



August 16, 2013

Mr. Stephen R. Oliver  
Bonneville Power Administration  
905 NE 11th Avenue  
Portland, OR 97232

Mr. David Ponganis  
U.S. Army Corps of Engineers, Northwestern Division  
1125 NW Couch Street  
Portland, OR 97209

**Re: Comment on Columbia River Treaty Review Working Draft of a Regional Recommendation**

Mr. Oliver and Mr. Ponganis,

Thank you for the opportunity to comment on the efforts by Bonneville Power Administration and the U.S. Army Corps of Engineers (the "U.S. Entity") to evaluate potential changes to our river system in the context of the Columbia River Treaty (CRT).

The Pacific Northwest Waterways Association (PNWA) is a non-profit 501(c)6 that advocates for federal policies and funding in support of regional economic development. We represent over 130 public and private sector member organizations in Oregon, Washington, Idaho, and California. Members include public ports, navigation, transportation, trade, tourism, agriculture, forest products, energy and local government interests. PNWA advocates for transportation, trade, energy and environmental policies and projects to enhance economic vitality in the Pacific Northwest.

Many of our members have been engaged with the U.S. Entity in the listening sessions and additional meetings to provide input from sectors that may be affected by changes to historic river system operations. Several of our members will be providing comments that are specific to their organization or sector.

We have appreciated the opportunity to meet with staff for the U.S. Entity since autumn 2012. However, our participation has been limited, as PNWA and its members are not part of the Sovereign Review Team of federal agencies, states and tribes who are guiding development of the U.S. Entity recommendation.

We were pleased to see the following themes captured in the General Principles section: continued coordination is critical to the interests of both countries; future CRT agreements should be of sufficient duration to enable long-term planning while retaining some degree of flexibility; and that U.S. water projects will continue to meet their authorized uses while abiding by pertinent regulations.

Navigation is referred to very briefly in the Working Draft Recommendation. The two sentences devoted to navigation in the document should be expanded significantly to highlight the impacts to federally maintained navigation projects and safe navigation which

will occur with changes to existing flood risk and flow regimes. The note that “minimum and maximum flows/water levels should be provided to support navigation system operations” does not provide the level of detail and explanation afforded other federally authorized activities elsewhere in the document.

The Columbia Snake River System is the largest wheat export gateway in the United States, and second in the nation for soy. The river system is tops on the West Coast for wood exports and mineral bulk exports. Over 42 million tons of international trade moved on this waterway in 2010, valued at over \$20 billion. A conservative estimate of the jobs directly tied to the deep draft navigation channel finds that 40,000 rely on this waterway for their livelihood.

This waterway is a significant national asset, and should be evaluated thoroughly for any potential changes which may impact its efficiency. Substantial federal investments have been made in both the deep draft Lower Columbia River as well as the inland barging channel and locks. The most recent examples include the Columbia River channel deepening project, Columbia River jetty repairs, and three new downstream lock gates. A major rehabilitation of the Columbia River jetties is on the horizon, along with additional lock investments and ongoing annual maintenance dredging on the Lower Columbia and at the Mouth of the Columbia.

Navigation stakeholders are most concerned with the assumption in the Working Draft Recommendation that existing spring and summer flows should be augmented through an expansion of present CRT agreements. The document further posits that these increased flows would be accompanied by less fall and winter draft of Canadian reservoirs. Navigation stakeholders have repeatedly expressed their concern with higher high flows in the spring and summer, and lower low flows in the fall and winter.

In the section related to Flood Risk Management, the Entity suggests that after 2024, U.S. projects should be used “according to their current storage reservation diagram (SRDs)”, and that “future flood risk management studies may evaluate alternative SRDs to include incorporation of ecosystem-based function.” Future flood risk management studies must also incorporate impacts to other authorized uses, including federal navigation projects, which could be impacted significantly from a departure from existing flood water management.

Several items in the “Domestic Matters to be Addressed Post-2013” section are of interest to regional navigation stakeholders. Of particular concern is Section One, which highlights the purported agreement by SRT states and tribes that “greater ecosystem flows” are desirable and should be examined. The note that “if a process is initiated, it will be a comprehensive approach, subject to public input, that addresses all opportunities to manage high flow events, including floodplain management, Columbia Basin reservoir operations, and strategic improvements to existing levees and the need for additional levees” leaves out any mention of impacts to navigation, and potential mitigation measures. This is a major oversight, and should be corrected.

