July 3, 2022

Governor Jay Inslee

Senator Patty Murray

Re: Comments regarding the SLRD Benefit Replacement Draft Report

Dear Governor Inslee and Senator Murray,

Thank you for the opportunity to comment on the Lower Snake River Dams Benefit Replacement Draft Report. We also thank you for your leadership in moving this issue forward to seek resolution and urge immediate breach of the four Lower Snake River dams (LSRD).

The results of the Draft Report support my basic conclusion that dam removal is our best chance to prevent Snake River Salmon and steelhead extinction and needs to be part of a comprehensive solution for native salmon and steelhead recovery. In addition, I believe that our PNW congressional leaders and the Biden administration must support the Murray/Inslee plan and work together with Tribes, industry, and communities to take **Immediate and urgent action** to prevent extinction while meeting our energy and agricultural needs.

I have submitted my message to you about our native anadromous salmonoids in the Snake River basin being on the brink of extinction and running out of time. This keystone species also supports the Southern Resident orca as well as many tribal communities who depend upon salmon in the region. Failure to remove the four LSRD will results in a continuation of a failed, incremental, status quo management approach that will lead to the extinction of our wild anadromous fish. Nearly all of the anadromous fish that were once plentiful in the Columbia Basic are listed as threatened or endangered and fact extinction, under the federal Endangered Species Act. Furthermore, these native fish are the foundation for recreation, commercial and tribal fisheries which are critically important to the Pacific Northwest.

Breaching the LSRD would restore 140 miles of free-flowing river and vital riparian habitat, enhance salmon and steelhead access to over 5,500 miles of pristine spawning grounds, and contribute to the recovery of the greater PNW ecosystem including ESA-listed Snake River salmon and Southern Resident Orca (SRO). Furthermore, it would honor tribal rights by providing more fishing, hunting, and gathering opportunities, restore access to cultural sites and activities, mitigate climate change by reducing harmful methane emissions from the SLRD reservoirs, and sequester more carbon in restored vegetation. Recreational and economic opportunities would further be enhanced. BPA has spent billions of dollars to restore salmon and steelhead with mechanical fixes including fish hatcheries, barging, predator control, endless fish-passage “improvements” and more. It appears that the main use of the expensive locks and navigation system is to haul the baby salmon down below Bonneville from the salmon killing LSRDs, as, in the 2 weeks I just spent on the Lower Snake, the few barges I noted were mostly “juvenile fish transportation” barges run by the Army Corps of Engineers. As a result of the “mechanical fixes” not one fish species has been saved or status improved.

The LSRD have contributed to the high water temperatures (in violation of the Clean Water Act) in the pools behind dams, increased predation, inundated spawning and rearing habitat, and increased mortality from stress and disease. The Columbia and Snake Rivers were changed from free-flowing rivers to a series of dams, with slow moving reservoirs that delay downstream migrating juveniles. Fish from the Snake River must traverse eight large dams and their reservoirs, both upstream and downstream, during their migration.  Combined mortalities for this round trip journey from natal stream to the ocean and back to a smolt to adult survival of generally less than 2%, which is a guaranteed recipe for extinction.

Economically, the LSRD dams are bad business. If the four lower Snake River dams were privately owned, they would already have been breached.  One of the numerous rationales to retain the dams are for barging, especially wheat products. In fact, barging tonnage has declined by 70% since the late 1990’s, the Port of Lewiston hasn’t operated “in the black” since 2012, every barge is highly subsidized by the unsuspecting American public at $30,000/barge load, and the US Army Corps of Engineers conducts very expensive dredging of the channel at Port of Lewiston every 3-5 years, another taxpayer expense of a highly subsidized industry.

Irrigation is another unjustified rationale to retain the LSRD. Only 13% of land within five miles of the

lower Snake River is irrigated, of which most is near the TriCities. Furthermore, that status quo favors the needs of fewer than two dozen irrigators all located on just one of the four reservoirs, the Ice Harbor Reservoir. With LSRD removal, the river itself would remain available for irrigation. A one-time expense of aid to farmers to upgrabreaching.

While the LSRD have a combined 3,300 MW capacity, the 20 year actual production is a little over 1,000 MW/year due to seasonal effects and spill requirements. LSRD power production peaks with spring runoff when prices are low but is generally unavailable for needed months in winter and summer. Furthermore, the average cost of hydro power production in the Columbia Basin has been $24/MW while solar and wind power is usually cheaper and becoming more so every year.  Over half of the Northwest’s electricity production is exported, historically to California.  While wholesale prices vary, $55-$20/MW, the value produced by the LSRD is lowest in spring when there is a glut of power in the grid and the retail selling price of power is lowest, below the cost of production. BPA sells power to PUDs for approximately $35/MW, under contracts, most of which come due in 2028. In addition, California is buying less power due to increased production in state.  In fact, sometimes BPA pays California to take power to stabilize the power grid.  How does that help ratepayers and taxpayers when we’re paying another state to take our hydropower?

The four LSRD are aging and increasingly inefficient and the cost to upgrade crumbling dams becomes increasingly expensive. The original turbines at the 4 LSRD are all beyond their predicted “lifetimes.” Replacement costs for each turbine are about $45 million. Replacement costs are not part of the BPA’s Operations and Management Budget. We urgently need to make the investments needed to transition to new energy sources and shift our transportation and irrigation systems. The cost of producing renewable energy continues to drop as the cost of maintaining older hydro projects goes up.  In fact, the utilities consulting firm Energy Strategies determined that an assortment of new energy resources including wind, solar, demand response, energy efficiency, and battery storage, would provide more flexibility, reliability and value than the LSRD.

Once built, the LSRD became four dams too many and with eight dams total to travel upstream and downstream, native salmon and steelhead have spiraled steadily toward extinction.  Furthermore, the relatively minor economic benefits the LSRD provided have never been defensible compared to the massive economic, ecological and social toll experienced by lost fishing economies throughout the Pacific Northwest from the Oregon and Washington coasts to inland small Idaho rural communities. Commercial, recreational and tribal fisheries depend on a recovered river and recovered native anadromous fish runs to support the many communities and economies in the Pacific Northwest.  The individuals and businesses that create jobs in those communities require a significant positive impact of fishing on the overall economies of Washington, Oregon and Idaho.  With the ongoing dramatic decline (and near extinction) of salmon and steelhead runs, particularly in the three states’ rural communities, nearly every business is negatively impacted, dropping some into suspension or closure, and even bringing a few communities to the brink of economic collapse.

While we do not speak for the numerous Native American tribes, there are multiple tribes throughout the Pacific Northwest, including in Washington and Oregon, to whom the U.S. owes Treaty obligations to provide for the protection of their native river systems and the salmon and steelhead runs. The value of the tribal fisheries to their people and their economy cannot be easily calculated but is critical to support tribal cultures and economies. The LSRD not only inundated traditional hunting, gathering, fishing and cultural sites, it also compromised tribal fishing rights. The many tribes impacted by the LSRD depend on restoration of native fish runs for their subsistence, economy, culture and their future.

We urge you to breach the LSRD dams as soon as possible. We cannot wait years to do more studies, develop the numerous details of a mitigation plan and reaching consensus will take too much time and is highly unlikely. The fish have no more time left.

Thank you for the opportunity to comment.

Sincerely,

Laurie Kerr