

April 19, 2023

The Honorable Pete Buttigieg  
Secretary  
U.S. Department of Transportation  
West Building  
1200 New Jersey Avenue, SE  
9th Floor  
Washington, DC 20590-9898

Dear Secretary Buttigieg:

As you may be aware, the decades-long litigation regarding Pacific Northwest salmon in the Columbia Snake River System is currently under a stay agreement until August 31, 2023. During the stay, the primary parties to the litigation have entered into a mediation process led by the Federal Mediation & Conciliation Service (FMCS) in hopes of reaching a settlement. We write on behalf of the defendant intervenors, whose members include ports throughout Oregon, Washington, and Idaho, consumer-owned utilities, farmers, s, transportation companies, terminals, and water resources stakeholders. The defendant intervenors entered the litigation on the side of the United States Government (USG) but were excluded from all negotiations leading up to the stay agreement. Nevertheless, we have remained as engaged as possible during the mediation process, although our concerns have not been prioritized to date.

The primary topic of discussion throughout the mediation has been the removal of the four Lower Snake River Dams (LSRD). While this proposal lacks consensus, it remains a topic of great consideration in this process, and we understand may be advocated for by elements of the USG. The removal of the LSRD would eliminate barging on the Columbia Snake River System (CSRS), requiring its replacement by rail and truck. As deeply affected stakeholders, our concern is the apparent failure of the USG to take freight transportation issues into consideration in any meaningful way. These issues include replacement infrastructure feasibility and cost, carbon and other pollution impacts resulting from the required mode shift, shipping rate impacts on agricultural producers and suppliers, and the impacts on underserved and underrepresented communities.

The replacement of barging would require a substantial expansion of road and rail infrastructure, the scope and scale of which has not been fully calculated but would most certainly include rail line extensions and expansion, the addition of railcar capacity, road expansion and extension, and substantial bridge modifications over the CSRS. There are real concerns regarding the geographic/topographic feasibility of such infrastructure projects in areas such as the Columbia River Gorge and the Snake River Canyon. There are also serious concerns regarding the political feasibility of such projects given state and federal permitting processes such as the National Environmental Policy Act.

We are particularly concerned that the developing USG mediation position stands in contradiction with other Administration policy objectives. For example, in February the Administration released its Blueprint for Transportation Decarbonization.<sup>1</sup> That Blueprint notes in Figure B (Page 5) and elsewhere that maritime transportation (including river barging) accounts for only 3% of transportation-related emissions and in Figure 6 (Page 43) that maritime transportation has the lowest emissions per ton mile for freight. The Blueprint calls for actions before 2030 (Pages 7, 78) to “provide incentives to support greater use of efficient travel modes and vehicles...” (underline added). Given that maritime movement

of freight is the most efficient mode of transportation we fail to understand how removal of the 4 LSRD could be consistent with this Blueprint.

Even if a shift from barge to rail and truck were feasible, increased reliance on truck and rail will result in an increase of 23.8 million miles of travel per year on county, state, and federal highways, increasing net transportation costs substantially<sup>2</sup>

Some of the impacts of such a shift are that:

- Total truck transit times would increase by at least 408,262 hours per year;
- The expanded trucking activity will increase fuel costs, highway maintenance costs, terminal facility and maintenance costs, driver time, and vehicle maintenance costs, to the tune of \$63.6 million per year;
- The shift in ton-miles from barge to rail and truck will increase fuel consumption by 4.67 million gallons per year, thereby reducing our nation's ability to achieve energy independence; and
- Increased transportation and storage costs will put more than 1,100 farms at risk of bankruptcy.

Shifting commodity flows from barge to truck and rail will be bad for the environment. Annual emissions will increase as follows:

- 860,000 additional tons of CO<sub>2</sub> per year;
- 306.5 additional tons of NO<sub>x</sub> per year;
- 7.5 additional tons of PM per year;
- 69.7 additional tons of CO per year; and
- 7 additional tons of VOC per year.

These increased emissions would be equivalent to cumulative impact of the Boardman coal-fired power plant every 5–6 years. The region has made the collective decision to close the Boardman plant because it generates 4.6 million tons of CO<sub>2</sub> annually. Removing the Snake River dams would reverse the environmental progress associated with its closure. It would also have an environmental impact equivalent to:

- Adding 90,365 standard size homes;
- Adding 181,889 passenger cars; or
- Removing 6,927 acres through deforestation.

Such infrastructure projects commonly adversely impact low-income and other underserved/unrepresented communities residing adjacent or in close proximity to such projects. These communities suffer during land acquisition and construction of new projects as well as from exposure to increased pollutants from exhaust emissions, tire wear, and other environmental exposures. In addition, the agricultural impacts outlined above will not only impact landowners but also their workers, the majority of whom are Hispanic. Tribal treaty rights and environmental justice for Native Americans are crucially important, but the impacts on other underserved/underrepresented communities must also be taken into account. We therefore urge DOT and the mediation participants to engage with the White House Environmental Justice Advisory Council

(<https://www.whitehouse.gov/environmentaljustice/white-house-environmental-justice-advisory-council/>) to assess the full suite of environmental justice concerns related to LSRD removal.

We believe it is imperative that DOT lean into the mediation process, as the process appears to be operating in a vacuum separate from broader public policy objectives such as these transportation issues as well as other issues like clean energy, environmental justice concerns, agricultural impacts, international trade objectives, and even national security concerns.

Thank you.

Sincerely Yours,

The McGregor Company  
Great Northwest Transport  
Tidewater  
Shaver Transportation  
Port of Lewiston  
Port of Woodland  
Columbia River Towboat Association  
Diversified Marine, Inc  
Port of Longview  
Port of Whitman  
Port of Clarkston  
Port of Benton  
Port of Walla Walla  
Port of Pasco

1. <https://www.transportation.gov/priorities/climate-and-sustainability/us-national-blueprint-transportation-decarbonization>
2. National Transportation Impacts & Regional Economic Impacts Caused by Breaching Lower Snake River Dams. January 2020. [www.fcsgroup.com](http://www.fcsgroup.com) Contracted by Pacific Northwest Waterways Association.