SAVE OUR WILD SALMON COALITION FACTSHEET:
ERRORS AND OMISSIONS: THE PACIFIC NORTHWEST WATERWAY ASSOCIATION’S STUDY OF SNAKE RIVER RESTORATION.
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The Pacific Northwest Waterways Association (PNWA) recently released a brief “Analysis of Breaching LSR Dams” prepared by the FCS Group. The study is marred by unsupported or incorrect assumptions, double counting and incomplete analysis. Its conclusion that river restoration would cost billions of dollars and lead to large increases in carbon emissions is not accurate. Below are several examples of a larger set of errors and omissions

I. Padding Costs But Ignoring Savings:
In many instances, the PNWA study adds unverifiable costs and ignores savings that would be achieved with river restoration. For example, the study’s conclusion regarding infrastructure costs draws from a 1999 study by the Corps of Engineers but initially double-counted these costs. While this particular double counting has recently been removed, the study still relies on unspecified information from “stakeholder interviews” to increase these infrastructure costs by $50 million annually and adds another 20% to the overall costs as a “margin of error.” At the same time, the study fails to offset these padded costs with the significant taxpayer savings from eliminating the current costs of operating the lower Snake River navigation system because the PNWA study defines infrastructure and transportation costs to exclude these.

As a recent study by the economics consulting firm ECONorthwest concluded, over a twenty-year time horizon, the operation and maintenance costs for the navigation system currently covered by appropriated federal funds (taxpayer dollars) would more than cover any necessary infrastructure upgrades required to accommodate non-river transportation of goods currently shipped on the lower Snake. ECONorthwest (2019) at 59.

II. Double-Counting Costs:
In other instances, the PNWA study continues a pattern of double-counting costs. For instance, it finds that trucking costs will increase if the river is restored and then counts these same predicted increases again as a cost to the federal government. This double counting adds some 30 million dollars annually to the bill for river restoration PNWA predicts.

When the ECONorthwest study examined these costs, it found that “[t]he net annual increase in shipping costs to the region as a result of LSRD removal [would be] $6.2 million.” ECONorthwest (2019) at 52. If growers were directly compensated for these increased costs, as the PNWA study recommends, there would be no impacts to farm income requiring further federal subsidy.

III. Inflating Carbon Emissions:
One of the more remarkable – and untenable -- conclusions in the PNWA study is that river restoration would cause carbon emissions to spike by more than 800,000 tons annually. A substantial portion of this predicted increase is attributable to a single assumption. Currently, grain shipped on the lower Snake is taken by truck to a barge-loading facility along the river or to Pasco and travels by barge/river to Portland. With a restored river, some of this grain would go by truck to the closest railhead for shipping while some of it would be transported to Pasco by truck and then shipped by barge. Inexplicably, the PNWA study assumes that most of the grain that currently travels by barge on the lower Snake would be carried by truck, not to Pasco but an additional 250 miles all the way to Portland.
This adds hundreds of thousands of miles of truck travel and thousands of long-haul truck trips for no apparent reason. But it does allow the study to report major increases in carbon emissions (along with other large private transportation costs (e.g. to shippers) and public transportation costs (e.g. to highway wear and tear, accident costs, etc.).

By contrast, and with more reasonable assumptions about how grain would be transported to market with a restored river, the ECONorthwest study found only a minor increase in carbon emissions from the addition of some short truck trips to rail loading facilities or to Pasco, ECONorthwest (2019) at 53, an increase that could be economically addressed through purchasing carbon offsets while still achieving the many benefits of river restoration.

IV. Omitting Cost Savings and Economic Benefits:
One of the biggest shortcomings of the PNWA study is its failure to fully account for the costs savings of river restoration while at the same time omitting the economic benefits a restored river would generate. On the cost savings side, for example, the study neglects to mention the very large capital costs of maintaining the four lower Snake River dams over the next 20 to 30 years, a cost that alone amounts to about a billion dollars, savings that could be invested elsewhere as part of a river restoration plan.

On the economic benefit side, the study omits the economic benefits that would accrue from public and private investments, not only for river restoration itself but also replacement clean energy generation, new transportation opportunities and related economic activity in the area.

And the study says nothing about the largest economic benefits of all – the widespread economic and social value of a restored river and healthy salmon and steelhead runs. The size of these benefits create a compelling case for river restoration.

In short, the PNWA study adds little real information to the conversation about how best to restore the lower Snake River, and provide a prosperous future for all of the interests that may be affected. Instead, it is just another attempt to muddy the waters and avoid a serious examination of a better future for everyone.

For further information:
Joseph Bogaard, Save Our wild Salmon Coalition, joseph@wildsalmon.org
Todd True, Earthjustice, ttrue@earthjustice.org
Bill Arthur, Sierra Club, billwarthur@gmail.com