

COLUMBIA RIVER CONSERVATION LEAGUE

1942 Hetrick Ave.
Richland, WA. 99352

February 22, 2000

FEB 23 2000

U. S. Army Corps of Engineers
ATTN: Lower Snake River Study
201 North Third Ave.
Walla Walla, WA. 99362

RE: Comments in support of Alternative 4 within the Draft Lower Snake River Juvenile Salmon Migration Feasibility Report & Environmental Impact Statement.

Dear Sirs:

The Columbia River Conservation League supports Alternative Four, breaching of the four lower Snake River dams, within the Draft Lower Snake River Juvenile Salmon Migration Feasibility Report & Environmental Impact Statement (draft EIS) for the following reasons:

Our comments with regards to the science and economics provided in the draft EIS are described in this letter; however, I would like to present an introductory discussion that goes far beyond economics.

Introduction:

Debating whether to remove the Snake River Dams to save our once magnificent runs of salmon is playing God with God's creations. Faced with this choice, a truly God fearing people wouldn't hesitate; they would rush in to tear down the dams. We didn't create salmon, God did. God didn't create the Snake River dams, man did. But removal of these dams is bitterly opposed even in the face of overwhelming scientific evidence telling us salmon will go extinct unless the dams are breached and breached quickly. Clearly, opposition to breaching the Snake River dams to save salmon is not about preserving God's creations. It's not about ensuring we promote a healthy ecosystem for us all to live in. It's not about saving salmon for our children's use. No, . . . instead the opposition to breaching the Snake River dams centers on maximization of profits for a privileged few, fear of change, and a vain attempt to preserve the economic status quo.

Any argument that places the economic status quo, an abstract construct of man, above protecting salmon, an essential component of the ecosystem on which we all depend, is fundamentally immoral. And any argument that places the economic status quo above

protecting an endangered species is contrary to one of the most basic principles of American Society; . . . Leaving our country a better place for future Americans. Any argument that places the economic status quo above protecting an endangered species is an example of short term thinking at its worst when you consider our economies are destined to change with time anyway. On the other hand, extinction of an endangered species is forever – dams are not.

The case of the Snake River Dams is a classic reflection of these principles. It makes no sense to postpone breaching the Snake River dams to save salmon when our regional economies must inevitably change anyway for many reasons besides protecting salmon. Operation of the Columbia and Snake River System will change as utilities are deregulated, as world agricultural markets shift, and to conserve natural resources other than salmon such as clean water supplies. Why not breach the Snake River dams now so that our regional economic modifications include healthy salmon runs rather than later after we've lost this irreplaceable resource?

Even when considering the economic status quo the argument against breaching the Snake River dams makes no sense. The so called "cheap power", river transportation, and limited irrigation produced by the dams is actually extremely expensive if the salmon losses caused by the dams and taxpayer subsidies for maintenance of the system are included in the costs side of the dam operations ledger. Of course the costs of salmon mortality against operation of the dams is left out of the equation giving a false and misleading valuation of the benefits of the Snake River dams.

It's time to correct the mistakes of the past. Keith Petersen's 1995 book, "River of Life, Channel of Death" documents the history of the lower Snake River dams. These dams were fish killing boondoggles when they were built and are fish killing boondoggles today. These dams are monuments to a sordid past in the Columbia Basin and must be removed and our salmon stocks restored.

Comments on Draft EIS:

- The Corps of Engineer's draft EIS has grossly over valued existing dam operations and undervalued the economic benefits of a free flowing snake river and restoration of our salmon stocks. Currently, salmon mortality caused by the dams isn't even calculated against the cost of maintaining these dams. That's called cooking the books in accounting. The draft EIS fails to explain that the American taxpayer subsidizes the costs of operating and maintaining the lower Snake River dams for the primary benefit of a privileged few. For example, currently, only agricultural operators within 50 miles of the Snake River System utilize the transportation system placing their competitors further from the river at a disadvantage, yet ALL American taxpayers support maintenance of the river transportation system.

