



Testimony of Neil Maunu, Executive Director, Pacific Northwest Waterways Association
Before the Water, Wildlife, & Fisheries Subcommittee of the Natural Resources Committee titled,
“Left in the Dark: Examining the Biden Administration’s Efforts to Eliminate the Pacific Northwest’s
Clean Energy Production”

U.S. House of Representatives

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Good afternoon, Chairman Bentz, Ranking Member Huffman, and Members of the Subcommittee; thank you for the opportunity to testify before you today. My name is Neil Maunu. I serve as the Executive Director of the Pacific Northwest Waterways Association, or PNWA. PNWA is a non-profit, non-partisan trade association that advocates for federal policies and funding supporting regional economic development. Founded in 1934, our membership has grown to over 150 entities, including ports, public utilities, farmers, forest products producers, and public agencies that support navigation, energy, trade, transportation, and economic development throughout the Pacific Northwest.

A subset of PNWA membership, the Inland Ports and Navigation Group, or IPNG, has been a defendant-intervenor in the decades-long litigation surrounding salmon and 14 federal dams in four Northwest states. That litigation has been under a stay since October 2021, during which time the litigants engaged in a so-called mediation process led by the White House Council on Environmental Quality (CEQ) and the Federal Mediation & Conciliation Service (FMCS). Early on, the mediation broke down into a series of bilateral discussions between the United States Government defendants and the plaintiffs known as Private Caucuses. The subject matter of private caucuses within the FMCS mediation process is kept confidential to the participants therein. The millions of Northwest residents that we represent were effectively cut out of any negotiations.

We sought to participate in good faith and provided numerous documents outlining our concerns. Those documents are attached to my written testimony including several letters raising process concerns, a scientific literature review regarding the controversial concept of delayed mortality, and a socio-economic impact study regarding the devastating impacts to the Pacific Northwest if the Lower Snake River Dams are removed. None of these submissions appeared to have had any impact on the mediation process or its outcome.

The USG Commitments document was shared with us in early November. It was the first time in nearly 18 months we were presented with any substantive information. We have been given a very brief opportunity to provide feedback on a plan that intends to significantly impact the operation of fourteen dams across four states for the next ten years, as well as proposals for massive new federal programs, and controversial dam breaching studies. This mediation process has been the complete opposite of the meaningful public involvement warranted for such a far-reaching and impactful plan for our region and nation.

Our response to the Commitments document is a letter outlining six primary concerns:

- First, the USG Commitments relies on the fundamentally flawed NOAA “Rebuilding Interior Columbia Basin Salmon and Steelhead Report” (NOAA Paper). This is an unauthored report that lacks the support of the scientific community and directly contradicts the existing NOAA Biological Opinion. It is not consensus science regarding the four Lower Snake River Dams and salmon.
- The USG Commitments pursue an objective untethered to any lawful standard, that is subjective, and that lacks any legal foundation. “Healthy and abundant” salmon populations is a vague and undefined policy objective that is not required by the Endangered Species Act (ESA).
- The USG Commitments fail to address river navigation as a critically impacted Congressionally authorized purpose of the federal projects and proposes only a paltry \$750,000 for a study. Washington state alone is spending \$5M on a similar study, and the Murray-Inslee report released last year recommended a \$10M study to fully analyze what it would take to replace transportation on the Snake River with rail and trucks. The Commitments fail to consider the carbon impacts of transitioning from river navigation to roads and rail. Removing the Snake River locks would cause diesel fuel consumption to increase by nearly 5 million gallons per year as barges are replaced by less efficient truck-to-rail shipments, dramatically increasing carbon emissions (to the tune of over 1.25M tons per year) – this is the equivalent of building one large coal-fired plant every two to three years. Assuming that barged wheat simply shifts to non-existent truck and rail, it would be unmarketable in the global market due to cost – destroying a generation-long way of life.
- The USG Commitments fail to ensure the delivery of affordable and reliable clean power as pledged by the USG in their mediation guiding principles from August 2022. While creating renewable tribal energy projects may be laudable, they cannot replace the reliability and pollution-free benefits of the four Lower Snake River Dams. Removing carbon-free hydropower in a time of increasing demand for renewable power generation is nonsensical.
- The USG Commitments fail to ensure the many resilience needs of stakeholders across the region. The loss of clean, reliable, and responsive hydropower and the removal of one of only three transportation modalities (the cleanest among them) available to support the region’s economy cannot meet the resiliency needs of impacted communities. We presented a socio-economic study that found removing the four lower Snake River Dams could jeopardize over 7,000 family farms. This proposal threatens the region’s most disadvantaged populations and flies in the face of any concept of community resilience.
- The complexity of the proposed operational changes in the Commitments document’s Appendix B warrant a thorough study of their potential impacts on river navigation at the U.S. Army Corps of Engineers’ Engineer, Research and Development Center (ERDC) in Vicksburg, MS prior to implementation, and a new NEPA analysis. Such a study was directed by the Court in 2017 out of safety concerns when operational impacts were to be adopted.

A critical reassessment of this process is essential. The USG Commitments lack specificity, rely on flawed and singular scientific data, and conspicuously overlook the vital concerns of our membership, particularly in areas of transportation, supply chain, and resilience. Active inclusion in the decision-making process is imperative; we demand a seat at the table. The CRSO BiOP and Record of Decision exemplified a sound approach to navigating complex issues and diverse stakeholder perspectives, and we advocate using it as the benchmark for ensuring a fair and transparent process. Beyond the immediate risks to river transportation, navigation, and safety, the very livelihoods of the thousands reliant on this river system hang in the balance.

Thank you for the opportunity to testify. I'd be most pleased to answer the subcommittee's questions.