The “ecosystem flows” that are being modeled by the U.S. Entity and appear to be desired by some members of the SRT may have significant impacts on navigation and navigation structures on the Columbia Snake River System. Navigation stakeholders have had the opportunity to meet with U.S. Army Corps of Engineers staff and contractors to provide

feedback, and to urge a more comprehensive evaluation of the potential impacts to navigation. We strongly encourage the U.S. Entity and Sovereign Review Team to take into further consideration the following concerns.

Ability to Safely and Efficiently Navigate Higher flows that occur more frequently will undoubtedly hinder safe navigation, as well as the efficiency of barging in the federal navigation channel. High flows reduce the number of barges that can be safely handled by a towboat in swift currents, including around the dams where spill operations may be in effect. Higher flows for longer periods of time will impact the ability of barge operators to move full tows, which will impact shipments of Northwest agricultural products, petroleum, and all other cargo handled on the Columbia Snake River System. Detailed information from the Northwest towboat community has been provided to the Corps on this issue.

PNWA members are also concerned about the impact flows may have on deep-draft ship handling on the Lower Columbia River. Higher flows may impact vessel handling, transit time, and the ability to safely anchor. Additionally, lower flows will exacerbate the lack of available draft that is already occurring on the Lower Columbia River. Draft restrictions have been in place for most of the past two years, due to sedimentation and inadequate federal maintenance dredging. Operating the river at a lower level for extended periods will have significant impacts to the regional economy.

Impacts to Federal Navigation Projects When evaluating the costs and benefits to the federal government for any changes to current river operations, our membership strongly encourages the U.S. Entity to fully capture the potential costs to existing federal navigation programs. Of particular concern is the increased sedimentation that will inevitably occur on the Columbia Snake River System with an increase in spring and summer flows. The most recent example of the impact of high flows was experienced by the region in 2011. Within six months of the Columbia River channel deepening completion in November 2010, high river flows in 2011 resulted in severe shoaling that could not be adequately addressed by the level of funding provided to the Corps of Engineers' federal dredging program. As of August 2013, a fully-maintained 43' channel has still not been restored.

Stakeholders have additional concerns regarding potential impacts to other federal navigation infrastructure. The Columbia River pile dike system, already in serious disrepair, would likely be undermined by higher flows that occur with greater frequency. Our membership is also very concerned about any potential weakening of the base of the Columbia River jetties, the rubble-mound structures that protect the entrance to the system. A seven-year, \$257M jetty rehab project will hopefully begin in 2014. Any impact to the jetty structures below the waterline would be devastating and costly.

While we realize the flows being modeled may be within the authorized operating ranges of storage projects, these flows will represent a departure from the historic highs and lows anticipated by the navigation community on the river system. It is critical to fully assess the full economic impacts to each part of the river system before institutionalizing a new regime of higher high flows and lower low flows.

Utility members of PNWA have provided comment through the Columbia River Treaty Power Group. We would call special attention to the Power Group's comments regarding the Canadian Entitlement, and the significant mismatch between payments to Canada and

diminishing ongoing downstream power benefits in the United States. Beginning in 2014, the U.S. and Canada must reevaluate these benefits and rebalance Treaty obligations to match the actual benefits received. The Power Group has also highlighted the working draft recommendation's proposal to significantly and inappropriately expand the scope of the Treaty, and the complete lack of acknowledgement of the investments in ecosystem function this region already has made for decades outside the Treaty. PNWA endorses all of the points made by the Power Group, and is listed as a signing entity on that comment letter.

We look forward to future opportunities to expand on these perspectives. Our Association will continue to engage with the U.S. Entity, and welcomes any questions you may have.

Sincerely,



Kristin Meira  
Executive Director  
Pacific Northwest Waterways Association (PNWA)

Attachment: PNWA membership listing

cc: Governor Jay Inslee, State of Washington  
Governor John Kitzhaber, State of Oregon  
Governor C.L. "Butch" Otter, State of Idaho  
Mr. Tom Karier, State of Washington Representative, Sovereign Review Team  
Mr. Bill Bradbury, State of Oregon Representative, Sovereign Review Team  
Mr. Jim Yost, State of Idaho Representative, Sovereign Review Team

# PNWA Membership Roster



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Allan Rumbaugh  
Alaska Assoc. of Port Managers & Harbormasters  
American Construction  
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Bell Buoy Crab Co.  
Benton County PUD #1  
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Northwest Public Power Association  
Oregon Int'l Port of Coos Bay  
OR Public Ports Association  
OR Wheat Growers League  
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PND Engineers, Inc.  
PNGC Power  
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