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- The draft EIS fails to adequately assess the positive economic stimulation the Port of Pasco and Kennewick would realize as a result of breaching the lower Snake River dams. After breaching these ports become the inland terminus for the Columbia River transportation system. The Tri-Cities of Washington is poised to become a major western rail hub. For example a major regional rail maintenance center was recently established in Richland, Washington and negotiations are underway to relinquish the U. S. Department of Energy's unneeded rail system on the Hanford Site to local port authorities. When this occurs the Pasco rail yard will be directly linked to main rail trunk lines and the seaports of Seattle, Chicago's rail distribution centers, and all ports nationwide. This upgrade in the Mid-Columbia Basin's transportation system will easily provide more direct, quicker, and cheaper transport of goods than the current river based barging system which is increasingly monopolistic and heavily subsidized by federal dollars.

3

- Research by the Washington State Department of Fish & Wildlife, Idaho Fish & Wildlife, Alaska Department of Fish & Game, and the U. S. Fish and Wildlife Service reveals the economic value generated from sport caught salmon ranges from \$12.00 – to over \$20.00 per pound of live fish. Multiplying this value times one million adult salmon returning to the upper Columbia River after dam removal with an average live weight of 15 pounds yields an annually renewable economic resource with a value of \$180 million to \$300 million per year, every year, into the foreseeable future – if the dams are removed.

4

- Currently, the economic sector in the Mid-Columbia Basin that has expanded the least, but has the greatest potential for economic growth in the future, is tourism. Agriculture, heavy industry, and Hanford operations have all already realized their major growth potential. Expansion in these industries will do little to diversify the economy of the Mid-Columbia Basin. Removing the Snake River dams would give a boost to tourism to the tune of \$300 million per year; a value far beyond that given in the Corps of Engineers draft EIS.
- With removing the dams the Mid-Columbia Basin would receive new infrastructure in the place of the aging systems that now exist such as upgraded roads, rail systems, and federal economic transition dollars. The draft EIS fails to assess the value of this new, fish friendly infrastructure.
- The draft EIS fails to assess the costs of inevitable litigation which will follow failure to remove the lower Snake River dams. Citizen's groups, commercial fishing groups and northwest tribes have all publicly stated litigation will follow any failure to do what the best available science has recommended to save salmon stock; that is remove the lower Snake River dams.

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- The draft EIS fails to accurately assess job gain from dam removal. In addition to the relatively short term (but highly paid) work force that would come into the region to remove the dams, many jobs would be created and the regional economy diversified once the Snake River is running free once again. For example, there are over 100 major rapids that would appear on the Snake River once the dams are removed many of which were noted in the journals of Lewis and Clark. This alone would be a mecca for whitewater river rafters from all over the nation and beyond. Increased tourism does not simply mean menial, burger-flipping jobs. Combined with the region's growing vineyard tourism, a free-flowing Snake River would provide the opportunity for entrepreneurs from service industry sectors that generate real wealth for the area. The draft EIS grossly undervalues this aspect of economic diversification.

6

- The draft EIS fails to adequately examine the importance removing the lower Snake River dams as the best means to prevent other salmon dependent species from being listed as endangered. Killer whales in Puget Sound, sea lions along the coast, bald eagles throughout the Pacific Northwest, and a host of other species depend on abundant salmon stocks to maintain their populations. The cost of recovery for these salmon dependent species must be added proportionally to the cost of maintaining the lower Snake River dams as opposed to breaching them. The difference in percentage recovery of Snake River salmon between alternative four and other alternatives is presented in the draft EIS or its supplements. The ecological impact to other salmon dependent species must be assessed proportionally among the alternatives presented in the draft EIS.

Beyond the economic status quo we must answer the long-term questions. Are we really going to sacrifice our salmon, an annually renewable resource worth many millions of dollars each year for the future, to save a few pennies per kilowatt-hour today? Are we really willing to deny our children this irreplaceable natural resource rather than simply revise our regional agricultural and transportation systems? Will we fail to do our part to restore the salmon runs in our own backyard that impact so many people and communities far beyond our regional borders?

By breaching the Snake River dams we have a rare opportunity to rectify the mistakes of the past while making a commitment to our future. The Snake River dams are causing irreversible damage to our environment and to our society. Instead of arguing about breaching these dams we should be working together to ensure our regional farmers and communities can transition from a dammed past to a dam free future. This is where we can find common ground if we try. But in the end the Snake River dams must go.

Sincerely,

Bob Wilson

Bob Wilson, Acting Chairman