase in transportation and storage costs by 50 to 100% if barging is lost as a transportation option. In an industry where \$5.00 per bushel is the current break-even cost, the loss of barging could increase transportation and storage costs from \$0.40 per bushel to up to \$0.80 per bushel.
- Our economies are not prepared to function with the loss of barging on the Columbia and Snake rivers. Our highway, rail, and grain elevator networks would need over \$1.1 billion in capital investments to adapt. This includes hundreds of miles of shortline rail track that have been abandoned; new rail; major highway improvements; and retrofits for grain elevators that do not have rail-loading capabilities.
- More than 1,100 farms may be at risk of bankruptcy if farm subsidies are not increased. In 2017, the average regional net farm cash income was only \$42,825. With wheat prices already down near the break-even point, the federal government would need to increase annual direct payments to farmers by up to \$38.8 million to maintain current income levels.
- Regional deep-draft ports, such as the ports of Portland, Vancouver, Kalama and Longview, rely on barging to help move products from inland communities to export facilities. Grains and other commodities are barged via the Columbia-Snake River System to these deep-water ports and shipped to trade partners all over the world, supporting more than 40,000 local jobs.
- River cruises continue to be a growing market in our region. Each summer, thousands of passengers enjoy the Columbia and Snake rivers on cruise vessels, which travel the 325 river miles between Vancouver and Clarkston, relying on the locks to get up and down the rivers. More than 18,000 cruise passengers visited riverside communities in 2017, contributing over \$15 million to the local and regional economies.

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Hydroelectric power

- Our system of affordable and renewable hydroelectric power is the backbone that will support our new clean energy economy—providing reliable energy for our communities when wind and solar cannot. 90% of the Northwest's renewable energy comes from hydroelectric dams.
- Removing our hydroelectric dams would worsen climate change by reducing our renewable energy supply and requiring less efficient trains and trucks to replace barging.
- Breaching the Lower Snake River dams would cause diesel fuel consumption to increase by nearly 5 million gallons per year as barges are replaced by less efficient truck-to-rail shipments. At least 201 additional unit trains and 23.8 million miles in additional trucking activity would be required annually, resulting in increases in CO₂ and other harmful emissions by over 1.2 million tons per year.
- The combined loss of clean power and fuel efficiency from the river system would result in equivalent carbon emissions generated by a Boardman coal-fired power plant every five to six years.

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