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The Honorable Jo-Ellen Darcy
Office of the Assistant Secretary of the Army (Civil Works)
108 Army Pentagon
Washington DC 20310-0108

Dear Assistant Secretary Darcy:

As our nation faces the great challenge of modernizing its waterway infrastructure while at the same time operating under fiscal constraints such as budget sequestration, significant concerns arise with respect to obsolete and/or underused navigation projects. Within this context and with this letter, we wish to draw your attention to questions of viability regarding the USACE's dam and dredging projects on the lower Snake River and to open a dialogue with you about them.

Various investigations, including some by the Corps, reveal the lower Snake River commercial navigation corridor is underused and the dams' hydropower dispensable. Please see the attached "Five Myths about Freight Transportation on the Lower Snake River" and *Seattle Times* 8/17/13 article "Snake River Barging Drop: New Factor in Dams Debate?" —both of which review a number of those investigations. As you read, consider that Washington State's wind energy production now exceeds the energy capacity of the 4 lower Snake River dams and does so unaccompanied by the significant and perpetual maintenance costs of hydropower dams.

Then please note these additional facts:

1. Navigation usage on the lower Snake River has declined markedly over the last 12 years and no evidence indicates usage of this waterway will increase. This decline occurs on top of the fact that this waterway has always had one of the lowest tons-per-mile efficiencies in the United States.
2. Over 70% of the freight transported on this waterway consists of agricultural products, principally wheat. However, in 2012/2013 two large farmer cooperatives, whose members have historically used the lower Snake River to transport grain, invested \$18 million in an intermodal rail/truck hub in eastern Washington's Whitman County. Further, a similar unit train truck/rail facility near Ritzville, Washington, has already significantly reduced barge grain transport from eastern Washington down the lower Snake.
3. In both Washington and Oregon, wind energy-related private investment and job growth have expanded rapidly, and reciprocally, rural community tax bases have grown. Unsettlingly, in its 2001 feasibility study of lower Snake dams and dredging, the Walla Walla District of the USACE chose to overlook and omit these economic trends.
4. We and most northwesterners know, and a multitude of documents show, that the dams and dredging needed to sustain navigation and hydropower generation on the lower

Snake produce habitat changes detrimental to salmonids, including both threatened and endangered salmon and steelhead. The Lower Snake River Project produces siltation, low oxygen concentrations, loss of stream cover, increased water temperature, and reductions in river flow. Widely acknowledged is the reality that loss of salmon, a keystone species that supports many birds and mammals and to a significant degree the forests themselves, would have disproportionately negative environmental, economic and cultural effects on the entire Northwest.

5. Research studies now indicate that increasing effects of climate change on sediment loads, water temperatures and flood risk will exacerbate the challenges and increase the costs USACE will face in maintaining the Lower Snake River Project.
6. Research also tells us now that breaching the four lower Snake dams by removing their earthen sections, while the concrete sections and turbines remain in place, would help restore the river ecosystem and enable broad-based recreation and commodity use; for example, wild and aquaculture fisheries. Thus, such restoration would potentially create as many jobs, or more, than those lost by the USACE's divestiture of this minor inland waterway.
7. Finally, according to our own observations, the 1947 cost-benefit analysis used to justify the Lower Snake River Project was based on flawed assumptions and erroneous economic reasoning. While we acknowledge that few cost-benefit analyses are perfect, the analysis used for these projects was exceptionally inventive. For example, when the dams' cost-benefit-ratio relative to navigation and flood control fell short of making the project appear feasible, the National Development Economic Benefit was artificially increased when the avoided costs of building expensive coal-fired plants was claimed as a benefit, plants whose power was not needed and which were not even under consideration.

In conclusion, support of robust inland waterway systems where navigation is essential to commercial movement of goods for overseas export obviously makes economic sense. Contrarily, support of erroneously justified and subsequently underused waterway projects makes no economic sense.

As stated above, we hope with this letter to open a dialogue with you regarding the divestiture of USACE's dredging and dam projects on the lower Snake River. We seek to engage you in a conversation that would in time lead to working with Congress towards the goal of allocating Lower Snake River Project funding to more critical port or inland waterway infrastructure projects. We look forward to hearing from you.

Respectfully yours,

Jim Waddell

Jane Mergler

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cc: Eric Hansen

P.S.: Please dis

For email comm

other appropriate individuals.

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NOTE: Jim Waddell
is a former DDEPM
at Walla Walla...
he can be a resource
on this issue.

Jane Mergler