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July 11, 2022

Governor Jay Inslee  
Office of the Governor  
PO Box 40002  
Olympia, WA 98504-0002

Senator Patty Murray  
2988 Jackson Federal Building  
915 2nd Ave.  
Seattle, WA 98174

Submitted Electronically: <info@lsrdoptions.org>

RE: Comments on Draft Lower Snake River Dams Benefit Replacement Report

Dear Governor Inslee and Senator Murray:

American Whitewater provides these comments in response to the Draft Lower Snake River Dams Benefit Replacement Report (Draft Report) prepared by Kramer Consulting and Ross Strategic (Consultant Team) to support the Inslee-Murray process to determine whether there are reasonable means for replacing the services and benefits provided by the Lower Snake River Dams, sufficient to support dam breaching. American Whitewater believes the environmental and social justice costs of the Lower Snake River Dams exceeds the benefits they provide, and those services currently provided by the dams can be replaced as detailed in the Draft Report. In addition to the significant benefits to salmon and steelhead, removing the four lower Snake River dams will open opportunities for a 140-mile, multi-day river trip and enhance on-river recreation opportunities in key tributaries.

### **About American Whitewater**

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 50,000 supporters, 6,000 dues-paying members, and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American

Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates. American Whitewater has a significant percentage of members residing in the Pacific Northwest as well as members who travel from across the country to experience 100's of spectacular whitewater runs in the Columbia River Basin, and specifically the Snake River watershed..

## **General Comments**

The Draft Report includes as a major finding that the replacement of the services of the Lower Snake River Dams is possible, but at a significant cost and with a major infrastructure program. This statement should be balanced with a header stating that retaining the Lower Snake River Dams represents a significant cost to the region.

The Draft Report also notes that replacing the services provided by the Lower Snake River Dams could range from \$10.3-\$27.2 billion. These services, as currently provided, are not free and come at significant cost and with associated social justice impacts.

A premise underlying the report is that the Lower Snake River Dams cannot be breached until all functions and benefits are replaced or compensated. This is concerning because in the meantime, the impacts to salmon, and cost to indigenous communities that depend on them, will continue. The Draft Report inappropriately puts salmon and Tribal interests lowest on the priority list. The legal mandates associated with Treaties should make salmon and Tribal interests top priorities, rather than lowest as in the report. We need more immediate action.

## **Comments on Recreation**

### *Economic Valuation of a Restored Snake River*

While free-flowing rivers are necessary for healthy fish populations, they also provide opportunities for river-based recreation that includes rafting, canoeing, kayaking, tubing, fishing, and drift boating. As noted in the Draft Report, a 140 mile stretch of the Snake River that could be restored through the removal of the dams would restore opportunities for day trips and multi-day trips along a stretch of river that historically had 63 named rapids,

approximately 70 small islands, and numerous boat-accessible sites for camping and day use. The entire stretch would provide opportunities for a week-long river trip. With intermittent road access, day trips or weekend trips would also be possible. Recent research has demonstrated that rivers are resilient and most respond quickly to dam removal, particularly when dams are removed rapidly, over a period of months and not decades.<sup>1</sup> We concur with the findings of the Draft Report that the shift to a free-flowing river would create the potential for growth of new recreational opportunities.

The economic benefits of recreational opportunities made available through river restoration are substantial. While the Draft Report acknowledges these benefits, it references the fact that they are “uncertain” and “may eventually” increase to levels and values greater than current recreational opportunities. This framing understates the recreational values of a free-flowing river, mentioning those values only briefly in vague terms while describing in detail the quantified economic impacts of cruise trips on the reservoirs. We believe the anticipated benefit through recreation is more definitive than is expressed in the Draft Report. The Draft Report does cite the study by Loomis (2002) using a contingent-behavior travel-cost model based on intended trips if the lower Snake River dams were removed but does not articulate the key findings. He found that the restored river would attract 1.5 million visitor days that would grow to 2.5 million visitor days 20-100 years following river restoration.<sup>2</sup> The estimated economic benefit, as estimated two decades ago, would be \$310 million. The basic approach was to evaluate contingent behavior by 1) describing the new recreation conditions represented by a free-flowing river, 2) surveying households and to ask if they would visit and at what frequency, and 3) asking the expected travel cost and travel time. Using this information, one can model prospective use and quantify the associated economic benefits. While an updated economic analysis is necessary given changes that have occurred over the past two decades since this analysis was conducted, it's clear that the benefit would be positive. The population for Washington State increased 14.6% between 2010 and 2020, outpacing the national trend;<sup>3</sup> we now have a better understanding of the rapid pace at which rivers recover and know that new recreational opportunities on the Elwha, White Salmon, and Sandy River became immediately available following dam removal;<sup>4</sup> and demand for multi-day river trips has continued to increase in the region with most of the major rivers restricted (i.e. at capacity) by

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<sup>1</sup> O'Connor, J.E., J.J. Duda, and G.E. Grant. 2015. 1000 dams and counting. *Science* 348 (6234) 496-497.

<sup>2</sup> Loomis, J. 2002. Quantifying recreation use values from removing dams and restoring free-flowing rivers: a contingent behavior travel cost demand model for the lower Snake River. *Water Resources Research*. 38(6):2.1-2.8.

<sup>3</sup> Source: U.S. Census Bureau, Washington State, <<https://www.census.gov/library/stories/state-by-state/washington-population-change-between-census-decade.html>>.

<sup>4</sup> The Restored Lower Gorge on the White Salmon River, Sheer Madness Productions, <https://vimeo.com/52085922>.

limited-entry permit systems.<sup>5</sup> We appreciate that the Draft Report explicitly highlights this increase in demand for recreation and rafting opportunities through free-flowing rivers.

In addition to the economic benefits of a restored river based on a travel cost demand model, an existence value or passive-use value of a restored Snake River is also important to consider. Existence value accrues to members of the public who would value a restored Snake River regardless of whether they ever paddle, camp, fish, or otherwise directly use the resources a restored Snake River would provide; individuals who might never make active use of the Snake River might derive satisfaction from its mere existence. This existence value is one component of the total value individuals place on the environmental change that would occur in a transition from a reservoir system to a free-flowing river. Evidence that existence value exists for this restoration opportunity can be found in the thousands of comments from individuals from across the country and contributions to organizations who advocate for a restored Snake River. Precedent for this type of analysis exists with the assessment that was done for the Klamath River Basin in advance of dam removal in that watershed.<sup>6</sup>

The Draft Report states that some are concerned that a shift away from current recreational opportunities provided by reservoirs to those of a free-flowing river will leave out older people and people with disabilities. We disagree with this assessment. Many of our members are older and have disabilities that prevent them from taking part in other outdoor activities. River running is an activity that can be enjoyed by a wide range of people including those who have mobility issues. We do believe it is important to be inclusive in accommodating a wide range of skill levels and abilities and this often requires intentional planning for river access sites. This is currently an active topic of interest to river managers; the theme of the 2023 River Management Society Symposium is "Reimagine River Access", a program theme that includes assessing the physical, economic, and social issues surrounding river access. The Department of Interior includes expansion of access for underserved communities and people with disabilities as part of its Equity Action Plan.<sup>7</sup> A restored river is not a barrier to use and enjoyment by older people and people with disabilities, but an opportunity to ensure that we are making these experiences welcoming and accessible for all.

### *Local Community Benefit*

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<sup>5</sup> With increasing demand more rivers have had to go to limited-entry permit systems as evidenced. Most recently, the John Day River joined the list of rivers that distribute permits through a reservation system. See <<https://www.americanwhitewater.org/content/Article/view/articleid/30958/display/full>>

<sup>6</sup> See Carol Mansfield et al., "Klamath River Basin Restoration Nonuse Value Survey," January 19, 2012 (see especially, Table 2-1, Previous Valuation Studies of Dam Removal or Related Restoration Efforts).

<sup>7</sup> U.S. Department of the Interior Equity Action Plan, April 14, 2022, <<https://www.doi.gov/sites/doi.gov/files/eo13985-02-10-2022-doi-equity-action-plan-final-with-cover.pdf>>

Restoring the lower Snake River will open opportunities for communities to reconnect to their riverfronts, rather than further extending levees that wall off the river. This will provide enhanced recreational opportunities and may result in stronger economies for riverfront communities. The Draft Report did not address the benefits of reconnecting communities like Lewiston and Clarkston to the river under the dam removal alternative.

### *Socio-Economic Impacts to Recreation on Upstream Tributaries*

In addition to analyzing the opportunities that could be available on the mainstem Snake River, socio-economic benefits of dam removal will be realized for river-based recreation on upstream tributaries like the Salmon, Lochsa and Selway Rivers. Currently, river management agencies are implementing restrictions on recreational boating out of concern over their impact on salmon. For example, the Forest Service had a policy of reissuing river permits for the Middle Fork Salmon that came available through trip cancellations. Today, the agency no longer re-issues these permits during the salmon spawning season (August 15 to September 15) in order to reduce overall recreational use in an effort to reduce potential impact to spawning Chinook salmon. The policy is based on a concern that a large number of boats floating over spawning salmon could cause them to repetitively leave their redds. This in turn could lead to a reduction in reproductive success or complete reproductive failure through pre-spawn mortality if the salmon expend too much energy in their repetitive avoidance behaviors.

Although American Whitewater has questioned the scientific basis for this policy and equity of this mechanism to limit boating (permits for commercial trips were not similarly limited), we are concerned with the larger issues that have driven river management agencies to take such wide-reaching measures to protect salmon in the basin. Biologists involved in establishing the policy on the Middle Fork Salmon communicated to us that salmon runs are at 5% of their historical level, and that the dams on the Snake and Columbia River are responsible for the 95% reduction in salmon populations. We are concerned about the future of recreation opportunities in the Snake River basin, as river management agencies are considering additional management actions to restrict paddling if salmon runs continue to decline.

The Draft Report should be revised to include the socio-economic impacts on recreation in the upstream tributaries on both removing the lower Snake River dams and keeping them in place. Specifically, this should consider the impacts of increased limitations on recreational activity if salmon are not recovering.

### *Summary*

We join citizens of the region who support bringing wild salmon back to the Snake River and its tributaries by restoring the river through dam removal. Communities around the nation are enjoying the benefits of river restoration; they witness firsthand the benefits of restoring rivers for the benefit of fish and local communities when unnecessary dams are removed. Thank you for considering our comments on the Draft Report.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a long horizontal stroke extending to the right.

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director